

From: Tony Clee [REDACTED]
Sent: Tuesday, January 30, 2024 5:28 PM
To: Medworth <Medworth@planninginspectorate.gov.uk>
Subject: Fwd: MVV-Medworth EN010110

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From: Tony Clee [REDACTED]
To: [REDACTED]
CC: [REDACTED]
Date: 05/08/2021 22:31 BST
Subject: MVV-Medworth EN010110

I wish to make my objection to the proposed mega incinerator for our small Georgian town. The grounds for my objection are as follows:

- 1) That the proposed development is entirely unsuitable for a small town of around 32,000 residents. If given consent, the development would be the most significant industrial activity by far in the whole region.
- 2) That the road infrastructure is inadequate to support the regular daily movements of heavy lorries needed to feed the incinerator and take away the waste bottom ash.
- 3) That the incinerator presents a health and safety risk to nearby residents, schools, hospitals, care homes and businesses
- 4) That the surrounding land is largely agricultural and contamination of soils and crops would present a further risk to health and the livelihoods of growers
- 5) That the development would destroy the remaining historic character of Wisbech as a Georgian market town.
- 6) That the development goes against the government's own strategy to reach zero carbon by 2050
- 7) That the required consultation has taken place against a background of lockdowns and pandemic, giving little chance for residents to engage fully with the process
- 8) That the developer has compromised the trust of the community by circumventing local planning decisions in the knowledge that a smaller one would be refused. The veracity of this widely held view is dependent upon the need for such a large incinerator which is unproven.
- 9) That the literature MVV has distributed throughout the affected region should be informative, but is instead partial and misleading, sometimes grossly so.
- 10) That the real cost, the opportunity cost of this development is huge. Other uses for this area of land offer far more opportunities for employment and dealing with household and industrial waste if that is seen as the main priority without compromising the health and safety of the residents, the viability of nearby businesses, and the character of the town. There can be little doubt that the prevailing model of waste management by both landfill and incineration is being overtaken by climate friendly systems which seek to minimise non recyclable waste, notably in packaging and single use plastics, and establish a circular economy which makes these wasteful practices redundant, and recycle, retrieve and reuse increasingly scarce resources.

- 1) The unsuitable nature of this development is abundantly clear. A popular secondary school with

1200 pupils is a mere 750 metres away. Other smaller schools are even closer. Wisbech Grammar School is in the historic centre of town. Residential housing, care homes, and surrounding agricultural land, an eye hospital and local hospital, retail park, cinema, supermarkets and many businesses would be close neighbours. Many have voiced their opposition on the grounds that the area would become increasingly unattractive to visit for shopping and as an area to work in.

The environmental permitting guidance for the siting of waste incinerators makes clear that the 'location of an incinerator can significantly affect the dispersion of the plume from the chimney, which in turn affects ambient concentrations, depositions and exposures to workers and the community. It goes on to state that 'best practice that minimises potential risks to public health, soils, foods can be achieved by avoiding low lying areas, (the site is actually on a flood plain) minimising the number of people exposed and that areas near an incinerator should not be populated, contain residential housing, athletic fields, markets or other areas where people congregate. Areas nearby should not be used for agricultural purposes. The development breaches all of these guidelines.(Environmental permitting guidelines, Waste Incineration. GOV.UK 2015 and WHO)

2) The road infrastructure is an insurmountable problem since it is fundamentally inadequate to the task. Under the proposal, HGV construction traffic would initially access the site via Algores Way, an unadopted road requiring a CPO for its use. and necessitating constant use of Weasenham Lane, passing close to Thomas Clarkson School and existing businesses and adding to the substantial congestion which already exists in the area. Construction would take 36 months of earthworks and piling for the retaining walls. This would include excavation for the waste bunkers 12 metres below FFL . Although MVV claim in their Preliminary Environmental Reportt the level of the site is in accordance with flood risk assessment, MVV have since stated that parts of the building will need to be raised 3 metres. They claim not all construction traffic will use this route, However, the only other road, New Bridge Lane, would require substantial widening and changes to its access from Churchill Road.

MVV claim that all access and egress would be via the A47 from Guyhirn to Wisbech, Churchill Road and New Bridge Road. The A47 is notorious for closures due to accidents and congestion leading up to the only two lane carriageway available outside the area and leading in the direction of Kings Lynn.

