

Medworth CHP Limited DCO application

Planning Inspectorate Reference: EN010110

Summary of Written Representation, Cambridgeshire County Council and Fenland District Council

1 Introduction

- 1.1 Cambridgeshire County Council (CCC) and Fenland District Council (FDC) (the Councils) submitted joint Relevant Representation (RR) [**RR-002** and **RR-003**] and Local Impact Report (LIR) [**REP1-070** and **REP1-074**].
- 1.2 This document should be read alongside the full Written Representation, the LIR, and the RR.
- 1.3 The Councils do not support the proposal and consider that development consent should not be granted because we maintain it is not possible to mitigate some of the impacts of the development, and that the remaining planning and environmental harm is unacceptable.
- 1.4 The Councils highlight the separate motions approved by CCC and FDC elected Members opposing the proposed development, details of which are in section 2.3 of the RR. Such motions have been approved by all 3 tiers of local government in Cambridgeshire: Wisbech Town Council, Fenland District Council, and Cambridgeshire County Council.

2 Landscape and Visual (LV)

- 2.1 The Councils' view is that the embedded environmental measures described in Section 9.7 of the ES [**APP-036**] are neither sufficient nor appropriate to mitigate the likely significant effects of the scheme.
- 2.2 Furthermore, although a number of the LV effects are defined as 'non-significant' they will still lead to a substantial negative visual impact.
- 2.3 As noted in paragraph 5.2.2 of the LIR, the Applicant has not adequately considered the full extent of landscape impacts, as the LVIA appears to have taken the A47 as an arbitrary boundary for landscape effects.
- 2.4 As stated in 5.4.3 of the LIR, the Councils consider that the RVAT for 10 New Bridge Lane would be breached, with the level of harm being significantly higher than the Applicant has suggested.
- 2.5 The LV impact of the scheme will be amplified when the plume, anticipated at potential length of 582m, is factored in. This is set out in sections 5.3.5, 5.4.16, and 5.4.17 of the LIR.
- 2.6 There will be a stark contrast between the flat, rural character of the landscape to the southern edge of Wisbech and the sheer mass and scale of the proposed facility.
- 2.7 As established in sections 5.3.8 – 5.3.10 of the LIR, the Councils consider that the Magnitude of Change has been underestimated and does not adequately capture the scale of the facility.

3 Climate Change

- 3.1 As set out in sections 9.14 and 9.15 of the LIR, the Councils do not agree that the Proposed Development will have a 'beneficial Significant effect' because the IEMA guidance states that "Only projects that actively reverse (rather than only reduce) the risk of severe climate change can be judged as having a beneficial effect." There is no scenario in which the scheme actively reverses climate change.
- 3.2 Embodied carbon from construction would be a huge source of GHG emissions, that would not occur without the development.
- 3.3 As set out in section 9.4 of the LIR, the GHG emissions from the operational phase are hugely significant.
- 3.4 The Applicant's Environmental Statement (ES) states that the 'without development' scenario leads to all the waste going to landfill, a saving of 2570800 tonnes¹ CO₂e of GHG emissions. The Councils objections are set out in Section 9.4.4 of the LIR.
- 3.5 The significance of carbon emissions is decided not by whether these are lower than an alternative landfill scenario, but whether the emissions from the proposal align with a Net Zero trajectory.

4 Traffic and Public Access

- 4.1 The Councils are concerned by the number of heavy goods vehicles (HGVs), which will cause extensive damage to local roads, and require appropriate recompense for the damage.
- 4.2 The full impact of construction traffic on commuting traffic has not been fully assessed or addressed, please see section 2.10.6 of their LIR.
- 4.3 The Applicant has not provided appropriate processes for the certification of the design and construction of the proposed amendments to the local highway network, and acceptance by the Highway Authority of the infrastructure is contingent upon this certification.
- 4.4 There is insufficient land available along New Bridge Lane to achieve a wide enough access road for the facility, as stated in 2.7.19 of the LIR.
- 4.5 The Councils are concerned by the proposal's potential to prejudice the opening of the Wisbech to March railway, as noted in the Traffic and Transport section of the LIR.
- 4.6 The Councils request the Applicant provide evidence that Network Rail has agreed to the crossing of the disused line, otherwise the main access route into the proposed site will not be viable.

