Medworth Energy from Waste
Combined Heat and Power Facility

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August 2023

Applicant's comments on Written Representations: Part 2 – Other Interested Parties

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Contents

1. Introduction

1.1 Background

1.1.1 Medworth CHP Limited (the Applicant) submitted an application for development consent to the Secretary of State on 7 July 2022 (the Application). The Application was accepted for examination on 2 August 2022. The Examination of the Application commenced on 21 February 2023.

1.1.2 This document, submitted for Deadline 7 (04 August 2023) of the Examination contains the Applicant's comments on Deadline 6 submissions. Deadline 6 submissions were made by the following organisations:

- Statutory Parties:
  - Cambridgeshire County Council and Fenland District Council **[REP6-035]** to **[REP6-037]**; and
  - Wisbech Town Council **[REP6-038]** and **[REP6-039]**.
- 30 Interested Parties; and
- 15 Non-Interested Parties, accepted at the discretion of the Examining Authority (ExA):

1.1.3 This document (Part 2) contains the Applicant's response to Deadline 6 submissions from the Interested Parties and Non-Interested Parties in the following tables:

- Table 2.1 provides responses to Deadline 6 submissions made by Interested Parties (excluding UKWIN) and Non-Interested Parties;
- Table 2.2 provides responses to UKWIN REP6-042: and
- Table 2.3 provides a response to UKWIN REP6-043.

1.1.4 The Applicant's response to Deadline 6 submissions from Statutory Parties is presented in a separate document (Part 1) in **Volume 16.4a**.

2. Comments on the Written Representation from Interested and Non-Interested Parties

Table 2.1: Comments on the Written Representations from Interested and Non-Interested Parties

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
IP01 (REP6-046)	Interested Party	Alan Wheeldon	Climate: Matters relating to climate change have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to REP2-042, REP2-049, REP2-052 and REP2-053 in the **Applicant's comments on Written Representations: Part 2 – Other Interested Parties (Volume 11.3) [REP3-040] and Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 3 and the Applicant's Response (Volume 15.10) [REP6032].** In summary: • **ES Chapter 14 Climate Change (Volume 6.2) [APP-041]** provides full details of the Applicant's climate change assessment, including relevant policies and obligations; • **Deadline 4 Submission – 12.2b Written Summary of the Applicant's Oral Submissions at ISH4 – Rev 1 [REP4-020]** summarises how the Proposed Development is compliant with the net zero pathway and the consideration of revised draft NPS EN-3; • **The Planning Statement (Volume 7.1) [APP-091]** sets out in detail how the Proposed Development complies with the Climate Change Act 2008, the policy requirements contained in the adopted NPS EN-1 and EN-3, the 25-Year Environment Plan, CCC's Climate Change and Environment Strategy 2020-2025, by providing urgently needed renewable energy generation; • The **NPS Tracker (Volume 9.18, Rev 2) [REP2-031]** sets out how the Proposed Development complies with the additional requirements set out in the revised draft NPS EN-1 and EN-3; and

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			• The **Applicant's Response to ISH4 Action Point 6 Technical Note: Combined Heat and Power and Carbon Capture Delivery Readiness (Volume 14.7) [REP5-038]** sets out the three steps to ensure the EfW CHP Facility is implemented to enable carbon capture. Boston Alternative Energy Facility DCO approval: The comments made by the IP regarding the BAEF reflect those made at Deadline 2 **[REP2-042]** and responded to by the Applicant at Deadline 3 **Applicant's comments on Written Representations: Part 2 – other Interested Parties (Volume 11.3) [REP3-040].** In preparing the Waste Fuel Availability Assessment (WFAA) the Applicant was cognisant of the DCO application for the Boston Alternative Energy Facility (PINS Ref: EN010095), see bullet point 4, Section 5.1.23 of the **WFAA Rev 5.0 [REP5-020]**. Consequently, when the Secretary of State approved the DCO on 6 July 2023 and in response to other waste matters that were examined during ISH7 (27 June 2023), at Deadline 6 (12 July 2023) the Applicant submitted a further document; **Appendix C, Briefing Note – Waste Fuel Availability Assessment Refined, Written Summary of the Applicant's Oral Submissions at ISH7 (Volume 15.3) [REP6-025].** For additional commentary on the BAEF please see the **Applicant's response to ExA's Written Questions (ExQ3) (Volume 16.2)** PND.3.1 and 3.2. The IP also references the Environment Act 2021 and with its application, the reduction in landfill and burnable waste, encouragement to greater recycling and in their opinion, an overcapacity of incineration in England. The Applicant again refers to the **WFAA Rev 5.0 [REP5-020]** and to section 5.2 and the future waste arisings that can be anticipated given the enacted of the Environment Act 2021 for example. The WFAA concludes that there would remain a shortfall of residual HIC capacity both at the national and local level.
IP02 (REP6-049)	Interested Party	Andreia Ferreira	Bus services: The Applicant's **Outline Operational Travel Plan (OOTP) (Volume 6.4) [APP-074]** aims to encourage staff to use sustainable modes of transport, including bus. Requirement 15 of the **draft DCO Rev 5 (Volume 3.1) [REP6-003]** requires the Applicant to prepare a

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			detailed Operational Travel Plan, consequently an updated review of the bus services available at that time will be undertaken. Figure 2.1 Bus Service of the OOTP identifies current bus services whilst section 2.4 provides information on the number, frequency and distance of the bus services. Local to the EfW CHP Facility Site are two sets of bus stops, on Cromwell Road and Weasenham Lane. These are not located 'over the A47' and are accurately recorded. The OOTMP states that the distance from the Cromwell Road bus stops to the EfW CHP Facility's pedestrian entrance is 690m. Four services operate from the bus stop. The Applicant considers the location of this stop to be local to the Proposed Development. The Weasenham Lane bus stops would be located 989m and 1029m from the Algores Way site entrance. One bus service operates from this stop. Measures to encourage the use of public transport are set out within section 4.3 to the OOTP. <u>Traffic surveys:</u> Please see the response to IT03 in the **Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response [REP1-056]**. The scope of the traffic survey was agreed with the host local authorities as being representative. <u>HGV route restrictions:</u> The Applicant has set out an established route for HGVs during both the construction and operation phases. This is set out within the **Outline Construction Traffic Management Plan (ES Chapter 6 Appendix 6A (Volume 6.4) [REP5-012]** and in the **Outline Operational Traffic Management Plan (Volume 7.15) [REP3-025]**. The emphasis is upon the use of the A47 and avoidance of rural roads. Diversionary routes are by their nature exceptional circumstances and vehicles accessing the Proposed Development would only follow such routes as directed by local police or highway officers. The effects upon air quality and climate change as a result of any possible diversion would not be significant and would be common to all vehicles required to follow the diversions. There are service areas in the wider location such as Shell at Fen Road, facilities at Thorney Service Centre and Eye Green for example.

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			Employment and Skills: **ES Chapter 15 Socio-economic, Tourism, Recreation and Land use (Volume 6.2) [APP-042]** considers the economic effects of the Proposed Development and takes into consideration the Applicant's commitments set out within the **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]**. This document seeks to work with local education and training establishments to support initiatives to encourage local people into the construction industry and during operation of the EfW CHP Facility. The Applicant's commitment to deliver the **Employment and Skills Strategy is secured by** Requirement 21 of the **draft DCO Rev 5 (Volume 3.1) [REP6-003]**. Air Quality (surveys): Concerns around air quality monitoring have been raised by other IPs and responded to by the Applicant. For example, please see the Applicant's response to REP2-042, Table 2.1 of the **Applicant's comments on Written Representations: Part 2 – Other Interested Parties (Volume 11.3) [REP3-039].** Further clarifications were provided in the Applicant's response to an ExA question, see AQHH.1.2 **of the Applicant's response to the ExA's Written Questions (ExQ1) (Volume 10.2) [REP2-019].** In summary, Section 8.4 of the **ES Chapter: 8 Air Quality (Volume 6.2) [APP-035]** reports on the date gathering methodology. The Applicant established, with the agreement of Cambridgeshire County Council, a network of local air quality monitoring sites. Project specific air quality monitoring was carried out from 2020-2022 as detailed in paragraph 8.4.1 of Environmental Statement: Chapter 8 – **Air Quality [APP-035]**, however this data was not used alone to characterise baseline air quality. Monitoring data collected by Fenland District Council (FDC) as part of the Local Air Quality Management (LAQM) regime was also used, as detailed in Section 3 of **Environmental Statement Appendix 8B: Air Quality Technical Report Revision: 3.0 (Volume 6.4) [REP2-006]**. Nitrogen dioxide (NO_2) diffusion tube data is provided up to and including 2019 in Table 8B3.4. This data is therefore representative of air quality before the COVID-19 lockdowns in 2020. The Applicant has agreed an **Outline Local Air Quality Monitoring Strategy (Volume 9.21) [REP4-015]** with the host local authorities and this will ensure that any air quality impacts can be identified when they occur and then appropriately mitigated. This is secured by Requirement 27 of the **draft DCO (Volume 3.1), Rev 5 [REP6-003]**.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			All EfW facilities in England require an Environmental Permit (EP) from the Environment Agency (EA) to operate. The EP application has been submitted and the EP will set the emission limits for the facility and require the Applicant to continuously monitor the emissions and submit results to the EA. An assessment of the Best Available Technology (BAT) for the plant is included in the EP submission. The BAT Assessment concludes that selective non-catalytic reduction (SNCR) represents the BAT option for the proposed EfW CHP Facility to ensure that significant effects on air quality do not occur. Adequacy of Consultation: The Applicant refers to: • the response at Deadline 6, see **GCT.2.7, Table 3.1, Applicant's comments on the responses to the ExA's Written Questions (ExQ2), (Volume 15.5) [REP6-027]; and** • Response to REP2-046 in **Table 2.1, Applicant's comments on Written Representations: Part 2 – Other Interested Parties (Volume 11.3) [REP3-040]**. In summary, the Applicant has confirmed that the necessary information was provided in accordance with the requirements of the Planning Act 2008 and associated regulations (including the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017). Having reviewed the matter of the adequacy of consultation, PINS accepted the DCO Application for the Proposed Development for Examination, see **Notification of Decision to Accept Application [PD-001].** Full details of the Applications statutory and non-statutory pre-application consultation are reported in the **Consultation Report (Volume 5.1) [APP-018]** and the accompanying appendices.
IP03 (REP6-050)	Interested Party	Angela Brennan-Glass	Traffic and Transport: Concerns regarding the impacts of traffic on the road network have been raised by a number of IPs and are addressed in, for example, the **Applicant's Comments on the Relevant Representations [REP1-028 to 035] and Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 3 and the Applicant's Response (Volume 15.10) [REP6-032]**.

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			In summary, the environmental impacts of the Proposed Development including HGV traffic associated with construction and operation, have been assessed and reported in **ES Chapter 6 Traffic and Transport (Volume 6.2), [APP-033]** accompanied by **Appendix 6B Transport Assessment (TA) [APP-073].** The Proposed Development also includes for improvements to New Bridge Lane which include for widening, a footpath, pedestrian crossing points and reducing the road speed from the national speed limit to 30mph. Embedded mitigation would be delivered via a suite of management plans, including the **Construction Traffic Management Plan (CTMP) [REP5-022]** – secured by Requirement 11, **Draft DCO [REP5-006] Operational Traffic Management Plan (OTMP) [REP3-025]** including route restrictions to reduce impacts to Wisbech Town and surrounding villages – secured by Requirement 12, **Draft DCO** and an **Operational Travel Plan [APP-074]** – secured by Requirement 15, **Draft DCO**. The Outline CTMP also sets out the process of surveying and repairing any damage made to the highway as a result of the construction works. The assessment concludes that there will be no significant residual effects resulting from the increase in HGV traffic. Waste hierarchy (recycling): Concerns regarding the waste hierarchy and recycling have been raised by a number of IPs and are addressed in, for example, the **Applicant's Comments on Written Representations: Part 2 Other Interested Parties (Volume 11.3) [REP3-040].** In summary, the Applicant fully supports the reduction of waste, reuse of waste and recycling of waste and it must be stressed that the Proposed Development will not prevent or prejudice waste reduction, reuse or recycling. This will be controlled by the Environmental Permit required by the EfW CHP Facility that sets out the waste categories that it can accept, and by Requirement 14 of **Draft DCO [REP5-006]**, that requires that a scheme must be submitted to the relevant planning authority that sets out how the Applicant will implement measures to maintain the waste hierarchy. It is considered that the Proposed Development will support the implementation of the waste hierarchy – a cornerstone of England's waste management policy and legislative framework – by diverting waste from continued management at the bottom of the waste

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			hierarchy (i.e., landfill) up the hierarchy, to be managed at the level of recovery, in the form of electricity recovered from it. As an example, Cambridgeshire currently landfills around 220,000 tonnes of waste per annum which is suitable for treatment at the Proposed Development. The Proposed Development would move the treatment of this residual waste up the waste hierarchy see response to Appendix 1 Comments on Planning Statement, Table 3.1, **Applicant's Comments on Written Representations: Part 2 Other Interested Parties (Volume 11.3) [REP3-040]**. General: The Proposed Development has been the subject of extensive environmental assessment, the results of which are reported within the **Environmental Statement (Volumes 6.2-6.4)** and summarised within the **Non-Technical Summary (Volume 6.1) [APP-027]. The Planning Statement (Volume 7.1) [APP-091]** considers the outcome of the ES and assesses conformity with national and local planning policy. The planning balance for the Proposed Development concludes it is firmly in favour of the Proposed Development. Therefore, development consent should be granted.
IP04 (REP6-052)	Interested Party	Derek Bull	Vehicle numbers and related environmental effects: The Applicant has assessed the impact of vehicle numbers upon the surrounding road network during both the construction and operational phases. The results are provided within **ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033]**. The modelling demonstrates that the road network can satisfactorily accommodate the number of vehicles proposed. Both National Highways and the local highway authorities agree with the Applicant's conclusions (**SOCG between Medworth CHP Ltd and National Highways (Draft) REP1-049)** submitted at Deadline 7 as Final and **SOCG between Medworth CHP Ltd and the Host Authorities (Draft) Rev3.1 REP6-019**) submitted as **Volume 9.4A and B** at Deadline 7. Transportation of IBA and APCr: Please refer to the **ExA's Written Questions (ExQ1) – Appendix 10.2B Technical Note: IBA and APCr Sites and Capacity [REP2-019]** and **Applicant's response to ExQ1 PND**

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			1.2 in the Applicant's Response to the ExA's Written Questions (ExQ1) [REP2-019]. In summary the IBA and APCr will be transported from the EfW CHP Facility Site in suitable HGVs to licenced facilities for further treatment (IBA) or treatment/landfill (APCr). Agricultural land – food production: Matters relating to the impact on food production on nearby agricultural land have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response RR-005 **(Volume 9.2) [REP1-029] and** HH01, **Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 3** and the **Applicant's Response (Volume 15.10) [REP6-032]**. In summary, a Human Health Risk Assessment (HHRA), **ES Appendix 8B: Air Quality Technical Report, Annex G (Volume 6.4) (Revision 3) [REP2-006]** has been prepared which considers the potential effects arising from chimney emissions upon humans. The Assessment assumes that the receptors would eat food grown in the local area and considers potential impacts from the bioaccumulation of, for example, polychlorinated dibenzofurans (PCDD/Fs) and dioxin-like PCBs in the food chain. The assessment concludes that potential effects are not significant. Flood Risk: Please refer to the response FR03 in the **Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response [REP1-056]** and the response at ID29, below. Landscape and Visual Impact: The matters raised in relation to the impact on views and the landscape, particularly the Fens, have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-032 **(Volume 9.2) [REP1-029].** To confirm, the maximum height of the chimneys is 90m above finished floor level, see Section 3.4.25 of the **ES Chapter 3: Description of the Proposed Development [APP-030].** Please refer to the **Applicant's Written Summary of Oral Submissions from ISH6, provided at Deadline 6**, for a full explanation of the extent to which the Proposed

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			Development will be visible, and the role of shelterbelts and existing vegetation in blocking and reducing visibility. **ES Chapter 9 Landscape and Visual [APP-036]** provides a full review of the visibility of the Proposed Development from a series of viewpoints agreed with the host local authorities. Photomontages showing the Proposed Development from these viewpoints can be found in the **Figures to Chapter 9, [APP-054 to APP-061]**. In summary, the LVIA assessed the effects of the Proposed Development on 19 local landscape character areas/types all of which lie within NCA 46 - The Fens. The assessment concluded that there would be the potential for locally significant effects within the Wisbech Settled Fen LCA closest to the EfW CHP Facility. No other significant landscape effects were identified as reported in paragraphs 9.9.2 to 9.2.20 of **ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036].** Carbon Capture: The Applicant has given consideration to carbon capture and the Proposed Development will be carbon capture and export ready in the way in which it is built, and in the way in which land has been reserved within the EfW CHP Facility Site to accommodate the necessary technology (the carbon capture and export readiness space). DCO Requirement 22 requires the Applicant to construct the EfW CHP Facility in accordance with carbon capture and export embedded design measures and to retain the readiness space whilst Requirement 23 requires the regular submission of a carbon capture readiness monitoring report to set out the consideration it is giving to the implementation of carbon capture. Filter replacement: Reliable, high efficiency and long-life fabric filters will be employed at the EfW CHP Facility. MVV has many years of experience operating with this type of filter, both in Germany and the UK. Annual visual inspection of the fabric filter bags will be conducted, as well as periodic exchange of single filter bags for laboratory analysis of those removed. In addition, dust monitors will be installed in the chimneys, providing easy identification of increased particulate matter trends which may be the result of failing fabric filter bags.

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			Using these techniques, the Applicant considers it entirely feasible that the fabric filter bags could remain in operation for a period of approximately 12 years. Research on EfW facilities in Italy1 has demonstrated that particulate matter removal efficiencies of 99.99% can be achieved, even for ultrafine particulate matter (generally defined as particulate matter with an aerodynamic diameter less than 0.1µm). Therefore, the Applicant is confident that the use of reliable high efficiency fabric filtration will ensure very low emissions of particulates, including PM2.5. *[1]Buonann0 G., Stabile M. and Tirler W. (2011) Ultrafine particle emission from incinerators: the role of the fabric filter'. Journal and Air and Waste Management Association, 62, 103-111*. Boston Alternative Energy Facility DCO approval: The Applicant refers to the response at IP01.
IP05 (REP6-053)	Interested Party	Diana Mutimer	Anglian Water's position on water availability: Please refer to response WI03, **Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 3 and the Applicant's Response (Volume 15.10) [REP6-032]**. In summary, submitted at Deadline 5, the Applicant's **Water Supply Availability Assessment (Volume 14.8) [REP5-039]** confirms, the existing connection capacity is sufficient to provide the construction and day-to-day water supply needs. Anglian Water has confirmed the availability of water resources to supply the day-to-day baseline requirement when the facility is commissioned in Q1 2027. Submitted at Deadline 6, the signed **Statement of Common Ground between Medworth CHP Ltd and Anglian Water [REP6-021]** provides the final agreed position. Severe flooding events: The Applicant has prepared a Flood Risk Assessment (ES Chapter 12 Hydrology Appendix 12A (Volume 6.4) [APP-084]. This was prepared in consultation with the Environment Agency. The statement of common ground between the Applicant and

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Environment Agency confirms that it is satisfied with the conclusions of the FRA such that the Proposed Development would not create flooding and that it would be flood resilient. (**SOCG between Medworth CHP Ltd and Environment Agency [REP4-010].**
IP06 (REP6-055)	Interested Party	Dr U Waverley	Historic environment: The concerns relating to historic environment have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response RR-032 **(Volume 9.2) [REP1-029]** and REP2-067 in Table 2.1 of the **Comments on Written Representations: Part 2 – Other Interested Parties (Volume 11.3) [REP3-040]**. In summary, the impact of the Proposed Development on the historic environment including listed buildings within the local area is presented in **ES Chapter 10: Historic Environment (Volume 6.2) [APP-037]**. The assessment concludes that there would be no significant effects on listed buildings (or upon conservation areas). The **Statement of Common Ground between Medworth CHP Limited and Historic England (Volume 9.12) [REP1-046]** conforms there are no objections on heritage grounds. Waste Need and Proximity principle: An updated version of the **Waste Fuel Availability Assessment (WFAA) Rev 3 (Volume 7.3) [REP5-020]** was submitted at Deadline 5 and a further note to clarify points was submitted at Deadline 6, see **Appendix C, Briefing Note – Waste Fuel Availability Assessment Refined, Written Summary of the Applicant's Oral Submissions at ISH7 (Volume 15.3) [REP6-025].** The WFAA provides a clear and robust case of need – and one which is based upon a range of up to date, publicly available, credible and rigorously examined data sources. This has continued to conclude that there is insufficient existing or planned residual waste management capacity available to ensure that residual, non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). The WFAA (Rev 3) demonstrates that the Proposed

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			Development would not result in an overcapacity of waste management at either a local or national level. The focus of the Applicant's assessment is on the diversion of non-recyclable residual waste from being managed at the bottom of the waste hierarchy in landfill. The Proposed Development would not divert waste from any means of management other than from landfill or exportation (which are both covered in some detail in the **WFAA Rev 3)** due to the scope of its Environmental Permit limiting the waste that can be accepted by the EfW CHP Facility. Agreed with Cambridgeshire County Council, Requirement 29 in Schedule 2 of the **draft DCO Rev 4 (Volume 3.1) [REP5-006],** subsequently **Rev5 [REP6-003]** secures controls on the origin of waste, ensures that the Proposed Development complies with the proximity principle and also ensures that the capacity the Proposed Development provides will be available to all local waste planning authorities. Agreed with Cambridgeshire County Council, Requirement 14 in Schedule 2 of the **draft DCO Rev 4 (Volume 3.1) [REP5-006]** subsequently **Rev5 [REP6-003]** confirms that a scheme must be submitted to the relevant planning authority that sets out how the Applicant will implement measures to maintain the waste hierarchy. Alternatives and site selection: Matters relating to the siting of the Proposed Development have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response RR-034 and RR-201 **(Volume 9.2) [REP1-029]** and **[REP1-030]** respectively. In summary, the Applicant considered a range of site selection criteria when selecting the location of the Proposed Development. This is explained in **Section 2.3.1 to 2.3.3 ES Chapter 2 Alternatives (Volume 6.2) [APP-029]** and **ES Chapter 3 (Volume 6.2) [APP-030]**. Health and sensitive receptors: The concerns relating to pollution, particularly on schools and other sensitive receptors, including residential properties have been raised by other IPs and responded to by the

