

Response to the Scoping Opinion

for Medworth Energy from Waste Combined

Heat and Power Facility (Wisbech)

The Planning Inspectorate

Case Reference: EN010110

January 2020

Response provided by Mo Stewart

Retired healthcare professional

Wisbech resident

March 2020

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Planning Inspectorate
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27th March 2020

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MVV Environment Ltd., Case Reference: EN010110, January 2020

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000010-MEFW%20-%20Scoping%20Opinion.pdf>

This response to the above Scoping Opinion is provided by Mo Stewart, a resident of Wisbech and a retired healthcare professional. Contact via email: Mozzas01@gmail.com

** As a declaration of interest, please be advised that my home is very close to this planned development, which is potentially hazardous for the wellbeing of the community.

** The Scoping Opinion is a response to the publication of the 228 page EIA/ES Scoping Report provided on behalf of MVV Environment Ltd by Wood Environment & Infrastructure Solutions Ltd to the Planning Inspectorate, regarding the planned development of the Medworth Energy from Waste Combined Heat and Power Facility, Wisbech.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000006-MEFW%20-%20Scoping%20Report.pdf>

RESPONSE TO SCOPING OPINION

It is beyond my comprehension why, when a similar much smaller development was rejected for the neighbouring town of Kings Lynn, it is now presumed by the Applicant that this enormous construction will be welcomed in what is the very small neighbouring market town of Wisbech.*Not all community concerns can be limited to environmental impact assessments.

Having had brief personal contact with Paul Carey, who is the Development and Support Manager for the Applicant, MVV Environment Ltd, there is an assumption and a presumption by the company that the proposal will be supported by the Inspectorate, as recycling of plastic waste is a government priority, and any consultation within the community is perhaps little more than damage limitation. Mr Carey, who is also a Director of the company, is prepared to answer questions. He's not prepared to accept any possibility that this development will be refused by the Inspectorate.

** During discussion, Mr Carey gave the distinct impression that he fully anticipates the development to be approved by the Inspectorate. He justifies it as offering cheaper power to surrounding industrial estates by the creation of steam, which is then converted into power. It is anticipated that the planned new facility would eventually generate about 53MWh, which will be exported to the grid. However, the company's Scoping Report also advises that any excesses of power will be offered for sale to the national grid or to international markets. Therefore, clearly, it is not essential to build this large development within this small, historic market town especially when the applicant has failed to consider alternative sites.

As a local resident living close to the proposed development, it is cause for serious concern to note the numbers of items listed in mitigation, in particular by Public Health England (PHE) and Cambridgeshire County Council (CCC). "... *facility will be capable of handling over 500,000 tonnes of residual waste per annum. It is suggested that this level of capacity could generate significant transport journeys.*" ... "*Waste would be brought on site between the hours of 06.00 and 19.00 seven days a week, except Christmas, Boxing and New Year's Days.*" (CCC)

Furthermore, no consideration has been demonstrated by the Applicant as to the negative impact on health and quality of life, which will effect residents during the construction and operation of the incinerator, and the fact that an additional heavy burden will be created by the vast additional amount of planned HGV traffic arriving at the incinerator daily when the roads are already heavily congested. **** A full Health Impact Assessment is essential.**

****** It is totally incorrect to suggest that operational vibration can be disregarded (4.2.2) As a Wisbech resident I can testify to the vibration created by HGV traffic on the nearby main roads. Any increases in HGV traffic will increase this identified vibration which will be intolerable and, over time, has potential negative implications for the value of local property.

Evidence from Kings Lynn identified a negative impact on air quality with the potential for the creation of preventable harm. It is unacceptable for the Applicant to claim that changes to baseline air quality "*...are unlikely to significantly alter the baseline air quality to an extent that would affect the outcome of any assessment*". The Scoping Opinion has already established that the net effect on changes to air quality is "*difficult to establish*". (4.3.5) Therefore, I suggest, this is a very good reason why this development should be rejected as this potential to cause preventable harm to the local community is a risk that cannot be evaluated prior to operation. Any development of this size should be constructed a very long way away from any built up area, especially from schools. (PHE refers)

It is cause for further concern that the Applicant considers the area of construction to be of "*low landscape value*", and so presumes there can be no other objections to prevent the development (4.4.1) **HOWEVER**, what has been dismissed is **the negative impact** on the surrounding landscape value should this development be built, which is destined to negatively impact on nearby property value, and the possibility of a future major accident from this development cannot be disregarded given how close it is to a populated area.

