

## Submission opposing the Planning Application – March 24<sup>th</sup> 2023

- *“MVV’s UK business retains the overall group ethos of ‘belonging’ to the communities it serves whilst benefiting from over 50-years’ experience gained by its German sister companies.”*

Five authorities - Wisbech Town Council, Fenland District Council, King's Lynn Borough Council, Norfolk County and Cambridgeshire County Council, as well as the local North East Cambridgeshire MP and Secretary of State for Health, Steve Barclay, have opposed MVV's Proposed Development.

Why has the Applicant gone against their overall group ethos with this Planning Application when they have long-known the community doesn't want it?

- Throughout the Planning Application and in response to questions, wordings are far too often non-committal: 'are planning', actions 'will be considered,' 'where suitable,' 'wherever practical,' 'will look to.' Use of these vague, hollow, meaningless, non-committal wordings are not acceptable.
- The National Planning Policy Framework sets out that development should only be refused on traffic and transport grounds if there would be unacceptable impacts on road safety or on the road network more generally.

Given the A47 is a trunk road, the impact to the A47 and its connecting junctions should be assessed by National Highways - where are the impact assessments from National Highways, I've only seen their compulsory purchase comments?

- Royal Mail *“is seeking to secure mitigations to protect its road based operations during the construction phase”* due to its regulatory duty.

What about every other business in the vicinity who will undergo the same level of disruption that Royal Mail acknowledges this application will have on them? The values, interests and concerns of the many affected private local businesses are just as valid.

- From the site safety aspect, it is not clear whether the intention is for staff, visitors and delivery vehicles to be sharing the same access roads from the public highways. Whilst it says: *“MVV are planning to provide at least one access point to the incinerator via New Bridge Lane close to the A47”* it does not make it clear who this is for.
- Cllr Peter Human, leader of Wisbech Town Council, expressed a need for a requirement to restrict how many vehicles access the site.

Mr Booth said MVV will look to impose measures on the amount of HGV traffic to the site.

Apart from being yet another non-committal reply, how can MVV impose such measures when they have already provided the high in/out numbers of HGV traffic needed to feed and service the facility? There are turnaround times, HGVs won't wait. Mitigation measures through timing prohibitions are ignored and therefore ineffective unless monitored by an external body, and it is known the Local Authority does not have the time or the finances to ensure compliance.

- This Planning Application not only has a significant impact on Local Authorities' carbon and NOx pollution, which cannot be “mitigated” away, but also comes at a very significant cost to Local Authorities and residents that is not paid for by the Applicant profiting from incinerating waste they intend to bring into Wisbech from a long distance away.
- *“The Applicant is committed to improving biodiversity as a result of the Proposed Development.”* There is nothing mentioned that could not easily be added without the Proposed Development and carried out by people in their own gardens!

### **Waste Hierarchy and Fuel Availability**

- **MVV's website: “Why Devonport? Plant at North Yard offers significant advantages**

*The decision to build the plant in Plymouth was based on the fact that most of the waste within the SWDWP area is produced there. This also means the lowest increase in traffic."*

- The Planning Application says the incinerator would burn household residual waste to generate electricity.

Having been unable to identify any Local Authority interest in its vast catchment area, and given it will be a merchant site, there is no guarantee it will actually end up burning residual household waste if sufficient customers, with sufficient household residual waste aren't there. In an area of relatively low waste generation – even C & I, it rather looks like this is little more than a planning application for an available site.

Rather than the Planning Application being a clear 'solution' to a 'problem', the Applicant appears to have artificially created a 'problem' for their profitable solution'.

- At the ISH Mr Booth said: "We say all of this is residual waste and will be secured by a requirement that only residual waste will be taken to this facility."

Just because they say it is residual waste, doesn't mean it is. When a local authority collects residual household waste it does not process it any further - they can provide an assurance that to them, it's residual waste because it came from those bins, but they know full well it will contain recyclable materials in amongst it. Even the Applicants own documents show they will be burning materials which can be recycled.

