

Item 4: Relevant Representations for Medworth MVV Energy from Waste Combined Heat and Power Facility Development Consent Order (DCO)

Public questions from Ginny Bucknor, Campaign Co-ordinator, WisWIN - Wisbech Without Incineration

ISSUES

4.4.4. Visual Impact: "The assessment has concluded that there would be no significant landscape or townscape effects apart from locally significant effects".

The incinerator would be surrounded by properties (including already agreed new builds literally adjacent to the site). The two chimneys will be higher than Ely Cathedral and, being in Fenland, will impact not just the local area but for miles around.

4.4.7 Hydrology - *employing 700 staff to build will also have an impact. Where would they even be accommodated? Can CCC obtain clarification on full time hours as this figure in itself is meaningless.*

4.4.9 Socio Economic - *Food Factories have stated to MVV they will have to close as they will not meet the hygiene requirements of their customers. One specific company's response was omitted by MVV when reporting to the Planning Inspectorate for which they apologised after the deadline. Can CCC establish the impact storage will have on the food factories surrounding this incinerator.*

4.4.12 Education - *the impact of the 4 year build in a built up area with the identified schools cannot be underestimated. The noise impacting the whole area during piling works alone would be enormous. With regard to vibration, the Environment Agency state an impact assessment is required. Surely this assessment must be done prior to agreement of it going ahead, bearing in mind the schools and homes so close to the proposal?*

5.4 "... followed to ensure good practice and ensure an open and transparent decision-making process ..."
Can WisWIN be included in the notification process please?

7.3 Statutory, Legal and Risk Implications.

There has been a personal cost already by residents and the campaign team in engaging with this application as well as Officer time in all the councils. However we believe a significant cost was made in engaging an outside professional for a specific aspect by CCC for the Waterbeach proposal and we would naturally expect that a budget consideration would also be given for Wisbech.

7.6 "Local Member Involvement – PINS guidance sets out the role of the local authority, and officers will ensure that local members are kept informed at key stages in the NSIP process."
Can WisWIN be included in such notifications please?

Newbridge Lane Access

In item 3.2 it states "The principle of widening/ extension of Newbridge Lane is acceptable." Further on:

3.9 The existing carriageway of Newbridge Lane is highly unlikely to be of suitable construction for retention and will need to be removed in its entirety or completely reconstructed to the County Council Distributor road specification, particularly beyond the unit adjacent Salters Way".

The description of this small road - the word "Lane" expresses it more accurately. The proposed access is immediately opposite the large Tesco store and the Lane is currently heavily used as far as is accessible. However, as stated in the Council's report, this disappears into a pedestrian path which is used locally, particularly by students from the Thomas Clarkson Academy as a safe short cut from one side of Wisbech to homes near the other side. Tesco is also objecting to this access because of the impact it will have on their business.

Volume 3.1 Draft DCO

3.13 "The proposed DCO will require review by County Council Managers and legal representatives ..."

Criticisms of the lack of information are made throughout this section of the Council's report and this is shared by businesses and residents too. Whilst there was no comment in this part of the report with regard to traffic volumes to

New Bridge Lane, the campaign team undertook a formal traffic survey in a 12 hour period from 7.00 am to 7.00 pm identifying the already heavy use of the Cromwell Road by New Bridge Lane. However this was done during Covid. During the normal summer months the A47 by the Cromwell Road is very heavily used by visitors heading to the North Norfolk Coast (including caravans). Getting an ambulance to our main hospital in King's Lynn during these summer holiday congestion periods is challenging, let alone when there would be an additional 360 daily lorry movements from the proposed Incinerator site.

3.32 The application site is proposed to be serviced by five key routes ..."

As above but has consideration also been given to the proposed 22-25% of additional sealed lorries leaving the site to remove the toxic ash?

3.33 "Whilst the proposal is to create a new access from New Bridge Lane, a significant amount of the non-HGV traffic will be using the existing road network passing the TCA site and also in close proximity to the Cambian Education Foundation Learning Centre (CEFLC) and the Riverside Meadows Academy (RMA) school locations. Therefore this will potentially have an impact on all these schools, particularly during peak times (drop off and pick up times) and to not acknowledge the location of these schools is of concern".

We appreciate the Report has recognised this and is a major concern to parents with children at the three schools in the immediate area. This area is already challenging with many lorries going from Weasenham Lane (where the schools are located) into Algores Way already (one child being killed by a lorry. Additionally, it would appear that due to the Fen soil, Weasenham Lane has had the road collapse several times recently. Has significant consideration been given to this?

3.34 As above and highlighted in this paragraph. Is the Council aware this is also the route to the many businesses along Algores Way AND it is not unusual for a queue of cars along Algores Way to enter the Recycling Centre?

4.4 The baseline assessment has used noise monitoring data from November 2021 which is within the Covid-19 lockdown period and therefore should not be considered a true representation of the baseline noise levels.

