Comments on Applicant's undated letter

UKWIN COMMENTS ON APPLICANT'S LETTER DATED 25TH SEPTEMBER 2024

Proposed Development:
North Lincolnshire Green Energy Park

Proposed Location:
Flixborough Wharf, Flixborough Industrial Estate, North Lincolnshire

Applicant:
North Lincolnshire Green Energy Park Limited

Planning Inspectorate Ref:
EN010116

Registration Identification Ref:
20031828

8TH OCTOBER 2024

UKWIN
United Kingdom Without Incineration Network

UKWIN COMMENTS ON APPLICANT'S 25 SEPTEMBER 2024 LETTER SUBMITTED FURTHER TO THEIR 27 AUGUST LETTER

1. The Applicant's letter dated 25 September 2024 was published earlier today. We wish to comment on that letter to challenge and/or provide context for the statements made by the Applicant.
2. Where relevant, we will refer to our previous letter dated August 2024, which commented on the Applicant's undated response to the Ministerial Statement of 18 July 2024, and other previous submissions.

ALIGNMENT WITH BRITAIN'S CLEAN ENERGY STRATEGY

3. The Applicant's 25 September 2024 letter states:

   "Further to our letter dated 27 August 2024, we were delighted to note the new Government's support for advancing Britain's clean energy strategy at the Energy UK conference on 17 September 2024.

   As detailed in our earlier letter, dated 27 August 2024, there is absolute alignment with the North Lincolnshire Green Energy Park project outcomes including integrated carbon capture, utilisation and storage, clean power and net zero targets achievement by 2030, hydrogen technologies and associated rapid employment growth."

4. We dispute the Applicant's characterisation of their proposal as having absolute alignment with Britain's clean energy strategy.
5. For example, the Secretary of State for Energy Security and Net Zero, the Rt Hon Ed Miliband MP, in his speech to the Energy UK conference stated on 17 September 2024 that: "…so as long as we are dependent on fossil fuels, no matter where they come from, we will be stuck on the rollercoaster of volatile international markets…". (emphasis added)
6. According to Table 5 of the climate chapter of the Applicant's Environmental Statement [APP-054], 41.6% of the carbon that would be incinerated at the proposed North Lincolnshire incineration plant would be fossil carbon.
7. The Applicant also indicates in Table 2 of the Applicant's REP1-015 that the residual household waste that would contribute to the RDF feedstock would include 8.2% plastic film and 7.8% dense plastics as well as other plastic-containing materials such as textiles and miscellaneous combustibles.
8. Table 3 of REP1-015 indicates that the residual C&I waste that would contribute to RDF feedstock would be comprised of 11.5% plastic film and 11.4% dense plastic.

9. As plastic that is incinerated to generate electricity is a fossil fuel, this means the proposed North Lincolnshire incineration plant could be dependent for feedstock on burning significant quantities of fossil fuels.

10. While there could be a world in which plastic is significantly removed from all incinerator feedstocks, due to the high calorific value of this feedstock, such removal of plastic for use as incinerator feedstock would significantly increase the feedstock demands for existing incinerators and would therefore exacerbate the level of incineration overcapacity (see REP2-111), further undermining a different element of the Applicant's case.

11. On 17 September 2024 the Secretary of State for Energy Security and Net Zero also stated that: "our whole mandate is about for clean power by 2030".

12. As noted on electronic page 68 of REP3-022, UKWIN's Written Representation [REP2-110] set out how: "According to the Applicant, the [North Lincolnshire incineration] facility would have a similar carbon performance to landfill. It is hard to see how that could be described as 'low carbon'. The plant could be considered to generate electricity with a fossil carbon intensity of 548gCO2e/kWh, which is higher than unabated CCGT and significantly higher than the BEIS marginal electricity mix".

13. As such, unless the plant operates with full CCUS (which is not confirmed) the proposed incinerator would clearly hinder rather than support our efforts to reach 'clean power by 2030'.

14. In terms of CCUS capability, we dispute the characterisation of the North Lincolnshire proposal as 'including integrated carbon capture, utilisation and storage'. As UKWIN has rebutted similar claims within our previous submissions we do not need to further address them in great detail below.

