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Name: Borough Council of King's Lynn & West Norfolk

Description: Letter

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Borough Council of
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The Rt Hon. Claire Coutinho MP
Secretary of State
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By email: [REDACTED]

2 November 2023

The Rt Hon. Claire Coutinho MP

**Medworth Energy from Waste Combined Heat and Power Facility (EFW),
Wisbech, Cambs.
Planning Inspectorate ref: ENO10110**

The above EFW proposal has passed through the Planning Inspectorate examination phase and you will shortly receive their recommendations regarding consent for this proposal.

We would like to take this opportunity to reinforce the key objections to this proposal as they appear to those of us who represent King's Lynn and west Norfolk but who are also taking a wider national perspective.

We accept that by proposing a very large capacity EFW scheme the developers have barely managed to achieve the status of a significant national infrastructure project and have thus avoided the local authority planning route. Suspicions remain that this manoeuvre has been a tactical one and that the large existing EFW overcapacity means that there must be serious doubts about the fuel supply, and hence claimed generating capacity, if operational status is achieved.

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The proposal would appear to aim to draw waste from a very wide area and to 'cut across' the catchments of other existing EFW plants. If approved the Medworth facility and the now consented nearby Boston EFW will have a combined stated capacity of 1.6 million tons per year in a rural, low population density area far from urban conurbations and significant sources of waste. This is fundamentally counter to the proximity principle which maintains that waste should be treated (by whatever means) close to its points of origin. The infrastructural and carbon footprint aspects of such mass bulk waste transport are a clear additional environmental burden.

The waste for fuel supply situation is further compromised with regard to its composition. In order to fulfil existing EFW fuel supply contracts Local Authorities are increasingly resorting to committing genuinely recyclable materials to be incinerated. Nationally the relationships between authorities contracted to EFW/incinerator facilities and their poor recycling rates has been clearly established. This situation will become more acute as alternative, environmentally acceptable means to recycle a wider range of plastics in larger volumes successfully diverts plastics away from EFW incineration. The existing and growing National EFW overcapacity seriously compromises the UK's efforts to realise a true circular economy with the huge wide-ranging benefits that this would create.

We accept that the nation needs greater electrical generating capacity if it is to meet its local, national, international, and moral targets for greenhouse gas reductions. The net energy production of the Medworth EFW proposal must be weighed against the CO₂ that will be generated as a consequence. The plastics fraction of the waste stream is by far and away the most important energy source in this type of fuel and, notwithstanding the above comments on plastics availability, the simple fact is that every tonne of plastic burnt results in the production of around two tonnes of fossil CO₂. On a tonne-for-tonne basis, it would be less damaging to the atmosphere to burn coal, oil or gas to generate an equal amount of electrical power. The Medworth proposal would be counter to our legal and moral obligations to limit global climate change and its potentially catastrophic consequences.

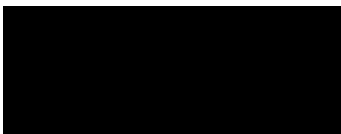
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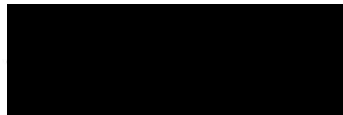
With their typically 40-year design life span, projects such as Medworth will almost certainly (and probably rapidly) be overtaken by developments in green energy production and storage which would provide the capacity and base load security the Nation needs without the environmental consequences of the irresponsible combustion of waste.

We therefore urge the Secretary of State to refuse consent for the Medworth proposal.

Yours sincerely

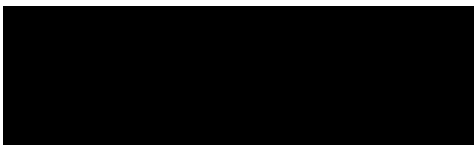


Cllr Terry Parish
Leader of the Council




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Cllr Michael de Whalley
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