


Agenda Item No:	4	
Committee:	Planning Committee	
Date:	11th August 2021	
Report Title:	<b>Statutory Consultation F/YR21/4002/LACON Energy from Waste (EfW) and Combined Heat &amp; Power (CHP) facility, Algores Way, Wisbech</b>	

## 1 Purpose / Summary

The purpose of this report is to consider the consultation material that has been submitted to the Council in relation to the forthcoming application for an Energy from Waste (EfW) and Combined Heat & Power (CHP) facility and return comments to the applicant.

## 2 Key Issues

The development is of a nature and scale such that it will be determined by the Sec of State through National Strategic Infrastructure Project Process. The Council is a consultee in the process. The consultation is the first statutory consultation in the process. We have been invited to comment on the Preliminary Environmental Information Report produced by the applicant. The Council needs to submit its comments to the applicant by 13th August 2021.

## 3 Recommendation

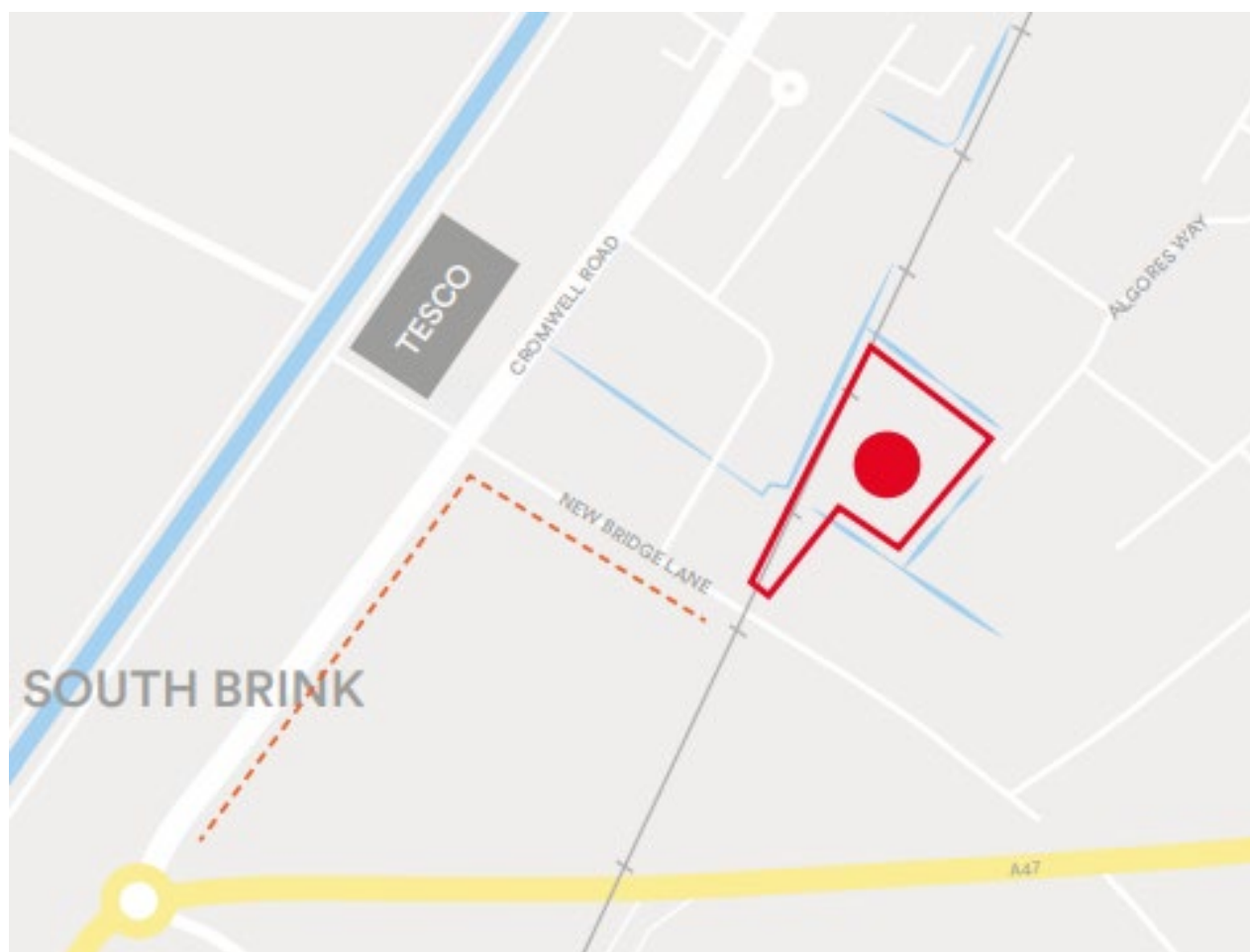
That the comments in section 5 of this reported be submitted to the applicant in response to the consultation.