15. As noted in our comments on the Applicant's letter of 27 August 2024, the situation we set out in REP2-108 and REP9-050 still persists, which is that the North Lincolnshire proposal falls outside of the potential Humber pipeline cluster and therefore should be considered not to benefit from any assumption that it is likely to connect to that cluster even if the Humber cluster pipeline is progressed.

16. In our comments on the Applicant's letter of 27 August we also noted that the Humber Carbon Capture Pipeline Consultation brochure (dated July 2024) confirms our position. UKWIN drew attention to the map on pages 5 and 6 of the Consultation brochure, which clearly excludes the proposed development site.

17. It is further noted that the proposed Humber Carbon Capture Pipeline was not one of the Carbon Capture Pipelines to benefit from the recently announced Government funding, in contrast to both the HyNet proposal in the North West and Net Zero Teesside in the North East.

18. As distinct from the conventional carbon capture discussed above, the Applicant also claims credit for a different, smaller-scale, process that is of a wholly different (and much smaller) order of magnitude.

19. With respect to this claim, UKWIN's comments on the Applicant's letter of 27 August noted the point we made in our Written Representation [REP2-110] which is that the Applicant's mineralisation of CO_2 within flue gas condensate residues would, according to the Applicant, only capture around 6.34% of the proposed EfW incinerator's total CO_2.

20. Finally, we note that while the Secretary of State for Energy Security and Net Zero's speech of 17 September makes numerous references to wind, and to solar, and to nuclear it does not make even one single explicit reference to new 'Energy from Waste' or to incineration capacity as being relied upon to meet Britian's clean energy targets.

20 SEPTEMBER 2024 SECRETARY OF STATE LETTER TO DEFRA

21. As set out below, the Applicant's comments on the Secretary of State's 20 September 2024 letter to Defra are often wide off the mark with respect to the Applicant's interpretation of Government policy, and while they complain about a lack of data the reality is that UKWIN has data that indicates how overcapacity is worse than previously assessed.

22. This data, held by UKWIN and submitted as an appendix to this letter, can be taken into account even if Defra's data is not made available in time for the decision.

Interpretation of EN-1 and EN-3 and 'Our Waste, our resources'

23. The key focus of the Secretary of State's 20 September letter is about assessing compliance with the EN-1 requirement that "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".

24. As detailed by UKWIN in PID-002, REP9-051, and REP8-040, and in our submissions from January 2024, any interpretation of EN-1 that fails to recognise that the Government has concerns about EfW overcapacity at both local and national levels, and that the Government wishes to use the National Infrastructure Planning system to avoid such overcapacity, misses the point of the EN-1 policy cited in the letter and other associated policies.

25. The Applicant discussed energy strategy in their 25 September 2024 (see above), and as such it is worth highlighting that footnote 36 of EN-1 makes it clear that any energy generation benefits of Energy from Waste do not justify building plants that are not needed for waste management.

26. Specifically, paragraph 3.2.3 of EN-1 states: “With the exception of new coal or large-scale oil-fired electricity generation [Footnote 36] the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government’s ambitions in energy policy and other policy areas”.

27. The associated footnote 36 states clearly that: “A further exception to this [general support for new energy generation capacity] is EfW plants where the primary function is to treat waste and planning decision will be made on the demand for waste infrastructure. See EN-3 for further detail”.

28. Turning to EN-3, this policy document makes clear that:

    a) “Applicants must ensure EfW plants are fit for the future, do not compete with greater waste prevention, re-use, or recycling and do not result in an over-capacity of EfW waste treatment provision at a local or national level”. (EN-3 paragraph 2.7.29) (emphasis added)

    b) “[EfW] Applicants should undertake an assessment of the proposed waste combustion generating station examining the conformity of the scheme with the waste hierarchy and the effect of the scheme on the relevant Waste Local Plans or plans where a proposal is likely to involve more than one local authority”. (EN-3 paragraph 2.7.43)

    c) “[EfW] 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”. (EN-3 paragraph 2.7.44) (emphasis added)

    d) “[EfW] Applicants must ensure proposals do not result in an overcapacity of EfW waste treatment provision at a local or national level”. (EN-3 paragraph 2.7.54) (emphasis added)

    e) “The Secretary of State should be satisfied, with reference to the relevant waste strategies and plans, that the proposed [EfW] waste combustion generating station is in accordance with the waste hierarchy and of an appropriate type and scale so as not to prejudice the achievement of local or national waste management targets in England...Where there are concerns in terms of a possible conflict, evidence should be provided to the Secretary of State by the applicant as to why this is not the case or why a deviation from the relevant waste strategy or plan is nonetheless appropriate and in accordance with the waste hierarchy…” (EN-3 paragraphs 2.7.102 – 2.7.104) (emphasis added)

