

# Written Representation

Planning Inspectorate reference: EN010110

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Borough Council of  
King's Lynn &  
West Norfolk



## Proposed Medworth Energy from Waste Combined Heat and Power Facility

This Written Representation submission provides an overview of the Borough Council of King's Lynn and West Norfolk (BCKLWN) concerns in relation to the proposed Medworth Energy from Waste (EfW) Combined Heat and Power Facility (CHP).

It should be read in conjunction with the BCKLWN's detailed Relevant Representation and Local Impact Report.

**It should be noted that at the BCKLWN Council meetings on 25 February 2021 and on 9 March 2023, a motion was passed for the BCKLWN to object to the principle of the proposal for an Energy from Waste facility in Wisbech.**

Appendix 1 includes additional comments received from a BCKLWN Councillor, in response to the proposal.

The BCKLWN's additional concerns and comments are outlined below:

### Noise, Vibration and Dust –

Appropriate noise and vibration safeguarding conditions are necessary, as detailed in our Relevant Representation (RR) and Local Impact Report (LIR) submissions. In summary, a further assessment of the vibration impacts on residential properties during the connection to the grid at Walsoken substation would be welcomed; a separate Construction Management Plan for the works involved in the connection to the Walsoken substation is requested; a detailed and robust site Construction Environmental Management Plan should be provided; a condition to restrict construction related delivery times/vehicle movements is sought; an updated Noise Management Plan should be submitted prior to commencement of operations; further assessment of the vibration impacts on residents during the connection to the grid at Walsoken substation, would be welcomed; and the provision of the new access route via the Cromwell Road link should be opened as early as possible to help reduce the impact on West Norfolk.

### Air Quality –

The BCKLWN has highlighted that there remain some discrepancies with the air quality data. Some of these have been rectified in the draft/revised Air Quality Technical Report received

from the Applicant on 1 February 2023. However, not all points have been addressed, as highlighted within the LIR.

An air quality monitoring scheme is sought, which would include the provision of diffusion tubes.

#### Landscape and Visual –

It is key to retain as many mature/important trees as possible, and any mitigation/replacement planting should be in keeping with the wider landscape. Full landscaping details should be secured via condition.

#### Hydrology –

Flood risk issues at the grid connection in Walsoken will need to be addressed, to avoid harm to the locality. This should include an appropriate flood emergency plan during both the construction and running phases.

#### Contaminated Land –

Based on the information provided, and that the environmental measures, including further investigation are followed, the BCKLWN considers that the contaminated land risks should be acceptable within Norfolk.

#### Conclusion

In summary, there are a significant number of objections to the proposal from local residents, and additionally the Council has a motion to object to the principle of this proposed development.

On the basis of the comments above, and those technical comments raised within our RR and LIR submissions, the BCKLWN considers that the proposal will result in some direct and indirect impacts to the BCKLWN residents, and these should be carefully considered by the Inspectors during the Examination process.

## **APPENDIX 1:**

### **Cllr Alexandra Kemp's Representation against Wisbech Incinerator**

I am Councillor Alexandra Kemp, a Norfolk County Councillor and Borough Councillor, representing Clenchwarton and King's Lynn South at Norfolk County Council, and representing South and West Lynn at the Borough Council of King's Lynn and West Norfolk.

#### **Over Capacity of Incinerators & Breach of Proximity Principle**

Both Norfolk host authorities, Norfolk County Council and the Borough Council of King's Lynn and West Norfolk have adopted In Principle Objections to MVV's proposed incinerator facility on the West Norfolk border.

There is an over-supply of incinerators in the East of England, Norfolk's residual waste reduced last year, there is no need for this facility and, if it were built, it would breach the Proximity Principle, as waste would be brought from areas of high density to the Fens an area of low density and the area that includes half of England's most fertile farmland.

This Application would also breach County Policy. Norfolk adopted a No Incineration in Norfolk policy in 2015 to protect its residents from air pollution, after a multinational attempted to build an incinerator in the ward of South Lynn, causing great anguish amongst the residents of my Division and throughout West Norfolk. In the Borough Council poll in 2011, 65,000 residents voted no to incineration.

Norfolk County Council voted to terminate the South Lynn incinerator contract for planning failure in 2014.

#### **Democracy**

In May 2022 I tabled a Motion at Norfolk County Council, and the whole County Council voted unanimously to oppose this Application for an incinerator on the West Norfolk border in Wisbech. I have also tabled successful Motions at the Borough Council, which also has an In-Principle Objection to the Application.