****** No consideration has been given by the Applicant or the Inspectorate it seems regarding the negative visual impact of having this development, which will be easily identified in the approach to the town by the **planned 95m chimney** which will dominate the skyline. (4.4.3) (4.4.4)(4.4.6) It is unacceptable that the Inspectorate presumes to 'scope out' the assessment of visual effects on the town which is a priority concern for residents.

****** It is cause for concern that the Inspectorate demonstrates a lack of awareness of this small market town by suggesting that the effects on tourism can be disregarded during construction and operation. This is an incorrect assumption. (4.10.1). Part of the attraction of the town for tourism is the fact that Wisbech is a historic market town, whose attraction I suggest will decrease with the construction of a large chimney when the '*Applicant states that the plume would be "periodically" emitted from the chimney during operation of the plant and would be "intermittent"*' (4.4.14), whilst emitting as yet unknown quantities dominating the skyline.

Re: Public Health England (PHE)

**PHE have raised significant concerns:

“Identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities, as well as other vulnerable population groups such as those who are young, older, with disabilities or long-term conditions, or on low incomes) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development.

...

“Long Term Effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects... **including childhood leukaemia...**

(My emphasis MS)

Re: Mitigation: CCC Appendices

*EIA: Environment Impact Assessment *ES: Environmental Statement

“It is noted that the EIA/ES will include any measures that have been embedded in the proposed development with a view to avoiding or minimising environmental effects, or delivering environmental benefits. Although construction phase impacts are transitional they, and any operational phase impacts, **have the potential to cause unacceptable effects to the health and quality of life of those living and working near the site.** It will need to be demonstrated that significant adverse impacts/effects or just adverse impacts have been minimised. When considering mitigation measures the EIA/ES will also need to consider whether the envisaged measures make for an **unsatisfactory development** in other planning respects for example in terms of urban design, visual or amenity impact requirements. Such cross relationships will need to be identified and addressed. (My emphasis. MS)

...

“Paragraph 2.3.25 is noted for its statement that the proposed Energy from Waste Combined Heat and Power facility will be capable of handling over 500,000 tonnes of residual (non-recyclable) waste per annum. It is suggested that this level of capacity could generate significant transport journeys. The location of the proposed facility is bound by key transport routes **that are already congested due to high volumes of traffic.** The traffic impacts of the proposed development will therefore need to be fully assessed. (My emphasis MS)

...

“Paragraphs 2.3.44 – 2.3.47 of the scoping report considers the access improvements and suggests that such improvements would form part of the Development Consent Order (DCO). Based on the proposed tonnage of residual waste and **the congestion of current strategic transport routes within Wisbech,** it is suggested that improvements to the transport network are needed to support this proposed development. There is a need to fully understand all the transport and traffic impacts and ensure that such appropriate mitigation is determined.

(My emphasis MS)

Main Alternatives Considered

“Whilst it is proposed to consider some alternatives e.g. site layout, design and access, identified in paragraph 2.2.4 of the scoping report, **alternative locations are not to be addressed.** The proposal would be located on an allocation in the adopted Cambridgeshire

and Peterborough Minerals and Waste Site Specific Proposals Plan (DPD) February 2012. However, this site was allocated for waste and recycling uses, **not for Energy from Waste (See Policy SSP W1C)**. Accordingly the reasons why the site has been selected for this development, and whether or why other sites have not been considered, should be explained. (My emphasis MS)

Chapter 3: Planning Policy

Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Site Specific Proposals Plan (2012)

“The scoping report correctly identifies the above documents as being part of the adopted Development Plan for the site. However, in addition to the site being allocated under Policy SSP W1C for Waste Recycling and Recovery, it is also safeguarded through a Waste Consultation Area designated under Policy SSP W8D, and the overarching Core Strategy Policy CS30 Waste Consultation Areas. This is not mentioned in the scoping opinion. (My emphasis MS)

“**Para 3.3.2 is incorrect**, as the allocated site Algores Way, Wisbech is not allocated through the Core Strategy, but the Site Specific Proposals Plan, under Policy SSP W1C, not Policy WC1. (My emphasis MS)

“As the scoping report approaches planning policy on a subject basis it does not necessarily capture all the policies which are relevant to this proposal. One such policy is Core Strategy Policy CS29: The Need for Waste Management Development and the Movement of Waste. Another policy omitted is the overarching Policy CS2 Strategic Vision and Objectives for Sustainable Waste Management, which also needs to be taken into account in the EIA/ES or in a Planning Statement. (My emphasis MS)

Cambridgeshire and Peterborough Minerals and Waste Local Plan (Proposed Submission, November 2019)