There no evidence showing the Applicant even considered treatments further up the waste hierarchy, before burning the 'residual' waste, when recyclable materials are known to exist in hugely significant quantities with a facility of this size. Rivenhall will have multiple treatments higher up the waste hierarchy on its site. Cory's Riverside has a front-end MRF, a treatment which could and should be incorporated into a 625,000tpa facility, and a site to be selected with room to accommodate it, rather than simply an available site.

- Despite claims the Proposed Development would divert more than half a million tonnes of non-recyclable waste from landfill a year, this failure to incorporate a front-end MRF alone suggests it would divert a significant proportion of waste from recycling rather than landfill.
- **MVV's website admits their facility at Ridham Dock is producing energy from a waste feed taken from other energy sources ... (emphasis mine)**

"The power plant at Ridham Dock incinerates around 172,000 tonnes of waste and non-recyclable timber a year ...

The plant will be fuelled by waste timber and non-recyclable timber, as well as by processed and contaminated timber, such as plywood, chipboard, old furniture and construction site timber. **This material from within the region in south-east of England was previously incinerated elsewhere ...**"

By their own admission MVV are not moving waste up the waste hierarchy, their plant has not been used for a capacity shortfall, neither are they generating new electricity at their Ridham Dock facility. They are simply removing another incinerator's feedstock and energy generation for their own profitable gains.

As I said previously in my 'Additional Submission Responding to ISH Part 3,' this planning application appears to have the same intent - MVV are clearly eyeing NCC's waste – that waste would not be producing new energy, it would simply be existing energy produced from another EfW facility – just like MVV have admitted with Ridham Dock.

And for NCC to make the claim "Norfolk will be a leader in waste prevention and increasing the recycling of resources ..." they clearly have a plan, and therefore for MVV to include or even chase NCC's waste, it must be considered that they would be attempting to source waste away from recycling, that they would then treat further down the waste hierarchy.

- At the ISH Mr Carey said the site would divert more than half a million tonnes of non-recyclable waste from landfill a year, yet the Planning Application makes it very clear throughout that much of the waste identified is not currently land-filled, but going to another incinerator.

No allowance appears to be made for Essex being embroiled in a long legal battle with UBB after signing a contract in 2012 for the Tovi Eco Park in Basildon, the failure of which meant Essex waste being landfilled in the short term until Rivenhall is running in 2025.

- **NPS EN-1 and EN-3 set out a national need for development of new nationally significant electricity generating infrastructure.**

Given the Proposed Development barely meets the NSIP generating criteria, that there is no evidence that it will be generating 'new' electricity, or that it will have sufficient fuel availability to do so in the future in accordance with the waste hierarchy, this Proposed Development should not benefit from the NPSs' presumption in favour of energy development infrastructure.

- **The scale of this facility, in this location, brings into serious question whether it conforms to EN1 - 'the need for predictable and controllable energy' or**
- **EN5 - to balance the intermittent sources (solar or wind).**

This is highlighted by Suffolk's 269,000 Gt Blakenham incinerator in 2020, less than half the size of the Proposed Development - when its operators SUEZ applied to increase the capacity by 10% to 295,000tpa because the residual waste did not have a high enough calorific value **to maintain the level of electricity it provided to the grid**, despite stopping the recycling of Tetrapaks in order to burn them. According to the plant manager, the need for more rubbish was down to the fact that a larger proportion of plastic was being recycled and not thrown away, yet Defra recorded Suffolk's recycling in 2017 at 47%, down from 51% four years previously when the incinerator had just started and had not increased by much before 2020 to necessitate this increase - certainly a long way off from 65%. This has a knock on need to source more waste from this region.

- Suffolk also burns 52,000 tonnes of recyclable food waste annually, 35 % of the incinerator's feedstock, which adds to the calorific value.

Food waste will be banned from this waste stream before this facility is built, decreasing residual household waste by around 30-35%, and decreasing its calorific composition - every EfW incinerator across the country, not just this region, will be looking for around 35% more waste.

