

The Planning Act 2008
The Infrastructure Planning (Applications: Prescribed Forms and
Procedure) Regulations 2009
Section 37(3)(c) Planning Act 2008

**The Proposed Rookery South (Resource Recovery Facility)
Order**

Consultation Report

4 August 2010

Document Reference: 7.1

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Acronyms and Abbreviations

ASAR	Alternative Site Assessment Report
AWS	Anglian Water Services
BBC	Bedford Borough Council
BCC	Buckinghamshire County Council
BEaR	Bedfordshire Energy and Recycling Project
BLFRS	Bedfordshire and Luton Fire and Rescue Service
BS	British Standard
CAA	Civil Aviation Authority
CABE	The Commission for Architecture and the Built Environment
CBC	Central Bedfordshire Council
CDN	Cumulative Development Note
CHIA	Cultural Heritage Impact Assessment
CHP	Combined Heat and Power
CLG	Communities and Local Government
CLP	Community Liaison Panel
DAP	Directorate of Airspace Policy
DAS	Design and Access Statement
DCO	Development Consent Order
DECC	Department of Energy & Climate Change
DME	Distance Measuring Equipment
DMRB	Design Manual for Roads and Bridges
EA	Environmental Assessment
EH	English Heritage
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
EIA Regulations 2009	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009
EfW	Energy from Waste

EPA	Environmental Protection Act
ES	Environmental Statement
FGT	Flue Gas Treatment
FP	Footpath
GP	General Practitioner
HA	Highways Agency
HGV	Heavy Goods Vehicle
HIA	Health Impact Assessment
HPA	Health Protection Agency
IBA	Incinerator Bottom Ash
IBAA	Incinerator Bottom Ash Aggregate
ICAO	International Civil Aviation Organisation
IDB	Internal Drainage Board
IPC	Infrastructure Planning Commission
JMWPU	Joint Minerals and Waste Planning Unit
LIR	Local Impact Report
LLRS	Low Level Restoration Scheme
LVIA	Landscape and Visual Impact Assessment
MEP	Member of the European Parliament
MP	Member of Parliament
MRF	Materials Recovery Facility
MW	Municipal Waste
MWe	Megawatts (electric)
MVF	Marston Vale Forest
NE	Natural England
NHS	National Health Service
Nirah	National Institute for Research into Aquatic Habitats
NR	Network Rail
NSIP	Nationally Significant Infrastructure Project

NPS	National Policy Statement
NTS	Non-technical Summary
OPRA	Operational Risk Appraisal
PACS	Pre-application Consultation Report
PCT	Primary Care Trust
PER	Preliminary Environmental Report
PM10	Particulate Matter less than 10 microns in diameter
PPA	Planning Performance Agreement
PPG	Planning Policy Guidance Note
PPS	Planning Policy Statement
ROMP	Review of Old Minerals Permissions
RFS	Rail Feasibility Report
RRF	Resource Recovery Facility
SCI	Statement of Community Involvement
SOCC	Statement of Community Consultation
SoCG	Statement of Common Ground
STW	Sewerage Treatment Works
SWMP	Site Waste Management Plan
TA	Traffic Assessment
TE	Trade Effluent
tpa	tonnes per annum
WID	Waste Incineration Directive
WML	Waste Management Licence
WT	Wildlife Trust

0.0 Foreword

- 0.1.1. *Covanta believes in widespread consultation. It regards it as being of great value; as being helpful and informative and a moral requirement of an incoming developer and neighbour. Consequently, when the company originally proposed The Rookery South Resource Recovery Facility (RRF) as an application under Section 36 of the Electricity Act 1989, it accepted a need to consult more thoroughly than the basic requirements under that Act. Having then determined to seek a Development Consent Order (DCO) from the Infrastructure Planning Commission (IPC), Covanta was well placed to meet the more stringent requirements of the new Planning Act 2008 (PA 2008).*
- 0.1.2. *So, while the statutory process has changed, Covanta sees the consultation process it started in November 2008 as being seamless and going beyond the requirements under the PA 2008. Covanta has embraced both the spirit and letter of pre-application consultation requirements, as well as adopting best practice as set out in national planning guidance and by both local authorities within whose areas the RRF Project is proposed.*
- 0.1.3. *This process has given the public, organised community and business groups, statutory consultees, politicians and other stakeholders ample opportunity to suggest additional consultation methods or techniques, in particular via the Statement of Community Consultation. Covanta is pleased to report that the additional suggestions made to it (such as the use of balloons to demonstrate building and stack heights and a more permanent exhibition) were welcomed and accommodated.*
- 0.1.4. *Covanta is satisfied that as a direct result of this 20-month process (consultation feedback is still being considered after the May 2010 deadline for comments on the published Preliminary Environmental Report) its original plans have changed significantly – and for the better. Most material has been a change in the height and appearance of the Energy from Waste (EfW) building. This was in response to feedback*

from statutory consultees and the local community that the scale and massing of the building should be reduced.

- 0.1.5. *Covanta has also been clear from an early stage as to what aspects of the Project it would not change and has given the reasons why this is the case. For example, the throughput of the EfW Facility is matched appropriately to the scale of the need for new energy and waste recovery capacity within its catchment area. Rookery South Pit is an ideal location for the RRF. The purpose of the consultation was to discuss how best Covanta should make its application to the IPC and how it should work within the communities, the landscape and the lives of those that the RRF would affect.*
- 0.1.6. *To reflect Covanta's understanding that those living nearest should have the loudest voice on many of these issues, it focussed its consultation strategy upon those living within a 5km radius of the proposed RRF. So, while the Company has been receptive to views from any source (even individuals living overseas have voiced an opinion) those living closest to the RRF were encouraged more than anyone else to engage in the process, not least through the independently facilitated Community Liaison Panel (CLP). The 5km limit was also expanded where it cut through communities (such as parish boundaries) so as to give a consultation base of some 15,000 addresses. This focus was not at the expense of consultation with the wider community, however: Covanta's consultation strategy has reached out to a much wider audience as evidenced by attendance at exhibitions, local press coverage and responses to its Preliminary Environmental Report.*
- 0.1.7. *This report details how published technical and non technical reports; leaflets; press activity; newsletters; posters; exhibitions; a dedicated telephone number; one to one meetings with organisations such as Parish Councils; an email information service; the CLP; and user friendly web based information, have enabled Covanta to reach out to all sections of the community in order to engage, inform, listen and act.*

- 0.1.8. *This process went on throughout 2009 and well into 2010 but focussed on two series of public exhibitions mounted in local village halls and the Marston Millennium Forest Centre, which were staffed by experts taught to explain issues in lay terms.*
- 0.1.9. *Nevertheless two other key strands of the consultation process were continuing in parallel. Covanta held numerous meetings with all relevant statutory bodies. The results of this consultation are presented in Section 9 of this Report. The most significant changes to the Project brought about by this consultation are identified in this document.*
- 0.1.10. *The other key strand was the CLP as set out in section 6 of this Report. Again in accordance with best practice, as recognised nationally and locally, a local group was recruited to act as a representative forum for the neighbourhood. While Covanta has a model for running of such groups, it recognises the need to enable the group to act for itself. This means the CLP was able to adopt its own “model” constitution, use an independent facilitator (paid for by Covanta), call for consultants and professionals to explain parts of the RRF proposal in non technical terms and publish its work on the Covanta web site. It has become an educated forum with no allegiance or commitment to Covanta or the RRF project.*
- 0.1.11. *As the world’s biggest operator of EfW plants, many of them very similar to that proposed at Rookery South Pit, Covanta has first hand experience of the benefits to be achieved from meaningful consultation, not just now at this planning stage but throughout the life of the plant’s operations.*

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1.0 Summary

1.1. Introduction

- 1.1.1. This Consultation Report is submitted on behalf of Covanta Rookery South Limited (Covanta). Covanta has been consulting on its proposals for a Resource Recovery Facility (RRF) at Rookery South Pit near Stewartby, Bedfordshire. The RRF includes an Energy from Waste (EfW) Facility, with an average gross/net electrical output of 65/55 MWe and a dedicated post-treatment Materials Recovery Facility (MRF) to recover incinerator bottom ash and co-mingled metals, together with other elements of associated development. Consultation commenced in November 2008, has continued up until the finalisation of the application documents in July 2010, is ongoing and will continue.
- 1.1.2. Under Planning Act 2008 (PA 2008), Covanta is making this application (the Application) via the Infrastructure Planning Commission (IPC). This report describes the entire consultation process and has been undertaken to meet the requirement for a consultation report under section 37(3)(c) of the PA 2008 and demonstrating compliance with all relevant sections of Chapters 1 and 2 of Part 5 of the PA 2008. Please refer to paragraph 9.2.1 for a table showing where the statutory requirements are met within this Consultation Report.
- 1.1.3. Consultation has taken place with the following:
- 1) statutory consultees, as prescribed under section 42(a) of the PA 2008;
 - 2) other technical consultees;
 - 3) local authorities, including neighbouring authorities whose areas adjoin the two authority areas within which the Application Site lies;
 - 4) those with interests in land, falling within the categories set out in section 44 of the PA 2008; and
 - 5) the local and wider community.
- 1.1.4. Consultation took a variety of forms, including meetings with statutory and technical consultees, meetings with and presentations to the Community Liaison Panel (CLP) established for the Project, letters, advertisements, public exhibitions, use of Covanta's website and a telephone information line.

- 1.1.5. The Consultation Report has a chronological structure reflecting the four phases of consultation that have taken place, namely:
- 1) winter 2008/spring 2009;
 - 2) summer/autumn 2009;
 - 3) winter 2009/2010; and
 - 4) spring/summer 2010.
- 1.1.6. Chapters 4 and 5 cover the first two phases of consultation and include separate sections on public consultation and on technical and statutory consultation including with local authorities.
- 1.1.7. Chapters 7 and 8 cover the third and fourth phases of consultation and follow a similar structure, but reflect the additional requirements of consultation under the PA 2008 including the Statement of Community Consultation (section 7.2), environmental scoping by the IPC (section 7.4), consultation with landowners (section 7.5 and 8.9) and the Preliminary Environmental Report (section 8.2).
- 1.1.8. The CLP has been operating from September 2009 to date and therefore extends across three of the four phases of consultation. For clarity, it is covered in a separate chapter, chapter 6, rather than being split between the various chronological chapters.
- 1.1.9. Feedback from all consultation has been fully considered and has led to meaningful impacts on the final submission. These meaningful impacts are summarised under seven main theme headings below.

1.2. Consultation Outcomes

Design

- 1.2.1. The design of the Project has been shaped by the extensive consultation leading to a refined masterplan layout, landscape strategy and building design proposal. Comments during consultation have sought clarity on why a boxy building form has been developed with some respondents favouring a more curved building. An important part of the consultation has been the communication of the reasons for the building form, reducing building mass and height and reducing stack height as well as developing a well considered design that responds to the various viewing audiences, permitting colour and

shadow to be employed to assist with integration. The final design has been well received by the Commission for Architecture and the Built Environment (CABE) and the Landscape Strategy follows an approach supported in principle by Central Bedfordshire Council (CBC) landscape officers and the Marston Vale Trust.

- 1.2.2. The Landscape Strategy for the Project has been driven by the consideration of views from the elevated Greensand Ridge, from sensitive recreation and cultural heritage assets and views within the Marston Vale from settlements and the adjoining Country Park. The need to screen the operational floor and minimise visual clutter has been recognised and extensive bunding and planting proposed to provide low level containment which has been tested through 3D computer modelling demonstrated at public exhibitions.
- 1.2.3. Concerns about the extent of lighting for the Project were expressed. The control of lighting impacts has been addressed through the commitment to a carefully considered lighting strategy that provides lighting which has been subject to assessment. Montages of the Project during daylight hours and the hours of darkness have been prepared to inform design development and understanding and a more detailed lighting layout provided as part of the application.

The Environment

Landscape

- 1.2.4. Concern has been consistently expressed on the scale of the EfW Facility and its effect on the local landscape. This has driven the design and mitigation strategy but also the provision of information including photomontages such that the scale of the buildings in the landscape can be accurately understood and how the design responds to this matter. The retention of existing tree cover in the immediate proximity of Rookery South Pit has been secured to assist with long term screening and integration, especially in views from Stewartby and Marston Vale Trust and specific design integration in views from the Forest Centre. The land required to secure long term woodland screening has been expanded and secured through landowner consultation.

Cultural Heritage

- 1.2.5. Consultation has focussed on assessing the impacts on all known heritage assets and narrowing the field of detailed analysis to those assets that are considered to be most affected. 'Proving the negative' (i.e. that the Project is either not visible or not of such significance to warrant concern or further analysis) in a number of historic setting scenarios has been as important as has understanding what is visible and how that affects the value of the asset. Mitigation and integration of the Project have been important matters to progress but also ensuring the scale of the building is justified through rigorous design review (both operational requirements and architectural form). This addresses the frequently asked question: 'If this is what is required to perform the function, is it as small as it could be?'. Specific reviews of the effect on the setting of Ampthill Park House, Ampthill Park and Houghton House have driven design resolution and refinement in conjunction with wider visual issues relating to nearby settlement and recreation/amenity areas. Consultation led to detailed consideration of the plume from the EfW Facility being modelled and considered as part of the cultural heritage and visual impact assessments.

Noise

- 1.2.6. Consultation has determined the most appropriate method of assessing changes in the noise character of the area that may result from the Project with the assessment providing a clear indication of likely noise levels from key areas. Consideration of noise has influenced the layout of the RRF by moving certain operations or portions of the RRF buildings that are sources of noise further from the closest receptors, to locations where noise can be better screened. The general orientation of the main EfW building and the location of openings in its envelope, as well as the detailed design of the buildings and the materials to be used, have also been influenced as a result of the consideration of noise. An arranged site visit to a power station, with similar characteristics to the Project, with the Councils' Environmental Health Officers also assisted greater understanding as to noise stemming from particular pieces of plant.

Odour, Air Quality and Stack

- 1.2.7. The legacy of the Stewartby brickworks, and the related air quality and odour issues, has been an important point of reference during consultation as well as the explanation of what the EfW and Materials Recovery Facility (MRF)

processes produce. The consultation has sought to provide clear and concise information on the EfW and MRF process. It addressed how the Project will comply with environmental regulation and addressed concerns expressed in respect of emissions and their effects both on human health and on protected habitats. The design of the stack of the EfW Facility has been given extensive consideration with height limits imposed by the movement of air traffic balanced with required emissions dispersal heights. The stack has been deliberately designed to appear familiar in colour and proportion to the brick stacks.

Traffic and Transportation

- 1.2.8. Consultation raised several important areas of concern in relation to traffic including: out of normal working hours traffic movement, the 24 hour, 7 days a week nature of the EfW operation; association with the legacy of the movement of waste associated with landfill and the potential ongoing blight on the local highways of waste vehicles and litter; the consideration of a rail connection for waste deliveries; and the consideration of the design of a new site access and its association with the Green Lane level crossing. Information and analysis have been provided throughout the consultation process to inform consultees on these matters. The routing of traffic has been considered and clarity of predicted operational traffic movements provided including the type of vehicles predicted to visit the site so the public and consultees understand what the real effects will be. An undertaking to control the containment of waste arriving on vehicles has been made and a new site access junction designed that does not adversely affect the setting of Stewartby. A need for upgrade of the Green Lane level crossing has been considered likely by Network Rail during consultation and powers sought as part of the Application. Connection of the RRF to the rail network has been considered and, whilst it does not presently form part of the application, the RRF has been future proofed to allow for rail connection at a future date.

Ecology

- 1.2.9. The Project results in limited effects on ecology and much of the consultation process has related to clarifying the coordination of the RRF programme with that of the Low Level Restoration Scheme (LLRS) that is to be undertaken at The Rookery. The Project provides ecological enhancement through the provision of brown roofs and green walls and an extended wetland margin to

the attenuation pond proposed under the LLRS. In addition, the inclusion of extensive woodland and tree cover, particularly at the periphery of The Rookery, will increase the extent of habitat that contributes to supporting key ecological receptors and, importantly, enhances the integrity and functionality of ecological links both within the Application Site and reaching out into the wider Marston Vale.

Public Health

- 1.2.10. The Health Impact Assessment (HIA) outlines a clear process for establishing the perceived health impacts arising from the Project profile through consultation i.e. those aspects that may potentially influence health. The assessment considers the community profile, evidence base and the findings from consultation. The HIA has made a number of recommendations which have been considered and recorded within this report and signposts to other documents are provided where specific responses to recommendations are addressed.

Amenity and Recreation

- 1.2.11. Visual amenity and the effects of the Project on recreation were considered at an early stage. The consideration of potential improvements to the rights of way network, effects on the amenity of the rights of way network, public open space and the Millennium Country Park, as well as the effects on residential amenity, have all been considered during design development as well as within the Environmental Statement. The consultation process highlighted the concerns of local residents who were keen to understand what could be seen and from where in order to inform their understanding of the scale of the built elements within views and this was assisted by the provision of montages and a 3D computer model used at the second public exhibition.
- 1.2.12. Opportunities for enhancement to the rights of way network, connections across the site and with the Millennium Country Park have been developed as a result of consultation. Amenity considerations have driven the specific elevation and massing character of the western elevation of the EfW Facility in views from the Forest Centre and Marston Moretaine, introducing green walls and an irregular building silhouette. The integration of the RRF in views from Ampthill Park and Houghton House has been subject to extensive consultation and design development to keep the main EfW building below the horizon line,

screen the operational floor from view and develop a regressive colour palette and a series of simple enclosing “shells” that are devoid of human scaled elements on the southern side to assist in reducing the perception of scale.

- 1.2.13. The general amenity of residents has been considered, addressing views from settlements, providing montages to demonstrate the effect on views and inform design development. The lighting strategy has been considered following consultation with a view to minimising the effects of lighting on amenity.

Sustainability and Climate Change

- 1.2.14. Although an important theme of the Project, which is fully discussed in the Environmental Statement and Design & Access Statement, there has been no significant and separate consultation outcome in relation to sustainability and climate change. Rather, these key themes are implicit in a sustainable development of this nature with carbon reduction credentials.

Socio Economics

- 1.2.15. The socio economic effects of the Project have been raised during consultation and explored and addressed where possible as the Project has progressed. The main issues raised have related to the potential effects on house prices, the availability of discounted electricity, the nature of the effects on the Forest Centre, the local benefits achieved by the Project through direct funding of community initiatives and employment. The perception that the area is on the upturn and recovering from the legacy of the brickworks and landfill activities has been raised, with concerns that the Project reverses this trend.
- 1.2.16. Following consultation, a Community Trust Fund has been proposed together with an agreed funding stream for the Marston Vale Trust. The Community Liaison Panel (CLP) established as part of the consultation strategy is proposed to be retained through the life of the Project to assist in the maintenance of good communication and dissemination of information.
- 1.2.17. The short term economic benefits of the construction project and promotion of local procurement have also been identified.
- 1.2.18. The visitor /education centre lies at the heart of the RRF and is intended to promote better understanding of the process, address concerns raised by the

HIA about perceived health impacts and develop links with the Forest Centre and local tourism.

- 1.2.19. The context of the Application Site has been fully recognised and has underpinned the approach to the Project. The site context is subject to considerable change underpinned by planning policy with significant environmental, social and economic change. The design philosophy has been driven by the desire to develop a well designed series of buildings marking a positive sustainable future for the Marston Vale, promoting the objectives of the Vale.
- 1.2.20. The Project and the EfW building have been subject to considerable design development and review by CABI and other organisations and has been well received as a project of merit responding to its context.
- 1.2.21. The transport strategy for the Project has assessed the potential effect of increased traffic movements and no significant or unacceptable impact has been identified.
- 1.2.22. Stewartby is a settlement subject to future change with extensive new planned development including residential development and the Nirah (National Institute for Research into Aquatic Habitats) visitor attraction project. The village is presently poorly connected to the Millennium Country Park which has an unremarkable boundary and links to Green Lane. The Project secures a new park entrance that positively links the village via Green Lane to the park.

Planning

- 1.2.23. The planning context of the site has been explained throughout the consultation process and this has been an important area of communication, setting the Project in its wider context and explaining the consideration of alternative sites. The area is subject to planned change that will see considerable change in the character of the area set within the Marston Vale forest. The Project will form part of the positive future of the Vale.

1.3. Conclusion

- 1.3.1. The multi-stranded consultation approach adopted by Covanta has had a positive influence on the Project in many different respects, as summarised above. Covanta does not see this Consultation Report as the conclusion of the

consultation process but merely a snapshot. Ongoing technical consultation is both inevitable and desirable, and ongoing relationship building and information exchange with the local community key as a potential new neighbour. The latter has been underpinned by the operation of the CLP to date and a separate report prepared by the independent facilitator outlines its impact and progress (see Appendix 21).

2.0 Introduction

2.1. Background

- 2.1.1. This Consultation Report has been prepared on behalf of Covanta Rookery South Limited (Covanta). It accompanies an application (the Application) by Covanta for a Development Consent Order (DCO) to the Infrastructure Planning Commission (IPC) to authorise the construction and operation of a Resource Recovery Facility (RRF) at Rookery South, a former brick clay pit, near Stewartby in Bedfordshire. The RRF is referred to, with other components, as the “Project”. Rookery South and the Application Site as a whole lie mainly within Central Bedfordshire and, in respect of a small area of land, within Bedford Borough. The main components of the Project comprise an Energy from Waste (EfW) Facility with an average gross electrical output of 65 mega watts (MWe) and a post-treatment Materials Recovery Facility (MRF) to recover bottom ash and metals.
- 2.1.2. Covanta is committed to best practice in public consultation and engagement throughout the planning process irrespective of the route for determination of the projects that it promotes. The Company recognises the benefits that can be achieved by engaging with host communities, local authorities, key stakeholders and developers through front-loaded, inclusive pre-application consultation and communication.

2.2. The Applicant: Covanta

- 2.2.1. The group of companies of which Covanta forms a part is the world’s largest operator of EfW facilities, with 45 plants worldwide, mostly in the United States. These facilities process over 18 million tonnes of residual municipal, commercial and industrial waste. By using waste as a fuel, Covanta generates enough heat and electricity to power one million homes. In addition to dramatically reducing the amount of waste going into landfill, this also prevents some 15 million tonnes of carbon dioxide from entering the atmosphere every year.
- 2.2.2. Covanta entered the UK market in 2005 and offers high quality, safe and efficient solutions for treating residual waste (i.e. the waste that remains after re-use and recycling). It achieves this through investing in larger scale plants so as to maximise the environmental and economic benefits, passing these savings on to local authority clients and their Council Tax payers. Covanta has

received a wide range of safety and environmental awards in recent years from US environmental and government bodies.

2.3. The Purpose of this Report

2.3.1. As an applicant for development consent, Covanta is required to produce this Report pursuant to section 37(3)(c) of the PA 2008. The Report is required to give details of:

- 1) what has been done in compliance with sections 42 (Duty to consult), 47 (Duty to consult local community) and 48 (Duty to publicise) of the PA 2008;
- 2) any relevant responses to that consultation; and
- 3) the account taken of any relevant responses by Covanta.

2.3.2. A relevant response, of which Covanta is required to take account, and as defined by the PA 2008, means:

- a) a response from a person consulted under section 42 (Duty to consult) that is received by the applicant before the deadline imposed by section 45 in that person's case;
- b) a response to consultation under section 47(7) (Duty to consult local community) that is received by the applicant before any applicable deadline imposed in accordance with the statement prepared under section 47; and
- c) a response to publicity under section 48 (Duty to publicise) that is received by the applicant before the deadline imposed in accordance with section 48(2) in relation to that publicity.

2.4. The Proposed Project

2.4.1. The Project includes certain key elements, of which the most important is the EfW Facility. This is an onshore electricity generating station having a capacity of more than 50MWe and, as such, it is a nationally significant infrastructure project (NSIP) within the definition contained in sections 14 and 15 of the PA 2008. The PA 2008 requires that in order to authorise construction and operation of the EfW Facility an application must be made to the IPC under section 37 of the PA 2008. Figure 2.1 below shows the key components of the Project.

2.4.2. As well as the EfW Facility, the application to the IPC also seeks development consent in respect of certain associated development as identified in section 115(2) of the PA 2008. The main elements included in the application are:

- 1) the post-treatment MRF;
- 2) the provision of a drainage channel on a realignment in substitution for a drainage channel that would otherwise be provided in Rookery South Pit by the LLRS;
- 3) the extension of the attenuation pond to be constructed in Rookery South Pit by the LLRS;
- 4) an access road connecting the RRF to Green Lane, Stewartby;
- 5) a underground connection to the electricity grid allowing the export and import of electrical power;
- 6) works for the creation of an upgraded site access and new junction on Green Lane, Stewartby and at the internal entrance to the Marston Vale Millennium Park;
- 7) improvements to Green Lane between its junction with footpath 4 and Stewartby Lake, including footway improvements; and
- 8) an improvement to Green Lane level crossing including the installation of full automatic barriers.

2.4.3. Other associated development includes:

- 1) weighbridges and security gatehouses;
- 2) provision of lighting;
- 3) internal site roads and parking facilities;
- 4) workshops and stores;
- 5) bunding, earthworks, landscaping and boundary treatments;
- 6) pipes for steam pass outs and for hot water pass outs within the Application Site;
- 7) habitat creation;
- 8) the provision of footpaths and cycleways and footpath linkages; and

9) foul drainage provision, surface water management systems and water supply works.

2.4.4. As well as these elements, the DCO will also authorise demolishing part of the existing conveyor structure on the Application Site.

Contextual Site Plan

Figure 2.1



2.4.5. Further details of the Project are set out in Chapters 1 and 3 of the ES that accompanies the DCO submission.

2.4.6. The design of the Project is a result of three primary considerations:

- 1) technical and operational requirements of the Project, including the requirements to meet regulatory standards and meeting the waste management and energy needs of the area;
- 2) consultation responses from stakeholders, including prescribed consultees and the local community; and
- 3) in-house iteration and design development by Covanta and its design team in response to the Environmental Impact Assessment (EIA) process.

2.5. Covanta's Application Strategy

2.5.1. Covanta had originally intended to apply to the Secretary of State for Energy and Climate Change under section 36 of the Electricity Act 1989 for consent to construct and operate the Project. To inform environmental scoping, Covanta produced a Pre-submission Communications Strategy (June 2009; see Appendix 1) outlining its approach to consultation and its part in the application process. Adopting this Strategy, Covanta undertook extensive engagement, including discussions with statutory consultees, local community consultation by way of six staffed exhibitions (in July and August 2009), establishing a Community Liaison Panel (CLP) in September 2009 and ongoing profile raising (e.g. leaflet drops) to explain the nature of the project.

2.5.2. Since 1 March 2010, the IPC has replaced the Secretary of State for Energy and Climate Change as the body to whom applications for Nationally Significant Infrastructure Projects (NSIPs) should be made. The IPC is an independent public body set up with the dedicated task of examining and determining applications for NSIPs. Covanta determined for a number of reasons to pursue its application for the Project via the IPC. The earlier Communications Strategy was extended to incorporate the more extensive statutory consultation requirements of the PA 2008.

2.5.3. Since the general election that took place in May 2010 the Coalition Government has announced plans for a Major Infrastructure Planning Unit to consider applications for development and consent in respect of large scale infrastructure projects. This process and body will replace the IPC. In the interim, applications are to be made to the IPC as envisaged by the PA2008. New primary legislation will be brought forward to replace the IPC. Until it is in

place the IPC will continue to consider NSIPs and the Secretary of State will determine them to ensure there is no delay in bringing forward urgently required infrastructure.

2.6. Consultation Summary

- 2.6.1. Set out below is a summary time line of the main activities in Covanta's Communications Strategy. This timeline also sets the structure of this report that follows.

Summary time line of Communications Strategy

Date	Consultation Initiative	Location in report
November 2008	Public launch of the Project.	Section 4
March to May 2009	Informal environmental scoping with technical statutory consultees.	Section 4
June to August 2009	Consultation on Project and Section 36 EIA Scoping Report, including six public exhibitions.	Section 5
September 2009 (ongoing)	Establishment of CLP, 12 meetings and one site visit to date.	Section 6
November and December 2009	Consultation on draft Statement of Community Consultation as required by section 47 (1) and (2) of the PA 2008.	Section 7
December 2009 to April 2010	Consultation on EIA Scoping Report.	Section 7
January 2010, ongoing	Consultation with landowners, as required by sections 42 and 44 of the PA 2008.	Section 7 and 8
February to March 2010	Publication of SOCC, publication of Statutory Notices, consultation on Project and Preliminary Environmental Report including six staffed public exhibitions as required by section 47 (6), section 48 and section 42 of the PA2008.	Section 7 and 8
June 2010	Community newsletter and preparation of Statements of Common Ground.	Section 8

- 2.6.2. In this consultation report a number of discussions and communications with a variety of parties are recorded. In a number of cases matters are stated to be accepted or agreed. Needless to say, this is not considered by Covanta in each case to be a view that binds any such party. Whereas Covanta may use and ascribe weight to such views as are expressed and recorded, it is open to the relevant parties to make other representations in due course.

3.0 Pre- Application Consultation Strategy

3.1. Introduction

- 3.1.1. This section explains the overall approach to its pre-application consultation strategy that Covanta has followed since November 2008 until the submission of the DCO application to the IPC. Covanta believes that its approach fulfils the requirements of best practice in consultation and will satisfy the requirements of the PA 2008.
- 3.1.2. The fundamental purpose of Covanta's pre-application consultation strategy has been to ensure that technical consultees have had the opportunity to inform the Project from the earliest opportunity and that the local community:
- 1) has had access to information at the beginning of the process;
 - 2) has been enabled to put forward their own ideas and feel confident that there is a process for considering ideas;
 - 3) has had an active role in developing the project and options to ensure local knowledge and perspectives are taken into account; and
 - 4) has received feedback and been informed about progress and outcomes.