In use, the plant will generate 320 vehicle movements per day from 7 am t 8 pm every day for every day of the year, not counting refuse lorries and those taking away bottom ash. Approximately 28 vehicle movements an hour, one every 2 minutes...A plant of this size should be served by connections directly on at least A roads, not a local network.

The Preliminary Environmental Information Report Ch 6 Traffic and Transport, The National Planning Policy Framework p109 states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residential cumulative impacts on the road network would be severe'. It is clear that this would be the case. It continues 'that the access and highway network serving the site are suitable and not cause unacceptable harm to the environment, road safety or residential amenity'. It fails on all counts.

3) The incinerator presents a health and safety risk. Attention was drawn recently to Chemparks industrial and incinerator park run by Currenta following an explosion in Loverkusen west Germany on July 21st 2021. Sixteen people were injured and five missing, with black smoke engulfing the area. Residents were advised to keep their windows closed. If a similar accident happened at the MVV site in Wisbech, will it be possible for emergency crews to access the site quickly and easily? It certainly

doesn't appear so.

There has recently been an explosion at MVV's incinerator at Dundee, and a fire at the associated MVV plant at Mannheim. It isn't surprising, there are health and safety issues since the enterprise itself involves considerable associated dangers. These are ever present in the nature and scale of the project. The additional air pollution problems and particulates arising from the movements of 300 diesel lorries, extra congestion and fumes and potential for dust and odour alone would be an unwanted addition even without burning 650,000 tonnes of waste.

Where will the waste come from? It could be anywhere from west or mid Wales to the south coast of England, according to MVV's stated radius of 200 miles.. Fenland District Council's assessment of the facility suggests Wisbech risks becoming a dumping ground for waste materials, where a lucrative waste disposal business will look attractive to public and private firms who want to pay to have their waste products disposed of even if this has a major impact on air quality and amenity experienced by people living in the town.

4) MVV's submission involves the construction of two chimneys 93 metres in height, the intention being to spread the emissions as far afield as possible and avoid the concentrations which would be deemed unacceptable by any monitoring agency. But much of the surrounding land is agricultural, growing a range of crops. It is not possible to completely eliminate dangerous particulates including dioxins and furans by a series of filter bags and scrubbers. The problem is that even in low concentrations, neurotoxins will accumulate in the soil and become bio concentrated in crops, thus spreading the contamination over a far wider area. The many orchards in the area are also vulnerable to these air borne particulates. Since the operating lifetime of the incinerator is around forty years, it must be apparent even to the applicant that this poses a long and enduring threat to the the health and safety of not only locals, but consumers much further away, and to the livelihoods of the growers in the region, to whom even the threat real or actual could destroy the trust that consumers need that produce is wholesome and uncontaminated.

In addition, the Fens are particularly well regarded amongst growers for having some of the richest and fertile soils in the country. This is an invaluable resource and far outweighs the benefit that could possibly accrue from the burning of thousands of tonnes of waste.

5) One of the most striking elements of the incinerators design is that it is completely at odds with the character of the historic part of the town which has hundreds of buildings, including monuments and an attractive park area which are all within a kilometre distance of once of the biggest incinerators in the country topped by two chimneys as tall Big Ben, and surrounded by a 2.3 metre high perimeter security fence with security cameras and lighting. It will be more like Gulag 17 than anything tourists might expect to see and anything experienced thus far by anyone in the region.. MVV claim the lighting will be subdued when the frenzied activity of the coming and going of waste lorries has stopped. Given that it will be from early in the morning (7.00 am) to evening (8'00pm) and much of this activity will take place in darkness during the winter months, intrusive lighting will be another source of light pollution as well as noise and airborne pollution. The ability to see the stars in the night sky is one of the reasons why many city dwellers have chosen to live in the area, an often forgotten but valued jewel in the crown of living in a semi rural area.

6) The government will host this year COP 26 which brings together leaders of the world committed to reducing the world's carbon emissions. Th electorate are rightly alarmed at the accelerating nature of climate change, and have witnessed the raging forest fires, flash floods, drought, retreating ice cover in polar regions and glaciers. They want to see action which goes beyond the bold pledges. So far many of the actions do not match the words. There is a new sense of urgency. But we need openness and honesty.

MVV claim that the incinerator is carbon neutral, but the legitimacy of this claim is on the grounds that by contributing 50 MW of electricity, it displaces the same amount of fossil fuel derived energy.

