

There is no need for the MVV Medworth incinerator to be built.

My name is Alan Wheeldon, a scientist and resident of Wisbech for 8 years. (Ref. no. 20032437). I am also a member of WisWin the anti-incinerator group.

Recent (1) and impending legislation (2) negates the need for a 650,000 tonne capacity incinerator in this region as proposed by MVV. (3) as this legislation will dramatically reduce the amount of municipal waste available to burn.

The environment act 2021 (1) legislates that all food and green waste has to be removed from all municipal waste from 2025 onwards. This would reduce burnable waste by up to 30.3% based on composition of household waste published by WRAP (4). In addition, the Environment act 2021 requires that manufacturers replace non recyclable packaging with recyclable material. This will boost recycling to over 50% with targets set to eventually reach 65% up from its current UK average of 44.4% (6). These are realistic and achievable targets. Wales which has already reached 56.5% recycling rates which has allowed a moratorium on new incinerators in that region.

Furthermore, new regulations (2) were approved on 30th January 2023, which reinforces this reduction with a revised waste target, to reduce residual waste on a kg per capita basis by 50% by 2042, from 2019 levels. This target was agreed following consultation with the Department for Environment, Food and Rural Affairs who advised that the total mass of residual waste by the calendar year 2042 does not exceed 287 kilograms per head of population in England, down from the 2019 level, of 574 kg per capita. This 50% reduction will be introduced for all residual Waste routes including,

(a) waste sent to landfill in the United Kingdom;

(b) waste put through incineration in the United Kingdom;

(c) waste used in energy recovery in the United Kingdom;

The need to propose a 650,000 tonne capacity incinerator by MVV in this region is questionable, as the company Cory Wheelabrator estimated that a much smaller incinerator of 268,000 tonne was all that was required to be

built just 10 miles away at Saddlebow, near King's Lynn (7). Their proposal for such an incinerator, 12 years ago, was subsequently rejected. Since then, recent legislation to reduce the amount of burnable waste currently going to landfill reduces the demand for incineration even more. Refusal of the Kings Lynn incinerator has required that MVV to increase the size of its application to a 650,000 tonne 50Mw project, not based on need, but so that the project becomes a NSIP and defers a decision to the Secretary of State and thus circumvent local planning departments.

All evidence point to an imminent reduction waste going to landfill and thus a reduction in available waste to burn. This is reflected in the projected overcapacity of incineration by 2042 of 14.7 million tonnes (5) with overcapacity occurring around 2030 just three years after the proposed MVV Medworth incinerator would be built (5).

Conclusion

There is no requirement for the MVV incinerator to be built as it will lead to further incinerator overcapacity.

- 1) Legislation.gov.uk The Environment Act 2021 Part 3 57
- 2) The Environmental Targets (Residual Waste) (England) Regulations 2023', the regulations as a Statutory Instrument came into force on 30 January 2023
- 3) National Infrastructure Planning. Medworth Energy from Waste Combined Heat and Power Facility. Ref. 010110
- 4) WRAP National Municipal Waste Composition, England 2017 3.1 Table 2
- 5) UkWin.org.uk UKWin Incineration Overcapacity Briefing 2022
- (6) Gov.uk UK Statistics on Waste 2022
- (7) UK Parliament Hansard Kings Lynn Incinerator vol 56 Jan 2013

Title:

The approval of the Boston energy from waste incinerator just 28 miles away would negate the need for the MVV waste incinerator in Wisbech due to incinerator overcapacity in this region.

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The Boston Energy from Waste incinerator:

Just 28 miles away, up the A17, plans have been submitted to build a One million tonne capacity, energy from waste facility at the port of Boston (1). The formal planning application was submitted on 20th April 2021 and a decision by the Secretary of State is due on 6th July this year, 2023. A validation report submitted by the Planning inspectorate on 10th March 2023 supports a Development Consent order being granted for this project subject to certain criteria being met. (6)

The port site was chosen as it allows the building materials for the Boston incinerators construction to be brought by sea and once operational the waste will also be brought in by sea from 12 other UK ports. By using ships, the Boston facility avoids the need for a large number of lorries on the roads, which dramatically reduces emissions from traffic and prevents congestion on the local roads surrounding the site and in Boston itself. The ash produced from burning the waste would also be transported away by ships.

The facility will include two carbon dioxide recovery plants which will capture some of the CO₂ and this will be used for a range of other industries. The Boston waste handling facility will create 300 new jobs. There are very few objections to an incinerator being built at Boston with no objections from the local MP or councillors.