<b>Wards Affected</b>	All, but in particular all wards in Wisbech. The proposed development is in Medworth ward,
<b>Forward Plan Reference</b>	Not applicable
<b>Portfolio Holder(s)</b>	Cllr Mrs D Laws - Portfolio Holder for Planning Cllrs Seaton - Portfolio Holder for Social Mobility & Heritage Cllr Benney - Portfolio Holder for Economic Growth
<b>Report Originator(s)</b>	Sheila Black & Nick Harding
<b>Contact Officer(s)</b>	Nick Harding, Head of Planning
<b>Background Paper(s)</b>	<a href="https://www.mvv-medworthchp.co.uk/documents">https://www.mvv-medworthchp.co.uk/documents</a>

## 4 Introduction

There is a proposal for an Energy from Waste (EfW) and Combined Heat & Power (CHP) facility to be located in Wisbech. Because the output of the facility is proposed to be in excess of 50MW, the proposal is not one that is determined by the County Council or District Council. Instead, the proposal will be determined by the Secretary of State through the Nationally Significant Infrastructure Projects (NSIPs) process as established under the Planning Act 2008. If the Secretary of State allows the development this will be through a 'Development Consent Order' (DCO). The DCO, as well as 'giving planning permission', can authorise the compulsory purchase of land that is needed in order for the development to be implemented.

The proposed DCO would authorise the construction, operation, maintenance and decommissioning of an Energy from Waste (EfW) Combined Heat and Power (CHP) Facility at the industrial estate, Algores Way, Wisbech, Cambridgeshire (the "Proposed Development"). The Proposed Development also includes a CHP pipeline, a 132kV electrical grid connection and access improvement works. The Proposed Development would be capable of handling up to 625,600 tonnes of waste per annum and aims to generate up to 53MWe of electricity(net) and up to 50MWth of usable steam (heat) energy.



Because of the scale of the proposal, it is subject to the Environmental Impact Assessment Regulations. The aim of an Environmental Impact Assessment is to protect the environment by ensuring that the decision maker, when deciding whether to allow a project to go ahead, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision-making process.

The NSIP process is broken down into the following stages and we are currently at pre-application stage:

**Pre-Application** - The development consent regime is a front-loaded process. This means the development proposal has to be fully scoped and refined before the submission of an application to the Planning Inspectorate. It is at this stage that the applicant must formally consult with all statutory bodies, local authorities, the local community and any affected persons.

**Acceptance** - It is at this point that the Planning Inspectorate moves to the heart of the process. The Application is formally submitted by the applicant to the Planning Inspectorate. The Inspectorate then decides whether all relevant documentation has been submitted to enable the application to proceed. If the application is accepted then the process moves to the next stage.

**Pre-examination** - The applicant publicises that the application has been accepted by the Planning Inspectorate and enable people/organisations to register to get involved in the Examination as Interested Parties. Also, the Planning Inspectorate, an Inspector, or panel of Inspectors, will be appointed as the Examining Authority. A Preliminary Meeting will then be held to discuss procedural issues and the timetable for Examination which will then be published.