29. These policy statements are helpful to the determination of this proposal in that they reveal the Government's thinking as follows:

    a) EfW facilities have the potential to compete with greater waste prevention, reuse, and recycling.

    b) New EfW capacity is capable of resulting in overcapacity of EfW waste treatment provision at a local and/or national level.

    c) New EfW capacity may be incompatible with long term recycling targets.

    d) New EfW capacity may be of an inappropriate type or scale that could prejudice achievement of local or national waste management targets.

    e) Account needs to be taken not only of operational EfW capacity and capacity that is under construction, but also capacity that is in development.

30. The latest Government policies in this respect reflect statements in Defra's December 2018 'Our Waste, Our Resources: A Strategy for England', such as the statements on page 60 that: "…valuable recyclable material is being lost to landfill or incineration…", and on page 137 that: "Residual waste is the mixed material that is typically incinerated for energy recovery or landfilled. Much of the products and materials contained in this waste could have been prevented, reused or recycled. This is inefficient not only because materials that hold value are being lost, but also incineration and landfill are the most expensive ways to treat waste".

31. Within the context of the assessment of whether or not EfW overcapacity exists or would exist were planning permission granted to new EfW capacity, EN-1 makes it clear that the target to reduce residual waste needs to be considered, noting at paragraph 4.16.10 that the decision-maker: "…must also consider duties under other legislation including duties under the Environment Act 2021 in relation to environmental targets and the Government's Environmental Improvement Plan 2023".

32. As such, it is notable that the 2018 Resources and Waste Strategy pre-dates the adoption of the statutory residual waste reduction target as set out in the Environmental Targets (Residual Waste) (England) Regulations 2022 (which places a legal duty on the Secretary of State to ensure that by 31 December 2042 the total mass of residual waste for the calendar year 2042 does not exceed 287 kilograms per head of population in England, a 50% reduction from 2019 levels), and pre-dates the Environmental Improvement Plan (which includes various interim waste reduction targets).

33. UKWIN's evidence to the Examination shows that when the achievement of those targets is taken into account there is already more incineration capacity that is operational or under construction, even before the additional EfW capacity in development is taken into account, than we will have genuinely residual waste available for use as incinerator feedstock.

EfW incineration capacity data held by UKWIN

34. In the May 2023 Statement of Common Ground (SoCG) between UKWIN and the Applicant [REP9-029] UKWIN agreed with the Applicant that at that time:

    a) 15,649kte was a reasonable estimate of the permitted capacity of currently operational municipal waste incinerators in England; and

    b) 4,727kte was a reasonable estimate of the permitted capacity of municipal waste incinerators currently under construction in England.

35. Further to the evidence submitted to the Examination to date, UKWIN has additional data regarding the latest capacity status for EfW plants across England, showing that the total permitted capacity for plants operational and under construction has increased by 1,139kte, from 20,376kte in May 2023 (i.e. 15,649kte + 4,727kte) to 21,515kte (i.e. 16,889kte + 4,626kte).

36. This data therefore shows that the level of EfW overcapacity has worsened since the close of the North Lincolnshire NSIP Examination.

37. As noted above, as per EN-3 paragraph 2.7.44, in addition to capacity that is operational and under construction, it is also important to consider capacity that is in development.

38. While it remains the case that, as per the position set out in the SoCG, "9,097kte is a reasonable estimate of consented EfW projects which are considered to still be under development", it should be noted that according to our data the current level of capacity in development is slightly higher.