Approval of the Boston facility with a 1 million tonne capacity would completely negate the need for a smaller facility just 28 miles away here in Wisbech.

The lack of need for another Incinerator in this area becomes even more apparent due to the recent introduction of the Environment Act 2021 (2). With the application of this act, it is anticipated that landfill and burnable waste will be considerably reduced going forward, as all food waste will be

collected separately which will immediately reduce burnable waste by 30% (7). Increased use of recyclable materials encouraged by the act will reduce burnable waste even further and boost recycling levels. This view is reinforced by new targets recently announced by the UK Government, to halve the amount of waste going to landfill or incineration in England by 2042 (3).

The reduction in waste available to burn means that there will be a projected incineration overcapacity of 14.7 million tonnes in England, with overcapacity occurring as early as 2030. (4).

With a projected incinerator overcapacity in mind, I would like to highlight that in the Government's September 2021 Draft National Policy Statement for Renewable Energy (EN-3) it states that any proposed incinerator, quote "must not result in over-capacity of EfW waste treatment at a national or local level."

Subsequent to this information, should the Planning Inspectorate question, that in the light of the large reduction in burnable waste going forward and with the superior Boston incinerator in an advanced stage of planning, that it will not be possible to guarantee to provide enough waste to burn, to be able to achieve the 50Mw of electricity that MVV are committed to generate, to make the MVV incinerator a Nationally Significant Infrastructure Project. Further due diligence is required by MVV for this project, as the evidence suggests that there is no requirement for the MVV incinerator to be built at all and another incinerator in this region is not in the national interest.

References

- 1) National Infrastructure Planning website. Boston Alternative Energy Facility (BAEF).
- 2) Legislation.gov.uk Environment act 2021Part 3.
- 3) The Environmental Targets (Residual Waste) (England) Regulations 2023', the regulations as a Statutory Instrument came into force on 30 January 2023.
- 4) UKwin.org.uk Incineration Overcapacity Briefing
- 5) 'Draft National Policy Statement for Renewable Energy Infrastructure (EN-3)' (September 2021) Dept of Business energy and industrial strategy.

(6) Boston Alternative Energy Facility Validation report ref. EN010095 March 2023.

7) WRAP National Municipal Waste Composition, England 2017 3.1 Table 2

Following contributions from the statutory and non-statutory authorities, local councils and local residents, I have read all the Relevant Representations and Written Representations posted on the National Infrastructure website for the Medworth Energy from Waste Combined Heat and Power facility, and I have attended several of the hearings and have read the transcripts of the hearings I did not attend. Subsequent to considering all this information I have compiled a synopsis of why a Development Consent Order should be refused for this project.

My view based on all the available evidence is that the adverse effects of this project would outweigh the benefits.

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The principal need for this development and its placement in Wisbech

Although the project would contribute 50MW of electricity to the electricity grid, the Applicant has not provided robust arguments to support the need for it to be located in Wisbech. This is especially relevant when waste will have to be transported from up to 167km away to keep it fed.

Following on from that, the Medworth incinerator would not satisfy the statement in paragraph 2.2.4 of NPS EN-1 that the planning system should provide a framework which permits the construction of the infrastructure needed in the place where it is acceptable in planning terms. It is important that, in doing this, the planning system ensures that development consent decisions take account of the views of affected communities and respect the principles of sustainable development. It is quite apparent that the objections to this project, with valid reasons, are overwhelming.

Furthermore, the Medworth incinerator would be in conflict with the National Planning Policy for Waste because it would put at risk the achievement of revised National recycling and composting targets as well as those cited in the Cambridgeshire County Council local plan for Waste.

The planning application for the Medworth Incinerator at Wisbech was not in accord with paragraph 2.5.70 of NPS EN-3 as it was not in compliance with Cambridgeshire County Councils Waste Local Plan and there was no evidence provided by the applicant as to why an exception should be made.

Waste Hierarchy and Fuel Availability.

The ways that the waste hierarchy (a set of priorities for making efficient use of resources) and fuel availability apply to the Medworth Incinerator, should be a key issues in the assessment of the development consent application for this project. The National Policy Statements set out that energy from waste is a type of infrastructure that is needed, however, the National Policy Statement for Renewable Energy Infrastructure, NPS EN-3 states that an Applicant for development consent must assess “the conformity with the waste hierarchy and the effect on relevant waste plans.....”.