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			Applicant. For example, see the Applicant's response to RR-026 and RR-033 **(Volume 9.2) [REP1-029]**. The **ES Chapter 16: Health (Volume 6.2) [APP-043]** has adopted a 'source-pathway-receptor' approach and has been informed by other ES Chapters, principally: • **Chapter 6: Traffic and Transport (Volume 6.2) [APP-033];** • **Chapter 7: Noise and Vibration (Volume 6.2) [APP-034];** • **Chapter 8: Air Quality (Volume 6.2) [APP-035];** • **Chapter 9: Landscape and Visual (Volume 6.2) [APP-036]; and** • **Chapter 15: Socio-economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042].** In summary, the assessment of health is presented in **ES Chapter 16 Health (Volume 6.2) [APP-043]**, it concludes that, with a range of mitigation measures embedded into the draft **DCO [REP6-???]** and Environmental Permit there will be no significant adverse health effects. **The Human Health Risk Assessment (HHRA), ES Appendix 8B: Air Quality Technical Report, Annex G (Volume 6.4) (Revision 3.0) [REP2-006]** considers the potential effects arising from chimney emissions upon humans. The assessment concludes that potential effects are not significant. The UKHSA **[RR-023]** notes within its relevant representation that it is satisfied that the Proposed Development would not result in any significant adverse impact on public health. This is confirmed within the **Statement of Common Ground between Medworth CHP Limited and the UK Health Security Agency (Volume 9.8) [REP2-013].** <u>Air quality and health:</u> The Applicant has responded to concerns raised in relation to air quality within their response to the relevant representations for example, see the Applicant's response to RR-031 **(Volume 9.2) [REP1-029]** and most recently in response HH01 and HH02 **in the**

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Summary of Oral Submissions made by Interested Parties at Open Floor Hearing 3 and the Applicant's Response (Volume 15.10) [REP6-032] In summary, the environmental impacts of the Proposed Development including air quality have been assessed. **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]** includes detailed dispersion modelling from the chimney and includes traffic modelling of HGVs during construction and operation, to predict potential impacts on human and ecological receptors. The air quality assessment was undertaken considering air quality objectives for a series of pollutants including metals and particulate matter (PM), set for the protection of human health and ecological sites and concludes that effects are not significant. The Applicant has agreed an **Outline Local Air Quality Monitoring Strategy (Volume 9.21) [REP4-015]** with the host local authorities and this will ensure that any air quality impacts can be identified when they occur and then mitigated. This is secured by Requirement 27 of the **draft DCO (Volume 3.1), Rev 5 [REP6-004]**. All EfW facilities in England require an Environmental Permit (EP) from the Environment Agency to operate. The EP application has been submitted and that process will set the emission limits for the facility and requires an operator to continuously monitor the emissions and submit results to the EA. Air quality (high emissions): The Applicant refers to the response above. In addition, in response to the IP's reference to 'high emissions' the Applicant considers that the waste specification, controlled through contractual requirements with waste suppliers, will ensure a low and stable content of mercury in the waste, whilst the use of activated carbon in the air pollution control (APC) system will further ensure a low and stable level of mercury emissions. Consequently, in accordance with footnote 8 of BAT 4, the Applicant is proposing to monitor mercury emissions using periodic extractive techniques in preference to continuous monitoring. The emissions performance of the EfW CHP Facility, with respect to mercury emissions, and demonstration of low and stable emissions, will follow the Environment Agency's Mercury Monitoring Protocol in the UK Interpretation Document for the 2019 Waste incineration BAT Conclusions (or otherwise agreed with the Environment Agency) with six, separate (i.e., samples taken on different days) extractive mercury results obtained during commissioning or, alternatively, a minimum of two tests

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			per month will be taken until six results are available. If the six results are all < 10µg/Nm3, continuous monitoring of mercury will not be considered necessary. Similar procedures will also apply to emissions of PCDD/Fs where, as per the Environment Agency's PCDD/F Monitoring Protocol in the UK Interpretation Document for the 2019 Waste incineration BAT Conclusions, if six separate extractive test results are less than the ELV, continuous sampling will not be considered necessary. Planned shutdowns would be once annually and further unplanned shutdowns may occur once per additional quarter. The Applicant does not consider shutting down four times a year frequent. During startup, the air pollution control systems would be in operation prior to the combustion of waste and, during shut down, they would remain in operation until all waste remaining on the grate has combusted. Furthermore, during start up the fabric filter would be precoated with lime and activated carbon to minimise the potential for elevated dioxin and heavy metal emissions during the early phases of startup. Published papers of health impacts and UK HSA position statement: To inform the Environmental Statement (ES), the Applicant consulted Public Health England (PHE) (now UK Health Security Agency). PHE confirmed in their response dated 17 August 2021 that: *"…Regarding emissions to air from municipal energy from waste developments, PHE has reviewed published research to examine the suggested links between emissions from municipal waste incinerators and effects on health (https://www.gov.uk/government/publications/municipal-waste-incinerators-emissions-impact-on-health). PHE's risk assessment remains that modern, well run and regulated municipal waste incinerators are not a significant risk to public health. While it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small..."* The UKHSA **[RR-023]** notes within its relevant representation that it is satisfied that the Proposed Development would not result in any significant adverse impact on public health. This is confirmed within the **Statement of Common Ground between Medworth CHP Limited and the UK Health Security Agency (Volume 9.8) [REP2-013].**

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Amenity (inc. noise): The operation of the Proposed Development is not anticipated to result in any significant effects on sensitive receptors during operation with respect to loss of amenity, light and noise pollution, vibration as confirmed **in ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034]** and **ES Chapter 16 Health (Volume 7.2) [APP-043**]. Embedded mitigation, including the **Outline Lighting Strategy (Volume 6.4) [APP-071]** secured in Requirement 18 of the **draft DCO (Volume 3.1) (Rev 5**) **[REP6-003]** and the **Outline Operational Noise Management Plan (Volume 6.4) [REP1-013]** secured in Requirement 19 of the **draft DCO (Volume 3.1) (Rev 5) [REP6-003]** would ensure that the effects are not significant. Suitability of the technology: Concerning the suitability of the proposed technology, the Application refers to the **Technical Note: Alternative Technology (Volume 12.8) REP4-027]**. In summary this document summarises the development status of alternative waste treatment technologies in the UK, demonstrates why these are not suitable for residual waste, and affirms why the Applicant continues to select conventional EfW technology as the best form of treatment. Delivery of mitigation: Mitigation and measures to control the Proposed Development are identified in the **ES (Volume 6.4)** and are secured in the **draft DCO Rev 5 (Volume 3.1) [REP6-003]**. Please refer to the draft DCO for full details, but these include: • Schedule 1 – lists the approved development ("Works No's.") i.e., what can be constructed; • Schedule 2 – lists the Requirements that are to be implemented including the submission of detailed management plans; • Schedule 13 – lists the documents and plans that are certified; and • Schedule 14 – lists the maximum and minimum design parameters i.e., how high can the chimneys be (90m above finished floor level). Abnormal Loads: Details of the management of abnormal loads during construction are summarised in the **Outline Construction Traffic Management Plan (Volume 6.4) [REP5-012]**. Full details are secured by Requirement 11 of the **draft DCO (Volume 3.1)**

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			[REP6-003] and will require engagement with the highway stakeholders and if necessary, the police to ensure safe transit of abnormal loads. Medical/hazardous waste: The Proposed Development will require an Environmental Permit to operate. Under the provisions of this permit the Proposed Development will seek permission to accept non-hazardous household, commercial and industrial waste. For further information see "Fuel Scope" in the **Waste Fuel Availability Assessment (WFAA) (Volume 7.3) [REP5-019]**. In summary, hazardous waste including medical waste will not be treated at the EfW CHP Facility. IBA/APCr: The Applicant refers to the response at ID04. HGV route restrictions: The Applicant refers to the response at IP02. Traffic and Transport: The Applicant refers to the response at IP03. State of roads/subsidence: The Applicant refers to the response at IP04. Agricultural land – food production: The Applicant refers to the response at IP04. Landscape and Visual Impact: The Applicant refers to the response at IP04. Monitoring of emissions at the EfW CHP Facility: The Applicant refers to the response at IP27. Anglian Water's position on water availability: The Applicant refers to the response at ID05. Flood Risk: The Applicant refers to the response at IP04. Boston Alternative Energy Facility DCO approval: The Applicant refers to the response at IP01.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Climate: The Applicant refers to the response at IP01. Waste hierarchy (recycling): The Applicant refers to the response at IP03. The Proposed Development is consistent with the waste hierarchy in that it will only receive waste that is non-recyclable. Instead, it will divert non-recyclable waste from landfill moving its treatment up the waste hierarchy. This is compliant with relevant national and local planning policy as set out within the **Planning Statement (Volume 7.1) [APP-091]** section 4.2.
IP07 (REP6-057)	Interested Party	Helen Pentelow	Impacts to Business around Algores Way Industrial Estate: Please refer to the **Applicant's Response to CAH2 Action Point 6 (Volume 14.5) [REP5-036]**. This document provides a summary and evidence of statutory and non-statutory communications with business owners around Algores Way. The Applicant refers to the response at **CA.2.6, ExQ2, Applicant's comments on the responses to the ExA's Written Questions (ExQ2) (Volume 15.5) [REP6-027]**. Following a meeting on the 29 June 2023 with the business owners on and around Algores Way, the Applicant prepared and issued a post meeting document (**Appendix C** of **Volume 15.5 [REP6-027])**. This document was aimed to assist attendees at the meeting in locating the relevant documents, updates and actions taken by the Applicant as a result of the examination process and further consultation during the examination period. The Applicant continues to be available for further meetings. Alternatives and site selection: The Applicant refers to the response at IP06. Amenity (inc. noise and vibration): The Applicant refers to the response at IP06. The Applicant assessed the potential for noise and vibration effects to a number of representative receptors surrounding the Proposed Development site. The results are presented within **ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034]. Figure 7.1 (Volume 6.4) [APP-051]** identifies the location of the receptors and confirms that the three properties on Algores way closest to the EfW CHP Facility (and hence with the greatest potential to experience a significant effect) were considered within the assessment. Effects upon non-residential receptors (including the three properties referenced) were assessed as being not significant.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Historic environment: The Applicant refers to the response at IP06. Traffic and Transport: The Applicant refers to the response at IP03. Landscape and Visual Impact: The Applicant refers to the response at IP04. Boston Alternative Energy Facility DCO approval: The Applicant refers to the response at IP01.
IP08 (REP6-040)	Interested Party	Icon Engineering	Odour: The matters raised in relation to potential odour have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-079 **(Volume 9.2) [REP1-029] and** AQHH.2.1 in the **Applicant's response to the ExA's Written Questions ExQ2 [REP5-032]**. In summary, the environmental impacts of the Proposed Development including those that could affect the local community, such as odour, have been assessed and reported in the ES and summarised in the **Non-Technical Summary (Volume 6.1) [APP-027].** The Applicant has prepared an **Outline Odour Management Plan (Volume 7.11) (Revision 2.0) [REP1-021-112]**, secured in Requirement 16 of the **Draft DCO (Volume 3.1) (Rev 5) [REP6-003]** which details all sources of odour, control measures, monitoring, including a complaints procedure, and reporting. Socio-economic and community benefits: Concerns relating to the impacts on employment, tourism and local business have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-035 **(Volume 9.2) [REP1-029**]. In summary, **ES Chapter 15: Socio-Economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042]** assesses impacts on local businesses and residents and concludes that there will not be significant negative effects. Where necessary, embedded mitigation is included within the design of the Proposed Development and ongoing operational management plans will ensure that the EfW CHP Facility will continue to be operated appropriately.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			The Applicant has prepared an **Outline Employment and Skills Strategy (Volume 7.8)** [APP-099], secured in Requirement 21 of the **draft DCO (Volume 3.1) (Rev 3)** which outlines measures to secure local employment. Following negotiations with Cambridgeshire County Council, Fenland District Council and Norfolk County Council, at Deadline 6 the Applicant submitted agreed heads of terms for a section 106 agreement (**Section 106: Heads of Terms (Volume 15.8) [REP6-031]**) to secure a public right of way (PROW) contribution for improvements and enhancements to the existing PROW and local road NMU connectivity network within: • Wisbech; • Wisbech St Mary; • Elm; and • Emneth. The PROW Contribution shall be used for: • Dedicated project officer resource; • Public path creation agreements and public path orders and associated costs; • Improvements to existing public rights of way and NMU links; and • Permissive path creations and improvements. Additionally, the Applicant and aforementioned host authorities have reviewed the Applicant's **Outline Community Benefits Strategy (Volume 7.14) [APP-105]** and after detailed discussions, agreed to establish a community fund that would operate over the lifetime of the Proposed Development. Proposals for the scope, governance and eligibility criteria for this fund are included at **Appendix B of the Outline Community Benefits Strategy Rev 2.0 (Volume 7.14) [REP6-014]**. The community fund will be secured via a separate agreement with Cambridgeshire County Council pursuant to section 111 of the Local Government Act 1972. The Applicant is keen to continue working in partnership with Local Authorities, local educational establishments, and local community groups to refine and prepare the detailed Community Benefits Strategy to ensure that the community benefits provided are relevant to the local area in and around Wisbech. The final Community Benefits Strategy could include:

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			• Establishment of a sponsorship fund; • Support for local initiatives that improve wellbeing, such as Active Fenland's 'Wellbeing Walks' and other networking groups, Community Interest Companies; and • Support to other events and organisations, such as those described above, with the aim of reducing litter and supporting further environmental improvements in the local area. Impacts to Business around Algores Way Industrial Estate: The Applicant refers to the response at IP07. Traffic and Transport: The Applicant refer to the response at IP03. Air quality and health: The Applicant refer to the response at IP06. Health and sensitive receptors: The Applicant refer to the response at IP06. Employment and Skills: The Applicant refer to the response at IP02. Anglian Water's position on water availability: The Applicant refer to the response at ID05. Alternatives and site selection: The Applicant refer to the response at IP06. Boston Alternative Energy Facility DCO approval: The Applicant refer to the response at IP01.
IP09 (REP6-058)	Interested Party	Isobel Clarke	Landscape and Visual Impact: The Applicant refers to the response at IP04. Socio-economic and community benefits: The Applicant refers to the response at IP08. With regard to the Proposed Development deterring visitors, the Secretary of State's Scoping Opinion confirmed that direct tourism effects could be scoped from the environmental assessment. The **ES Chapter 15: Socio-economic Tourism, Recreation**

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			and Land Use (Volume 6.2) [APP-042] therefore considered indirect effects only concluding that they would not be significant. Employment and Skills: The Applicant refers to the response at IP02. Traffic and Transport: The Applicant refers to the response at IP03. Historic environment: The Applicant refers to the response at IP06.
IP10 (REP6-059)	Interested Party	The Gowers	House Prices: Please refer to response to REP2-055 in **Table 2.1, Applicant's comments on Written Representations: Part 2 – Other Interested Parties (Volume 11.3) [REP3-040].** In the document, the Applicant referenced **ES Chapter 15: Socio economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042]** which includes a review of the local housing market. The assessment concludes that the Proposed Development would not by itself decrease house prices in the Study Areas, having regard to the proposed mitigation measures which include a commitment to encourage local employment via implementation of the **Outline Employment and Skills Strategy (Volume 7.8) [APP-099].** Biodiversity: The matters raised in relation to impacts on biodiversity have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-082 **[REP1-029]** and LM04, Table 7.1, **Applicant's comments on the Deadline 4 Submissions: Part 2 Other Interested Parties (Volume 14.4b) [REP5-035]**. In summary, **ES Chapter 11: Biodiversity (Volume 6.2) [AS-008]** provides an assessment of effects on the natural environment including protected sites, habitats and species. No potential negative significant effects have been identified. Mitigation would be secured via the **Outline Landscape and Ecology Management Strategy (Figure 3.14) [APP-049]** and the **Landscape and Ecology Management Plan (Rev 2)** secured by Requirement 5, Schedule 2, **Draft DCO [REP3-007].** The Applicant is also committed to biodiversity net gain and has prepared a strategy, see **ES Chapter 11 Biodiversity Appendix 11M, (Volume 6.4) [REP5-016].** This states that the Applicant will achieve a minimum 10% net

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			gain. This commitment is secured by Requirement 6 of the **draft DCO (Volume 3.1) [REP6-003]**. Status of IBA and APCr: The matters raised in relation to status and handling of IBA and APCr has been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-211 **[REP1-30] and Appendix 10.2B Technical Note: IBA and APCr Sites and Capacity [REP2-019]** and **Applicant's response to ExQ1 PND 1.2 in the Applicant's Response to the ExA's Written Questions (ExQ1) [REP2-019]**. In summary Incinerator bottom ash is an inert, non-hazardous, by-product of the combustion process. It will be removed and sent to a licenced facility for recycling, where the ferrous and non-ferrous metals will be removed and the remainder processed by size for use as secondary aggregates, thereby negating the requirement to quarry for virgin aggregate. The Air Pollution Control Residues (APCr) are a hazardous waste and are therefore stored in sealed silos and collected in sealed containers, then transported to a fully licenced facility for treatment and disposal. The Applicant, together with other companies in the industry, are actively investigating the potential to recycle the APCr for use in construction and civil engineering projects, see **Appendix 10.2B** for further details. Air quality and health: The Applicant refers to the response at IP06. Agricultural land – food production: The Applicant refers to the response at IP04. Protected Species: The Applicant refers to the response at IP29. Biodiversity: The Applicant refers to the response at IP09. Socio-economic and community benefits: The Applicant refers to the response at IP08. Waste hierarchy (recycling): The Applicant refers to the response at IP03. Health and sensitive receptors: The Applicant refers to the response at IP06.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
IP11 (REP6-060)	Interested Party	Janet Thompson	Electricity generated by the Proposed Development: A significant amount of dispatchable electricity would be generated by the Proposed Development. Section 3.5.49 of the **ES Chapter 3: Description of the Proposed Development (Volume 6.4) [APP-030]** provides context to the amount of electricity generated by the Proposed Development. In summary, the electricity generated is equivalent to around 118,918 homes, which is approximately the same number of homes in Fenland and King's Lynn and West Norfolk. Historic Environment: The Applicant refers to the response at IP06. Traffic and Transport: The Applicant refers to the response at IP03. HGV route restrictions: The Applicant refers to the response at IP02. Landscape and Visual Impact: The Applicant refers to the response at IP04. Waste hierarchy (recycling): The Applicant refers to the response at IP03. Waste Need and Proximity principle: The Applicant refers to the response at IP06. Air quality and health: The Applicant refers to the response at IP06. Health and sensitive receptors: The Applicant refers to the response at IP06. Agricultural land – food production: The Applicant refers to the response at IP04. Biodiversity: The Applicant refers to the response at IP09. House Prices: The Applicant refers to the response at IP09. Climate: The Applicant refers to the response at IP01. Amenity (inc. noise and vibration): The Applicant refers to the response at IP06.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
IP12 (REP6-061)	Interested Party	Jenny Perryman	Transportation of hazardous loads: The Applicant refers to the response at agenda item 5n, in the **Applicant's Written Summary of Oral Presentations at ISH6 (Volume 15.2) [REP6-024]**. HGV emissions/alternative fuels: As accepted by the IP, the transportation of waste to the EfW CHP Facility by HGV's and the consequential vehicle emissions, has been assessed on a worst-case scenario basis, i.e., diesel emissions. Table 14.29 of the **ES Chapter 14: Climate (Volume 6.4) [APP-041]** summarises the emissions. Whilst not in their control, the Applicant supports the general direction of travel to find other fuel sources to power HGV's, such as, battery and hydrogen. Waste Need and Proximity principle: The Applicant refers to the response at IP06. Waste hierarchy (recycling): The Applicant refers to the response at IP03. Alternatives and site selection: The Applicant refers to the response at IP06. The **WFAA (Volume 3.1) [REP5-020]** demonstrates that in the Study Area served by the Applicant's Proposed Development (which excludes London) there is a requirement to process 2.4 million tonnes of residual waste which is currently managed at the bottom of the waste hierarchy. There is therefore a need for the EfW CHP Facility in the Study Area. The IP, throughout their submission, makes a number of points on waste composition and food waste and specifically expresses concern that due to potential changing waste composition, the removal of food waste and plastics from the residual waste stream will have an adverse effect on the calorific value of the waste feedstock and therefore on the efficiency of the plant. This issue has been addressed in the **WFAA (Volume 3.1) [REP5-020]** – specifically paragraph 5.2.15 and Appendix E. This demonstrates that whilst it is acknowledged that the removal of plastics and food waste from the municipal waste stream has the potential to affect the efficiency of energy from waste facilities, for the Study Area of the Proposed Development, the vast majority of Waste Collection Authorities already separately collect food waste and plastics. In this regard, the Applicant does not anticipate any substantial changes in the composition of the targeted waste