“The Algores Way, Wisbech site is safeguarded through the above Plan as a Waste Management Area, under Policy 10: Waste Management Areas. Policy 16: Consultation Areas addresses the Consultation Area around the site, which is not mentioned in the scoping report. The Waste Management Area and the associated Consultation Area is shown on the Proposed Submission Policies Map. (My emphasis MS)

“The detailed timetable for the process of the EfW application, if accepted by the Planning Inspectorate on behalf of the Secretary of State, is not yet known. The timetable for the emerging Local Plan is for the Examination to start in summer 2020, with the Inspector’s Report anticipated in late summer or early autumn; and adoption in November 2020. It is therefore possible that the Local Plan will carry more weight by the time the Examination of the EfW proposal takes place, particularly if the Inspector’s Report has been received and the Councils are moving towards adoption. Thus, it would be advisable for the Environmental Statement (ES) to fully consider how the proposal sits with the policy of both Plans, the currently adopted and emerging. (My emphasis MS)

“No reference is made in the scoping report to Policy 1: Sustainable Development and Climate Change, except for in the context of the Climate Change Chapter. However, this policy is wide

ranging and full consideration of its requirements needs to take place. The other technical chapters should consider if this policy applies, as it also references air quality, transport, design etc. (My emphasis MS)

“As the scoping report approaches planning policy on a subject basis it does not necessarily capture all the policies which are relevant to this proposal. The EIA/ES (or a Planning Statement) should ensure that all relevant policies are taken into account, including Policy 3 Waste Management Needs and Policy 4: Providing for Waste Management. Consideration should be given as to how the proposal sits against these policies, and other relevant evidence documents supporting the Local Plan, including the Waste Needs Assessment, November 2019 and Developing a Spatial Strategy for Waste Management Provision, November 2019. (My emphasis MS)

Chapter 5: Traffic and Transport

“A Transport Assessment (TA) will be required to outline the trips generated by the proposed development and how these are to be mitigated, this **should include a worse-case scenario.** However, for detailed advice the applicant is advised to discuss the specific requirements of a TA, prior to any application being made, with Cambridgeshire County Council’s Transport Assessment Team. The TA could form part of the Environmental Statement. (My emphasis MS)

...

“The Highway Authority has concerns regarding the impact of the proposed development on the condition of the existing highway network for which it is responsible. The network will be liable to damage from both construction traffic and vehicles accessing the plant once it becomes operational. (My emphasis MS)

...

The Highway Authority advises that Algores Way is adopted up to Britannia Way, it is Cambridgeshire County Council policy that the Authority **does not adopt industrial estate roads.** Beyond this point Fenland District Council are the landowners and would therefore need to be consulted if access is proposed via Algores Way. (My emphasis MS)

...

“**There is a significant omission within the scoping report** with the more strategic projects that the Cambridgeshire and Peterborough Combined Authority (CPCA) are promoting and specifically the A47 upgrade and proposed Wisbech Rail work. These schemes are caught in adopted policy or emerging policy by the CPCA in the draft Local Transport Plan (LTP) (due to be presented to the board in January 2020), Climate Public Expenditure and Institutional Review (CPEIR), Local Industrial Strategy (LIS) etc. **The applicant is therefore advised to contact the CPCA at the earliest opportunity.** (My emphasis MS)

...

“From section 5.3 and 5.4 there seems to be a suggestion that all traffic to and from the development will be solely in an east or westerly direction. No consideration appears to have been given concerning journeys to and from the north of Wisbech. **It is essential** that further work is undertaken once the origins of the waste are known as mentioned in paragraph 5.3.2 including a review of the baseline. (My emphasis MS)

...

“Two other important transport work areas which must be addressed in an Environment Impact Assessment are the **Wisbech Railway project and the A47 duelling proposals**, both of which are being funded by the CPCA and delivered by Cambridgeshire County Council. **It is noted that neither project is mentioned within the traffic and transport section, but it is considered that regard must be had to them.** (My emphasis MS)

...

“The impact of vehicle movements on residents, businesses and educational facilities should be made clear. To divert **500,000 tonnes of waste** to this facility, an estimated calculation has demonstrated this could result in an average of **110 to 150** vehicle movements a day. (Based on waste being transported in **25 tonne bulkers** to the facility, with deliveries being accepted 5 to 7 days a week). Any transport links, within the district, in addition to road haulage should be detailed in the EIA/ES. (My emphasis MS)

...

Chapter 5: Traffic and Transport should also consider the data and findings contained in the Transport and Health Joint Strategic Needs Assessments, particularly links to air quality and use this as part of the baseline assessment. (My emphasis MS)

<https://cambridgeshireinsight.org.uk/jsna/published-joint-strategic-needs-assessments/>

Chapter 6: Noise and Vibration

...