NPS EN-3, notes that the decision-maker should 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. There are a number of national and local policies and plans that come into play in considering such applications. The policies within the Cambridgeshire County Council Waste Local Plan state that, in order to deliver sustainable waste management solutions proposals for waste management must demonstrate how waste is being driven to ascend

the waste hierarchy. The Planning application for the Medworth waste incinerator does not do that. The project would be counter to the waste hierarchy in diverting waste from more sustainable solutions such as preparation for re-use and recycling.

Furthermore, subsequent to recent legislation to reduce waste for landfill and therefore available to burn, existing waste disposal capacity is sufficient to deal with capacity demand and additional waste capacity was not required or expected during the existing contract period.

The Applicant's consideration of waste capacities and sourcing of its fuel supplies from a number of local authority areas up to 167km away would therefore not be required.

Traffic and Transport

Further to the above and relevant to the collection of large volumes of waste from such a wide radius, the National Policy Statements acknowledge that traffic movements into and out of nationally significant infrastructure projects during its development life cycle can have a wide variety of impacts on the surrounding transport infrastructure. This is particularly relevant as the main route identified by the Applicant for over 300 lorry movements per day would be the A47 which is not dualled for more than 5km into and out of Wisbech and is already subject to considerable traffic jams especially during the holiday season as it is the main route used by many to the North and North East Norfolk coasts. It is worth noting that baseline data of traffic volumes were not taken during this period by the Applicant.

In addition, the applicants plan, to run steam lines down the old March to Wisbech rail line will threaten its reinstatement as a functioning part of the rail network that is currently being evaluated as a viable concern. The National Policy Statements also note that it is possible to mitigate all those traffic and transport impacts, but the Applicant has not satisfactorily provided mitigation to address any of these issues.

Air Quality

The National Policy Statements acknowledge that the construction, operation and decommissioning of energy infrastructure can lead to emissions to air which have the potential to adversely impact human health as well as protected habitats and species and the wider environment.

The Applicant's assessment of potential impacts from the operation of the Medworth incinerator was that the design of the facility, including the use of a 90-metre-tall emissions chimney would ensure that any pollutant concentrations would be adequately dispersed before they reached ground level. However this mitigation would become ineffective during periods of no wind and during times of precipitation which would result in toxic emissions falling on the residents of Wisbech all of who live within 3.5km from the incinerator site. The health impacts over a 40 year lifespan of the incinerator under these repeated conditions could be significant. No mitigation was proposed by the Applicant to deal with meteorological events where emission dispersal is negligible.

Greenhouse Gases and Climate Change

There are many National and Local policy and legislative provisions that address the need to reduce emissions of greenhouse gases. The Applicant assessed the likely significant effects resulting from the operation of the Medworth Incinerator resulting from greenhouse gas emissions and the resultant impact on climate change but set also set these against notional emissions figures for emissions from landfill disposal of waste and from conventional electricity generation which would be avoided. However in their assessments the Applicant failed to include the reduction in landfill

volumes based on recent legislation and also failed to consider legislation that will change the qualitative and quantitative nature of the methods used for generation of electricity, by removing fossil fuel generated electricity, which would be phased out in the coming years.

Furthermore, the Medworth incinerator is not particularly energy efficient as the Applicant has not secured any commitment by sufficient local industries to receive the steam generated, to better improve the incinerators Combined Heat and Power performance.

References

The Cambridgeshire and Peterborough Minerals and Waste Local management Plan July 2012

Overarching National Policy Statement for Energy (EN-1)

National Policy Statement for Renewable Energy Infrastructure (EN-3)

The Environmental Targets (Residual Waste) (England) Regulations 2023', the regulations as a Statutory Instrument came into force on 30 January 2023

Waste Management Plan for England 2021 gov.uk

SITING THE MVV INCINERATOR SO CLOSE TO WISBECH HOUSEHOLDS WILL RESULT IN SERIOUS LONG TERM NEGATIVE HEALTH AFFECTS TO THOUSANDS OF WISBECH RESIDENTS.

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SUMMARY

This written representation demonstrates that siting the MVV incinerator in Wisbech, within 3.5km of tens of thousands of its residents, will result in a serious increase in deaths and hospital admissions caused by chronic lung disease that is already highly prevalent in this area.