39. With respect to England, our data shows that there is currently more than 35.5 million tonnes of operational and potential incineration capacity as follows:

    a) 21,515,256 tpa of existing capacity, of which 16,889,036 tpa is operational and 4,626,220 tpa is currently under construction;

    b) 10,890,279 tpa of additional capacity is currently in active development that benefits from planning permission, of which 6,241,279 tpa of capacity also benefits from having secured an environmental permit, and 4,649,000 tpa has yet to secure an environmental permit;

    c) 1,068,369 tpa of additional capacity is currently in active development where an application has been made for planning permission (of which 760,000 tonnes relates to the North Lincolnshire NSIP proposal);

d) 1,664,915 tpa of additional capacity that has secured planning permission but where the development status is uncertain or stalled (excluding projects known to have been abandoned); and

e) 380,000 tpa of additional capacity which was refused planning permission by a local authority but is within the 6 month appeal period (of which 230,000 tpa relates to Swadlincote and 150,000 tpa relates to Archers Fields).

40. As such, the latest data supports the conclusions that were set out in REP6-043 that found EfW overcapacity at local, sub-national, and national levels.

41. These latest figures also support the conclusions from UKWIN's critiques of the Applicant's post-examination claims about need for the facility, which are set out in UKWIN's January 2024 submissions (Comments on Document 9.46 and Response to request for information set out in the 8 December 2023 SoS letter).

RESOURCES AND WASTE STRATEGY MONITORING PROGRESS REPORT (MAY 2024) AND PERMIT MORATORIUM

42. The Applicant's letter makes assumptions based on ***"the time that Defra lifted its Direction to pause the determination"*** being around the time of the publication of the Resources and Waste Strategy Monitoring Progress report.

43. The moratorium was temporary and was designed to automatically expire unless renewed by 24 May 2024.

44. The UK Government called a General Election on 22 May 2024, and as such it would be reasonable to conclude that the reason the moratorium was not extended was due to sensitivity around making significant decisions around the pre-election period.

45. According to an ENDS report from 28 May 2024: "[the] calling of [a] surprise election appears to have pushed the government to end the temporary moratorium".

46. The Applicant's interpretation of the lack of renewal of the permit moratorium as being based on the Defra Monitoring Progress report from May 2024 is at odds with the Conservative Party's decision to subsequently include a moratorium in their Election Manifesto on 11 June, stating: "We will prevent new waste incinerators being built, including those with recent permit approvals, revoking those where substantial construction has not taken place. This recognises the impact on local communities and that increased recycling rates will reduce the need for incineration capacity in the longer term".

47. We also note that when UKWIN requested a copy of the work carried out by Defra during the permit moratorium, Defra responded on the 17th of June saying: "…the piece of work requested is still in a draft format and subject to further adjustments before it is finalised and signed off. Once complete there is an intention to publish this information. However, the pre-election period commenced on 25 May 2024 and the decision to publish or not will now rest with ministers after the election...".

48. No mention was made in that Defra response that the work had been superseded by the Defra monitoring report, and instead Defra explained how the delay to publication of the work was attributed to the pre-election period.

49. Even when one sets aside election 'purdah' issues and subsequent statements from the former Government, a consideration of the actual content of the Defra Resources and Waste Strategy Monitoring Progress report makes clear that this document is hardly one that could credibly have resulted in any sort of conclusion that significantly more EfW capacity was needed.

Content of the Defra's Resources and Waste Strategy monitoring report

50. The Applicant states:

"…the monitoring report contains the latest data on energy from waste capacity as well as tracking progress on both recycling, landfill and food waste targets. It does note that the reduction in landfill has slowed and will need to accelerate to meet the 2030 target, but makes no comment on the amount of energy from waste capacity being an issue."

51. Contrary to the Applicant's claim, Defra's Resources and Waste Strategy Monitoring Progress report does not provide data on Energy from Waste capacity. Instead, it provides information about how much local authority collected waste was treated via incineration up to 2020/21 (figures 2.3 and 2.4) and residual waste treatment per person by treatment method up to 2022 (Figure 3.1 and Table 3.1), which would not have taken account of EfW incineration plants that were not operational by that point.

52. It also should be noted that assessing overcapacity requires a consideration not only of waste capacity but also of the anticipated future waste arisings. Defra's Resources and Waste Strategy Monitoring Progress report does not include any quantitative assessment of how much residual waste will be available for incineration in the future.

53. Given the lack of data on either current capacity or future demand, it is not surprising that the Monitoring Progress report does not comment on the issue of EfW overcapacity.

