

**From:** [REDACTED]  
**To:** [Medworth](#)  
**Subject:** Examination documents submission EN010110  
**Date:** 15 March 2023 11:13:52

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Good morning!

I have attempted to make a submission to Mr Pinto on your website today. The 'select' button for deadline date does not work. I understood from the recent Hearings that those who did not speak at the Open Hearings could nevertheless submit their views by the 24th of March? I wanted to submit today so I will attach the document here. If there is something else I need to do, please do get in touch.

Many thanks,  
Dr U Waverley (IP 20032536)

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Planning Inspectorate

Mr A. Pinto

Examining Authority

MVV Medworth Incinerator EN010110

IP Ref. 20032536

Dear Mr Pinto,

### **Bad Faith DCO Application**

Thank you and your team for the professional Hearings on the MVV Incinerator which contrasted starkly with the deficient 'community consultations' organised by MVV. I am writing to share my view that this DCO Application is wholly unnecessary and is being made in **bad faith**.

### **I. 'CAPACITY'**

#### **Domestic and International Legal Obligations**

*The Secretary of State cannot award a DCO if to do so results in the Secretary of State being in breach of any duty imposed by or under any legislation.*

The House of Commons Library confirms that the UK Environment Act 2021 requires the Government to set legally binding environmental targets for England in four priority areas including air quality, as well as an additional target on fine particulate matter (PM2.5), as this is

considered to be the air pollutant of greatest harm to human health. MVV-Medworth cannot filter out all PM2.5 particulates or any smaller ultra-fine particulates. Nor can it identify or protect us (air, water, land and livelihoods) from additional harmful chemical alterations during combustion.

The DCO process appears to allow claims of **future production 'capacity'**, *ie.* 50mw electricity, without a mandatory component; and yet the project is allowed to bypass local planning on the basis of such claims. What are the penalties for failure, who checks and who pays? Does the process include investigation of operation, nuisance and pollution levels at existing MVV-UK plants (less than half the size of the proposed Medworth plant) – as partial evidence of competence and compliance? Does the award factor in timely and fair compensation and litigation? MVV's dodgy modelling and data manipulation do not inspire confidence.

The Climate Change Committee confirms that The Climate Change Act commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (**net zero**) by 2050 – about halfway through this incinerator's lifespan. **MVV-Medworth undermines UK government commitments to reduce Carbon Dioxide emissions:** since 1 tonne of waste incinerated produces 1 tonne of carbon dioxide, and the proposal excludes carbon capture, this MVV plant's capacity of 645,000 tonnes per year for 40 years will do nothing to help the UK reach its **legally binding Paris climate commitments and COP 26 targets**. A government decision in favour of MVV would be open to legal challenge, unnecessarily wasting taxpayers' money.

**Wisbech lacks the 'capacity' to sustain this plant.** There is insufficient waste, insufficient water, insufficient industrial customers for steam, insufficient skilled workers to benefit from proposed limited job creation, insufficient roads and inadequate road quality. Local roads cannot cope with the volume and weight of the proposed additional 350+ lorry journeys per day. Most are single lane, built on river banks and often sinking and - especially the A47 - are gridlocked most days. Lorries will shortcut through the town; our Grade I & II listed houses and buildings, with shallow foundations on high water tables, already shake under existing traffic loads. The A47 to Kings Lynn is the only direct route for ambulances and patients to the main Hospital there. The disruption of installing a Grid connection in this area will be immense. Two fire engines cannot provide sufficient emergency cover. To appreciate the SCALE of construction and operations proposed, it might be instructive to visit the Covanta Veolia Rookery South EfW facility at Green Ln, Stewartby, Bedford MK43 9LY as it offers similar capacity to the MVV Medworth proposal. Google offers many images of construction and site; of note is that the plant is not embedded next to residences, schools and an Eye hospital. (Bedford population 107,000 *vs.* Wisbech population 30,000.)

There is **incineration over-capacity in the UK: 53 energy-from-waste plants (EfW) are fully operational and three more have been commissioned.** Since 2014, the number of EfW incinerators in the country has more than doubled. Many more incinerators also continue to exist. But **Incineration is not taxed** so profitable proposals proliferate. MVV will undoubtedly also be claiming additional subsidies, milking the taxpayer to pollute our green and pleasant land. As MVV is a German company there is the possibility that waste from Germany and elsewhere in the EU could be imported to meet capacity, particularly as both the UK and the EU move away from incineration to cleaner, greener operations. Is this what Brexit means? Profits would also be repatriated to Mannheim, Germany which will profit

handsomely from the misery of the people of Wisbech and Fenland. Is this what 'levelling-up' means?