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			stream for the Proposed Development (and therefore, its efficiency is unlikely to be compromised).
IP13 (REP6-062)	Interested Party	Jo Barnard	Historic environment: The Applicant refers to the response at IP06. Landscape and Visual Impact: The Applicant refers to the response at IP04. Traffic and Transport: The Applicant refer to the response at IP03. Health: The Applicant has undertaken an Air Quality Assessment which includes a Human Health Risk Assessment (Volume 6.4) [APP-078]. This concludes that effects arising from the operation of the EfW CHP Facility, and as a result of traffic would not be significant. The conclusions are agreed with the host authorities (**SOCG between Medworth CHP Ltd and the Host Authorities Rev3.1 (Volume 9.4) [REP6-019**] submitted **as Volume 9.4A and B** at Deadline 7 and with the UK Health Security Agency (**SOCG between Medworth CHP Ltd and the UK Health Security Agency rev2 (Volume 9.8) [REP2-013].**
IP14 (REP6-063)	Interested Party	John Taylor	State of roads/subsidence: The matters raised in relation to the ongoing maintenance of the highway network have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-293 **[REP1-30]**. In summary the maintenance of the local road network is the responsibility of the local highways Authority. However, **Appendix 6A Outline CTMP (Volume 6.4) [REP3-025]** confirms the Applicant will appoint an independent contractor to undertake a highway condition survey of the highway before and after construction of the Proposed Development. Any damage caused by the construction activities can be repaired by the Applicant and the road returned to the previous condition. NSIP 50MW threshold: Assertions that the Proposed Development may not produce 50 megawatts (MW) of electricity have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-296 **(Volume 9.2) [REP1-031]**. In summary, this response explains that the amount of residual waste to be

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			processed at the EfW CHP Facility will generate in excess of 50MW of electricity. As a generating station with an electrical capacity exceeding 50MW, it is classified as a Nationally Significant Infrastructure Project under section 15 of the Planning Act 2008, and it requires development consent under the 2008 Act. CHP Customers: The Applicant provided a response to this matter at JP02 in **Table 5.1 in the** Applicant's comments on the Deadline 4 Submissions: Part 2 Other Interested Parties **(Volume 14.2b) [REP5-035]**, reproduced below. The Applicant has commissioned a Combined Heat and Power Assessment **[APP-097],** which was carried out by independent consultants. This indicates potential heat demand from using publicly available sources. The ability to supply heat to specific users will depend on a number of factors, such as total heat demand, peak heat demand, heat specification (temperature, pressure, water /steam, condensate return), distance from the Proposed Development etc. The inclusion of the former March-Wisbech railway land within the Order limits will secure that land for the CHP Connection in order to supply heat to any business whose boundary is adjacent to the CHP Connection Corridor. If heat is to be supplied to any other businesses in the area, not located adjacent the CHP Connection Corridor, the necessary infrastructure would be subject to a separate planning application or amendment to the development consent order. The Applicant will not divulge the contents or details of any commercially sensitive discussions with, nor reveal the names of, any potential heat offtakers. Existing energy usage data has been requested from a few potential heat offtakers, and some has been received. It should be recognised that unless and until the DCO is granted and recognising that heat would not be available until the Proposed Development has been commissioned (i.e., the first supply of heat is unlikely to be before mid-2027), it is unlikely that meaningful commercial discussions on heat supply will take place whilst the DCO application is being examined and determined. It should also be recognised that heat could be supplied in the future to offtakers that do not exist today but who may develop new industrial facilities in the area because of the availability of heat from the Proposed Development.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			In order to comply with national planning policy there is no requirement to have secured heat offtake agreements in advance of the grant of the DCO. There is a requirement to be able to supply heat at a future date through the initial design of the Proposed Development and this has been included, for example by including in the design of the steam turbine the ability to extract steam at appropriate pressures and temperatures. As required under Issue Specific Hearing 4, Action Point 6, the Applicant has submitted at Deadline 5 a Technical Note: **Combined Heat and Power Carbon Capture Delivery Readiness (Volume 14.7).** Reopening of the March to Wisbech Railway: The matters raised in relation to relationship between the Proposed Development and the potential reopening of the disused March to Wisbech Railway have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-028 **(Volume 9.2) [REP1-029]** and the response to REP2-049 in Table 2.1 of the **Applicant's comments on Written Representations: Part 2 – Other Interested Parties (Volume 11.3) [REP3-039]**. In summary, the Applicant has reiterated support for the reopening of the railway and is of the view that the Proposed Development will not compromise this aim. This is illustrated on Figure 3.17 of **ES Chapter 3 Description of the Proposed Development Figures (Volume 6.3) [APP-049].** Response **REP4-033** confirms the Applicant and Network Rail are in negotiations and the parties are close to reaching an agreement and within the timeframe of the Examination. HGV queuing: Please refer to response to REP2-069 in **Table 2.1, Applicant's comments on Written Representations: Part 2 – Other Interested Parties (Volume 11.3) [REP3-040]**. In summary, the location of the weighbridge/gatehouse is set back from New Bridge Lane to allow, if required, vehicle queuing within the EfW CHP Facility Site, consequently there would not be traffic backing-up onto the public highway (New Bridge Lane). Cumulative impacts: The matters raised in relation to cumulative impacts of the Proposed Development, including at residential receptors, such as 10 New Bridge Lane, have been raised by other

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			IPs and responded to by the Applicant. For example, see the Applicant's response to REP2-043 **Applicant's comments on Written Representations: Part 2 – Other Interested Parties (Volume 11.3) [REP3-010]** and further explanation at agenda Item 4 (including Appendix B) of the Applicant's **Written Summary of the Applicant's Oral Submissions at ISH7 (Volume 15.3) [REP6-025].** In summary, the Applicant's assessment of cumulative effects taking account of other projects is set out in **ES Chapter 18 Cumulative Effects Assessment (Volume 6.2) [APP-045]**. The methodology adopted to identify projects to include within the assessment is presented in Section 18.4 of the ES Chapter. The approach aligns with PINS Advice Note 17: Cumulative Effects Assessment. The projects screened into the assessment are set out in the Appendices to the main chapter **(Volume 6.4) [APP-090].** Amenity of the occupier of 10 New Bridge Lane: The performance of the proposed acoustic fence is questioned in relation to its ability to mitigate noise and visual effects. The Applicant has undertaken a **Residential Visual Amenity Assessment (Volume 6.4) [APP-079]** which concludes that 10 New Bridge Lane would not be affected to the extent that it would represent an unsatisfactory place to live. This conclusion is made recognising that **ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036]** does conclude that visual effects alone would be significant. Whilst the proposed acoustic fence may screen lower level activities the Applicant does recognise that it will not screen views to the upper parts of the EfW CHP Facility. The Applicant is however committed to implement a landscaping scheme along the frontage to New Bridge Lane. The acoustic fences' main function is to mitigate the effects of noise. Modelling undertaken by the Applicant and reported within **ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034]** confirms that with the fence in place, levels would be reduced to a level considered to be not significant. The assessment conclusions are agreed with the host authorities (**SOCG between Medworth CHP Ltd and the Host Authorities Rev3.1 [REP6-019]** submitted as **Volume 9.4 A and B** at Deadline 7**.** Impacts to Business around Algores Way Industrial Estate: The Applicant refers to the response at IP07.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Biodiversity: The Applicant refers to the response at IP09. Health and sensitive receptors: The Applicant refers to the response at IP06. Agricultural land – food production: The Applicant refers to the response at IP04. Air quality and health: The Applicant refers to the response at IP06. Alternatives and site selection: The Applicant refers to the response at IP06. Waste Need and Proximity principle: The Applicant refers to the response at IP06. Boston Alternative Energy Facility DCO approval: The Applicant refers to the response at IP01. Energy Facility DCO approval: The Applicant refers to the response at IP01. Waste hierarchy (recycling): The Applicant refers to the response at IP03. Biodiversity: The Applicant refers to the response at IP09. Socio-economic and community benefits: The Applicant refers to the response at IP08. Traffic and Transport: The Applicant refers to the response at IP03. HGV route restrictions: The Applicant refers to the response at IP02. Historic environment: The Applicant refers to the response at IP06. Traffic Surveys: The Applicant refers to the response at IP02. House Prices: The Applicant refers to the response at IP09.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
IP15 (REP6-065)	Interested Party	**Linda Seagroatt**	Vermin: The matters raised in relation to vermin have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to WF05 in the **Summary of Oral Submissions made by Interested Parties at Open Floor Hearing 3 and the Applicant's Response (Volume 15.10) [REP6-032]**. In summary, to monitor and control pests, insects and vermin, specialist firms will be contracted to undertake regular inspections of the EfW CHP Facility Site. Bait boxes will be maintained around the perimeter of the EfW CHP Facility if required. Landscape and Visual Impact: The Applicant refers to the response at IP04. HGV route restrictions: The Applicant refers to the response at IP02. Traffic and Transport: The Applicant refers to the response at IP03. Air quality and health: The Applicant refers to the response at IP06. Waste Need and Proximity principle: The Applicant refers to the response at IP06. CHP Customers: The Applicant refers to the response at IP14. Socio-economic and community benefits: The Applicant refers to the response at IP08. Employment and Skills: The Applicant refers to the response at IP02. Alternatives and site selection: The Applicant refers to the response at IP06. Historic environment: The Applicant refers to the response at IP06. Agricultural land – food production: The Applicant refers to the response at IP04. Boston Alternative Energy Facility DCO approval: The Applicant refers to the response at IP01. Waste hierarchy (recycling): The Applicant refers to the response at IP03.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Reopening of the March to Wisbech Railway: The Applicant refers to the response at IP14. Climate: The Applicant refers to the response at IP01.
IP16 (REP6-069)	Interested Party	Mervyn Sargeant - Hair World UK Ltd	Impacts to Business around Algores Way Industrial Estate: The Applicant refers to the response at IP07. Traffic and Transport: The Applicant refers to the response at IP03. HGV route restrictions: The Applicant refers to the response at IP02. State of roads/subsidence: The Applicant refers to the response at IP04. Landscape and Visual Impact: The Applicant refers to the response at IP04. Amenity (inc. noise): The Applicant refers to the response at IP06. Air quality and health: The Applicant refers to the response at IP06. Agricultural land – food production: The Applicant refers to the response at IP04. Socio-economic and community benefits: The Applicant refers to the response at IP08. Employment and Skills: The Applicant refers to the response at IP02. Waste hierarchy (recycling): The Applicant refers to the response at IP03. Boston Alternative Energy Facility DCO approval: The Applicant refers to the response at IP01. Cumulative impacts: The Applicant refers to the response at IP14.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Climate: The Applicant refers to the response at IP01. Vermin: The Applicant refers to the response at IP15.
IP17 (REP6-070)	Interested Party	Nadine Ridgewell	Impact on emergency services: The matters raised in relation to the impact on emergency services have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to REP2-056 **Applicant's comments on Written Representations: Part 2 – Other Interested Parties (Volume 11.3) [REP3-040]**. In summary, the Applicant has engaged with the East of England Ambulance Care Trust (and Cambridgeshire and Peterborough Integrated Care System) to discuss the Proposed Development and incorporated their mitigation requirements into the **Outline Construction Traffic Management Plan (Volume 6.4) [REP5-012] and Outline Operational Traffic Management Plan (Volume 7.15) [REP3-025]**. A signed **Statement of Common Ground between Medworth CHP Limited, the East of England Ambulance Service NHS Trust and Cambridgeshire and Peterborough Integrated Care System (Volume 9.11) [REP2-014]** confirms that all parties agreed that no significant effects would occur. Cambridgeshire Constabulary has not submitted a relevant representation in relation to the application. The Applicant has however prepared a Transport Assessment (**ES Chapter 6 Traffic and Transport Appendix 6B Transport Assessment Volume 6.4 [APP-073]**). This concludes that the Proposed Development would not lead to congestion on the local and strategic highway network. The Applicant's **Outline CTMP (Volume 6.4) [REP5-012],** updated for Deadline 7 and **Outline OTMP (Volume 7.15) [REP3-025]** include for the establishment of a liaison group. Through the local liaison group, the Applicant will provide advanced warning of any planned operational changes that may have the potential to affect the free flow of traffic on the surrounding highway network. Landscape and Visual Impact: The Applicant refers to the response at IP04. Amenity (inc. noise): The Applicant refers to the response at IP06. Health and sensitive receptors: The Applicant refers to the response at IP06.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Air quality and health: The Applicant refers to the response at IP06. Agricultural land – food production: The Applicant refers to the response at IP04. CHP Customers: The Applicant refers to the response at IP14. Flood Risk: The Applicant refers to the response at IP04. Landscape and Visual Impact: The Applicant refers to the response at IP04. Socio-economic and community benefits: The Applicant refers to the response at IP08.
IP18 (REP6-071)	Interested Party	Neil Elcome	Air quality and health: The Applicant refers to the response at IP06. Health and sensitive receptors: The Applicant refers to the response at IP06. Amenity (inc. noise): The Applicant refers to the response at IP06. Climate: The Applicant refers to the response at IP01. Socio-economic and community benefits: The Applicant refers to the response at IP08.
IP19 (REP6-072)	Interested Party	Nicola Sutheran	Significance of impacts: The technical guidance followed and approach examining the significance of impacts is summarised in Section 4.3 and 4.9 respectively of the **ES Chapter 4: Approach to EIA (Volume 6.4) [APP-031].** This approach is applied to the topic specific chapters within ES; a standard approach for EIA. Socio-economic and community benefits: The Applicant refers to the response at IP08. Air quality and health: The Applicant refers to the response at IP06. Biodiversity: The Applicant refers to the response at IP09.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Historic environment: The Applicant refers to the response at IP06. Amenity (inc. noise): The Applicant refers to the response at IP06. Agricultural land – food production: The Applicant refers to the response at IP04.
IP20 (REP6-077)	Interested Party	Rob Murphy	Boston Alternative Energy Facility DCO approval: The Applicant refers to the response at IP01.
IP21 (REP6-078)	Interested Party	Roger Thompson	Waste Need and Proximity principle: The Applicant refers to the response at IP06. Waste hierarchy (recycling): The Applicant refers to the response at IP03. HGV route restrictions: The Applicant refers to the response at IP02. Traffic and Transport: The Applicant refers to the response at IP03. Air quality and health: The Applicant refers to the response at IP06. Agricultural land – food production: The Applicant refers to the response at IP04. Landscape and Visual Impact: The Applicant refers to the response at IP04. Amenity (inc. noise): The Applicant refers to the response at IP06. House Prices: The Applicant refers to the response at IP09. Alternatives and site selection: The Applicant refers to the response at IP06.
IP22 (REP6-041)	Interested Party	Taylors Reclaims Ltd	The comments made by the IP are the same as those made by IP14 [REP6-063]. The Applicant refers to their response at IP14 response.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
IP23 (REP6-081)	Interested Party	Tom Howlett	CHP Customers: The Applicant refers to the response at IP14. Anglian Water's position on water availability: The Applicant refers to the response at IP05. CHP Customers: The Applicant refers to the response at IP14. Alternatives and site selection: The Applicant refers to the response at IP06.
IP24 (REP6-082)	Interested Party	Tony Wilson	HGV route restrictions: The Applicant refers to the response at IP02. Traffic and Transport: The Applicant refers to the response at IP03. CHP Customers: The Applicant refers to the response at IP14. Biodiversity: The Applicant refers to the response at IP09. Air quality and health: The Applicant refers to the response at IP06. Waste Need and Proximity principle: The Applicant refers to the response at IP06. Reopening of the March to Wisbech Railway: The Applicant refers to the response at IP14. Flood Risk: The Applicant refers to the response at IP04. Climate: The Applicant refers to the response at IP01.
IP25 (REP6-042)	Interested Party	UKWIN	See Table 2.2.
IP26 (REP6-043)	Interested Party	UKWIN	See Table 2.3.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
IP27 (REP6-083)	Interested Party	Valerie MacRae	Monitoring of emissions at the EfW CHP Facility: Please refer to the **Technical Note: Capture and Monitoring of Heavy Metals Appendix A of the Draft Written Summary of the Applicant's Oral Submissions at ISH1 (Volume 9.23) [REP1-057]**. In Summary, the EfW CHP Facility will have a sophisticated Air Pollution Control (APC) system for controlling emissions to air, designed to ensure compliance with the relevant emission limit values (ELVs) prescribed within the Industrial Emissions Directive (IED) and Best Available Techniques Associated Emission Levels (BAT-AELs). These ELVs will be specified in the Environmental Permit (EP). Landscape and Visual Impact: The Applicant refers to the response at IP04. Agricultural land – food production: The Applicant refers to the response at IP04. Historic environment: The Applicant refers to the response at IP06. Air quality and health: The Applicant refers to the response at IP06. HGV route restrictions: The Applicant refers to the response at IP02. Traffic and Transport: The Applicant refers to the response at IP03. Health and sensitive receptors: The Applicant refers to the response at IP06. Climate: The Applicant refers to the response at IP01.
IP28 (REP6-084)	Interested Party	Wayne Cook	The Applicant notes the IP's support for the Proposed Development.
IP29 (REP6-044)	Interested Party	WisWIN	Flood Risk/Sequential Test: Please refer to the response at EW.1.2 in the **Applicant's response to the ExA's Written Questions (EXQ1) (Volume 10.2) [REP2-019],** the Applicant's response to agenda item 5a in the **Written Summary of the Applicant's Oral Submissions at ISH5 (Volume 12.2c) [REP4-021] and** the **Applicant's response Summary of Oral Submissions**

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. In summary, the Applicant's consideration of alternative locations in the context of the sequential test is set out within the **FRA (ES Chapter 12 Hydrology, Appendix 12A FRA (Volume 6.4) [APP-084]** and summarised within the **Planning Statement (Volume 7.1) [APP-091]**. The Applicant did not identify any other available sites that met its essential site selection criteria, in particular the availability of potential CHP users, and that were located in either Flood Zone 1 or 2. Having applied the sequential test, the Applicant followed a sequential approach at the site level, consistent with NPS EN-1 paragraph 5.7.9, to identify compatible and non-compatible uses within the relevant flood zones. Therefore, the Flood Risk Assessment **(FRA) (Appendix 12A FRA Volume 6.4 [APP-084**]) was prepared in accordance with NPS EN-1, EN-3 and EN-5, the National Planning Policy Framework, and all other relevant national and local policy and guidance. Protected Species (spined loach/water voles): Please refer to the response at EI01 in the **Summary of Oral Submissions made by Interested Parties at Open Floor Hearing 3 and the Applicant's Response (Volume 15.10) [REP6-032] and** LW01 in the **Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response [REP1-056]**. In summary, in respect of spined loach, no significant effects were identified due to the distance between the Proposed Development and the watercourse within which spined loach are to be found. Concerning water voles, the Applicant has concluded discussions on the potential effects on water voles and has made an additional amendment to **ES Chapter 11 - Biodiversity Appendix 11M Biodiversity Net Gain (Clean) Rev 4.0 [REP5-015]** to refer specifically to water voles in the Annex C (Outline BNG Strategy). An updated version of this document (Rev 5.0) was submitted at Deadline 6 **[REP6-008].** The **SOCG between Medworth CHP Ltd and the Host Authorities Rev3.1 Draft (Volume 9.4) [REP6-019]** confirms that all matters concerning biodiversity are now agreed between the Applicant and CCC/FDC. A update of this document (**Volume 9.4A and B**) is provided at Deadline 7.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			General: The Proposed Development has been the subject of extensive environmental assessment, the results of which are reported within the **Environmental Statement (Volumes 6.2-6.4)** and summarised within the **Non-Technical Summary (Volume 6.1) [APP-027]. The Planning Statement (Volume 7.1) [APP-091]** considers the outcome of the ES and assesses conformity with national and local planning policy. The planning balance for the Proposed Development concludes it is firmly in favour of the Proposed Development. Therefore, development consent should be granted. Socio-economic and community benefits: The Applicant refers to the response at IP08. Nesting Turtle Doves: **ES Chapter 11 Biodiversity (Volume 6.2) [APP-038]** does acknowledge that there are records of turtle doves within the study area although none were found in the site surveys. Chapter 11 section 11.9 considers the potential to affect this species, together with all of the other Red List breeding birds recorded either in the desk study or through survey. The conclusion reached is that effects would not be significant.
IP30 (REP6-045)	Interested Party	Yvecourt Investments	The comments made by the IP are the same as those made by IP14 [REP6-063] and IP22 [REP6-041]. The Applicant refers to their response at IP14 response.
IP31 (REP6-085)	Interested Party	B. Fogarty	The IP appears to suggest that the Applicant has neglected to comply with standard planning considerations, including the carrying out of a 'mandatory water test', considering alternative sites in the locality and having regard to the cumulative effects of the Proposed Development in combination with other energy infrastructure proposed in the area. This is not the case. The Applicant refers to the **Planning Statement (Volume 7.1) [APP-091]** and to the **National Policy Statement Tracker (Volume 9.18)** submitted at Deadline 7, which set out its assessment as to how the Proposed Development complies with relevant national and local policy considerations. These documents confirm that the Applicant carried out both a Sequential Test and an Exceptions Test relating to flood risk and that it considered local policies applicable to both the Cambridgeshire and Norfolk areas, supported by a range of environmental assessments. **Chapter 2 of the Environmental**

