

The Need for the Proposed Development

- 2.24 Paragraph 2.5.70 of NPS EN-3 makes it clear that the Secretary of State must be satisfied, with reference to the relevant waste strategies and plans, that the proposed 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.
- 2.25 The information in the PEIR relates solely to the need for energy and does not include sufficient information on the extent to which the generating station and capacity proposed contributes to the recovery targets set out in the relevant strategies and plans, taking into account existing capacity.
- 2.26 It is noted that information on the need case included in the consultation newsletter suggests there is circa 900,000 tonnes of residual waste within an approximate two-hour journey time of the Harewood site. Bearing in mind that the PEIR makes it clear that the waste catchment excludes Sussex, Essex, East London and Kent, a significant part of which would be within a two-hour drive time, it is unclear how much residual waste there would be remaining. Further information is required on the waste catchment as well as the existing and future capacity (i.e. through consented but not yet implemented schemes) in that catchment and a detailed explanation is required as to how the quantum of residual waste has been calculated broken down on a county basis
- 2.27 At the Stage 1 consultation, it was made clear that the facility was intended to deal with commercial and industrial (C&I) waste and not municipal solid waste (MSW). It is noted now that the PEIR refers to both C&I waste and MSW. Clarification is required on what proportion of the residual 900,000 tonnes is assumed to be MSW.
- 2.28 Much is made of the need for energy as set out in the NPS, yet the proposal as it stands will not make any contribution towards meeting energy needs without a connection to the grid. It is disingenuous to pray in aid the NPS to justify the scheme but then not seek consent for the grid connection which would allow that need to be met.