### **Democratic Capacity**

The DCO process does not favour everyday people who may not have easy online access, King's Counsels to represent them or time and expertise to read the reams of technical documents. MVV's documents are a lesson in obfuscation. **Views of elected representatives must of necessity be given more weight.**

MVV-Medworth is opposed by local people and businesses, local MPs and local councils at Parish, Town, District and County levels in Cambridgeshire and Norfolk. It is also opposed by WisWin, the Farmers Union and environmental organisations. The proposal cynically is **designed to by-pass local objections**; it is far too large (one of the largest in UK) for a small market town of 30,000 and it is **unnecessary**. An incinerator already exists at Peterborough 12 miles away. This incinerator would exacerbate problems of over-capacity of electricity supply: already the National Grid has to pay exorbitant sums to wind farms to shut down due to inadequate storage and distribution facilities. Perhaps MVV is hoping for lucrative compensation deals.

## **II. FOOD SECURITY VERSUS ENERGY SECURITY**

**The green-washing description as an energy-from-waste (EfW) facility attempts to hide the fundamental truth – that this is a dirty incinerator, still using landfill and emitting more CO2 than landfill and creating additional poisonous substances to ruin farmland and livelihoods, kill biodiversity and people.**

### **Contamination & Deleterious Health Impacts**

Two 95-7m (*ca.* 312 feet) chimneys - to disperse dioxins, heavy metals and unfiltered fine particulates - are flagged to reassure but fail completely. **What goes up must come down.** And these toxins will come down to contaminate the **category 1 prime agricultural land** producing most of the UK's grain, potatoes, soft fruit and vegetables, which would absorb these toxins and be rendered unsaleable. Some 80,000 jobs are linked to agriculture in the Fens and are in jeopardy if this polluting monstrosity is built. **This monstrosity could be sited elsewhere, whereas the prime agricultural lands of the Fens are a fixed irreplaceable resource.** The current fresh foods crisis highlights the **urgent need to protect this essential agricultural capacity in the national interest.**

MVV will contaminate The Wash Nature Reserve - the most important wetland site in the UK - and other bird, butterfly and wildlife sanctuaries. It will contaminate the River Nene and wildlife habitats. It will contaminate school playgrounds **750 metres** away, and town and leisure facilities. It will contaminate the very air we have to breathe. What is the point of

expanding ULEZ areas, **what are the lessons of Ella Kissi-Debra's air pollution death**, what is the point of reducing diesel emissions – if this poisonous monstrosity is built? What is the point of the Environment Act, the Environment Agency and Public Health England?

There are no UK statutory or recommended levels of dust deposition that constitute a statutory nuisance; nuisance findings rely on the judgment of the environmental health officer – if there is one available. This needs to change. MVV Dundee has recognised the **problem of DUST** during construction and operation:

*“... in periods of high winds the receptors affected by wind-blown dust could be areas further away... The deposition of dust outside of the site boundary is a potential source of statutory nuisance... dust can also have an impact on human health and local ecology....Potential dust sources during the construction phases of the development works are: Site clearance Ground excavation, piling and earthworks On site earth moving operations, site levelling, cut and fill etc. Vehicle movements over haul roads (especially unpaved) Vehicle movements on site during dry periods Re-suspension of particulates from construction vehicle movements on site, Wind blowing across the site during dry periods Stockpiling of excavated materials Cutting, grinding and drilling operations Accidental spillage and loss of load from vehicles carrying loose material Deep excavations Tipping Earthworks ... Dust which is raised by site operations may be carried to nearby residential areas and if present in sufficient quantities has the potential to cause a nuisance... The fine particles which comprise dust can become suspended and entrained in air and, as such they can disperse from a source. They will progressively fall out of the air stream;...Particulate dust emissions from construction works associated with the development have the potential to impact upon nearby premises, and site workers during the works. Dust which is raised by site operations may be carried to nearby residential areas, if present in sufficient quantities. Concerns have been raised by the inhalation of dust particles and the possible health effects this may have.”*

*“Where mud from a development site is allowed to spread onto local roads, it can form a secondary source of dust. The mechanical action of wheels on the road surface material will reduce the particle sizes by crushing and the potential for emission of dust from these roads can be quite high. As vehicles pass along the road, dust is re-suspended into the turbulent air stream both beneath and behind the vehicle and this can become entrained into a moving air flow.”*

This pollution on an even greater scale will be normal for the 4-5 years of construction and 350+ daily lorry deliveries thereafter. This dust, when combined with toxic emissions and poisonous particulates from their two chimneys during the **temperature inversions** that regularly affect Wisbech, will create a deadly toxic smothering blanket.