Noise and Vibration Considerations

...

“The proposed allocated residential and industrial developments at Wisbech must be considered, particularly in relation to noise and odour from any activities proposed. In terms of noise, this may include the consideration of environmental noise barriers in the form of bunds or acoustic fence or a combination running continuously along some parts of the site boundary if appropriate. The final height and length of such environmental noise barriers could only be finalised by detailed noise modelling but to be effective it would have to be of such a height to block the direct line of sight to proposed residential property and habitable rooms. However in considering such a barrier constraints such as existing access roads and the presence of surface water attenuation ponds / drainage features will need to be taken into account. (My emphasis MS)

...

Chapter 7: Air Quality

Policy Considerations

“**Table 7.1: This policy requires that waste management development will only be permitted where it can be demonstrated there would be no significant harm to the environment, human health or safety, existing or proposed neighbouring land uses, visual intrusion or loss to residential or other amenities.** (My emphasis MS)

Air Quality Considerations

...

“It is noted that there are only limited mentions of traffic and transport within this chapter, whilst it is appreciated that transport is covered within a separate chapter, the transport effects on local air quality must be fully considered. Further consideration needs to be given

to the air quality impacts from a transport perspective, particularly given the suggestion that the site will be capable of handling **over 500,000 tonnes of residual waste per annum**. (My emphasis MS)

“The adjacent industrial site has a number of different Environmental Permitted Sites (regulated by the Environment Agency and Local Authority). The EIA/ES should detail if the incineration process will result in a cumulative impact on air quality. If a cumulative impact is identified, the EIA/ES should detail how the existing permitted processes will be impacted on and any burdens it will place on them. (My emphasis MS)

“The EIA/ES should consider the impact of the number and type of vehicle movements that the proposed development will have as well as the incineration process. The impact to the existing NO2 AQMA should be considered. (My emphasis MS)

“The scoping report has identified a number of sources of data to establish estimated background pollutant concentrations. The EIA/ES should demonstrate the impact of pollution concentrations if the development was operational. Real time monitoring of background pollution concentrations will be required and can be agreed. (My emphasis MS)

“All stack height calculations should be provided with raw data, including an analysis of wind direction and weather conditions to demonstrate the likely environmental impacts of this proposal. (My emphasis MS)

“The approach proposed in Table 7.1 to comply with the National Planning Policy Framework (NPPF) paragraph 181 on air quality and air quality management areas is supported, namely *“There are four AQMAs in Fenland District Council’s jurisdictional area, including three within Wisbech for nitrogen dioxide, particulate matter and sulphur dioxide. These pollutants will be emitted from the stack (all three pollutants) and from the exhausts of construction and operational traffic. **As such, it is imperative that appropriate mitigation measures are embedded in the design to ensure the Proposed Development does not prevent the achievement of strategic objectives within Fenland District Council’s air quality action plan.**”* (My emphasis MS)

“It is recommended that Public Health England, the technical experts on Energy from Waste Facilities in respect of health impacts, should be included in all future informal and formal consultations and in respect of the Application when submitted. (My emphasis MS)

Chapter 8: Landscape and Visual Policy Considerations

“The document refers to specific parts of the National Planning Statement for Renewable Energy Infrastructure, but does not refer to Fenland’s Policy LP14, which highlights Renewable Energy and the need to assess individually and cumulatively “surrounding landscape, townscape and heritage assets” and “residential and visual amenity”. (My emphasis MS)

Fenland Local Plan identifies policy LP6 and highlights that proposals will be assessed against “Impact on natural and heritage assets” and “Impact in terms of urban/landscape character, and setting of settlements”. (My emphasis MS)

In referring to LP16 of the Fenland Local Plan, the bullets only refer to 2 of the rather more extensive list of applicable criteria. (My emphasis MS)

Cambridgeshire and Peterborough Minerals and Waste Core Strategy 2011 - references are missing to policies CS24: Design of Sustainable Minerals and Waste Management Facilities (which links to the SPD (below); and CS34: Protecting Surrounding Uses which refers to visual intrusion and residential or other amenity. (My emphasis MS)

Whilst it is acknowledged that this is an energy proposal, it is still considered that The Location and Design of Waste Management Facilities SPD for Cambridgeshire and Peterborough is relevant to the project and needs to be taken into account, **for example in respect to location, design, character, distinctiveness, use of materials, lighting, boundaries and planting and the consequences for landscape and visual impact**. (My emphasis MS)

...