35% becomes a very significant figure to those authorities tied into very long incinerator contracts like Suffolk County Council, significantly more the larger their facility's capacity.

For the Proposed Development alone that will be almost 220,000tpa more - the equivalent of having to feed another EfW incinerator next door.

- When plastic is recycled and recycling is increased, the knock on effect would be compounded further, nationwide the calorific value of waste could be too low at facilities' current capacities and, like Suffolk, needing to increase their capacity **to maintain the level of electricity provided to the grid.**

From "MVV Volume 6.2 Chapter 6 Traffic and Transport"

*6.6.81 The EfW CHP Facility would be **designed to handle 523,500** (nominal) tonnes of residual (non-recyclable) waste per annum at 10.9MJ/kg (approximately 625,600 per annum at 9.8MJ/kg). Under low CV and high availability conditions the mechanical throughput could be as high as 625,600 tonnes of waste per annum.*

For the Proposed Development, given the wider range of operation, 1.1mj/kg is a fairly small drop in calorific value to cause the need for 100,000tpa of waste. Therefore, well before this Proposed Development were to begin operating, it would be operating outside that which it was designed to handle.

- The Applicant is using economies of scale to make a significantly bigger profit, and viewing waste as an unlimited, highly profitable problem, rather than a valuable resource that needs to be reduced and recycled.
- By their own admission, the location for this vast Proposed Development was identified and decided upon over a decade ago, using outdated fuel availability figures, which do not apply to current or future waste arisings.
- **Given its enormous capacity and lack of future-proofing feedstock, this Proposed Development cannot be considered to be either a reliable or sustainable source of energy generation.**
- **This planning application has not made robust arguments to demonstrate a proven ability to conform to EN1 - 'the need for predictable and controllable energy' or EN5 - to balance the intermittent sources (solar or wind).**
- **The scale of this facility, in this location, brings into serious question whether it conforms to NPS EN-3 - 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.**

The Applicant has not provided robust arguments to support the new facility and there is no proven need for it to be located in Wisbech or indeed Cambridgeshire.

Given the scale and the Applicants own admissions, it appears likely that waste feedstock will be competed for, and quite possibly, rather aggressively.

- When anxious scrutiny is given to the far-reaching, negative knock-on effect this Planning Application will have on existing council contracted facilities across this vast catchment area; on those who are locked in to long term contracts and have a serious financial need for their existing facilities to maintain minimum tonnages for decades; and on Local Authority's own ambitious waste plans for increased recycling, the adverse effects of this massive facility, in this location, far outweighs its benefits, is contrary to NPS EN-3, and no robust evidence has been provided as to why an exception should be made.

It does not satisfy 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

- Whilst the Proposed Development has the potential to provide heat and steam, it would be wrong to say it "would" given the Applicant's lack of robust evidence. Likewise, Mr Carey said: "Our proposal will offer lower costs and more sustainable energy for local businesses," - offering and actually providing are very different, and there is a lack of robust evidence that it will provide.
- Mr Carey said, they have been looking at this site since 2010 and "*the presence of potential heat and power customers was a key factor when selecting the location for the Proposed Development.*" Sourcing and provisionally agreeing with draft heads of terms on heat and power off-take in the area would be one of the first and foremost considerations. For there to be no interest within the CHP Connection Corridor after all these years - suggests in itself the site is not in the right location for this Proposed Development.
- Being of such a massive capacity, in the wrong location, it does not have the local interest needed to justify such an expensive outlay for connection, and any attempts at a later date would wrongly rely on taxpayers' money from the government to fund it.
- Therefore simply having the ability to provide steam and heat should not be a factor in its favour.
- **Applicants claims that the Proposed Development will bring benefits to Wisbech.**
- At the ISH when Mr Pinto asked Mr Carey what benefits the incinerator will bring to Wisbech - his response slid around with all the standard benefit claims of an EfW incinerator - there would be "a lot of economic benefit over the lifetime of the project, which is around 40 years". Pressed

further, he said the plans would **offer** lower costs, energy security, lower carbon footprint and more sustainable energy for local businesses

'Offer' is not providing.