### **III. MR CAREY'S (MC) PERFORMANCE**

MVV intend to disrespect and disregard the community, the Planning Inspectorate and subsequently the Environment Agency, confident that the project will be 'too big to be allowed to fail'. This was clear from Mr Carey's (MC) performance at the Hearings where he refused to comply with your requests, did not answer questions and told outright untruths. As one example, MC mentioned that he/his company was very popular in Dundee and Plymouth, so Wisbech should fear not. Here are a few local headlines that give the lie to his claim:

Plymouth Herald - 'Plymouth's incinerator is causing the highest pollution levels ever recorded in a housing area.' 'Explosion heard as incinerator catches fire in late night drama.' 'Bad smell in Plymouth caused by 10.000 tons of rotting waste at incinerator.' 'Plymouth's incinerator was shut down after a steam blast makes it whistle in the night.' 'Warning of noise, smoke and steam jets as Plymouth incinerator comes on line.' 'Plymouth incinerator throws out thick steam as testing continues.' 'Plymouth incinerator is up and running again after 3 a.m. shutdown wakes residents.' 'Incinerator bosses deny that flying object filmed by resident came from its chimney.' 'Plymouth smell unacceptable says the environment agency.' 'Incinerator noise spoiled our kids weekend.' 'Big plumes of steam coming from Plymouth's incinerator.' 'Plymouth's incinerator shut down by undetected gas cylinder.' 'Plans for a second incinerator unveiled.'

**'Fire at Dundee incinerator hits efforts to rebuild public confidence.** *A major fire has put Dundee's...incinerator out of action and damaged efforts to gain public confidence in energy from waste. Meanwhile, a long-awaited report into pollution from the city's previous incinerator has found serious dioxin contamination at the site boundary.*

## Dubious Site Selection

MC, as chief salesman for MVV, declared that after the Kings Lynn incinerator was refused, there was no point in MVV trying again there, so they chose Wisbech – but evidence suggests that MVV conveniently **then** decided to enlarge the project to bypass council planning processes and community involvement.

1. MVV-UK have **no experience** in building and operating such a large plant; both Dundee and Plymouth are considerably smaller, at less than half the size of Medworth. Hence their original Medworth documents showed the plant with only ONE chimney; it gained the second chimney just recently. There is **no discernible improvement in MVV technology** utilised many years ago to build these smaller plants. They still cannot filter out all PM2.5 or ultrafine particulates. They will provide limited energy that is neither cheap nor green. This is **old, dirty, outdated technology** that is being discarded in the EU but instead is being dumped on the UK. Hence no mention of carbon capture. Has MVV's carbon capture expertise (not claims) been assessed? If they value their expertise in this and are aware of UK Government climate change commitments – **why is carbon capture not a central feature** of this application. To wait for the Government to request it suggests it will come with a hefty price tag as an **expensive 'optional extra' - if it is even within their capabilities.**
2. **Incoherent approach** to the proximity principle: they want to apply it, yet also want to waive it at will. They were banking (literally) on diverting Norfolk's rubbish from Bedford to Wisbech, but are now casting the net nationwide since Norfolk now opposes the Wisbech location. MVV want to attract rubbish (non-recyclable waste) from at least 200 miles away; their existing biomass EfW plant at MVV-Ridham is only 132 miles away. So why not expand those facilities on the same site to meet the supposed need? Existing incinerators in the 200 mile catchment will also be scrambling around for rubbish to fulfill their own contracts; **why does MVV unrealistically expect to divert already contracted waste?** The new Cory Riverside 2 EfW plant, additional to Cory 1 at Belvedere East London, is only 106 miles away and is the largest

EfW in the UK, so well placed to serve East Anglia and Wisbech. Veolia's EfW in Bedford is even nearer at 59 miles. Another mega incinerator awaits approval in Boston (pop. 66,450), only 28 miles away.