3.2. Current Guidance and Best Practice

- 3.2.1. The principles which have guided Covanta's pre-application consultation strategy are based on current best practice as set out in a number of documents including:
- 1) Communities and Local Government's (CLG) document 'Planning Act 2008: Guidance on pre-application consultation', September 2009. The preceding 'Consultation on the Pre-Application Consultation and Application Procedures for Nationally Significant Infrastructure Projects' published by CLG in March 2009 also guided Covanta's consultation approach;
 - 2) the Infrastructure Planning Commission Guidance Note 1 on Pre-Application Stages (Chapter 2 of the Planning Act 2008, Revision 1), 29 March 2010 and the Infrastructure Planning Commission Guidance Note 2 on Preparation of Application Documents under section 37 of the PA 2008, 7th December 2009;

- 3) Communities and Local Government guidance document Community Involvement in Planning: the Government's Objectives, February 2004;
- 4) planning guidance, for example PPS1: Delivering Sustainable Development, January 2005 and Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10, June 2006; and
- 5) The Statements of Community Involvement (SCI) of Central Bedfordshire Council (CBC) and Bedford Borough Council (BBC) both authorities have been absorbed into Covanta's strategy. These SCIs contain valuable information concerning make up of the local community, including hard to reach groups, and suggested methods for consulting all members of the community.

3.3. Covanta's Approach to Consultation

- 3.3.1. With a desire to carry out exemplary consultation and having taken account of its own experience, relevant guidance, legislative requirements and contemporary best practice, Covanta developed a Pre-Application Consultation Strategy (PACS; see Appendix 2), based on its earlier Pre-submission Communications Strategy (Appendix 1). The six key principles of this consultation strategy, together with examples of how they have been realised, are described below:

1) Using participative methods and making participation and involvement as easy and inclusive as possible;

- 3.3.2. Covanta has worked to ensure that the consultation undertaken is inclusive of all members of the community. At the Project's inception in November 2008, a wide database of stakeholders was developed pertinent to all those with an interest in The Rookery South site. This has been continuously updated and is sensitive to the likely impact of the Project.
- 3.3.3. The CLP comprising volunteer representatives of the local community has been set up under an independent facilitator to provide ongoing liaison and a dedicated forum to work through the issues as raised by its members. Twelve CLP meetings have been held to date with a site visit also undertaken. The CLP suggested that as part of the exhibitions on the preliminary environmental information in the summer of 2010 balloons be flown on The Rookery South

site to allow people to more easily appreciate the maximum height and location of the EfW stack and the main building. Covanta acknowledged that this would provide for more meaningful feedback and flew balloons accordingly.

- 3.3.4. Eleven interactive and fully staffed public exhibitions have been held over the course of the pre-application consultation period, six at the time of the environmental scoping and five presenting feedback of that process and the findings of Covanta's Preliminary Environmental Report. The exhibitions were held at times and locations convenient to those members of the community most likely to be affected by the Project, and additional exhibitions were provided following requests from the CLP. Feedback forms for attendees of the exhibitions were provided to give an easy mechanism for people to make their views known.

2) Applying the decision principle; making sure that the exercise will inform and influence decisions to be made;

- 3.3.5. This operates so that the consultation is designed to inform the decision to be made. Covanta has taken great care to ensure that consultation materials were intuitive, clear and provided enough information to enable consultees to understand the Project and to provide meaningful input. It has also made clear to the consultees that their responses to the consultation will be taken into account. Consultation commenced on the Project well before decisions were taken on the design of the buildings and its operational parameters, thus ensuring that the opportunity was provided for key, driving issues raised by the local community to be "built into" the scheme from the outset.

3) Clear feedback should be given to consultees on how their views were taken into account;

- 3.3.6. For example, all consultees who completed a Feedback Form or who left comments with details of their address were sent a letter detailing how their views have been taken into account. Furthermore, letters written commenting to Covanta on the Preliminary Environmental Report were responded to through the provision of further information as appropriate. At the spring 2010 public exhibitions, information was provided that described how the Project had been influenced by the feedback from the spring 2009 public exhibitions. Technical consultees have been kept advised at various meetings as to how their comments have been addressed by the Project, a form of engagement

that is now leading to the preparation of Statements of Common Ground across the full range of specialist areas e.g. cultural heritage and noise. At each CLP meeting feedback on issues raised at the previous meeting and resulting actions was provided.

4) Front-loading consultation is necessary i.e. engaging with the local community before the application for a DCO is submitted to the IPC;

- 3.3.7. The upfront provision of information regarding the proposals, timescale of the proposed application for the DCO and the scope for involvement, was a key driver for the consultation. All key stakeholders were provided copies of the Environmental Scoping Report and the Preliminary Environmental Report and were encouraged to respond with their opinions. These documents were also made widely available (for inspection and comment) to the general public via the Covanta website, staffed exhibitions and in local public libraries. Extensive publicity was provided at each key stage of the process to ensure maximum awareness of the Project was achieved. By using this approach, engagement was achieved throughout the 20 months of pre-application consultation.
- 3.3.8. CLG guidance recommends that information be obtained about the socio-economic characteristics of the local community. By this time, Covanta had already commenced an Economic Statement and Socio Impact Assessment to support its EIA. As such, it was already well placed to identify the social and economic characteristics of the area, particularly the needs of difficult to reach groups etc. This knowledge has been expanded through the consultation process at an early phase in the Project's evolution.

5) Considering the most appropriate and productive methods of consultation;

- 3.3.9. Care was taken to prepare consultation strategies that were as inclusive as possible but also carefully defined the scope for public involvement in order to avoid misleading participants. For example, the Preliminary Environmental Report was clear to specify those aspects of the Project design and operation that were "fixed" and those aspects that remained "unfixed" and open for further modification.

- 3.3.10. Initial consultation was undertaken with specialist statutory consultees to determine technical parameters prior to opening wider consultation with the local community.
- 3.3.11. A selection of bespoke communications materials were produced throughout the consultation process, including:
- 1) handouts explaining the application and decision making process;
 - 2) summary leaflets on Covanta's proposals and where to find more information;
 - 3) flyers giving details of exhibition dates, venues and how to join the CLP;
 - 4) independently produced Environmental Agency information has been made available on: energy from waste facilities; EfW and health; questions and answers including licensing and monitoring procedures; and FAQ's on air quality, health and environmental impacts; and
 - 5) "live" computer modelling that simulated the presence of RRF in the landscape when viewed from key vantage points was presented at exhibitions.
- 3.3.12. Stakeholders were also directed to an online communications resource and dedicated web page containing information on the Project and the exhibition boards and communication materials. A dedicated email address and freepost address was also set up so that further information could be sought. The CLP was set up to provide a dedicated forum providing ongoing issues with local impact. All of these different vehicles for engagement have increased the level of feedback received.
- 3.3.13. The communication footprint for the Project was carefully considered with a two pronged approach adopted, one targeting those closest to the Project and the other targeting a wider audience.

Covanta believes that those within close proximity to its projects should be given a greater opportunity to be engaged with the development proposals. After careful consideration and consultations with the local authorities, Covanta undertook a direct mail consultation within a radius of 5km (shown in pink on figure 3.1) from the site of the Project. The footprint was then adjusted to reflect Parish Council boundaries, producing the area edged in green on figure 3.1 below.

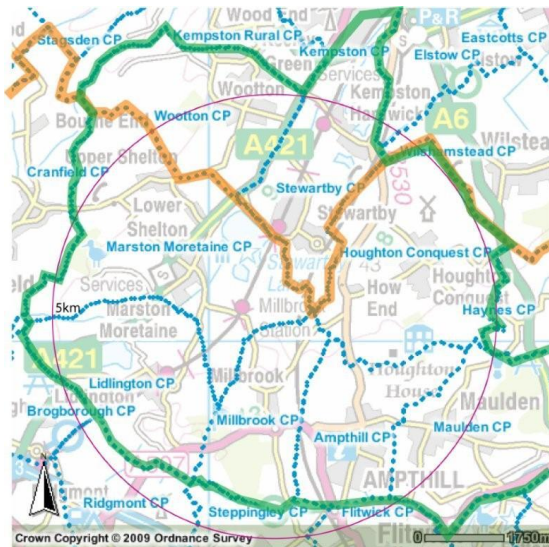


Figure 3.1 Consultation Footprint

- 3.3.14. The proposed consultation footprint was adjusted to reflect Parish boundaries, to avoid splitting villages or local areas along artificial boundaries. The 5km radius was also deemed to be appropriate from a near neighbour issues context, following discussions with the local authorities, during which 3km (too small), 5km and 7km (larger than required) radii were reviewed. The choice of Parish Council boundaries also relates to stakeholder engagement by ensuring that parish/town councils, the finest grained level of local representation, are consulted.
- 3.3.15. A distribution company was engaged to deliver leaflets and information about the Project and the proposed exhibitions to all households and other premises within the agreed area, to approximately 15,000 addresses. This information was supplemented by posters and leaflets advertising the consultation process at key public venues throughout the area, publicly in local press and newsletters and a dedicated letter of invitation to all local area representatives.

interest groups, voluntary groups and community groups to engage hard to reach groups was sent when exhibitions were held.

Wider Neighbour Consultation

- 3.3.16. The 5km consultation footprint does not ignore or downgrade other legitimate enquiries or requests for information from further afield; for example a stakeholder database including all those potentially interested in the Project was compiled. This is updated regularly. Covanta has also met with Parish and Town Councils outside of the 5km footprint e.g. Kempston when requested.
- 3.3.17. Throughout the pre-application process, Covanta remained open to suggestions on how best to communicate and listen to opinions. The principal measures that it deployed during the pre-application consultation process were:
- 1) delivery of leaflets explaining the proposed application to addresses in the Parishes within the 5km radius of the Project. This leaflet provided details on how to respond to consultation about the Project through the consultation process;
 - 2) holding meetings with the CLP during the consultation process. Agendas and notes of the CLP meetings have been made available by means of the Project website: www.covantaenergy.co.uk/site/rookerysouth;
 - 3) holding local exhibitions and workshops explaining the IPC application process and the Project. The exhibitions provided opportunities for the public to provide feedback on the Project and to respond to the consultation. Exhibition attendees were encouraged to complete and submit a feedback form before the consultation closing date. The exhibitions were held on Friday evenings, Saturdays and Sundays to encourage the highest possible attendance. The exhibitions were staffed with professionals who were able to describe the Project and the application process. They noted any comments and responses to the consultation, and it was possible to speak to the Project team on a one to one basis;
 - 4) the exhibitions were publicised via a press release to the local news media, including local radio and television, and by placing a notice in the local

newspaper, displaying posters and through door-to-door leaflets distributed throughout the locality;

- 5) Covanta wrote directly to key stakeholders, such as local councillors, MPs and CLP members and advised them of the exhibitions, other consultation proposals and the Project proposals;
 - 6) providing feedback on people's views expressed to date and how they have been taken into account; and
 - 7) documents, plans and maps showing the nature and location of the Project were available for inspection free of charge at a number of publicly accessible locations in the vicinity of the site e.g. local libraries.
- 6) Regarding consultation as a meaningful process rather than a box-ticking exercise.**

3.3.18. Procedures were established by Covanta from the outset to ensure two-way communication and a regular, open exchange of information and views on the proposals. Throughout the environmental scoping and consultation processes Covanta has remained open to suggestions as to how best to communicate, has listened to views and has refined its strategy accordingly.

3.3.19. For example, Covanta consulted with CBC and BBC on the draft Statement of Community Consultation (SOCC). In direct response to their comments on the draft, Covanta amended the SOCC such that when it was published it:

- 1) increased the consultation period on the Preliminary Environmental Report from 4 weeks to 6 weeks;
- 2) publicised details of Planning Aid and the IPC role; and
- 3) provided more information on the nature and scale of the Project.

3.3.20. Furthermore, and in response to the Councils' request that Covanta share drafts of the IPC application documentation, the draft DCO, draft Planning Statement and draft Need Assessment have been shared and discussed over several months.

3.3.21. Covanta pursued its pre-application consultation strategy in conjunction with the formal consultation requirements of the IPC (see Table 3.1 overleaf).

- 3.3.22. A detailed description of each stage of consultation, in line with the principles described above, is set out in the following sections of this Report.

Compliance with Legal Requirements

IPC Requirement	Covanta Response and Comment	When
Request for environmental scoping opinion from IPC (under Regulation 8 of the EIA Regulations)	Submitted full Environmental Scoping Report to the IPC. Scoping Opinion received from IPC in April 2010.	February 2010
Notification of the IPC of the proposed application (under S46 of the PA 2008)	The IPC was notified of the proposed application. Covanta continues to consult the IPC.	19 February 2010
Consultation to be undertaken with local authorities, prescribed consultees, landowners and others significantly affected (under Section 42 of the PA 2008).	Consultation letter issued to local authorities, prescribed consultees, landowners and other relevant parties. Letter complied with s45 PA 2008. This report also details other consultation activities.	19 February 2010 for a 6 week period, ended 3 May 2010. Covanta continues to engage with consultees.
Consultation with the Local Authorities in respect of the proposed Statement of Community Consultation (SOCC) (under Section 47 (2) of the PA 2008)	Draft SOCC issued to local authorities. Responses received from Central Bedfordshire and Bedford Borough Councils and incorporated. CLP also consulted on draft SOCC and comments addressed.	7 December 2009 and during CLP meetings
Publication of the SOCC in a newspaper circulating in the vicinity of the land (under Section 47 (6) (a) of the PA 2008), to also identify that it is EIA development in accordance with Reg 10 of EIA Regs 2009	Published in Bedfordshire Times and Citizen. EIA reference was included. Covanta has complied with the proposals in the SOCC, including publication of Preliminary Environmental Report (PER publication); letters distributed to 15,000 addresses within 5km footprint of the site advising of the PER, exhibitions and the Project generally; 5 staffed exhibitions held (developing on from the 6 exhibitions undertaken in 2009), and an unmanned permanent exhibition presented throughout the consultation period at the Forest Centre; Community Liaison Panel meetings continued; balloons flown to indicate maximum building and stack heights; documents placed in Council Offices and libraries, Project web site promoted and variety of media routes used to consult and promote awareness	19 February 2010 and 8 March 2010
Publish notice in accordance with s48 of the PA 2008, to also identify that it is EIA development in accordance with Reg 11 of EIA Regs 2009	Published in London Gazette and The Times, and in Bedfordshire Times and Citizen. EIA reference was included.	18, 19 and 25 February 2010

4.0 Launch of Project Consultation, Winter 2008/Spring 2009

4.1. Introduction

- 4.1.1. This section describes consultation from the Project launch in November 2008 up to, and including, the early scoping consultations held with technical and primary stakeholders in spring 2009.

4.2. Public Consultation

- 4.2.1. Covanta has sought from the very beginning of the Project to ensure that the consultation it has undertaken is inclusive of all members of the community. At the Project's inception in November 2008 a wide database of stakeholders was developed embracing those who were considered most likely to have an interest in the Project. At that stage the database relied upon consultation with local authorities (including the then Bedfordshire County Council), the guidance noted in section 3.2 above and knowledge of relevant stakeholders.
- 4.2.2. This database has been continually updated by local knowledge, desk research, media coverage and direct contact initiated by Covanta's team or third parties as the Project progressed. It has formed the basis for all consultation. It includes statutory and non-statutory consultees and members of the public.
- 4.2.3. In November 2008, consultees were informed of the proposals for the Project by letter and in the press (please see 4 November 2008 press release in Appendix 3) and asked about the form of consultation that they would prefer. The recommended approach of the local authorities at that time included the use of liaison groups in relation to applications such as this. As at November 2008 there were no appropriate existing liaison groups in the Stewartby area. Covanta also favours the use of liaison panels in respect of its projects, in the planning, implementation and operational phases. Without an appropriate existing group it was necessary for one to be established in line with best practice. Covanta values independent feedback from such groups and accordingly proposed that it be independently facilitated.
- 4.2.4. Nominations for membership of the CLP were requested and two nominations were received as a result. Since that time the Terms of Reference for The Rookery South CLP were established, along with its full membership (following public exhibitions in summer 2009) and the first meeting was held in

September 2009 (see Chapter 6). The CLP provides ongoing liaison and a dedicated forum to consider issues relating to the Project. Further detail on the CLP and its work is explained in Chapter 6.

4.3. Technical and Statutory Consultation

- 4.3.1. The anticipated application procedure for the Project was pursuant to section 36 Electricity Act 1989 (EA1989). When Covanta was preparing its proposals for the Project in early 2009, although the PA 2008 had become law, its provisions were not yet in force, the details of pre-application procedures were not yet known and the timetable for its implementation remained fluid. Indeed, the IPC did not receive its powers to determine applications until March 2010. In light of this Covanta commenced preparation for an application under s 36 of the EA1989. As part of these preparations Covanta initiated meetings in order to make an application to the Secretary of State for Energy and Climate Change for an environmental scoping opinion in respect of the Project. This was because the application under the EA 1989 would be required to be accompanied by an Environmental Statement. Whilst not a mandatory part of the process, it is good practice which Covanta adopts.
- 4.3.2. A series of informal Environmental Impact Assessment scoping meetings was held with technical statutory consultees in spring 2009. These considered the principles of the Project, policy requirements and high level design concepts. Outline technical analysis was undertaken on issues such as site drainage, access/transportation and planning. Baseline information for air quality and noise was initiated through monitoring, and outline appraisals of environmental, cultural heritage and visual impacts were undertaken. It was necessary to develop this level of technical understanding prior to presenting the Project parameters to the wider community.

- 4.3.3. Over March, April and May 2009 Covanta and relevant members of its team met the following technical consultees to discuss the Project:

Consultee	March 2009	April 2009	May 2009
Dept of Energy & Climate Change			✓✓
Local Authorities	✓✓	✓	
English Heritage		✓	✓
The Environment Agency			✓✓✓
Natural England			✓
Wildlife Trust			✓
Internal Drainage Board		✓	
Anglian Water Services			✓
Highways Agency		✓✓	
Network Rail			✓
Primary Care Trust and Health Protection Agency			✓

- 4.3.4. Set out below is a summary, by organisation, of meetings held, the key feedback from the consultee and the key responses to that feedback by Covanta. Some meetings were attended by several consultees and these are not described twice.
- 4.3.5. Appendix 4 contains a meetings tracker, which shows when all meetings occurred and who attended.

Local Councils

- 4.3.6. Discussions took place with the then Bedfordshire County Council's (BCC) Planning Team for Minerals and Waste, which led to a full environmental scoping meeting between Covanta and Council technical officers on **20 April 2009**. By then local government reorganisation had led to the abolition of BCC. The Project is now located in the areas of successor authorities, Central Bedfordshire Council (CBC), and to a lesser extent, Bedford Borough Council (BBC). On 20 April 2009 Covanta presented to the waste planning officers and officers from the highways, environmental health, landscape and communications team of each authority. A copy of Covanta's presentation is

provided in Appendix 5. The presentation described the Project, covered work to date by the project team and sought discussion of scoping proposals for architecture; landscape and visual impact; cultural heritage; air quality; noise and vibration; and transport. The planning policy context and Covanta's proposed communication strategy were also discussed.

- 4.3.7. The presentation then led to a series of further individual technical meetings to discuss specific elements of the Project scoping with the appropriate specialist council officers.

- 4.3.8. Key feedback from consultees:- further meetings required

- 4.3.9. Key response by Covanta: meetings arranged (please see Appendix 4).

English Heritage

- 4.3.10. Covanta and relevant members of its team met English Heritage (EH) and Central Bedfordshire Council's Landscape Officer on **22 April 2009**. The initial curved building form for the EfW Facility was presented. EH considered that the main impacts of the proposed scheme would be on nearby churches, Houghton House, Scheduled Monuments in Ampthill Park and the surrounding areas and the Grade II listed buildings in the surrounding areas. EH also suggested that it would prefer a simple and clean building form, that discussion of the relative merits of the building orientation and 3 stacks compared to 1 stack would be useful, and that given the scale of the building, more than one material for the roof would be preferable. Key views of the development would be from Houghton House, Ampthill Park House, Ampthill Park, Stewartby Crescent, Millbrook Station and South Pilling Farm House. In reviewing the application, EH's main consideration would be whether the Project enhances, or detracts from, the cultural landscape.

- 4.3.11. Key feedback from consultees: key heritage assets likely to be affected were identified, preference for a functional-looking building, consider merits of 3/1 stack, consider reorientation of building, would like to see photomontages of proposed development from key locations.

- 4.3.12. Key response by Covanta: will include the assets identified in its landscape and visual assessments, will re-consider stack numbers and building form in relation to context, will prepare photomontages.

- 4.3.13. Covanta and its team met EH again on **15 May 2009**. Covanta's team confirmed that reducing the capacity of the RRF would not reduce the height of the EfW building. The methodology for the Landscape and Visual Impact Assessment was discussed. EH confirmed that Hanson had applied to remove the Stewartby Chimneys due to instability (although EH were challenging this) and that Marston Vale was considered to be a post-industrial landscape. Views from Ampthill and Houghton were agreed as being particularly important. Covanta confirmed that they were keen to identify community or planning gain in relation to the Project and EH identified some possible targets for this. It was agreed that there was no benefit in rotating the building through 15 degrees. It was also agreed that a 3 stack design was likely to be better than a one stack given the proportions and that Covanta's team would explore possible arrangements. EH confirmed that the building should not be iconic, but should be simple, functional and not dominate the view, it should blend as much as possible into the landscape, perhaps with the help of off-site planting.
- 4.3.14. Key feedback from consultees: prefer 'honest' building, as low as possible in the landscape, 3 stacks likely to be better than 1 stack, no benefit in rotating the building.
- 4.3.15. Key response by Covanta: will produce material for further discussion of stacks and building form.

Environment Agency

- 4.3.16. Covanta and its ecological team met with the Environment Agency (EA), Natural England (NE), Wildlife Trust for Bedfordshire, Cambridgeshire, Northamptonshire and Peterborough (WT) and the landscape officer for Central Bedfordshire Council on **8 May 2009**. The meeting was preceded by a walkover of the site attended by NE and the EA. The ecological work undertaken to date was explained and how this would inform baseline conditions and impact assessment in relation to the emerging proposals for the Low Level Restoration Scheme (LLRS) of Rookery Pits by O&H Properties Ltd and the RRF proposals. The scope of the ecological baseline work for the LLRS had been agreed with the Bedfordshire County Ecologist in spring 2008. The outcome of these ecological surveys was discussed in summary and great crested newts, stoneworts and invertebrate assemblages were identified as being significant in shaping mitigation measures. The Ecological Impact Assessment for the RRF proposals would assume the LLRS has been

implemented as appropriate. Therefore, no further baseline ecological surveys were considered necessary to inform the ecological impact assessment for the RRF. The impacts were expected to relate primarily to changes in air quality on and off site. A technical note describing how this would be assessed was in preparation and would be circulated to all interested stakeholders. The WT suggested that Covanta should talk to the Marston Vale Trust and Randalls Farm Environmental Education Centre to discuss contributions to the biodiversity in the wider Marston Vale.

- 4.3.17. Key feedback from consultees: accept approach as outlined, discuss possibilities with other stakeholders.
- 4.3.18. Key response by Covanta: circulate a technical note and seek discussions with other stakeholders.
- 4.3.19. Covanta and its team met the EA again on **12 May 2009**, to discuss pollution prevention and control, and ground water issues. Technical discussion focussed on the need to ensure that ground water is not polluted by activities associated with the Project. Foundation design must be carefully considered to ensure that preferential pathways were not created and also to protect against damage by aggressive ground conditions i.e. high levels of naturally-occurring sulphates. Environmental permits were then discussed. The EA would require an operational risk appraisal (OPRA) spreadsheet to be completed. The environmental permit application would be made in parallel with the planning application. The EA confirmed that its main concerns were ground water protection as discussed, air quality and flood risk. A post-meeting walkover of the site also took place. No further meetings were proposed, pending receipt of formal comments from the environmental scoping report submission.
- 4.3.20. Key feedback from consultee: will provide landfill records for the area, will provide contact details for National Permitting office, require OPRA spreadsheet.
- 4.3.21. Key response by Covanta: OPRA spreadsheet to be provided
- 4.3.22. Flood risk was discussed at a meeting between Covanta, its team and the EA, on **21 May 2009**. The flood risk assessment carried out for the LLRS was introduced and the associated earthworks/engineering works described. The surface water management and drainage strategies were also described. The

EA confirmed that these were acceptable. Covanta's hydrologist explained that there was a 1 in 100 year flood risk when water from the Mill Brook tributary could spill into the pit. To reduce the risk of this, the Mill Brook tributary should be de-silted and, if this was not adequate to prevent flooding, other improvements were suggested for modelling. The EA were content that the scope of analysis was adequate and that Covanta's team should liaise with the Internal Drainage Board about watercourses down-stream of the Marston Vale railway line. The EA advised that any work to the Mill Brook would require consent from them and described the information required for such an application.

- 4.3.23. Key feedback from consultee: accept strategy and design criteria for LLRS and scope of analysis for RRF project.
- 4.3.24. Key response by Covanta: will use proposed scope for assessment work, will provide information as required for EA consent.

The River Ivel Internal Drainage Board

- 4.3.25. Covanta, their hydrological consultants and The Internal Drainage Board (IDB) met on **24 April 2009**. The IDB is responsible for the majority of the Marston Vale area but not Rookery Pit. Mill Brook outfalls to Stewartby Lake, which is operated and managed by the IDB, hence their interest in the Project proposals. Covanta's hydrologists have been in discussion with the IDB in relation to the LLRS being promoted by O&H Properties Ltd and the IDB accepts the drainage proposals for this scheme. The IDB are only concerned with the flow rate within the Mill Brook as it passes beneath the Marston Vale Railway Line. They confirmed that on a without prejudice basis they will not object to the RRF proposals as long as the surface water discharge regime is as per that agreed for the LLRS. They also confirmed that water quality is the responsibility of the EA. Covanta's consultant described the potential overspill into Rookery Pit during extreme rainfall events and said that they would model the scenarios to develop appropriate mitigation measures. Such measures would be designed so as not to increase flood risk downstream e.g. in the railway culvert.
- 4.3.26. Key feedback from consultee: on a without prejudice basis, will not object as long as regime is as agreed for the LLRS.

- 4.3.27. Key response by Covanta: will model Mill Brook, will develop flood mitigation measures for Rookery Pit which do not cause problems down-stream.

Anglian Water Services

- 4.3.28. Covanta's hydrologist first met Anglian Water Services (AWS) on **6 May 2009** to discuss AWS' Pre-Development Report, which details issues around the provision of new potable water supply and foul drainage disposal and treatment. Both systems would need to be upgraded to accommodate the proposals and Covanta would be making a contribution to the associated costs. Run off from the ash wash down area would be classed as trade effluent (TE) and discharge of this would require consent from AWS.
- 4.3.29. Key feedback from consultee: will provide details of available spare capacity of potable water for early phasing of the Project. Potable water would be supplied from Ampthill Reservoir. Upgrading of potable water supply system required to meet additional needs of Rookery Pit development. Will provide details of available spare capacity at the sewerage treatment works (STW). Confirmed it is seeking funding to upgrade STW to serve proposed Stewartby growth. Runoff from ash wash down area is classed as TE and will require consent.
- 4.3.30. Key response by Covanta: will provide details as requested and sought clarification of timetable for upgrading of STW. Will make contribution to costs associated with potable water supply upgrade.

Highways Agency

- 4.3.31. Covanta's transport consultant met the Highways Agency (HA) on **29 April 2009** to provide an initial briefing on the Project. Road access to the Application Site is proposed via Green Lane and the A421. The HA reported that a recent planning application had been conditioned requiring the A421 to be dualled and operational prior to occupation, due to concerns about capacity and safety at the existing A421 junctions in the area. The completion of the dualling scheme was expected to be towards the end of 2010. Covanta's transport consultant noted that the traffic impact of the Project would be limited, with the vehicular trip frequency similar to that for a previous proposal for the site, for which agreement had been reached with the HA and Bedfordshire County Council. The HA requested a transport scoping note for the Project and highlighted that use of the transport model prepared by others in relation to the dualling scheme would have to be formalised.

4.3.32. Key feedback from consultee: be aware of imminent work already agreed for the A421, submit transport scoping note.

4.3.33. Key response by Covanta: transport scoping note to be submitted.

Network Rail

4.3.34. On **1 May 2009** Covanta, their transport consultant and Freightliner, Covanta's railfreight partner, met Network Rail (NR). Covanta felt that providing rail access to the site for delivery of waste was unlikely to be an effective solution. However, this would need to be fully investigated. Covanta would review whether the existing rail connection and sidings previously used for Stewartby landfill could offer an alternative. NR confirmed that this line could provide the 1 train per day required by Covanta. NR stated that a large increase in vehicular traffic flow on Green Lane would necessitate upgrading the existing half barrier system to a full barrier system with CCTV or the introduction of a bridge. Covanta's consultants noted the relatively limited traffic movements associated with the Project.

4.3.35. Key feedback from consultee: contact named within NR for further discussions. Level crossing at Green Lane to be upgraded.

4.3.36. Key response by Covanta: team will liaise with this contact, will include provision of full barrier level crossing in Project.

NHS Bedfordshire and Health Protection Agency

4.3.37. On **6 May 2009** Covanta and their air quality and public health consultant met with Bedfordshire National Health Service (NHS) and the Health Protection Agency (HPA) to discuss how human health would be addressed in the application documents. Issues identified for consideration were disposal of fly ash, which comprises hazardous waste, road accidents (especially those involving vehicles carrying fly ash), use of rail to transport waste to site, monitoring of emissions during the operational phase and the possibility of residential development nearby. Covanta's consultant explained that the Environmental Statement accompanying the application would include: assessment of air quality impacts; a risk assessment of the additional exposure to metals and dioxins; and a quantification of the mortality and morbidity arising from the additional airborne concentrations of PM2.5, PM10, SO2 and NO2. Copies of such assessments for similar projects would be sent to the Primary

Care Trust (PCT) and HPA for internal consideration. The PCT and HPA were happy, at this stage, with this approach and a full health impact assessment was not considered likely to be necessary. The PCT would follow advice and guidance from the HPA and Environment Agency. The HPA considered that modern, well-run incinerators were not significantly harmful to human health and that emission monitoring was very important in demonstrating this.

