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Principal Minerals & Waste Planning Officer
Shared Service for Central Bedfordshire and Bedford Borough Councils
Central Bedfordshire Council, Priory House, Monks Walk
Chicksands, Shefford SG17 5TG

20 August 2010

Dear Susan,

Covanta Resource Recovery Facility Proposal at Rookery South Pit, Bedfordshire - Local Impact Report

The Marston Moreteyne Action Group (MMAG) are writing to contribute to the Local Impact Report (LIR). MMAG - who are already registered as stakeholders with the IPC in regard to this proposal - are a group of volunteers committed to sustainable development within and around the Parish of Marston Moreteyne and as such are opposed to the Covanta EfW proposal. We are also members of the Covanta Community Liaison Panel and recently had the benefit of your very informative exposition to the Marston Moreteyne Parish Council of what an LIR could involve. Whilst we appreciate an LIR is something completely new to the planning process and there is no fixed format or content for a LIR provided it falls within the general guidance published by the IPC we have taken as our headings the topic areas suggested in your recent note to Parish Councils.

(A) Site description and surroundings/location

- 1) The proposed site is adjacent to the Marston Vale Millennium Country Park – a primary purpose of which is to reforest the Marston Vale. An oversized Energy from Waste plant is inimical to that purpose.
- 2) Since clay extractions ceased Rookery Pit, situated adjacent to the Millennium Country Park is now an ecologically integrated and co-joined wild life site.
- 3) The village of Marston Moreteyne and surrounding settlements such as Stewartby, Houghton Conquest are all within a rural landscape populated by residents who wish to preserve their rural way of life.
- 4) The Covanta proposal would be a retrograde step ecologically and ultimately lead to the industrialisation of Rookery Pit South. Although the Covanta proposal is indeed large it would at the beginning only occupy 14 ha of Rookery South Pit which is an area of approximately 95 ha.

(B) Details of the proposal

- 1) The sheer size of the building will dominate the skyline - 75% of which will be visible above the existing edge of Rookery Pit.
- 2) The Main building would be roughly the height of the Cardington hangers.
- 3) The buildings within the site will abut the Bedford to Bletchley railway line right by the footpaths of the Country Park.
- 4) The Covanta Rookery Pit stack would be 115 metres high in comparison with the brickworks chimneys of 80 metres).
- 5) The plume will accentuate the stack visibility
- 6) Reference to emissions from the chimneys at the former brickworks on the surrounding area is of no relevance to those who have moved into the area since the brickworks ceased.
- 7) Residents recognise there is little that can be done to blend the proposal into the landscape as the machinery within the plant dictates plant size and design and there is little appetite for attempting to disguise the incinerator to look like a brickwork chimney.
- 8) There is a lack of clarity about what will come out of an incinerator's chimney and long term health implications – the experts always tell you it's safe at the beginning! Residents are concerned of reports that Covanta, an American company has been served legal improvement notices on its plants in the USA.

(C) Relevant planning history and any issues arising

- 1) The fundamental issue is residents want a rest from dealing with waste from beyond Bedfordshire.

(D) Relevant development plan policies, supplementary planning guidance or documents, development briefs or approved master plans and an appraisal of their relationship and relevance to the proposals.

- 1) The Covanta proposal refers to the site being located within the Northern Marston Vale Growth area – a planning term which appears in the Milton Keynes South Midlands Sub Regional Growth Strategy as part of the East of England Plan. The legal requirement for Regional Strategies will be abolished through the ‘Localism Bill’ that the Coalition Government is introducing in the current Parliamentary session. In order to avoid a period of uncertainty over planning policy until the legislation is enacted an order was laid in parliament on 6th July 2010 – which revoked Regional Strategies with immediate effect. This means that much of the socio-economic justification for the Covanta proposal in terms of future housing projections and the waste that arises has ceased to exist. The DCLG has said planning authorities should treat as a material fact the intention to abolish regional strategies when considering planning applications.
- 2) MMAG promotes local responsibility in the collection and disposal of waste – the proximity principle – unless local authorities freely combine to form Joint Waste Authorities as defined by the Local Government and Public Involvement in Health Act 2007. Covanta contend that Policy Planning Statement 10 overrides attempts to deal with waste locally and that national policy sets no limitation on treatment facilities recovering benefit from waste and restrains the siting of disposal facilities simply to the nearest appropriate location. A fundamental question is whether, either in national or regional guidance there is permission for one local authority to discharge its responsibility for waste management by entering into an agreement with a private contractor to build a plant for the sole management of that authority’s waste in another local authority’s area.
- 3) Covanta propose to provide an important source of renewable energy. In July 2009 the then 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. It is not explained precisely how the Covanta proposal will contribute to achieving the targets arising from the carbon transition plan and Climate Change Act.
- 4) 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. It has never been explained how residents will directly benefit from this green electricity and how this figure of 82,500 is arrived at. Covanta either exaggerate their electricity generating credentials or have discovered how energy from waste can generate more electricity than fossil fuels. The operator of Drax, Britain’s biggest power station has insisted it would be technically and economically feasible to switch the plant’s 4GW of generation capacity from coal to biomass by the 2020s. DRAX supplies 7% of total UK electricity production and to 1.4million homes. Currently, Drax is scheduled to have the capability to deliver 500MW of dedicated biomass co-firing at the power plant in 2010 and has announced plans to build three new 300MW biomass plants. The Covanta plant has the capacity to produce 65MW of which 15 MW is consumed by the plant itself – so in the grand scheme of things the Covanta contribution would be negligible.

