

**1 Deadline Submission 6 – July 12<sup>th</sup> 2023. Lack of Steam Customers for proposed MVV CHP EfW installation. INTERESTED PARTY NUMBER 20032543. Tom Howlett.**

As an interested party I have previously submitted comments concerning MVV’s lack of alternative(s) involved in their decision to locate the site of the EfW Incinerator in Wisbech. I have deliberately omitted the “CHP” element from the title as this is not realistically relevant. My previous comments are detailed below. and they focus particularly on the claim by MVV that they are building conduits for steam to supply both Lamb Weston and Nestle Purina.

We have supplied written evidence that both Companies detailed above have no interest in working with MVV and their polluting monolith, especially as the only benefits from this project will be passed to Mannheim City Council. Nestle Purina have now doubled down on this rejection with a new Global statement issued at the end of June 2023. This statement commits Nestle to avoiding any relationships in their supply chain with CO2 producing energy plants, even allowing for offset nonsense. Lamb Weston have continued to support WisWin with their banners being posted on fencing re-enforcing their objection to MVV encroachment adjacent to their Wisbech facility.

How strange then that MVV have been allowed to waffle their way through this issue stating that steam supply was a major motivation for their decision to choose Wisbech. Have they given any real answers to Planning Inspectorate that have been denied to the public? If not, why is Mr. Carey allowed to continue to spin spurious tales stating that his steam customers are confidential and cannot be discussed at this sensitive time?

This murky situation is also compounded through Anglian Waters submission to Inspectorate at Deadline 5, dated June 15<sup>th</sup>. Under their sub-heading, Water Resources, bullet point 6, they state “Anglia Water understands that the steam supply requirements of 63cm/hr (at MVV) should not result in a net increase in terms of available water resources, as it will replace the water supply used by existing customers in the vicinity of the facility”. It appears they have also been sold the story that MVV have “understandings” with Lamb Weston and Nestle.

Will the Planning Inspectorate be asking Anglian Water to reassess their position on water supply, on the basis that Lamb Weston and Nestle Purina may not be seeking partnerships with MVV? However, on the basis that Planning are already aware of the steam situation we would have anticipated this is already in the pipeline.

**ORIGINAL SUBMISSION**

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My name is Tom Howlett and am speaking as a member of WisWin. I would like to talk through MVV’s basic logic of selecting Wisbech as a suitable location for their proposed mega incinerator.

In the applicant’s initial Preliminary Environmental Information Report Chapter 2 , June 2021 they set out 4 essential siting criteria, which were deemed so “essential” that they felt no such need to submit alternative locations, even though the Planning Inspectorate request such.

**Here are the 4 essential criteria:-**

- 1. SIZE OF SITE.**

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“MVV (the applicant) set a minimum site area requirement of 3.5 hectares to accommodate an EfW CHP facility of the type and size proposed. At approximately 4 hectares the initial site identification process confirmed that the EfW CHP Facility site was of sufficient size. Not controversial and nothing that should necessarily tie the proposal to Wisbech. Although not essential it was later mentioned that the site was already involved in some waste processing; recycling and packaging for onward journeys. Also the site was owned by Mick George, a business involved in hauling waste across Eastern England.

Subsequently, in their June 2022 Environmental Statement MVV then decide to include in their essential criteria the fact that CCC could have available 314,000 tonnes of mixed waste to divert from landfill to their incinerator, based on 2019/2020 figures. Perhaps this may have been an after thought to pad out this location. It would be hoped that this figure would reduce significantly with impending legislation on food waste and other recycling, It should be borne in mind that if approved the incinerator would be present to blight Wisbech until at least 2066!

**2. ACCESS TO STRATEGIC HIGHWAY**

“Good access to the strategic highway network!!” This is where the siting criteria begins to reflect a complete lack of knowledge of the road system approaching Wisbech. The only dual carriageway in North Cambs is 2 miles through the centre of Wisbech, a route thankfully denied to the HGV vehicles planned to service the Incinerator. The A47 from Thorney to Wisbech along which a good part of the 350 plus additional HGV movements must travel is 14 miles of single carriageway, which during the summer months is an extremely busy road carrying commuters, caravans and agricultural vehicles. There are regular accidents and road blockages. One other access route proposed is the A1101 from Downham Market, a very dangerous single track route. When these HGV vehicles carrying waste, raw materials, bottom ash and fly ash potentially arrive or depart Wisbech they are scheduled to funnel down a short stretch of Cromwell Road, a feeder road to Supermarkets and Retail Parks. Very strategic. In local vernacular it is trying to make a silk purse from a sow’s ear!

So far the essential siting criteria doesn’t carry much weight. In fact there must be many more isolated sites that could be serviced far better with less issues.

**3. PROXIMITY TO HEAT AND ELECTRICITY CUSTOMERS.**

The third essential criteria concerns the “Proximity to potential heat and electricity “customers”. There are a number of existing commercial operations which are understood to have requirements for steam and electricity”. In 2022 Environmental Statement. Chapter 3, MVV expand on this” opportunity” and detail potential end users for heat and power along the line of the disused March to Wisbech Railway and advise “discussions” have been held with

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these users. Two major users are now detailed, **Lamb Weston** and **Nestle Purina** and it is confirmed that the CHP Connection Corridor has been designed specifically for these 2 potential end users.

WisWin has had contact with both of these Companies since 2021; Lamb Weston a major food processor, who see many possibilities in potatoes have confirmed to WisWin in writing that they see no possibilities in dealing with MVV, and to publicise their position have had 4 WisWin anti incinerator banners on their perimeter fencing for 18 months. Nestle Purina have twice confirmed to us in writing that “although energy from waste plants can play a valuable role in reducing the amount of waste going to landfill they have no plans to partner with MVV on their proposed project for Wisbech. In this instance they believe there are more appropriate alternatives which can deliver the renewable energy we need, IN SUITABLE LOCATIONS, as part of our journey to net zero.” (Technical Director and CEO UKI)

Did MVV discussions go more positively? If not perhaps the project should be renamed EfW and not CHP.

The information from these two Companies shows the data submitted by MVV to be fragile and based on chances, maybes etc. **(It should be noted that Mr. Carey, MVV, refused to address this essential point in his final response on 23/02/2022.)**

**4. ABILITY TO EXPORT POWER TO NATIONAL GRID.**

The fourth essential criteria is the ability to export electricity to the national transmission or distribution electricity networks. Realistically this criteria could be fulfilled better in many other locations. (In 2022 they include a number of potential commercial and industrial customers of electricity which could be supplied by a private wire.) It should be noted that one local food processing business who maintains that their position is under threat from being close to a potential vermin stronghold were offered 20% reduction by MVV for their power costs. Some compensation.

Fundamentally these 4 essential criteria do not stand up to scrutiny especially when they state that this site selection is so good they do not need to seek an alternative. It could be suggested that the siting best fits their billion pound business plan, the proceeds being filtered to Mannheim City Council. Furthermore they may have calculated that Wisbech gives the appearance of a depressed community thus less likely to fight their proposal.

Bluster and arrogance comes to mind, especially considering the fact that the local populace have no benefits on offer yet so much to lose particularly with the largest school in the area a stone’s throw from this site.

Where are these benefits trumpeted by MVV? Why do MVV state that they are building a pipeline to carry steam to Lamb Weston and Nestle Purina, at great expense, when both Companies have rejected their approach for supply of Heat? This smacks of intimidation – a fait accompli, now you have to take it!!!

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I request you to take this information on board and reject the application from MVV, thus allowing the good citizens of Wisbech to carry on with their lives as they see fit.