



**NORTH
LINCOLNSHIRE
GREEN
ENERGY PARK**

Planning Act 2008

Infrastructure Planning
(Applications
Prescribed Forms and
Procedure) Regulations
2009

North Lincolnshire Green Energy Park

Volume 8

8.2.11 Final Statement of Common
Ground with UKWIN

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GLOSSARY

Acronym	Full term / Description
2008 Act	Planning Act 2008
AGI	Above ground installations
CBMF	Concrete Block Manufacturing facility
CCTV	Closed Circuit Television
CCUS	Carbon Capture, utilization and storage
CO ₂	Carbon Dioxide
DCO	Development Consent Order
DHPWN	District heating and private wire network
ERF	Energy Recovery Facility
ES	Environmental Statement
EV	Electric vehicle
H ₂	Hydrogen
NLGEP	North Lincolnshire Green Energy Park
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
PRF	Plastic recycling facility
RHTF	Residue Handling and Treatment Facility
SoCG	Statement of Common Ground
SoS	Secretary of State
SuDS	Sustainable Drainage Systems

CONTENTS

1.0	Introduction.....	3
1.1	Overview.....	3
1.2	The Proposed Development.....	3
1.3	Parties to this Statement of Common Ground.....	5
1.4	The Purpose and Structure of this Document.....	5
2.0	Summary of Engagement.....	5
3.0	Matters.....	5
4.0	Signatures.....	14

TABLES

Table 2.1:	Summary of Correspondence.....	5
Table 3.2:	List of Matters.....	6

1.0 INTRODUCTION

2.0 Overview

- 2.1.1 This Statement of Common Ground ('SoCG') has been prepared on behalf of North Lincolnshire Green Energy Park Limited ('the Applicant'). It forms part of the application (the 'Application') for a Development Consent Order (a 'DCO'), that has been submitted to the Secretary of State (the 'SoS') for Business, Energy and Industrial Strategy, under Section 37 of 'The Planning Act 2008' (the '2008 Act').
- 2.1.2 The Proposed Development meets the criteria to be considered as an NSIP under the 2008 Act as a 'generating station' under section 15(2). Section 15(2) defined an NSIP as a proposed generating station which would be located within England, would not be offshore, and would have a total generating capacity of more than 50MW.

3.0 Parties to this Statement of Common Ground

- 3.1.1 This SoCG is between North Lincolnshire Green Energy Park Limited (the Applicant) and United Kingdom Without Incineration Network (UKWIN).
- 3.1.2 UKWIN is a network of anti-incineration campaigners coordinated through a not-for-profit company.

4.0 The Purpose and Structure of this Document

- 4.1.1 The purpose of this document is to summarise clearly the agreements reached between the parties on matters relevant to the examination of the Application and to assist the Examining Authority in their determination of the Application. It has been prepared with regard to the guidance in 'Planning Act 2008: examination of application for development consent' (Department for Communities and Local Government, March 2015).
- 4.1.2 The document is structured as follows:
- Section 2 – sets out the key correspondence and engagement between the parties up until the submission of the Application; and,
 - Section 3 – sets out the matters agreed and matters outstanding between the parties in respect of the Application.

5.0 SUMMARY OF ENGAGEMENT

- 5.1.1 The below Table 2.1 contains a record of key correspondence and engagement between the Applicant and UKWIN pertinent to this SoCG.

Table 2.1: Summary of Correspondence and Engagement

Date	Attendance	Topics Covered
03/02/2023	NLGEP, UKWIN	Call to discuss initial draft SoCG and matters to include.
27/03/2023	NLGEP, UKWIN	Call to discuss next draft SoCG and matters to include.

6.0 MATTERS

6.1.1 The below Table 3.2 contains a list of 'matters agreed' along with a concise commentary of what the item refers to and how it came to be agreed between the two parties.

6.1.2 A column indicating the status of the matter has been included:

- Green indicates the matter is agreed;
- Amber indicates the matter is under discussion; and,
- Red indicates the parties are not in agreement over this matter.