Landscape and Visual Considerations

The highest levels of design, layout and landscape will be required to reduce possible significant landscape and visual effects. (My emphasis MS)

Mitigation measures must be part of the proposed scheme. The Landscape and Visual Impact Assessment (LVIA) must demonstrate how the mitigation proposals have reduced expected negative landscape and visual effects to an acceptable level. (My emphasis MS)

The area to the south of the site is identified in the scoping report as predominantly for business purposes, however the Fenland Local Plan allocation also has potential for around 100 dwellings and this should be referenced. (My emphasis MS)

The LVIA must also consider any likely future baselines different to the existing, and potential Cumulative Landscape and Visual Impacts with other developments in the area.

An assessment must show whether effects are positive or negative, and proposals to mitigate negative effects should be described. (My emphasis MS)

The National Planning Policy Framework (NPPF) – with respect to paragraph 170 of the NPPF, it is important to recognise that all landscapes have a value, regardless of designation. Therefore, it is imperative that the assessment takes into account the value of the landscape and recognises the inherent intrinsic character and beauty of all landscapes, not just that which is designated, applying the principles of box 5.1 GLVIA3, page 84; as well as recognising the factors which contribute to value. (CCC emphasis)

It is not clear whether the development will assess the effects on townscape, which form an important part of landscape, or an ES townscape chapter in their own right.

Lighting effects of the proposed facility needs to be carefully considered and assessed.

Study Area and Zones of Theoretical Visibility (ZTV)

...

The impact of longer range potential impact views outside the 5km study area should be considered and scoped into the EIA/ES to demonstrate **whether there will be any significant visual impact from the height of the chimney stack and overall building height.**

(My emphasis MS)

It is also considered imperative that in considering the landscape and visual impacts that additional significant views should be included from the west of Wisbech.

(My emphasis MS)

...

Viewpoints - Additional viewpoints should be discussed where the site will be visible - long distance footpaths, marinas, nature reserves (where appropriate). The agreed outcome of these discussions should be reflected in the Environmental Impact Assessment and the consequential Environmental Statement. (My emphasis MS)

Whilst the study area shows the main settlement of Wisbech being washed over by the ZTV, it is not made clear but, it is essential that the LVIA also takes into consideration the landscape/townscape impacts of the proposed development, and those of surrounding villages. Policy LP8 in the Fenland Local Plan (and supporting text 4.3.3) makes reference to some of the characteristics that make Wisbech and its context distinctive, whilst Fenland Local Plan Policy LP12 refers to the Rural Areas Development Policy. (My emphasis MS)

...

The limited scope of the ZTV means that the interpretation of the effects that may or may not be significant have not been fully considered. The study and study area needs to be widened to capture a fuller and realistic range of receptors and correctly represent the extent of character effects and effects on visual amenity. The very narrow approach taken thus far, has the consequence of missing some key receptors and elements that are of relevance to the EIA and the landscape and visual effects. (My emphasis MS)

Chapter 9: Historic Environment

...

Paragraph 9.3.1 of the scoping report identifies the size and centering of the study area for direct disturbance of archaeology as 1km from the Main Development Site boundary. Whilst this is sufficient for impacts on surface archaeology at the Main Facility Site **it does not adequately consider the impacts of development at significant depth** e.g. for deep excavations required for construction at the Main Development Site OR development in other areas within the proposed development area e.g. along the Grid Connection Corridor.

(My emphasis MS)

...

Fen development and tidal involvement

...

The scoping report **does not identify any historic assets** including listed buildings and scheduled monuments either on site or in close proximity to the site. Both proposed Heat and Power Connections have HER monument points within their boundaries. See Figure 9.1 (page 242) & Figure 9.3 (page 243) (My emphasis)...

The EIA/ES should include an assessment of the significance of any level of harm which would be caused to the relevant heritage asset and its setting by virtue of the scale and location of the development proposed. (My emphasis MS)

Both Heat and Power Connections have HER monument points within their boundaries. Heat connection passes by listed building, Power has listed building within area Grid Connection Area. See Figure 9.1 (page 242) & Figure 9.3 (page 243). (My emphasis MS)

It is considered that for the avoidance of doubt and for clarity as to the exact impact of the proposed facility it would be expected that any future EIA/ES would include reference to the Wisbech Conservation Area and listed buildings within the Wisbech Conservation Area and provide evidence of visual impact, or lack of, from these designated heritage assets."

(My emphasis MS)

Conclusion

Both the Scoping Report provided by the Applicant, and the Scoping Opinion provided by the 'statutory consultees', are vast documents. This Response to the Scoping Opinion highlights some of the most serious concerns highlighted by PHE and CCC to alert the local community to the possible perils that will impact on their lives should this development gain approval.

Mo Stewart
Retired healthcare professional
Wisbech resident
27th March, 2020