54. It is worth noting that the Monitoring Progress report does include a statement about how EfW should be minimised and how the quantity of waste sent to EfW ought to fall as we move towards a circular economy.

55. On page 27 the Defra Monitoring Progress report notes that: “Recovering energy from and disposing of waste are the last resort for waste that is not recycled. This includes landfill and incineration (with or without energy recovery, as well as combustion), which are associated with higher carbon emissions than most other waste management methods and permanently remove the waste from the economy. This necessitates more material extraction if the products are to be replaced (though incineration can be used to produce energy in an energy-from-waste (EfW) plant and metals can be extracted from incinerator bottom ash). A circular economy would minimise the amount of waste sent for final disposal by extending the life of products and recycling them to substitute for virgin materials.”

56. Defra’s statement that “A circular economy would minimise the amount of waste sent for final disposal” (to landfill or EfW) is a far cry from saying that more EfW capacity is needed, and Defra’s statement about the need to divert waste from both incineration and landfill instead provides one reason why the UK Government wishes to avoid EfW overcapacity.

57. As such, to the extent that the Monitoring Progress report is intended to reflect Defra’s position, it reinforces the need to guard against EfW overcapacity and the need to take account of anticipated future reductions in residual waste arisings.

Relevance of Portland Port and other decisions

58. Whilst the Applicant refers to a ***“number of planning, DCO and permit decisions”*** the only planning or DCO decision they named is Portland Port.

59. We are not aware of any relevant DCO decisions having been made subsequent to the permit moratorium having been lifted, and the only planning approval relating to the treatment of municipal waste of which we are aware is Portland Port.

60. In relation to Portland Port, it should be noted that:

    a) The Portland Port proposal’s headline capacity of 200,000 tpa is far smaller than the 760,000 tonnes of annual capacity proposed for Flixorough. This means the two schemes are of an entirely different scale, with only the North Lincolnshire proposal qualifying as Nationally Significant Infrastructure.

    b) The Inspector and Secretary of State’s assessment of need for Portland was based on a consideration of need identified in the Dorset Local Plan, which in turn was based on principles associated with the

standard, non-NSIP, planning regime. In that case it was deemed that the proposed new EfW capacity was justified on the basis that it would meet an identified local need. No explicit consideration was given by the Portland Port decision makers to the impact of meeting national residual waste reduction targets or to the issue of national EfW overcapacity.

c) In contrast to the Portland Port proposal, NSIP proposals need to be assessed against EN-1 and EN-3 which specifically require a consideration about avoiding EfW overcapacity at a local and national levels.

d) UKWIN understands that the Portland Port decision is currently subject to a legal challenge, which raises further doubts with respect to relying on that decision for guidance in relation to the North Lincolnshire NSIP proposal.

61. As such, we see no reasonable basis for the Applicant to complain about inconsistent behaviour and no barrier to the North Lincolnshire proposal being refused due to conflict with EN-1 and EN-3 policies relating to the need to avoid local and/or national EfW overcapacity.

APPENDIX: INCINERATION CAPACITY

TABLE 1. SUMMARY OF ENGLISH EFW PLANT CAPACITY DATA

Project and planning status	Total	Breakdown of total by permit status			
		Applied for a permit	Draft permit	Granted permit	Yet to apply for a permit
Operational	**16,889,036**	91,274		16,792,062	5,700
Under construction	**4,626,220**			4,626,220	
Planning consented (in development)	**10,890,279**	1,911,000	200,000	6,241,279	2,538,000
Planning consented (uncertain / stalled)	**1,664,915**			714,915	950,000
Planning application submitted	**1,068,369**	260,000			808,369
Pending appeal from planning refusal	**380,000**	230,000			150,000
Grand Total	**35,518,819**	**2,492,274**	**200,000**	**28,374,476**	**4,452,069**

TABLE 2. BREAKDOWN OF EFW PLANT CAPACITY DATA

Existing			
Operational	16,889,036		
Under construction	4,626,220		
TOTAL EXISTING		**21,515,256**	
In Development (with planning permission)			
Has environmental permit	6,241,279		
Does not yet have environmental permit	4,649,000		
TOTAL IN DEVELOPMENT		**10,890,279**	
TOTAL EXISTING AND IN DEVELOPMENT			**32,405,535**
Planning application submitted	**1,068,369**		
SUB-TOTAL		**33,473,904**	
Planning consented (uncertain / stalled)	**1,664,915**		
Pending appeal from planning refusal	**380,000**		
GRAND TOTAL			**35,518,819**

