



From: Nigel Roberson [REDACTED]

Sent: 23 November 2023 14:50

To: COUTINHO, Claire C [REDACTED]

Subject: Incinerator

Dear Secretary of State,

[Call to Refuse Medworth Incinerator EN010110](#)

[Incinerators increase carbon emissions and greenhouse gases](#)

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I writing to ask you to refuse the Medworth Incinerator

EN010110 in your role to bring about Net Zero, because the National Infrastructure Commission is asking the Govt to ban all future incinerators that do not have plans for carbon capture and storage. I understand you are due to make the decision in November whether to allow this incinerator.

The Medworth Incinerator does not have plans for carbon capture and storage.

If Medworth is built, the UK will be placed further behind in its goal to achieve Net Zero. The Medworth Incinerator would increase carbon emissions and bring the UK further from its goal of Net Zero by 2050.

In addition, the National Infrastructure Commission calculates that the UK could save £6.2 billion by 2050, if it increases recycling rates and does not build new incinerators.

The Govt must do more to boost and encourage the circular economy and increase recycling rates.

Recycling more and burning less will help the UK achieve Net Zero.

Incinerators cause 25% of waste industry emissions.

But recycling rates have stalled over the past decade at 45%, after increasing rapidly in the first decade of the century.

The Govt won't meet its target to increase recycling by 65% by 2035, if it allows new incinerators to be built.

Incinerators Redundant

All waste items, metals, paper, wood, glass can be recycled.

A third of black-bin waste is food, which it will soon be mandatory across England to recycle. The rapidly advancing plastic recycling industry, and measures to prevent plastic,

will all make incineration redundant.

The National Infrastructure Commission says the waste treated in incinerators should reduce by 25% by 2035, and by 80% by 2050, and that Local Authorities should not sign or renew, long-term contracts for waste.

Over Capacity of Incinerators & Breach of Proximity Principle

Both host authorities in Norfolk, 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, 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 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 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. I also spoke at the Medworth Planning Enquiry this year.

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 can 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".

I ask you as Secretary State, to follow the National Infrastructure Commission and the All Parliamentary Group on Air Pollution's stance on no new incinerators, and the Precautionary Principle, and refuse the Medworth Application.

Yours faithfully,

Kind regards

Nigel

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