Table 3.2: List of Matters

UKWIN POSITION	APPLICANT POSITION	STATUS
Position stated in the RDF Supply Assessment document (with analysis as updated in REP3-022)		
<p>Data sources for waste arising The data sources used by the Applicant are not disputed.</p> <p>REP6-043 is UKWIN’s latest assessment (submitted as UKWIN’s response to the Examining Authority’s Second Written Questions), which is summarised below. This is based on the Applicant’s 22Mt figure for the base year of 2020 as agreed at ISH3, but with respect to the figures for 2027 and 2042 and in the run-up to those years UKWIN took into account the Applicant’s figure of 1.7Mt of RDF exported in 2020 provided by the Applicant on electronic page 6 of REP5-03.</p> <p>This is supplemented by UKWIN’s other submissions, including those made at Deadlines 7, 8 and 9.</p>	<p>Data sources for waste arising</p> <ul style="list-style-type: none"> - The data source used for analysis of historical household waste used within the application is DEFRA’s WasteDataFlow dataset, covering all local authority collected waste. - The data source used for analysis of historical commercial and industrial (C&I) waste is DEFRA’s Waste Data Interrogator database. This has been filtered to exclude waste shipments: <ul style="list-style-type: none"> - with Basic Waste Category “Hazardous” and “Inert/C+D”; and/or - EWC Waste Chapters apart from 01 (Mine and quarry wastes), 17 (Construction & demolition), 19 (Waste water); and/or - with a Site Category which does not correspond to final treatment (e.g. transfer, storage); and/or - with R/D codes corresponding to transfer. <p>This point, which reflects the data source used in the Applicants assessments, was discussed with UKWIN.</p>	
<p>Data source for export and landfilled volumes The data sources used by the Applicant are not disputed. See above.</p>	<p>Data source for export and landfilled volumes Locally-specific and export data has been collated by Footprint Services from publicly available site waste returns, RDF transfrontier shipment records, and requests made under Freedom of Information regulations (REP2-039 and REP2-040).</p> <p>This point, which reflects the data source used in the Applicants assessments, was discussed with UKWIN..</p>	
<p>Data source for recycling rates</p>	<p>Data source for recycling rates</p>	

<p>The data sources used by the Applicant are not disputed.</p>	<p>Historic recycling rates for local authority collected waste has come from “Statistics on waste managed by local authorities in England in 2020/21”, DEFRA, December 2021, Table 3.</p> <p>This point, which reflects the data source used in the Applicants assessments, was discussed with UKWIN.</p>	
<p>Waste as a Fuel (Waf) in 2020 Agreed, as confirmed to the ExA as ISH3.</p> <p>UKWIN’s position, set out in its evidence, is that the Applicant’s approach effectively abandons the 22 million tonne starting point as this figure is not used throughout the Applicant’s projections of future waste arisings to determine what fraction of the wider waste stream would be of a type that is available as incinerator feedstock.</p>	<p>Waste as a Fuel (Waf) in 2020 It is agreed that 22 million tonnes of waste is an appropriate 2020 Baseline figure for residual waste available for use as a fuel in England (see para 3.5.5.2 of the RDF Supply Assessment)</p>	
<p>Relevance of residual waste targets Agreed, as confirmed to the ExA as ISH3.</p> <p>As set out in REP6-042 and REP6-043, UKWIN interprets Interim Target 3 in line with the Government’s definition set out in EIP 2023 and the definition in the Resources and Waste Strategy, which means that the use of the term ‘municipal waste’ – within the context of compliance with the target – goes beyond Local Authority Collected Waste to include commercial waste similar to household waste even where it is not collected by or on behalf of local authorities.</p>	<p>Relevance of residual waste targets It is agreed that it is reasonable to present a base scenario where waste projections meet Government targets in line with the request from the Examining Authority at ISH3, noting that the Applicant considers this to be a conservative approach.</p> <p>It is agreed that this includes the target to meet the residual waste reduction target and associated interim targets set out in the Environmental Improvement Plan 2023.</p>	
<p>Population estimates Agreed.</p> <p>It is also agreed that it is acceptable to estimate regional</p>	<p>Population estimates It is agreed that the 2020-based ONS population figures for England indicate a 2020 population figure of around 56.6 million people, a 2027 population figure of around 58 million people and a 2042 population of around 60 million people.</p>	