TABLE 3. LIST OF ENGLISH EFW INCINERATION PLANTS

EfW Plants	Location	Region	Capacity (tpa)	Development status	Planning Status	Permit status
Bilsthorpe	Nottinghamshire	East Midlands	200,000	Uncertain / Stalled	Consented	Granted
Boston BAEF (NSIP)	Boston	East Midlands	1,200,000	Yet to enter construction	Consented	Yet to apply
Boston Energy Production Facility	Boston	East Midlands	86,400	Operational	Consented	Granted
Corby Brookfield	Northamptonshire	East Midlands	154,000	Yet to enter construction	Consented	Yet to apply
Corby Energy Recovery Centre (Shelton Road)	Northamptonshire	East Midlands	357,000	Yet to enter construction	Consented	Granted
Drakelow	Derbyshire	East Midlands	169,000	In Construction	Consented	Granted
East Midlands Energy Re-Generation (EMERGE) Centre	Nottinghamshire	East Midlands	524,500	Yet to enter construction	Consented	Granted
Eastcroft (Nottingham)	Nottingham	East Midlands	200,000	Operational	Consented	Granted
Eastcroft (Nottingham) (3rd Line)	Nottingham	East Midlands	100,000	Yet to enter construction	Consented	Granted
Lincolnshire (North Hykeham)	Lincolnshire	East Midlands	190,000	Operational	Consented	Granted
Newhurst Quarry	Leicestershire	East Midlands	455,000	Operational	Consented	Granted
Shireoaks Road, Worksop	Nottinghamshire	East Midlands	24,369	Yet to enter construction	Applied	Yet to apply
Swadlincote	Derbyshire	East Midlands	230,000	Yet to enter construction	Refused - Pending appeal	Applied
Beccles	Suffolk	Eastern	24,369	Yet to enter construction	Consented	Granted
Great Blakenham	Suffolk	Eastern	295,000	Operational	Consented	Granted
Hoddesdon (Ratty's Lane)	Hertfordshire	Eastern	112,915	Uncertain / Stalled	Consented	Granted
Medworth (NSIP)	Cambridgeshire	Eastern	625,000	Yet to enter construction	Consented	Granted
Peterborough (Fourth Drove)	Cambridgeshire	Eastern	110,000	Operational	Consented	Granted
Peterborough (Storeys Bar Road)	Cambridgeshire	Eastern	650,000	Uncertain / Stalled	Consented	Yet to apply
Rivenhall	Essex	Eastern	595,000	In Construction	Consented	Granted
Rookery Pit	Bedfordshire	Eastern	585,000	Operational	Consented	Granted
Tilbury Docks - Phase 2	Essex	Eastern	379,658	Yet to enter construction	Consented	Granted
Beddington	South London	London	347,422	Operational	Consented	Granted
Beddington (permitted capacity increase)	South London	London	34,864	Operational	Consented	Applied
Cory Riverside 1	South East London	London	850,000	Operational	Consented	Granted