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Statement (Volume 6.2) [APP-029] sets out how the Applicant has selected the site. The issue of alternatives was further discussed at ISH3 in May 2023 and a **Written Summary of the Applicant's Oral Submissions at ISH3 was submitted at Deadline 4 [REP4-019].** As explained at ISH3, the Applicant identified a number of essential and preferred siting criteria to identify the site at Wisbech, which at that time was already allocated for waste uses. The Proposed Development is a form of renewable energy development and the need for the development and the siting of the facility at Wisbech is evidenced in the **Waste Fuel Availability Assessment (Volume 7.3) [REP5-020**]. The Applicant has considered potential cumulative effects in the **ES Chapter 18 (Volume 6.2) [APP-045**] and the **Statement of Common Ground between the Applicant and the Host Authorities (Volume 9.4A and B)** submitted at Deadline 7 confirms that the local planning authorities are satisfied with the approach taken and agree that no significant inter-project cumulative effects would occur as a result of the Proposed Development.
NIP01 (REP6-047)	Non-Interested Party	Amanda Gower	Impact on emergency services: The Applicant refers to the response at IP17. Traffic and Transport: The Applicant refers to the response at IP03. State of roads/subsidence: The Applicant refers to the response at IP04. HGV route restrictions: The Applicant refers to the response at IP02. Historic environment: The Applicant refers to the response at IP06.
NIP02 (REP6-048)	Non-Interested Party	Ana Ferreira	The comments made by the IP are the same as those made by IP02 [REP6-049]. The Applicant refers to their response at IP02 response.
NIP03 (REP6-051)	Non-Interested Party	Anthony Foice-Beard	Agricultural land – food production: The Applicant refers to the response at IP04. Socio-economic and community benefits: The Applicant refers to the response at IP08. Cumulative impacts: The Applicant refers to the response at IP14.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Traffic and Transport: The Applicant refers to the response at IP03. Reopening of the March to Wisbech Railway: The Applicant refers to the response at IP14. Employment and Skills: The Applicant refers to the response at IP02. Air quality and health: The Applicant refers to the response at IP06. Health and sensitive receptors: The Applicant refers to the response at IP06. Adequacy of Consultation: The Applicant refers to the response at IP02. Socio-economic and community benefits: The Applicant refer to the response at IP08. Alternatives and site selection: The Applicant refer to the response at IP06. Waste hierarchy (recycling): The Applicant refer to the response at IP03.
NIP04 (REP6-054)	Non-Interested Party	Diane Hunt	Agricultural land – food production: The Applicant refers to the response at IP04. Air quality and health: The Applicant refers to the response at IP06. Traffic and Transport: The Applicant refers to the response at IP03. State of roads/subsidence: The Applicant refers to the response at IP04. HGV route restrictions: The Applicant refers to the response at IP02. Air quality and health: The Applicant refers to the response at IP06. Climate: The Applicant refers to the response at IP01.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
NIP05 (REP6-056)	Non-Interested Party	Hayley Johnson	Air quality and health: The Applicant refers to the response at IP06. Health and sensitive receptors: The Applicant refers to the response at IP06. Traffic and Transport: The Applicant refers to the response at IP03. Socio-economic and community benefits: The Applicant refers to the response at IP08.
NIP06 (REP6-064)	Non-Interested Party	Kerys Jordan	Socio-economic and community benefits: The Applicant refers to the response at IP08. Historic environment: The Applicant refers to the response at IP06. Traffic and Transport: The Applicant refers to the response at IP03. Traffic Surveys: The Applicant refers to the response at IP02. Air quality and health: The Applicant refers to the response at IP06. Impacts to Business around Algores Way Industrial Estate: The Applicant refers to the response at IP07. Landscape and Visual Impact: The Applicant refers to the response at IP04. Odour: The Applicant refers to the response at IP08. Amenity (inc. noise): The Applicant refers to the response at IP06. Health and sensitive receptors: The Applicant refers to the response at IP06.
NIP07 (REP6-066)	Non-Interested Party	Louise Lesniak	Adequacy of Consultation: The Applicant refers to the response at IP02. Traffic and Transport: The Applicant refers to the response at IP03.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Traffic Surveys: The Applicant refers to the response at IP02. Historic environment: The Applicant refers to the response at IP06. HGV route restrictions: The Applicant refers to the response at IP02.
NIP08 (REP6-067)	Non-Interested Party	Maria Swaep	Historic environment: The Applicant refers to the response at IP06. Traffic Surveys: The Applicant refers to the response at IP02. HGV route restrictions: The Applicant refers to the response at IP02. State of roads/subsidence: The Applicant refers to the response at IP04. Air Quality and health: The Applicant refers to the response at IP06. Amenity (inc. noise and vibration): The Applicant refers to the response at IP06.
NIP09 (REP6-068)	Non-Interested Party	Martin Payne	Funding: Section 3.0 of the Applicant's **Funding Statement (Volume 4.2) [APP-016]** confirms the Proposed Development will be corporately funded; there are no plans for the "local council" to be involved. Regulation: Like all business that are subject to external regulation the Applicant will comply with the necessary standards and emissions limits. Principally secured by the DCO and Environmental Permit the relevant local authority and the Environment Agency will have the powers to inspect, monitor and enforce. Breach of the DCO is a criminal offence. Operator: Regardless of the operator, the standards and emission limits secured by the DCO and Environmental Permit would remain in place.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Amount of APCr generated: The Applicant responded to this matter at RR-176 in the **Applicant's Comments on the Relevant Representations Part 2 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-030]**. In summary, Section 3.5.42 to 3.5.46, **ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030]** describes the quantities and handling arrangements for Air Pollution Control residues (ACPr). This equates to approximately 31,280tpa of APCr assuming a maximum waste throughput of 625,600tpa. Status of IBA and APCr: The Applicant refers to the response at IP09. Transportation of IBA and APCr: The Applicant refers to the response at IP04. Medical/hazardous waste: The Applicant refers to the response at IP06. Air quality and health: The Applicant refers to the response at IP06. Agricultural land – food production: The Applicant refers to the response at IP04. Biodiversity: The Applicant refers to the response at IP09.
NIP10 (REP6-073)	Non-Interested Party	Norman and Barbara Swain	Air quality and health: The Applicant refers to the response at IP06. Climate: The Applicant refers to the response at IP01. Traffic and Transport: The Applicant refers to the response at IP03. Socio-economic and community benefits: The Applicant refers to the response at IP08.
NIP11 (REP6-074)	Non-Interested Party	Oliver Wardill	Air quality and health: The Applicant refers to the response at IP06. Traffic and Transport: The Applicant refers to the response at IP03.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
NIP12 (REP6-075)	Non-Interested Party	Peter Risebrow	Rail connected: The Applicant refers to the response at IP14. Whilst transport of waste by rail does not form part of the Proposed Development, in the event the railway is reopened, the Applicant has identified land within the EfW CHP Facility Site to locate a potential siding. Section 3.4.82 to 3.4.86 of the **ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]** provide further information. Alternatives and site selection: The Applicant refers to the response at IP06. Proximity to sources of waste: The Applicant refers to the response at IP06. Historic environment: The Applicant refers to the response at IP06. Health, Air Quality and sensitive receptors: The Applicant refers to the response at IP04. Agricultural land – food production: The Applicant refers to the response at IP04. Boston Alternative Energy Facility DCO approval: The Applicant refers to the response at IP01.
NIP13 (REP6-076)	Non-Interested Party	Richard Thompson	Historic environment: The Applicant refers to the response at IP06. Traffic and Transport: The Applicant refers to the response at IP03. Landscape and Visual Impact: The Applicant refers to the response at IP04. Air quality and health: The Applicant refers to the response at IP06. Published papers of health impacts and UK HSA position statement: The Applicant refers to the response at IP06. Waste hierarchy (recycling): The Applicant refers to the response at IP03.

Applicant (ExA) ID	Interested Party or Non-Interested Party	Name	Applicant Response
			Medical/hazardous waste: The Applicant refers to the response at IP06. Climate: The Applicant refers to the response at IP01. Health and sensitive receptors: The Applicant refer to the response at IP06. House Prices: The Applicant refer to the response at IP09. Agricultural land – food production: The Applicant refer to the response at IP04. Biodiversity: The Applicant refer to the response at IP09. Electricity generated by the Proposed Development: The Applicant refer to the response at IP11.
NIP14 (REP6-079)	Non-Interested Party	Sally Bass	Air quality and health: The Applicant refers to the response at IP06. Health and sensitive receptors: The Applicant refers to the response at IP06.
NIP15 (REP6-080)	Non-Interested Party	Sir John Hayes MP	General: The Applicant refers to the response at IP03. Traffic and Transport: The Applicant refers to the response at IP03. Air quality and health: The Applicant refers to the response at IP06. Health and sensitive receptors: The Applicant refers to the response at IP06.

Table 2.2: Comments on Deadline 6 submissions from UKWIN – UKWIN's D6 comments on REP5-019/20, REP5-032 & REP5-035 [REP6-042]

ID	Topic/Para	Response	Applicant Comment
UKWIN's D6 Assessment of the Impact of Residual Waste Reduction Targets			
	12 and 13	Considering the comments made at ISH3 and ISH7, in contrast with the Applicant's D5 WFAA, UKWIN's updated analysis looks not only at 2027 and 2042 but also at all the intervening years to show the impact of a linear fall in waste between 2027 and 2042. Based on comments made by the Applicant and others regarding the Applicant's use of a 2-hour drive time, UKWIN's local assessment considers local waste and local EfW (incineration) capacity with consideration given to how much of the Applicant's D5 WFAA Study Area falls within the Applicant's ~2-hour boundary	Noted. However, the Environmental Improvement Plan (EIP) 2023 residual waste reduction target years are 2027 and 2042. To comply with the provisions of the EIP, these are the years that the updated **WFAA [REP5-020]** has reflected. In terms of the Study Area, the rationale for the 2-hour drive time as an indicator for the Study Area is clearly presented in the WFAA (paragraph 3.2.2 onwards) and has been discussed at length both at ISH3 and ISH7 and in various Deadline submissions – most recently Deadline 4, **Applicants comments on Deadline 3 submissions: Part 1 Statutory Parties [Volume 12.3] [REP4-022]** – response in relation to paragraph 2.5 (page 68).
	Paras 14 – 19 Results of UKWIN's assessment of local waste fuel availability	The results of UKWIN's local analysis are as follows:	The Applicant strongly disagrees with the assumptions and conclusions in UKWIN's analysis. The updated **WFAA Rev 3.0 [REP5-020]** robustly demonstrates that the Proposed Development will not result in an over-supply of EfW capacity at either the local/ regional level or national level. Indeed, the Proposed Development will offer up to 625,600 tonnes per annum of much needed capacity that would:

ID	Topic/Para	Response	Applicant Comment

UKWIN Assessment of capacity balance at a local level if 2027 & 2042 residual waste reduction targets are met based on 88% availability of capacity currently operational and under construction (ktpa)

Year	Total residual waste available as fuel	Effective EfW capacity in local area	Waste available for Medworth (sub-total)	Account for local use of Medworth capacity	Waste after Medworth (negative value indicates overcapacity)
2027	1,482	-1,296	186	-500	-314
2028	1,460	-1,296	165	-500	-335
2029	1,438	-1,296	142	-500	-358
2030	1,415	-1,296	119	-500	-381
2031	1,391	-1,296	95	-500	-405
2032	1,367	-1,296	71	-500	-429
2033	1,343	-1,296	47	-500	-453
2034	1,318	-1,296	22	-500	-478
2035	1,292	-1,296	-3	-500	-503
2036	1,267	-1,296	-29	-500	-529
2037	1,241	-1,296	-55	-500	-555
2038	1,215	-1,296	-81	-500	-581
2039	1,189	-1,296	-107	-500	-607
2040	1,162	-1,296	-133	-500	-633
2041	1,136	-1,296	-160	-500	-660
2042	1,109	-1,296	-187	-500	-687

This indicates that the proposed Medworth EfW plant would create and/or exacerbate local EfW overcapacity even if it is assumed that no local waste ends up going to produce Sustainable Aviation Fuel (SAF) or to fuel coincineration plants such as cement kilns.

This is based on only 88% of the permitted capacity of the local EfW plants currently operating or under construction.

If a 31% 'plastic reduction uplift' were applied, to account for anticipated changes in waste capacity associated with changes in waste composition and calorific value, the level of local EfW overcapacity would be far higher.

The Medworth capacity is assumed to be 500ktpa based on an assumption that only 80% of the waste feedstock would come from the local area. The level of overcapacity would be higher if a higher Medworth capacity figure were used.

- Deliver implementation of the waste hierarchy – a cornerstone of England's waste management policy and legislative framework - and divert waste from continued management at the bottom of the waste hierarchy (i.e., landfill) up to having value (in the form of heat and electricity) recovered from it; and
- Facilitate management within England of significant quantities of residual HIC waste exported for management abroad. This would allow waste to be managed in accordance with the proximity principle – a further fundamental pillar of England's waste management policy and legislative framework.

ID	Topic/Para	Response	Applicant Comment

UKWIN Assessment of capacity balance at a local level if 2027 & 2042 residual waste reduction targets are met based on 88% availability of capacity currently operational and under construction with a 31% plastic reduction uplift (ktpa)

Year	Total residual waste available as fuel	Effective EfW capacity in local area	Waste available for Medworth (sub-total)	Account for local use of Medworth capacity	Waste after Medworth (negative value indicates overcapacity)
2027	1,482	-1,697	-215	-500	-715
2028	1,460	-1,697	-237	-500	-737
2029	1,438	-1,697	-260	-500	-760
2030	1,415	-1,697	-283	-500	-783
2031	1,391	-1,697	-306	-500	-806
2032	1,367	-1,697	-330	-500	-830
2033	1,343	-1,697	-355	-500	-855
2034	1,318	-1,697	-380	-500	-880
2035	1,292	-1,697	-405	-500	-905
2036	1,267	-1,697	-430	-500	-930
2037	1,241	-1,697	-456	-500	-956
2038	1,215	-1,697	-482	-500	-982
2039	1,189	-1,697	-509	-500	-1,009
2040	1,162	-1,697	-535	-500	-1,035
2041	1,136	-1,697	-562	-500	-1,062
2042	1,109	-1,697	-589	-500	-1,089

Because none of the incinerators considered would be more than 40-45 years old by 2042 no sensitivity analysis has been carried out for these plants closing during the period considered.

	Paras 20 – 32 Results of UKWIN's assessment of national waste fuel availability	In line with UKWIN's previous submissions, the national assessment of waste fuel availability is based on waste arising within England and residual waste treatment capacity that exists within England.	Noted. The national assessment set out in the updated **WFAA Rev 3.0 [REP5-020]** also focuses on the position in England. The Applicant's position on projects that are in the planning process is set out below. Concerning UKWIN's local analysis, the Applicant strongly disagrees with the assumptions and conclusions made by UKWIN and refers to its response above.

ID	Topic/Para	Response	Applicant Comment

UKWIN Assessment of capacity balance at a national level if 2027 & 2042 residual waste reduction targets are met based on ~88% availability of capacity currently operational and under construction (ktpa)

Year	Total residual waste available as fuel	Effective EfW capacity in England	Cement kiln use of feedstock	Waste-to-SAF use of feedstock	Waste available for Medworth	Medworth capacity	Waste after Medworth (negative values indicates overcapacity)
2027	17,401	-17,900	-1,000	-540	**-2,039**	625	**-2,664**
2028	17,107	-17,900	-1,000	-1,890	**-3,683**	625	**-4,308**
2029	16,809	-17,900	-1,000	-1,890	**-3,981**	625	**-4,606**
2030	16,507	-17,900	-1,000	-1,890	**-4,283**	625	**-4,908**
2031	16,200	-17,900	-1,000	-1,890	**-4,590**	625	**-5,215**
2032	15,890	-17,900	-1,000	-1,890	**-4,900**	625	**-5,525**
2033	15,576	-17,900	-1,000	-1,890	**-5,214**	625	**-5,839**
2034	15,260	-17,900	-1,000	-1,890	**-5,530**	625	**-6,155**
2035	14,941	-17,900	-1,000	-1,890	**-5,849**	625	**-6,474**
2036	14,619	-17,900	-1,000	-1,890	**-6,171**	625	**-6,796**
2037	14,296	-17,900	-1,000	-1,890	**-6,494**	625	**-7,119**
2038	13,972	-17,900	-1,000	-1,890	**-6,818**	625	**-7,443**
2039	13,646	-17,900	-1,000	-1,890	**-7,144**	625	**-7,769**
2040	13,320	-17,900	-1,000	-1,890	**-7,470**	625	**-8,095**
2041	12,992	-17,900	-1,000	-1,890	**-7,798**	625	**-8,423**
2042	12,662	-17,900	-1,000	-1,890	**-8,128**	625	**-8,753**

The 17,900-tonne figure used in the 'Effective EfW capacity in England' column of the table above is taken from the Applicant's D5 WFAA [REP5-020] paragraph 5.1.20.

The data indicates that even if no new incinerators enter construction in England there will be significant EfW overcapacity. While the level of this overcapacity is higher if account is made of Waste-to-SAF capacity (assuming 90% availability of the capacity funded as part of the UK Government's Advanced Fuels Fund) and/or if the use of co-incineration such as cement kilns is considered there would still be EfW overcapacity.

As with the local analysis, sensitivity analysis has also been carried out to show the potential impact of plastic reduction reducing the calorific value of the waste stream and increasing the effective capacity of incinerators that are currently operational and under construction.

ID	Topic/Para	Response	Applicant Comment

UKWIN Assessment of capacity balance at a national level if 2027 & 2042 residual waste reduction targets are met based on ~88% availability of capacity currently operational and under construction with a 31% plastic reduction uplift (ktpa)

Year	Total residual waste available as fuel	Effective EfW capacity in England	Cement kiln use of feedstock	Waste-to-SAF use of feedstock	Waste available for Medworth	Medworth capacity	Waste after Medworth (negative values indicates overcapacity)
2027	17,401	-23,449	-1,000	-540	**-7,588**	-625	**-8,213**
2028	17,107	-23,449	-1,000	-1,890	**-9,232**	-625	**-9,857**
2029	16,809	-23,449	-1,000	-1,890	**-9,530**	-625	**-10,155**
2030	16,507	-23,449	-1,000	-1,890	**-9,832**	-625	**-10,457**
2031	16,200	-23,449	-1,000	-1,890	**-10,139**	-625	**-10,764**
2032	15,890	-23,449	-1,000	-1,890	**-10,449**	-625	**-11,074**
2033	15,576	-23,449	-1,000	-1,890	**-10,763**	-625	**-11,388**
2034	15,260	-23,449	-1,000	-1,890	**-11,079**	-625	**-11,704**
2035	14,941	-23,449	-1,000	-1,890	**-11,398**	-625	**-12,023**
2036	14,619	-23,449	-1,000	-1,890	**-11,720**	-625	**-12,345**
2037	14,296	-23,449	-1,000	-1,890	**-12,043**	-625	**-12,668**
2038	13,972	-23,449	-1,000	-1,890	**-12,367**	-625	**-12,992**
2039	13,646	-23,449	-1,000	-1,890	**-12,693**	-625	**-13,318**
2040	13,320	-23,449	-1,000	-1,890	**-13,019**	-625	**-13,644**
2041	12,992	-23,449	-1,000	-1,890	**-13,347**	-625	**-13,972**
2042	12,662	-23,449	-1,000	-1,890	**-13,677**	-625	**-14,302**

This indicates that changes in waste composition through reduced plastic in the residual waste stream and/or through plastics being removed prior to incineration could increase the effective capacity of existing incinerators and significantly exacerbate the level of EfW overcapacity.

Based on the Applicant's comments in their D5 WFAA we have also modelled the impact of all incinerators closing after 40 years of operation, although we do not believe this to be likely to come to pass.

ID	Topic/Para	Response	Applicant Comment

UKWIN Assessment of capacity balance at a national level if 2027 & 2042 residual waste reduction targets are met based on ~88% availability of capacity currently operational and under construction assuming all incinerators are closed and not replaced after 40 years (ktpa)

Year	Total residual waste available as fuel	Effective EfW capacity in England	Capacity closed after 40 years of operation	Cement kiln use of feedstock	Waste-to-SAF use of feedstock	Waste available for Medworth	Medworth capacity	Waste after Medworth (negative values indicates overcapacity)
2027	17,401	-17,900	0	-1,000	-540	**-2,039**	-625	**-2,664**
2028	17,107	-17,900	0	-1,000	-1,890	**-3,683**	-625	**-4,308**
2029	16,809	-17,900	0	-1,000	-1,890	**-3,981**	-625	**-4,606**
2030	16,507	-17,900	0	-1,000	-1,890	**-4,283**	-625	**-4,908**
2031	16,200	-17,900	0	-1,000	-1,890	**-4,590**	-625	**-5,215**
2032	15,890	-17,900	0	-1,000	-1,890	**-4,900**	-625	**-5,525**
2033	15,576	-17,900	386	-1,000	-1,890	**-4,827**	-625	**-5,452**
2034	15,260	-17,900	386	-1,000	-1,890	**-5,144**	-625	**-5,769**
2035	14,941	-17,900	386	-1,000	-1,890	**-5,463**	-625	**-6,088**
2036	14,619	-17,900	773	-1,000	-1,890	**-5,398**	-625	**-6,023**
2037	14,296	-17,900	1,161	-1,000	-1,890	**-5,333**	-625	**-5,958**
2038	13,972	-17,900	2,115	-1,000	-1,890	**-4,704**	-625	**-5,329**
2039	13,646	-17,900	2,115	-1,000	-1,890	**-5,029**	-625	**-5,654**
2040	13,320	-17,900	2,115	-1,000	-1,890	**-5,356**	-625	**-5,981**
2041	12,992	-17,900	2,301	-1,000	-1,890	**-5,497**	-625	**-6,122**
2042	12,662	-17,900	2,301	-1,000	-1,890	**-5,826**	-625	**-6,451**

This indicates that the closure of all incinerators after 40 years of operation would not start having an impact until around 2033 and would not change the conclusion of UKWIN's analysis.

At ISH7 the Applicant referred to a range of 40-45 years of operation for a typical incinerator. If decommissioning were to commence after 45 years, this would delay the impact by five years, as shown overleaf.