3. MC exhibited **dangerously inadequate local understanding** of the area. Despite identifying the site in 2010 and acquiring it in 2017, it escaped MC's notice that the site:
  - a. **contravenes W.H.O. & UK Gov/Public Health guidelines** by being within 3 miles of schools, town centre, listed buildings, Eye Hospital and residences;
  - b. is on a **floodplain and is flood risk category 3** - MVV only recently altered plant design to account for this floodplain hazard. MVV was unaware that their site is an old riverbed, that Wisbech is below sea level and the water table is very high. Previous major construction in the area, *eg.*, sewage works, repeatedly sank due to shifting silt. This probably accounts for sinking problems - particularly roads - continuing today in the selected area.
4. **It is alarming that a company preparing an application to build possibly the largest incinerator in the UK (and one of the largest in Europe) did not KNOW that it would need two chimneys – not one – as well as a raised platform and additional structural support for flood avoidance (Wisbech is below sea level on reclaimed peat land) which also raises the actual height of the two chimneys.**

#### 5. What else does MVV not know?

*Inter alia,*

- They do not know how much waste will be available, nor its source, nor for how long.
- They do not know how rubbish sorting will occur and what happens to unsuitable waste delivered – although MC has said they burn asbestos so perhaps to them everything is suitable.
- They do not know how to dispose safely of treatment waste water.
- They do not know how to cope with fire/explosion at the plant nor the subsequent contamination.
- They do not know how hazardous waste material - toxic bottom ash and fly ash - will be transported nor eventual storage destination...which should be special **secure transportation and secure landfill!**
- They did not know that Wisbech is subject to temperature inversions that will trap pollution and exacerbate hazardous effects of dust and emissions.
- They do not know about road capacity around Wisbech and reject local warnings about gridlocked roads. PINS should not rely on MVV dodgy modelling but instead **insist on a trial run with 350+ lorry movements on several days in winter and early summer between 7am to 8pm on the various routes specified.**

6. MC said the Wisbech plant was needed to stop export of rubbish. And yet hazardous incinerator waste is being exported from Plymouth - and would also be exported from Wisbech? The Government reported that “*On 13 January, at 1447, Nortrader, anchored off*

*Plymouth with a cargo of unprocessed incinerator bottom ash (U-IBA), suffered 2 explosions in quick succession. The first explosion was in the fore-castle store and the second in the cargo hold. The chief engineer, in the fore-castle store at the time, suffered second degree burns requiring 4 months to recover. The vessel suffered extensive damage putting it out of service for over 3 months.*

*Safety lessons - Sea transportation of a cargo that was not included in the schedule of authorised cargoes of the International Maritime Solid Bulk Cargoes (IMSBC) Code - Not conducting appropriate tests that could have identified the propensity of the cargo, U-IBA, to release hydrogen when wet - The inadequacy and the inappropriateness of United Nations Test N.5 for the detection of flammable gases from non-homogeneous material.”*

7. There are many worrying holes in this MVV application. Too many airy indications of answers to come, suggesting they are making it up as they go along, disguised as responding to feedback, proposing anything to get it over the line. **Unprofessional.**

#### IV. COST-BENEFIT POSITION

The Secretary of State should not award a DCO if it would “...Result in adverse impacts of the development outweighing its benefits...”

##### Benefits

MC suggests some 32 jobs **might** be available, although it is doubtful whether they would be filled by local people. Many more jobs would be lost instead. Some **80,000** rely on Fenland agricultural jobs. MVV **might** produce 50+ mw of electricity – debatable and improbable. They are only offering the 'capacity' to do so. MC is a promising man.

The **BEIS Energy White Paper** indicates the importance of *sustainability, affordability, reliability and acceptability* of proposed energy projects. MVV-Medworth fails on all these grounds.

- **Reliability:** Its reliance on diminishing waste and water resources means production at capacity over 40 years will be unreliable.
- **Sustainability:** Its conversion of ordinary waste into toxic pollutants that contaminate air, agricultural land and nature reserves and water supplies – as well as continued use of landfill, fail the sustainability test. It does not include carbon capture. It is not low-carbon or green as it needs to burn fossil-fuel derived plastics to achieve core temperatures, it produces more CO<sub>2</sub> than landfill, as well as dioxins, heavy metals and ultrafine particulates to endanger health and livelihoods.
- **Affordability:** The National Grid/Energy Network cannot sustain over-capacity of electricity supply; hence the recent large payments to windfarms to shut down. The current fresh food crisis indicates that our **Food Security** - the national reliance on Fenland agricultural production for food and employment - far exceeds and outweighs the need for another EfW plant with **limited energy capacity but unlimited polluting capacity**. Our Nation, The Fens and Wisbech cannot afford this dirty incinerator. The associated costs of hosting it are too high, as detailed below.
- **Acceptability:** The lack of alternative sites; lack of respectful and professional consultation; lack of local knowledge; lack of project information not designed to obfuscate, and the lack of competent compliance with regulations at existing plants all

combine to make this project unacceptable. It undermines the UK's legal obligations *re.* Climate Change. Incineration over-capacity in the UK make this project unnecessary.