EfW Plants	Location	Region	Capacity (tpa)	Development status	Planning Status	Permit status
Cory Riverside 2	South East London	London	805,920	In Construction	Consented	Granted
Edmonton (additional)	North London	London	250,000	In Construction	Consented	Granted
Edmonton (current)	North London	London	500,000	Operational	Consented	Granted
SELCHP	South East London	London	464,000	Operational	Consented	Granted
Billingham Reach	Teesside	North East	375,000	Yet to enter construction	Consented	Granted
Graythorp (Hartlepool)	Hartlepool	North East	650,000	Yet to enter construction	Consented	Applied
Haverton Hill (New Road, Billingham) (EQTec)	Teesside	North East	170,000	Uncertain / Stalled	Consented	Yet to apply
Port Clarence	Teesside	North East	333,000	In Construction	Consented	Granted
Redcar	Redcar and Cleveland	North East	450,000	Yet to enter construction	Consented	Applied
Tees Valley (Grangetown)	Redcar and Cleveland	North East	512,000	Yet to enter construction	Consented	Granted
Tees Valley Lines 1-6 (Billingham)	Teesside	North East	756,000	Operational	Consented	Granted
Teesside	Stockton on Tees	North East	240,000	Yet to enter construction	Consented	Yet to apply
Wilton 11	Teesside	North East	500,000	Operational	Consented	Granted
Bolton	Greater Manchester	North West	127,100	Operational	Consented	Granted
Hooton Bio Power	Merseyside	North West	266,000	Operational	Consented	Granted
Ince Marshes (Protos)	Cheshire	North West	500,000	**In Construction**	Consented	Granted
Kingmoor (Carlisle)	Cumbria	North West	274,000	Yet to enter construction	Consented	Granted
Lostock	Cheshire	North West	685,000	In Construction	Consented	Granted
Preston (Longridge Road)	Lancashire	North West	395,000	Yet to enter construction	Consented	Yet to apply
Rockcliffe	Carlisle	North West	24,000	Yet to enter construction	Applied	Yet to apply
Runcorn	Cheshire	North West	1,100,000	Operational	Consented	Granted
Allington	Kent	South East	560,000	Operational	Consented	Granted
Archers Fields	Essex	South East	150,000	Yet to enter construction	Refused - Pending appeal	Yet to apply
Ardley	Oxfordshire	South East	378,000	Operational	Consented	Granted
Greatmoor	Buckinghamshire	South East	345,000	Operational	Consented	Granted
Horsham	West Sussex	South East	230,000	Yet to enter construction	Consented	Granted
Integra North (Chineham)	Hampshire	South East	110,000	Operational	Consented	Granted

EfW Plants	Location	Region	Capacity (tpa)	Development status	Planning Status	Permit status
Integra South East (Portsmouth)	Hampshire	South East	220,000	Operational	Consented	Granted
Integra South West (Marchwood)	Hampshire	South East	220,000	Operational	Consented	Granted
Isle of Wight	Isle of Wight	South East	44,000	Operational	Consented	Granted
Kemsley K3	Kent	South East	657,000	Operational	Consented	Granted
Lakeside (Slough)	Berkshire	South East	468,280	Operational	Consented	Granted
MedwayOne Energy Hub	Kent	South East	606,000	Yet to enter construction	Consented	Applied
Milton Keynes	Milton Keynes	South East	94,000	Operational	Consented	Granted
Newhaven	East Sussex	South East	242,000	Operational	Consented	Granted
Reading	West Berkshire	South East	150,000	Yet to enter construction	Consented	Yet to apply
Shepperton	Surrey	South East	55,460	Operational	Consented	Granted
Shepperton (Permitted capacity increase)	Surrey	South East	5,860	Operational	Consented	Applied
Slough Multifuel	Berkshire	South East	480,000	Operational	Consented	Granted
Avonmouth (Bristol)	Bristol	South West	376,500	Operational	Consented	Granted
Avonmouth (Bristol) (Permtited capacity increase)	Bristol	South West	50,550	Operational	Consented	Applied
Bridgwater	Somerset	South West	122,640	Yet to enter construction	Consented	Granted
Canford	Dorset	South West	260,000	Yet to enter construction	Applied	Applied
Devonport (Plymouth)	Devon	South West	265,000	Operational	Consented	Granted
Hill Barton (Exeter)	Devon	South West	87,000	Uncertain / Stalled	Consented	Granted
Javelin Park	Gloucestershire	South West	190,000	Operational	Consented	Granted
Marsh Barton (Exeter)	Devon	South West	60,000	Operational	Consented	Granted
Marsh Barton (Exeter) (Permtited capacity increase)	Devon	South West	5,700	Operational	Consented	Yet to apply
Northacre (Westbury)	Wiltshire	South West	243,000	Yet to enter construction	Consented	Granted
Parley	Dorset	South West	50,000	Yet to enter construction	Consented	Yet to apply
Plymouth EfW Facility	Roborough, Plymouth	South West	60,000	Yet to enter construction	Consented	Applied
Portland Port	Dorset	South West	200,000	Yet to enter construction	Consented	Draft
Severnside (Avonmouth)	South Gloucestershire	South West	467,000	Operational	Consented	Granted
St Dennis (Cornwall)	Cornwall	South West	240,000	Operational	Consented	Granted
Baddesley	Warwickshire	West Midlands	130,000	Operational	Consented	Granted