ID	Topic/Para	Response	Applicant Comment

UKWIN Assessment of capacity balance at a national level if 2027 & 2042 residual waste reduction targets are met based on ~88% availability of capacity currently operational and under construction assuming all incinerators are closed and not replaced after 45 years (ktpa)

Year	Total residual waste available as fuel	Effective EfW capacity in England (operational and under construction)	Capacity closed after 40 years of operation	Cement kiln use of feedstock	Waste-to-SAF use of feedstock	Waste available for Medworth	Medworth capacity	Waste after Medworth (negative values indicates overcapacity)
2027	17,401	-17,900	0	-1,000	-540	**-2,039**	-625	**-2,664**
2028	17,107	-17,900	0	-1,000	-1,890	**-3,683**	-625	**-4,308**
2029	16,809	-17,900	0	-1,000	-1,890	**-3,981**	-625	**-4,606**
2030	16,507	-17,900	0	-1,000	-1,890	**-4,283**	-625	**-4,908**
2031	16,200	-17,900	0	-1,000	-1,890	**-4,590**	-625	**-5,215**
2032	15,890	-17,900	0	-1,000	-1,890	**-4,900**	-625	**-5,525**
2033	15,576	-17,900	0	-1,000	-1,890	**-5,214**	-625	**-5,839**
2034	15,260	-17,900	0	-1,000	-1,890	**-5,530**	-625	**-6,155**
2035	14,941	-17,900	0	-1,000	-1,890	**-5,849**	-625	**-6,474**
2036	14,619	-17,900	0	-1,000	-1,890	**-6,171**	-625	**-6,796**
2037	14,296	-17,900	0	-1,000	-1,890	**-6,494**	-625	**-7,119**
2038	13,972	-17,900	386	-1,000	-1,890	**-6,432**	-625	**-7,057**
2039	13,646	-17,900	386	-1,000	-1,890	**-6,757**	-625	**-7,382**
2040	13,320	-17,900	386	-1,000	-1,890	**-7,084**	-625	**-7,709**
2041	12,992	-17,900	773	-1,000	-1,890	**-7,026**	-625	**-7,651**
2042	12,662	-17,900	1,161	-1,000	-1,890	**-6,967**	-625	**-7,592**

If all EfW plants were assumed to close and not be replaced after 45 years of operation, this would delay the start of the impact until 2038, meaning that the impact in 2042 would be less than the previous data table. As before, such closures would not impact on the conclusions.

Even if there are more widespread closures, it is likely that this would be more than outweighed by the introduction of new EfW plants and capacity which already have planning permission.

As set out in the Technical Annex below, there are 30 incinerators with planning permission that are considered to be in development that have yet to enter construction. These plants have a combined permitted capacity of 9,922ktpa.

If 90% of this capacity is utilised, this would amount to an additional 8,930ktpa of capacity.

ID	Topic/Para	Response	Applicant Comment
		Even if only a small proportion of these plants were to come forward it could significantly increase the level of English EfW overcapacity.	
	Paras 33- 47 Consideration of other local and national EfW capacity 'in development'	The analysis reflected in the tables above only considers EfW incineration facilities that are existing or under construction. However, draft EN-3 (March 2023) paragraph 3.7.45 refers to how "Applicants should set out the extent to which the generating station and capacity proposed is compatible with, and supports long-term recycling targets, taking into account existing residual waste treatment capacity and that already in development." (emphasis added) Similarly, in order to "ensure proposals do not result in an over-capacity of EfW waste treatment provision at a local or national level" as expected by paragraph 7.4.5 of EN-3 (March 2023), and by the similar wording at paragraphs 3.7.7 and 3.7.29, logic dictates that one cannot ignore the potential for capacity which is in development but which has yet to enter construction to come forward combining with existing capacity and the proposed new capacity to result in overcapacity. As set out in the Technical Annex (below), UKWIN has identified eight facilities that are 'in development' and located within around a 2-hour drive time of the proposal (two of which are only 1 hour away from the proposed Medworth EfW facility), with planning consent that amount to a combined headline capacity of more than 2.9mtpa with a reasonable prospect of coming forwards to be built (or in one case, to be brought back into use). If the Tilbury Dock EfW facility, which is located around 2 hours and 20 minutes from the Medworth plant, is included then there would be an additional nine EfW facilities with a combined headline capacity of more than 3.2 million tonnes per annum.	Paragraph 5.1.23 and 5.1.24 of the updated **WFAA Rev 3.0 [REP5-020]** provides a full justification around why capacity that is consented and unbuilt, or in the planning system is not considered as comprising residual waste treatment capacity that is *'already in development'*, in the context of paragraph 3.7.45 of the draft EN-3. Importantly, the May 2023 version of the Tolvik report **does not** report on capacity that is either consented and unbuilt or in the planning system. Instead, the Tolvik 2023 report provides a view on the level of capacity that will be available by 2027 (based upon existing and committed projects). In this regard, this WFAA has considered it appropriate and more robust to draw upon the more certain Tolvik 2023 definition of capacity when evaluating compliance with the provisions of the emerging NPS EN-3 i.e. that which is operational or under construction. As part of the WFAA, validation of the Tolvik 2023 capacity data has been sought by drawing a comparison with the WFAA's own up-to-date review of operational EfW capacity and capacity under construction (as provided in Appendix C of the WFAA).

ID	Topic/Para	Response	Applicant Comment
		At a national level, UKWIN has identified 30 incinerators that are considered 'in development' with planning permission but which have not yet entered construction; these have a combined headline capacity of more than 9.9 million tonnes per annum. As noted above, it is possible that these plants might operate below their headline capacity, but it is also possible that changes in waste composition will result in some or all of them operating above their headline capacity. UKWIN's list of EfW facilities considered to be 'in development' is adapted from the list produced by the North Lincolnshire EfW NSIP Applicant, based on their definition, which included EfW projects where planning permission has been secured and which are considered to be still under development, even where the projects had yet to reach financial close ("a final investment decision"). It should be noted that UKWIN's approach to interpreting the phrase 'in development' is more conservative than the approach taken by Tolvik in their May 2022 UK EfW Statistics report. Tolvik describes 'in development' to mean "new additional EfWs" that are included in "Tolvik's database of active development projects", which includes both consented and as yet unconsented EfW projects considered by Tolvik to be in active development.	

ID	Topic/Para	Response	Applicant Comment

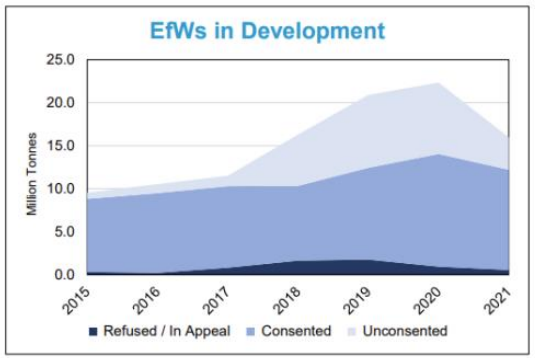


Figure 33: Historic EfW Capacity in Development

Tolvik's data indicated that more than 15 million tonnes of EfW capacity across the UK (which had yet to enter construction) was considered in development at the end of 2021.

If it was assumed that 84% of that UK capacity was located in England, this would amount to more than 13 million tonnes of EfW capacity in development at the end of 2021.

This 13 million tonnes figure for 2021 contrasts with UKWIN's 2023 figure of between 8.9 and 9.9 million tonnes.

When assessing which projects are or are not active there is of course an element of judgement that must be applied. It is possible that some might consider a few of the projects listed by UKWIN as not constituting active projects, but they might also consider some projects omitted by UKWIN to constitute active projects.

If even a small proportion of this capacity in development is built in the future, it would mean that the EfW overcapacity situation would be far worse than modelled by UKWIN.

ID	Topic/Para	Response	Applicant Comment
Comments on the Applicant's D4 WFAA			
	Comments on the Applicant's updated national analysis Para 48	While we welcome the shift in focus from UK to England, UKWIN remains concerned about the inadequacy of the Applicant's nation analysis. A number of UKWIN's concerns regarding this matter are set out by in our oral and written ISH7 representation, with other concerns set out by UKWIN below, and in other UKWIN submissions.	Noted. See Applicant's responses below.
	Comments on the Applicant's updated local analysis Paras 49 - 55	The Applicant appears to include all waste under the 19 12 12 code as being suitable for incineration. As set out in greater detail in the Technical Annex below, only a proportion of this material would be suitable for combustion as this waste stream includes materials specifically excluded from incinerator feedstock, e.g. due to low combustibility or to material being too fine to be compatible with the moving grate typically used by incinerators. According to the UK Government's Call for evidence to support the near elimination of biodegradable waste disposal in landfill from 2028 (dated May 2023) a large proportion of material that is landfilled is actually soil: "In 2020 'waste soils' made up 58% and 'mineral wastes' 6% of the tonnages received at landfills across the UK, making up the largest proportion of material to landfill by some margin when compared to the next largest tonnages. We recognise that large tonnages of soil and soil like material are recorded for disposal in landfill, which for the purposes of waste classification can be labelled as 'active'…" As such, a notable proportion of the 19 12 12 code material, and a large proportion of what is landfilled, is material that would be unsuitable for incineration. This limits the extent to which incineration capacity can be said to be capable of treating waste currently sent to landfill. A large proportion of the remaining material that incinerators might be able to treat is comprised of materials that would be more suitable for reduction, re-use and recycling.	The **WFAA Rev 3.0 [REP5-020]** draws upon a number of sources to establish baseline levels of residual waste. This includes the UK Residual Waste: 2030 Market Review, produced by Tolvik Consulting Ltd on behalf of the Environmental Services Association (November 2017), which concluded that in 2016, there were approximately 27.1 million tonnes of residual waste (+/- 2 million tonnes), of which 12.2 million tonnes were going to landfill. It can be confirmed that this figure for residual waste is based on the following definition of residual waste: *"Household Waste and that from other sources which is similar in nature and composition to Household Waste."* It is also noted that this definition of residual waste excludes a wide range of non-recyclable wastes which are not suitable for treatment alongside Household Waste. These include but are not limited to sludges, various low calorific value wastes, automotive shredder residues, hazardous wastes etc which are either subject to separate treatment and/or landfilled. By way of an update to the 2017 data, the **WFAA Rev 3.0 [REP5-020]** goes on to reference the UK Energy from Waste (EfW) Statistics – 2021', Tolvik Consultancy Ltd

ID	Topic/Para	Response	Applicant Comment
		Even if the Applicant's assessment is correct with respect to the levels of waste within the spatial scope that was historically sent to landfill, this does not mean that such waste would: • still be produced in the future, • not be recyclable/compostable, and • be available for (and suitable for) incineration. 13 It is also important to consider that Waste Local Plans that pre-date the 65% municipal recycling target and/or those that pre-date the target to reduce municipal residual waste by 29% by 2027 and to halve residual waste by 2042 may not fully take into account the latest Government measures and policy expectations. It is therefore crucial to assess whether the proposed 625,600 tonnes of new waste incineration capacity would be needed in the event the Government's 65% municipal recycling target, and the Government's 2027 and 2042 residual waste reduction targets, are met at a local level, and not just at a national level.	(May 2022) as a means of calculating current residual waste levels across England. This report's definition of Residual Waste is as follows: *"Solid, non-hazardous, combustible waste which remains after recycling either treated (in the form of RDF or SRF) or untreated (as "black bag" waste)"* – see page 20 of the 20222 Tolvik report. With these points in mind, the Applicant can confirm that the national assessment has only considered residual waste that would be suitable for treatment at the Proposed Development. Please also refer to the Applicant's response to PND.3.7 in the Applicant's response to ExQ3 (Volume 16.2) in respect of these national targets being applied at a local level.
	Accounting for UK Government residual waste Reduction targets being met at local and national levels Paras 56 - 64	UKWIN set out some concerns in relation the Applicant's D2 WFAA from electronic pages 15 of REP3-050. Many of the issues we identified with respect to the Applicant's failure to account for the UK Government's residual waste reduction targets being met at local and national levels, which are set out on electronic pages 23-31 of REP3-050 have not been adequately resolved by the Applicant's D5 WFAA. Further details regarding a number of concerns about the Applicant's D5 WFAA and the Applicant's failure to adequately assess the impact on waste fuel availability of the achievement of the Government's residual waste reduction targets were set out as part of ISH7 and are detailed within UKWIN's D6 Post-Hearing submission. On internal page 5 of the Applicant's D5 WFAA they state that: "By 2028, even if the Government's ambitious interim residual waste reduction targets	The Applicant strongly disagrees with UKWIN's position. The updated **WFAA Rev 3.0 [REP5-020]** robustly demonstrates that the Proposed Development will not result in an over-supply of EfW capacity at either the local/ regional level or national level. Indeed, the Proposed Development will offer up to 625,600 tonnes per annum of much needed capacity that would: • Deliver implementation of the waste hierarchy – a cornerstone of England's waste management policy and legislative framework - and divert waste from continued management at the bottom of the waste hierarchy (i.e., landfill) up to having value (in the form of electricity recovered from it); and

ID	Topic/Para	Response	Applicant Comment
		set out in their 2023 Environmental Improvement Plan are achieved there is anticipated to be 21.4 million tonnes of residual HIC waste in England requiring management. Based on operational capacity available by 2027, there would remain a minimum shortfall of 3.5 million tonnes of residual HIC capacity in England". For the reasons set out elsewhere by UKWIN, we disagree with the 21.4Mtpa estimate because it includes non-combustible and non-suitable waste, and we note that the operational capacity figure does not include non-MWI capacity, both of which undermine the Applicant's 3.5Mtpa figure. UKWIN's analysis set out above shows that there would be EfW overcapacity if the residual waste reduction targets are met. The Applicant's D5 WFAA statement (internal page 5) that "…the Proposed Development will not result in an over-supply of EfW capacity at…the local/regional level…" fails to note that the Applicant has not carried out a local analysis of EfW capacity which takes into account the residual waste reduction targets being met at a local level (as noted by UKWIN at ISH7). UKWIN's analysis set out above shows that there would be local EfW overcapacity if the Government's residual waste reductions targets were met at a local level. UKWIN's ISH7 submissions set out how the Applicant's D5 WFAA footnote 13 figure of 3.2Mtpa for facilities that could close is misleading. While we do not believe it appropriate to assume that all incinerators would close after 40-45 years of operation, we have modelled this and shown that it does not impact on the conclusions that there would be EfW overcapacity at a local and national level.	• Facilitate management within England of significant quantities of residual HIC waste exported for management abroad. This would allow waste to be managed in accordance with the proximity principle – a further fundamental pillar of England's waste management policy and legislative framework. Importantly, the updated **WFAA Rev 3.0 [REP5-020]** explicitly considers the extent to which there will be a need for the Proposed Development if current, aspirational Government residual waste reduction targets are met as set out in the Government's May 2023 Environmental Improvement Plan (EIP). This concludes that by 2028, even if the Government's ambitious interim residual waste reduction targets set out in their 2023 Environmental Improvement Plan are achieved, there would remain a minimum shortfall of 3.5 million tonnes of residual HIC capacity in England. Furthermore, in respect of the contention that the 21.4 million tonnes per annum estimate includes non-suitable waste, the Applicant has addressed this point in detail in the above response to Comments on the Applicant's updated local analysis Paras 49 – 55 of the IP's submission. Please also refer to the Applicant's response to PND.3.7 in the Applicant's response to ExQ3 (**Volume 16.2**) in respect of these national targets being applied at a local level.

ID	Topic/Para	Response	Applicant Comment
	Waste-to-SAF capacity Para 65	UKWIN maintains our position that the Applicant's failure to properly account for Waste-to-SAF capacity continues to undermine their Waste Fuel Availability Assessments.	Full consideration is given to the potential capacity offered by sustainable aviation fuel (SAF) technology in paragraphs 5.2.27 to 5.2.31 of the updated **WFAA Rev 3.0 [REP5-020].** Importantly, this concludes that there is significant uncertainty over the ability of emerging technology such as that proposed to generate SAF to provide adequate capacity to accommodate future residual waste. Furthermore, the use of residual waste to create SAF would not result in the management of that waste being driven further up the waste management hierarchy than use of the waste at the Proposed Development – the recovery of heat and electricity (as would be the case for the Proposed Development) is, in waste planning policy terms, equivalent to the development of SAF.
	Impact of changes in composition on waste processing capacity Para 66	As set out in this and in other representations submitted to the Examination by UKWIN and others, the Applicant's approach fails to adequately account for changes in waste feedstock composition.	See response to UK32 in the **Applicant's comments on the Deadline 4 Submissions: Part 2 Other Interested Parties Volume 14.4b [REP5-035].**
	Waste hierarchy protections Para 67	UKWIN maintains our position that the Waste Hierarchy protections identified by the Applicant would be incapable of preventing the harm to recycling and the management of waste at the top tiers of the Waste Hierarchy that would be caused by local and/or national EfW overcapacity.	See response to UK27 in the **Applicant's comments on the Deadline 4 Submissions: Part 2 Other Interested Parties Volume 14.4b [REP5-035].**
	Overarching NPS EN-1 and NPS EN-3 Paras 68 - 81	At Paragraph 2.2.15 of the Applicant's D5 WFAA they claim that: "Draft EN1 reiterates the presumption in favour of granting consent in paragraph 4.1.3, and further states that all applications for development consent for energy infrastructure should be assessed on the basis that the government has demonstrated that there is an urgent need for those types of infrastructure, that "substantial weight" should be given to this need when considering applications for development consent, and that the specific contribution of	The Applicant disagrees with UKWIN's interpretation of the national policy statements. The **WFAA Rev 3.0 [REP5-020]** alongside the **Planning Statement (Volume 7.1) [APP-091]** considers all relevant national and local planning policy and demonstrates that the Proposed Development complies fully with all relevant policy.

ID	Topic/Para	Response	Applicant Comment
		any individual project to satisfying the need is not required to be separately considered (paragraphs 3.2.5 to 3.2.7)". 15 This misrepresents Government policy on EfW, which makes clear that the 'waste need' for proposed NSIP EfW incinerator developments must be demonstrated, and that preserving the Waste Hierarchy takes precedence over energy generation. EN-1 (2011) paragraph 3.4.3, which is repeated at paragraph 3.3.38 of Draft EN-1 (March 2023), states: "…Only waste that cannot be re-used or recycled with less environmental impact and would otherwise go to landfill should be used for energy recovery…" As such, current Government policy is that the benefit of energy generation does not justify allowing capacity that could undermine the Waste Hierarchy. As Draft EN-3 (March 2023) puts it at paragraphs 3.7.6 and 3.7.7: "As the primary function of EfW plants is to treat waste, applicants must demonstrate that proposed EfW plants are in line with Defra's policy position on the role of energy from waste in treating waste from municipal or commercial and industrial sources. The proposed plant must not compete with greater waste prevention, re-use, or recycling, or result in over-capacity of EfW waste treatment at a national or local level". As such, while energy generation is a benefit of the proposal, the primary purpose of the plant is waste management so it is necessary to justify that the proposal would demonstrably be contributing to, rather than undermining, the Waste Hierarchy. Policies on the 'need to demonstrate waste need' in existing and emerging Government policy have been previously set out by UKWIN and do not need repeating, but this helps to explain why Draft EN-3 places such an emphasis on preventing local and national EfW overcapacity on the basis that EfW is different from other forms of energy generation due to its unique	Importantly, the **WFAA Rev 3.0 [REP5-020]** conclusively demonstrates that the Proposed Development would facilitate in moving a substantial portion of the ~2.4 million tonnes of suitable residual waste that is presently landfilled in the Study Area, further up the waste hierarchy. Furthermore, as has been explained at length previously – and most recently in the Applicant's comments on the **Deadline 5 Submissions: Part 2 Other Interested Parties Volume 14.4b [REP5-035]** in response to UK02; UK05; UK06; UK11; UK27 and UK28 - the Proposed Development will not prejudice the achievement of waste reduction, reuse and recycling initiatives which the Applicant fully supports. The Applicant's response to paragraphs 56-64 above, and the Applicant's response to PND.3.7 in the **Applicant's response to ExA's Written Questions ExQ3 (Volume 16.2),** also explains how the Applicant's assessment fully considers the achievement of the Government's new national targets which seek the reduction of residual waste generation. See response to UK27 in the **Applicant's comments on the Deadline 4 Submissions: Part 2 Other Interested Parties Volume 14.4b [REP5-035]**.

ID	Topic/Para	Response	Applicant Comment
		potential to undermine recycling and residual waste reduction efforts and to undermine the management of waste at the top tiers of the Waste Hierarchy. It is clear that the Government's proposed residual waste reduction targets are specifically intended to reduce EfW waste incineration. As such UKWIN's analysis – that as residual waste arisings are reduced in line with meeting the target the current level of incineration capacity will be more than enough because residual waste will reduce in line with the targets – is wholly in line with Government statements on the topic. In this regard, we draw attention to the statement made on behalf of the Government by the Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs (Rebecca Pow) on 25th May 2023 that: "We [the Government] want to see less waste being sent to incinerators, which is why we set a statutory target to halve the 2019 level of residual waste by 2042..." 16 The Statement from Defra's Under-Secretary of State went on to refer to incineration plants as "energy from waste plants", making clear that EfW, such as that proposed for Medworth, are within the scope of her statement. The Government's explanation that sending less waste to incinerators is a reason for their introduction of the target to halve residual waste supports UKWIN's interpretation of how to assess the impact of meeting that target on the Medworth Applicant's need case and the weight to be given to current and proposed (emerging) Government policies. Such policies include measures to protect the top tiers of the Waste Hierarchy, prevent EfW overcapacity, fulfil the duties under the Environment Act 2021 in relation to environmental targets, and to have regard to policies set out in the Government's Environmental Improvement Plan (EIP).	