<p>and local population figures based on the 2018-based ONS population figures as equivalent sub-national population figures have yet to be published by the ONS based on the 2020-based ONS population figures.</p>	<p>It is agreed that the 2020-based ONS population figures for England are an appropriate basis for converting per capita calculations into England-wide waste arisings figures.</p>	
<p>Approach to projecting waste as a fuel (WaF) Not agreed.</p> <p>The Applicant's 12% approach divorces their estimates from the anchor of 22 million tonnes of waste as a fuel in 2020 as agreed at ISH3.</p> <p>While it would be reasonable for the purpose of the assessment to include waste historically exported as being available by 2027, the Applicant's approach goes beyond simply including historic RDF exports and instead appear to come up with a completely different way of determining how much of the wider waste stream should be considered a fuel.</p> <p>As set out in REP6-043, UKWIN's approach is that the national (English), regional and North Lincolnshire figures all start with the Applicant's 22Mtpa figure or sub-national equivalent and then, while taking into account population growth, assumes that these waste per capita fractions will:</p> <ul style="list-style-type: none"> • remain stable from 2020 through 2023 • fall linearly between 2024 and 2027 to 297.56kg per capita to account for waste (RDF) previously exported and for the UK Government's 29% municipal residual waste reduction target; and • fall linearly between 2028 and 2042 to 209.55kg 	<p>Approach to projecting waste as a fuel (WaF) For its 'targets met' scenario, the RDF Supply Assessment (as extended to 2042 in REP3-022) projects 0.253te/capita in 2042. (This is less than Government target for total residual waste arising of 0.287te/capita because the difference - around 12% - is assumed to be not available/suitable for energy recovery (noting that this 12% assumption is more conservative than the figure of 10% quoted by UKWIN at ISH3)). A population of 60m is assumed in 2042, based on ONS forecast. On 31 January 2023, DEFRA published its Environmental Improvement Plan 2023. This includes intermediate targets for residual waste reduction:</p> <ul style="list-style-type: none"> • Interim Target 1: Total residual waste (excluding major mineral wastes) not exceeding 0.437te/capita/yr by 31 January 2028. The updated RDF Supply Assessment in REP3-022 projects 0.33te/capita in 2027 in the Targets Met scenario (18.9mte and 58m people). • Interim Target 2: Total residual waste (excluding major mineral wastes) not exceeding 25.5mtes/yr by 31 January 2028. The updated RDF Supply Assessment in REP3-022 projects 18.9mtes in 2027 in the Targets Met scenario. • Interim Target 3: Total municipal residual waste not exceeding 0.333te/capita/yr by 31 January 2028. The updated RDF Supply Assessment in REP3-022 projects 0.20te/capita of Local Authority collected waste in 2027 in the Targets Met scenario (11.7mte and 58m people). <p>The Applicant's position is that its Targets Met scenario projections are consistent with these interim targets.</p>	

per capita to account for waste (RDF) previously exported and to meet the UK Government's target to halve municipal waste by 2042.

As set out in REP6-042 and REP6-043, UKWIN's position is that projections based on the municipal residual interim target are closer to the feedstock that was used to arrive at the residual waste available figure of 22 million and closer to the arisings that incinerators tend to use as feedstock.

UKWIN's position is that UKWIN's projections are consistent with the targets being met, but that the Applicant's projections are not consistent with the targets being met. UKWIN's position is set out in more detail as part of REP4-042, electronic pages 2-4 and in REP6-043.

As set out above, the Applicant appears to have misunderstood the meaning of the term 'residual municipal waste' within the context of Interim Target 3, and this appears to have significantly impaired their assessment of the compliance of their 'targets met' scenario with the Government's targets.