A great deal of MVV's work was done during Covid - not least the "consultation period" where very few people were prepared to attend.

Can anyone explain to Wisbech residents how adequate consultation can be considered acceptable to the Planning Inspectorate? Equally given that Wisbech has 30%+ residents from Eastern Europe, there were NO explanation whatsoever in any other language.

5.6 In Table 8B4.3 Odour concentration 3,000 OUE/m³, the source of this assumption should be provided.

5.7 With reference to Table 8B4.3 Odour release rate 133,333 OUE/m³, based on the other parameters stated in this table, the odour release rate appears to be incorrect.

Does this refer or include the proposed 11 days of storage that MVV want which is a major concern of the food factories and residents in the surrounding area ?

6.2 "The Proposed Development would recover useful energy in the form of electricity and steam from over half a million tonnes of non-recyclable (residual), non-hazardous municipal, commercial and industrial waste each year. The Proposed Development has a generating capacity of over 50 megawatts and the electricity would be exported to the grid. The Proposed Development would also have the capability to export steam and electricity to users on the surrounding industrial estate. The maximum parameters of the main building are 52m in height, 177m in length and 102m in width. The maximum parameters of the 2 chimneys are 90m".

Please note when we directly raised this with the Managing Director he stated that the chimneys would be higher than 90 meters to allow for a larger concrete platform to be built to mitigate issues when building on this flood plain. Has this been recognised by the Council with regard to its responses?

6.7 "The Consultant's assessment has concluded that there would be no significant landscape or townscape effects apart from locally significant effects within the landscape character area closest to the Proposed Development, which is the Wisbech Settled Fen landscape character area. As set out above, there would be many significant visual effects during construction and operation. Significant effects have also been identified to arise from the decommissioning phase."

We could not disagree more with this opinion. Wisbech, in Fenland, is flat. We have 266 Listed Buildings, including three Grade 1 within the town, just a few minutes from this site. The two chimneys will be higher than Ely Cathedral. As already stated, MVV advised they will require to build the concrete base higher to mitigate for building on a flood plain. Surely therefore the Consultants comments are not an assessment but more a conjecture. We would ask councillors and officers to go on line, type in Manheim Incinerator and see the impact on that City which has a population more than 10 times bigger than Wisbech.

6.8 In the Landscape and Visual Assessment (Chapter 9) of the Environmental Statement, it states that the pupils and staff at the TCA would experience a 'Very Low' and 'Low' magnitude of change at both construction and operational phases. The only elements of the proposal that would be visible from the TCA would be the 90 metre chimney columns and upper section of the building. Even though no viewpoints have been prepared from TCA or Weasenham Lane, there will be a change to the skyline when looking south from the TCA and Free School site, although they would be of low level of magnitude."

This is at odds with the Transport Section on noise and pollution. Environmentally, this incinerator will be surrounded on three sides by residential properties as well as the local schools. This is NOT in a field out of town but IS surrounded by properties and schools in the town of Wisbech. We would therefore ask the comments to be amended to more accurately reflect the m will have on the local residents and schools.

7.5 "Fenland District Council's Conservation Officer and Historic England will provide comment on the impact to Conservation Areas and Listed Buildings as we do not comment on these matters in relation to infrastructure schemes. We are awaiting this information which will be included in the final submission. There are no scheduled monuments in Cambridgeshire that will be directly or negatively affected by the scheme."

We have 266 Listed Buildings, including three Grade 1. The two chimneys will be higher than Ely Cathedral and the incinerator itself will be a huge visually imposing blot on the surrounding properties. Can Cambridgeshire County Council advise when they expect a comprehensive report from Fenland District Council?

9 Hydrology (ES Chapter 12)

NO mention has been made of building on this Flood Plain and unclear and no mention of liaison with the relevant Drainage Board. May we have clarification please.

10.5 "Carbon Capture and Storage (CCS) has not been included in the proposal. CCS is probably necessary in order to reach net zero.

10.6 The scale of emissions is huge, in both scenarios, with and without. the main source of emissions from either waste disposal method (landfill or incineration) are in the same ballpark of around 11 million tonnes CO2e over 40 years.

10.6 The scale of the emissions is huge."

Fenland is known as the "Bread-basket of England". Our farmers are equally concerned about the emissions. There appears little mention of the polluting impact this Incinerator will have on the surrounding fields. Is this outside the Council's remit?

For the Council's information, there is a proposal to build an Incinerator in Boston by the docks. It has included carbon capture. It was due for a decision by the Secretary of State by the 6th October. This has been deferred, presumably because of the new Cabinet.

12 Health (ES Chapter 16)

12.1 *Wisbech already has a higher than the National average of residents with asthma; the town is below sea level. Would the Council please give consideration to providing further data in this regard from NHS?*

14. We are concerned there has been no mention of the additional sealed lorries that will be removing the toxic waste to another site. What consideration has the Council given to this aspect?