¹ ES EN010110-000458 Vol 6.2 ES Chapter 14. Table 14.31

5 Cromwell Road/New Bridge Lane Junction

- 5.1 CCC's Signals and Safety Audit Team are concerned by the impact of the proposal on the Cromwell Road/New Bridge Lane Junction and consider that an acceptable form of junction design may not be achievable within existing highways constraints, the access to the scheme would be unsafe, thus rendering the proposal unacceptable.
- 5.2 The proposed development may have traffic implications that have not yet been fully assessed.

6 Heritage

- 6.1 Wisbech is an historic market and port town, renowned for its Georgian, Anglicised-Dutch style architecture. The construction of the proposed facility in such close proximity to the town centre, and the views of the development from locations across the town, would be contrary to the Georgian heritage in the town centre.
- 6.2 The Councils re-emphasise sections 6.13-6.15 of their RR, which outline concerns regarding the significant impact on the existing heritage assets and lack of consideration given to these.

7 Air Quality

- 7.1 The Councils wish to highlight that the local residents, viewing the plume from the facility, will perceive that there is an impact on air quality and the effect of the perception of harm should not be underestimated. This is noted in section 4.4.3 of CCC and FDC's LIR, noting the potential for detrimental impacts on mental health and wellbeing.
- 7.2 The Councils urge the ExA to consider all impacts of the proposal, whether they fall into or outside of the 'Significant'/'Non-Significant' binary classification that is often used as a reference in formal technical assessments.

8 Biodiversity

- 8.1 As per 7.3 – 7.4 of the LIR, the Councils are concerned that the proposed scheme does not adequately assess, mitigate, or compensate adverse impacts on Water Vole and priority habitats. Concerns are raised regarding the impact of the decommissioning works and securing Biodiversity Net Gain (BNG).

- 8.2 The Councils, at paragraph 7.3.12 and 7.3.14 of the LIR, consider that the survey work for Water Vole is incomplete and measures to protect Water Voles are inadequate. The ditches along the A47 Grid Connection have not been surveyed making it impossible to properly determine the impact on Water Vole.
- 8.3 The Councils are concerned there is no specific provision to provide mitigation / compensation for loss of Water Vole habitat within the Outline Landscape and Ecology Management Plan [APP-098].
- 8.4 The Councils seek the submission of an Outline Biodiversity Strategy to understand what the Biodiversity Strategy will contain, and how BNG will be achieved.
- 8.5 The Councils note that there is no requirement or timeframe to implement the BNG Strategy, or the percentage that is to be achieved.
- 8.6 Pages 11-117 to 11-118 of the ES [AS-008] identify the loss of 0.59 hectares of scrub within the CHP Connector Corridor during construction, 0.43ha of which would be permanent. The Councils consider that this land along this Corridor is inaccurately attributed as scrub habitat, better fitting the category of Open Mosaic Habitat on Previously Developed Land. The Councils are concerned by the potential for a permanent loss of this priority habitat. The Council would seek to ensure that any unmitigated losses on this habitat are addressed through an amendment to the Outline LEMP [APP-098].
- 8.7 The lack of information and assessment of decommissioning works is concerning. The Councils request an Outline Decommissioning Environment Management Plan (ODEMP).

9 Waste Provision Sustainability

- 9.1 Paragraph 13.1.1 of the LIR sets out the Councils' concerns that the proposal will result in an overprovision of recovery capacity within a small area, which is not compliant with Policies 1, 3 and 4 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021). This may also contradict the proximity principle, with waste likely being sourced from much further afield. The Councils consider that this will undermine the deliverability of the Waste Local Plan in Cambridgeshire and Peterborough, having a negative impact on nearby waste planning authority areas, the environment, and sustainable use of resources.

10 Conclusion

- 10.1 The Councils do not believe the proposed site is an appropriate location for a facility of this scale and magnitude.
- 10.2 The Councils are of the view that the scheme's disbenefits firmly outweigh any potential benefits it may provide.

10.3 The facility would be an ever-present, dominant mass in the landscape, acting as a waypoint for Wisbech.