As explored in detail in REP6-042, the Applicant's statement that their approach of subtracting 12% from the arisings figure to account for the fact that not all waste would be available as a fuel is 'more conservative than the figure of 10% quoted by UKWIN at ISH3' is incorrect. This is because UKWIN's figure for potential incinerator feedstock was based on 90% of municipal

<p>residual waste, whereas the Applicant’s 88% figure is based on total residual waste.</p> <p>For example, the UK Government’s Environmental Improvement Plan states that for 2027 municipal residual waste arisings should not exceed 333kg per capita. 90% of 333kg would be 299.7kg per capita and 88% of this would be 293.04kg per capita. When combined with the agreed ONS English population projection of 58.061 million people in 2027, this would result in a capacity estimate of 17.40Mt at 90% of residual municipal waste or 17.01 at 88% of residual municipal waste. However, the Applicant’s estimate for 2027 in the ‘AFRY Targets Met’ scenario is 18.9Mt which is higher than figures calculated in line with UKWIN’s ISH3 approach.</p>		
<p>WaF projections</p> <p>As set out above, UKWIN does not believe that the Applicant’s projections are reasonable and so UKWIN provides alternative figures in REP6-043 which we believe to be reasonable.</p>	<p>WaF projections</p> <p>REP6-042 shows projected total waste arising assuming recycling and waste reduction targets are met, noting that DEFRA describes the 0.287te/capita target as ambitious but achievable.</p> <p>In the Environmental Targets Consultation Summary of Responses and Government Response dated 16th December 2022, Defra stated that: “We set the target ambition at the upper limits of achievability based on our evidence base, satisfying the Environment Act 2021 requirements for targets to be met” and that “Whilst we want targets to be stretching, there is a need for them to be achievable. This is a legal requirement included in the Environment Act 2021, stating that the Department of Environment Food & Rural Affairs Secretary of State must be ‘satisfied’ the target can be met before making target regulations.”.</p>	
<p>Operating capacity</p> <p>UKWIN agrees that 15,649kte is a reasonable estimate of</p>	<p>Operating capacity</p> <p>The committed facilities and capacities within Table A6 of the RDF Supply</p>	

<p>the permitted capacity of currently operational municipal waste incinerators in England.</p>	<p>Assessment were updated slightly for the analysis in REP3-022, and an updated table is shown in this document (at the end of this List of Matters). The total capacity of 15,649kte within this updated Table is considered a reasonable portrayal of committed facilities and capacities to base the RDF supply assessment on.</p>	
<p>Capacity under construction UKWIN agrees that 4,727 kte is a reasonable estimate of the permitted capacity of municipal waste incinerators currently under construction in England.</p>	<p>Capacity under construction The under construction facilities and capacities within Table A7 of the RDF Supply Assessment were updated for the analysis in REP3-022 and REP6-032, and the updated table is shown in this document. The update takes into account that the capacity of Protos has been confirmed as 500ktpa. (Note that the equivalent table in REP6-032 incorrectly stated this as still being 410kpa, but a figure of 500ktpa was used in the analysis). Total capacity under construction is therefore now 4,727 ktpa.</p>	
<p>Consented projects UKWIN agrees that 9,097 kte is a reasonable estimate of consented EfW projects which are considered to still be under development. This figure includes 500 kte of waste-to-SAF capacity for one facility that is within the Yorkshire & Humber region.</p>	<p>Consented projects The consented facilities and capacities within Table A8 of the RDF Supply Assessment were updated slightly for the analysis in REP3-022, and an updated table is shown in this document (at the end of this List of Matters). The total capacity of 9.0mte within this updated Table is considered a reasonable portrayal of consented facilities and capacities to base the RDF Supply Assessment on. These are consented projects which are considered to be still under development.</p>	
<p>Closures, e.g. due to carbon capture or facility age UKWIN's position is that the only closure that should be taken into account is that of Edmonton, as it is expected that this will close to allow for the replacement capacity. UKWIN does not believe that it is appropriate for the purpose of Waste Fuel Availability analysis to make assumptions based on speculated closures that have not been announced or confirmed by the operator.</p>	<p>Closures, e.g. due to carbon capture or facility age The applicant has assumed an operating life of 50 years for all facilities with the following exceptions: - Eastcroft (non-R1 built in 1973), is assumed to close in 2033 - Stoke (non-R1 built in 1997) is assumed to close in 2028 following a press article (ENDS Bioenergy&Waste, 10 May 2022) - The other facilities assumed to close before 2042 are Edmonton (which is being replaced by a facility currently under construction), and Coventry (non-R1, built in 1975, assumed to close in 2025)</p>	