- The firm also **aims** to provide skills and employment opportunities for school and college students in the area.

'Aiming' is not providing, and no numbers are given.

- "As a company, we **strongly believe** giving most benefits as possible to local companies whose services we require, like welders, scaffolders and civil engineers."

'Strongly believing' is not providing - as has already been said there is a national skills shortage, It is unlikely much will come from the local area, and being a very small market town Wisbech does not have the capacity for any sizeable influx of workforce.

- Whilst any large scale building project is attractive to boost the economy in the short term, that benefit is not confined to this location and could potentially occur anywhere in the country.

However, in this deprived location, such a large scale project would be highly detrimental, not least because the roads around the proposed location are already inadequate, particularly Weasenham Lane and its notorious sink holes.

- The Applicant has demonstrated that it knows almost nothing about the location of its Proposed Development other than it has an available site.

You have to know Wisbech, you have to know the area of the Fens it's situated in to understand that the construction of such a massive infrastructure project in this location would have such a seriously negative impact it would far outweigh any perceived benefits.

The Applicant has failed to provide any robust evidence to support any real benefits.

- **Food production and processing forms a major part of the area's economy.**

- Why has WHO's advice been ignored - their best practice for siting incinerators has the goal of finding a location for the incinerator that minimizes potential risks to public health and the environment. It further advises:

***"minimizing the number of people potentially exposed, e.g., areas near the incinerator should not be populated, containing housing, athletic fields, markets or other areas where people congregate. Areas near the incinerators should not be used for agriculture purposes."***

- Given that the UK is in the process of handing decisions over the UK populations' health to the WHO then one must assume this guidance must receive significant weight against this Proposed Development, in this location,

## **Greenhouse Gases and Climate Change**

The Planning Application claims to offer a lower carbon footprint and Mr Carey said at the ISH that MVV has made a "strong commitment to achieving net zero by 2040 and to be climate positive thereafter."

This planning Application shows no evidence of that.

- **Environmental Statement Chapter 14: Climate The assessment must include the location of the waste materials source, how they will be transported etc. and the associated modelling.**

In the main, EfW incinerators are built with full agreement of the Local Authority who provide over half the capacity as a contracted element of household residual waste for the 40 year duration of the facility, and as such, those transport routes are clear.

However, the Applicant has not only been unable to identify any contract household waste customer for this massive 625,000tpa 40 year facility, but zero actual interest or intent. As a result, all the Applicant has been able to offer in this Planning Application are guesstimates, and limited only to routes into/out of Wisbech from various directions.

Given this crucial information is impossible to obtain, this assessment is impossible to fulfil.

- The same applies to the lack of information provided for the transportation of the IBA and APC residues, which contribute 54 two- way movements per weekday.

Chapter 6 Traffic and Transport makes it quite clear which direction and routes these are going in/out of Wisbech but that's where it ends.

Along with an additional 6 weekday two-way consumables, that equates to a significant 300 HGV movements per weekday – for 40 years.

This is inadequate. Local authorities have been given responsibility for tackling roadside nitrogen dioxide concentrations, and these HGV contributions occurring daily for 40 years will make a significant contribution to local authorities NOx, the roads and loads carried must be provided in any Planning Application.

Since it comes out of local authorities budget this will be a negative effect.

- **Insufficient account taken of emissions from the construction of the Proposed Development.**

Construction is responsible for a huge amount of emissions globally. In 2018, the buildings and construction sector accounted for 36 per cent of energy use and 39 per cent of energy and process-related carbon dioxide (CO2) emissions. This includes the manufacture of key materials such as steel, cement and glass.

To reduce overall emissions, the sector is obliged to (amongst other things) decrease building materials' carbon footprint.

- To even begin to evaluate the real carbon footprint for the construction of the Proposed Development it is necessary to know where all the building components are coming from. How they will be transported to site and along which roads.

All those components have a carbon footprint.

- Again, since local authorities have responsibility for tackling roadside nitrogen dioxide concentrations, LA's need to know the roads and loads to determine the contributions.