- 4.3.38. Key feedback from consultees: comfortable with approach, will review similar assessments internally, consider health/traffic movements. Full HIA unlikely to be considered necessary.
- 4.3.39. Key response by Covanta: will issue copies of other risk and impact assessments for review by PCT/HPA.

4.4. Summary of key feedback from consultees during Spring 2009

- 4.4.1. From the feedback received from consultees during this period, the main points to be addressed are summarised below by reference to the relevant environmental issues.

Issue	Consultation Result
Visual/landscape.	Further consideration of stack arrangement, building form, and its contextual response.
Cultural Heritage.	Identified key views from heritage assets.
Transport.	Upgrading of level crossing required.
Utilities.	Upgrading of potable water supply and foul drainage systems may be required.
Health.	Full Health Impact Assessment unlikely to be necessary.
Ecology.	LLRS to form the baseline. No further baseline ecological surveys required.

4.5. Ongoing Consultation

- 4.5.1. The importance of ongoing consultation on design and addressing the potential impacts of the RRF were identified and the need for further meetings agreed.

5.0 Summer/Autumn 2009 Consultation

5.1. Introduction

- 5.1.1. During the summer period of June, July and August of 2009 Covanta engaged in significant public consultation in parallel with continued consultation with the technical and statutory consultees. Public consultation is described first followed by technical and statutory consultation.

5.2. Public Consultation

- 5.2.1. Following the informal EIA scoping meetings held with technical statutory consultees in spring 2009 (see section 4 above), a formal consultation in respect of environmental scoping for the Project was launched. This focussed on the formal section 36 Environmental Scoping Report. The content of this environmental scoping consultation was based on: feedback from the technical consultees; best practice; guidance; and Covanta's Communication Strategy of June 2009 (see para 2.5.1 and Appendix 1). The principal aims of the public consultation were:
- 1) to inform local people and stakeholders about Covanta's evolving proposals;
 - 2) to ensure a meaningful response to EIA scoping; and
 - 3) to enable stakeholders to express their views at an early and appropriate stage in the development of proposals for the Project.
- 5.2.2. The consultation was publicised through a number of mechanisms in June 2009.
- 5.2.3. Advertisements (please see Appendix 6 for a copy) were placed in the Bedford Times and Citizen (which has a circulation of almost 77,000) on 2 and 9 July 2009, and in Bedfordshire on Sunday (which has a circulation of approximately 102,500) on 5 July 2009 and invited members of the public to the exhibitions, listing venues, dates and times.
- 5.2.4. A direct mail letter was sent from the Managing Director of Covanta to almost 15,000 addresses within 5km of the proposals (please see Appendix 7 for a sample letter). These letters summarised the Project proposals and inherent benefits; invited the recipients to the exhibitions, listing venues, dates and times; stressed Covanta's desire to engage in comprehensive and meaningful

consultation; and gave the Covanta website address as a source of further information.

- 5.2.5. Some 230 individual letters were sent from the Managing Director of Covanta to all councillors in Central Bedfordshire, Bedford Borough, and Luton, parish councillors, local community representatives, landowners and developers and all others who had expressed an interest since the announcement of the Project (please see Appendix 8 for a sample letter and Appendix 9 for a full list of recipients). These letters invited recipients to attend a preview exhibition on 10 July 2009 at Stewartby Village Hall; stressed Covanta's desire to engage in comprehensive and meaningful consultation; summarised the Project proposals and its inherent benefits; listed the alternative exhibition dates should the recipient be unable to attend the preview; and gave the Covanta website address as a source of further information.
- 5.2.6. Copies (approximately 90) of the Environmental Scoping Report were also issued to all local representatives including MEPs, MPs, councillors, Town/Parish councillors, near neighbours, wildlife groups, the Environment Agency, English Heritage, Natural England and other statutory consultees and opinions invited.
- 5.2.7. A leaflet was made available in key public venues e.g. town/village halls, churches, post offices, newsagents (see Appendix 10). This leaflet emphasised Covanta's commitment to public consultation; described the Project proposals and why it is needed; explained the advantages of EfW; provided an illustrative overview of the Project in its context; described how the EfW process works; highlighted the existence of the Environmental Scoping Report and where it could be viewed and commented upon; and described how individuals could become involved, giving website, email and postal addresses for Covanta.
- 5.2.8. Posters were distributed throughout the area surrounding Rookery South (see Appendix 11). This listed the venues, dates and times of the public exhibitions; provided a map showing the location of the Project; invited attendance at the exhibitions, questions about, and ideas for, the emerging design; and gave the website and email addresses of Covanta.
- 5.2.9. A dedicated Rookery South RRF web page was established:
<http://www.covantaenergy.co.uk/site/rookerysouth>. Appendix 12 shows website screen shots of some of the pages of this site. The pages described the

Project, including an illustration and the environmental benefits of Covanta's operations worldwide;

- 5.2.10. Covanta established an online communications centre. In addition to the information held on the web pages referred to above, this provided a dedicated email address and freepost address so that further information could be sought. Eleven enquiries were logged over this time via the email address: 2 businesses/contractors showing an interest in working for Covanta; 4 Community Liaison Panel nominations; 1 complaint about wrongly addressed post; 1 request for a hard copy of the Environmental Scoping Report; 1 invitation to meet a local Parish Council to discuss the proposals; 1 query about access routes for construction and operational phases of the Project; and 1 query about commercial waste disposal. Covanta responded appropriately to each enquiry.
- 5.2.11. Public exhibitions were launched, to provide opportunities for face-to-face dialogue, questions and discussion and were advertised through the routes above. Copies of the exhibition boards are provided in Appendix 13. The exhibitions are described in greater detail below.

5.3. Public Exhibitions

- 5.3.1. Sixteen boards were displayed (please see Appendix 13). These provided information on the waste challenges and solutions in Bedfordshire, Covanta's proposals, the planning and EIA process, design considerations, environmental issues and quality of life, and the next steps in the process.
- 5.3.2. A preview of the exhibitions was offered to key stakeholders (MEPs, MPs, councillors of the relevant local authorities, local representatives, parish councillors, landowners and developers) in the area. These stakeholders were individually invited by letter as described above. Those unable to attend were invited to any of the six other public exhibitions, which were held throughout the Marston Vale on the dates below:

Friday 10 July 2009	Preview, Stewartby Village Hall	12-2pm
Friday 10 July 2009	Stewartby Village Hall	2-8pm
Saturday 11 July 2009	Parkside Hall, Ampthill	10am-6pm
Sunday 12 July 2009	Houghton Conquest Village Hall	10am-6pm
Friday 14 August 2009	Millbrook Village Hall	10am-8pm
Saturday 15 August 2009	Marston Vale Forest Centre	10am-6pm
Sunday 16 August 2009	Wootton Memorial Hall	10am-6pm

5.3.3. Figure 3.1 on page 38 shows a map of the area, with the village locations of the exhibitions visible. This illustrates the even distribution of venues, ensuring that as many local people as possible had the opportunity to attend an exhibition.

5.3.4. The exhibitions were staffed by senior Covanta staff; engineers; planners working on the Project; and a wider Project team of external consultants on noise, traffic, landscape and design, ecology, and air quality impacts. Following a request made at one of the July exhibitions, an Environment Agency (EA) representative was also present to answer questions on EfW at the August exhibitions. The EA representative attended in a strictly independent capacity.

5.3.5. Almost 500 people attended the public exhibitions, including representatives from the following groups and organisations:

- 1) Alameda Middle School
- 2) Ampthill Town Council
- 3) Ampthill Park House
- 4) BEaR project
- 5) Bedford Borough Council
- 6) Broadmead Lower School
- 7) Buckinghamshire County Council
- 8) Central Bedfordshire Council
- 9) Cranfield Parish Council

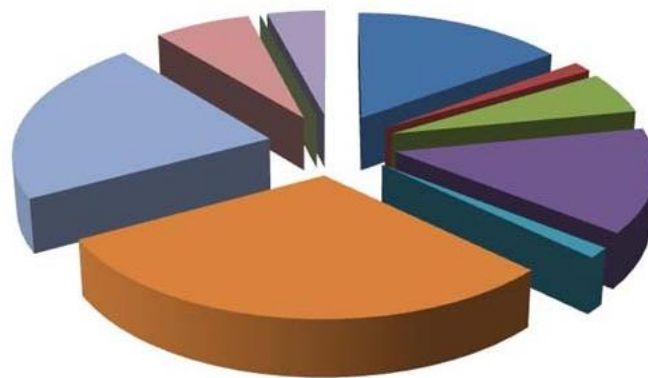
- 10) Cranfield University
- 11) CPRE Bedfordshire
- 12) Environment Agency
- 13) Forest of Marston Vale Trust
- 14) Gallaghers
- 15) Haynes Parish Council
- 16) Houghton Conquest Parish Council
- 17) Lidlington Parish Council
- 18) Marston Moreteyne Parish Council
- 19) Maulden Parish Council
- 20) Millbrook Golf Club
- 21) Millbrook Parish Meeting
- 22) Marston Moreteyne Action Group
- 23) O & H Properties
- 24) Ridgmont Parish Council
- 25) RevAmp
- 26) Sir Malcolm Stewart Homes
- 27) Stewartby Parish Council
- 28) Wootton Parish Council
- 29) The local MP, Nadine Dorries also attended

5.3.6. The list above demonstrates that a significant proportion of local organisations were represented at the exhibitions. Although attendance numbers as a proportion of the population were small, the local community was given a full opportunity to engage in the consultation process through these exhibitions. Other information was also widely available in the area as described above. Covanta operated a high-profile campaign to encourage attendance at the exhibitions running over two months to compensate for the summer holidays.

Feedback

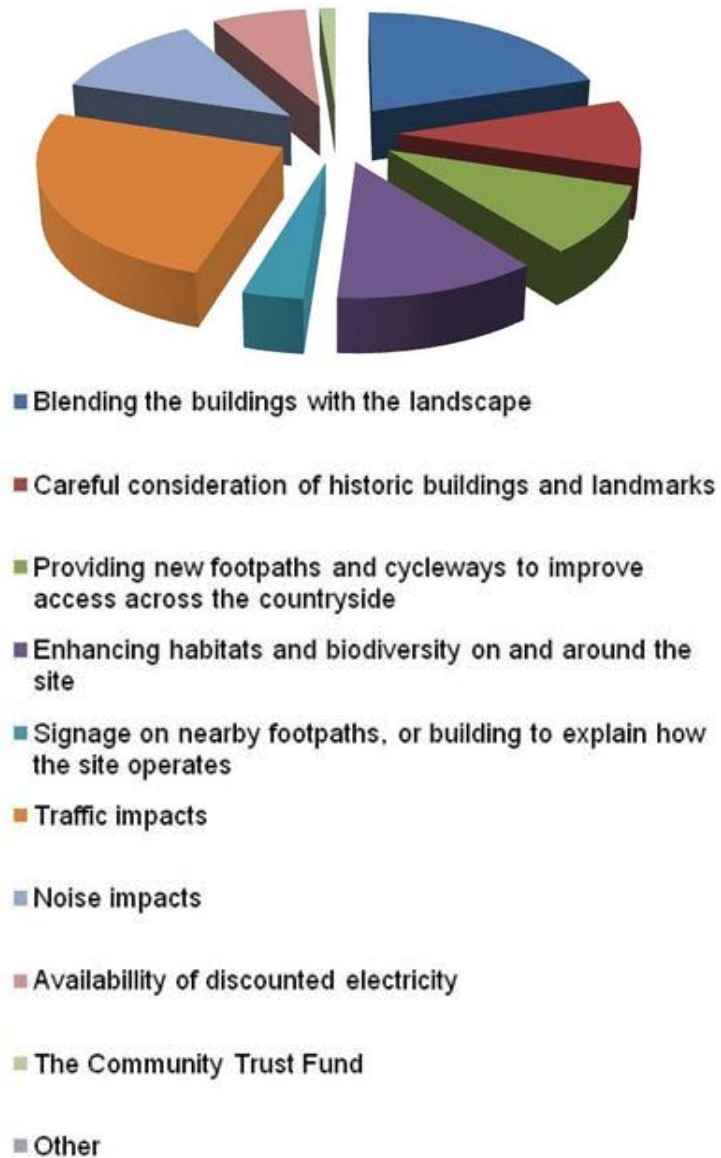
- 5.3.7. 99 people who attended the exhibitions returned a Feedback Form (see Appendix 14) and over 40 volunteered to become CLP members. A short summary of the feedback received is set out below:
- 1) 94/97 of respondents thought that it was important to find alternative ways to generate energy;
 - 2) also, 91/99 of respondents thought that generating energy from waste after recycling is a good option;
 - 3) focusing on The Rookery South RRF Project, 63/87 of respondents thought that the proposal was either excellent or good;
 - 4) the most important issues identified were traffic 81/297, blending the buildings with the landscape 54/297 and the impact of noise (50/297). Although 99 respondents returned forms, each was invited to list three top concerns, hence results are out of 297; and
 - 5) other notable concerns included enhancing habitats and biodiversity, careful consideration of historic buildings and landmarks, and discounted electricity.

5.3.8. The top issues for **Houghton Conquest**, which lies approximately 2.5km to the east of the Application Site, included the impact of traffic (30%), the impact of noise (22%), blending the buildings with the landscape (15%) and enhancing habitats and biodiversity on and around the site (13.5%). Please see pie chart below:



- Blending the buildings with the landscape
- Careful consideration of historic buildings and landmarks
- Providing new footpaths and cycleways to improve access across the countryside
- Enhancing habitats and biodiversity on and around the site
- Signage on nearby footpaths, or building to explain how the site operates
- Traffic impacts
- Noise impacts
- Availability of discounted electricity
- The Community Trust Fund
- Other

5.3.9. Similar concerns were identified in **Amphill**, which lies approximately 3km from the Application Site, including the impact of traffic (25%), blending the buildings with the landscape (20%), the impact of noise (12%) and enhancing habitats and biodiversity on and around the site (12%). Please see pie chart below:



5.3.10. In **Stewartby**, which is located close to the entrance to the Application Site and approximately 1km from the RRF, the most important concerns were similar: the impact of traffic (23%), the impact of noise (20%) and blending the buildings with the landscape (14.5%), but notably included the benefit of discounted electricity (11.5%). Please see pie chart below:



5.3.11. In **Millbrook**, which is approximately 2km south of the RRF, similar concerns were identified. As with all other areas the impact of traffic (23.5%), the impact of noise (12%) and blending the buildings with the landscape (12%) were identified as key concerns. In addition, careful consideration of historic buildings and landmarks was rated highly with (17.5%) and the availability of discounted electricity (12%). Please see pie chart below:



5.3.12. The feedback from the exhibition held at Marston Vale Trust **Centre** identified blending the buildings with the landscape, traffic impacts and noise impacts as issues of equal importance (22%). Other concerns identified were the provision of new benefits such as footpaths and cycleways to improve access across the countryside (11%) and the availability of discounted electricity (11%). Please see pie chart below:



- 5.3.13. No pie chart information for the Wootton Memorial Hall exhibition has been produced because the number of feedback forms returned was considered to be statistically insignificant.
- 5.3.14. A full breakdown of responses to each Feedback Form question is set out in Appendix 15.
- 5.3.15. The exhibitions were intended in part to disseminate information to the public, including the local community. The attendance of over 500 individuals reflects the success of the exhibitions in this respect. Covanta also sought information on key areas of the proposals and to understand the primary concerns of the public in relation to the Project to better inform its proposals.

Impact of feedback from the public exhibitions

- 5.3.16. Comments received at the events and those supplied in the Feedback Forms were considered by Covanta's team during the subsequent stages of the design iteration and the response by the Project to these is summarised below.

Design Elements

Consultation feedback	Project response
Minimise the visual impact of the Project.	Reduced building height by 7m, tightly wrapped internal technology, carefully considered external colour treatment, emphasised horizontal lines to reduce perceived height, minimised external lighting and removed south facing windows, added green wall to elevation facing Forest Centre, compared 3 stack to 1 stack option and found one stack minimised visual impact, reduced stack height from 115m to 105m, introduced shadow to break up building mass, avoided use of iconic architecture.
Integrate the Facility into the landscape.	Introduced earth bunding, native woodland planting.
Deliver Forest of Marston Vale objectives.	Introduced native woodland planting and enhanced Rights of Way.

Operational Elements

Consultation feedback	Project response
Avoid importing waste from outside Bedfordshire.	Waste Catchment Area was carefully considered, benefits of the Area as proposed outweigh the burdens.
Protect residents and businesses from unacceptable noise, traffic and air quality impacts.	Developed detailed noise model to calculate anticipated noise and identify mitigation; no Sunday deliveries proposed, most deliveries between 8am and 5pm, developed HGV Route Management Plan to ensure no HGVs through local settlements such as Stewartby, Marston Moretaine and Ampthill; worked to ensure reduced stack meets strict emissions requirements.
Consider rail transport of waste.	Commissioned Arup Rail report.
Do not crowd out recycling.	This was already assumed. The RRF will complement recycling and crowd out landfill through building in assumptions of high recycling into assessment of need for the Project.
Safeguard Airspace of Cranfield aerodrome.	Reduced stack height by 10m.

Community Benefits Elements

Consultation feedback	Project response
Reduce household energy bills.	10% rebate proposed for approx 8,000 homes closest to the site.
Improve village halls.	Community Trust Fund can be used for projects such as this.
Provide a Community Trust Fund.	Initial £150,000 then £50,000 per year thereafter is proposed. Covanta are also offering a Forest of Marston Vale Trust Fund of £250,000 initially and £50,000 thereafter.
Provide education and community facilities.	A Visitor Centre/ Education Facility is included in the main EfW building.
Enhance footpaths.	Covanta proposed a preliminary strategy to reconnect and enhance severed footpaths in and around Rookery Pit.
Enhance Marston Vale Trust.	Will be included through new planting and management of existing planting, Trust Fund mentioned above will also serve this purpose.

5.4. Technical and Statutory Consultation

- 5.4.1. Initial design concepts and a Building Code for the Project were developed within Covanta's design team (see 'Architectural Studies' handout, Appendix 16), following discussions between members of Covanta's professional team, which included engineers, planners, landscape architects and architects. These were then presented to the relevant local authorities, technical advisors and statutory consultees and agreed as a sound basis for progressing the building design.
- 5.4.2. In summer and autumn 2009 Covanta and relevant members of its team met with the following technical consultees and key stakeholders in relation to the Project:

Consultee	June 2009	July 2009	August 2009	Sept 2009	Oct 2009	Nov 2009
Local Authorities	✓✓✓		✓		✓	✓✓
English Heritage	✓		✓			✓
Anglian Water Services			✓	✓		
Fire and Rescue Service			✓			
Commission on Architecture and the Built Environment				✓ *		
Natural England					✓	
Wildlife Trust					✓	
Environment Agency	✓				✓	
Network Rail						✓
EDF				✓	✓	
Highways Agency						✓ *
Forest of Marston Vale				✓	✓	
Potential Combined Heat and Power users						✓
Cranfield Airport			✓	✓		

* Information sent for review

- 5.4.3. Set out below is a summary, by organisation, of meetings held, the key feedback from the consultee and the key responses to that by Covanta. Some meetings were attended by several consultees (e.g. 3 June meeting was attended by CBC, BBC and EA officers) and these are not described twice.
- 5.4.4. See Appendix 4 for meetings tracker, which shows when meetings occurred and who attended.

Local Councils

- 5.4.5. On **3 June 2009** Covanta and appropriate members of their team met Environmental Health Officers (EHOs) at BBC and CBC and representatives from the EA. The stakeholders stated that they required the noise assessment to be compliant with BS4142, confirmed acceptable hours of construction, confirmed nearest noise sensitive receptors and discussed monitoring locations. Confirmation that deliveries would not be 24 hours per day was requested and lux levels of external lighting were queried. It was agreed that assessment of recreational receptors would be useful. The EA representatives present requested a noise management plan, requiring an annual check, be included with the Environmental Permit application to ensure that no creep in noise levels occurs.
- 5.4.6. Key feedback from consultees: confirmed requirements and parameters, asked for information on external lighting and lux diagrams, requested confirmation that deliveries would not be 24 hrs/day.
- 5.4.7. Key response by Covanta: will confirm deliveries are not 24 hrs/day, will address lighting queries, will carry out baseline noise survey, will develop appropriate methodologies. The application of BS4142 as the only assessment tool was not accepted.
- 5.4.8. On **15 June 2009** Covanta and its traffic consultants met with local highway authority officers for BBC and CBC. The proposed site plan and Green Lane junction plan were tabled. Operational traffic movements were discussed. The officers gave a limited response regarding traffic impact but felt the key issue was the routing of refuse collection vehicles and how this would affect local roads. A proposed ghost island junction on Green Lane was discussed. The officers felt that an acceptable solution could be found. They requested a Stage 1 Road Safety Audit be undertaken to accompany the application. The officers also requested a brief scoping note describing the principles of the proposal and contents of the Transport Assessment, prior to the application being submitted.
- 5.4.9. Key feedback from consultees: requested scoping note. Ghost island junction capable of being acceptable as design approach.
- 5.4.10. Key response by Covanta: provided scoping note (on 18 November 2009).

- 5.4.11. On **26 June 2009** Covanta issued the Landscape and Visual Impact Assessment (LVIA) methodology to CBC. On **24 August** Covanta issued the same methodology to BBC. On **4 September** BBC responded, accepting the LVIA methodology. The CBC response is recorded in Chapter 7.
- 5.4.12. On **26 June 2009** Covanta issued the Cultural Heritage Impact Assessment (CHIA) methodology to CBC. On 24 August Covanta issued this to BBC.
- 5.4.13. On **19 October 2009** members of Covanta's CHIA team met a planning officer and a conservation officer of BBC to discuss these issues. Covanta's team described the scoping strategy and methodology for the Assessment. BBC were asked to list what heritage assets in the borough they considered to be particularly significant in relationship to the proposed development. The following listed buildings, parkland and Conservation Areas were raised: Hinwick House, Wootton, Cardington Hangars, Stewartby, Elstow Abbey, Wilstead, Cotton End, Bromham Hall, some of the taller listed buildings in Bedford (e.g. Church of St. Paul). Covanta's team agreed that these sites would be reviewed within the CHIA. The conservation officer for BBC suggested a viewpoint for analysis which would show the impact of the proposed development on Cardington Hangars and Stewartby Stacks and Covanta's team confirmed that viewpoints are to be discussed during a site visit with English Heritage. BBC officers confirmed that Stewartby, despite its lack of a Conservation Area Appraisal, is a valuable heritage asset.
- 5.4.14. Key feedback from consultees: listed key heritage assets likely to be affected.
- 5.4.15. Key response by Covanta: will include these in the assessment.
- 5.4.16. Covanta's Archaeologist met with CBC's Archaeologist on **6 November 2009** to discuss the proposed CHIA and agree the likely scope of Environmental Impact Assessment work on direct construction impacts. It was agreed that particularly sensitive sites included the cluster of records relating to the medieval settlement of Marston Pilling, centred on South Pilling Farm and the cropmark ring ditch to the south of Rookery Pit. The Council's archaeologist regarded the retention of Rookery Pit as an open pit, rather than being filled in or flooded, as positive. He was concerned that proposed tree planting affecting the cropmark ring ditch (and consequent root growth) may be a potentially destructive activity. A standard pre-determination evaluation, comprising a detailed magnetometer survey and 5% trial trenching, in this area

would be required if this was to be progressed. Evaluation of very small areas of planting would not be required. The results of the pre-determination evaluation would establish the need, or not, for further archaeological work, which in turn could result in revision of the landscape proposals. The County Archaeologist also raised the issue of palaeontology and the potential for disturbance of significant Mesozoic fossils. Covanta's archaeologist confirmed he would raise this with Covanta's EIA team.

5.4.17. Key feedback from consultees: listed sensitive sites, requested pre-determination evaluation.

5.4.18. Key response by Covanta: agreed to carry out pre-determination evaluation and respond according to results, will not propose any tree planting on crop-mark ring ditch.

English Heritage

5.4.19. EH, Covanta and its team met on **17 June 2009**. Covanta's team outlined the principal views which will influence the building design and site planning as being along the Greensand Ridge from heritage assets, views from the Forest Centre (west), views from Stewartby (north). Images showing the original curved roof building and an alternative, more angular version were shown and the benefits of the latter in wider views were discussed. Further studies of single and 3-stack options were also shown and a general consensus that a single stack was more appropriate than 3 'cricket stumps' in the landscape that could not be adequately separated to echo the Stewartby Stacks. The impact of the latter in certain views was discussed. The slenderness of the stacks was discussed and EH requested comparisons with the existing brick chimneys in Stewartby. Covanta's team agreed to progress these. Covanta's team also described how planting proposals around the pit perimeter and on earth mounds to the south and east of the site would contribute to integrating the building into the landscape. Covanta's designers explained the design concept for the EfW Facility as being honest and functional and that this would be expressed in the plan and building where possible. EH said that a meeting in six weeks time should demonstrate progress on building design and stacks.

5.4.20. Key feedback from consultees: prefer revised, less iconic, more honest building form: prefer 1 stack to 3: requested comparison to existing brick chimneys, requested another meeting, with images, to discuss the above.

- 5.4.21. Key response by Covanta: design to be progressed as discussed, LVIA and CHIA methodology to be issued (this was done on 26 June 2009) and another meeting arranged.
- 5.4.22. On **13 August 2009** EH and landscape, archaeology and conservation officers from CBC met with Covanta and its team. The CHIA scope was discussed and broadly agreed, with the CBC archaeologist raising the issue of below ground archaeology and others suggesting the addition of some more heritage assets. 16 viewpoints were agreed with the CBC landscape officer and sent to EH. These would be circulated to CBC archaeology and conservation officer and relevant officers in BBC for agreement. EH and the CBC landscape officer were happy with the scope and methodology of the visual impact studies. Covanta's designers presented a design approach update with reference to an architectural studies document (see Appendix 16). The developments in the design were described: the building had become more responsive to its context, reflected the process carried on within it to a greater degree, was more integrated into the landscape, and had one stack of three flues joined together. EH confirmed that they preferred the current, more angular, design and the amalgamation of the three flues into one stack as a resolution to the single stack solution. The CBC Conservation Officer wished to understand the change of direction in the design more fully.
- 5.4.23. Key feedback from consultees: 1 stack solution preferred, more angular building preferred, some final matters relating to methodology for EIA to be agreed, attending CBC conservation officer to be fully briefed on design development of scheme, BBC officers to be consulted.
- 5.4.24. Key response by Covanta: meeting with BBC officers arranged, CBC conservation officer to be further briefed, methodology to be agreed, site visit arranged.
- 5.4.25. On **5 November 2009** relevant members of Covanta's team accompanied EH and the CBC conservation officer on a site visit to agree assessment viewpoints for the Cultural Heritage chapter of the Environmental Statement. The relevant officer from BBC was also invited but could not attend. EH requested some additional viewpoints. These were agreed with Covanta's team, as was the fact that views from Wrest Park, Woburn and Cardington Hangars will not be an issue. It was also agreed that there were no issues in

relation to the setting of the churches previously identified or Wilstead or Houghton Conquest churches. EH requested further justification of the building height. They intended to have an internal meeting to review the information before providing an opinion. EH were keen to understand the character of the stack plume and its frequency and duration.

5.4.26. Key feedback from consultees: additional viewpoints required, information on stack plume required, feedback will be provided after internal meeting

5.4.27. Key response by Covanta: will provide further technical information in support of understanding selection of technology and relationship to building height, will assess additional viewpoints and provide stack plume information for internal EH meeting.

Anglian Water Services (AWS)

5.4.28. Covanta's hydrology consultants met AWS on **13 August 2009**. They discussed potable water supply to and foul drainage from the RRF. Potable water would be supplied from Ampthill Reservoir. Run off from the ash wash down area would be classed as trade effluent (TE) and discharge of this would require consent from AWS.

5.4.29. Key feedback from consultee: there is insufficient flow to accommodate peak flow of 20l/s of foul drainage (as advised by Covanta) without upgrading the existing network and pumping station. Other planned development in the area may take up spare capacity. The EfW alone would not create a capacity issue for the foul sewerage system, but flows above 10.5 l/s may do. TE to be discussed with a TE inspector. Will require information on design of system proposed if it is to adopt the pumping station and rising main. Local watermain has capacity for supplying only 1 l/s peak flow of potable water, therefore system will need to be upgraded and Covanta to contribute to cost of this.

5.4.30. Key response by Covanta: will issue design information in due course.

5.4.31. On **15 September 2009** Covanta's hydrology consultants met AWS to discuss TE and foul discharge issues.

5.4.32. Key feedback from consultee: requested information on proposed foul flows be issued again direct to AWS Catchment Quality Scientist. Will respond to information supplied to date with advice on how to deal with TE in principle.

- 5.4.33. Key response by Covanta: please review information as a matter of urgency as feedback will influence design of pumping station design and need to agree 'in principle' arrangements for planning application.

Bedfordshire and Luton Fire & Rescue Service

- 5.4.34. On **12 August 2009** Covanta and their hydrological consultant met with an officer of Bedfordshire and Luton Fire and Rescue Service (BLFRS). The officer outlined BLFRS requirements for access and water supply and requested a full set of drawings to allow BLFRS to review the proposals in more detail and provide constructive comments and advice. Covanta stated that the BLFRS are free to visit The Rookery site and that they could speak directly to the Dublin Fire service about Covanta's scheme in Dublin, if this would be helpful. The BLFRS proposed that they carry out training exercises during the construction phase of the Project.
- 5.4.35. Key feedback from consultee: require full set of drawings for further in-house review.
- 5.4.36. Key response by Covanta: will provide drawings as requested once these are available.

Commission for Architecture and the Built Environment

- 5.4.37. Covanta instructed its design team to consult the Commission for Architecture and the Built Environment (CABE) in response to PPS 1, where reference to CABE's potential interest in such projects was indicated. Covanta contacted CABE and an agreement to undertake an informal pre-application review was made. A case officer was appointed and advised. On **14 September 2009** CABE was issued with the 'Architectural Studies' document (see Appendix 16). CABE responded and requested further information about some aspects of the Project.