**The All Parliamentary Group on Air Pollution called for a Moratorium on all new incinerators in the UK in 2021, based on the following evidence on the risk to human health and farming from incinerators:**

**Prof. Vyvyan Howard found that, even though incinerator filters stop small particulates like PM2.5 they allow ultrafine particulates into the local environment which at scale constitute a significant health hazard.**

**Ruggero Ridolfi MD found heavy metals in the toenails of children living near incinerators linked with childhood leukemia, and Kirsten Bouman's found dioxins in chicken eggs up to 10 kilometres away. This means that health impacts will occur in and beyond the poorer neighbourhoods where the government have largely granted 50 development consent orders for new incinerators.**

**Dr Dominic Hogg explained, for every tonne of plastic that is extracted from mixed waste and redirected into a closed-loop recycling stream, about 4 tonnes of CO2 are saved.**

### **Mental Health and Physical Health Impact on Deprived Communities**

The Applicant's Human Health Report at Appendix 16, chose to exclude all consideration of the effect on the mental health of my residents in South and West Lynn of this Application, ignoring the anguish of this community's 5-year long battle between 2010 and 2014 to stop the South Lynn ( " Willows") Incinerator.

The public is aware of the health effects of air pollution and of the danger of uncaptured emissions from incinerators of dioxins and particulates and the link to cancer, respiratory and circulatory disease and even dementia.

We now know that there are 40,000 early deaths a year from air pollution.

My residents live in a ward within 10% most deprived areas in England, many live within the highest indices of income deprivation and experience poorer health outcomes than other neighbourhoods.

MVV'S Human Health Report Appendix 16 said it would not consider the impact of this application on my residents' mental health, because health was not a planning consideration at the time of the Willows Incinerator Application.

This was disrespectful to the community of South and West Lynn and shows that MVV does not consider human health seriously.

Yet again, an incinerator is being proposed that will affect deprived areas. The Medworth ward is also a very deprived ward, Incinerators are 3 times as likely to be build in poorer wards, where the health effects are masked by deprivation.

This Application should be refused as it would perpetuate health inequalities and is the opposite of levelling up.

### **Temperature Inversion Traps Air Pollution and Affects Human Health**

The Application has not taken into account the specific meteorological conditions around the Wash - and the surrounding communities I represent - which increase the potential for adverse air pollution and human health impacts.

The Wash , downwind of MVV'S proposed incinerator, is maritime and vulnerable to temperature inversion, which traps pollution near the ground in King's Lynn, often for days, causing a pollution haze and sparking respiratory difficulties in the local population.

### **Vulnerability of the Wash to Air Pollution**

The Applicant's reports do not acknowledge the existing vulnerability of the Wash to current sources of air pollution that affect human health. The Wash habitually suffers from air pollution from sand carried on the winds from the Sahara 2,000 miles away, particularly in

the Spring, which mixes in the air with local agricultural and industrial pollution and also from industrial airborne pollution, carried across the North Sea, from the Ruhr industrial area in West Germany. This created a yellow haze in Clenchwarton in April 2014 for 2 weeks and residents attending the Parish Council found it hard to breathe. The pollution level in Norfolk was at the top of the Government Pollution index

It is not credible for the Applicant to conclude that air pollution from its incinerator 11 miles away could only be negligible or insignificant, when sand carried on the wind from over 2,000 miles away can have an adverse respiratory effect.

Negligible or insignificant amounts of toxins can have a serious effect on human health.

South and West Lynn and Clenchwarton are settlements along the banks of the River Ouse, and 15 km, as the crow flies, from Wisbech. Dust is even carried from the port of Lynn on the east side of the River Ouse across the River Bank to West Lynn and covers car windscreens. The powerful carry factor of air pollution is being ignored by MVV

### **Wrong Meteorological Comparison**

The applicant's predictions of negligible impact on the environment and to human health from its emissions are based on readings from Marham, which is inland. This is inappropriate.

### **Prevailing Winds**

The applicant's reports take no account of the strong prevailing south westerlies from Wisbech to the River Ouse and the Wash and the carry factor of elements from the incinerator plume to King's Lynn, the first town after Wisbech, across the open, flat Fen landscape.

The ferocious strength of the winds around the Wash have caused habitual floods in King's Lynn over the past millennium, including the International Disaster, the Great Flood of 1953 in which 15 residents in South Lynn were sadly drowned. King's Lynn was the locus of the Storm Surge in 2013.

### **Risk to Human Health**

Incinerators emit dioxins, furans, cadmium, lead, arsenic and plastic compounds PCB's and PAH's harmful to human health, but the incinerator filters do not capture all the particulate matter and cannot capture gases from the combustion process. Once in the atmosphere, secondary particles form. The toxins emitted are forever chemicals that can take years or never to decompose and will enter the soil, water and air and residents' lungs.

The 90 ft high incinerator chimney is designed to raise emissions high above the local population but the toxic material in the plume will be carried by air agitation and eventually descend and it is likely the south westerlies will carry particulate matter towards West Norfolk and the open farmlands of South Lynn, on the north boundary of MVV'S 15 km " Plume Study Area".

### **Precautionary Principle**

I ask the Planning Inspectorate to follow the All Parliamentary Group on Air Pollution's stance on no new incinerators, and the Precautionary Principle, and refuse this Application.