German companies are well-known for using German companies and people, and rightly so, it supports their economy. However, it removes a considerable economic boost for the UK.

- When MVV bid for Norfolk's incinerator their submission was contradictory - taken from NCC's bid evaluation:

*"The MVV submission demonstrates a strong commitment to explore pre-fabrication and off-site production of building components to reduce waste and carbon emissions; however it is possible that this could clash with MVV's stated ambition to procure construction materials from within 30km radius of site."*

- The Planning Application should be detailing this information in order to determine the true carbon footprint of this massive construction project, including all transport delivery routes for all local authorities to determine the NOx contributions.

- **WRATE modelling baseline is landfilled.**

- A report for Tolvik Consulting " **UK Energy from Waste Statistics - 2019**" highlighted there is currently limited consistency in the way in which the carbon impact of EfW is calculated both in the UK and Europe. Whilst it is acknowledged that setting the basis for calculation is potentially



complex, it appears that analysis is currently being used more as an exercise to promote a particular project or theme, rather than as a robust assessment of environmental performance.

- *“In addition, by managing waste which would otherwise be landfilled, the Proposed Development would deliver an estimated 2,571ktCO<sub>2</sub>e saving over its lifetime when compared to a base case which is that this waste would continue to be landfilled.”*

This ‘promotion’ is evident in the Planning Application since much of the Applicant’s targeted waste appears to be burnt somewhere else, or would be treated higher up the waste hierarchy, not landfilled.

The Climate Change Committee’s 2020 Progress Report expresses concerns about the proliferation of energy from waste plants because of its competition with recycling and seeks mechanisms to reduce carbon emissions from those plants. .

There does not appear to be any basis to claim that the proposed facility will have any benefit in terms of reducing carbon emissions – let alone their claim of an estimated 2,571ktCO<sub>2</sub>e saving.

- Quite the opposite – given that reports agree that EfW plants release an average of around one tonne of CO<sub>2</sub> for every tonne of waste processed, the reality shows that due to its size, location and vast waste catchment area, it will significantly add to the problem, and likely to be the worst environmental option for dealing with the region’s residual municipal waste.
- Burning Norfolk’s waste in Wisbech vs being burnt at Bedford’s Rookery Farm, burning Essex’s waste in Wisbech over the range of treatments at Rivenhall, burning Bedford’s waste in Wisbech over Rookery Farm, or burning Suffolk’s waste in Wisbech over Great Blakenham - none of these reduce the carbon impact.

All it does is transfers the carbon impact of burning from several different areas around the eastern regions to one location in Wisbech, creating a far larger, single-point burden on the local authorities surrounding Wisbech, while increasing NO<sub>x</sub> from its associated transport.

- Where are the Applicant’s figures showing those increases?
- The Applicant has failed to provide a clear and robust assessment that the Proposed Development will deliver any carbon benefits and should carry little weight.
- Given the Proposed Development will, however, have significant adverse impacts through significantly increase carbon emissions to this one location, thereby creating a far larger, single-point burden on the local authorities surrounding Wisbech, while simultaneously increasing NO<sub>x</sub> from its associated transport, this should carry significant weight against the Proposed Development.

## **IBA, Fly Ash and APC residues**

A decade ago, Dr Mark Broomfield, expert witness representing an incinerator company, said **the bottom ash is a greater risk than the main stack.**

The treatment of these by-products is one of the most under-explained and most ignored aspect of the Planning Application. Around 197,000tpa of hazardous and potentially toxic by-product is created during the incineration process where none existed in the feedstock.

- Although it is the end product of the facility it is the most dangerous part of process, and needs clarification in much greater detail than the Applicant has provided.