ID	Topic/Para	Response	Applicant Comment
		As such it would be wrong to assume that the Government's existing or proposed policy is intended to prioritise energy generation at the expense of the Waste Hierarchy. Instead, it is clearly the Government's intention that the NSIP system will prioritise protecting the top tiers of the Waste Hierarchy over energy generation and following the precedent set by cases such as Wheelabrator Kemsley North, refuse proposals where the evidence indicates that a grant of permission would give rise to EfW overcapacity.	
	RDF and biomass Paras 82 - 89	At Paragraph 5.1.23 of their D5 WFAA the Applicant states: "It is unclear from the data available the extent to which consented capacity relates specifically to the waste streams being targeted by the Proposed Development – for example, a large number of projects are designed to manage RDF or biomass". If the Applicant is not targeting RDF as potential feedstock for their Medworth incinerator then it is curious why they include EWC code 19 12 10 ('combustible waste (refuse derived fuel')) on page 2 of their WFAA as part of the material that forms "the main focus of the WFAA". It is also curious why the Applicant, e.g. at REP5-020 paragraph 4.1.22, includes in their WFAA waste exported as RDF as part of the potential feedstock that would be available for treatment at their Medworth EfW. Even if the Medworth plant would not treat any RDF, because RDF is generated from mixed waste then more domestic RDF plants coming online would mean less waste feedstock will be available for incineration at Medworth and other non-RDF EfW incineration plants. 17 The Applicant also excludes biomass capacity, but it should be noted that some of the residual waste that they include in their waste fuel availability assessments (e.g. feedstock within the national definition of residual waste excluding non-major mineral waste, used by the Applicant to assess	As stated previously, the fundamental focus of the updated **WFAA Rev 3.0 [REP5-020]** – and its previous iterations, is on the extent to which the Proposed Development can divert suitable waste that is currently landfilled. Whilst consideration is given in the **WFAA Rev 3.0 [REP5-020]** to the amount of RDF that is presently exported from the Study Area to Europe for onward processing, as these quantities are relatively small (~160,000 tonnes per annum), the focus of the need case is on the almost 2.4 million tonnes of suitable residual waste that is presently landfilled in the Study Area. In this regard, the conclusion of the WFAA is that the Proposed Development would provide much need capacity that would deliver implementation of the waste hierarchy – a cornerstone of England's waste management policy and legislative framework - and divert waste from continued management at the bottom of the waste hierarchy (i.e., landfill) up to having value (in the form of electricity recovered from it). Please also refer to the Applicant's response to PND.3.1 to PND.3.4 in the Applicant's response to ExQ3 (**Volume 16.2**) for a detailed consideration of RDF.

ID	Topic/Para	Response	Applicant Comment
		compliance with England meeting the UK Government's residual waste reduction targets) includes waste wood that could be treated at biomass plants. According to Table 14C.1 of the Applicant's Climate Appendices [APP-088] the Applicant's Core Case lists wood as comprising 2.3% of the Medworth EfW's feedstock, i.e. more than 14,000 tonnes per annum. This figure rises to 3.3% (more than 20,000 tonnes per annum) in the Applicant's 'Reduced food and plastic' case. Even if their Medworth EfW plant does not receive any waste wood, then – as with RDF – non-EfW waste wood treatment capacity would reduce the amount of waste available in the market overall which in turn would reduce the quantity of material that would be available to feed the Medworth EfW plant. Further commentary on UKWIN's concerns regarding Paragraph 5.1.23 are set out in our comments on the Applicant's response to PND 2.7 ('HIC availability if planned development is built in East Midlands') below.	
	Capacity 'in development' Paras 90 - 92	At paragraph 5.1.24 of the Applicant's D5 WFAA they state: "Importantly, it is noted that the May 2023 version of the Tolvik report does not report on capacity that is either consented and unbuilt or in the planning system. Instead, the Tolvik 2023 report provides a view on the level of capacity that will be available by 2027 (based upon existing and committed projects). In this regard, this WFAA has considered it appropriate and more robust to draw upon the more certain Tolvik 2023 definition of capacity when evaluating compliance with the provisions of the emerging NPS EN-3 i.e. that which is operational or under construction". Such an approach is wholly out of step with the Government's emerging requirement to consider all EfW capacity that is 'in development'.	See response to paragraphs 33-47 above.

ID	Topic/Para	Response	Applicant Comment
		As set out above, Tolvik's May 2022 report on 2021 EfW statistics included capacity 'in development' which went well beyond capacity which is currently operational or under construction, as did the definition of 'in development' adopted by the North Lincolnshire EfW NSIP Examination.	
	Assessment of Local Plans Lincolnshire Paras 93 - 100	Reasonable concerns were raised at ISH7 by the Examining Authority with respect to the Applicant's continued failure to contact waste collection and waste disposal authorities (local councils) to confirm that the Applicant's assessment of their respective local plans and capacity situation are accurate, up-to-date, and a proper representation of their current position. The Applicant's response, that such effort is unnecessary because the information they cite is in the public domain, fails to grapple with the potential for the Applicant to inaccurately portray one or more of the local authorities' current position. One example where the Applicant's assessment appears to miss out crucial information is in their assessment of Lincolnshire County Council on internal pages 62-63 of the D5 WFAA. The Applicant refers to the "Review of the Lincolnshire Minerals and Waste Local Plan (February 2021)" which stated that "For energy recovery, the plan notes that additional capacity is still required to address a growing capacity gap going forward". However, the Applicant does not then go on to consider the subsequent report dated 24th June 2021 entitled 'Lincolnshire Waste Needs Assessment 2021 – Overview Report – Final Issue'. This more recent document is part of the Lincolnshire Minerals and Waste Local Plan Evidence Base, and Table 20 of that document finds that Lincolnshire is now forecast to have a surplus of energy recovery capacity:	The Applicant's approach to assessing the availability of fuel for the Proposed Development is established in Section 3 of the **WFAA Rev 3.0 [REP5-020].** To ensure proportionality and transparency, reliance has been placed on evaluating publicly available data and policy documents. This also seeks to ensure compliance with the provisions of key national policy such as NPs EN-3 (paragraph 2.5.66) which requires that applicants prepare *"an assessment… that examines the conformity of the scheme with the waste hierarchy and the effect of the scheme on the relevant waste plan or plans where a proposal is likely to involve more than one local authority".* In terms of Lincolnshire, the **WFAA Rev 3.0 [REP5-020]** has considered the position in the emerging draft plan, which was approved by the Council for consultation. The status of the subsequent consultant's report on local waste needs has not been included in the WFAA as the status of this report in the context of the emerging waste Local Plan is unknown with the Plan itself in an early stage and yet to be consulted upon (the Local Development Scheme suggests that consultation on the Preferred Approach will be Spring 2023 although consultation has yet to take place). Please also refer to the Applicant's response to PND.3.1 to PND.3.4 in the **Applicant's response to ExAs Written Questions ExQ3 (Volume 16.2)** for a detailed

ID	Topic/Para	Response	Applicant Comment
		Table 20: Lincolnshire Residual (Non-Inert) Waste Management Energy Recovery Capacity Requirement at Forecast Milestone years (tonnes) **2025 / 2030 / 2035 / 2040 / 2045** **Total** from Table 11: 201,485 / 171,824 / 147,730 / 138,528 / 140,763 Capacity (Table 13): 321,000 / 321,000 / 321,000 / 321,000 / 321,000 **Surplus/ Shortfall**: **+119,500 / +149,000 / +173,000 / +182,500 / +180,000** Table 20 of the Lincolnshire County Council document from June 2021 estimates a surplus of Energy Recovery (EfW) Capacity that increases from an overcapacity of 119,500 tpa in 2025 to an overcapacity of 182,500 by 2040, reducing to 180,000 tonnes of EfW overcapacity in 2045. The assessment caried out by Lincolnshire County Council predates the grant of planning permission for the 1.2 million tonnes of additional capacity approved for Boston, which is located within Lincolnshire.	discussion of the impacts of the approval of the Boston Alternative Energy Facility on the conclusions of the Applicant's WFAA.
UKWIN Comments on Applicant's Response to ExQ2			
	PND.2.3 – Total and in-scope East Midlands Capacity Paras 101 - 105	The Applicant's list of 'total' and 'in scope' East Midlands capacities appears to have significant omissions. It also lists Newhurst as under construction, however this facility entered full operation in June 2023. 102. The data can be summarised as follows:	Noted. Regardless of its status as now being fully operational, the capacity offered by Newhurst EfW in Lincolnshire is fully taken account of in the **WFAA Rev 3.0 [REP5-020].** In terms of UKWIN's understanding of EfW capacity, this is also noted. However, the Applicant is confident that the data presented in the updated **WFAA Rev 3.0 [REP5-020]** remains valid and up to date. Indeed, the data presented in Appendix C of the **WFAA Rev 3.0 [REP5-020]** simply acts as a sensitivity analysis / checker of the capacity data presented by Tolvik in their 2023 report. Paragraphs 5.1.28 to 5.1.29 and Table 5.2 of the **WFAA Rev 3.0 [REP5-020]** demonstrate that the data set out in

ID	Topic/Para	Response	Applicant Comment

Applicant and UKWIN East Midlands EfW Incineration Capacities

Type of capacity	Total East Midlands from WFAA Appendix C	Corrected Total Midlands Capacity	'In Scope' East Midlands Capacity in REP5-032	Corrected 'In-Scope' East Midlands Capacity
Operational	446	882	246	682
Under Construction	520	170	350	0
Consented and not yet entered construction	1,099	2,536	154	1,614
In planning	1,000	230	1,000	0

One reason for the differences in the figure for waste operational or under construction relates to the Applicant's omission of the Boston Aviva capacity (86ktpa) which was historically limited to biomass but has now been converted into treating RDF.

A list of EfW incineration plants used in UKWIN's calculations above are set out overleaf.

Appendix C of the WFAA is comparable to that assumed in the Tolvik 2023 report.

For these reasons and given that the Tolvik 2023 report is based upon a 'live' database of capacity which has the benefit of in-depth, commercial analysis, specific to the HIC residual waste treatment capacity, the Applicant's assessment of national need has been based on the operational capacity assumptions of the Tolvik 2023 report.

Please also refer to the Applicant's response to PND.3.1 in the **Applicant's response to ExA's Written Questions ExQ3 (Volume 16.2)** in respect of the reasons RDF-only facilities are not direct competitors to the Proposed Development.

ID	Topic/Para	Response	Applicant Comment

List of EfW plants from UKWIN's East Midlands Capacity Corrections

Status	EfW Plant	County	'In-Scope'?	Headline capacity (ktpa)
Consented and not yet entered construction	Boston BAEF	Lincolnshire	Yes	1,200
Consented and not yet entered construction	EMERGE	Nottinghamshire	No	525
Operational	Newhurst	Leicestershire	Yes	350
Consented and not yet entered construction	Corby (Shelton Road)	Northamptonshire	Yes	260
In Planning	Swadlincote	Derbyshire	No	230
Operational	Eastcroft (Lines 1 & 2)	Nottingham	No	200
Operational	North Hykeham	Lincolnshire	Yes	190
Under Construction	Drakelow ACT	Derbyshire	No	170
Consented and not yet entered construction	Bulwell	Nottingham	No	160
Consented and not yet entered construction	Corby (Gretton Brook Road)	Northamptonshire	Yes	154
Consented and not yet entered construction	Eastcroft (Lines 3)	Nottingham	No	140
Consented and not yet entered construction	Bilsthorpe	Nottinghamshire	No	97
Operational	Boston (Aviva)	Lincolnshire	Yes	86
Operational	Newlincs	Lincolnshire	Yes	56

Capacity shown is Tolvik's reported permitted capacity where available, and otherwise is based on publicly stated headline capacities for the plant

	PND.2.7 – HIC availability if planning development is built in East Midlands	In their response to PND.2.7 the Medworth Applicant makes similar arguments as those in section 5.1.23 their D5 WFAA. We dispute what they say in both sections.	See response to PND2.3 and paragraphs 101 to 105 above. Please refer to the Applicant's responses to PND.3.1 to PND.3.4 in the **Applicant's response ExAs Written**

ID	Topic/Para	Response	Applicant Comment
	Paras 106 - 137	The 1.2 million tonnes of capacity associated with the Boston Alternative Energy Facility (BAEF) is no longer "at the same stage in the consenting process as the Proposed [Medworth] Development" as development consent for the BAEF was granted on the 6th of July 2023. The Medworth Applicant makes a number of incorrect assertions in their attempted justification of Excluding the Boston capacity from their WFAA. The Medworth Applicant states: "The Boston facility, however, is in the East of England region". 110. As confirmed in the UK Government's Renewable Energy Planning Database, the BAEF facility is located within the East Midlands region rather than in the East of England region. The Medworth Applicant states: "The facility would utilise Advanced Thermal Conversion technology…" This comment is years out of date. While the original BAEF proposal was for an Advanced Thermal Conversion gasification technology from Outotec, the Applicant withdrew and subsequently re-submitted their scheme as one for conventional EfW incineration and it was this varied scheme for the use of conventional EfW incineration technology that was approved. The Medworth Applicant states: "the Boston facility requires RDF fuel to arrive at the facility via boat at a purpose-built dock; no waste or RDF may be transported to the facility by road". Whilst the BAEF plant is intended to treat primarily waste transported to the wharf, the DCO does not preclude delivery by road. DCO Requirement 17 (on DCO pages 48 and 49) allows transport by road to be authorised subject to it not causing unacceptable traffic impacts. The Statement of Common Ground between the BAEF developer and Boston Borough Council envisages the potential delivery of waste fuel via a private road between the nearby Slippery Gowt Waste Transfer Station	**Questions to ExQ3 (Volume 16.2)** for a full discussion of the Boston Alternative Energy Facility, RDF, and the potential for Great Yarmouth Port to export RDF. In terms of the port of Hull, this sits wholly outside the Study Area for the localised analysis in the **WFAA Rev 3.0 [REP5-020].**

ID	Topic/Para	Response	Applicant Comment
		(operated by Lincolnshire County Council) which currently transfers waste to the 190ktpa EfW incinerator at North Hykeham. It appears to be the Borough Council's position that diverting this local waste to the new Boston EfW plant would not increase HGV movements as waste was already travelling via HGV to the Waste Transfer Station. 22 If this waste were diverted to the BAEF plant then this would of course free up capacity at the North Hykeham incinerator which is also within the Applicant's WFAA Study Area. Furthermore, one of the ports identified as a source of waste for the BAEF is Great Yarmouth which is in Norfolk and is therefore within the Medworth Applicant's study area set out in Graphic 3 of their D5 WFAA. The BAEF Applicant anticipates taking waste from a 2-hour drive time from that port, which means there is significant overlap between the potential feedstock area for the BAEF and the EfW proposed for Medworth. While the BAEF operator might end up taking waste from a variety of ports, there is no planning restrictions that would prevent a significant quantity of the waste coming via the Great Yarmouth port and this could include waste coming from Norfolk, Suffolk, Essex, and indeed Cambridgeshire. An extract from Figure 1 'Proposed Port Locations and Indicative Waste Catchment Area Travel Time' from the BAEF Applicant's 'Addendum to Fuel Availability and Waste Hierarchy Assessment' is reproduced overleaf, with the proposed Medworth facility added to show both the close proximity between the Boston site and the Medworth site, and to show how the Boston site and much of its Great Yarmouth catchment area falls within the Medworth Applicant's WFAA Study Area. The graphic also shows that Hull is another of the proposed BAEF supply ports and how BAEF's 2-hour drive time around Hull includes the northern portion of the Medworth Applicant's WFAA Study Area.	

ID	Topic/Para	Response	Applicant Comment

Boston facility and nearby supply ports, with coloured areas showing regions included in Medworth study area from WFAA D5 Graphic 2 with proposed Medworth plant shown with a star symbol

BAEF proposed catchment extract, with colours showing the BAEF's 2-hour drive time in green and 1-hour drive time in purple, with proposed Medworth plant shown with a star symbol

The Medworth Applicant claims: "The RDF fuel base this [BAEF] project is looking to capture is UK-based material currently being exported to Europe".

ID	Topic/Para	Response	Applicant Comment
		The BAEF Applicant's stated objectives for the Boston plant includes the objective to "reduce the quantity of waste exported abroad" but it also includes the objective to "reduce the quantity of waste disposed to landfill". This means that they were not intending to solely target waste that is exported abroad. The BAEF Applicant modelled the GHG impacts of the facility based on the facility diverting between 0% and 50% from RDF Export with the remaining 100%-50% being diverted from domestic landfill. Indeed, the Waste Fuel Availability Assessment Addendum for the BAEF stated that the intended primary source of waste was waste currently being landfilled in the UK, not waste currently being exported, stating: "Primary sources of fuel will comprise wastes that are currently being landfilled that will be diverted and processed into RDF…" This means that the BAEF Applicant intends to take waste which was historically being landfilled and was not previously being converted into RDF, putting that emerging facility into direct competition for feedstock with the proposed Medworth plant. Waste which was historically exported as RDF is considered by the BAEF Applicant as an additional source of RDF rather than as their primary source of feedstock. However, even if the BAEF plant were to limit feedstock only to material previously exported as RDF, the 1.2 million tonnes of capacity would still impact on the local and national levels of waste fuel available for treatment at the proposed Medworth EfW plant. The Medworth Applicant states: "Only ~160,000 tonnes of RDF is identified as coming from the Study Area".	

ID	Topic/Para	Response	Applicant Comment
		The 160ktpa figure is explained at paragraph 4.1.20 of the Medworth Applicant's D5 WFAA, which shows that it is based on a Medworth Applicant adjusted figure for historic RDF exported from Suffolk alone. This flawed approach ignores the fact that, whilst the port of Great Yarmouth is located in Norfolk, the BAEF applicant anticipates taking waste from up to a 2-hour drive from supply ports, and they do not limit themselves to waste currently being exported as RDF. The Medworth Applicant's D5 WFAA also fails to account for the proximity of Medworth to the port of Hull. 25 As set above, much of the Medworth Applicant's WFAA Study Area would be covered by the BAEF 2-hour catchments for Great Yarmouth and Hull. When assessing the impact of RDF within the context of waste fuel availability, it should be noted that it takes more than one tonne of raw waste to produce one tonne of RDF.	
	CE.2.2 – Worst case composition for climate change Paras 138 - 141	In the first paragraph of their reply to ExQ2 CE.2.2 on electronic 21 of REP5-032 the Applicant's assessment of worst case scenario relates to the worst case for landfill, not the worst case for their proposed incinerator. UKWIN's D5 submissions included an assessment of the impact of changes in waste fuel composition that could result in worse GHG emissions than modelled by the Applicant in their reply to CE.2.2. We note that the Applicant does not show how their "maximum adverse composition" would impact on the results, but we expect it would result in a significant net adverse GHG impact. We await the Applicant's Deadline 6 further submissions which we hope will take into account the various relevant considerations that UKWIN noted	The waste fuel composition presented in the first paragraph of the Applicant's response to ExQ2 CE.2.2 (**Vol.14.2 Applicant's response to the ExA's Written Questions (ExQ2) [REP5-032]**) is a relevant scenario to present for the proposed EfW CHP Facility as it is considered to be a maximum adverse case in terms of operating the EfW CHP Facility. This is not intended to represent a worst case scenario for landfill. Following the request from Cambridgeshire County Council (CCC) at Issue Specific Hearing 4 (ISH 4) on 17 May 2023 (**ISH 4, action point No.7 [EV-059]**), additional sensitivity analysis has been provided, which includes assessment for further alternative waste composition scenarios. The Applicant engaged with CCC

ID	Topic/Para	Response	Applicant Comment
		in our D5 submission such as the importance of modelling the impact of the crediting biogenic carbon sequestration in their landfill baseline.	to confirm relevant alternative scenarios to be included in the additional sensitivity analysis, and to review the findings of the assessment with CCC before it was submitted. The additional sensitivity analysis was submitted as a Technical Note at Deadline 6 (**Vol.15.7 Applicant's Response to ISH4 Action Point 7 Technical Note: Climate Additional Sensitivity Assessment [REP6-030]**). With regard to landfill and carbon sequestration, please see the Applicant's response to UKWIN paras 151 - 159 below.
	CE.2.3 – Availability of waste of stated composition in study area Paras 142 - 145	As noted above, much of what has historically gone to landfill is either suitable for reduction, re-use or recycling or ended up in landfill because it was not suitable for incineration. The Applicant talks about how much HIC is available but not compare the composition of that HIC against their assumed feedstock composition used for their climate assessment. It is possible that no HIC waste available within their study area matches the composition that they assume because composition is not based on waste in the study area. For example, the Applicant's approach to the inclusion of food waste in their 'current case' scenario does not take into account the comments made by the Applicant at ISH7 that there is already a high degree of food waste collection in the WFAA Study Area, meaning the feedstock assumed by the Applicant in its 'current case' analysis does not reflect their knowledge of the current level of food waste composition in the area.	As noted in **ES Chapter 14 Climate Change (Volume 6.2) [APP-041]**, a detailed breakdown of residual waste composition for relevant Waste Planning Authorities in the WFAA Study Area is limited. Therefore, given the lack of detailed information available for the composition of HIC waste, and as stated in the ES, information on residual waste composition available from WRAP's national survey of municipal waste for England in 2017[1] is considered to be the most appropriate basis for determining the composition of residual waste that would be available for the EfW CHP Facility. Further to this, the Applicant has considered alternative waste composition scenarios in the additional sensitivity analysis submitted at Deadline 6 (**Vol.15.7 Applicant's Response to ISH4 Action Point 7 Technical Note: Climate Additional Sensitivity Assessment [REP6-030]**). This includes a scenario based on information provided by Cambridgeshire County Council (CCC) for its