Natural England and Wildlife Trust for Beds, Cambs, Northants and Peterborough

- 5.4.38. Covanta's ecological consultant met NE and the WLT on **8 October 2009**. At this meeting the baseline for the ecological assessment was agreed. A follow-up email from NE confirmed two outstanding issues about receptor site preparation.

5.4.39. Key feedback from consultees: can assume in baseline condition for assessment that the Review of Old Minerals Plan (ROMP) scheme has been implemented.

5.4.40. Key response by Covanta: will proceed on this basis.

Environment Agency

5.4.41. On **14 October 2009** Covanta's hydrologists consultants met the EA to update it with current proposals for surface water drainage and flood risk management strategy and associated design principles. The EA confirmed that the flood risk management strategy was sufficiently robust and that the capacity of the proposed balancing pond was adequate to accommodate both residual risk scenarios modelled for surface water drainage. A hydraulic model of the Mill Brook and its tributary had been carried out by Covanta's consultants and showed that in a 1 in 100 year plus climate change event floodwater would spill from the tributary into a low lying area along the south eastern side of Rookery South Pit. Channel improvements along the tributary would prevent this, but would increase flood flows and levels down-stream and therefore Covanta's consultants had developed alternative methods for surface water management. The EA confirmed that the flood risk management strategy is considered sufficiently robust and after further discussion, and agreement to undertake further modelling by Covanta's consultant, that the requirements of the risk-based sequential test were satisfied.

5.4.42. Key feedback from consultee: accept strategy as discussed.

5.4.43. Key response by Covanta: will provide information as required for EA consent.

Network Rail

5.4.44. Covanta and its transport consultant met with NR on **12 November 2009**. Green Lane traffic modelling undertaken by Covanta's team was outlined and it was reported that the modelling demonstrated that traffic will not block the level crossing. Discussions suggested that access proposals were acceptable, subject to the traffic modelling being presented in full to NR. The highway access road alongside Rookery North would include a vehicle safety barrier, specification of which is to be agreed with the highway authority. The boundary between NR and O&H Properties Ltd land would need to be secured. NR requested that this is done with a close boarded fence 1.8m high to prevent

vehicle headlights dazzling train drivers. Light should also be prevented from spilling from columns onto the rail line. NR was not aware that EDF Energy was proposing to install cable ducts beneath the railway. Covanta's consultants agreed to pass EDF Energy contact details to NR. Notice periods for work were discussed. The Mill Brook watercourse culvert was discussed. NR requested a condition survey of this to be carried out. NR has a list of approved species for planting adjacent to railways and will issue this to Covanta for use by their landscape architects. NR highlighted their guidance for the extent of crane swings adjacent to railways. NR will issue this guidance to Covanta.

5.4.45. Key feedback from consultee: require fencing for security and to prevent dazzle, requested demonstration of traffic modelling for level crossing, will issue approved species list and crane guidance.

5.4.46. Key response by Covanta: will issue contact details for EDF, and include above requirements in design.

EDF Energy

5.4.47. Two meetings were held with EDF Energy, one on **11 September 2009** and one on **19 October 2009** to discuss the formal grid connection (export/import) applications submitted to EDF Energy on 14 October. No formal minutes were taken but discussion included review of electricity supply to the proposed development, grid import/export arrangements and the application process, the cabling beneath the railway and the programme for delivery.

Highways Agency

5.4.48. On **18 November 2009** Covanta's transport consultants issued a Transport Assessment scoping note to the Highways Agency (HA), CBC and BBC. Responses to this were issued by the HA on 7 December 2009, by CBC on 15 December 2009 and BBC on 18 December. The consultees were generally content with the scope suggested as it followed guidelines set out by the Department for Transport but proposed inclusion of some additional information.

Marston Vale Trust

5.4.49. The first meeting with the Marston Vale Trust (FVT) was held on **15 September 2009**. It was attended by Covanta, relevant members of their team and MVT. The strategic approach of the Project and an understanding of the

context of the site especially in relation to the Marston Vale was outlined, current design of the site and building at that point in time was presented in relation to the different audiences. MVT noted its concern about the size of the building and how its proximity to their centre would affect the visitor experience, and potentially impact on the Trust's income. The treatment of the western elevation of the proposed EfW Facility, which faces the Trust's building, was particularly important. MVT liked the landscape strategy and were supportive of proposals to extend the rights of way.

- 5.4.50. Key feedback from consultee: concerned about the scale of the building, positive about landscape strategy and extending rights of way and noted contextual understanding of Project.
- 5.4.51. Key response by Covanta: will issue full panorama images, will progress design work on western elevation and massing, will issue programme of milestone dates, will organise further meeting.
- 5.4.52. A second meeting with MVT was held on **9 October 2009**. Optimising Rookery North as an extension of Millennium Country Park in terms of ecology and biodiversity was discussed. Access (rights of way and visitors) was also examined as were water management opportunities. Design development since the last meeting was reviewed including the development of a green roof over the tipping hall to present a 'greener' face to the Visitor Centre. The impact of the Project upon the Forest Centre and Country Park was considered. Environmental contribution to Marston Vale Trust, as supported by planning policy, was discussed.
- 5.4.53. Key feedback from consultee: MVT were pleased with development of western elevation, consideration to be given to Green Lane as a second entrance to the Country Park, green walls could be considered and a stepped ridgeline that did not appear too uncompromising in views from the Forest Centre. MVT to consider any further opportunities relating to water management and consider concept of footbridge over the rail line to establish links
- 5.4.54. Key response by Covanta: will consider green walls and Green Lane opportunities and report back. Will further investigate access into North Lake and consider its future management and prepare montage with existing forest growth illustrated over time.

- 5.4.55. On **12 October** Covanta's ecologist met the MD, and Forest Manager, of MVT, on The Rookery South Pit site for a guided tour.

Potential Combined Heat and Power Users

- 5.4.56. Covanta carried out desk top studies using Google Earth to identify potential CHP users, resulting in a presentation to ASDA, which has an existing cold storage and distribution centre 3.5 km north of the Application Site. This was followed by discussions with local developers and landowners to identify other potential users within 5km of the site and those below were highlighted:
- 1) Center Parcs: consented development for 450 holiday units and associated leisure facilities;
 - 2) Nirah: consented development of a visitor attraction;
 - 3) Wixams: ongoing mixed use development comprising up to 6,000 new homes;
 - 4) Stewartby: consented development of 450 new homes
 - 5) Marston Moretaine: consented development of 750 new homes (in an area not connected to the gas network); and
 - 6) Millbrook Proving Ground: potential new on-site commercial development.
- 5.4.57. In early **November 2009** Covanta also contacted each of the following key stakeholders to identify potential local users of heat:
- 1) The National Combined Heat and Power Quality Assurance Team;
 - 2) Government Office East of England Team;
 - 3) East of England Development Agency;
 - 4) East of England Regional Assembly;
 - 5) Central Bedfordshire Council;
 - 6) Luton Borough Council;
 - 7) Bedford Borough Council;
 - 8) Renewables East; and
 - 9) Renaissance Bedford.

- 5.4.58. The only potential user identified through this consultation, in addition to those listed at paragraph 5.4.56, was a site at Fields Road, Wootton.
- 5.4.59. The document "Combined Heat and Power Development Strategy", which accompanies the DCO application, describes this element of the Project in full.

Cranfield Airport

- 5.4.60. On **17 August 2009** Covanta and its aviation consultant met representatives from Cranfield Airport. Covanta described the Project, the planning application process, and how it related to aircraft activity at the Airport.
- 5.4.61. Key feedback from consultee: have planning permission for an airpark with potentially 30,000 jet movements. DAP (Directorate of Airspace Policy, a group within the Civil Aviation Authority) are developing new procedures for Runway 03, to include DME (Distance Measuring Equipment) approach. They are also considering installing radar. Note that emissions from Stewartby chimneys, when operational, caused emergency calls for 'smoke in the cockpit' to the airport. Requested additional information about the stack and emissions: height, smells, clouds or fog. Queried whether gliders could use thermals from the stack to gain height. Take note of helicopter operations at Helimeck, Millbrook Proving Grounds and police helicopter operations. Queried whether Covanta has contacted the military. A BAE 146 aircraft, which operates at circa 410ft, is authorised to undertake low level atmospheric testing operations at the airport. Asked about obstruction lighting.
- 5.4.62. Key response by Covanta: please notify DAP of Project for consideration when developing new procedures. In relation to obstruction lighting, the scheme would comply with CAP 168 (a Civil Aviation Authority document, which sets out the criteria which must be met in order to obtain an airport operating license) but aim to minimise visual impact on local surrounding communities. Will provide further information on emissions and confirmed had consulted MOD.
- 5.4.63. On **2 September 2009** Covanta's design and aviation consultants met representatives of Cranfield Airport again to introduce the environmental aspects of the Project.
- 5.4.64. Key feedback from consultee: draft of Runway 03/21 procedure will be issued on 29 September 2009. "Windsock" helicopter approach to the airport was from

overhead the Millbrook Proving Ground. DME navigational equipment would be operational by October 2009.

- 5.4.65. Key response by Covanta: answered questions regarding emissions from the stack.

5.5. Summary of consultation impacts on design Summer and Autumn 2009

- 5.5.1. From the feedback received from consultees during this period, the main points to be addressed are summarised below by reference to the relevant environmental issues.

Issue	Consultation Result
Visual/landscape	Building mass significantly reduced and form more angular. 1 stack option agreed. Colour of building revised. Chimney height minimised. Brown roof and green walls considered for west elevation. Additional area of land to be acquired for planting. Tree planting and extensive bunding added.
Community Benefits	Enhanced footpaths, Trust Fund principles considered, support for reduced electricity bills.
Biodiversity	Wetland habitats included, brown roofs and green walls considered
Cultural Heritage	No tree planting on crop mark ring ditch to protect archaeology. Views for photomontages agreed
Transport	Ghost island junction on Green Lane likely to be acceptable. Fencing and lighting to avoid dazzling train drivers. Continue preparation of rail report to consider viability.
Surface Water	Flood risk management strategy confirmed as robust.
Noise	Confirmed deliveries would not be 24 hrs/day.

5.6. Ongoing Consultation

- 5.6.1. The architectural study (Appendix 16) defined an approach to the design of the Project permitting more meaningful, detailed and wider consultation to be undertaken including with MVF, the CLP, EH, CBC, BBC and the public. Having undertaken considerable design development the next stage of consultation was focused on exploring the emerging design ideas with statutory consultees in greater detail and establishing the work of the CLP further.

6.0 Community Liaison Panel

6.1. Introduction

- 6.1.1. During September 2009 the CLP was launched.
- 6.1.2. The panel has been facilitated by an independent chartered marketer (see Appendix 18 for details of the facilitator and her experience), who has attended meetings and circulated information between meetings.
- 6.1.3. In summary, her overall conclusions about the CLP process, as quoted from Appendix 21, “Review of The Rookery South RRF Community Liaison Panel Process”, are:

1) In my opinion the CLP has met its purpose of constituting a representative Panel from the local community, of enabling this group to articulate their concerns in a constructive and structured way, and providing Covanta with a two way communications channel to the community.

2) The CLP can be improved of course, and a suggestion for fewer agenda items to allow more in-depth debate is one I can implement immediately. I will also continue to ask CLP members for their issues and ensure that responses to these are provided by Covanta.

3) The CLP process has not changed members' attitudes towards the proposal, but they do feel that they understand the range of impacts and are better prepared to comment on the proposals once they are submitted to the IPC.

6.2. Purpose

- 6.2.1. Covanta is committed to engagement with its host communities and the use of liaison panels to achieve this. The CLP was set up by Covanta based on appropriate good practice, its experience elsewhere, and in response to interest expressed by the local community. It is a key part of the communications arrangements in respect of the Project, which have been put in place in order to ensure effective dialogue about the Project between Covanta and the local community. The terms of reference for the CLP include the following areas (see Appendix 17 for full Terms of Reference):

- 1) to identify and respond to issues of local concern;
- 2) to better understand local concerns;
- 3) to provide a channel so those issues can be articulated;
- 4) to help inform and educate local opinion-formers;

- 5) to provide a structured arena for constructive debate;
- 6) to hear how best to communicate with the local community;
- 7) to update the local community on the progress of the development; and
- 8) to resolve any questions that may result from the construction and operation of the proposed Rookery South RRF.

6.2.2. Covanta regards the CLP as an independent body, which it funds and which is independently facilitated. At its meeting on 15 March 2010, the CLP asked specifically that this Consultation Report makes clear that membership of the CLP does not indicate support for the Project. Covanta's philosophy is entirely aligned with this approach and it is content to do so. Indeed, the CLP Terms of Reference (see Appendix 17) includes the following:

Membership of the CLP does not imply support for or objection to the RRF proposals. Rather, it is an opportunity to facilitate the flow of information between Covanta and the local community.

6.2.3. The CLP will continue meeting throughout the planning process and, if development consent is granted, is proposed to continue during the construction and operational phases as well, which would be secured by a development consent obligation.

6.3. Selection of CLP Members

6.3.1. The CLP was formed following the 2009 EIA Scoping Consultation exercise. A list of volunteer/members was compiled and the independent facilitator selected members. The members of the CLP include representatives of community groups for each parish within 5 km of The Rookery South site, a number of local organisations and closest neighbours (within 3km).

6.3.2. Based upon the expertise of the facilitator, a total membership of fourteen is the maximum number that can sensibly enable each person sufficient opportunity to give their views. However, late requests to join by Ampthill Town Council and a councillor from Bedfordshire Borough Council were granted by the CLP at its first meeting, which has increased the number of members (see Appendix 19 Rookery South RRF CLP Meeting 1 notes). A mix of men and women form the membership, although it could be argued that women are under-represented, and arguably parish councils are over-represented. However, all members are fully committed to the CLP.

6.3.3. The present members of the CLP are recorded below. There have been some changes in the membership of the CLP but the aim has always been to maintain a representative body of attendees as described above.

6.4. Members

Nigel Millway	Chair of Revamp Ampthill
Hugh Roberts	Marston Moreteyne Action Group (MMAG)
Barry Halton	Volunteer with Beds CPRE
Kim Hewlett	Head Teacher, Broadmead Lower School (past member)
Tony Talbot	Managing Director, Forest of Marston Vale
Tim Hill	Bedford Borough Councillor (past member)
Gary Summerfield	Ampthill Town Council/Central Bedfordshire Councillor
Lisa Frangiamore	Houghton Conquest Parish Council
Jennie Thomas	Millbrook Parish Meeting
David Cooper	Stewartby Parish Council
Alan Barnard	Maulden Parish Council
Peter Neale	Marston Moreteyne Parish Councillor
Richard Franceys	Resident
Ed Hiam	Resident
Ian Thomkins	Resident (past member)

6.4.1. In addition to the members, meetings are attended by:

- 1) Covanta representatives as appropriate, including the Managing Director; Director of Engineering; Director of Planning; technical specialists;
- 2) Representatives from the EA and CBC and BBC Joint Waste Planning Team (from 26 April 2010 and 24 May 2010 respectively) as observers only; and
- 3) Kate Fairweather, the Independent Facilitator.

6.5. Meetings

Dates

6.5.1. The CLP has met thirteen times:

- 1) 22 September 2009
- 2) 6 October 2009
- 3) 20 October 2009
- 4) 16 November 2009
- 5) 14 December 2009
- 6) 25 January 2010
- 7) 22 February 2010
- 8) Site visit 28 February 2010
- 9) 15 March 2010
- 10) 26 April 2010
- 11) 24 May 2010
- 12) 21 June 2010
- 13) 19 July 2010

Subject matter

6.5.2. Attendance at meetings has been good: to date, the average number of attendees per meeting has been 10 out of 15 members. In summary, the topics of presentation and discussion, sometimes requested by the members and at other times suggested by Covanta, were:

- 1) building design and landscaping;
- 2) noise impact assessment;
- 3) traffic impact assessment;
- 4) air quality impact assessment;
- 5) waste sourcing and volume;
- 6) plans for Combined Heat and Power;
- 7) planning application process and IPC process;

- 8) key policies against which the application will be determined;
- 9) public consultation strategy;
- 10) content of the Preliminary Environmental Report;
- 11) potential to reduce building size;
- 12) EfW processes, power production, dimensions;
- 13) carbon credentials of EfW;
- 14) plume visibility; and
- 15) community benefits consultation.

Format

6.5.3. A typical meeting format would be as follows:

- 1) the agenda is set by the members at the end of the previous meeting;
- 2) presentations are given by Covanta and/or members of its design team;
- 3) members ask questions and/or for further information to be given at a later meeting, if necessary. The approximate ratio of 1:1 for presentation to question time is usual. Questions have been many and wide-ranging and Covanta has ensured that specialists are in attendance to present, and answer questions about, technical issues where necessary;
- 4) the agenda for the following meeting is set, with further requests for items to be added received in the interim, via email;
- 5) meetings are programmed to last 2 hours but often extend to 2.5 or 3 hours, depending on the number of questions raised; and
- 6) following each meeting, record notes are prepared by the independent facilitator and posted on the Project pages of Covanta's website. The notes are made available for the general public to read via this medium.

Participation

6.5.4. As quoted from the independent facilitator's report (Appendix 21):

All members of the CLP make contributions to discussions and ask questions on a wide range of issues. Some research topics so that they are able to discuss some of the more technical issues in more depth, and ask for additional information, but Covanta makes available specialists to make the presentations who in most cases are able to cover these issues in a way that

non-specialists are able to understand. In some instances the CLP members have felt that presentations have provided technical data rather than information and they have asked for further presentations on these issues.

There have been some areas where the complexity of the subject have required several inputs – in some cases this is because CLP members needed some time to digest the material in order to ask pertinent questions, in other cases such as building design and landscaping, traffic, noise and air quality impacts Covanta's consultants have been presenting a developing case and sought CLP input to this. The majority of information provided in response to CLP questions has been made at the meeting where the presentation was made; occasionally it has been provided after the meeting and circulated with the notes.

Where the CLP has fed back that they do not feel the information presented at a meeting has been sufficiently in depth Covanta have brought the issue back to the next available meeting to address the specific issues raised.

The CLP regularly communicates among its constituent members via email about queries that they have, which prompts a wide range of added value questions and issues.

The CLP has also debated the CLP process itself on a number of occasions:

After the first meeting a panel member resigned because they felt that being part of the CLP indicated support for the proposal – in response to this Covanta proposed the following addition to the Terms of Reference: "Membership of the CLP does not imply either support for or objection to the RRF proposals" and this change was accepted by the CLP at the second meeting in October 2009.

At the November 2009 meeting the CLP discussed the issue of participating in the consultation process as a view was expressed that participating in the CLP was helping Covanta to make its case and that this was not in the interest of groups opposed to the Project. The consensus view from this discussion was that the members were there to provide information on issues of concern to the local community to produce a proposal that, should consent be granted, would be as acceptable to them as possible, and so are committed to participating in the consultation process. This does not in any way mean that CLP organisations would not object strongly to the Covanta proposals if that was felt to be appropriate.

At the March 2010 meeting some CLP members stated their serious concern that the IPC would view the CLP process as indicating that all CLP members had received information and therefore supported the proposal when they do not. It was agreed that the revised Terms of Reference did make it clear that CLP membership did not imply support of the Project, and Covanta took an action from the meeting to ensure that this point is made clear in the section 37 Consultation Report that goes to the IPC.

Some CLP members also said at the March meeting that they felt that the depth of concern they felt about the project was not being reflected in the meeting notes. This view was not shared by all members who felt that the notes were an adequate record of the information provided, but I took an action to continue to ensure the notes convey a balanced representation of the depth of feeling CLP members express. CLP members also undertook to review the notes when they were issued to ensure that they were satisfied with their accuracy. No further issues have been raised on this subject.

- 6.5.5. A summary of each meeting is given below. The full agenda, notes and supporting documents for each meeting can be found in Appendix 19 to this report. Appendix 20 shows the information requests made by the CLP outside meetings (and therefore not covered in meeting notes) and what was provided by Covanta in response.

Meeting 1

- 6.5.6. 22 September 2009, 13 members attended.
- 6.5.7. At this meeting the main topics of discussion were: set up of the CLP; building design; and air quality/public health issues.
- 6.5.8. 3 sets of supporting documents were provided by Covanta: Terms of Reference of the CLP; Rookery South RRF Architectural Studies; Air Quality and Public Health.
- 6.5.9. Presentations were given: Building Design; and Air Quality/Public Health.

Outcomes of the meeting: the following were the main items of concern to the CLP:

Key CLP feedback.	Covanta's response or number and date of meeting at which it was addressed, and how, by Covanta.
Visual and noise impacts: can the building be lowered in the landscape? Could it be hidden with planting?	Design is undergoing iteration and is not fixed. Further discussed at meeting 3, 20 October 2009, presentation.
What would happen if the plant monitoring showed excessive emissions?	The EA would require Covanta to close the plant, although Covanta would be given the opportunity to try to address the issue. Also discussed at meetings 9, 26 April and 10, 24 May 2010.
Source and type of the waste to be used; is it truly non-recyclable? What is the annual waste production of the UK now and up to 30 years ahead?	Meeting 2, 6 October 2009, presentation.

Key CLP feedback.	Covanta's response or number and date of meeting at which it was addressed, and how, by Covanta.
Will any recycling occur at the plant?	Meeting 2, 6 October 2009, presentation.
Will the area smell when the plant is not running?	No, waste will always be moving.
Will all waste deliveries go straight into the tipping hall?	Yes, but there may sometimes be short queues.
Should residents agree to any further increase in pollutants in the area?	Landfill also causes pollution, as do other methods of dealing with waste. Air quality standards will have to be met.
Why doesn't Greenpeace give incinerator technology a clean bill of health?	The EA, HPA and DoE accept that modern incinerator emissions are not harmful
How are emissions targets controlled if you don't know what is going into the waste stream now or in the future?	We have a pretty good understanding of what will go into the waste stream. Exhaust will be constantly monitored.
Projected volume of lorries and their impact. Potential for rail deliveries of waste.	Meeting 2, 6 October 2009, presentation.
Why this site was chosen. Will the plant expand if successful? The relationship between this site and BeaR (Bedfordshire Energy and Recycling Project). Will approval of this scheme result in further waste processing development in the area?	Meeting 2, 6 October 2009, presentation and meeting 8, 15 March 2010.
Is EFW an efficient way of producing energy? Will there be any benefit to the local community in hosting this plant?	Meeting 4, 16 November 2009, presentation.

Meeting 2

6.5.10. 6 October 2009, 12 members attended.

6.5.11. The main topics of discussion were: waste sourcing and volume; traffic impacts, both as requested by the CLP at the previous meeting.

- 6.5.12. 4 supporting documents were provided by Covanta: Traffic Scheme Plan; Vehicle Movements; Waste Policy-Regional Waste Management; Waste Sources.
- 6.5.13. Presentations were given on waste sourcing and volume; and on traffic impacts. The presentations addressed some of the points raised by the CLP members at the previous meeting, specifically: that recycling and composting would already have removed a significant proportion of the waste before it arrives at the RRF; that Covanta does not plan to extend the RRF; that 356 2-way HGV movements and 174 2-way car movements per day were preliminary forecasts in relation to the operational phase of the Project; options to use rail transport were still being assessed although it had been established that rail access could not be provided to Rookery South pit itself .

Outcomes of the meeting

Key CLP feedback.	Covanta's response or number and date of meeting at which it was addressed, and how, by Covanta.
Wished to see images showing the visual impact of the building in a view of the vale.	Meeting 3, 20 October 2009, presentation.
Why is the building so big?	This relates partly to capacity (discussed at this meeting) and also process design and arrangement of equipment in the plant, to be discussed at meeting 4, 16 November 2009 and meeting 9, 26 April 2010, presentations.
What other sites had been considered?	Meeting 8, 15 March 2010.
CLP very keen to see rail deliveries to the plant.	Will inform CLP of further progress on rail options.
Feel that traffic associated with the Project will cause congestion. Requested a layman's interpretation of the Traffic Impacts model.	Will seek to facilitate upgrade of Green Lane level crossing to address potential safety concerns. Layman's interpretation Meeting 5, 14 December 2009.

Meeting 3

- 6.5.14. 20 October 2009, 10 members attended.
- 6.5.15. The main topics of discussion were: design of the building and landscaping, lowering the building, integration of the building into the landscape using bunding and planting.
- 6.5.16. 2 supporting documents were provided by Covanta: Design Update booklet including initial photomontages from locations agreed with statutory consultees and Revised Terms of Reference.
- 6.5.17. A presentation was given about the then current design proposals. This covered how the building form had been developed, the number of stacks, a comparison between 1, 2, and 3 stream plants in terms of scale and operation, material and colour study, options for green/brown roofs, potential for lowering the building and bunding and landscaping. The presentation explained that the designers had reduced the height and visual impact of the building and stack as far as possible through building design and working with the operational design engineers to compress the internal organisation of the building. The work already undertaken and presented in meeting 2 had already achieved a reduction in the stack height of 10m (from 115m to 105m) and the building by 4m through consideration of basic building form. Covanta confirmed that the building could not be lowered any further into the ground than the proposed final level of the pit following the Low Level Restoration scheme. This is because environmental projections suggest that the local water table will rise and this would increase the risk of flooding the building. The issues had been explored by Covanta's operational team who had commissioned additional technical work to explore the matter. This would be reported in the Design and Access Statement to be submitted with the Application. An explanation was given of the screening effect of planting on bunding over time, the perimeter planting strategy on the edge of the pit and the methodology for photomontages for clarity.
- 6.5.18. A comparison with Cardington Hangars was provided.

Outcomes of the meeting

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
Requested that photographs for the photomontages be taken on a clearer day than examples shown. Requested context views of the plant plus Nirah and Cardington Hangars. Asked about visibility of plume.	Will make requested images available, including with a plume: see meeting 5, 14 December 2009.
Asked about anticipated level of light pollution, and whether light aircraft from Cranfield would be endangered by the stack.	Lighting of pit floor will only be on during working hours, safety lighting will be minimal, two red lights at top of stack required by Cranfield Airfield for safety.
Asked about size of proposed trees at time of planting.	Plants would be saplings plus some more mature trees.
Asked about carbon reducer credentials of the EfW Facility.	Meeting 4, 16 November 2009, presentation.
Allegations arising from a trade union dispute and breaches of environmental controls relating to Covanta's US operation were raised.	Meeting 4, 16 November 2009, issue of note and discussion.

Meeting 4

- 6.5.19. 16 November 2009, 11 members attended.
- 6.5.20. The main topics of discussion were: US Union and environmental breach allegations, the EfW process and the size of the building, carbon credentials of the RRF, the application process.
- 6.5.21. 6 supporting documents were provided by Covanta: Reason for Building Size, EfW Process Description, Summary of Opportunities for Public Involvement in the Planning Process, EfW Energy Efficiency, Co2 Emissions from the Proposed EfW Facility; and "Note on Environmental Compliance".
- 6.5.22. A presentation was given by Covanta covering the topics above. The Union allegations were discussed with reference to the document, "Note on Environmental Compliance", describing Covanta's environmental track record. The new IPC planning process was described and Covanta confirmed it would

be applying via this route. Covanta described the IPC consultation requirements that apply to development consent applications. CLP members suggested ideas for improving the consultation process. Covanta explained that a larger, more centralised plant is more economically and environmentally efficient than smaller, more local ones when issues such as energy efficiency and transportation have been included in the calculations.

Outcomes of the meeting

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
Does metal extraction during the process affect the temperature required?	Not significantly because the amount of metal is very small.
Is it still part of the plan to take heat out into the local area?	Covanta do not have a contract to provide CHP but the Project includes allowance for CHP provision.
Why does this plant have to go to the government for planning permission?	Because it will produce more than 50MW of electricity.
What happens to hazardous waste from the process?	This is the flue gas residue, which contains lime. It will be transported from the site in sealed containers to a hazardous waste landfill site.
What happens to the bags used to collect and contain the hazardous fly ash from the EfW process?	They are re-used for up to 3 years. Will provide information about how they are disposed of. At meeting 6, 25 January 2010 Covanta confirmed that these would be sent to a hazardous waste landfill facility for disposal.
Will the plume be very large like that from continental plants?	It will be visible sometimes but smaller due to employment of different technology. Also discussed at meeting 6, 25 January 2010
Is the IPC route possible, as it is still being formed, and may be changed if a different government is elected.	Covanta feels this is the best route and if the IPC cannot determine the application, it will go to the Secretary of State.

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
How do local points of view get registered/ advised to IPC?	The Consultation Report will record all feedback and Covanta's response to that. Organisations and individuals can make representations to the IPC once the application is submitted.
How will the CLP know what planning policies apply when making representations to the IPC?	Meeting 6, 25 January 2010, presentation.
What is the consultation strategy and timescale?	Meeting 5, 14 December 2009, presentation.
Have wider impacts such as the embodied carbon in the building itself and carbon produced in transporting waste to the site been included in these figures?	Covanta's calculations show that a larger, centralised plant is more efficient than smaller, more localised ones.

Meeting 5

- 6.5.23. 14 December 2009, 8 members attended.
- 6.5.24. The main topics of discussion were: the layman's interpretation of the traffic model requested in meeting 2 and consultation strategy details.
- 6.5.25. 4 supporting documents were provided by Covanta: Engagement Consultation Overview Work Plan, Transport Forecast, Transport Presentation, Planning Policy.
- 6.5.26. Covanta presented photomontages as requested at meeting 3. A presentation was given to describe the traffic assessment in layman's terms. Trip numbers, control of vehicle movements and hours of deliveries were discussed. The CLP also asked about the definition of a "sensitive receptor", and suggested that they would be well-placed to suggest additional such receptors. Control of construction phase traffic was also discussed.