Whilst the Travel & Transport - road use - makes it quite clear which direction and routes IBA & APCs are going, the Planning Application information appears to end when these products leave site by HGV. As a product of the Proposed Development this is not the end of accountability or responsibility

- As part of the Proposed Development it has its carbon footprint contribution, and given the IBA & APCs contribute 54 two-way HGV movements per weekday, there is a need to know the roads and loads for the Local Authorities they pass through to assess the NOx contributions.
- Most importantly, there is a need to know who and where the APCr and IBA is going, in order to know they have the necessary experience and expertise to handle and treat this safely; whether they are going to an existing facility or a new one, and what track record they have.
- Given the uncontrolled and heterogeneous nature of domestic waste in the UK, it is likely that both the fly ash and bottom ash will contain a wide range of hazardous contaminants including heavy metal oxides and asbestos. This also applies to metals removed after incineration.

Since it is clear that the Environment Agency have neither the resources nor the appetite to oversee the regular testing of these by-products for their hazardous material content, the Applicant must provide details of what monitoring and testing will be carried out on them, where will it be carried out, and by whom.

This detailed information must be provided to avoid any possibility of heavy metals leaching into the environment when landfilled under roads, or anything else it will be used for. Equally, there is a need to detail the steps to safeguard contaminated metals being recycled.

- Much is made of 'recycling' metals from the IBA after burning – this is simply lazy recycling. Burning not only greatly reduces the value of the metal, but produces highly toxic emissions, which would be completely preventable with very basic front-end recycling.
- Both the EA and PHE should be the ones to highlight the highly detrimental health effects of burning metals, yet they fail to say anything – this is a dereliction of duty and discriminates against the local population who have no choice but to inhale.

## **Water**

Clearly Anglian Water have no objections to making money supplying the eye-watering quantity of public drinking water to this Proposed Development. At this time of water scarcity, and this area being one of the driest in the country, it beggars belief that water can still be regarded as being in bountiful supply rather than the increasingly precious resource that it is.

- The Environment Agency go against their own policies and guidelines to ignore the dangers of this Planning Application in a Flood Zone 3, even though there's no evidence that the Applicant even considered another site, and the so-called "mitigation measures" are wholly inadequate.
- There are serious and significant impacts with this site location which are also ignored by government's statutory advisers. who appear to put others' interests before the interests of those they allegedly protect. Surface water on the site is likely to include chemical constituents from the ash or process water from the ash-quenching, which could potentially enter the River Ouse via drains, thereby impacting internationally designated conservation sites in The Wash, and make their way into the vast network of drainage ditches and channels serving the surrounding farm land on which Wisbech heavily relies. Heavy rain could seriously impact the lagoons.
- There is no robust evidence that this could not or would not happen, and together with the huge burden that the quantity of public drinking water required for over 40 years would put on the eastern region, should carry significant weight against this proposal.
- But an added significant concern in the area of water are Anglian Water's record amounts of untreated discharges.
- Surfers Against Sewage estimated last year alone, Anglian Water discharged 200,000 hours of untreated sewage outflow into rivers and coastal regions in storm overflows – and we know this is now going to be allowed to continue until at least 2050.



This isn't new, it's been going on for many, many years and after successive substantial cuts to their budget, the water monitoring by the Environment Agency has been non-existent - the water industry, just like the incinerator industry, has been left to self-regulate.

- Years ago a senior consultant for the Environment Agency told the Guardian (about the cuts):  
"They plummeted to the point it was impossible for the Environment Agency to know what's going on."  
"They had no control or monitoring capability that was meaningful."  
"They ceded the control of monitoring to water companies, which ended up being able to mark their own homework. They take their own samples and assess whether they are being compliant."

*"Water Connections: A new water main connecting the EfW CHP Facility into the local network will run underground from the EfW CHP Facility Site along .... to join an existing Anglian Water main. An additional foul sewer connection is required to an existing pumping station operated by Anglian Water located to the northeast of the Algores Way site entrance and into the EfW CHP Facility Site."*

- There is no robust evidence to suggest water from this Proposed Development will not be part of a storm discharge directly into the river and into The Wash, with no monitoring to prevent it. If Anglian Water cannot cope now what will happen when the billions of gallons from this Proposed development are added to its existing burden. This does not come under the Applicant's water management plan and there are no "mitigation measures" that can be taken to reduce or prevent this happening. This adds further significant weight against this Proposed Development in this location, due to the significant and devastating impact it could very likely pose to vitally important farmland and the internationally protected Wash.

