

Rookery Pit South Project Team  
Covanta, Unit 7 Water End Barns  
Water End, Eversholt  
Milton Keynes MK17 9EA

30<sup>th</sup> March 2010

Dear Sir / Madam

**Proposed Rookery South Resource Recovery Facility –**

**Preliminary Environmental Report**

The Marston Moreteyne Action Group (MMAG) are writing to comment on the above report. MMAG is a non political group of volunteers who have combined together to oppose inappropriate development which assaults the rural nature of our distinct communities of which Covanta's proposal for Rookery Pit south is one.

MMAG believes the Preliminary Environmental Report is deficient on the following respects:

**1. Proposal Overview**

The project proposes to provide an important source of renewable energy (1.1.2.). In July 2009 the Government published the UK Low Carbon Transition Plan: National strategy for climate and energy pursuant to Sections 12 & 14 of the Climate Change Act 2008. The transition plan aims to deliver emission cuts of 18% on 2008 levels by 2020. This includes getting 40% of our electricity from low carbon sources by 2020 and producing around 30% of our electricity from renewable by 2020 by substantially increasing the requirement for electricity suppliers to sell renewable energy.

Precisely how will the Covanta proposal contribute to achieving the targets arising from the carbon transition plan and Climate Change Act?

The project proposes to export electricity serving the energy needs of 82,500 homes, broadly equivalent to the housing energy needs of Bedford and the Marston Vale. What price would be charged for this electricity and how is this figure arrived at?

Covanta (1.2.2.) is described as offering 'high quality safe and efficient solutions' for the treatment of waste, mostly in the United States. How many indictments, citations, arraignments and legal improvement notices have been served on Covanta to date by environmental agencies?

## **2. Proposed Application Site Location**

The proposed site (2.2.1.) is adjacent to the Marston Vale Millennium Country Park which aims to reforest the Marston Vale.

Does Covanta consider Rookery Pit South to be the 'best' site for situating the project? Does Covanta regard Rookery Pit South as 'greenfield land'? Have Covanta secured to date contracts for either waste disposal and/or transmission of combined heat and power within the catchment area designated for the project?

In discussion with National Institute for Research into Aquatic Habitats (NIRAH) (2.6.66) who on behalf of NIRAH has Covanta been in contact with?

Are Covanta aware of any other proposals for Rookery Pit South which might include additional energy from waste projects and storage / landfill of hazardous waste (2.6.78) permanently and have they weighed the cumulative environmental impact? What account did Covanta take of the proximity principle that waste should not be exported across local authority boundaries thus encouraging local responsibility for waste disposal and renewal emphasis on recycling?

## **3. Design Development & Consideration of Alternatives**

What consideration did Covanta give to alternative technologies such as Advanced Thermal Treatment or Mechanical Biological Treatment (3.2.3.) and recycling prior to mass burn?

What were the precise locations of the original 325 sites considered, the 52 sites considered potentially appropriate, leading to the 11 sites eventually shortlisted (3.4.12.). Why in the photomontages are there no views from the village of Marston Moreteyne?

## **5. Transport Access**

The primary and secondary catchment areas produce residual waste amounting to 2 million tonnes. The project proposes to process a nominal maximum of 585,000 tonnes with transport movements limited to between 05.00 to 23.00. Why is

Covanta therefore also seeking future operational flexibility beyond these hours when it will have no additional capacity?

## **6 Air Quality & Human Health**

How can Covanta predict with any degree of precision what chemicals, pollutants and emissions (and in what quantity) will be discharged by the project when no attempt will be made to sift the material designated for incineration?

Will these discharges be measured continuously throughout the year and by whom?

Has Covanta discharged from any other plant it operates dioxins, mercury, hydrochloric acid, lead, nickel, sulphuric acid or particulate matter in quantities in excess of those predicated in Appendix F?

## **7. Noise**

Within the study area will the project generate noise where presently there is silence?

## **8. Landscape and Visual**

In short-listing sites what weight was given to visual impact? If scored on this factor alone where would Rookery Pit South sit relative to the other 52 considered suitable?

## **9. Cultural Heritage**

The closest (9.6.32.) of the four medieval churches to Rookery Pit South is St. Mary, Marston Moreteyne, 1.5 km to the west. Contrary to the statement in the PER the tall chimney of the proposed facility will appear as a backdrop and clearly visible from the churchyard and walkway through the churchyard to and from the village.

## **10. Ecology and Nature Conservation**

During the winter the site could be host to large numbers of wildfowl, gulls and starling. The RSPB has stated that of note are the significant roosting / feeding / refuge movements of the tufted duck, Pochard, Wigeon, Gadwall and Teal to and from the Pillange Lake, Marston Vale Millennium Country Park, Stewartby Lake and Brogborough Lake. Information held by the RSPB on the breeding bird assemblage indicates that Garganey has bred in the park historically and Pochard also potentially breeds. Cetti's Warbler bred for the first time in 2009 (only the 2<sup>nd</sup> breeding attempt

ever in Bedfordshire) and Bearded Tit may breed in the reed-beds. Water Rails certainly breed on the site – another scarce County bird.

Since clay extractions ceased Rookery Pit, situated adjacent to the Millennium Country Park is now an ecologically integrated and co-joined wild life site.

Rookery Pit has been transformed into an important wildlife site with reed-beds, pools and large stretches of open water. Rookery Pit is one of the best bird sites in Bedfordshire. Bittern and Waterfowl use it in winter and Garganey, Ringed Plover, Lapwing, Snipe and important species breed there in the summer and are likely to move between sites. The proposal will lead to direct and indirect habitat loss.

### **13. Socio Economics**

What effect does Covanta estimate the project will have on existing property prices?

What effect does Covanta believe that the proposal will have on the stated desire of local people and the local MP for the area to be part of a leisure destination?

What guarantees are there that the jobs, ongoing or in consideration, will be offered to local people?

**In conclusion, it is the considered view of MMAG that the:**

1. visual impact,
2. loss of wildlife habitat in an area that has naturally regenerated over many years,
3. predicted traffic levels with associated noise and dust pollution,
4. proposal to draw huge proportions of the waste processed by the plant from surrounding counties (at odds with the minerals and waste local plans),
5. fact incineration discourages recycling and contributes significantly to atmospheric CO<sub>2</sub>

Renders this proposal the wrong solution to dealing with Bedfordshire waste and in the wrong location.

**Hugh Roberts, Chair, MMAG**

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