<p>Existing facilities have permanent planning permission and economic incentives to continue to operate even if this requires investment in refurbishment and/or charging reduced gate fees, especially where they (like Eastcroft) are being relied upon to provide heat as part of an existing district heating scheme.</p> <p>In the event that operators fail to secure planning permission to enable planned replacement incinerators for existing operational capacity, this would be expected to result in existing operational facilities being refurbished and their operational lifetimes extended.</p> <p>Further detail on UKWIN's position is set out in UKWIN's evidence, including REP6-042, REP4-042 electronic pages 5-6, REP4-045 electronic pages 2-3, and elsewhere.</p>	<p>Note that these are all non-R1 facilities – see point on Non-R1 projects below.</p> <p>The Applicant's view is that very old facilities will be replaced by more modern facilities rather than being refurbished – as is evidenced by the Edmonton example. 'Permanent planning permission' does not apply in this case – a new planning consented was required for the new Edmonton facility and for the new line at Eastcroft.</p>	
<p>Achieved capacity factor</p> <p>UKWIN's position is that the agreed operating capacity figure – permitted capacity – should be considered the central figure for analysis as assuming facilities would operate below their currently permitted capacity is likely to underestimate future usage once plastics are removed from the residual waste stream thereby necessitating facilities to treat more WaF to maintain their MW generation levels and maximise gate fee income.</p>	<p>Achieved capacity factor</p> <p>For operating plants the Applicant assumes an annual capacity factor based on historic data as reported by Tolvik ("UK Energy from Waste Statistics – 2021), averaged across last three years. For new plants we assume 90%. The capacity factor is defined as the tonnage accepted in the year divided by the permitted capacity. We do not speculate on potential changes to CV and the ability of particular plants to accept more waste as a result.</p>	
<p>Non-R1 projects</p> <p>UKWIN's position is that non-R1 projects should not be excluded from the assessment. R1 status is not relevant to residual waste treatment capacity calculations as non-</p>	<p>Non-R1 projects</p> <p>Non-R1 projects have been excluded from the Applicant's earlier assessments as they are lower down the waste hierarchy. Paragraphs 2.22-232 of REP5-037 provides more detail.</p>	

<p>R1 plants would still use waste as a fuel and therefore reduce the amount of waste available to service new capacity. Furthermore, the applicant has not demonstrated that plants that do not currently have R1 designation could not obtain such designation in the unlikely event that the Government suddenly made R1 status a requirement for existing facilities. See REP6-042 electronic pages 8-11.</p>		
<p>Use of municipal waste as cement kilns in 2020 Agreed</p>	<p>Use of municipal waste as cement kilns in 2020 375kte/yr of SRF used was used in cement kilns in 2020. This assumption is taken from 2021 figure as reported in Tolvik UK Energy from Waste Statistics 2021.</p>	
<p>Projections of future cement kiln use UKWIN's position is that cement kiln use is likely to increase to around 1 million tonnes by 2030 and then remain stable (REP6-043 & page 6 of REP2-111).</p>	<p>Projections of future cement kiln use The 375kte/yr of SRF is held constant going forwards.</p>	
<p>RDF exports for 2024-2026 UKWIN's position is that we do not expect there to be any ban on RDF exports, and that in the event that 'waste as a fuel' has no viable domestic treatment destination it would be more likely for this 'WaF' feedstock to be exported as RDF to be recovered abroad at facilities connected to district heating schemes / CHP networks rather than landfilled domestically.</p> <p>However, as set out above, when considering the impact of residual waste reduction targets on waste as a fuel it would be reasonable to include historic levels of RDF export when calculating the levels of reduction that would be needed to meet Government targets.</p>	<p>RDF exports for 2024-2026 RDF exports are assumed to be zero from 2024.</p>	