(E) Relevant development proposals under consideration or granted permission but not commenced or completed

- 1) The BEaR Project is currently evaluating the first stage of the tender process so they can short-list the bidders to come forward with solutions that will best meet Central Bedfordshire's needs.
- 2) On August 17th Central Bedfordshire Council endorsed plans that will offer an improved and more efficient waste management service for the future. Bidders competing for the main waste treatment contract will be required to put forward proposals for the following additional services: (a) Re-develop the Household Waste Recycling Centres at Ampthill, Biggleswade and Leighton Buzzard and re-locate the Dunstable site, (b) Provide gritting salt storage barns in strategic locations, (c) Provide a Waste Transfer Station so that various types of waste can be bulked up before being sent for treatment and (d) Provide for the treatment of organic waste in their main proposal.
- 3) The approved services all offer clear benefits and the delivery of an integrated contract will ensure cost savings are made. Further announcements, related to the waste tender are expected to be made in October 2010.

(F) Local area characteristics such as urban and landscape qualities and nature conservation sites

- 1) The sheer size of the Covanta plant will have a major impact on the visual amenity of the area. The site was always considered to lie within an area of great landscape value and whilst the weight attributed to this definition may have changed the sites relationship to some of the best panoramic views in Central Bedfordshire have not. It will detrimentally affect the views from the Vale to the surrounding Greensand Ridge and the panoramic views from the ridge across the entire Vale, especially those seen from Ampthill Park, will be materially impaired.
- 2) During the winter the site is 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 2nd 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. 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.
- 3) Above the Marston Vale there is the meteorological phenomenon of temperature inversions – on still days emissions linger in the atmosphere immediately above the Vale and eventually drop into the Vale. When inversion is not occurring the prevailing wind is south westerly. Whilst emissions from the stack at any one point in time may be within environmental and health guidelines there is serious concern that there will be a cumulative impact over the 30 year + life cycle of the plant either within the Marston Vale and/or Bedford and Kempston.
- 4) There will also be permanent loss of night sky with severe light pollution from a site operating 24/7.

(G) Local transport patterns and issues

- 1) Covanta's initially suggested vehicle movements at 300 lorries and 150 cars. This has since been amended to 900 vehicle movements a day (450 lorries) – arriving and departing between 5am and 11pm 6 days a week and 7 days a week on Bank Holiday weekends. The ongoing disturbance to the the local community will be immense.
- 2) The new A421 was designed to cope with existing traffic problems and some elements of growth in Bedford Borough. The volume of lorry and associated traffic for a large scale industrial area will be beyond the predicted capacity of the road.
- 3) The Covanta proposal is that all rubbish will be delivered by road, despite the fact that Rookery Pit lies between two rail systems. The transportation of upwards of 585,000 tonnes of rubbish per year will take place along the de-trunked old A421. These movements can take place between 0500 and 2300 hours 365 days a year and will have a negative impact on the residents of the village.
- 4) Much of the waste to be processed at the plant is to be transported by road using HGVs and many of these HGVs to and from the proposed major customer will use the new M1 Junction 13. A transport presentation to the Covanta Community Liaison Panel gave no consideration of the impact of this increased traffic on Junction 13.
- 5) Evidence submitted by the Highways Agency during the Public Inquiry into the duelling of the A421 from Bedford to J13 indicated that the new junction layout would at peak times have just sufficient capacity to handle the anticipated peak traffic flows, excluding the projected traffic from the Covanta site. Further the adequate functioning of the new J13 is dependent on the further duelling of the A421 from J13 to Milton Keynes and funding for this future project must now be in doubt given needed cutbacks in public spending.
- 6) The impact of increased traffic from the proposed project through J13 could significantly increase congestion at the junction at peak times which would in turn give rise to increased traffic flows through neighbouring villages and congestion further afield at key junctions in Milton Keynes.
- 7) Thus far there has been no consultation by Covanta on the impact of the proposed project on communities beyond the Marston Vale but within Bedfordshire.

(H) Site and area constraints

- 1) Noise has only been considered in terms of 'average' levels so no adequate account been taken of intermittent noise such as that from rattling of empty HGVs which may be considered to be intrusive?
- 2) Whilst much attention has been paid to traffic noise there will also be noise from the plant itself.

(I) Designated sites

- 1) MMAG believes there are no opportunities to improve the quality of the County Wildlife Site by locating an Energy from Waste plant within it.

(J) Socio-economic and community matters

- 1) MMAG believes that the construction of the site utilising 300+ jobs will be undertaken by labour imported temporarily into the area which will leave when construction is finished.
- 2) Of the remaining 60-70 jobs this will have a negligible effect on overall employment patterns. There can be no guarantee that the jobs, ongoing or in consideration, will be offered to local people.
- 3) There will be a detrimental effect on existing property prices which in turn will depress economic activity.
- 4) The Covanta proposal is at odds with the stated desire of local people and the local MP for the area to be part of a leisure destination and not somewhere they send their rubbish.
- 5) Most incinerator visitor sites visited by MMAG have been empty; it's not a process that encourages repeat viewing.

(K) Consideration of the impact of the proposed provisions and requirements within the draft Order in respect of all of the above

- 1) There is no reference to potential co-locators and how their activity would come within the scope of the draft Order; e.g. if a co-locator or a neighbouring business wished to utilise combined heat and power what would be the planning authority?

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

- visual impact,
- loss of wildlife habitat in an area that has naturally regenerated over many years,
- predicted traffic levels with associated noise and dust pollution,
- proposal to draw huge proportions of the waste processed by the plant from surrounding counties (at odds with the minerals and waste local plans),
- fact incineration discourages recycling and contributes significantly to atmospheric CO₂,

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

Yours sincerely

Hugh Roberts,
Chair,
MMAG
www.mmetag.com