Outcomes of the meeting

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
Requested additional photomontage from Houghton House.	Will be included in assessment.
Requested list of viewpoints agreed to date with other consultees and opportunity to add more.	Issued to members outside the meeting (see Appendix 20).
Please reconsider sensitive receptors to traffic impact across a greater area.	Will reconsider.
Can a site visit be arranged?	Took place on 28 February 2010.
Please confirm if balloons can be used to indicate stack and building heights.	Meeting 6, 25 January 2010, discussion.
The CLP asked for more information about CHP delivery.	Will provide information. See meeting 8, 15 March presentation.
From how many villages would refuse collection vehicles be travelling, via Stewartby to Rookery South?	This is currently unknown. The local authority is responsible for this.
Are the Bedfordshire or Luton local authorities in contract negotiations with Covanta?	No, although Covanta has expressed interest in bidding.
What has driven the wide range of hours now proposed?	Operational requirements, flexibility where possible and environmental constraints.
How many vehicle movements will there be on Saturdays?	Generally fewer than on Mondays to Fridays.
What has happened to suggested use of railway?	Rail option still under review but current advice suggests this is not feasible due to site constraints and other issues The introduction of a rail link in the future has not been ruled out.
The Renewable Energy Strategy requires multi modal transport and promotes use of rail- why not choose a site where rail can be delivered? How will the IPC consider this point?	Covanta need to demonstrate that the site is appropriate in many respects. The PER will consider rail options to date, this has not been shelved.

Meeting 6

- 6.5.27. 25 January 2010, 10 members attended.
- 6.5.28. The main topics of discussion were: planning policies against which the application will be determined, an update on the Public Consultation Strategy, plume visibility.
- 6.5.29. 3 supporting documents were provided: Plume Visibility, Planning Policy Context, Catchment Area.
- 6.5.30. A presentation was given by Covanta describing the Planning Policy context for the Project. Relevant policy documents were identified and key policies described. Impacts from the development, site choice and consultation were also referred to. Covanta reported that the draft Statement of Community Consultation (SOCC) and strategy have been passed on to CBC and BBC and that they had returned comments. Public exhibition dates and venues in March 2010 were given. Covanta advised that it would be possible to use two balloons on site: one to mark the building height and one to mark the stack height. The Preliminary Environmental Report (PER) had been delayed due to the need to continue design iterations including considering feedback from CABA and the need to further discuss the proposal with EH. A Plume Visibility presentation was given.

Outcomes of the meeting

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
Where will waste for the EfW plant come from and how does this comply with policy? CLP stated that their respective organisations felt strongly that this large EfW facility was inappropriate, particularly if it was not to receive Bedfordshire municipal waste.	Waste will come from outside Bedfordshire. It is Covanta's view that national and regional policy provides for this.
Requested an explanation of choice of this site.	Covanta has completed an audit of several hundred potential alternative sites and was preparing a report demonstrating why Rookery South is the preferred site. This was further discussed at meeting 8, 15 March 2010, presentation.
Asked what policies related to protecting the landscape and CLP requested to consider policies and consider further questions.	NPSs 7 and 15, the Marston Vale Forest Plan and other Local Plan policies. Meeting 8, 15 March 2010. The PER also provided more detail.
Felt that public exhibitions should also be held in Ampthill and Millbrook.	Will include these venues.
Would like to comment on Covanta's draft exhibition Feedback. Questionnaire.	Will circulate by email for comments. Will also circulate final SOCC.

Meeting 7

- 6.5.31. 22 February 2010, 12 members attended.
- 6.5.32. The main topics of discussion were: outstanding design /photomontage requests and traffic issues update.
- 6.5.33. 1 supporting document was provided by Covanta: transport presentation.
- 6.5.34. A presentation was given by Covanta's design consultant, showing how the building design had evolved following comments from CABA and EH, and a number of photomontages of the building in the landscape. A presentation reviewed transport aspects of the project.

Outcomes of the meeting

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
Requested additional viewpoints, including possible night time views. How have the views been chosen? Has reorientation of the building been considered to reduce visual impact from Ampthill Park House? The view from Ampthill Park is the most intrusive. Have the managers there been consulted and can the CLP speak to them independently?	Viewpoints added. Views were chosen with English Heritage and Local Authority officers, also explained at meeting 9, 26 April 2010. Building orientation has been carefully considered to offer the optimum minimisation of visual impact overall. Ampthill Park has also been carefully considered in the assessment. The managers have been consulted and Covanta provided contact details for them.
Can Covanta confirm traffic volume presented i.e. 180 vehicle movements per day?	Yes. This covers two way journeys, meaning 360 HGV journeys per day and excludes staff journeys.
When will the 12 bulk loaders based at the site be on the road?	They will leave between 5.00 and 7.00 am and return during the day.
Remain concerned about operating hours and HGV movements to 11pm and asked about how this can be controlled by planning condition.	Explained delivery hours. Will check how planning conditions and any changes to these are considered by IPC. This information was circulated after meeting 8, 15 March.
Requested vehicle delivery hours of an existing EfW.	Will provide information about vehicle delivery hours at a similar EfW facility.
Requested more detail about the forecast additional 4% increase in traffic flows on the A421 towards Marston Moretaine and level of HGVs in the HA model.	Answered by email following meeting 8, 15 March.
Asked about a major traffic incident scenario on Green Lane.	Have to put a contingency plan to the local authority in case of this scenario. Waste would be held at transfer stations for longer.
Does the PER include use of rail?	Rail use is considered in the PER but its provision will not be proposed in the application. Rail Report will accompany the DCO submission.

Site Visit

- 6.5.35. 28 February 2010, 11 members of the CLP, representatives of Covanta and relevant members of their team attended the site visit.
- 6.5.36. The visit included walking along the proposed site access road to the edge of Rookery South pit, viewing the position and orientation of the proposed building (shown by ground markers), description of where the balloons would be during the public exhibitions to be held in March, an overview of the proposed Low Level Restoration Scheme works, consideration of views from the Greensand Ridge and the Forest Centre, an overview of the Green Lane junction and HGV routing.

Outcomes of the site visit

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
Had Covanta considered locating the RRF on the eastern edge of Rookery South Pit to lessen visual impact?	Information to be provided in the Design and Access Statement accompanying the DCO submission.
Could Covanta offer a larger Community Trust Fund?	Current offer of £150,000 in first year and £50,000 in following years is same as for other Covanta UK projects but is subject to consultation.
What are the community benefits of the Project?	Community benefits are subject to consultation and information will be available at public exhibitions. See also 9, 26 April.
What would be the visual impact of Combined Heat and Power (CHP) on the Marston Vale? Would the pipework be visible?	Meeting 8, 15 March 2010, presentation given.

- 6.5.37. CLP members raised two other points after the site visit: why does the chimney have to be so high if it is not emitting anything dangerous? How much oil is used per annum to fire the plant? These queries were answered by email, circulated after meeting 8, 15 March (see Appendix 19). The chimney height query was also addressed at the meeting 9, 26 April.

Meeting 8

- 6.5.38. 15 March 2010, 11 members attended.
- 6.5.39. The main topics of discussion were: planning policies relating to landscape for this application, Combined Heat and Power, site choice and alternatives.
- 6.5.40. 6 supporting documents were provided: A421 Traffic Flows; ASAR (Alternative Site Assessment Report) Methodology; CHP Presentation; Procedure for Varying Development Consent Orders; Response to Traffic Flow Query; Short Listed Sites Overview
- 6.5.41. A presentation was given about relevant planning policies, a CHP presentation was made, a site selection presentation was made.

Outcomes of the meeting

Key CLP feedback.	Covanta's response
Concerned about the quality of information being issued to them, for example the viewpoints presented at previous meetings.	Suggested, and CLP agreed, that CLP will continue to question Covanta about the information they provide to ensure they are satisfied with the answers they receive.
Concerned that the IPC will not get an accurate overall view of the impact of the proposed scheme.	Overall planning case, including landscape issues, will be presented to the CLP once the application has been submitted to the IPC.
Can the CLP see comments from statutory consultees?	They will be on the IPC website in response to the submitted DCO application. Covanta will seek to provide the draft section 37 Consultation Report prior to submission.
Will CHP hot water pipes be visible? Can existing houses benefit? Will there be any grants available and how expensive will the heat be? What development has been included in Covanta's business case for CHP?	CHP pipes will not be visible. Grants will be available and the heat will be about 10% cheaper than other sources. The four planned developments are included in the business case.
Members requested that it is made clear in the Consultation Report (this report) that membership of the CLP does not imply that members agree with the proposed development.	Will make it clear in the report that membership of the CLP does not imply support for the proposed development.

- 6.5.42. Covanta also supplied information to CLP members after the meeting, answering queries raised: annual oil consumption of the RRF; IPC process for changing working hours post application; and confirmation of HGV numbers in the HA model.

Meeting 9

- 6.5.43. 26 April 2010, 11 members attended.
- 6.5.44. The main topics of discussion were: selection of viewpoints for the photomontages; an update on community benefits; EA presentation on their role and the Environmental Permitting process; RRF plant height relative to other UK facilities.
- 6.5.45. 6 supporting documents were provided by Covanta: EA Scoping Opinion to Covanta; EfW Facility Policies; Fichtner Slide Show; Outstanding Issues; Submission Documents V3; and the EA.
- 6.5.46. A presentation was given by LDA Design describing the stages for selection and agreement of others (eg. EH, local authority) to the chosen views of the proposed RRF; Covanta outlined its community benefits proposals and stated that feedback from recent exhibitions was being analysed to assess how these proposals had been received by the public and any required changes would be identified; a presentation was given by the EA on their role and the Environmental Permitting process; a presentation was given describing the height of the EfW Facility in relation to other similar UK facilities. Covanta gave initial feedback from the recent public exhibitions and informed the CLP of the postponement of the application date for development consent. Covanta circulated a list of the documents required for the application to the IPC.

Outcomes of the meeting

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
Will Covanta compensate homeowners for 'planning blight' resulting from the Project?	Will not be offering compensation for generalised 'planning blight'.

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
Does the IPC judge whether or not proposed community benefit is fair compensation for hosting the plant?	The IPC will take community benefits offered by Covanta into account when determining the application. Environmental impact and need for the Project are primary considerations.
How can the local community ensure that the economies of scale achieved by the larger plant are reflected in lower local taxes?	Presentation given at meeting 12, 19 July 2010.
Are the relevant draft NPSs approved yet, and if not, will the IPC use existing regional waste policies to determine the application?	The relevant NPS are still drafts and regional and local policies will also be taken into account by the IPC.[Note: regional policies are now revoked].
Is the gate fee directly proportional to capacity?	Larger plants are more cost-efficient than small ones, although other factors can affect the gate fee.
Can energy generation rates be improved?	Energy generation rates depend mainly on the quality of the waste fed into the process and this can vary greatly between authorities.
Can the CLP see EA's input to the consultation process?	The EA scoping opinion (provided) is the EA's formal input to the consultation process.
How long does the EA permit last?	The EA permit lasts for the lifetime of the site. However, the EA continuously monitors sites and reviews criteria for operation every 6-8 years.
If the EA support the Project through the planning process, is the permit automatically provided?	Permits are not automatically provided if the EA is positive at planning stage; the two processes are separate and Covanta has to convince the EA that operations methods will meet EA requirements.
What are the measures of air quality used?	The EA requires operators to use approved dispersion models and sets maximum allowable limits.

6.5.47. Covanta also offered to provide the full set of views and photomontages to be used in the application to CLP members on disc, and a copy of a letter from EH agreeing the photomontage locations with Covanta. This was done at meeting 10, 24 May.

6.5.48. It was agreed at this meeting that the EA representative would attend further CLP meetings as an independent observer and input on relevant matters

Meeting 10

6.5.49. 24 May 2010, 12 members attended

6.5.50. The main topics of discussion were: noise impact; air quality impact; and health impact assessment (HIA).

6.5.51. 4 supporting documents were provided: HIA; Noise Presentation; Vehicle Movements A421; Air Quality and Health

6.5.52. A presentation was given about noise impact, a presentation was made by ERM about air quality impacts and the proposed HIA.

Outcomes of the meeting

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
Won't the piling be noisier than suggested by the presentation?	The proposed method of piling is quieter than others.
Has wind direction been accounted for in the model?	Yes, wind direction has been accounted for.
Are projected traffic noise levels averages or maxima? Is the new road taken into account in the model?	Traffic noise levels presented are averages, and the new road is taken into account. Will provide maximum traffic noise figures and de-trunked A421 traffic forecast (former discussed at meeting 11, 21 June, latter circulated at meeting 11).
The projected noise from the EfW plant during operation seems low.	Most plant is inside the building and doors will be kept closed where possible. Externally, quiet fans have been chosen. All these factors will help reduce noise levels.
Could Covanta change operating hours to avoid 5.00	Covanta needs to retain operating hours as proposed to enable flexibility; however, very few

Key CLP feedback.	Covanta's response or number and date of meeting at which feedback was addressed, and how.
am to 6.00am to reduce loss of local amenity?	lorry movements are planned during the early period.
Could Covanta provide noise data from equivalent plants in the UK?	No data from comparable plants is available but Covanta will pursue this.
Why does the air quality model assume ingestion rather than inhalation of dioxins?	For humans, ingestion is the more significant pathway than inhalation.
Do the figures take account of vulnerable groups?	Yes, for example: pregnant women, children, asthma sufferers.
How can we be confident of monitoring? Is the definition of safe emission the same as it has always been, or has it changed?	The EA monitors UK emissions rigorously. Covanta will be required to report on emissions every ½ hour, and an average for every 24 hours. The public will have access to the results. Safe emissions limits have become more stringent and are now lower than in the past.
Are there other waste disposal methods that would not produce these levels of emissions (e.g. anaerobic digestion)?	All methods of waste treatment or disposal produce emissions of some sort.
Would a smaller plant produce emissions at a lower rate?	Yes, but the stack proposed here is taller, thereby reducing the concentration of pollutants at breathing level.
Are emissions monitored to check for spikes, e.g. if radioactive waste entered the system?	Yes. In the event of a significant problem the facility would be temporarily shut down. Covanta will comment on the report of radioactive material entering landfill and how it would prevent dangerous material getting into the EfW Facility. Presentation given at meeting 12, 19 July 2010.
Can CLP members invite others to HIA workshops? Have GPs been invited?	Yes, dates are 5 and 8 June 2010. GPs are invited but are usually too busy to attend. Approaches will be made to interview them one to one.
How will the output/conclusions from the workshops be captured and quantified?	A report will be prepared recording: all comments made; high priority issues; ideas for reducing impacts; and maximising benefits (e.g. employment opportunities).

Meeting 11

- 6.5.53. 21 June 2010, 7 members attended.
- 6.5.54. The main topics of discussion were: Local Impact Report (LIR); bottom ash handling and recycling issues; noise impact; and monitoring air emissions.
- 6.5.55. 4 supporting documents were provided: LIR process presentation; bottom ash handling and recycling presentation; noise issues presentation; monitoring of air emissions presentation.
- 6.5.56. Presentations were given: by CBC about the LIR; by Ballast Phoenix (which is the contractor for bottom ash processing at the site for the plant's lifetime); by Covanta's noise consultant about noise; and by Fichtner about monitoring of air emissions.

Outcomes of the meeting

Key CLP feedback.	CBC's response.
How and by when can the CLP provide input to the LIR? Who else is being invited to provide input?	Telephone number provided and input required now. Covanta are to provide list of their consultees.
Can the LIR consider wider impact of the Project and development of entire Rookery South Pit site?	Yes. Council planners will provide this.
How will the Bedfordshire and Luton Waste Policy feed into the LIR?	As the policy is not yet formally adopted it will not carry much weight, but the issue will be included in the LIR and the CBC committee report on the application to the IPC.
How can paper survive the incineration process?	Happens when paper is dense e.g. phone books. Covanta to explain how much waste will not be fully incinerated.
Will bottom ash be stockpiled?	Yes, on site for up to 6 months.
What are the noise impacts of the process?	Noisy processes take place inside the building.
Will the bottom ash be dusty?	No, it is soggy at first then forms a crust as it dries.
Leachate is tested for pollutants: what happens when you find pollutants?	This would be raised by Ballast Phoenix with Covanta, with which daily liaison would occur.

Key CLP feedback.	CBC's response.
Where will IBAA (Incinerator Bottom Ash Aggregate) go to and what will the traffic effects be?	This will go to construction projects, using on average 100 trips per week.
How will iron waste be dealt with?	This is collected, separated and then recycled off site.
Will concrete blocks be manufactured on site from the IBAA? We have read of such blocks that exploded.	No.
One member wanted to prepare some more questions for the IBAA contractor.	Independent facilitator will forward questions to the contractor.
Requested simple explanation of why additional noise will not have a high impact. Asked to talk to someone who has experienced similar change in noise environment.	Sometimes local people will be able to hear operational noise, but it will not be obvious as to the source and it will be constant, and therefore less noticeable. HGV traffic noise will be more noticeable. Will prepare simpler explanation of how noise impacts are calculated and identify a community or study for CLP reference.
Are the "nastiest" emissions being monitored only every 3 months due to cost?	These emissions are usually constant. Will probably be required by the EA to review use of continuous monitoring techniques, which are currently being developed.
Could continuous monitoring be part of the Visitor Centre activity?	Will consider and respond.
Could EA require more testing initially to establish community confidence?	EA carry out more checks where greater levels of perceived risk and concern exist.
Prevailing winds suggest that pollutant levels will be higher in Stewartby than the Forest Centre, therefore monitoring should occur at the former.	Will consider re-siting diffusion tube to north east direction. Further discussed at meeting 12, 19 July 2010.
How much higher are Mercury levels than is normal for a rural area?	2-3 times higher, probably because of the industrial history of the area.

Meeting 12

- 6.5.57. 19 July 2010, 10 members attended
- 6.5.58. The main topics of discussion were: responses from Covanta on issues raised by CLP members: financial savings flow through to local authorities; monitoring of content of waste coming into the RRF; responses to Cardiff and Middlewich Incinerator planning refusal; detail of HIA consultees; and effectiveness of incinerator.
- 6.5.59. 3 supporting documents were provided: note on continuous monitoring; clarification from Environment Agency; Middlewich planning refusal.
- 6.5.60. The meeting opened by addressing issues raised at the previous meeting by the CLP. Covanta suggested that members should speak to the Merthyr Tydfil CLP, which visited Covanta facilities in the US, in order to understand likely impacts (including noise) from comparable facilities. Covanta also suggested a visit to the Lakeside facility in the UK, run by a competitor, to help understand associated noise and other impacts. Covanta identified two sites which provide continuous monitoring of emissions data, which would give air quality data for a comparable facility. A presentation was given describing how financial savings flow through to local authorities. A presentation on monitoring of content of waste coming into the RRF and effectiveness of the incinerator (percentage of organic material in bottom ash) was also given. Covanta's Middlewich Energy from Waste Facility planning application refusal was discussed as were the implications of an approval of an EfW plant in Cardiff. The HIA process was discussed:

Outcomes of the meeting

CLP question from previous meeting	Covanta's response.
Please provide noise data for a comparable facility.	Suggest CLP meets Merthyr Tydfil CLP. Covanta will arrange for contact.
Would like to visit comparable site in the UK.	Suggest Lakeside facility. Will arrange for September 2010 if acceptable to operator.
Please provide air quality data for	Provided website addresses for sources

CLP question from previous meeting	Covanta's response.
a comparable facility.	of information.
Would Covanta consider putting continuous monitoring into place as part of its Visitor Centre activity?	Would make available monitoring information in the Visitor Centre.
Please review siting of the continuous monitor to the north east direction.	There is a monitor in Stewartby and Covanta will identify the owner and advise if this data is publicly available.
A CLP member had heard that the application would be determined locally. When will the application be made and to whom?	It will be submitted week commencing 26 July 2010 to the IPC and will be determined by Government.
Is it true that no local authorities want to talk to Covanta about waste solutions?	No. Covanta is at the advanced stages of contract bids with a number of authorities.
What is the status of the Buckinghamshire County Council waste bid given that there are restrictive covenants on the development of The Rookery South site?	The covenants can be compulsorily acquired under the IPC process and this is Covanta's intention.
How does the Covanta facility deal with asbestos, mercury, cadmium and radioactive material?	Small amounts of asbestos would not burn and would be removed in the bottom ash; large amounts would be turned away. Mercury and Cadmium vapours would be removed by the gas cleaning system. Covanta would not have a contract with a radioactive waste producer. Covanta would consider putting a radiation detector on the facility. The independent observer from the EA agreed to note this as a specific concern in the permit consultation.

CLP question from previous meeting	Covanta's response.
Middlewich Incinerator planning refusal: this application was handled by locally elected representatives, surely it is not right that The Rookery South application should be decided by a quango.	The Rookery South application would have gone to the Secretary of State in the past. The local authority was still a key consultee in the process. The LIR is taken account of.
Was Covanta also planning another facility within 4km of the Middlewich site?	No.
CLP members who attended the HIA workshops felt that there had been a prepared list of issues that the session was designed to produce, that the facilitator had led the discussion to those issues and any ideas outside that list were not recorded.	This is concerning. Will review the process with the HIA consultant. Will provide details of consultees and others who participated.
Is it true that people who responded to press coverage about the HIA workshops were refused entry to the workshops?	Will investigate and respond, but didn't believe this to be the case.

- 6.5.61. The date of the next meeting has not been set. The frequency and nature of CLP meetings will be reviewed following the IPC submission, and Covanta is supportive of the CLP process continuing.

6.6. Outcomes of CLP consultation

- 6.6.1. It is intended that the information provided by Covanta to the CLP will have been disseminated to the wider population by panel members (whether formally or informally), although public exhibitions and other measures have also been held to achieve this. Many of the issues raised by the CLP have been raised by other consultees (e.g. size of the building, visual impact, and traffic impact) and have been considered by Covanta. These have led to direct examination or re-examination of matters of design and assessment of effects.
- 6.6.2. The effects on the Project of the CLP consultations are summarised below by theme.

Design

- 6.6.3. At the first meeting the CLP raised concern about the visual impact of the building. The size and design of the building have been significantly revised during the pre-application consultation period as a result of feedback from several sources, including the CLP, to reduce visual impact. The CLP was kept informed about design development through a series of presentations (on 22 September 2009, 20 October, 16 November and 22 February 2010).

The Environment

Landscape

- 6.6.4. The CLP expressed concern about the scale of the Project and the effect this would have on views in the area. On 20 October a presentation described how planting and bunding around the perimeter of the building would help to integrate it into the landscape. Photomontages were prepared, photographs reshot as requested and from viewpoints including one requested by the CLP. A site visit for the CLP was arranged (26 February 2010) on request. The use of balloons to locate the building in views was suggested by the CLP and implemented. Bunding and tree planting has been added to assimilate the building into the landscape. Plume visibility was addressed on 25 January by presentation following queries raised on 16 November.

Cultural Heritage

- 6.6.5. The CLP expressed concern about views from Houghton House. Views from here were a driver for refinement of the Project design.

Noise

- 6.6.6. This was also raised at the first meeting. Covanta's noise consultant has presented to the CLP (24 May and 21 June 2010), describing the potential noise impact of the Project. At the 19 July meeting, Covanta suggested a comparable site to visit and offered to arrange a visit. The CLP were also offered the opportunity to speak to Merthyr Tydfil CLP members who have visited Covanta facilities in the US.

Traffic

- 6.6.7. This was raised at the first meeting as being a major concern. The CLP was keen to understand the projected impacts and has received presentations (on

6 October, 14 December 2009 and 22 February 2010) and documentation relating to traffic from Covanta's traffic consultant.

Public Health

- 6.6.8. The CLP raised questions early on (20 October 2009) about Covanta's environmental compliance record in the US. At the next meeting these allegations were addressed and information given on Covanta's record. On 26 April the EA described how monitoring of the plant would be independently carried out. The CLP have been presented with information about air quality and the HIA (on 24 May 2010). Members were invited to suggest who should be invited to the HIA stakeholder events and to comment on the HIA process. Another presentation on emissions monitoring was made on 21 June.

Amenity and Recreation

- 6.6.9. The Project and associated works include improved local rights of way and significant new planting on and off site. These have been described to, and discussed with, the CLP. The CLP were keen that the Marston Vale Trust should benefit from available funds in order to improve amenity and recreation opportunities locally.

Sustainability and Climate Change

- 6.6.10. Following queries raised on 20 October 2009, the 16 November meeting included a presentation covering the carbon credentials of the RRF. Anticipated annual oil consumption of the RRF was provided at the 15 March 2010 meeting following a request.

Planning

- 6.6.11. Questions were raised about waste sourcing and volume at the first meeting. The CLP were presented with detailed information on this subject at the meetings on 6 October 2009 and 25 January 2010. The planning application process was described at the 16 November meeting. Planning policy context was explained at the 25 January 2010 meeting and planning policies relating to landscape were discussed on 15 March 2010. On 26 April, Covanta shared the IPC scoping opinion on the EIA with the CLP and listed the documents that would constitute the application. A CBC planning officer gave a presentation to

the CLP on 21 June to describe the LIR, which was being prepared by the council and requested input from the members.

Is There an Alternative?

6.6.12. Alternative sites were discussed at the 15 March 2010 meeting.

6.7. Conclusion

6.7.1. The independent facilitator has produced a review of the CLP process to date (see Appendix 21). She considered how the CLP had performed against each of the original objectives. Her conclusions (as quoted from her review, Appendix 21) are set out below the relevant objectives:

To identify issues of local concern; to provide a channel so those issues can be articulated; to help inform and educate local opinion-formers; to provide a structured arena for constructive debate; to update the local community on the progress of the development.

The CLP has delivered opportunities for the CLP members to raise the key issues for the communities they represent and enabled a wide ranging debate about the proposal. The meetings have run over time to ensure that their views are fully captured and all members have been able to participate.

The eleven meetings have discussed a range of issues with all of the following topics covered at least once in the ten months the CLP has been operating:

Building Design and Landscaping

Potential to reduce building size

Noise impact assessment

EfW processes, power production, dimensions

Traffic impact assessment

Carbon credentials of EfW

Air Quality impact assessment

Plume visibility

Waste Sourcing and volume

Community benefits consultation

Plans for Combined Heat and Power s

Bottom Ash processing

Planning application process and Infrastructure Planning Commission (IPC) process

Key policies against which the application will be determined

Public Consultation strategy

Content of the Preliminary Environmental Report

Each presentation has been followed by questions so that CLP members can express key concerns and ask about related topics.

The initial set of issues for presentation was gathered from each CLP member when I recruited them, so from the start the agenda has been agreed by the CLP itself.

At each meeting there is an agenda item for any other business that CLP members wish to raise, and the CLP agrees items for the next agenda at the end of each meeting. Sometimes these are suggested by Covanta as its development work reaches key milestones, or they arise from the questions in the meeting, or from queries raised outside the meeting.

None of the meetings have been less than two hours, and CLP members provide feedback after the meeting if they have further questions. CLP members have recently fed back that the meetings could be improved by allowing time for reflection between sessions and then further debate of issues at the next meeting, and this is an area that I will address from now on.

To better understand and respond to local concerns.

Covanta has presented on all issues that have been raised. It has taken action on some aspects where the CLP raised significant concerns, for example conducting further work on reducing the size of the building and stack, and taking additional viewpoints and sensitive receptors for design and noise studies. Where Covanta has been unable to action some of the requests of the CLP in relation to, for example, reducing HGV delivery hours or reducing the throughput of the Project, Covanta has explained the reasons why. In these instances the conclusion has been that the CLP “agrees to disagree” about the impacts on the local community.

An opinion has been expressed at the CLP meetings that Covanta is making a proposal that is unacceptable to the community and therefore does not understand the view that the Project should be located somewhere else. Covanta has made the point that, while it fully understands this view, it intends to make its case based on the benefits of The Rookery South site, and is making every effort to minimise the impacts on the local community as well as to deliver some local community benefits.

The CLP members are equivocal about the quality and relevance of information provided by Covanta - there is a widely held view that information has sometimes been too technical and needs to be presented in a way that is meaningful for them. Additionally they are not yet satisfied that predictions which suggest that noise, traffic and pollution impacts will be insignificant are correct. They would like testimony from people living near similar facilities and real data from similar projects to be convinced. In light of this feedback Covanta is presently investigating ways in which such testimony can be shared with the CLP.

However CLP members say that they have been given enough information to understand the range of impacts of the project, and feel better prepared to comment on the proposals once they are submitted to the IPC.

My experience is that Covanta have answered concerns as far as they have been able to at each point in the development of the proposal, and been very open about their proposals. Most of the presenters have been specialist consultants who are advising Covanta and have to provide advice based on industry standards and accepted research, the remainder have been Covanta

specialists who have provided information requested and answered all questions in detail.

I will continue to encourage CLP members to raise issues and ensure that responses to these are provided in a direct way that the panel can understand – it is then down to the CLP members to continue to question until they have the information they want.

To hear how best to communicate with the local community

Covanta has shared its Community Communication Strategy with the CLP. CLP Members have commented that they do not feel that the local community has been given the opportunity to say whether they do or do not support the Project. Covanta has committed to provide full and completed information on the detailed proposals at the time of the application submission to the IPC so that CLP members' organisations can make appropriate representations.

To resolve any questions that may result from the construction and operation of the proposed Rookery South RRF.

At this stage of the application process it is not appropriate to comment on whether the CLP will continue with the same membership should the application be successful. Some members may feel they do not want to continue in this circumstance. Should that be the case I would ask for further volunteers and select replacement members to continue representation from a good cross section of the local community.

- 6.7.2. Covanta considers that communications with the CLP have been highly valuable for identifying and addressing, so far as appropriate and applicable, the key areas of concern to the local community. In this respect, the CLP process has been significant in complying with the principles of the CLG guidance, which stresses that pre-application consultation should help local people understand what a project means for them and enable early resolution of misunderstandings.