<p>As such, we assume RDF export reducing between 2024 and 2027 as the remaining fraction of that RDF becomes potentially 'available' assuming that existing short-term RDF export contracts will increasingly come up for renewal and could therefore be displaced by domestic capacity if such capacity were available.</p>		
<p>RDF exports from 2027 onwards As above, it is agreed to assume that no RDF will be exported from 2027 onwards for the purposes of determining how much waste would be available – with the caveat that it is likely that RDF export would be used in the event that there was insufficient alternative residual waste treatment capacity.</p>	<p>RDF exports from 2027 onwards Assumed to be zero.</p>	
<p>MBT Removals UKWIN is willing to accept the 1.9mte/y MBT removal figure for the purpose of the SoCG modelling.</p>	<p>MBT Removals The analysis assumes 1.9mte/yr of material is removed in processing of residual waste to derive RDF, as per paragraph 3.7.2.2 of the RDF Supply Assessment (REP3-041).</p>	
<p>Waste treatment capacity of SAF which obtained Advanced Fuel Fund funding Agreed.</p> <p>On 22nd December 2022, the UK Government announced 'Advanced Fuels Fund (AFF) competition winners', three of which intended to convert waste into SAF (REP4-047 and REP4-049).</p> <p>As set out in REP6-042, UKWIN's position is that these plants would be targeting the same sort of waste as fuel as would be targeted by incinerators and as such this capacity is highly relevant to considering how much waste</p>	<p>Waste treatment capacity of SAF which obtained Advanced Fuel Fund funding Based on feedstock volumes published on the relevant developer websites the total feedstock requirement, should all three facilities proceed, would be 2.1 million tonnes (as set out in paragraph 2.13 on page 8 of REP5-037).</p> <p>The capacities are:</p> <ul style="list-style-type: none"> • 500ktpa for Altalto • 600ktpa for Fulcrum • 1,000ktpa for Lighthouse Green Fuels figures 	

<p>would be available for use as incinerator feedstock and the impacts of consent being granted/refused.</p>		
<p>Targets</p>		
<p>As discussed further above, UKWIN’s position is that the target to reduce residual waste by 29% by 2027 and by 50% by 2042 are the relevant targets to use. The 24% target interim is likely to underestimate the required contribution from the reduction in residual waste required from the intended feedstock, which is primarily made of municipal waste which includes C&I waste of a similar composition to household waste.</p>	<p>Future residual waste target is as published in “Environmental targets consultation: Summary of responses and government response”, December 2022. The target is a 50% reduction by 2042 of residual waste (excluding major mineral wastes), compared to the 2019 level of 574kg/capita.</p> <p>Interim targets were subsequently set out in the Environmental Improvement Plan 2023 to underpin the 2042 target. This includes a target to reducing residual waste (excluding major mineral wastes) produced per person by 24% per capita in 2027 and to reduce municipal residual waste produced per person by 29% per capita in 2027 compared to a 2019 base year.</p>	
<p>Supply/Capacity Match Modelling</p>		
<p>The Applicant and UKWIN’s respective positions are summarised in our respective responses to ExQ2, i.e. REP6-037 and REP6-042. Whilst there is some overlap, e.g. the 22mte starting point agreed at ISH3, the approaches differ in several significant respects. A number of the areas of agreement and disagreement are set out above.</p>		
<p>Feedstock Composition</p>		
<p>Whilst UKWIN agrees that the Applicant’s assumptions regarding feedstock composition underpin their climate and greenhouse gas assessment in the ES, we dispute the plausibility of the assumptions adopted by the Applicant, both due to the final figures adopted and the process by which they were derived. The unresolved uncertainty regarding the feedstock composition increases the uncertainty regarding the Applicant’s claimed GHG benefits for the proposal.</p>	<p>The Applicant’s assumptions regarding feedstock composition underpin the climate and greenhouse gas assessment in the ES (APP-054). These assumptions were shared with UKWIN via Appendix 1 of Document Reference 9.4 Written Summaries of oral submissions put at Issue Specific Hearing 1 [REP1-015], published on the Planning Inspectorate website on 2 December 2022.</p>	