[1] WRAP 2020, National Municipal Waste Composition, England 2017, Table 3

ID	Topic/Para	Response	Applicant Comment
			current residual waste composition, along with separate scenarios for reducing in food and plastic material in residual waste.
	CO.2.5 – Waste Hierarchy Requriement 14 Paras 146 - 150	The Applicant cites Riverside Requirement 16 as precedent for Waste Hierarchy Requirement 14. However, changes in circumstances since the Riverside DCO was approved in April 2020 that could reduce the level of confidence that could be placed in the efficacy of such a requirement for a mixed waste feedstock and therefore the weight it should be given in the planning balance include: • the increase in incineration capacity (operational and under construction) since April 2020, and the expansion of existing capacity; • the publication of Defra's first Resources and Waste Strategy Monitoring Progress report, which found that a significant proportion of the residual waste stream comprised material that could have been recycled or composted (August 2020); • the publication of the Waste Management Plan for England (January 2021); • the dischargement of Condition 16 of the Riverside Energy Park Order 2020 (as amended) through adoption of a relatively ineffectual Waste Hierarchy Scheme (April 2022); • the proposed changes to EN-1 and EN-3 (September 2021 and March 2023); • Government statements about the importance of avoiding EfW overcapacity (e.g. as made in July 2022); • the publication of the UK Government's Jet Zero Strategy and announcement of funding for Waste-to-SAF capacity (July 2022 and December 2022); • the publication of the Environmental Improvement Plan (EIP), including the interim waste reduction targets for 2027 (January 2023);	The Applicant has continued working with CCC to ensure that they are satisfied that Requirement 14 is appropriately drafted so as to ensure that the waste hierarchy is maintained and that the Proposed Development will not compete with or prevent waste management further up the waste hierarchy. The Applicant has used the Riverside Energy Park Order 2020 to guide its drafting of Requirement 14 on the basis that this approach has been accepted as being appropriate by the Secretary of State. Requirement 18 of the Boston Alternative Energy Facility Order 2023 confirms that the Secretary of State continues, as at July 2023, to consider such a waste hierarchy scheme requirement to be appropriate. The Applicant therefore disagrees with UKWIN's position and considers such a requirement to still be effective. This matter was also addressed by the Applicant in response to UK70, **Applicant's comments on the Deadline 3 Submissions: Part 2 Other Interested Parties (Volume 12.3b) [REP4-023].** In terms of the IP's assertion that the Proposed Development would harm recycling, this would not be the case and is an issue that has been addressed by the Applicant numerous times – most recently in the **Applicant's Response to the Deadline 4**

ID	Topic/Para	Response	Applicant Comment
		• the adoption of a legally binding target to halve residual waste by 2042 as part of the Environmental Targets (Residual Waste) (England) Regulations (January 2023); and • new evidence about the increased use of residual waste for cement kilns (May 2023). Further details on a number of these differences are set out in previous UKWIN submissions, including a detailed study of why the Riverside Waste Hierarchy Scheme ended up being so much less effective than the original Condition might have implied would be the case. Similar concerns remain regarding how much a Medworth scheme could resolve in practice, especially in line of the comments made by the Applicant's expert at ISH6 which disclaimed responsibility for recyclable material being incinerated at other plants operated by the Applicant. Furthermore, as previously noted by UKWIN, even if the Applicant could prevent any potentially recyclable material from being incinerated, this would not prevent the plant from harming recycling if it resulted in local or national EfW overcapacity as other plants could end up receiving more recyclable material to be incinerated.	**Submissions: Part 2 Other Interested Parties [REP5-035]** – most notably UK05.
Applicant's Comments on UKWIN's D4 Submissions			
	UKWIN question Extracts from paras 151 - 159	The Applicant has misstated UKWIN's clearly expressed question, which is not about whether or not the Applicant stands by their methodology, but about whether or not the Applicant disputes the numerical calculations and associated impact of following the methodology proposed by UKWIN. .. we thought it would be in the interest of the Examination to give the Applicant an opportunity to point out any numerical errors in UKWIN's calculations and/or our characterisation of the impact of adopting such a methodology with respect to the resulting assessment.	The Applicant considers that the potential sequestration of non-fossil carbon when evaluating the GHG emissions associated with landfill is not consistent with accepted methodology and established guidelines. The Applicant considers that consistent with standard methodologies (see below) the approach adopted in **ES Chapter 14 Climate Change (Volume 6.2) [APP-041]** is the appropriate approach (i.e. excluding emissions associated with non-fossil carbon sequestered by landfill).

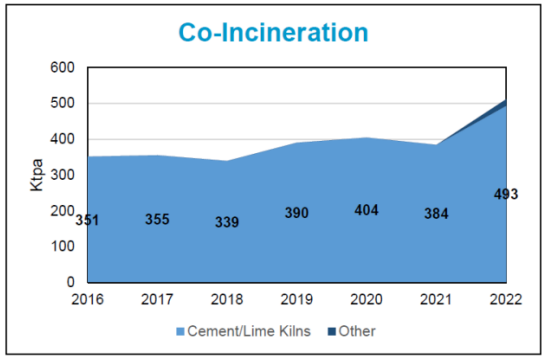
ID	Topic/Para	Response	Applicant Comment
		… if one follows the methodology set out in REP2-064, and kept all other assumptions as per the Applicant's climate assessment [APP-041], this will result in reducing the GHG benefit of the facility by 171,846 tonnes of CO2 per annum, which would be sufficient to tip the balance of the Medworth proposal to 'adverse', Whilst the Applicant's REP5-035 response confirms that their adopted approach does not give credit for biogenic carbon sequestration, they fail to directly answer UKWIN's question which related to whether or not they dispute the implications of following the aforementioned methodology (proposed by both Equanimator and UKWIN, based on the approach set out by Defra) to provide such credit. Given that UKWIN's question was worded clearly in REP4-042, we take the Applicant's response – which does not directly dispute the impacts of applying the aforementioned methodology to giving credit for biogenic carbon sequestration – as confirmation that the Applicant does not dispute that if one applied that methodology as described in REP2-064 then one would obtain the results set out in REP2-064 (as summarised in REP4-042) in line with one of the two approaches to giving such credit set out in Defra's Carbon Based Modelling Approach report.	In response to further representations from UKWIN with respect to carbon sequestration by landfill the Applicant has confirmed that as well as being consistent with Defra's model for evaluating sensitivity factors related to CO_2 emissions from EfW and landfill[2], the approach used by the Applicant in the ES is also consistent with IPCC guidelines[3] and the latest UK Greenhouse Gas Inventory Waste Sector[4] reporting of emissions for solid waste disposal sites (SWDS), where the proportion of biogenic carbon that does not decompose in landfill is excluded from emissions reporting (see Applicant's response UK24 in **Vol.15.6b Applicant's comments on the Deadline 5 Submissions: Part 2 Other Interested Parties [REP6-029]**).
Technical Annex			
	Approach to assessing – 2-hour local capacity	UKWIN's approach to assessing the local balance scopes out all EfW capacity in Essex, i.e. the 595,000 tpa Rivenhall facility, and limits inclusion of the 350,000 tpa Newhurst facility to only 154,000 tonnes (which is only	The Applicant, in its WFAA [**REP5-020]** has consistently based its assessment of localised need upon a robustly defined Study Area. The assessment concludes that

[2] Defra (2014). Energy recovery for residual waste. A carbon based modelling approach.
[3] IPCC (2006). IPCC Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories. Chapter 5 Waste.
[4] Department for Energy Security and Net Zero (DESNZ, 2023). UK Greenhouse Gas Inventory, 1990 to 2021. Annual Report for Submission under the Framework Convention on Climate Change.

ID	Topic/Para	Response	Applicant Comment
	Extracts from paras 160- 176	44% of Newhurst's headline permitted capacity) because that EfW facility is located in Leicestershire. Overall the approach adopted by UKWIN results in a rather generous definition of a 2-hour drive time, as the slight loss of land in the south of the Applicant's D5 WFAA Study Area that falls within the purple 2-hour boundary (in the northern extremes of Essex and Hertfordshire) is more than offset by the inclusion of larger areas of land to the north and east (including the whole of Lincolnshire, Norfolk, and Suffolk) where significant proportions of these counties fall outside the purple 2-hour boundary This approach is far more reasonable in terms of representing local waste than the Applicant's method of including 100% of all areas within, and in some cases beyond, the East of England region even where only a tiny portion of those areas falls within the 2-hour boundary (including Luton which is entirely outside and beyond the purple 2-hour boundary, which appears to have been included just to 'complete the set' of councils within the East of England region). 176. 102k of potential capacity from Ratty's Lane in Hoddesdon has been included because it was reported by ENDS on the 6th of July 2023 that: "…the plant was being mothballed early last year, however a new business has now taken over the facility, which could be started up again"	there would be more than sufficient fuel available to the Proposed Development from within this Study Area, thereby ensuring that a portion of the 2.4 million tonnes of suitable residual waste that is currently landfilled in the Study Area is not only managed in a proximate manner but also in accordance with the waste hierarchy. Furthermore, the Applicant has reviewed the IPs representation and in summary disagrees with the approach, assertions and conclusions that are made and considers the **WFAA [REP5-020]** to be a significantly more robust and transparent assessment.
	Incineration capacity currently existing and under construction Paras 177 - 178	For national capacity, UKWIN uses the Applicant's interpretation of the figure from Tolvik's 2022 EfW Statistics published in May 2023. This is based on the Tolvik estimate of future operational capacity based on 88% of the permitted capacity of the EfW plants currently operating or under construction taken from the 17.9mtpa figure in the Applicant's D5 WFAA [REP5-020] paragraph 5.1.20. The local plants are calculated using 88% of the headline permitted capacity listed by Tolvik for those plants in the 2022 EfW Statistics. Only half of the Newhurst capacity was included and none of the Rivenhall capacity.	The Applicant, in its **WFAA [REP5-020]** has consistently based its assessment of national need upon a robustly and transparently defined methodology. Due to the fluid nature of waste contracts and movements around the country, the 2-hour drive time has been used as an indicator (and not a limiter) to inform which WPAs should be included within the Study Area for the WFAA. The assessment concludes that by 2028, even if the Government's ambitious interim residual waste reduction targets set out in their 2023 Environmental Improvement

ID	Topic/Para	Response	Applicant Comment
			Plan are achieved there is anticipated to be 21.4 million tonnes of residual HIC waste in England requiring management. Based on operational capacity available by 2027, there would remain a minimum shortfall of 3.5 million tonnes of residual HIC capacity in England – a shortfall that the Proposed Development would make a valuable contribution to meeting. Furthermore, the Applicant has reviewed the IPs representation and in summary disagrees with the approach, assertions and conclusions that are made and consider the **WFAA [REP5-020]** to be a significantly more robust and transparent assessment.
	Facilities considered/excluded by UKWIN in local analysis	**Facilities considered/excluded by UKWIN in local analysis** **EfW Plant** / **Area (approx.)** / **Tolvik Permit / Headline Capacity (ktpa)** / **% of effective capacity included** / **Status** SUEZ Suffolk - EfW Facility / Great Blakenham / Suffolk / 295 / 100% / Operational Rookery South ERF (Central Bedfordshire) / Central Bedfordshire / 585 / 100% / Operational Peterborough EfW Facility / Peterborough / 85 / 100% / Operational Lincolnshire EfW Facility / North Hykeham / Lincolnshire / 190 / 100% / Operational Boston Energy Production Facility / Lincolnshire / 86 / 100% / Operational NewLincs ERF / Lincolnshire / 56 / 100% / Operational Newhurst ERF / Leicestershire / 350 / 50% / Operational Rivenhall / Essex / 595 / 0% / In Construction	The Applicant, in its **WFAA [REP5-020]** has consistently based its assessment of local need upon a robustly and transparently defined methodology. The assessment concludes that there would be more than sufficient fuel available to the Proposed Development from within this Study Area, thereby ensuring that a portion of the 2.4 million tonnes of suitable residual waste that is currently landfilled in the Study Area is not only managed in a proximate manner but also in accordance with the waste hierarchy. Furthermore, the Applicant has reviewed the IPs representation and in summary disagrees with the approach, assertions and conclusions that are made and consider the **WFAA [REP5-020]** to be a significantly more robust and transparent assessment.
	Waste-to-SAF Capacity	UKWIN sets out its approach to quantifying the impact of Waste-to-SAF capacity in UKWIN's Written Representation [REP2-066] paragraphs and	Full consideration is given to the potential capacity offered by sustainable aviation fuel (SAF) technology in paragraphs 5.2.27 to 5.2.31 of the updated **WFAA**

ID	Topic/Para	Response	Applicant Comment
	Paras 179 and 180	UKWIN's Comments on the Applicant's D2 WFAA [REP3-050] paragraphs 126-146. In UKWIN's D6 submission we apply a more 'conservative' approach by only including 90% of the anticipated feedstock requirements of those facilities	**[REP5-020].** Importantly, this concludes that there is a significant question mark over the ability of emerging technology such as that proposed to generate SAF to provide adequate capacity to accommodate future residual waste. Furthermore, the use of residual waste to create SAF would not result in the management of that waste being driven further up the waste management hierarchy than use of the waste at the Proposed Development – the recovery of heat and electricity (as would be the case for the Proposed Development) is, in waste planning policy terms, equivalent to the development of SAF. Furthermore, the Applicant has reviewed the IPs representation and in summary disagrees with the approach, assertions and conclusions that are made and consider the **WFAA [REP5-020]** to be a significantly more robust and transparent assessment. The Applicant's responses to IP comments made with regard to the WFAA (REP3-050] can be found in Table 2.1 **Applicant's comments on the Deadline 3 Submissions: Part 2 Other Interested Parties (Volume 12.3b) [REP4-023].**
	Co-incineration capacity Paras 181 - 189	Tolvik's May 2023 report on 2022 EfW Statistics shows the upwards trend of residual waste (in the form of SRF) being accepted at UK cement and lime kilns, alongside the variation of existing biomass permits to allow them to burn RDF, which rose by 109ktpa (from 284ktpa to 493ktpa) in 2022 compared to 2021.	Full consideration is given to the potential capacity offered by co-incineration in paragraphs 5.2.32 to 5.2.35 of the updated **WFAA Rev 3.0 [REP5-020].** Importantly, this concludes that it is not considered that emerging technologies such as capacity offered by co-incineration of residual waste at cement kilns represent a credible or better alternative to the Proposed Development. In any case, even if the 0.5 million tonnes worth of national capacity (and the ~45,000 tonnes of capacity offered by

ID	Topic/Para	Response	Applicant Comment
		Graphic from Tolvik's May 2023 report on 2022 EfW Statistics Residual Waste Co-Incinerated in the UK  If cement kiln use continued to increase at this rate of just over 100ktpa per annum until 2027 then the amount of residual waste co-incinerated would double to around 1 million tonnes per annum. It would be reasonable to expect that this upwards trend of the use of residual waste at cement and lime kilns will continue as these sectors seek to decarbonise by moving away from the conventional use of fossil fuels. To illustrate this intention, we note that in November 2022 waste production and supply specialist N+P published an article on their website entitled 'Why alternative fuel use in the cement industry is working so well'. The article included the following passage: "Harnessing waste instead of using fossil fuels always promised monetary savings for kilns, but that is particularly so in the current geopolitical and economic environments where energy prices are at record highs. Purchasing domestically sourced alternative fuels allows kilns to avoid wholesale fossil fuel prices, eliminate currency fluctuations, and dodge geopolitical disruption. The current economic reality means that some kilns may not be viable if they continue	the only cement works in the Study Area) was included in this assessment, the amount of waste that could be handled via co-incineration is so limited that existing and predicted shortfalls in HIC residual waste management capacity remain well in excess of the capacity offered by the Proposed Development. Furthermore, the Applicant has reviewed the IPs representation and in summary disagrees with the approach, assertions and conclusions that are made and consider the **WFAA [REP5-020]** to be a significantly more robust and transparent assessment.

ID	Topic/Para	Response	Applicant Comment
		to rely on fossil fuels. Fortunately, many of the beliefs preventing cement kilns from accessing the financial benefits of alternative fuels have been dispelled. In the past, it was often assumed that alternative fuels could only be used in newer 38 kilns, would require major modifications to production processes, and would lead to process instability. In fact, alternative fuels can be adopted even by older kilns with many examples in operation today." As the production of 1 tonne of SRF requires more than 1 tonne of 'raw' waste (e.g. due to dewatering as waste dries), the figure of 493ktpa of SRF being co-incinerated in 2022, and the 1Mtpa figure reflecting a continuation of this trend to 2027, understate the impact of such increases on the level of waste available for conventional incineration. As such, the assumption that demand for residual waste for use in powering cement kilns could double from around 500ktpa in 2022 to around 1,000ktpa by 2027 is considered conservative, especially as it is assumed to remain stable rather than to continue increasing. UKWIN has carried out modelling of anticipated waste arisings and residual waste treatment capacity, including cement kilns, below. This shows that even without increases in cement kiln capacity there will be incineration overcapacity, and if it is assumed that trends in cement kiln usage of RDF/SRF will increase to 1Mt by 2027 then the level of overcapacity would be worse.	
	Per capita basis for waste as fuel forecasts Paras 190 -207	As previously set out by UKWIN, there are three interim residual waste reduction targets for 2027 set out in the Environmental Improvement Plan 2023: • Interim Target 1: "By 31 January 2028, the total mass of residual waste excluding major mineral wastes in the most recent full calendar year does not exceed 437 kg per capita."	The updated **WFAA Rev 3.0 [REP5-020]** explicitly considers the extent to which there will be a need for the Proposed Development if current, aspirational Government residual waste reduction targets are met as set out in the Government's May 2023 Environmental Improvement Plan (EIP). This concludes that by 2028, even if the Government's ambitious interim residual waste reduction targets set out in their 2023

ID	Topic/Para	Response	Applicant Comment
		• Interim Target 2: "By 31 January 2028, the total mass of residual waste excluding major mineral waste in the most recent full calendar year does not exceed 25.5 million tonnes." • Interim Target 3: "By 31 January 2028, the total mass of municipal residual waste in a year does not exceed 333 kg per capita." Interim Targets 1 and 2 are based on all residual waste excluding major mineral waste, which would presumably include material that would not be suitable for incineration, such as non-major mineral waste. The Interim Target 3 figure for municipal residual waste goes beyond just household waste. As the EIP 2023 puts it: "Interim target 3 covers the narrower scope of municipal waste. This is waste from households plus waste similar in composition to household waste, such as commercial waste. We propose this target because it captures where current policy interventions, the Collection and Packaging Reforms, are focused. It also provides a reference point for the material-based interim targets, which currently can only be satisfactorily measured at a municipal level. Achieving this target will reduce the total mass of municipal residual waste by 29% compared to 2019 levels". Estimates for municipal waste are a better fit for the feedstock that incinerators are expected to treat. Even if a quantity of non-municipal waste is treated at incinerators, this could be expected to be exceeded by the quantity of municipal waste that would be treated at biomass plants or that would be unavailable for incineration due to being non-combustible or too small to be compatible with the moving grates used by incinerators. According to Tolvik municipal waste primarily includes waste falling within European Waste Catalogue (EWC) codes 19 12 10, 19 12 12 and 20 03 01.	Environmental Improvement Plan are achieved, there would remain a minimum shortfall of 3.5 million tonnes of residual HIC capacity in England. Regarding the IP's assertion that the Applicant has failed taken account that not all residual waste at the national level would be suitable for management at the Proposed Development – see the response above relating to paragraphs 56-64 of the IP's submission. Furthermore, the Applicant has reviewed the IPs representation and in summary disagrees with the approach, assertions and conclusions that are made and consider the **WFAA [REP5-020]** to be a significantly more robust and transparent assessment.

ID	Topic/Para	Response	Applicant Comment
		Tolvik's November 2017 report, which the Applicant used for forecasting future municipal waste, states on internal page 15 that: "DEFRA reported that in 2015 15.3Mt of (Residual) Municipal Waste was landfilled. However, this potentially over-estimates the tonnage of Municipal Waste to landfill. Separate analysis of publicly available data suggests that (with the probable exception of Scotland), the DEFRA figure includes all waste to landfill coded under the European Waste Catalogue as 19 12 12. In fact, a review of waste treatment facilities in England producing 19 12 12 reveals that this code is being used for a range of different outputs, some of which are almost certainly inert and fall within the lower landfill tax band (and so not suitable for treatment alongside Household Waste). Analysis of all sites in England would suggest that at least 65% of 19 12 12 was derived from active waste inputs. Further analysis is contained in Appendix 1. Across the UK as a whole in 2016 it is estimated that around 8.8Mt of 19 12 12 was produced and sent to landfill, of which it is therefore estimated circa 2.8Mt was inert-derived. This would suggest that the total tonnage of Residual Waste sent to landfill in 2016 was 15.3Mt less 2.8Mt, i.e. 12.2Mt. If instead it is assumed that c.80% of 19 12 12 was active waste, then the total tonnage of Residual Waste to landfill in 2016 is estimated to have been 13.6Mt. On balance this review assumes a figure of 12.2Mt." On internal page 33 the Tolvik UK Residual Waste Capacity Gap report from 2017 states: "*Section 3.2 notes the uncertainty surrounding the tonnage of Residual Waste being sent to landfill. This is likely to be in part due to the misclassification (whether deliberate or otherwise) of Residual Waste at the "lower tax" rate and in part due to the misclassification of wastes under the EWC codes.*	

ID	Topic/Para	Response	Applicant Comment
		In 2016, EWC code 19 12 12 was used for in excess of 9 Mt of landfilled waste in the UK. A site by site review reveals patterns which suggest some waste producers are using 19 12 12 to describe all Residual Waste. This appears to be on the basis that the waste has previously undergone treatment (and so cannot be coded as 20 03 01), but that it is not a "Refuse Derived Fuel" (and so cannot be coded as 19 12 10). Others use 19 12 12 to describe fines – whether or not inert. These differences will have a direct impact on the future assessment of landfill inputs." The potential unsuitability of some 19 12 12 waste for incineration is noted on paragraph 3.4.5 on page 25 of the Scottish Incineration Review carried out by Dr. Colin Church for the Scottish Government which states that: "…*some waste classified as sorting residues (EWC 19 12 12) may be unsuitable for incineration with the dominant moving grate technology".* Footnote 23 of the Scottish Incineration Review report noted that even for waste that might be potentially combustible it would not always be suitable for combustion, stating that: "…sorting residue particles are often too fine to be put through a moving grate incinerator". As such, a large quantity of 19 12 12, which is generally categorised as part of the municipal waste stream, is material that is deemed unsuitable for incineration either due to its low calorific value or to it being so fine as to not being compatible with use at a moving grate incineration. Or, to put it another way, in some processes the material deemed suitable for incineration ended up being coded as 19 12 10 (or as waste wood), and the remaining waste which is deemed unsuitable for combustion at EfW plants is coded as 19 12 12. It therefore makes sense that 19 12 12 includes a high proportion of material that ends up in landfill due it not being considered suitable for combustion.	