7.0 Winter 2009/10 Consultation

7.1. Introduction

7.1.1. This period covers December 2009, January and February 2010, an intensive period of consultation including: consultation in respect of the proposed Statement of Community Consultation (SOCC); IPC Environmental Scoping; Landowner Consultation; continued Technical and Statutory Consultation; and publication of the SOCC itself. Publication of the Preliminary Environmental Report (PER) also occurred in February 2010, but this is discussed in section 8 below as most of the feedback to the PER was received during that period. The Information Line and Web Enquiries facility was launched in January 2010, but as this was a key conduit for feedback to the PER, this is also discussed in Chapter 8.

7.1.2. During this period Covanta completed compilation of its PER. This exercise was partly informed by scoping already undertaken and the IPC's initial scoping response (see below). The PER, and consultation on the PER, are key elements of this phase of consultation. They are also statutory requirements.

7.1.3. This period dealt with the consultation pursuant to s42 PA 2008 (see Chapter 8.2). In particular, it dealt with prescribed persons under s42(a), each local authority that is within s43; and landowners and others within categories under s44. It was not necessary to consult the Greater London Authority.

7.1.4. Relevant local authorities for the purpose of s42(b), and all authorities within the waste catchment area were consulted. Together, these comprise:

Milton Keynes Council;
Wellingborough Borough Council;
Huntingdonshire District Council;
East Northamptonshire District Council;
Fenland District Council;
East Cambridgeshire District Council;
Cambridge City Council;
North Hertfordshire District Council
Welwyn Hatfield Borough Council;
Stevenage Borough Council;
East Hertfordshire District Council;

Broxbourne Borough Council;
Watford Borough Council;
Three Rivers District Council;
Wycombe District Council;
Chiltern District Council;
South Bucks District Council;
Slough Borough Council;
Reading Borough Council;
South Northamptonshire Council;
Daventry District Council;
Kettering Borough Council;
Corby Borough Council;
Northamptonshire County Council;
South Cambridge District Council;
Luton Borough Council;
St. Albans City and District Council;
Dacorum Borough Council;
Aylesbury Vale District Council;
Buckinghamshire County Council
Hertfordshire County Council;
East Northamptonshire District Council;
Northampton Borough Council;
South Northamptonshire District Council;
Cambridgeshire County Council;
Peterborough City Council; and
Hertsmere Borough Council.

7.2. Statement of Community Consultation

- 7.2.1. The PA 2008 requires applicants to consult widely and effectively. Whilst the various statutory requirements to consult (particularly under Sections 42 to 45, 47, 48 and 49 PA 2008 as well as subsidiary legislation) need not be carried out simultaneously, Covanta has considered this to be the most coherent way to perform this important task.
- 7.2.2. Key amongst the steps that applicants must fulfil is the preparation of a Statement of Community Consultation (SOCC) pursuant to section 47(1) PA 2008. This statement sets out how an applicant proposes to engage with

people living in the vicinity of a proposed Application Site. It is required to be published in a newspaper circulating in the area of the Application Site and the applicant must consult in accordance with its terms. For EIA projects it should state where preliminary environmental information can be found, hence it included reference to the PER.

- 7.2.3. As this document would be published alongside other consultation exercises, Covanta commenced preparation at the same time as preparing or publishing other consultation documents. Also, because of the requirement under s47(2) to consult local authorities in respect of a prospective SOCC, Covanta shared its draft SOCC (please see Appendix 22), together with relevant information under s47(3), with BBC and CBC. Given the active role of the CLP, Covanta also consulted the CLP on the draft SOCC (Meeting 6). The relevant information is in the form of the PACS, which is to be found at Appendix 2.
- 7.2.4. Two meetings were held to discuss the terms of a draft SOCC with the Councils (with CBC on 17 November 2009, and BBC on 1 December 2009). A draft SOCC was submitted to the Councils accompanied by the PACS as evolved to fulfil s47(3) PA 2008. Covanta asked that the Councils comment upon the draft SOCC within 28 days (in accordance with s47(4) PA 2008). CBC and BBC responded comprehensively (see Appendix 23), suggesting revisions/additions to the draft SOCC.
- 7.2.5. Covanta took these comments into consideration when producing its final SOCC (see below).

	CBC and BBC comment	How Covanta addressed this in its final SOCC
1	Include details of Planning Aid	Included
2	Clarify where waste is to come from and how much	Included
3	Clarify any associated development (e.g. highways)	Included
4	Refine the 5km radius area for direct mail consultation to ensure everyone who may feel strongly about the Project is included	Boundary had already been refined to include whole parishes surrounding the site
5	Suggest the proposed staffed	Included

	CBC and BBC comment	How Covanta addressed this in its final SOCC
	exhibitions and workshops are held at Stewartby, Marston Moretaine and Houghton Conquest	
6	Suggest the proposed permanent exhibition is held at Marston Vale Forest Centre	Included
7	Suggest that an eight week (rather than standard 28 day) consultation period would be more appropriate, given the nature of the Project	A consultation period of over 6 weeks was given in line with objection periods on other statutory application processes.
8	Request that draft documents are submitted to the IPC and local authorities prior to formal submission of application documents and to inform the SOCC	Draft documents e.g. DCO shared.
9	Suggest that preparation of Statements of Common Ground and Local Impact Report be started and referred to in the SOCC	Commenced and reference to this included
10	Include a summary of the role of the IPC	Included, with website address for further details
11	Include a summary of the status of the National Planning Statements	Included, with website address for further details
12	The scale of the proposals should be described in detail	Included
13	Include an indication of the information that will be provided during the consultation process on the scope of mitigation or compensatory measures for natural habitat impact	Gave details of how to obtain or view preliminary environmental information and gave Covanta website address, stating that all draft documents are available there
14	Suggest delay of public consultation to allow for consultation on the draft NPSs to be complete first	Timetable did not allow postponement.

- 7.2.6. The CLP also commented on the draft SOCC prior to its publication and its suggestions of flying balloons to enable people to envisage the size and location of the building; setting up a permanent exhibition and two additional one day exhibitions; and using a computer model at the exhibitions were included.
- 7.2.7. The final SOCC, reproduced over the page, was published in local newspapers: 'Bedfordshire Times and Citizen' on 18 and 25 February 2010 and 'Bedfordshire on Sunday' on 21 and 28 February 2010.
- 7.2.8. In summary, the SOCC described the Project, gave details of how to access the IPC website for information about how the application process works, gave details of how to access the relevant draft planning policies, described how Covanta would consult with the public, businesses and people living near the site, provided contact details for planning aid (which provides free independent, professional advice to individuals and communities about planning matters) and the Covanta website where draft planning application documents were available to view. The SOCC described past consultation relating to the Project (including the CLP) and gave details of the March 2010 public exhibitions. The PER and where to access this was also explained. Responses to the exhibitions, the preliminary environmental information and the Project in general were requested, with a deadline of 5 April (approx 6 weeks from first publication date).

Don't waste this chance!

This Statement of Community Consultation explains how you can comment on proposals for an application for a development consent order to be submitted by Covanta Rookery South Limited (Covanta) to develop and operate an Energy from Waste (EFW) Facility and post-treatment Materials Recovery Facility (MRF) at Rookery South Pit near Stewartby, Bedfordshire (the Project).

The Project also includes a new access and junction upgrade from Green Lane Stewartby, extensive landscaping and ecological habitat creation, improvements to rights of way, an underground electricity grid connection and a visitor centre – see the Covanta website for more details. The provision of a new footbridge over the Marston Vale railway line and improvements to the Green Lane railway level crossing in Stewartby are also being considered.

The Project will:

- Generate 65 MWe of electricity – more than 50% of which would be classified as renewable energy.
- Export enough electricity to power 82,500 homes – enough to meet the needs of Bedford and the Marston Vale.
- Use residual household and business waste (the remainder that cannot sensibly be recycled or composted) as fuel.
- Have a nominal waste annual throughput of 585,000 tonnes.
- Intend to source waste from Bedfordshire and the Luton sub-region and from nearby local authority areas, subject to contract awards.

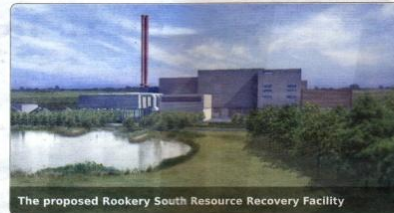
The Project will not accept waste from London.

Subject to discussions, surplus process heat could be used to heat other nearby consented developments such as NIRAH and Center Parcs.

At present, Bedfordshire and the Luton sub-region generate 370,000 tonnes of residual household and business waste. Covanta treats more waste at its EFW Facilities than anyone else worldwide and considers this technology as the most cost-effective, proven and environmentally sound alternative to landfill for such waste.

Covanta carry out full and extensive public consultation in relation to the projects wherever they take place. This application will be made to the new Infrastructure Planning Commission (IPC), which has been set up to consider nationally significant infrastructure projects like this one. Full details of the IPC and its process can be found online by visiting <http://infrastructure.independent.gov.uk/>. The IPC examines and – where they are in force – determines applications in accordance with relevant National Policy Statements (NPS). For the Project, this will be the overarching NPS (EN-1) and the renewables NPS (EN-3). Both can be found in draft at www.energy.npsconsultation.decc.gov.uk/home/intro. It is anticipated that the draft NPSs will be approved by the government before the IPC determines Covanta's application.

The Project is an environmental impact assessment development. Covanta is legally required to explain to the public, businesses and people living in the vicinity of the land on which the Project will take place, how it will consult with regard to the proposed application, preliminary environmental information and the Project. This is the purpose of this Statement and a more detailed document explaining its consultation approach is available on the Covanta web site.



The proposed Rookery South Resource Recovery Facility

In November 2008 Covanta began the consultation programme. In July and August 2009 at public exhibitions Covanta listened closely to what people had to say about the Project and scoped the environmental matters that would have to be studied as part of an environmental impact assessment. Covanta thanks everyone who has taken part so far – many of your ideas and comments have been taken on board.

The ongoing consultation with organisations, including the Rookery South Community Liaison Panel (CLP), has been fed into the evolving design of the Project. Covanta wishes to share the detailed (but still draft) proposals with the public, tell you how your views have so far influenced the Project and publish preliminary environmental information stemming from Covanta's emerging environmental impact assessment. The preliminary environmental information will explain the Project, set out the alternatives considered and present the emerging findings of the environmental impact assessment on noise, air quality, landscape, traffic and other environmental topics. Other draft application documents will also be made available over the next two months and will be available to view on the Covanta website. Please check back regularly for updated information.

Covanta is consulting local authorities, other legally defined organisations and the public with regard to these documents. You will also be able to read this information at the exhibitions and locations listed below and on our website. We can supply copies for a small charge. A Non-Technical Summary of the preliminary environmental information is available for free. It is important for Covanta to explain how Project benefits – such as energy generation, waste management, community trust funds and job creation – are secured, but also to point out negative implications of the Project such as traffic, noise and visual impact and how they will be managed. Covanta is also proposing a Development Consent Obligation to help secure community benefits – and further details of these will be posted on the website when available.

Date	Exhibition Location	Time
6th March	Millbrook Village Hall	10am – 6pm
12th March	Marston Moretaine Village Hall	10am – 6pm
13th March	Houghton Conquest Village Hall	10am – 5pm
14th March	Parkside Hall, Amphill	10am – 6pm
20th March	Stewartby Village Hall	10am – 6pm

Covanta need to hear from you now!

Your opinion on both the Project and the preliminary environmental information is important. It will be considered as Covanta completes the environmental impact assessment and submits the application to the IPC. During February and March Covanta will be stepping up the programme of community consultation, encouraging you to consider the plans and read the newly published preliminary environmental information. During this time Covanta will:

- Deliver a letter explaining the Project to 15,000 addresses within 5km of the site. A copy of this letter is available on the website.
- Continue meetings with the Rookery South Community Liaison Panel – agendas and notes from the meetings are available on the website.
- Hold staffed exhibitions and workshops in the area (see table below). You will be able to speak to professional advisors on a one-to-one basis and accurate photomontages and computer modelling showing how the Project would appear in the landscape will also be included.
- Fly balloons over the site on several dates (subject to confirmation of technical feasibility and safety issues) to indicate the maximum height of the built development including the chimney.
- Provide a permanent exhibition of our proposals at the Forest Centre in Marston Moretaine, from 7th March to 4th April (excluding local exhibition dates).

- Write directly to those people who have asked to be kept informed as well as local community, environmental and business groups including councillors, MPs and CLP members advising them of the exhibitions and the proposals – some 220 recipients.

- Publicise the Project and the exhibitions in Bedfordshire and the wider area via news releases to the local papers, radio and television and by advertisements in local papers.

- Display posters, adverts and flyers throughout the locality encouraging people to find out about the Project and make representations.

- Place documents, plans, maps and the preliminary environmental information that describe the Project at Bedford Central Library, Amphill Library, Wootton Library, Borough Hall Bedford Borough Council, Priory House Central Bedfordshire Council, Marston Vale Forest Centre and Covanta's offices in Eversholt until 5 April 2010.

To help local communities understand and engage with the IPC process, Planning Aid is an initiative that provides free independent and professional advice and support to communities and individuals who cannot afford to pay planning consultants' fees. For further information visit: www.planningaid.rtpi.org.uk.

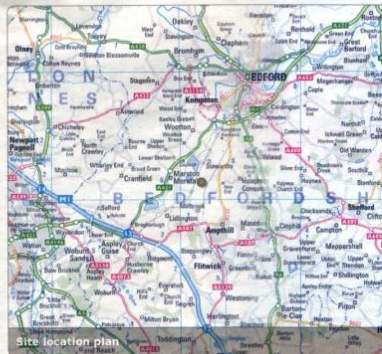
To learn more about the Project and to tell Covanta what you think, please:

- visit the website www.covantaenergy.co.uk/site/rookerysouth/
- email at RookerySouth@covantaenergy.co.uk
- call on 0844 967 1101
- write to: Covanta Unit 7, Water End Barns, Water End, Eversholt, Milton Keynes, MK17 9EA (ref: Rookery South Consultation)
- use the Freepost feedback form available from the Rookery South exhibitions

Covanta need to hear from you by 5 April 2010

Your response in respect of the Project, preliminary environmental information and the consultation methods described in this Statement of Community Consultation MUST be received by Covanta in writing using the post or email methods outlined above on or before 5 April 2010. All responses MUST state the grounds of your response or representation; tell Covanta who is making the response or representation; and provide an address to which correspondence relating to the response or representation may be sent. Please note, your responses and other representations will be made public.

Covanta Rookery South Limited



Site location plan

www.covantaenergy.co.uk/site/rookerysouth/

0844 967 1101

www.covantaenergy.co.uk

COVANTA
ENERGY
for a cleaner world

Notices Publicising the Proposed Development

- 7.2.9. At the same time as publishing the SOCC, Covanta also published statutory Notices Publicising a Proposed Development Consent Order to meet section 48 of the PA 2008 and regulation 4 of the Infrastructure Planning Regulations 2009 as follows: Bedfordshire Times and Citizen on 18 and 25 February 2010; The Times 19 February 2010; and the London Gazette 19 February 2010. Copies of each of these advertisements as appearing in each publication are at Appendix 24.

Complying with the SOCC

- 7.2.10. Covanta is required by section 47(7) of the PA2008 to comply with the terms of the SOCC. It has done this by:
- 1) delivering letters to 15,000 addresses within 5km of the site;
 - 2) continuing to hold meetings with the CLP;
 - 3) holding six public exhibitions (including one permanent exhibition) in March 2010 (see section 8 below);
 - 4) holding workshops as requested at the above exhibitions (see section 8 below);
 - 5) flying balloons over the site to illustrate height of the proposed building and stack;
 - 6) writing directly to all those who asked to be kept informed as well as the local community, environmental and business groups (some 230 recipients, as listed in Appendix 9);
 - 7) publicising the project and exhibitions in Bedfordshire and the wider area through press releases, advertisements, radio and television (see section 8 below);
 - 8) Placing the PER at local libraries, Council offices, Covanta's Eversholt offices, and the Forest Centre; and
 - 9) the Covanta website, with pages dedicated specifically to the Project carrying CLP meeting notes, current draft documents and other relevant information.

7.3. Notification of IPC

- 7.3.1. In compliance with s46 (1) of the PA 2008, Covanta notified the IPC of its intention to submit an application for a DCO. Covanta's legal representative sent a letter to the IPC on 18 February 2010 to this effect (see Appendix 57).

7.4. IPC Environmental Scoping

- 7.4.1. This section refers to responses received via the IPC, and independently, to the EIA Scoping Reports submitted by Covanta to the IPC.
- 7.4.2. Although not required to do so under legislation, Covanta submitted an Environmental Scoping Report (as included in Appendix 5.2 to the ES accompanying the DCO application) to the IPC in December 2009, requesting a scoping opinion under Regulation 8 of the Infrastructure Planning Environmental Impact Assessment Regulations 2009.
- 7.4.3. The IPC formally consulted 120 prescribed organisations (see Appendix 25 for the full list) including local and neighbouring councils, and other relevant bodies. Of these, replies were received from the following (a total of 43):

Anglian Water Services Regulation Department

Aylesbury Vale District Council

Bedford Borough Council

Bedford Group Drainage Boards

Bedfordshire and Luton Local Resilience Forum

Bedfordshire PCT

Buckinghamshire County Council

Central Bedfordshire Council

Chilterns Conservation Board

Covanta Rookery South Limited

Cranfield Parish Council

Dacorum Borough Council

East Northamptonshire Council

East of England Development Agency

East of England Regional Assembly

English Heritage

ES Gas Group

Freightliner Limited

Fulcrum Pipelines Limited
Houghton Conquest CP
Huntingdonshire District Council
Kempston Town Council
Marston Moretaine CP
Millbrook CP
National Grid
Natural England
NERL
Network Rail Infrastructure Ltd
NHS East of England
OFWAT
Royal Mail Group
The British Waterways Board
The Civil Aviation Authority
The Coal Authority
The Commission for Architecture and the Built Environment
The Crown Estate Commissioners
The Environment Agency
The Forestry Commission
The Health and Safety Executive
The Health Protection Agency
The Marine and Fisheries Agency
The Maritime and Coastguard Agency
The Office of Rail Regulation

7.4.4. Copies of these responses are appended to the IPC Scoping Opinion (see Appendix 5.3 of the ES).

7.4.5. In addition to the bodies contacted by the IPC, Covanta independently requested a response to the Environmental Scoping Report from 52 non-prescribed consultees (Appendix 26 for a full list). Eight responses were received through this route:

Natural England
Highways Agency
Ridgemont Parish Council

Revamp
Ramblers Association
CRCE Consultation Coordination Team
RSPB
Ghislain Pascal and Chris Jones

- 7.4.6. CBC also received some responses to the Environmental Scoping Report from non-statutory consultees direct and these were forwarded to Covanta. CBC sent a standard letter back to each of the consultees outlining the IPC application process and letting the recipient know that their letter had been passed to Covanta (see Appendix 27).
- 7.4.7. The response of Covanta to these comments and how they were taken into account is set out at Appendix 5.4 of the ES accompanying the DCO application.
- 7.4.8. In April 2010 the IPC published their formal Scoping Opinion (Appendix 5.3 of the ES accompanying the DCO application).

7.5. Landowner Consultation

Requirement for Landowner Consultation

- 7.5.1. Section 42 of PA2008 requires that prospective applicants under its terms must consult persons listed in categories set out in section 44 of the Act. These comprise: owners, lessees, tenants and occupiers of the land; those with interests in the land, or having power of sale or to release the land; and those who may be eligible to make claims under two specific statutory provisions relating to injurious affection as a result of the effect of a Project upon their land.
- 7.5.2. The purpose of this consultation is to ensure that those whose land may be affected are able to make representations about a project. This is especially important where a project may include powers to acquire land compulsorily or compulsorily to interfere with rights of a person in or over land. Such powers are envisaged by s122 PA2008, as well as by section 120(4) PA2008 and schedule 5 to that Act.
- 7.5.3. Where compulsory powers may be invoked the CLG document 'Planning Act 2008: Guidance related to procedures for compulsory acquisition' applies. This

states that an applicant must comply with s42 and 44 PA2008, but also emphasises the importance of this Report. As paragraph 20 of the Guidance points out, it should be demonstrated that all reasonable alternatives to compulsory acquisition have been explored so that the exercise of compulsory powers is legitimate and can be shown to be necessary and proportionate. It must be shown that interference with the Human Rights of those affected is justified. One such alternative is the acquisition of land by negotiation.

Covanta's Approach

- 7.5.4. The application includes powers of compulsory acquisition. Also, in particular, it includes powers to extinguish rights and interests in land. These provisions, contained in the draft DCO, affect property interests and, accordingly, the matters set out above are of particular importance. Therefore, Covanta has appointed Ardent, a firm of chartered surveyors specialising in compulsory purchase and land referencing, to manage this aspect of the Project.
- 7.5.5. Consultations with landowners and those with rights over land within the Application Site (see Appendix 28 for land covered by this area) commenced formally on 29 January 2010, with the issue of non-statutory Requisition for Information Notices (RFINS) (see Appendix 29) to 44 companies and individuals (see Appendix 30). This database was based on information obtained from HM Land Registry and Companies House. The covering letters accompanying the notices drew attention to the Project and Covanta's willingness to discuss it. The intention was to make sure that formal consultation under sections 42 and 44 PA2008 reached all relevant parties. The notice requested the address details, details of the freehold owner, details of the leasehold owner, details of the occupiers of the property and details of any other interests and or any power to sell or convey or release the property. Covanta requested a response to the notice within 14 days of receipt, a normal period for such notices.
- 7.5.6. Further letters were issued on 16th April 2010, one to parties with whom Covanta were offering to enter into discussions for the acquisition of land (see Appendix 31) and another to those with whom Covanta were offering to enter into discussions for the discharge of rights over the land affected (see Appendix 32). These letters were sent to those parties that Covanta either knew had an interest in land, or believed held such interests from initial investigations where there was an absence of a response to the RFINs. On 28

April RFINs were issued to Mr. Evans and the Highways Agency as these landowners had more recently come to light. Covanta has continued to attempt to make contact with all relevant parties as set out in the table at Appendix 33.

- 7.5.7. 31 one of the 46 recipients responded to these communications (see Appendix 33). Eleven of these respondents confirmed their interests in the land. Thirteen required more information, payment before dealing with the request, suggested alternative contacts or have not yet clarified whether they do or do not have an interest in land. Seven respondents confirmed that they did not have an interest in the land. Consultations with the landowners are continuing.
- 7.5.8. In accordance with sections 42 and 44 PA2008, on 18 February all landowners, as listed in Appendix 30, were sent a letter (see Appendix 38), which included the non-technical summary of the Preliminary Environmental Report (PER), and invited comments about the PER from the recipient to Covanta.
- 7.5.9. Eight landowners are also prescribed consultees for the purposes of issuing the EIA and the PER: the Environment Agency; BBC Highways Authority; CBC Highways Authority; Network Rail; Anglian Water Services; National Grid PLC; National Grid Gas PLC; and EDF Energy Networks. With the exception of National Grid and National Grid Gas, all these eight landowners have been consulted as technical consultees as well. O & H Properties, MVT, HA, Network Rail and London Midland Trains are the only organisations which would potentially be obliged to sell their land to Covanta. MVT and HA have been consulted throughout the pre-application stage as technical consultees. All responses to the PER consultation (including those from Landowners) are discussed in section 8.

7.6. Technical and Statutory Consultation

- 7.6.1. The series of meetings continued on through winter (December, January and February) 2009/10. Covanta and relevant members of its team met, or consulted, the following technical consultees and key stakeholders in relation to the Project:

Consultee	December 2009	January 2010	February 2010
Local Authorities	✓	✓	✓
English Heritage			✓
CABE	✓		
Forest of Marston Vale			✓✓
Environment Agency			✓
Internal Drainage Board			✓
Network Rail	✓		
Highways Agency			✓
Bedfordshire and Luton Fire and Rescue Service			✓
Potential Combined Heat and Power users	✓	✓✓	✓

7.6.2. Set out below is a summary, by organisation, of meetings held, the key feedback from the consultee and the key responses to that by Covanta. In some instances the outcome of consultation was intertwined, with near parallel meetings or close sequencing of meetings such that clear outcomes were difficult to disaggregate.

7.6.3. Appendix 4 contains a meetings tracker, which shows when meetings occurred and who attended.

Local Councils

7.6.4. Following the 3 June 2009 meeting with the BBC and CBC EHOs and Covanta's acoustic consultants a further meeting took place on **11 December 2009**. The results of the baseline noise levels survey were tabled. The survey showed that baseline noise levels can be very low and fall outside the scope of BS4142. A technical note, which proposed an alternative approach to assessment (based on PPG24 and BS8233), was tabled by Covanta. The BBC EHO acknowledged that there was no definitive guidance in this situation, and

that BBC judged each such case according to the individual circumstances.

The interim results of the noise model indicated that the operational phase of the Project should not result in unacceptable noise levels internally or externally. The EHOs requested confirmation of some of the technical aspects of the interim noise modelling report and advised that they needed more time to review its contents.

- 7.6.5. Key feedback from consultees: need more time to consider some elements of proposed assessment methods
- 7.6.6. Key response by Covanta: wait for response from EHOs after they have considered the proposed methods fully.
- 7.6.7. The BBC EHO responded to Covanta's noise consultant by email on **23 December 2009** and the CBC EHO responded by email on **4 January 2010**.
- 7.6.8. Key feedback from consultees: both EHOs' concerns were similar: both felt there was a possibility that external plant noise would have an impact on residential amenity, and they continued to query the interpretation of British Standards being applied to the Project in relation to noise. They also questioned the assessment methodology employed for collecting existing background noise levels.

CBC, Rights of Way

- 7.6.9. **5 February 2010** Covanta's landscape team met with the CBC Rights of Way Officer, (who is also dealing with the administration of BBC's rights of way which cross a small portion of the site) to review the proposed Rights of Way Strategy. Covanta's landscape consultants outlined the Rights of Way Strategy which CBC had discussed with FMV. CBC indicated that they were pleased with the proposal for the reconnection of the network. The structure of the procedures for dedication was discussed and the overlap with rights of way proposed as part of the LLRS. The potential footbridge over the railway line was discussed: CBC did not consider it necessary with a level crossing and the proposed improved links in the vicinity of Green Lane. The CBC officer confirmed that no further meetings relating to rights of way were necessary.
- 7.6.10. Key feedback from consultee: content with proposals, with some detail to be agreed; bridge over railway not required; requested that plans of Rights of Way and landscape strategy are issued to him and equivalent BBC officer.

- 7.6.11. Key response by Covanta: will issue as requested.

BBC and CBC Highway Authorities

- 7.6.12. Responses to the TA issued by Covanta in November were issued by CBC on 15 December 2009 and BBC on 18 December.
- 7.6.13. Key feedback from consultees: The consultees were generally content with the scope suggested as it followed guidelines set out by the Department for Transport, but proposed inclusion of some additional information.

English Heritage (EH)

- 7.6.14. On **2 February 2010** Covanta and relevant members of its team met EH to outline the IPC process and respond to the EH scoping response. Covanta described the content and purpose of the PER, the role of the CLP and the importance the IPC place on meaningful consultation. The CABE review and the then current design for the building, how it had evolved as a result of discussions with consultees, especially EH and CABE, and how it sat in the landscape were discussed. Drawings showing the location of the Nirah building (which had gained planning consent in September 2009) were tabled. The proposed Statement of Common Ground and the programme for the Application were also discussed.
- 7.6.15. Key feedback from consultee: would like to see modelling and information about the duration and frequency of the stack plume (the plume report was issued to EH on 23 December 2009 but receipt had not been acknowledged); Houghton House and Ampthill Park House are significant heritage monuments and EH would consider the impact on their setting (including views to and from them) when responding to the proposals; requested information about the technology proposed for the RRF and the impact this has on the size of the building. Noted that this building will change the existing views. Another meeting (after receipt of further information as below) and site visit would be required to progress the Statement of Common Ground.
- 7.6.16. Key response by Covanta: Will reissue Plume Report; will issue summary of key operational and technical considerations and details; will issue full and complete set of revised photomontages. Will arrange site visit and further meeting.

CABE

- 7.6.17. Revised information was issued to CABE on **3 December 2009** comprising a document entitled 'Information for Design Review' (see Appendix 34).
- 7.6.18. Key feedback from consultee: CABE responded on **11 January 2010** with their pre-application feedback to this information (see Appendix 34). In summary, the Commission's response was that the building should become more rectangular, with the curves lost, to produce a simpler and stronger design and reflect its industrial nature. They welcomed the varied height of the building, the visitor centre at the heart of the plant, and suggested a very carefully considered exterior colour scheme and further exploration of how the building could relate better to the immediate context.
- 7.6.19. Key response by Covanta: Between December 2009 and March 2010 Covanta's design team developed the building design with a second submission responding to the issues raised in the initial consultation and taking into account other consultation responses and internal design development matters. The 'Information for 2nd Design Review' was issued on **4 March 2010**.

Marston Vale Trust (MVT)

- 7.6.20. On **12 February 2010** Covanta and its design team met MVT to provide an update on the building design and the landscape and rights of way strategies. CABE feedback was discussed. The development of the western elevation of the RRF building (which faces the Forest Centre) including green walls and brown roofs was presented. Opportunities for improving Green Lane were explored. Wider community benefits were discussed.
- 7.6.21. Key feedback from consultee: requested further consideration of the tipping hall boundary and a 'perched hedge'; endorsed rights of way strategy; outlined planting opportunities in Country Park to focus views away from RRF; will be applying for consent to erect a wind turbine.
- 7.6.22. Key response by Covanta: 30% woodland cover strategy and ideas for Green Lane to be presented at next meeting; agree mechanism for delivering planting within the country park with MVT trustees; would consider the wind turbine proposal when it came forward.

- 7.6.23. Covanta presented the proposals to the full MVT board of trustees on 17 February 2010.