**The Examination** - It is at this stage that the Examining Authority examines the application and the Examination must be completed within six months. The Examination is primarily conducted through written representations; however, hearings can also be held. These will normally be conducted in an inquisitorial manner.

**Recommendation and Decision** - During this stage the Examining Authority has three months to write its recommendation and submit it to the Secretary of State. The Secretary of State makes the final decision for all NSIPs. The Secretary of State has three months to make its decision whether or not to grant consent.

**Post Decision** - This provides a six-week window for the applicant, any of the Interested Parties, or indeed anyone else to legally challenge the Secretary of State's decision.

Given the NSIP process as outlined above, although the development is primarily located within Fenland District, the Council is, in effect, a consultee in the process. It should be noted that as the current proposal spans Cambridgeshire and Norfolk there are three other 'host' authorities (Cambridgeshire County Council, Norfolk County Council and the Borough Council of King's Lynn and West Norfolk) involved in this NSIP project. All four 'host' planning authorities have undertaken to work together as far as possible to ensure full scrutiny of this project is undertaken. Cambridgeshire County Council is taking a lead on several work stands given its waste planning function.

On the 23 June 2021 Medworth CHP Ltd sent FDC a formal notification (by special delivery) that our statutory consultation for the proposed development will commence and provided FDC with an opportunity to review and comment on their Preliminary Environmental Impact Report. This statutory consultation exercise is carried out pursuant to section 42 of the Planning Act 2008 ("the Act"). FDC has been identified as a consultee for the purposes of section 42 of the Act and/or Regulation 13 of the EIA Regulations. The consultation period commenced on 28 June 2021 and closes on 13 August 2021.

A Preliminary Environmental Information Report has been produced which contained preliminary information about the likely significant environmental effects of the development together with a non-technical summary of that information. The applicant is currently undertaking further environmental studies and assessment and a full environmental statement will be produced and submitted with the DCO application.

The purpose of the Preliminary Environmental Information Report (PEIR) is for consultees to understand the likely environmental effects of the development and help inform consultee responses.

The consultation material is available to view here:

<https://www.mvv-medworthchp.co.uk/documents>

The documentation covers a wide range of topics including:

- Alternatives to the proposal
- Traffic and Transport
- Noise and Vibration
- Air Quality
- Landscape and Visual Impact
- Historic Environment
- Biodiversity
- Hydrology
- Geology
- Climate Change
- Socio Economic Impacts
- Health

The following internal consultees have been identified to comment on the PEIR:

Fenland Transport Team

Environmental and Health Team

Conservation Officer

Business and Economy Team

Valuation and Estates Team

Wildlife Officer PCC

As the work on the potential impacts of the proposal are still being worked on by the applicant, FDC are making a technical response to identify any gaps or shortcomings in the information gathered so far. This approach does not weaken the position of the Council in its ability to object to the proposal in due course should this be the view of the Council's Planning Committee at the next stage of the consultation process.

## **5 CONSULTATION RESPONSES**

### **i) Fenland Transportation Team**

In order for the Fenland Transport Team to make meaningful comments, it is considered that they will need to see the detail in the Transport Assessment. Whilst the methodology and process for the transport work seems to be in order from a governance and highway authority perspective, it is the details contained therein that is needed to fully understand the impacts. Concerns are raised about the levels of vehicles on routes that already have high volumes of traffic which is also likely to lead to impacts on air quality as well.

However, the following comments are made:

- a) It is noted that there has been significant discussion with the Local Highway Authorities and Highways England in respect of methodology and process. It is expected that such consultation will continue throughout the whole process. It is all noted that comments made by Cambridgeshire County Council in their scoping note response are being considered/addressed.
- b) The Travel Plan, the Public Rights of Way Management Plan and the Transport Assessment will all be prepared for the DCO application. It is essential for us to review and comment upon these documents in order to more fully understand the impact(s) of this proposed development.
- c) The scope of the construction period sets out use of New Bridge Lane, Weasenham Lane, Elm High Road, A47 and Churchill Road. Whilst it is acknowledged that these roads are primary routes into Wisbech from the south, they are also busy and often congested routes. The construction phase shows significant levels of traffic including HGVs at certain times. There is concern about the possible impacts of this additional traffic. A 36-month construction phase is a significant period of time with such additional traffic. Further information including up to date traffic data/surveys and a full transport assessment and travel plan are needed to better understand the full impacts of any proposed construction phase and also operational phase impacts.
- d) The suggestion made by Cambridgeshire County Council in their scoping note comments about not routing HGVs down Elm High Road due to residential development in the vicinity is supported. It is noted that MVV has now accepted this proposal. This decision does though place greater emphasis on traffic along Cromwell Road. The Wisbech Area Transport Study modelling work highlighted significant issues and the need to upgrade Cromwell Road in future years. This includes the area between A47/Cromwell Road roundabout and New Bridge Lane. It is suggested that a more detailed assessment of the impact of this proposed development on Cromwell Road and including the entrance to New Bridge Lane is needed as part of the transport assessment.
- e) Regarding preferred options it is noted that the development is suggesting upgrades to New Bridge Lane. Cambridgeshire County Council has stated that their preference is through the use of Algores Way. Both options need to be assessed in more detail to fully understand any impacts. A proposal to route down Algores Way will also impact Weasenham Lane another busy route providing an opportunity for east – west travel. It is important to understand the impact of any such route on Weasenham Lane. New Bridge Lane is narrow and it is suggested that some upgrades would probably be needed should this be the preferred option. A detailed assessment will be needed on this also to clarify the impact of any upgrades and whether this is enough to accommodate the proposed volumes of traffic to and from the site.

**ii) Fenland Environmental Health Team**

The EH team reviewed the following Chapters of the Preliminary Environmental Information Report (PEIR) - as accessed via the [MVV Medworth Energy From Waste CHP Facility | Wisbech, UK \(mvv-medworthchp.co.uk\)](https://www.mvv-medworthchp.co.uk) link on 7th July 2021 :

Chapter 1 – Introduction (Final Version Dated June 2021)

Chapter 3 – Description of the Proposed Development (Final Version Dated June 2021)

Chapter 7 – Noise and Vibration (Final Version Dated June 2021)

Chapter 8 – Air Quality (Final Version Dated June 2021)

and following a meeting with representatives from MWV and Wood Group on 23 July 2021 make the following comments:

Noise

Chapter 7 – Noise and Vibration

The following comment relates to page 12 of Chapter 7 and in particular the comment is in relation to the Control of Noise at Work Regs 2005 which the EH team considers are not relevant in this context as set out below:

As discussed with Patrick Hoyle and Giles Hine on 23rd July 2021, The Control of Noise at Work Regulations 2005 are intended to ensure workers hearing is protected from noisy activities at their place of work - not to assess potential noise impacts from an external noise source at industrial /commercial receptors.

These regulations are not relevant in this context.

If noise impacts are to be assessed at nearby industrial / commercial receptors, it would be more appropriate to consider a hybrid approach using BS 4142 and the application of relevant limits as prescribed by the World Health Organisation - and / or BS 8233.

It is acknowledged that BS 4142 does not apply to industrial / commercial receptors - however, in the absence of any other specific guidance, the hybrid approach mentioned above would provide an assessment which is as representative as possible in accordance with established guidance and limits.

The following recommendation is to include a further British Standard in the list contained within Table 7.7. on page 19:

Table 7.7. - As discussed with Patrick Hoyle and Giles Hine on 23rd July 2021, confirmation required that "BS 8233:2014 - Guidance on Sound Insulation and Noise Reduction" should be added to this list.

Page 21 of the document states that construction noise will be assessed under DMRB LA 111 and the EH team has agreed with MWV that Construction Noise and Vibration will be assessed in accordance with BS5228 as set out below:

Para 7.4.3 - Whilst DMRB LA 111 sets out requirements for assessing and reporting effects of highways noise and vibration from construction, operation and maintenance

projects, the relevance of the "Study Area" content of this guidance was discussed in detail with Patrick Hoyle and Giles Hine on 23rd July 2021 - and is acceptable.