UKWIN has also highlighted concerns regarding internal inconsistencies in the Applicant's claims regarding how much metal would be recycled, with the GHG assessment assuming a higher level than was set out in the Planning Statement and the RDF Supply Assessment.

UKWIN has also noted inconsistencies between the Applicant's claims about recyclable material being removed as part of the RDF production process made elsewhere in their submissions with their climate assessment which assumes a high level of metals which could have been removed as part of the RDF production process (left in supposedly on the basis that the Applicant cannot control operators in terms of removing material for recycling).

UKWIN has also noted that the Applicant's assumption regarding incinerating high levels of paper, card and wood - and potential intention to maintain a high level of biogenic waste - could indicate that the North Lincolnshire plant could be competing with recycling facilities for these materials.

UKWIN's position remains that neither the Applicant's central assumption for feedstock composition nor their sensitivity analysis provide a reasonable likely or reasonable worst case basis for assessing the likely GHG impacts of the development. UKWIN believes that the GHG impacts could be worse than the Applicant's 'worst case' assumptions.

<p>Feedstock assumptions inform assumptions regarding the carbon content, biogenic carbon content, and DDOC assumptions and can have a significant impact on the direct and net GHG impacts of the facility. UKWIN has provided evidence to indicate that Applicant assumptions in these regards are optimistic and contrived, and that there remains significant uncertainty regarding the feedstock composition which adds to uncertainty regarding the Applicant’s GHG assessment.</p> <p>The Applicant has not limited their RDF Supply assessment to match the feedstock they are assuming for their GHG assessment.</p>		
<p>Draft Development Consent Order</p>		
<p>UKWIN’s position is that neither Requirement 15 nor permit limitations on waste type would ensure compliance with the Waste Hierarchy.</p> <p>UKWIN summarised its reasons for this position at ISH3 and provided further details and evidence at Deadline 4 which also includes suggestions to improve the transparency and usefulness of the waste compositional analysis element of the requirement (REP4-045 and Appendix A, REP4-046, REP4-048, REP4-051, and REP4-052).</p> <p>UKWIN provided further additional information on its position in REP6-042 (electronic pages 14-15) and</p>	<p>Requirement 15 of the dDCO and the EA permit together will restrict the plant to the types of waste it is able to accept and ensure compliance with the waste hierarchy.</p>	

confirmed that we have concerns with respect to both the Applicant's original and revised versions of Requirement 15.		
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7.0 SIGNATURES

7.1.1 This Statement of Common Ground is agreed:

On behalf of United Kingdom Without Incineration Network (UKWIN)


Name: Shlomo Downen

Signature: Shlomo Downen

Date: 9th May 2023

On behalf of the Applicant:

Name: David Jones

Signature: 