ID	Topic/Para	Response	Applicant Comment
		Given the potential non-suitability of incineration for some of the municipal stream, it is considered that using 90% of the municipal waste target, as UKWIN has done, is more likely to underestimate than overestimate the amount of residual waste available for incineration. This is especially true due to the potential for some of the waste not to be available for other reasons not otherwise considered. UKWIN therefore adopts 90% of the municipal residual waste reduction target as the starting point and assumes that by 2042 the feedstock will be 90% of half of the 2019 level of municipal waste assuming it falls in line with the other waste streams. A linear fall between the 2027 and 2042 targets is applied to represent the need for waste to halve by 2042 relative to the 2019 base year. Further details on the basis for this approach is set out in UKWIN's Written Representation [REP2-066].	
	Calculation of future arisings based on per capita figures Paras 208 - 209	For arisings UKWIN uses the most recent ONS forecasts available, which are the 2018-based SNPP forecasts for the local assessment and the 2020-based interim forecast for the England-wide assessment. The population forecasts are then multiplied by the per-capita figures.	Noted. Paragraph 5.2.26 of the updated **WFAA Rev 3.0 [REP5-020],** sets out the basis of the Office for National Statistics population predictions that have been used to calculate future waste arisings.

ID	Topic/Para	Response	Applicant Comment

National waste as fuel arisings figures

Year	Thousand people in England (ONS)	Kg total municipal residual waste per person (based on EIP Targets)	Kt total municipal residual waste (Population multiplied by waste per person)	Kt waste as fuel (90% of total)
2027	58,061	333	19,334	**17,401**
2028	58,230	326	19,008	**17,107**
2029	58,389	320	19,060	**16,809**
2030	58,541	313	18,341	**16,507**
2031	58,684	307	18,000	**16,200**
2032	58,819	300	17,656	**15,890**
2033	58,948	294	17,307	**15,576**
2034	59,071	287	16,955	**15,260**
2035	59,189	280	16,601	**14,941**
2036	59,304	274	16,243	**14,619**
2037	59,419	267	15,885	**14,296**
2038	59,533	261	15,524	**13,972**
2039	59,648	254	15,162	**13,646**
2040	59,764	248	14,799	**13,320**
2041	59,880	241	14,435	**12,992**
2042	58,061	235	14,069	**12,662**

Note: Displayed values are rounded to the nearest whole number

ID	Topic/Para	Response	Applicant Comment

Local ~2-hour waste as fuel waste arisings figures

Year	Thousand people in England (ONS)	Kg total municipal residual waste per person (based on EIP Targets)	Kt total municipal residual waste (Population multiplied by waste per person)	Kt waste as fuel (90% of total)
2027	4,946	333	1,647	**1,482**
2028	4,970	326	1,623	**1,460**
2029	4,994	320	1,630	**1,438**
2030	5,017	313	1,572	**1,415**
2031	5,039	307	1,546	**1,391**
2032	5,061	300	1,519	**1,367**
2033	5,081	294	1,492	**1,343**
2034	5,101	287	1,464	**1,318**
2035	5,120	280	1,436	**1,292**
2036	5,140	274	1,408	**1,267**
2037	5,159	267	1,379	**1,241**
2038	5,178	261	1,350	**1,215**
2039	5,196	254	1,321	**1,189**
2040	5,215	248	1,292	**1,162**
2041	5,235	241	1,262	**1,136**
2042	5,254	235	1,232	**1,109**

Note: Displayed values are rounded to the nearest whole number

Table 2.3: Comments on Deadline 6 submissions from UKWIN – D6 Post Hearing Submission including Summary of UKWIN's ISH7 Oral Submissions (ISH7 Agenda Item 3) [REP6-043]

ID	Topic/Para	Response	Applicant Comment
Local Level Assessment			
	Paras 4 - 6	The Applicant relies entirely on their D5 WFAA to support their claim that they have demonstrated compliance with the requirements of the emerging revised EN-3 with respect to the prohibition on EfW over-capacity at a local level. UKWIN's expressed view is that there are at least two matters that mean that the Applicant has not even left the starting gate when it comes to being in a position to make such a claim.	The Applicant disagrees with the IPs assertions, approach and conclusions and refer to the response at IP06 and the **Applicant's Written Summary of Oral Submissions at ISH7 [REP6-025]** under item 3 "Waste Issues".
	Paras 7 - 9	Firstly, the Applicant's supposedly 'local' assessment goes well beyond the purple 2-hour drive time boundary, which the Applicant describes as a reasonable commercial limit. While UKWIN is aware of waste travelling greater distances, especially when waste transfer stations are involved, assessing the national waste picture is for the national assessment to consider, and does not constitute a local assessment for the purpose of considering compliance or otherwise with either the extant EN-3 requirements or with the strengthened requirements reflected in the Government's emerging replacement EN-3. Whilst emerging EN-3 (2023) does not define the term 'local', it is clear that 'local' must equate to	The Applicant disagrees with the IPs assertions, approach and conclusions and refer to the reponse at IP06.

ID	Topic/Para	Response	Applicant Comment
		an area no greater than a sub-regional level, otherwise the Government would have used the term 'regional'. The Applicant's WFAA relies on a supra-regional approach to evaluating the local level, taking account not only of the whole of the East of England region but also parts of the East Midlands region, in some cases going well beyond the Applicant's purple 2-hour drive time boundary. Such an approach cannot be considered to reflect the situation at a local level.	
	Para 10	Secondly, the Applicant does not include meeting the residual waste reduction targets at a local level as part of their assessment, as they only attempt to assess meeting the 2027 and 2042 targets at a national level.	The Applicant disagrees with the IPs assertions, approach and conclusions and refer to the reponse at IP06.
Combustibility of national feedstock			
	Paras 11 - 17	UKWIN noted how the Applicant limits itself to certain waste types for its local analysis, in recognition of the fact that some residual Household, Industrial, and Commercial (HIC) "will not be suitable for use as a fuel source at the Proposed Development e.g., rubble and soils" and to "avoid an over-estimation of available fuel". In the D5 WFAA [REP5-020, at paragraph 3.2.25] the Applicant states that: "HIC waste covers a wide cross section of waste types (as illustrated in the list above), this WFAA has taken into account the fact that parts of this stream will not be suitable for use as a fuel source at the	The Applicant disagrees with the IPs assertions, approach and conclusions and refer to the reponse at IP06.

ID	Topic/Para	Response	Applicant Comment
		Proposed Development e.g., rubble and soils. In recognition of this, and to avoid an over-estimation of available fuel, this assessment has excluded those waste types that are not suitable for combustion at the Proposed Development". And at paragraph 5.2.23 of the D5 WFAA, as part of figure of 21.4, the Applicant talks about "total mass of residual waste" and provides a figure for this, which they repeat in paragraph 5.2.39, where the Applicant refers to "total residual HIC requiring management" in 2027/28, and then similarly when the Applicant talks about waste arisings in 2042/43 at paragraph 5.2.26 the number that they use is, according to them, based on total residual waste, not just the combustible element. It appears however that the Applicant failed to apply this logic to their national analysis with respect to the impact of meeting the residual waste reduction targets. When asked about this as part of ISH7, Claire Brown for the Applicant was unable to respond in detail, stating that the Applicant would "like to go away and check that" and that whilst they thought that the EIP figure excluded non-combustible waste such as "mineral waste and rubble" they would "welcome the opportunity to go back to double check that and come back with a robust answer". UKWIN's position regarding the element of national waste with respect to the Government's	

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		targets that should be considered as available for use as a waste fuel is set out in our D6 response to the Applicant's D5 WFAA. This evidence makes clear why the Applicant is wrong to use the entire residual waste figure from the EIP, without taking account of the fact that some of this will, in the words of the Applicant, "not be suitable for use as a fuel source".	
Anticipated EfW facility closures			
	40 year assumption for EfW closures and 3.2 million tonne closure figure Paras 18-23 and 25 -26	As part of ISH7 UKWIN pointed out how North London's Edmonton incinerator has been operating for more than 50 years, whereas in relation to the Applicant's stated view regarding EfW "capacity [that] is likely to have been lost by 2042", the D5 WFAA's Footnote 13, on electronic page 96, claims that: "As set out in Appendix C, the 10 oldest facilities will all be over 40 years old by 2042 and account for 3.2 million tonnes of existing capacity". UKWIN asked what efforts the Applicant has made to verify their assumptions in this regard. For example, the Applicant was asked if they had contacted Veolia to clarify whether or not Veolia intends to shut down their South East London CHP (SELCHP) facility when they are currently investing heavily in connecting that facility to a district heating scheme, and whether or not the Applicant has approached FCC to discuss FCC's plans to close or maintain their Eastcroft EfW	The Applicant disagrees with the IPs assertions, approach and conclusions and refer to the reponse at IP06.

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		facility in Nottingham which is relied upon for an extensive CHP network. Paul Carey for the Applicant responded that "the life [of an incinerator] is typically 40 to 45 years" and that as a general rule they "don't ask" operators "specifically about the plants for closing down facilities" but that "even if they did have such discussion" they would not disclose commercially confidential information "so it's not really something we can engage in on debate in this matter". UKWIN went on to ask specifically about whether removing the 10 oldest plants would actually reduce capacity by 3.2 million tonnes as claimed in the D5 WFAA because, setting aside the question of whether these EfW facilities would in fact close, the 3.2 million tonne figure is problematic. This elicited a response from the Applicant regarding thier 3.2m figure and further clarification of their 40-year claim. UKWIN noted: • Firstly, that the Applicant is netting off against Tolvik's available capacity figures, yet they are doing so by using the full permitted capacity rather than 88% of that capacity; and • Secondly, that the Applicant's approach subtracts around half a million tonnes of capacity from the Edmonton plant which is being replaced, while Tolvik already did their own netting off process for this by using a blank cell for the new Edmonton capacity, and so for the Applicant to remove Edmonton a second time	

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		would be a form of double counting (or 'double discounting'). UKWIN asked the Applicant if they agreed that the actual impact of removing these plants, based on excluding Edmonton's capacity from a second removal and using Tolvik's 88% availability rate to calculate the impact of removing the remaining 9 EfW plants in 2042 would only reduce Tolvik's forecast capacity total for England by 2.39 million tonnes. Claire Brown then made a couple of overarching statements, explaining that the Applicant "certainly haven't assumed that any plants over 40 years old would automatically close. We're simply illustrating the point that we are talking about so far in the future here. I mean, 20 years ago from today, the capacity position was very different to how it is now. 20 years ahead is likely to be the same…" UKWIN's D6 comments on the Applicant's D5 WFAA sets out how future EfW facility closures, if they do occur by 2042, will still not be sufficient to result in a capacity shortfall that justifies the proposed plant, and that in any case such closures are likely to be more than offset by new capacity coming forward and/or by reductions in plastic reducing the calorific value of the residual waste, which will result in more waste being able to be processed at existing EfW plants.	
Intervening years			

ID	Topic/Para	Response	Applicant Comment
	Paras 27 -31	In the Applicant's written summary of their Oral Submissions at ISH3 [REP4- 019] it is stated that: "The Applicant confirmed that it will set out its approach to the 2035 and 2042 targets, and the intervening years, in more detail in the updated WFAA to be provided at Deadline 5". (emphasis added) The importance of assessing the intervening years was highlighted in UKWIN's post-hearing submission including the Summary of UKWIN's ISH3 Oral Submissions [REP4-038] where we explained how: • "26. While the Applicant stated at ISH3 that if there is a need in 2042 then there is no value considering intervening years, such a notion is incompatible with the Applicant's approach of assuming that a number of plants will be decommissioned in 2042 because there would be years prior to 2042 when those plants would be operational"; and • "27. UKWIN does not endorse the Applicant's approach of assuming in their assessment that existing plants with permanent planning permission will be decommissioned, but the Applicant's adoption of such an approach makes it clear that it is essential that they provide 5 assessments of the intervening years, alongside evidence of operators' intentions to decommission currently operational EfW facilities". At ISH7 UKWIN noted that, looking at the D5 WFAA [REP5-020], we were unable to find the	The Applicant disagrees with the IPs assertions, approach and conclusions and refer to the reponse at IP06.

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		Applicant's promised inclusion of the intervening years covering the period after 2027 and before 2042, to show the situation where waste arisings will be expected to have fallen well below the 2027 levels on the trajectory towards achieving the 2042 target but prior the level of EfW facility closures upon which the Applicant appears to rely upon for their claim that there would be enough waste in 2042 to serve as incinerator feedstock. In response, the Applicant said that "the inclusion of the 2028 figure is the intervening year". Unlike the Applicant's assessment, UKWIN's updated balance between waste arisings and capacity set out in our D6 response to the Applicant's D5 WFAA includes the intervening years, allowing for more detailed consideration of how the closure of EfW plants after 40-45 years of operation would not be sufficient to prevent the Medworth plant from creating or exacerbating EfW overcapacity at a local or national level.	
Reduced hours			
	Paras 32 - 53	Mike Turner for the Applicant stated at ISH7: "With regard to the question 'is this an all or nothing facility', the answer is that we do have the ability to lower the number of hours that it runs, and we also have the ability to operate at a partial load and reduce the amount the facility takes – throughput – over a given period of time".	The Applicant refers to the **Technical Note: Reduction in Energy Inputs, Appendix A, Written Summary of the Applicant's Oral Submissions at ISH7 (Volume 15.3) [REP6-025]**

ID	Topic/Para	Response	Applicant Comment
		UKWIN responded to this statement, noting that we had never seen the number of operational hours at EfW facilities in the UK reduced due to a lack of feedstock. Instead, UKWIN what we have seen from, for example Sheffield CHP, was how instead of reducing their operational hours operators – in this instance Veolia – increased their feedstock catchment area on the basis that the CHP scheme would suffer if they were to operate with reduced waste. UKWIN has seen numerous other waste catchment planning conditions being loosened or removed altogether when waste was not available. Veolia's successful 2012 variation application submitted to Sheffield City Council (12/03137/FUL) for the Sheffield CHP incinerator stated that due to the lack of local waste and the planning conditions that were then in place: "…it is predicted that there will be insufficient waste available in the future to meet the ERF's [Energy Recovery Facility's] operational requirements. Any shortfall in feedstock potentially results in a reduction in the efficiency 6 of the plant and its energy outputs as well as potential increases in shutdown time and the associated use of fossil fuels to maintain combustion temperature control and support the District Energy Network during such periods".1	

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		In answering questions from Sheffield City Council as part of the application, Veolia's Planning Manager provided the response that: "In order to operate approaching its maximum efficiency the ERF must be supplied with close to maximum consented input to the facility. If the ERF operates at a lower waste throughput then less heat and power will be generated. As a consequence this will negatively impact upon the carbon footprint as the plant will need to augment the waste input with greater volumes of gas and oil (standby boilers) to compensate for the loss of heat. Therefore in order to achieve the most sustainable solution, it is essential the inputs to the plant are secured and maximised with any projected shortfall adressed well in advance". The situation faced by Veolia in Sheffield is not unique, as evidenced by several other applications to vary or remove catchment area restrictions, including Veolia's October 2014 application to Brighton & Hove City Council for a "Variation of planning condition 38 of Planning Permission LW/462/CM (EIA), in order to remove the catchment boundary restriction for waste importation to the energy recovery facility" associated with their Newhaven Energy Recovery Facility, North Quay, Newhaven. Similar applications have been made by other EfW operators, including for example with respect to the Rivenhall incinerator in Essex. In April 2015 Gent Fairhead applied to Essex County Council asking for the removal of the	

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		restriction that had limited the feedstock catchment area and associated requirements to source around 87,500 tonnes of SRF from within the boundaries of Essex and Southend-on-Sea, and to source no more than 50% of paper and card throughput for the site from outside the east of England region. According to waste trade press coverage, including the Letsrecycle article entitled "Rivenhall plant allowed to source waste outside of Essex" (a copy of which accompanies this submission), "The firm also successfully cited a number of similar waste facilities that have applied to remove geographical restrictions on appeal. Earlier this year, Drenl applied to expand its current catchment area for its proposed 120,000 tonnes-per-year gasification plant in Corby". 1 Paragraph 5.8 of Veolia's supporting statement for Application to Vary Condition 3 of Planning Permission 10/03861/FUL 7 UKWIN asked the Medworth applicant to direct us to where they had assessed the impact of operating at reduced hours on the operation of the CHP network and with respect to other issues that might arise as a result of closures. Examples of adverse impacts of closures, apart from reducing any benefits from heat and/or electricity export, include vermin and/or fly infestation, and odour issues which can occur if you store waste for long periods of time.	

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		UKWIN also queried what confidence we could have that an operator would rather reduce their hours than source waste from further afield and forfeit gate fees and energy generation payments from operating the facility, especially in light of the potential – even if the draft restrictions were implemented – for waste from further away being capable of entering the facility via a transfer station to circumvent any restrictions on waste origin. Paul Carey for the Applicant responded that reduced hours was one option and that processing 'partial loads' was another option. Mr Carey said that if there were reduced hours the situation would be as if there was an increase in the number of outages. Later in ISH7, the Examining Authority (ExA) returned to this topic and asked if the Applicant had considered any other ways they could manage a reduced amount of waste feedstock. This was an important question from the ExA, especially in light of the acknowledged uncertainties when forecasting future waste feedstock availability. Mike Turner for the Applicant responded that there is the potential to reduce operational hours through increased outages and reduced loading. The ExA then asked the Applicant if the CHP component would be able to operate with reduced hours and output.	

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		The Applicant said it would, but was unable to provide details of where this was stated as evidence in their documents. Paul Carey for the Applicant stated that in the event of a reduced load, this could result in reduced electricity generation to allow for heat output to be maintained. The ExA explained that the question about the impact on the CHP element of the proposal is linked to the claimed benefits of the scheme with respect to electricity and also CHP, and noted that in this eventuality the ExA would like the Applicant to consider (i.e. provide evidence to the Examination regarding) the impacts of reduced operation hours and/or loads because these might impact the benefits of the proposed Medworth scheme, and as such the ExA asked Mr. Carey if he would accept an action to look into the consequences in terms of electricity and CHP. Paul Carey said he would be happy to do so in the form of a technical note. UKWIN hopes that the Applicant's technical note will comprehensively consider all of the matters raised by the Veolia example set out above (and in documents that are being submitted at D6 to accompany UKWIN's submissions) regarding the impact of reduced feedstock on a CHP plant.	
Reduced plastics not offset by reduced food waste			

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	Paras 54 - 64	At ISH7 the Applicant made clear that their WFAA Study Area included many local authorities that are already separately collecting food waste. Speaking on behalf of UKWIN, Josh Dowen noted that UKWIN provided evidence in REP2-066, UKWIN's Written Representation, on this topic (including at paragraph 129) where we noted that the reduction in the amount of plastic would increase the effective capacity (also known as 'operational capacity') of UK incinerators by between 21% and 31%, and that the reason for this range was in part because it depends on how much food waste would also be decreased. Such considerations are also reflected in UKWIN's REP3-050, paragraphs 47-59, and in the evidence submitted by Rt Hon Steve Barclay [REP1-094, electronic page 4]. UKWIN's evidence, including Josh Dowen's input during ISH7, notes that if the Applicant's WFAA Study Area already benefits from a high level of food waste collection this means that, as the Government is proposing significant quantities of plastics removals from the residual waste stream, if this plastics removal comes to pass it would not be counteracted in the WFAA Study Area to as great a degree by reductions in food waste when compared with other areas that have yet to introduce separate food waste collections. 5 This therefore means that the impact in the WFAA Study Area would be towards the upper end of the range of potential impacts (i.e. nearer the 31%	The Applicant disagrees with the IPs assertions and conclusions and refer to the reponse at IP06.

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		capacity increase), within this context of reduced plastics reducing calorific value and therefore increasing the effective capacity of not just the Medworth plant but other facilities in the area (e.g. Rivenhall, Great Blakenham, North Hykeham, etc.) which would then free up capacity at those competing EfW facilities, were it can be expected that they would be capable of processing more waste. This in turn means that the Applicant's use of assumptions about only 88% of the permitted capability being available in the future would no longer hold true, whatever the historic levels of waste processing at these EfW facilities. UKWIN further noted that it is possible that plastic removal could actually result in EfW plants (both within and beyond the WFAA Study Area) increasing their permitted capacity and going beyond their current level of 9 permitted capacity to deal with the issue of reduced calorific value from the reduction in plastic. UKWIN noted that this is an important issue and one that UKWIN has raised in the past, emphasising how UKWIN has not been satisfied with the Applicant's response to date on the topic, and how UKWIN believes it is relevant both at local and national levels in terms of feedstock availability. In response Mike Turner for the Applicant stated that the comments have been noted but that he "would point people back to the fact that the	

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		Waste Fuel Availability Assessment considers future ambitions for recycling and improvements in terms of the 2028 and 2042 targets..." This response from the Applicant ignores the fact that the Applicant's 2028 and 2042 assessments were premised on only 88% of permitted capacity being available and on there being no increases in the capacity that had historically been permitted. To remedy the Applicant's continued failure to adequately model this potential eventuality, UKWIN's assessment of waste fuel availability set out in our D6 response to the Applicant's D5 WFAA includes sensitivity analysis for future effective capacity to increase as the calorific value of available feedstock falls due to the removal of plastics.	
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