For the avoidance of doubt, Patrick and Giles also confirmed that the Construction Noise and Vibration aspects of the project would be assessed in accordance with BS5228 - and not DMRB LA 111.

Page 24 of the document contains a statement relating to outstanding baseline requirements for further noise and vibration assessments and the EH team consider further content should be added to that note as set out below:

Table 7.9 - Confirmation to be inserted that author has reviewed the joint ANC / IoA Guidance note re: covid and that that the approach is consistent with the content of that guidance note.

Fenland District Council hold current traffic data as part of wider work currently being undertaken in relation to establishing what is the likely to be the "new normal" following the pandemic - and this data can be requested by the Author to inform future baseline assessment.

Page 25 and 26 of the documents contains statements relating to desk-based reviews of the Grid connection and the EH team make the following comments:

Paras. 7.5.7; 7.5.8 and 7.5.9 - The reference here to "desk-based review" implies that a formal review has been undertaken.

Discussion with Patrick Hoyle and Giles Hine on 23rd July 2021 confirmed that no formal review has been undertaken - and to avoid further confusion, this section would be better worded to make it clear that this was a consideration of relevant data available - rather than an actual formal review.

In Table 7.18 on page 38 'Summary of the embedded environmental measures and how these influence the noise and vibration assessment' – the phrase 'Where possible' is used and the EH Team considers that this phrase should be reworded as set out below:

Table 7.18 - As discussed with Tim Marks on 23rd July 2021, the words "where possible" are understood to mean "in the event of an emergency" - as the capability for undertaking activities outside of these hours if needed is provided in the following sentence stating that "works will be agreed in advance with the relevant Planning Authorities".

This would benefit from being re-worded to provide greater clarity.

Pages 39, 41 and 43 of the document states that construction noise will be assessed under DMRB LA 111 and the EH team has agreed with MWV that Construction Noise and Vibration will be assessed in accordance with BS5228 as set out below:

Paras. 7.8.3; 7.8.11; 7.8.22 - As discussed with Patrick Hoyle and Giles Hine on 23rd July 2021, The Control of Noise at Work Regulations 2005 are intended to ensure workers hearing is protected from noisy activities at their place of work - not to assess potential noise impacts from an external noise source at industrial /commercial receptors.

These regulations are not relevant in this context.

If noise impacts are to be assessed at nearby industrial / commercial receptors, it would be more appropriate to consider a hybrid approach using BS 4142 and the application of relevant limits as prescribed by the World Health Organisation - and / or BS 8233.

It is acknowledged that BS 4142 does not apply to industrial / commercial receptors - however, in the absence of any other specific guidance, the hybrid approach mentioned above would provide an assessment which is as representative as possible in accordance with established guidance and limits.

Page 3 of the Technical Report relates to Proposed Noise Surveys and para. 2.1.3, 2.1.13 and in particular relates to backup locations for monitoring locations and a query has been raised by the EH team as below:

Para. 2.1.3 - Backup / alternative monitoring locations have been identified for some, but not all of the proposed monitoring locations – with no apparent rationale behind why some but not others.

It would appear logical to provide alternative monitoring locations to all, to ensure potential delays associated with granting of permission are avoided during future development of the project.

Para. 2.1.13 - Backup / alternative monitoring locations have been identified for some, but not all of the proposed monitoring locations – with no apparent rationale behind why some but not others.

It would appear logical to provide alternative monitoring locations to all, to ensure potential delays associated with granting of permission are avoided during future development of the project.

In addition, level of detail provided re ST6, ST8 location description is not consistent with other monitoring locations proposed - this should be expanded to provide greater clarity.

To be amended to read :



"Noise measurements will be undertaken by personnel who hold the Institute of Acoustics Certificate of Competence in Environmental Noise Monitoring, as a minimum.