Date: 10th May 2023

Updated Table A6 - Operational Energy from Waste plants in England

Name of Plant	Region	Capacity (kte)	Assumed capacity factor	Assumed CCS potential	R1 status
Advanced Plasma Power Pilot Plant	South West	13	90%	No	No
Allerton Waste Recovery Facility	Yorkshire and Humber	320	80%	No	Yes
Allington EfW Plant	South East	560	82%	No	Yes
Ardley Energy Recovery Facility	South East	326	92%	Med	Yes
Avonmouth Resource Recovery Centre	South West	377	90%	Med	Yes
Battlefield ERF	West Midlands	102	96%	No	Yes
Beddington Energy Recovery Facility	London	347	88%	Med	Yes
Bolton WtE plant	North West	120	48%	No	No
Cornwall Energy Recovery Centre	South West	240	99%	No	Yes
Cory Riverside Energy	London	785	95%	Med	Yes
Coventry EfW Plant	West Midlands	315	96%	No	No
Devonport EfW CHP Facility	South West	265	97%	Med	Yes
Dudley EfW plant	West Midlands	105	92%	No	No
Eastcroft EfW plant	East Midlands	200	94%	No	No
EnviRecover	West Midlands	230	91%	No	Yes
Exeter Energy Recovery Facility	South West	60	99%	No	No
Ferrybridge Multifuel 1 (FM1)	Yorkshire and Humber	725	88%	High	Yes
Ferrybridge Multifuel 2 (FM2)	Yorkshire and Humber	725	89%	High	Yes
Gloucestershire (EfW) plant (Javelin)	South West	190	98%	No	Yes
Great Blakenham EfW plant	Eastern	295	96%	No	Yes
Greatmoor	South East	345	87%	No	Yes
Integra North (Chineham)	South East	110	90%	Med	Yes
Integra South West (Marchwood)	South East	220	95%	Med	Yes
Kirklees EfW plant	Yorkshire and Humber	150	87%	No	Yes
Lakeside Energy from Waste facility	South East	450	91%	Med	Yes
Leeds Recycling & ERF	Yorkshire and Humber	190	94%	Med	Yes
Lincolnshire EfW Plant	East Midlands	190	93%	No	Yes
LondonWaste ERF (Edmonton)	London	675	84%	No	No
Milton Keynes Waste Recovery Park	South East	132	64%	No	No
Newhaven Energy Recovery Facility	South East	242	94%	Med	Yes
Newlincs EfW plant	Yorkshire and Humber	56	93%	High	No
Peterborough Energy Recovery Facility	Eastern	85	95%	No	Yes
Portsmouth Energy Recovery Facility	South East	220	91%	Med	Yes
Runcom EfW plant	North West	1100	87%	High	Yes
SELCHP Energy Recovery Facility	London	464	89%	No	Yes
Sevenside Energy Recovery Centre	South West	467	86%	Med	Yes
Sheffield Energy Recovery Facility	Yorkshire and Humber	245	95%	Med	Yes
Stoke EfW Plant	West Midlands	210	88%	No	No
Tees Valley EfW Facility (Billingham)	North East	756	89%	High	Yes
Tyseley Energy Recovery Facility	West Midlands	441	82%	Med	Yes
W2R Staffordshire ERF	West Midlands	340	99%	Med	Yes
Wheelabrator Kemsley (K3)	South East	657	80%	Med	Yes
Wilton 11 EfW Plant	North East	500	90%	High	Yes
Wolverhampton EfW Plant	West Midlands	118	96%	No	No
Enviropower Lancing	South East	75	83%	No	No
Hooton Bio Power	North West	266	90%	High	Yes
Rookery Pit	Eastern	585	90%	Med	Yes
Surrey ECO Park	South East	60	90%	No	No

Updated Table A7 - Energy from Waste plants under construction in England

Name of Plant	Region	Capacity (kte)	Assumed capacity factor	Assumed CCS potential	Assumed R1 status
Baddesley EfW plant	West Midlands	130	90%	No	Yes
Bridgwater Resource Recovery	South West	123	90%	No	Yes
Drakelow Renewable Energy Centre	East Midlands	169	90%	No	Yes
Energy Works Hull	Yorkshire and Humber	240	90%	High	Yes
Isle of Wight	South East	30	90%	No	Yes
Lostock Sustainable Energy Plant	North West	600	90%	High	Yes
Newhurst Quarry EfW plant	East Midlands	350	90%	No	Yes
Protos EfW plant	North West	500	90%	High	Yes
Slough Multifuel	South East	480	90%	Med	Yes
Edmonton EcoPark	London	700	90%	Med	Yes
Skelton Grange EfW Plant	Yorkshire and Humber	410	90%	No	Yes
Wren Power and Pulp (Rivenhall Airfield)	Eastern	595	90%	No	Yes
Wheelabrator West Bromwich	West Midlands	400	90%	No	Yes
Total		4727			