EfW Plants	Location	Region	Capacity (tpa)	Development status	Planning Status	Permit status
Battlefield (Shrewsbury)	Shropshire	West Midlands	102,000	Operational	Consented	Granted
Coventry	West Midlands Met Districts	West Midlands	315,000	Operational	Consented	Granted
Dudley	West Midlands Met Districts	West Midlands	105,000	Operational	Consented	Granted
Four Ashes	Staffordshire	West Midlands	340,000	Operational	Consented	Granted
Hartlebury (EnviRecover)	Worcestershire	West Midlands	230,000	Operational	Consented	Granted
Kelvin (West Bromwich)	Sandwell	West Midlands	400,000	In Construction	Consented	Granted
Kidderminster	Worcestershire	West Midlands	75,000	Yet to enter construction	Consented	Yet to apply
Stoke (Hanford)	Stoke on Trent	West Midlands	210,000	Operational	Consented	Granted
Tyseley (Birmingham)	West Midlands Met Districts	West Midlands	440,500	Operational	Consented	Granted
WandE (Walsall)	Walsall	West Midlands	478,300	In Construction	Consented	Granted
Wolverhampton	West Midlands Met Districts	West Midlands	118,000	Operational	Consented	Granted
Allerton	North Yorkshire	Yorks. & Humber	320,000	Operational	Consented	Granted
Alpha Grimsby	North East Lincolnshire	Yorks. & Humber	226,000	Yet to enter construction	Consented	Yet to apply
Energy Works (Hull)	Hull	Yorks. & Humber	315,000	Uncertain / Stalled	Consented	Granted
Ferrybridge Multifuel 1 (FM1)	West Yorkshire	Yorks. & Humber	725,000	Operational	Consented	Granted
Ferrybridge Multifuel 2 (FM2)	West Yorkshire	Yorks. & Humber	725,000	Operational	Consented	Granted
Hull Energy Production Facility (Aviva)	Hull	Yorks. & Humber	86,400	Operational	Consented	Granted
Keighley	West Yorkshire	Yorks. & Humber	148,000	Yet to enter construction	Consented	Granted
Kirk Sandall (Doncaster)	Doncaster	Yorks. & Humber	426,612	Yet to enter construction	Consented	Granted
Kirklees (Huddersfield)	West Yorkshire	Yorks. & Humber	150,000	Operational	Consented	Granted
Knapton	North Yorkshire	Yorks. & Humber	130,000	Uncertain / Stalled	Consented	Yet to apply

EfW Plants	Location	Region	Capacity (tpa)	Development status	Planning Status	Permit status
Leeds (Cross Green)	West Yorkshire	Yorks. & Humber	190,000	Operational	Consented	Granted
Leeds (Skelton Grange)	West Yorkshire	Yorks. & Humber	410,000	In Construction	Consented	Granted
Little Houghton	South Yorkshire	Yorks. & Humber	145,000	Yet to enter construction	Consented	Applied
Newlincs	North Lincolnshire	Yorks. & Humber	56,000	Operational	Consented	Granted
North Beck (Immingham)	North East Lincolnshire	Yorks. & Humber	676,000	Yet to enter construction	Consented	Granted
North Lincolnshire (NSIP)	North Lincolnshire	Yorks. & Humber	760,000	Yet to enter construction	Applied	Yet to apply
Sheffield	South Yorkshire	Yorks. & Humber	245,000	Operational	Consented	Granted
South Humber Bank (Stallingborough)	North East Lincolnshire	Yorks. & Humber	753,500	Yet to enter construction	Consented	Granted
Southmoor (Knottingley)	North Yorkshire	Yorks. & Humber	350,000	Yet to enter construction	Consented	Granted
Knowsthorpe Way	Leeds	Yorks. & Humber	24,000	Yet to enter construction	Consented	Yet to apply
Bramford Road (Great Blakenham)	Suffolk	Eastern	24,000	Yet to enter construction	Consented	Yet to apply