Subsequent analysis and reporting of this data shall be overseen and peer reviewed by personnel who hold corporate Membership of the Institute of Acoustics (MloA) "

The following paragraphs on page 6 of the Technical Report relate to Data Collection Methodology and in particular noise measurements

Para. 2.2.1 and 2.2.3 - Change to :

"Noise measurements will be undertaken in accordance with the relevant British Standards (including BS 4142:2014+A1:2019 Methods of rating and assessing industrial and commercial sound, BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise5, and BS 7445 – Description and Measurement of Environmental Noise).

Meteorological logging stations will be installed over the survey period at locations representative of the long-term monitoring sites which will log wind speed, wind direction and precipitation. This information will be used in the analysis of the noise data to ensure that only data collected under appropriate and representative weather conditions is included in any assessment."

Para. 2.2.5 on page 7 of the Technical Report is recommended to be reworded as follows:

Para. 2.2.5 - Change to "for not less than 5 days (including a weekend), at relevant locations as agreed in advance in writing with the host Authorities".

Para. 2.3.1 on page 7 of the Technical Report is recommended to be reworded as follows:

Para. 2.3.1 - Replace with "The reporting of all data will be undertaken in accordance with the relevant technical guidance."

Para. 2.4.2 on page 8 of the Technical Report is recommended to be include additional text as set out below:

Para. 2.4.2 - Change to "agreed in writing with the host Authorities in advance"

The EH Officer has concluded in respect of Chapter 7 as below:

I would recommend that the applicant is requested to undertake the amendments as suggested in the report – all of which I discussed with representatives from MWV and Wood Group on 23rd July 2021.

Air Quality

Chapter 8 - Air Quality

The following comment from the EH Officer relates to Chapter 8 of the PEIR:

In relation to air quality, I note the comments submitted by Air Quality Consultants Ltd (AQC) in their July 2021 document entitled “Air Quality Review: Medworth Energy from Waste CHP Facility – Review of Preliminary Environmental Information”.

Notwithstanding these comments, of particular interest to Fenland District Council is the potential for dust / odour emissions from the proposed facility to result in complaints being received concerning alleged statutory nuisance.

In relation to Chapter 8 of the PEIR, it is noted that:

Appendix 1A of Chapter 1 confirms the relevant competencies of the author of the report:

“normal” operating conditions inherently includes operational processes which would mitigate the risks of any potential dust / odour emissions. These processes are detailed in Chapter 3 of the PEIR - and also 8.6.44 and 8.6.45 – resulting in dust / odour being scoped out of this assessment:

the potential for dust / odour emissions would be regulated further through the enforcement of the Environmental Permit mentioned in 8.6.45 – including the submission of an Odour Management Plan, as a requirement of the Environmental Permit:

dust / odour will be assessed further in the context of “abnormal” operations

In addition to the above, discussions were held with representatives from MVV and Wood Group on 23rd July 2021 - relating to the potential external storage of odorous material. These discussions confirmed that, even in “abnormal” operations, there would be no need to store material outside - as the internal storage capacity is more than sufficient.

Notwithstanding content which might be required by the Environment Agency (or to demonstrate compliance with the relevant technical guidance), it is recommended that the Odour Management Plan should include:

details of the operational/mitigation measures in place during "normal" as well as "abnormal" operating conditions:

confirmation that all vehicles delivering / removing material from the site will be sheeted at all times:

details of how any complaints received by the operator will be recorded and investigated

Again, this was all discussed with representatives from MVV and Wood Group on 23rd July 2021.

The comments above do not result in an objection to the PEIR but more importantly sets out how the document should be improved and amended to ensure the proper consideration of noise and air quality during the construction/operation of the Plant.

### iii) **Fenland Conservation Officer**

The Historic Environment Chapter appears to be comprehensive and contains a thorough and realistic assessment of the potential impact on the setting of identified heritage assets within Fenland, especially given the concentration of existing industrial units and factories in this area.

However, there are two points about which need clarification. First is an understanding of what infrastructure or building will be constructed at the termination of the CHP Connection. This site is directly behind the Nestle Purina factory off Coalwharf Road and therefore much closer to any affected heritage assets than the main plant site off New Bridge Road/Algores Way.