Environment Agency (EA) and River Ivel Internal Drainage Board (IDB)

- 7.6.24. Covanta's hydrology consultants met the EA and IDB on 08 February 2010 to provide them with an overview of the surface water drainage and flood risk management strategy and associated design principles for the LLR scheme and the RRF application. The drainage system had been designed to consider residual risk scenarios of: (i) a 1 in 100 year plus climate change event and a 3 day period of failed pumps and (ii) a 'follow on' event of a 1 in 10 year plus climate change event occurring within 1 week of the first scenario. The drainage system had also been designed to accommodate a 1 in 1000 year event. Floodwater would be directed into the surface water balancing pond.
- 7.6.25. Key feedback from consultees: the drainage system design meets and exceeds the scenarios typically required by the EA; the flood risk management strategy is appropriate; the flood risk assessment (FRA) should include likely velocity of floodwaters and consideration of the flood hazard matrix set out in DEFRA/EA R & D Technical Report FD2320/TR2; agreed that a blockage of the culvert beneath the railway was very unlikely; agreed that the RRF proposal would be classed as 'nil detriment' in terms of off-site/downstream flood risk impacts; requested that details of the hydraulic modelling analysis are included in the FRA for the RRF submission; if the FRA is prepared in accordance with the design principles discussed, it would meet with the EA/IDB's approval.
- 7.6.26. Key response by Covanta: will refine FRA as discussed.

Network Rail

- 7.6.27. On **21 December 2009** Covanta and Network Rail (NR) spoke by the telephone. NR confirmed that it had received traffic modelling data from Covanta, and had fed this in to its own risk model to test scenarios at the Green Lane level crossing. It had concluded that installing a full barrier crossing would provide full mitigation of the impact of additional vehicular traffic associated with the Project. Covanta would be responsible for commissioning and producing a design proposal for submission to NR. The cost of implementing the proposal would be met by Covanta.

7.6.28. Key feedback from consultee: full barrier crossing at Green Lane would provide full mitigation. Covanta to meet cost.

7.6.29. Key response by Covanta: will include in proposals.

Highways Agency

7.6.30. A response to the TA issued in November was sent by the HA on 7 December 2009.

7.6.31. Key feedback from consultee: the HA was generally content with the scope suggested as it followed guidelines set out by the Department for Transport but proposed inclusion of some additional information.

7.6.32. On **8 February 2010** Covanta's highway consultant attended a meeting with the HA, CBC and BBC to discuss the scope of the TA and update the bodies on the progress of the scheme.

Bedfordshire and Luton Fire and Rescue Service (BLFRS)

7.6.33. On **26 February 2010** BLFRS responded to an email sent by Covanta's consultants on 12 February 2010.

7.6.34. Key feedback from consultee: stated minimum dimensions required for fire access, stated that an alternative emergency access route was required. Further consultation (see Section 8) resulted in BLFRS withdrawing this requirement.

7.6.35. Key response by Covanta: will issue risk assessment to enable further consideration of need for alternative access.

Potential Combined Heat and Power Users

7.6.36. Presentations were made and discussions entered into with the seven potential users identified by November 2009. Meetings were held on **7 December 2009** with Center Parcs, **22 January 2010** with O & H Properties, the developer for Marston Moretaine and Stewartby, and **18 January** and **17 February 2010** with Gallagher's, the developer for Wixams. In summary, the outcomes of these consultations are described below.

- 7.6.37. Nirah: some uncertainty about the proposed development needs to be resolved before any definitive discussions are held. Covanta will provide initial details of the options available for energy supply.
- 7.6.38. Wixams: in August 2010 development of scope of the local energy infrastructure design for the scheme will begin, allowing Covanta and the developer, Gallagher, to establish a commercial basis for any development agreement.
- 7.6.39. Center Parcs: the programme for this development is significantly ahead that of The Rookery RRF and its initial design is based on a local energy solution, retaining the option of connecting to the EfW at a later date.
- 7.6.40. Stewartby: the scheme is committed: work has begun and will be completed in advance of the EfW facility being operational. Retrofitting, in conjunction with further development at a later date, would be the only option.
- 7.6.41. Marston Moretaine: initial discussions with the developer are positive. Covanta are to develop an outline solution for presentation to the developer in August 2010.
- 7.6.42. Millbrook Proving Ground: initial discussions have provided the basis for development of a CHP scheme. Covanta are to supply an initial scope of proposed services to the developer in August 2010.

7.7. Conclusion

Summary of consultation impacts on design winter 2009/2010

- 7.7.1. From the feedback received from consultees during this period, the main points to be addressed are summarised below by reference to the relevant environmental issues.

Issue	Consultation Result
Visual/landscape	Building design further developed to minimise size and visual impact. Colour of building reconsidered. Landscape design adjacent to building and off-site further developed to minimise visual impact and integrate better into immediate setting.
Ecology	Habitats to be established through consideration of brown roofs. Off site tree planting at FMV.
Rights of Way	Strategy further developed. Bridge over Marston Vale Branch Railway not required.
Surface water	Drainage design and flood risk management strategy likely to be acceptable.
Rail	Upgrade to full barrier required at Green Lane level crossing. Exploration of emergency access.
Safety considerations	Consideration of secondary access for emergency vehicles may be required. Risk assessment to be undertaken. See also section 8 below

7.8. Ongoing consultation

- 7.8.1. The next stage of consultation was focused on the public exhibitions illustrating how the design and proposals for the RRF had developed and become more crystallised providing clarity on potential effects. It was agreed that balloons would be flown within the site to assist the public in understanding the location and scale of the buildings as part of the public exhibition. The outcome of the plume study was also to be more widely consulted upon to provide clarity on matters raised.

8.0 Spring/Summer 2010 Consultation

8.1. Introduction

- 8.1.1. This period covers March, April, May and June 2010. Consultation activities included publication of the Preliminary Environmental Report; Public Exhibitions; and continued Technical and Statutory consultation including preparation of Statements of Common Ground (SoCG).

8.2. The Preliminary Environmental Report

- 8.2.1. The Preliminary Environmental Report (PER) and Non-Technical Summary (NTS) of this document were produced by Covanta in February 2010 and publicised via (and in accordance with) the SOCC and newspaper advertisements. The PER contained preliminary environmental information in accordance with Regulations 2 and 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009. The two documents explained the Project generally and described the preliminary environmental effects predicted as a result of the Project being constructed and operating.
- 8.2.2. The documents were placed in three local libraries, the offices of CBC and BBC, Covanta's offices at Eversholt and Marston Vale Trust Centre in Marston Moretaine. They were also available to read on the Covanta website. Details of how to respond to consultation were set out in the foreword of the PER and other publicly distributed information e.g. letters and press releases.
- 8.2.3. Letters dated 18 February 2010 were sent by Covanta to three groups of consultees, enclosing either the PER and the NTS or just the NTS and requested comments in response.
- 8.2.4. 128 prescribed consultees received a full copy of the PER and the NTS. The list of recipients is given in Appendix 35 and included, in addition to those listed as statutory consultees for the IPC scoping exercise, 28 neighbouring local authorities, in line with CLG guidance. The accompanying letter is in Appendix 36. 39 responses were received (EH sent two responses). 11 of these respondents stated that they had no comment or objection, or simply acknowledged receipt. 15 of the responses came from local authorities, including parish councils. Those who responded were:

- 1) Fulcrum;
- 2) Chilterns Conservation Board (no comments/objections);
- 3) Network Rail;
- 4) English Heritage (two responses);
- 5) Civil Aviation Authority;
- 6) CABE;
- 7) Anglian Water;
- 8) Central Bedfordshire Council (Cllr Gary Summerfield);
- 9) Central Bedfordshire Council (Cllr Tom Nicholls);
- 10) National Grid;
- 11) Buckinghamshire County Council;
- 12) The Environment Agency;
- 13) East of England Development Agency;
- 14) East of England Local Government Association;
- 15) Cranfield Parish Council;
- 16) The Health and Safety Executive;
- 17) Bedford Borough Council (Cllrs Hill and Cunningham);
- 18) St. Albans City and District Council (no comments/objections);
- 19) Maritime and Coastguard Agency (no comments/objections);
- 20) Wales and West Utilities (no comments/objections);
- 21) Scotland Gas Networks (no comments/objections);
- 22) Hertfordshire County Council (acknowledged receipt);
- 23) The Coal Authority (no comments/objections);
- 24) ES Pipelines LTD;
- 25) Fastline Ltd;
- 26) The Health Protection Agency;
- 27) RSPB (acknowledged receipt);
- 28) Natural England;

- 29) NHS Bedfordshire;
- 30) EDF Energy Networks (acknowledged receipt);
- 31) Cambridgeshire County Council;
- 32) Marston Moreteyne Parish Council;
- 33) East Herts Council (no comments/objections);
- 34) Lidlington Parish Council;
- 35) Elstow Parish Council;
- 36) Millbrook Parish Council;
- 37) East Northamptonshire Council; and
- 38) The Joint Nature Conservation Committee (no comments/objections).

8.2.5. As part of its ongoing engagement with consultees, Covanta is writing to each of these parties individually in order to address the points that they have made and explain how the Application has addressed them.

8.2.6. 44 landowners, who are parties with an interest in land that may be affected by the Project, received formal notice of the prospective application and the NTS. The list of recipients is given in Appendix 30 and the accompanying letter is in Appendix 38.

8.2.7. 146 non-prescribed consultees also received the NTS. Comments about the Project and the PER were requested from these parties by 5 April 2010. The list of recipients is given in Appendix 39 and the accompanying letter is in Appendix 40. 25 responses were received with one respondent stating that they had no comment. In summary, the main issues in order of frequency were:

- a) the need for justification of the selected site and its catchment area and how this impacts on climate change;
- b) visual impact;
- c) polluting air-borne and water-borne emissions;
- d) impact of increased levels of traffic;
- e) noise and loss of tranquillity; and
- f) conflicts with adjacent land-uses and aspirations for the area.

- 8.2.8. Due to the large number of responses to the PER, copies of the actual letters are not included in this document. They are, however, available from Covanta on request. Responses to the PER from the general public were recorded in the Information Line and Web Enquiries database, which is discussed below.

8.3. Public Response to the PER, including Information Line and Web Enquiries

- 8.3.1. From January to the beginning of July 2010 Covanta has logged over 350 responses received via the information telephone line, website and post. Some people raised several queries in the same response. A spreadsheet showing the full record of these is given in Appendix 42, and this includes the record of responses to the PER by the general public, in addition to feedback forms from the exhibitions. Some individuals from other groups of consultees also used the phone line and email to respond to the PER. The precise query was recorded each time but they tended to fall within 1 of 20 categories, which were set prior to the opening of the information line and based on the section headings subsequently used in the PER document. Type 19, press enquiries was added later. The frequency of each query type is given below:

01	What is the PER? What am I to do with it?	18
02	Postal complaints or errors	13
03	Exhibition Dates and Details	6
04	About Covanta	44
05	Planning Policy and Process (including IPC)	9
06	Where/how can I get more information?	15
07	Transport and Access	118
08	Hydrology and Flood Risk	2
09	Health Issues and Air Quality	139
10	Noise	19
11	Landscape and Visual Impact	73
12	Cultural Heritage	2
13	Ecology and Nature Conservation	26
14	Land and Water Quality	3
15	Socio Economics	39

16	Design, Size and Construction of the Project	63
17	General Amenity	2
18	Other	151
19	Press Enquiries	6
20	Acknowledgement of Support	14

8.3.2. The action taken as a result of each query is recorded in Appendix 42. In some cases a response could be given immediately over the phone. In other cases a letter or email were considered more appropriate.

8.3.3. The records show that, of specified query types, health issues and air quality was raised most often (139), followed by transport and access (118), then landscape and visual impact (73), and design, size and construction of the project (63). Very few queries were raised about land and water quality (3), hydrology and flood risk (2), cultural heritage (2) or general amenity (2).

8.3.4. Due to the large number of responses to the PER, copies of the actual letters are not included in this document. They are, however, available from Covanta on request.

8.3.5. The principle issues that the correspondents listed in paragraph 8.2.4 raised, and the way in which their responses to consultation have influenced the Project, are explained below:

- 1) loss of amenity of local residents through increases in traffic - Covanta has undertaken a Transport Assessment and the ES (Chapter 7) that accompanies the application addresses transportation matters. Both conclude that there will be few, if any, instances of traffic that would impact upon the amenity of residents. The main routes to the RRF do not lie through populated areas. Indeed, the route does not pass outside any residential properties between the A421 and the entrance to the Application Site. Nevertheless, in order to ensure that this is the case, Covanta proposes to submit to a lorry routeing strategy that will be secured by a Development Consent Obligation under s106 Town and Country Planning Act 1990 (as amended by the PA 2008) (DCOb);
- 2) emissions, noise and loss of fine views due to the size of the development - Again, the ES (Chapter 9) deals with emissions and with noise effects of

the Project (Chapter 8). Chapter 10 of the ES addresses landscape and visual impacts. The assessments concluded that the noise and air quality effects of the Project are entirely acceptable, to the extent that any residual effects will occur after mitigation is put in place and this will be secured by requirements attached to the DCO. The assessments of landscape and visual effects of the Project do not indicate that any fine views will be lost. Nevertheless, Covanta's design team has striven to produce a design for the buildings and a Landscape Strategy that respect the changing environment of the Marston Vale and the "audiences" that view it. Indeed, the entire form of the building has been modified in discussion with consultees over the design period, resulting in an honest building design that achieves just that level of respect and this has been recognised as a successful approach by CABI.

- 3) the size and location of the plant need to be fully justified in relation to the available waste, the catchment area and impact on climate change - Covanta has responded to these concerns when raised throughout the consultation process. As a result it has included additional application documents that address these points. In certain circumstances, early drafts have been shared with consultees. Thus, the Engineering Design Statement explains the correlation between prospective plant throughput and its scale. It indicates that the size of the plant and the building which houses it are very closely linked. The Need Assessment explains the available waste arisings in the catchment area that Covanta has identified as well as the paucity of available waste treatment capacity. The WRATE, Carbon and Efficiencies of Scale Report deals with the performance of the Project in relation to important climate-change measures. It concludes that the Project is sustainable, is a renewable energy project and has real benefits in terms of production of carbon emissions over alternative solutions;
- 4) the rail access scenario should be fully assessed - Ever since it identified Rookery South Pit as a prospective site for an EfW facility Covanta has been mindful of the site's positioning between two railway lines and scope for a rail served EfW facility. With this in mind, and following feedback from consultees it commissioned Arup to review the prospects for rail-served waste contracts in its identified catchment area and the infrastructure that

would be needed on site to allow trains to be unloaded at the RRF. This report accompanies the application;

- 5) ecological impacts need to be fully assessed - The RRF will be constructed upon a base prepared by the Low Level Restoration Scheme being promoted by the owners of the Application site. The LLRS provides extensive ecological works, including a translocation area for displaced species. Following the LLRS, the base of Rookery South Pit will be of low ecological value. Where valued receptors remain, they will be protected during the construction and implementation of the Project. This has been verified by independent ecological assessment and reported in the ES. Similarly, the effect upon more remote sites and species has been assessed and found to be acceptable. In fact, by providing an enhanced landscape strategy the Project will enable habitat linkages to be established and an improved ecological setting;
- 6) the Health Impact Assessment is to be as broad as possible - The independent HIA that Covanta has asked to have carried out has been prepared in accordance with industry best practice. The HIA report is comprised in the Application as well as Covanta's response to its recommendations;
- 7) inadequate consultation with the local community had been undertaken - Although this point has been made, this report demonstrates that Covanta has exceeded the statutory requirements and guidance in respect of consultation for the Project. Covanta continues to publicise its activities and to meet consultees and the public. Its Community Liaison Panel continues to meet and Covanta's aim is to deliver a project that is part of the community and engaged with it. The DCOB will contain measures that ensure that representatives are able to meet Covanta on an ongoing basis and that information is available to the public, including via its website.

8.3.6. The information line and email facility will remain active during the IPC application period. The telephone number is 0844 967 1101 and the email address is: RookerySouth@covantaenergy.co.uk.

8.4. Public Exhibitions

- 8.4.1. An exhibition was set up at the Forest Centre in Marston Moretaine from 7 March to 4 April 2010, excluding the dates below. Public exhibitions were held on five days in March 2010 (see Appendix 43 for publicity posters):

Saturday 6th March at Millbrook Village Hall 10am – 5pm

Friday 12th March at Marston Moretaine Village Hall 10am – 6pm

Saturday 13 March at Houghton Conquest Village Hall 10am - 5pm

Sunday 14 March at Parkside Hall, Ampthill 10am – 6pm

Saturday 20 March at Stewartby Village Hall 10am – 6pm

- 8.4.2. An advertisement (see Appendix 44) was placed in the local newspapers 'Bedfordshire on Sunday' (28 February and 7 March), and 'Bedford Times and Citizen' (25 February, 4, 11 and 18 March) to publicise the exhibitions. On 9 March 2010 the Managing Director of Covanta wrote to the editor of Bedfordshire on Sunday, in response to two letters which had appeared in the newspaper (see Appendix 45) and encouraging visitors to the exhibitions. Press releases were made promoting the exhibitions (see Appendix 46).
- 8.4.3. The second exhibition was opened at 12 noon on Friday 12 March at Marston Moretaine Village Hall for approximately 130 key stakeholders and VIPs (see Appendix 47 for the full list), including local Councillors, council officers, MEPs and MPs, English Heritage, CABE, Environment Agency etc. Individuals were invited by letter on 3 March 2010 (see Appendix 48).
- 8.4.4. The IPC also used this opportunity to hold an Outreach Event, and met with stakeholders and interested parties to explain its role in considering Covanta's proposed RRF at Rookery South. The Outreach Event was chaired by the IPC's Chief Executive John Saunders and, after a presentation by the IPC case officer; there was an opportunity for attendees to ask questions about IPC procedures and the consultation process.
- 8.4.5. The purpose of the exhibitions and consultation was to explain the current proposals, describe how the scheme had developed since the previous round of exhibitions in Summer 2009 and explain the preliminary environmental findings.

8.4.6. At these exhibitions 16 information boards were on display (see Appendix 49). These covered the following areas:

- 1) What is Rookery South Resource Recovery Facility?, why energy from waste?, the need for Rookery South RRF, the EfW Process, the benefits and burdens of a larger EfW facility, why is Rookery South suitable?;
- 2) Community benefits feedback so far, design feedback so far, operational feedback so far;
- 3) Fixed design and operational parameters, unfixed design and operational parameters;
- 4) Preliminary environmental findings; and
- 5) What happens next?

8.4.7. Unfixed elements of the scheme were highlighted and feedback requested as to how Covanta should address these. Although concepts were advanced, unfixed aspects at this stage were:

- 1) proposed hours for delivery vehicles;
- 2) enhancement to rights of way;
- 3) proposed tree planting areas;
- 4) choice of material colours for the buildings;
- 5) approach to drainage of the site;
- 6) approach to lighting of the site;
- 7) lorry routing plan; and
- 8) sources of waste for the Facility.

8.4.8. Handouts were provided (see Appendix 50) and members of Covanta's team were present to answer questions from the public. In addition to responding to the exhibition, visitors were encouraged to respond to the PER, via a leaflet entitled 'Have Your Say' handed out at the exhibition (included in Appendix 50).

8.4.9. Feedback forms, the content of which had been briefly reviewed by the CLP, (see Appendix 51) and which covered all aspects of the exhibition, not just the unfixed parameters, were available and the results of these were analysed in

pie chart form (see Appendix 52). A summary of the main points of feedback is also included below. Responses to question 10 of the form, covering the unfixed parameters, can be found in Appendix 53.

- 8.4.10. Covanta team members present noted that informal discussions with visitors revealed that there was some concern about the proposed colour of the stack. This was not captured formally but new images with revised colour options have been produced and forwarded to English Heritage for their comments as a result. The other areas of concern brought out in conversation were traffic, noise and air quality.
- 8.4.11. On request, Covanta's representatives and technical consultants present at the exhibitions gave workshops on specific topic areas to explain and discuss particular issues.

Summary of Written Feedback from Exhibitions

- 8.4.12. The RRF exhibitions were attended by in excess of 550 people over the five consultation days held throughout the Marston Vale. In total 127 feedback forms were received.
- 8.4.13. The main concerns were the same as those raised in summer 2009, namely: integrating the building into the landscape, traffic and noise impacts. Other notable concerns included enhancing habitats and biodiversity, discounted electricity. 60% of those who attended had not visited last years' exhibitions.
- 8.4.14. When asked about general issues relating to Energy from Waste:
- 1) over 75% (89/117) of respondents thought that it was important to find alternative ways to generate electricity and heat.
 - 2) almost 70% (81/116) of respondents thought that generating energy from waste is better than sending it to landfill.
 - 3) almost 60% (63/107) agreed or strongly agreed that recovery of incinerator bottom ash for construction aggregate and metals is better than sending them to landfill. And more than half believed that recovering incinerator bottom ash and metal should take place on-site, rather than elsewhere.
- 8.4.15. Respondents were asked to record their most important concerns, with the following results:

- 1) The most important concerns mirror the results from the 2009 consultation exercise, with ensuring traffic impacts are as low as possible; integrating the building into the landscape, and ensuring noise impact are as low as possible scoring highest.
- 2) The impact of traffic was the highest priority with 23% (this was 27% last year) of respondents scoring this the highest concern. Noise was also a high priority with 17% (this was 17% last year), as was integrating the buildings into the landscape with nearly 15%, (this was 18% last year).
- 3) As with the previous consultation, other notable concerns included enhancing habitats and biodiversity and discounted electricity.

8.4.16. Respondents were asked about the exhibitions themselves and whether the panels and attendant staff provided clear and helpful explanations.

- 1) Focusing on the exhibitions, a third of people at the exhibition attended the previous July/August consultations. This means that Covanta has provided in depth information to a wider number of people in the Marston Vale area as more than 60% of people had not attended the previous exhibitions.
- 2) Of the respondents 70% said they have a good understanding of what The Rookery South Pit RRF project involves.
- 3) The majority of respondents attended the Stewartby Exhibition (nearly 30%), followed by Marston Moretaine (28%), which are geographically the two closest areas to where the proposed plant will be built.
- 4) 41% of respondents disagreed, or strongly disagreed, that the exhibitions had provided a clear explanation of why the proposals are in Rookery South pit. 40% disagreed or strongly disagreed that the exhibitions had provided a clear explanation of changes made to the proposals following consultation last summer and 40% disagreed or strongly disagreed that the exhibitions had provided a clear explanation of preliminary environmental information.

8.4.17. Respondents were asked about Covanta's response to the feedback received at the previous exhibitions. The majority of respondents, more than 75%, believed that Covanta had responded to the feedback received from last year's exhibitions. Of these, 50% believed that Covanta had responded in part and 23% believed Covanta had listened and responded.

Unfixed Parameters

- 8.4.18. The still unfixed parameters of the Project were listed and suggestions requested for how these should be progressed. Appendix 53 captures all responses to this question. These parameters are listed below with a brief explanation of the final fixed parameter and the reasons for the final parameter. A summary schedule of the main comments relevant to each parameter is provided. It should be noted that responses on the unfixed parameters were only sought on some items which are identified by the presence of a schedule.

Hours of proposed vehicle deliveries.

- 8.4.19. The hours suggested by Covanta were 5am to 11pm Mon-Sat and none on Sundays.
- 8.4.20. 98 responses were given. 1 agreed with the proposed hours, 67 disagreed and gave objective answers, 30 were subjective responses or disagreed outright with the Project.
- 8.4.21. Comments on the feedback form were:
- 1) a range of hours were proposed as an alternative but generally limiting them from 8am - 6pm;
 - 2) there was concern expressed in relation to the effect on existing peak hour movements;
 - 3) concern was expressed regarding noise pollution experienced as a result of early and late vehicle movements;
 - 4) how the delivery hours would be enforced;
 - 5) there should be no weekend deliveries;
 - 6) deliveries should occur at night and only via routes away from houses; and
 - 7) a number of people questioned why rail deliveries were not considered.
- 8.4.22. Covanta's response: No alteration to the delivery hours detailed in the PER is proposed. Following consultation with operators the scope of operational hours has been confirmed as critical, with the hours relating to the anticipated operational movements from the relevant waste sources which have also been confirmed during further discussions with Covanta's operational team. The hours of operation and the vehicular movement associated with the operation

are detailed in Chapter 6 of the Design and Access Statement (DAS). Many of the responses expressed concern about vehicle movements outside of 'normal working' hours. 75 % of the movements are predicted to occur between the hours of 8am and 5pm, with a relatively limited quantity of vehicle movements outside of these hours. The site has been designed to allow future rail connection should it be considered feasible to bring waste via the rail network at a future point and this matter is addressed in section 6 of the DAS. A noise assessment has been undertaken as part of the ES to provide information to address concerns regarding noise levels.

Enhancements to Rights of Way

8.4.23. 58 responses were given. 5 agreed with the proposals, 22 disagreed and gave objective answers, 31 were subjective responses or disagreed outright with the Project.

8.4.24. Comments on the feedback form were:

- 1) the proposed routes would have to be carried out anyway;
- 2) provide safe parking for users of the lake;
- 3) who will pay for maintenance costs;
- 4) loss of visual amenity;
- 5) include the provision of bridleways;
- 6) consider disabled access;
- 7) no one will walk near the Project; and
- 8) OK.

8.4.25. Covanta's response: The rights of way proposals detailed in the PER are to be provided as an identified enhancement to the rights of way network with portions of that provision to be carried out as part of the LLRS. It is not the case that these enhancements would be achieved without the Project. The form of agreement on maintenance of the routes will be subject to agreement at a future date. The routes are all generally flat or at a shallow gradient such that they will be accessible to all user groups. No provision is to be made for bridleways - the routes are intended to form an extension to existing patterns of use in the Country Park. There are no bridleways in the immediate area to link to. The footway provision along Greenlane has been developed further since

the PER, and proposals to provide a more formal access to the Country Park from Stewartby have been detailed.

Proposed Tree Planting Areas

8.4.26. 77 responses were given. 10 agreed with the proposals, 33 disagreed and gave objective answers, 34 were subjective responses or disagreed outright with the Project.

8.4.27. Comments on the feedback form were:

- 1) provide as much tree planting as possible;
- 2) a number of comments were made about large scale camouflage and screening with trees by providing more;
- 3) make sure there is a good variety of trees;
- 4) depends on what type are planted and how managed;
- 5) concern expressed about amount of time to take to screen building;
- 6) more big trees between Forest and site;
- 7) planting of the community forest will obviate this; and
- 8) OK

8.4.28. Covanta's response: The planting areas proposed as part of the landscape strategy and detailed in the PER are to be retained and have been extended as the Project has moved forward including the provision of additional planting within the Country Park, which is expected to achieve more than 30% cover. The species and size of stock has been developed in discussion with the MVT based on the success of planting undertaken within the Country Park. Larger stock is proposed to the south west in what is considered to be one of the most sensitive areas of the site. The long term management of planted areas will be subject to agreement and is identified as a future undertaking. The planting proposals are detailed in Chapter 7 of the DAS.

Choice of Material Colours for the Buildings

8.4.29. 59 responses were given. 4 agreed with the proposals, 21 disagreed and gave objective answers, 34 were subjective responses or disagreed outright with the Project.

8.4.30. Comments on the feedback form were:

- 1) pastel shades to enable blending with environment;
- 2) blend in with the countryside/skyline;
- 3) visual impact seems to have been kept small but difficult to judge;
- 4) living wall sounds good;
- 5) chimney stands out too much/a more subtle colour;
- 6) if all was below ground it would be better green/brown; and
- 7) too intrusive needs to be more eco friendly. Green/sedum based roofing

8.4.31. Covanta's response: The general strategy for selection of colours for the buildings has been further refined since its presentation in the PER. In particular the colour of the chimney stack has been revised to represent a closer match to the Stewartby brick stacks and the range of colours appropriate for use on the buildings developed with a more subtle range to assist in blending with the countryside.

Approach to Drainage of the Site

8.4.32. 50 responses were given. 6 agreed with the proposals, 19 disagreed and gave objective answers, 25 were subjective responses or disagreed outright with the Project.

8.4.33. Comments on the feedback form were:

- 1) OK;
- 2) it is important for birds and wildlife;
- 3) ensure there is no flooding effect;
- 4) maintaining the hydrology seems to be catered for;
- 5) should be contained on site if hazardous and then allowed to naturally flow away;
- 6) consider climate change;
- 7) use wind power to pump water;
- 8) need more detail about leachates;
- 9) further information needed to inform opinion; and

10) to be self contained most energy produced will be used for pumping

- 8.4.34. Covanta's response: No change to the drainage design illustrated in the PER is proposed apart from minor design development since the consultation. The main drainage works from part of the approved LLRS scheme and the assessment of flooding risk has been fully assessed and recorded in the ES including consideration of climate change. The LLRS scheme includes a pump house which pumps water from the attenuation lake to Stewartby Lake. The RRF issues any water into the attenuation pond that cannot be recycled and stored for reuse in the RRF Water Operations Area. Water quality and wider hydrology matters are detailed in the ES.

Approach to Lighting of the Site

- 8.4.35. 58 responses were given. 2 agreed with the proposals, 35 disagreed and gave objective answers, 21 were subjective responses or disagreed outright with the Project.

- 8.4.36. Comments on the feedback form were:

- 1) should be minimal, no external lighting after 8pm, or after 11pm till dawn;
- 2) low level, non intrusive, eco friendly, PIR censored;
- 3) looks good pretty dark;
- 4) concerns about disturbance to wildlife;
- 5) acceptable but not wanted;
- 6) lighting needs to be sympathetic with the countryside i.e. not having bright lights during the dark;
- 7) minimization of stray light, avoid light pollution if possible hooded lightshades; and
- 8) critical that light pollution to the south east is reduced.

- 8.4.37. Covanta's response: No change to the lighting design illustrated in the PER is proposed, as feedback suggested that it has been accepted in principle. Further detail has been provided in the application regarding the proposed operational hours for certain areas of the site and a more detailed lighting layout is provided as part of the application with night time montages from

agreed locations. Certain operational areas do not require illumination during the hours of darkness and this has been clarified. Low level lighting has been provided on the ramp approach to the tipping hall to minimise effects and all column lighting will be downward facing and hooded. The lighting design has been coordinated with the Project ecologists. The lighting has been designed in accordance with the appropriate lighting standard for the countryside context. Detail on the lighting design for the RRF is provided in Chapter 9 of the DAS.