HEAVY METALS ARE RELEASED FROM INCINERATOR CHIMNEYS

It is unquestionable that toxic carcinogenic heavy metals are emitted from incinerator chimneys such as the one proposed by MVV, which is why the environment agency has to set limits for the levels of toxins emitted. The levels set are arbitrary and not based on any definitive scientific study to show that they are safe. The safest level for the release of toxins is zero, however this is unachievable by incinerator companies using current technology. Furthermore, incinerator companies such as MVV, cannot guarantee that those levels recommended by the environment agency are continually met, as levels of all toxic heavy metals are not continuously monitored on a daily basis, and in addition, will vary depending on the qualitative nature of the waste being burnt.

Levels of 50ug/cu metre of emissions are allowed by the Environment agency for Cadmium, Thallium and Mercury and 500ug/cu metre of emissions for Zinc, Chromium, Manganese, Antimony, Cobalt, Copper, Vanadium, Nickel, Arsenic, and Lead (3). However, the MVV incinerator will release approximately 20,000,000 cubic metres of toxic gas per year. Using the limits allowed by the environment agency this means that overall, around 10kg each of Antimony, Arsenic, Lead, Chromium, Cobalt, Copper, Manganese, Nickel and Vanadium will be released into the air we breathe plus on top of that 1kg each of Cadmium, Thallium and Mercury, over the incinerators 40 year lifespan. In total this equates to nearly 100kg total of all highly toxic heavy metals pumping out of the chimney to be breathed in by the local residents and to fall onto the surrounding farmland. Rapid and widespread dispersal cannot be guaranteed as it is reliant on wind speed, direction, and weather conditions at the time. Not surprisingly health studies have shown serious detrimental health effects and raised mortality in people living near incinerators.

CLINICAL PAPERS SHOWING INCREASED CANCER RATES IN PEOPLE LIVING NEAR INCINERATORS

P Elliott and his group, (1) carried out studies that looked at the incidence of cancer cases that occur in people living near incinerators in Great Britain. They looked at cancer rates in over 14 million people living within 7.5km radius, of 72 waste incinerators over 13 years. They found a highly significant increase in cancers of the

stomach, liver and lung that equate to an increase of 11,000 extra cancer deaths, in people living near those incinerators. Excess cancer rates were higher for those living within 3.5km than those living 7.5km from the incinerator showing that the incinerator was the cause.

Another study by E.G. Knox (2) looked at the patterns of cancer in 22,458 children in Great Britain and found that twice as many children had died of cancer, if they had lived within a 5km radius, of an incinerator, at some time before their death. Excess cancer deaths in these children had occurred during the operation phase of the incinerator but not around comparative landfill sites, providing strong evidence that the incinerator emissions had contributed to the children's deaths.

Incinerator companies ignore scientific publications such as this stating that these studies are old and not based on studies carried out more recently. However, report commissioned by the Greater London Authority (11) found that there have not been any relevant epidemiological studies on cancer published in the last 5 years.

Stating that modern well run incinerators do not constitute a health risk in the absence of any material data is highly flawed. Furthermore, to demonstrate the safety of incinerator emissions, incinerator companies refer to three recent irrelevant epidemiological studies from the UK which did not find an association between municipal waste incinerators in Great Britain and infant mortality, adverse pregnancy, birth or neonatal outcomes. However these studies are totally irrelevant in that they only cover a very short 9 months emission exposure time, the foetus cannot breathe in the emissions from an incinerator as it is protected inside the mother, and furthermore, the mothers placenta is designed to screen out toxins to protect it further.

The bottom line is that there are no recent studies to show that modern incinerators are totally safe, for the people living in close proximity to them. Furthermore, it is unlikely that inhaling toxic emissions, on a daily basis, over a period of 40 years, will not negatively impact on peoples health and previous studies suggest that those effects could be fatal for many people.

THE PROPOSED INCINERATOR SITE IS FAR TOO CLOSE TO THE MAJORITY OF WISBECH RESIDENCIES

Wisbech is a small market town. Over 95% of the total population of 33,933 people (4) who reside within the Parish boundary, live within just 3.5km of the incinerator site. This is far too close and will result in the majority of residents breathing in toxic heavy metals on a daily basis, over the 40 year lifespan of the incinerator. Health indicators for Wisbech are already poor and will become considerably worse.

THE APPALLING HEALTH STATISTICS FOR WISBECH RESIDENTS

The life expectancy for Wisbech residents is three years less than for the county town of Cambridge. Rates of emergency admissions for heart disease, heart attack, and Chronic Obstructive Pulmonary Disease (COPD) for Wisbech are all over 50 per cent above national averages and for cancer incidence it is 10.6 per cent above the

national average. Premature mortality rates for those under 75 in Wisbech are 30.9 per cent higher than in the rest of England, and for those under 65 are 43.8 per cent higher (8).