This site and its impacts need clarifying. Indeed, at this stage there are no clear indications of the visual appearance of the main plant building, or assessment of the height of the chimney against existing buildings, in order to begin to assess the visual impact on the heritage assets.

Secondly, the maps indicating the ZTVs are not entirely clear, or they do not reflect what is purported from the document in terms of visibility. Large areas of visibility of both the chimney and the building appear to be indicated from the north of Wisbech Conservation Area, views of the Chimney from Bowthorpe Conservation Area) (Figure 10.3) as well as views of the chimney and building from the east of Elm Conservation Area (Figure 10.4), and yet the conclusion put forward in the document is that the visual impact will be virtually negligible from within these areas. It should not follow therefore, that there are large areas of visibility from outside these conservation area boundaries. Perhaps the figures showing ZTV could indicate a level of additional impact from the proposal, given the context of industrial buildings mentioned above.

A series of photo montages, of key vantage/viewpoints would help clarify the impact of the views towards the proposed development site, from affected assets.

One further point to consider, is that the Historic Environment chapter does not appear to address in any way, the impacts of smell, noise or other pollution on the settings of identified assets. These intangible side effects can have as much, if not more impact, than a visual impact. It is understood that these elements have been addressed under other chapters, but a summary should be included in this chapter, in terms of their impact on the setting of heritage assets.

#### iv) Fenland Business & Economy Team

##### Medworth Statutory Consultation Booklet

Pg9 – shows the proposed site contained wholly within the ownership of the existing landowner/site promoter, yet on the subsequent pages of this document (pg10,12-15), the site proposal includes land within the ownership of Fenland District Council (infill section to the south-eastern corner) – There is no intention or commitment from Fenland District Council to willingly include land it owns within the proposed scheme – this is misleading and suggests that the land ownership is already assembled in order to deliver this proposal, it is not.

Pg10-11 – the massing of the proposed development is incongruous with the surrounding built environment & landscape. The proposed built mass is enormous and does not sit comfortably when viewed from any of the surrounding landscape angles. The proposed chimneys are visually imposing and are likely to be viewed from many miles away. The chimneys have a significant negative impact on the characteristics of the surrounding fen landscape.

Pg12 – the potential impact from installing 'CHP' infrastructure along and adjacent to the former Wisbech to March rail track route is likely to render the re-opening of this line impossible. Despite assurances from the consultation booklet, working within and alongside any current 'live' rail infrastructure (in use or otherwise – the track bed here is considered a 'live' asset) is littered with challenges. It is expected that Network Rail would not support any activity in such close proximity to the railway asset.

Pg13 – the proposed routes to the electricity sub-station at Walpole would further pepper the landscape with underground cables and a significant 'run' of overhead power lines. The open fen countryside and landscape, famed for its broad horizons, would be further impacted visually by obtrusive overhead power lines.

Pg14 – shows a proposed layout plan, which again includes land in the ownership of Fenland District Council. There is no agreement for Fenland District Council's land to be included within the proposed development. This seems to demonstrate that the scheme cannot be accommodated on the existing site footprint as assembled by the site promoter. The access onto New Bridge Lane at this location is limited by the width of the highway and further restricted by the closed level crossing adjacent to the site entrance.

Pg15 – a further image of the access land, which shows additional Fenland District Council land required for the scheme – this is the third different plan showing the extent of the site footprint. Within the document, the succession of land requirements grows 'page by page'. To repeat earlier comments, no Fenland District Council land has been approved for inclusion within this scheme and the fact that it is shown that way is both mis-leading and disingenuous.

Pg16-17 – where will the waste come from? It could be from west/mid Wales to the south coast of England. With this proposal, Wisbech risks becoming a 'dumping ground' for waste materials. In a lucrative waste disposal business, other local authorities, public and private businesses will be paying handsomely to have their waste products disposed of. The increased vehicle movements bringing waste products into Wisbech from the surrounding counties will have a major impact on the air quality and general quality of life of people living in the Town, that is even before the processing of the waste, which will generate pollutants which will be blown into the surrounding environment.