## Costs

- MVV mendaciously claim their proposal deals with the problem of landfill. It does Not. **Incineration merely transforms rubbish into more toxic substances** that pollute air, water and land. Almost one third of the waste burnt will go to landfill as hazardous waste. Incineration emits more CO<sub>2</sub> than landfill.
- The site straddles the local railway line closed in the '60s but due to be re-opened to re-connect Wisbech with urgently needed employment and education opportunities in Cambridge, Norwich, Peterborough and beyond. **MVV will kill off the railway**, further compounding emissions increases as more cars are brought into use.
- The site poses a **risk to local water supplies** with overuse and contaminants, and it is unclear what happens to contaminated waste water and how its disposal would be regulated and monitored.
- The site straddles the local water management drainage facilities, posing **operational risks for flood prevention** in the area.
- The town's **2 fire engines could not cope in the event of a fire** at the plant. The Environment Agency would not be able to cope with an **environmental clean-up** in the event of an explosion (*cf, Nortrader*) or serious leakage into air, soil and water.
- It is unclear what happens to **contaminated and highly dangerous bottom ash and fly ash** and how disposal would be transported, regulated and monitored.
- It is too near to - and will **contaminate** - Heritage listed buildings in the town and the nearby UNESCO World Heritage nature reserves of The Wash. MVV-Medworth's two chimneys, taller than the Ely Cathedral spire, will distribute toxic, poisonous **particulates** all over the town – our homes, schools and hospital and our gardens, parks and farmland. They will do this day and night, resulting in **serious loss of amenity**.
- In addition to modifying roads, building a connection to the National Grid will cause **untold disruption** to households, local businesses and farmers and ensure gridlock on major arteries into and out of the area. **MVV refuse to consider any other location, despite the patent unsuitability of Wisbech. Why?**
- The **vibration and dust** during 4-5 years of heavy construction will **put the Eye Hospital – only 300 metres away – out of business**. Un-imaginable having cataract operations or laser eye surgery under these conditions.
- Its two 95+ metres high chimneys will distribute toxic, poisonous **contaminants** such as dioxins over the surrounding **prime farmland** that produces much of the UK's fresh foods. Wisbech is in a **nationally significant biosphere and national food security will be compromised**.
- The enormous structure – boilerhouse 50 metres high and chimneys 95+ metres high - will be visible everywhere across the flat Fens, marking out Wisbech as somewhere to avoid. Wisbech town has been a film-set for period dramas due to its wonderful



Heritage Georgian architecture; there will be no disguising the MVV monstrosity.

- **Emissions will not be monitored:** local council environmental officers already are too few in number, are under-resourced and the Environment Agency will do nothing about air pollution. Every undertaking will cynically be given by MVV to be granted a DCO; none will be kept. MVV already pollutes Dundee and Plymouth to uncomfortable levels and is not sanctioned.

- **MVV will kill off recycling efforts** as contracts will force councils to feed the monster more and more rubbish. No one will monitor the plastics and hazardous waste that will be burnt instead of being sorted, recycled or disposed of separately and securely; it will be advisable to check MVV Plymouth's operation for sorting compliance.

- The long-distance, emissions-producing transportation by 350+ lorries of stinking rubbish, and the storage of said rubbish prior to incineration will stink unbearably, attract **flies and vermin and pose a serious public health risk. Methane build-up** during power failures or closures poses additional hazards.

- This enormous 24/7 operation will cause severe loss of amenity and **light and noise pollution 24/7.**

- Its location at the entrance to the town will be an **eyesore**, killing off local tourism, especially cycling, boating and walking holidays. More jobs to be lost. It will **discourage inward investment, reduce employment possibilities, reduce recruitment and retention of staff** for local businesses, schools, hospitals and NHS facilities. Many fresh food and food processing businesses will close, increasing unemployment. Its location in the town will **reduce property values** and consequently reduce council revenues.

- It will further **burden the NHS** with additional health issues - particularly related to ingesting poisonous particulates, and hasten the demise of anyone with cardiovascular or respiratory susceptibilities.

**Incineration is a very serious health hazard.** Covid-19 has highlighted how easily deadly substances can be transported by air. MVV's monstrosity will be pumping out poisonous dioxins and heavy metals all day, everyday with deleterious effects on the health of everyone in Fenland and beyond. The project is wholly unsuitable and unnecessary. Please reject this misguided, bad faith application.

Sincerely yours,

Dr. U Waverley