This clearly absurd. Incinerators are net contributors to greenhouse gases, their CO2 contributions virtually matching the tonnage of waste incinerated. This isn't surprising in view of the fact that much of the waste contains plastic, derived from fossil fuel, and it in fact relies on such presence in its waste stream to reach its operating temperature. If it doesn't, dioxins and furans are not subject to the required two seconds of immersion intended to reduce them. The exact nature of the waste stream changes constantly, so the injection of diesel is required to adjust it. Another fossil fuel. and another deception. As is the denial that nitrous oxide, a more powerful greenhouse gas, is also emitted. In all a combination of CO2,N2O,NH3 (Ammonia),all contributors to the greenhouse effect and climate change.

7) The pandemic has provided the background to much of the proposal for the greater part of the consultation period. This has meant that the exhibitions meant to provide further information to a concerned populace has been poorly attended. Conflicting information from the presenters including the applicant has often been reported. As a consultation exercise it has been a joke, even if it has fulfilled the legal requirements. It has, of course, also limited the ability to hold meetings by those opposed to the construction, and challenge some of what appear to be glib dismissals of genuine concerns by people who will be affected by its construction.

8) Locals are well aware that National Strategic Infrastructure Projects need the approval of the Secretary of State, thereby circumventing local democracy, FDC oppose it. Both MPs for the affected areas oppose it. There is a great deal of resentment that the applicant has deliberately avoided a smaller scheme which would have been denied approval. Yet there appears to be no justification for an enormous incinerator of this kind, unless the intention is to establish Wisbech as the waste burning centre of a far wider area.. The applicant's claim to be 'dealing with waste for a better tomorrow' will ring hollow to those who live in the area and in the wider community who look to the government to provide a sustainable common sense approach to dealing with waste. It is sustainable only in the sense that we continue on the wasteful path we have pursued for too long, with overconsumption and wastefulness at the centre of our lives, in contrast to the realisation, long overdue, that this cannot continue and all the economic systems of forward looking governments need to work together to embrace this issue and respond appropriately. Burning millions of tonnes of waste in this area over the lifetime of its operation will without doubt be seen by the generation which will succeed us as the monumental folly it is.

9) It is essential that the applicant is seen by the community as an honest broker. Yet the glossy literature provided by MVV is clearly intended to misinform and project an image of delighted locals enjoying its newly arrived guest. It is a deception. The construction will take 36 months to complete, during which time people will suffer the most intensive building works ever seen in the area. There is a majority feeling in the affected region that this project should not proceed. The roads intended to serve what MVV call a 'facility' are not adequate, one crucial one, Algores Way, an unadopted road, belongs to Fenland District council who are opposed to the scheme, Some of the site which MVV need to build on does not belong to them despite maps showing the extent of the intended works. This inaccuracy becomes apparent only after subsequent maps showing the proposed layout of the temporary storage, office and parking facilities on FDC owned land.

MVV mention the building of a railway. Yet this is not part of their submission, and is only intended to attract readers sympathetic to the reopening of the railway to accept their sleight of hand. A few people are actually deceived by this, even though MVV do not elaborate beyond the statement that they would welcome it and it would be up to others to reinstate it. They don't add that Network Rail consider the line a 'live' issue and would be unlikely to approve an incinerator running in close proximity to it. Moreover, since the steam piping to the local factory supposedly to be served with it runs alongside the line, the potential for serious accidents involving high pressure steam are all too obvious. They should be honest and admit that the impact of installing Combined Heat and Power

infrastructure along the former rail track would render the reopening impossible.

10) This is the most exciting part. The opportunity cost of this monumental folly makes the case that the simple economic basis of incineration, although a money spinner for the applicant who is able to dodge the lack of an incineration tax, (surely an oversight and due to be closed) to pick up a 'green' subsidy under the false pretext that it is sustainable and renewable, just fades into insignificance in comparison to the number of good, interesting uses, not to mention jobs which could take place.

Take, for example the CoFarm Foundation in Cambridge, bringing communities together in the establishment of a town farm, growing local produce in organic sustainable ways, with the introduction of diversity and the horticulture of a wide range of produce, some shared and some donated to local food banks. This is largely a community enterprise with volunteer input and if taken up here could provide school children with the valuable experience of learning a range of skills which most of them have never experienced.

Or the idea, already in use around the world, of workshops which take items bound for scrap or incineration, as the basis for refurbishment, for resale in local shops.