Pg20 – In use the plant will generate an estimated 362 large waste vehicle movements per day, between the hours of 7:00am and 8:00pm, that is an average of approximately

28 vehicle movements an hour or approximately 1 vehicle movement every 2 minutes. A plant of this scale, being served by such a volume of waste needs connections directly onto major 'A' road, not via a local road network as is proposed. The volumes of traffic generated will produce significant pollutants.

Pg22 – Community benefits? It is not considered that the proposal benefits anybody from the local community. Even a sizeable S.106 contribution could not 'make good' on the permanent and ongoing disadvantages of having this plant located at the proposed location in Wisbech. The plant will make little positive impact on the local community, it will generate few jobs, whilst processing the waste of others from many miles away and generate significant profits for the operators, whilst giving virtually nothing back to the community it purports to protect.

### Chapter 3 Description of the Proposed Development Figures

Pg29 – Shows the proposed layout of temporary storage, office and parking facilities on adjacent, Fenland District Council owned land (east of the main site). Fenland District Council object to the use of its land being used in support of this application. There is no intention or commitment from Fenland District Council to willingly include land it owns to aid the proposed scheme – this is misleading and suggests that the land required to facilitate the construction of this development is already assembled, it is not.

### Chapter 6 Traffic and Transport Figures

General observation - The surrounding road infrastructure serving the proposed site is not fit for purpose. Additional heavy goods vehicle movements are likely to cause significant disruption to the surrounding road network, mixing additional freight traffic with commuter/domestic traffic and the proposed heavy traffic is likely to do untold damage to the existing highways in the general area. It is also likely to cause significant disruption to the surrounding road network and to the operations of the existing local businesses including receiving and sending goods and materials and the ability of employees accessing their places of work. This proposal is simply in the wrong place – too close to existing homes, schools and businesses and too remote from the grid connection that it hopes to serve.

Pg29 – The plan on this page shows the proposed access into the site from AL gores Way. AL gores Way is a private roadway at this location, owned by Fenland District Council, to repeat earlier objections, there is no intention or commitment from Fenland District Council to willingly include land it owns to aid the proposed scheme.

### Chapter 9 Landscape and Visual Figures

Please see my comments above

### Tourism and Recreation

Wisbech attracts visitors who value its culture, outstanding heritage and the built environment. The proposal detracts from this offer both in terms of its negative visual aspect and perceived risk to health and hence would negatively impact upon the number of visitors.

## **V) Fenland Wildlife Officer**

It should be noted that as of 23 July 2021 the ecological surveys for the proposed development had not been completed and therefore it is not possible to fully comment on whether the proposed avoidance, mitigation and compensation contained within the PEIR aligns with National and Local Policies.

Previously on 25 March 2021 a meeting was held between the LPA stakeholders and Medworth CHP Ltd ecological representation to inform Chapter 11: Biodiversity for the PEIR and the content of these discussions have been included within table 11A.1 and 11A.2 and responded to appropriately.

The comments of the Wildlife Officer are set out below:

Overall, the PEIR is well constructed and extensive in its scope covering every aspect of the proposal in details and broken into relevant partitions. At this moment in time with the survey work still ongoing and all comments made appropriately responded to there is no further comment I wish to make as I am unable to determine the impacts of the proposal.

## **6 CONCLUSION**

The above comments are from Fenland District Council internal consultees following a consultation exercise to gain their views on the contents of the Preliminary Environmental Impact Report which will form part of the MWV's submission of the Development Consent Order to the Planning Inspectorate.

As set out in the introduction above, the response of Fenland District Council to the applicant will form part of the pre-application stage of the overall process whereby the applicant (MVV) has a duty to formally consult with all statutory bodies, local authorities, the local community and any affected persons.

Therefore, with the Planning Committee's agreement, the above responses will be forwarded to the applicant to comply with the pre-application stage of the statutory consultation process.