RESPIRATORY DISEASE IS ALREADY A SERIOUS HEALTH ISSUE FOR WISBECH RESIDENTS

Clinical studies (10) show that Wisbech is statistically, significantly worse than the area covered by the Cambridge and Peterborough Clinical Commissioning group and the National average; for GP recorded prevalence of COPD, for the number of deaths with COPD as the primary cause of death in all ages, for the number of deaths with COPD as the primary cause of death in under 75's, for hospital admissions for all respiratory diseases, for emergency hospital admissions for all respiratory diseases, for the number of deaths with respiratory disease as the primary cause of death in under 75's and for the number of deaths with respiratory disease as the primary cause of death for all ages.

Siting the MVV incinerator in Wisbech, to burn 625,000 tonnes of waste per year, and the release of all emissions that will incur, based on previous evidence (1,2), will result in a significant increase in morbidity and mortality for the residents of Wisbech.

MVV ARE MISREPRESENTING THE FACTS

MVV's reassurance that their other incinerators such as the one based in Plymouth run without issue and are accepted by the local population ring hollow, when reports show that Plymouth's incinerator is causing the highest pollution levels ever recorded in a housing area (5).

Furthermore, to justify their plans, incinerator companies such as MVV keep misquoting Public Health England by stating that incinerators are safe (6), what Public Health England actually say is, 'While it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small.' (6.5)

Looking at the available evidence (1,2), effects are only small for those not living less than 3.5km from an incinerator. However as nearly the entire population of Wisbech live within 3.5km from the proposed MVV incinerator site, the evidence suggests that health effects for the residents of Wisbech will be made significantly worse and will almost certainly reduce many residents life expectancy. To compound the potential health risks, the largest school in Wisbech, the Thomas Clarkson Academy, with over 1200 pupils, sits just 1000 metres away from the incinerator site.

THE REASONS MVV CLAIM FOR SITING THE MVV INCINERATOR IN WISBECH ARE UNFOUNDED

The justification for siting the MVV incinerator so close to residencies does not hold up. The suggestion that it has to be close to other industries, so that the steam can be delivered has been rendered irrelevant, as recent correspondence from local

industries show that no-one wants to use this steam (7). In addition, siting the MVV incinerator so close to residences has required that, to feed the generated electricity into the national grid, will require a 3km long cable to be laid northwards, all the way to Walsoken, to join the nearest suitable power substation (9).

CONCLUSION

Supporting the case to site a massive incinerator such as this, so close to tens of thousands of residents, will almost certainly result in serious long term health implications and fatalities for the residents of Wisbech. Those supporting such a decision will have to take full responsibility in the future, when the predicted negative effects on many people's health, backed by current data, will prove to become a reality.

References

- (1) Elliott et al., Cancer incidence near municipal solid waste incinerators in Great Britain. Br J Cancer. 1996 Mar;73(5):702-10. doi: 10.1038/bjc.1996.122
- (2) Knox EG., Childhood cancers, birthplaces, incinerators and landfill sites. Int. J. Epidemiology, 2000. 29 (3) 391-397
- (3) Environment Permitting Guidance. The Waste Incineration Directive, For the Environmental permitting (England and Wales) Regulations 2010 Version 3.1. www.defra.gov.uk
- (4). 2016 statistics. ONS Mid-year population estimates, 2020.
- (5) Alanzi zero waste (AZWI) March 12 2023
- (6) Medworth energy from waste combined heat and power facility. Appendix 8A Chapter 8 Volume 6.4 Table 8A13 Stakeholder engagements and consultation comments on air quality.
- (6.5) PHE statement on the modern municipal waste incinerators (MWIs) study. gov.uk 15th October 2019.
- (7) WisWin archived correspondence. Available on request.
- (8) Growing Fenland Wisbech Town Masterplan 2023.
- (9) Medworth energy from waste combined heat and power facility. PINS ref. EN010110 Document Reference: Vol 7.2 Revision 1.0 June 2022.
- (10) Respiratory Diseases Profile Cambridgeshire and Peterborough Clinical commissioning Group July 2019.
- (11) Health Impacts associated with Energy-from Waste Incinerators 2019. S. Vardoulakis et al., Institute of Occupational Medicine, Edinburgh.