### **Air Quality - Are Best Available Techniques (BAT) being used**

It is well known there are pollutant concentrations coming out of incinerator stacks after all treatments, filters and "mitigation measures" are taken, but we are told a 90m tall chimney ensures they are adequately dispersed before they reach ground level to reduce/remove their potential impacts on nearby populations. Given that this has not been measured or studied, it is impossible to verify as true.

Amongst others, incinerators emit dioxins, furans, cadmium, lead, arsenic, aluminium, mercury, iron, zinc, copper, manganese, plastic compounds PCB's and PAH's, all harmful to human health - bioaccumulation over prolonged exposure found 23 heavy metals in the toenails of young children. Incinerator filters do not capture all the particulate matter and cannot capture gases from the combustion process. The toxins emitted can take years or maybe never decompose and will enter the soil, water, air and lungs of humans and animals wherever they land.

- It is the number of ultrafine particulates not their combined mass or weight that is important for determining ill-health, because these smallest particulates act like a gas and enter the blood stream and organs creating damage to the hearts, brains, and lungs of victims.
- PHE restrict their advice to findings on PM10, which are far, far larger and heavier particles and therefore more able to be captured - thereby emissions of PM10s can be more easily dismissed as 'insignificant' or 'negligible.' The inspector can verify this by asking for the 'specific' advice PHE received, on which their statement is based.
- Given the significant harm to health comes from PM2.5s and these ultrafine particulates, it is evident that what is dismissed as negligible or insignificant amounts of toxins can have a serious effect on human health, particularly through bioaccumulation over 40 years,

There are thousands of chemicals in products we are burning everyday, and have done for decades, yet no studies have been undertaken into the synergistic effects, the formation of secondary particles from gases during combustion, and how this is affecting people working and living in the area.

This decades long failure to receive anxious scrutiny from those entrusted with public health demonstrates another area of significant HPA/PHE/UKHSA negligence and a further reason why their advice should be ignored for this Planning Application,

- **Are Best Available Techniques (BAT) being used**

- The Environment Agency granted developers at Rivenhall EfW facility an environmental permit in 2017, but following a requirement for a lower stack, they feared the incinerator would emit high levels of oxides of nitrogen, sulphur dioxide and heavy metals.

The EA then agreed to accept changes from the applicants **to apply stricter limits on the emissions of oxides of nitrogen, sulphur dioxide and lower limits for certain heavy metals (which in itself admits heavy metals are emitted from the stack), and change the primary means of controlling nitrogen emissions through advanced filtering technique.**

The EA says these changes make a 35 metre high stack acceptable.

EA team leader for Rivenhall, Frank Saunders, said: "We believe that a lower stack is acceptable but only in conjunction with the significantly lower emission limits."

- Regardless of stack height, it is important to know if these stricter emission limits have been imposed on this Proposed Development, and if it has an equally advanced filtering technique.

If not, it is not using **the best** available techniques, just one BAT from a list of many, and is not protecting the local population and environment in the light of what is already known and scientifically acknowledged, and should give significant weight against this Proposed Development.

The benefits of this Proposed Development are outweighed by the non-compliance with policies.

The negative visual intrusion landscape and impact on heritage assets are significant given the flat Fenland landscape, and the need for this facility, in this location, has not been robustly demonstrated.

The benefits it would bring to Wisbech are insignificant when weighted against the significant increase in traffic and their associated emissions, together with the single point of focus of carbon emissions from across the vast catchment area identified.

The Applicant has not robustly demonstrated that this facility will only be treating non-recyclable waste and therefore not in accordance with the waste hierarchy.

The environmental and health implications due to the size/capacity of the facility and its location are huge, and the Planning Application fails to offer adequate assurances on environmental, health and nature conservation consequences.

This Planning Application should not benefit from the grant of consent.