

## Powerfuel Appeal

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**From:** Shlomo Downen <[REDACTED]>  
**Sent:** 14 December 2023 17:07  
**To:** Skinner, Helen  
**Subject:** A list of references for the evidence in UKWIN's IP Presentation to the Dorset Appeal (PINS Ref 3327692)

Dear Helen,

At the Dorset Appeal inquiry (PINS Ref APP/D1265/W/23/3327692) today the Appellant stated that they believed that some of the evidence we provided constituted new evidence and stated that they would be producing a note on this new evidence.

To assist the inquiry, we set out below the primary sources of the statements made in our presentation (from our written evidence and from other inquiry documents).

- **Slide 3 - UKWIN's Climate Case**
  - Examples can be found at paragraphs 26-27 (Consett) and paragraphs 28-31 of UKWIN's October 2023 IP submission.
- **Slide 4 - Alternative fate of feedstock**
  - UKWIN's October 2023 IP submission. paragraphs 204, 240 and 241
  - Further related evidence about how incineration harms recycling includes:
    - a) UKWIN's October 2023 Interested Party submission (principally paragraphs 237-259);
    - b) UKWIN's Incineration Overcapacity Technical Annex [CD12.65] (principally pages 12-14); and
    - c) UKWIN's Good Practice Guidance [CD12.64] (pages 66-69).
- **Slide 5 - Displaced Electricity**
  - UKWIN's November Supplementary Climate Submission - COMMENTS ON REVISED CARBON ASSESSMENT - page 6
- **Slide 6 - Landfill Gas Capture Rate**
  - UKWIN's November Supplementary Climate Submission - COMMENTS ON REVISED CARBON ASSESSMENT - page 7
  - UKWIN's November Supplementary Climate Submission - COMMENTS ON REVISED CARBON ASSESSMENT - paragraphs 31-32 explain the 72% figure.
- **Slide 7 - Biogenic / Biocarbon %**
  - UKWIN's November Supplementary Climate Submission - COMMENTS ON REVISED CARBON ASSESSMENT - page 9
  - UKWIN's November Climate Rebuttal - COMMENTS ON STEPHEN OTHER'S CLIMATE PROOF - paragraphs 52-58
- **Slide 8 - Credit for Carbon Sequestration**
  - UKWIN's November Supplementary Climate Submission - COMMENTS ON REVISED CARBON ASSESSMENT – page 10;
  - CD12.64 (Good Practice Guidance) – internal pages 19 - 42
- **Slide 9 - Credit for Carbon Sequestration**
  - UKWIN's November Climate Rebuttal - COMMENTS ON STEPHEN OTHER'S CLIMATE PROOF – Paragraphs 76 – 83,
- **Slide 10 - Credit for Carbon Sequestration (cont.)**
  - UKWIN's November Climate Rebuttal - COMMENTS ON STEPHEN OTHER'S CLIMATE PROOF – Paragraphs 76 and 86
- **Slide 11 - Commencement and duration**
  - UKWIN's October IP Submission - paragraphs 137 and 138 (references to permit)
  - UKWIN's Overcapacity Technical Annex (CD12.65) - page 9
  - Note relates to UKWIN COMMENTS ON REVISED CARBON ASSESSMENT - paragraphs 28 and 29
- **Slide 12 - Carbon Intensity**

- UKWIN COMMENTS ON REVISED CARBON ASSESSMENT - paragraphs 55-56
- **Slide 15 - Need to justify need: Policy context**
  - UKWIN IP Submission (October 2023) - paragraphs 210 and 212 – 216
  - UKWIN Comments on Nick Roberts' Planning Policy & Need / Benefits Proof - paragraphs 73-74
- **Slide 16 - Need to justify need: Policy statements**
  - UKWIN IP Submission (October 2023) - paragraphs 200 – 221.
  - UKWIN Comments on Nick Roberts' Planning Policy & Need / Benefits Proof - paragraphs 14 and 22
- **Slide 17 - Need to justify need: Policy statement (cont.)**
  - UKWIN IP Submission (October 2023) - paragraphs 200 – 221.
  - UKWIN Comments on Nick Roberts' Planning Policy & Need / Benefits Proof - paragraph 76(b) and paragraph 27 (which refers to CD9.9)
  - CD9.9 pages 60 and 137
- **Slide 18 - How ERF capacity can harm recycling**
  - UKWIN October IP Submission - paragraphs 252 – 259
  - UKWIN Comments on Nick Roberts' Planning Policy & Need / Benefits Proof - paragraphs 44 – 53
- **Slide 19 - Need to justify need: Alternative fate of the feedstock**
  - UKWIN Overcapacity Briefing - page 6
- **Slide 20 - Incineration capacity across England**
  - UKWIN Overcapacity Briefing - page 2
- **Slide 21 - National ERF overcapacity: Diminishing feedstock**
  - UKWIN Overcapacity Briefing - page 1
  - UKWIN Overcapacity Technical Annex (CD12.65) - page 9
- **Slide 22 - Incineration overcapacity in England**
  - UKWIN Overcapacity Briefing - pages 1 and 2
- **Slide 23 - Incineration overcapacity in Western cluster**
  - UKWIN's October 2023 IP Submission - page 36, including paragraphs 234 and 235.
- **Slide 24 - More locally...**
  - UKWIN Comments on Nick Roberts' Planning Policy & Need / Benefits Proof - paragraphs 77 – 79 re: Roberts PPF1
- **Slide 25 - Need conclusions**
  - CD12.83 & CD84 (and evidence set out above re: lack of need)

Once again, we appreciate you sharing this with the Inspector and all relevant parties.

Kind regards and best wishes,  
Shlomo and Josh  
UKWIN