Lorry routing plan

8.4.38. 75 responses were given. 1 agreed with the proposals, 50 disagreed and gave objective answers, 24 were subjective responses or disagreed outright with the Project.

8.4.39. Comments on the feedback form were:

- 1) should be routed via Marsh Leys and not Marston Moretaine;
- 2) concern over heavy traffic at rush hour;
- 3) why can't more be transported via rail and why can't it be rail only;
- 4) put site near M1 so HGVs don't have to go near villages;
- 5) make it impossible for lorries to deviate from routes;
- 6) who will enforce and must be agreed with high authorities;
- 7) concerned about distance waste travels, noise and dust;
- 8) road access is poor and site entrance is dangerous;
- 9) to use the A421 and include a dedicated turn off;
- 10) ban on lorries coming off B530;
- 11) not pleased with using old A421 as this will impact housing; and
- 12) essential before Project can go ahead;

8.4.40. Covanta's response: Further assessment work has confirmed acceptability of proposed routes. Careful attention has been paid to the routing of vehicles and operators regularly using the site will be monitored for routing compliance. The proposed site access junction design has been designed having regard for both safe level crossing use and existing traffic movement patterns. The access has been designed to make it more difficult for HGVs to turn left into

Stewartby and CCTV will be installed to monitor vehicle movements into and out of the site. The site has been configured to permit future rail connection should the feasibility of such transportation of waste be considered viable at a future date.

Sources of Waste for the Facility

8.4.41. 78 responses were given. 0 agreed with the proposal, 58 disagreed and gave objective answers, 20 were subjective responses or disagreed outright with the Project.

8.4.42. Comments on the feedback form were:

- 1) outside waste should not be trucked in;
- 2) should be non hazardous;
- 3) once built surely there will be pressure to bring waste from London;
- 4) waste from outside Bedfordshire must come by rail;
- 5) local residents to see a reduction in Council Tax as a consequence of facility; and
- 6) make sure contaminated waste is sealed during transport

8.4.43. Covanta's response: The proposed waste catchment area for the Facility has been considered by Covanta and is a suitable catchment reflecting a sustainable source of waste sufficient to supply the Facility and is not to be altered for the DCO application. This will be kept under review as waste procurement proceeds and may change as a result.

Other Matters

8.4.44. Responses on the feedback forms also raised a number of other matters, to which Covanta's response is set out below:

Provision of Footbridge Crossing over the Marston Vale Line

8.4.45. Covanta's response: The provision of the footbridge was welcomed by some consultees. However, the proposal for a combined foot and cycle bridge is not considered to be justified by anticipated use and will not be progressed. Discussions with the Marston Vale Trust, who are recognised as the principal amenity organisation in proximity to the site, have raised concerns over the

scale of the structure and anticipated use may not justify the high levels of cost when viewed in the balance. In addition, CBC's rights of way officer, whilst welcoming the proposal, does not consider it to be essential. Both organisations considered that a well designed, at grade crossing over the railway line at Green Lane in conjunction with an improved entrance setting to the Millennium Country Park would be at least as appropriate and should be explored further. The proposals for the level crossing and associated links are included in the application and are detailed in Chapter 6 of the DAS.

Roof form

- 8.4.46. Covanta's response: The design of the building illustrated in the PER is to be retained. It is considered to be the design that keeps the building height to a minimum and is a simple design resolution that integrates in distant views.

Rail Connection

- 8.4.47. Covanta's response: The proposal does not include the provision of a rail connection for the importation of waste material. A full report explaining the investigations into the use of rail has been submitted with the DCO application. The location of the building does however prevent future consideration of rail connection should the transportation of waste transfer to the rail network in due course.

8.5. Independent Media Coverage

- 8.5.1. Since the beginning of the pre-application consultation process, Covanta has mainly used local newspapers to publicise the Project; encourage engagement with the Project; and to promote the public exhibitions, through press releases, advertisements, the SOCC and DCO Notices.
- 8.5.2. In the latter phases of the pre-application consultation, the Project has been discussed on local radio and featured in letters from members of the public to the Bedford Times and Citizen on several occasions. On 27 May 2010 an article in the same newspaper announced the commissioning of the HIA and gave details of the HIA stakeholder meeting dates. Appendix 54 contains examples of media coverage. This coverage is evidence of public awareness of, and interest in, the Project.

8.6. The Community Newsletter

- 8.6.1. The first Community Newsletter was produced in June 2010 and was delivered to 15,000 properties within 5km of The Rookery South Pit (please see Appendix 55 for a copy). It included information about feedback to the PER received from statutory consultees and public feedback from the spring 2010 exhibitions.
- 8.6.2. The Managing Director of Covanta, Mr. Malcolm Chilton, thanked everyone who had attended the recent public exhibitions and announced the commissioning of the HIA as a result of PCT and HPA feedback. The newsletter went on to describe the HIA in more detail: what would be considered and the workshops planned.
- 8.6.3. The other main areas of concern highlighted by the feedback to the PER were addressed such as traffic and visual impacts. The newsletter was also used to address some inaccuracies presented in local media coverage including the size of the stack, and how EfW can and does coexist with high levels of recycling. The scale of throughput of the EfW facility was also explained together with the environmental and economic benefits this would bring. The newsletter also included a guide to the IPC and emphasised the importance of the role of consultation in the pre-application process.
- 8.6.4. Covanta intend to publish further Community Newsletters and the next edition is due for publication following validation of the IPC application.

8.7. The Health Impact Assessment

- 8.7.1. There is no statutory requirement to submit an HIA for the Project. However, PER feedback from NHS Bedford and the Health Protection Agency (HPA), suggested that such a study should be undertaken. This presented a change to their original advice but Covanta commissioned ERM to carry out an independent HIA.
- 8.7.2. The document "Rookery RRF Health Impact Assessment" (accompanying the DCO application) contains full details of the methodology, consultation, desk top study and findings of the HIA.
- 8.7.3. NHS Bedford was consulted upon the scope of the HIA and agreed the strategy. On 24 May 2010, the CLP were given a presentation about the HIA

process and invited to comment and suggest who should be invited to attend engagement events (see Chapter 6).

- 8.7.4. The stakeholder engagement programme was undertaken in May and June 2010 and was designed to gather information on local sensitivities and identify potential health effects of the proposed RRF that would not be apparent from the published literature or using scientific research.
- 8.7.5. The HIA used the same stakeholder footprint as had been used for other consultation activities, i.e. a 5km radius from the site, adjusted to cover whole parishes (see Figure 3.1). Key groups were identified as following:
- 1) regional groups;
 - 2) Central Bedfordshire Unitary Authority;
 - 3) Bedfordshire Borough Council;
 - 4) NHS Bedford;
 - 5) CLP;
 - 6) head/deputy head teachers;
 - 7) GPs;
 - 8) parish councillors;
 - 9) local action group representatives;
 - 10) local community group leaders or representatives (e.g. Women's Institute, youth groups); and
 - 11) members of the community (in particular those who had expressed concerns about health issues at previous events).
- 8.7.6. Following the CLP meeting on 24 May 2010 the first stakeholder event for local authority representatives, regional groups, the PCT, head/deputy head teachers and other professionals, was held on 25 May 2010 at the Forest Centre in Marston Moretaine at 1.30pm till 4.00pm. GPs and head/deputy head teachers were also invited to the open community workshops, given the difficulty they may have had attending this first event during office hours.
- 8.7.7. 24 people were invited and four attended. This level of attendance is not unusual for such events, given the time pressures experienced by many professionals. It is also possible that invitees had already responded to the

PER, or through other consultation activities, expressing their views on these issues.

- 8.7.8. Two open community based HIA events were organised. The first was held on 5 June from 1.30pm till 4.00pm at Stewartby Village Hall and the second on 8 June at 6.30pm till 9.00pm at the Forest Centre in Marston Moretaine. These events were targeted at local authorities, community groups, and individuals.
- 8.7.9. 97 people were invited. 14 attended the first event and 22 attended the second (a total of 36, over 1/3 of those invited).
- 8.7.10. The main issues that were raised at the events (professional and community) were:
- 8.7.11. **Emissions and air quality:** emissions from the stack including nano particles and dioxins, pollutants entering the food chain as they fall on fields and gardens, traffic pollution, the cumulative effect of developments in the area and their combined impact on emissions;
- 8.7.12. **Road Traffic:** increased traffic volume on the A421 and other local roads, associated delays, associated increase in potential for accidents, associated increase in litter, associated increase in noise;
- 8.7.13. **Noise:** as a result of increased traffic, impacting residents' quality of life;
- 8.7.14. **Visual environment:** people felt the proposed building was ugly and that this, combined with the possibility of other developments such as a proposed wind farm, would have a negative impact on quality of life;
- 8.7.15. **Green Space and Recreation:** there was concern that the presence of the RRF (because of its visual impact and fears about emissions) would inhibit use of green space for recreation, affecting both residents and tourists;
- 8.7.16. **Employment:** the Project would create employment, both directly and indirectly. People felt that the jobs created would be either manual or specialist and would therefore not go to members of the local community. This did not cause concern because there are currently few local jobs available in the area anyway and many local people commute to work further afield;
- 8.7.17. **Trust:** one of the major issues raised by stakeholders at all the events was their lack of trust in Covanta (because of perceived poor health and safety

records and breaches of emission standards in the US) and the EA (based on local experiences from when the brick works and Brogborough landfill were operational). Stakeholders were concerned that the EA will be responsible for monitoring emissions from the RRF. People were also mistrustful of the current scientific understanding of how emissions may affect human health.

8.7.18. **Further issues:** other key issues identified by stakeholders included: being unable to sell their homes; odour; health impacts of the fly ash; accepting waste from other counties; development of mental and physiological health problems; anxiety that waste may come from even further afield in the future or different types of waste be incinerated; consideration that the Community Fund is a 'bribe' and that the discounted electricity is an 'insult'; that people will no longer use the Forest Centre as the Trust is perceived as being in Covanta's 'pocket'.

8.7.19. The HIA examined current scientific literature on the issues raised and refers to the Environmental Statement (ES) for baseline and projected information relating to these issues and the Project. In summarising the actual effects of the Project, and in referring to the ES, the HIA found that:

Any measureable effects on health as a result of changes to the physical environment (e.g. changes in air quality or the noise climate) are not expected to occur as a result of the proposed RRF.... This conclusion is contrary to the expectations of the local community, for whom such effects represent a prominent anxiety. Some means of addressing these concerns will be required if and when the development proceeds.

8.7.20. The HIA lists a number of measures to maximise benefits and minimise adverse effects which include:

General

8.7.21. Ensure that tree planting is carried out in such a way as to achieve the maximum and the earliest screening when the RRF is viewed from nearby green space.

8.7.22. Ensure open communication and sharing of information, including:

- 1) the display of emissions data on the website and in the visitors centre, in a form that is accessible and as close to real time as possible;
- 2) the provision of information on Covanta's operations and issues globally (notably in the USA);

- 3) the production and distribution of regular newsletters describing project progress, highlights, emissions data and any formal breaches of permit etc;
- 4) a demonstration that the processes and procedures for dealing with bottom ash and fly ash cannot result in harm, even in the event of road traffic accidents;
- 5) provide transparency around the methodology used to develop community benefits programmes;
- 6) establish a community complaints procedure in addition to the retention of the Community Liaison Panel; and
- 7) communicate the plans for responding to accidents within the Operations Area, as contained in the Environmental Permit application for example.

Construction Recommendations

8.7.23. The following measures specific to construction should be adopted:

- 1) ensure contractors are signed up to the Considerate Constructors Scheme (and that they operate best practice in this regard);
- 2) communicate information regarding construction activities throughout the construction period to the most local communities; and
- 3) ensure that the construction site area is secure and not vulnerable to trespass.

Operation Recommendations

8.7.24. The following measures specific to operation should be adopted throughout the lifetime of the facility:

- 1) implementation of effective maintenance and upgrading of facility as appropriate, including fitting of best practice technology when available, as directed by the EA as part of the Environmental Permit review; and
- 2) appropriate and sensible procedures should be put in place to prevent inappropriate waste being put in the furnace and these procedures should be explained to the CLP.

Covanta's Response to the HIA Recommendations

8.7.25. Covanta's response to the HIA recommendations is appended to the HIA, and, in summary, provides for:

- 1) tree planting as recommended;
- 2) display of emissions data in the visitor centre/educational facility in the EfW Facility and, if desired, at other public buildings. It will also be accessible on Covanta's website in terms easily understood by the general public. Covanta will work with the CLP to agree the most appropriate format;
- 3) continuing access to information on Covanta's operations and issues globally via the company's website;
- 4) a continuing programme of information dissemination throughout the planning, construction and operational phases of the Project's life to describe progress, highlights, emissions data etc;
- 5) demonstration that the process and procedures for dealing with bottom ash and fly ash cannot result in harm, even in the event of road traffic accidents. Information on this is already available on Covanta's website via notes and a presentation for the CLP meeting 11, at which this issue was discussed. Covanta has offered to provide further information on this subject on request if it would be helpful;
- 6) a clear and transparent explanation of the methodology used to develop community benefit programmes;
- 7) establishment of a community complaints procedure: there is already a procedure in place and further information about this will be made available to the CLP and wider public;
- 8) communication of the Emergency Plan for responding to accidents within the Operations Area. This plan will be developed with the CLP, emergency services and local authorities and will be shared with employees, subcontractors, visitors and the local community;
- 9) registration of the Rookery South site with the Considerate Contractors Scheme, ensuring that all contractors who work on the site observe the Scheme's code;
- 10) communication of information regarding construction activities throughout the construction period to local communities through the Covanta Rookery web pages and a dedicated telephone information line. Updates will also be provided to Parish Councils, the local media and the CLP, and at the site entrance;

- 11) ensuring that the construction site area is secure and not vulnerable to trespass by employing a site security contractor who will undertake duties in accordance with a construction security plan;
- 12) implementation of effective maintenance and upgrading of the facility as appropriate and as directed by the EA; and
- 13) adoption of procedures to prevent inappropriate waste being put into the furnace and explanation of these to the CLP. Such procedures would include: paperwork checks for each delivery; random inspections of loads of vehicles entering the tipping hall; inspection of waste transfer notes for commercial and industrial waste: unacceptable waste, or waste not matching the transfer note, will be rejected; and installation of radioactive detectors near weighbridges within the Operations Area.

8.8. Technical and Statutory Consultation

- 8.8.1. Below are summaries of the meetings held and significant correspondence describing this consultation during spring and summer 2010. The meetings tracker in Appendix 4 lists all meetings that took place.

Consultee	March 2010	April 2010	May 2010	June 2010	July 2010
Local Authorities	✓✓	✓✓	✓✓✓	✓✓	✓
English Heritage			✓		
Primary Care Trust	✓	✓			
Fire and Rescue Service		✓			
Anglian Water Services		✓			
EDF	✓				
Highways Agency	✓✓		✓		
Network Rail	✓	✓	✓		
CABE	✓				
Forest of Marston Vale		✓			
Potential Combined Heat and Power Users	✓ ✓				✓

Local Councils

- 8.8.2. Covanta and its planning representative met with officers of the Joint Minerals and Waste Planning Unit (JMWPU) on **30 March 2010, 23 April 2010, 11 May 2010, 11 June 2010 and 5 July 2010**. The issues discussed varied but in the main covered progress on the LLRS application, updates on public consultation (including the HIA), detailed design progress and drafts of IPC submission documents.

General

- 8.8.3. On **8 March 2010** Covanta and its landscape, architecture, planning and cultural heritage consultants met with CBC and BBC officers to outline the IPC process, consultations with EH and CABE, the Statement of Common Ground and the programme for the application. The council officers present confirmed that they had some working knowledge of the Project and Covanta's consultants offered to brief councillors at a later date if this would be helpful. The councils were directed to Covanta's website to view the material for the forthcoming exhibitions and were invited to those. Covanta's team summarised the recent CABE and EH feedback and listed the key cultural heritage assets for assessment that had been agreed with EH and the other key issues they had identified. The roles of the integration studies, CABE, EH and FMV in influencing the design of the building were explained and discussed. The relationship of the building with the Forest Centre and surrounding landscape was discussed. Covanta's landscape and design consultant described how the ongoing design development sought to minimise visual impact, including colour studies and lighting strategy. The landscape, rights of way and green infrastructure, and ecology strategies were also described. It was agreed that each council would have a separate SoCG and these would be agreed on a topic by topic basis. EH had requested their own separate SoCG for heritage matters. A separate landscape SoCG would be prepared.
- 8.8.4. Key feedback from consultees: sought clarity on relationship between capacity and scale of building.
- 8.8.5. Key response by Covanta: report to be prepared on capacity/scale and this would be forwarded to CBC and BBC when complete. Will issue minutes of EH meetings, will issue draft SoCGs in April

Landscape and design

- 8.8.6. Covanta's design consultants met CBC on **19 May 2010** to discuss the council's PER response and to provide an update on progress, to address some of those responses. The design process, through which the building form had changed significantly, was described. The development of the colour palette was also described. Consultation with FMV, and the influence of this on the design of the Project, was described. The need to agree a SoCG was also explained.
- 8.8.7. Key feedback from consultee: agreed that the design solution for the building was effective and appreciated the process as described. Confirmed that colour palette development was helpful, agreed that due consideration had been given to the 'recreational hub' of the Forest of Marston Vale, agreed that the revised LLRS as described sounded more acceptable than previously, agreed that due consideration had been given to the landscape strategy and that it included appropriate mitigation, were content that the lighting strategy sought to minimise lighting requirements and effects, will provide suggestions for additional night time photomontages.
- 8.8.8. Key response by Covanta: will issue CABA response to design, will issue Fichtner report on building size, will issue revised LLRS, will issue draft LVIA and draft SoCG.

Cultural Heritage

- 8.8.9. On **3 June 2010** Covanta's cultural heritage consultant met CBC to summarise recent progress in the Project and to discuss CBC's PER response in relation to cultural heritage and the SoCG. The night time view points for photomontages were described
- 8.8.10. Key feedback from consultee: are waiting for Fichtner report before issuing PER response
- 8.8.11. Key response by Covanta: will issue Fichtner report and draft Design and Access Statement, will issue example, draft SoCG and draft of Cultural Heritage section of ES.

EHOs

- 8.8.12. Covanta and its noise consultant met BBC and CBC EHOs on **13 April 2010**. The results of additional background noise surveys taken at Marston Moretaine and How End on 11 and 12 March 2010 were issued to the EHOs prior to this meeting. The baseline survey methodology and results were discussed, as were projected noise level calculation methodologies. Applicable planning policy and British Standards were also discussed.
- 8.8.13. Key feedback from consultees: accept background survey was carried out correctly and in appropriate locations and is therefore an appropriate basis for impact assessment. Agreed that PPG24 is the applicable planning policy guidance and that BS 4142 should be used for plant noise assessment and BS 5228 should be used for construction noise assessment. Agreed that Covanta's adopted calculation methodologies were acceptable. Do not agree fully on interpretation of BS 4142. A site visit to an operational facility would help the EHOs understand the potential tonality of the proposed plant noise. Will provide council policies on noise.
- 8.8.14. Key response by Covanta: will provide further information on plant noise assumptions used for modelling (done 5 May); will arrange a site visit to a suitable operational plant. This visit occurred on 26 May 2010. On 4 May Covanta provided clarity on the development of noise mitigation to CBC and BBC.
- 8.8.15. On **26 May 2010** the EHOs for CBC and BBC visited Spalding Power Station to assess the tonal noise of the air cooled condensers (ACCs, which are similar to those proposed at the RRF). It was agreed at this visit that the noise was not tonal and would not attract a +5 dB penalty when calculating the rating noise for the RRF. This was subsequently confirmed in emails by BBC 9 June 2010 and by CBC on 14 June 2010, which responded to Covanta's draft SoCG in relation to noise issued on 28 May 2010.
- 8.8.16. Key feedback from consultee: the noise from the ACCs is not tonal and would not attract a +5 dB penalty when calculating the rating noise for the RRF.
- 8.8.17. Key response by Covanta: will absorb into SoCG.

Kempston Town Council

- 8.8.18. On **9 July 2010** Covanta met Kempston Town Council members to discuss the Project. The council members had issued a list of questions to Covanta in advance. The questions related to: volume of vehicles, routes and frequency; catchment area; hours of operation; Covanta's facilities in the USA; light pollution; and ash from the incinerator process. Covanta provided nominal and maximum vehicle movements and when these would occur, the type of vehicle that would carry waste and explained that, as a result of the detailed rail feasibility report produced by Arup, rail transfer of waste would not be included in the application, although it had not been ruled out in the future. Covanta confirmed the operating hours and delivery hours, and provided literature about its US facilities for distribution to other council members. Covanta described how the lighting strategy had been developed to minimise light pollution and confirmed that the access road would not be lit at night. Covanta described how the incinerator bottom ash would be processed into construction aggregate on site and finally the benefits of the Project for the local community, should it be permitted. Covanta provided the councillors with copies of the June 2010 newsletter.

English Heritage

- 8.8.19. On **7 May 2010** Covanta's design and cultural heritage consultants met EH to review the EH PER response and IPC scoping opinion; discussed methodology in light of the recently issued PPS5 (which replaced PPG15) and assessment of impacts in order to settle the basis of the SoCG. Night time montages and the engineering report relating to operational design were also discussed. Covanta's design consultant explained the constraints to lowering the building further into the ground and described how the design development of the building (e.g. colour studies, orientation) had embodied additional mitigation measures. Night time photomontages and the lighting strategy were discussed and the view from Ampthill Park agreed as appropriate to demonstrate the worst case scenario. Methodology was discussed, including factors contributing to the sensitivity of an asset. The content of the Fichtner report was outlined. The timetable for production of the SoCG was discussed, with the target being mid-June. The Nirah building and its visual relationship to the EfW project was discussed: it was agreed that in some views, the former would be more prominent than the latter.

- 8.8.20. Key feedback from consultee: design development had minimised impacts but the building remained a large structure. The proposed EfW may be perceived by locals as replacing Cardington Hangars as the largest structure in the area, although the setting of the Hangars was not compromised by the EfW. Suggested that a commentary to the montages would be helpful for the IPC commissioner. Assessment methodology to be revised. Accepted that the design approach was correct in that the visual impact had been minimised and associated activity would be screened.
- 8.8.21. Key response by Covanta: will issue revised version of the PER content relating to methodology to EH for agreement. Will issue Fichtner report on completion. Will issue draft SoCG headings

NHS Bedford

- 8.8.22. A meeting was held with NHS Bedford on **4 March 2010** to discuss its response to the IPC, as included in the IPC Scoping Opinion of April 2010.
- 8.8.23. Key feedback from consultee: now requires a Health Impact Assessment (HIA) to be submitted with the application. The representative indicated that she would like the following impacts included: transport, visual, socio-economic, community identity, health inequalities, potential odour escape, accidents and air emissions.
- 8.8.24. Key response by Covanta: will consider this requirement.
- 8.8.25. On **16 April 2010** another meeting was held to agree the HIA scope, with emphasis on stakeholder engagement. NHS Bedford agreed with the stakeholder engagement plan, which included workshops with both the open community and health professionals, agreed that there is already in existence material to inform the HIA including captured consultation responses and quantitative air emission assessments, that positive as well as negative health impacts would be assessed, that an attempt at a qualitative assessment of the impact of visual changes should be made.
- 8.8.26. Key feedback from consultees: agreed with stakeholder engagement plan, and scope of HIA.
- 8.8.27. Key response by Covanta: will proceed with stakeholder events.

Bedfordshire and Luton Fire and Rescue Service

- 8.8.28. After receiving the emergency access risk assessment from Covanta, BLFRS responded by letter on **22 April 2010**.
- 8.8.29. Key feedback from consultee: do not require a second access to the site, and would not be objecting at the planning phase of the Project
- 8.8.30. Key response by Covanta: will not include secondary access in design.

Anglian Water Services (AWS)

- 8.8.31. On **28 April 2010** Covanta's consultants met AWS to discuss flow rate requirements for potable water. The projected water requirements for the EfW had fallen to 2l/s (from 4l/s) and both parties agreed that it would be preferable to avoid any off site work to enable a supply from Ampthill Reservoir.
- 8.8.32. Key feedback from consultee: will investigate whether there is up to 2l/s currently available locally
- 8.8.33. Key response by Covanta: are considering potable water only for domestic use and fire-fighting. Other water requirements may be met by on-site rainwater harvesting and recycling.
- 8.8.34. On **18 May 2010** Covanta's consultants met the local AWS catchment scientist to discuss TE discharge requirements for the Project, specifically the ash yard and water collection lagoon within the MRF. Covanta's consultant went through the history of consultation with AWS in relation to TE from the Project. It had been Covanta's understanding, from discussions with AWS, that there was spare capacity in the Stewartby sewerage treatment works of up to 10l/s and AWS had therefore agreed that foul water could be pumped to the existing public foul sewer. The development of 710 homes and 3 hectares of employment land at Stewartby, approved in outline, was discussed in relation to the capacity issues at the Stewartby works. AWS would need to address this.
- 8.8.35. Key feedback from consultee: the Stewartby works do not have the capacity to accept any more than domestic flows from the Project and previous advice from AWS was erroneous. Run off from the MRF, after suspended solids had settled out as proposed, would be classified as 'clean' TE based on information supplied by Ballast Phoenix (the contractor who would operate the MRF). This

could be discharged to the foul sewer without concern. The operator of the MRF would have to apply for a TE consent in their own name from AWS. Will advise as to strategy for Stewartby works.

- 8.8.36. Key response by Covanta: need to know of AWS strategy for works in order to progress design (size) of settlement lagoon.
- 8.8.37. Covanta wrote to AWS on 10 June 2010 and received a response letter on **21 June 2010**. AWS stated that there were public water mains in the road relating to the proposed route and that no development is allowed over such a main. An application to divert the main would be required if it was not possible to avoid the main.

EDF Energy

- 8.8.38. On **29 March 2010** Covanta and its engineering consultant met EDF. EDF's indicative offer letter dated 02 March 2010 for the generation export and import arrangements was discussed along with Covanta's response letter dated 10 March. Risks associated with the identified connection points, cabling routes, network layout and detailed design of the sub station were also discussed. The possibility of hot water pipes for the district heating system being required was raised. Covanta stated that the maximum exported generation would be 60MW.
- 8.8.39. Key feedback from consultee: will issue typical substation building layouts, provisional offer and connection agreement, provisional programme to deliver.
- 8.8.40. Key response by Covanta: will issue confirmation of loads, layout for substation, Network Rail contact details and meeting notes, proposed access road layout and section, letter requesting provisional price and connection agreement for 60MW export.

Highways Agency

- 8.8.41. A baseline Traffic Assessment (TA) was issued to the HA, CBC and BBC on **11 March 2010**. In April 2010 responses were received from the HA and CBC. In summary, these authorities required additional details about the baseline traffic assessment, an assessment of the A421/Marsh Leys junction to be included, the effect of different sources of material on traffic assignment, and

consideration of routes other than the strategic highway network. Covanta's consultants added this information to the revised TA.

- 8.8.42. On **29 March 2010** a draft Travel Plan was issued to the three authorities for comment, and responses were received from the HA, on 4 May, CBC on 30 April and BBC on 2 June 2010, with detailed comments. These comments were taken into account whilst revising the Travel Plan document.
- 8.8.43. The second draft Travel Plan was issued to the three authorities on **21 May 2010** for comment. Feed back was received from all parties and amendments were undertaken to produce a final Travel Plan, which will be submitted with the DCO application to the IPC.

Network Rail

- 8.8.44. On **10 March 2010** Covanta, its rail consultant and Freightliner (Covanta's rail freight partner) met Network Rail for an initial meeting to discuss the Jacobs Rail Study Review (a Buckinghamshire County Council commissioned report on potential sites for rail transfer of waste). Inclusion and assessment of these sites was required in Covanta's Rail Feasibility Study (RFS), which forms part of the IPC submission. The nine sites shortlisted by Buckinghamshire were reviewed and issues associated with each site discussed.
- 8.8.45. Key feedback from consultee: Covanta to confirm inclusion of nine sites discussed in RFS, requested meeting to discuss and review revised RFS.
- 8.8.46. Key response by Covanta: will include sites in report, will arrange meeting to review.
- 8.8.47. On **6 April 2010** Covanta and members of its team as above met again with Network Rail to review the revised RFS. The document was discussed.
- 8.8.48. Key feedback from consultee: further revisions suggested.
- 8.8.49. Key response by Covanta: further revisions made, document reissued. The final agreed RFS is included in the submission documents.
- 8.8.50. On **28 May 2010** Covanta, its rail, transport and design consultants met Network Rail to discuss and agree the scope of the information and the process required to secure relevant permissions and delivery of an acceptable level crossing resolution at Green Lane. The traffic modelling used to inform

NR's safety audit was discussed. Alterations to the railway station and improvements to footpath/cycle links to the Country Park as a concept, but not a requirement, were discussed. Extinguishment of FP4 was discussed.

- 8.8.51. Key feedback from consultee: approval of a scheme usually takes about 2 years from initial discussions. Consultees would include HSE, Highway Authority and Parishes. Confirmed that a bridge had not been raised as a possible solution to the risk analysis carried out previously by NR, level crossing upgrade with widened footpath to the south was the likely solution, such a proposal had been put to the NR Board recently and feedback would be passed on. The RFS should include assessment of a bridge option to scope it out of the Project. Extinguishment of FP4 would be beneficial and reduce risk. Requested proposed junction lighting scheme. Confirmed that it had discussed creation of ducts underneath the line in principle with EDF: directional drilling would be carried out on a Sunday.
- 8.8.52. Key response by Covanta: will provide information to NR including traffic data update, signage and full barrier design, information on Rail Trust proposals for Stewartby, bridge crossing scoping out report, sketch design for rail station (southbound only), rights of way requirements, details of extinguishment of FP4, lighting proposals, confirmation of programme.

Commission for Architecture and the Built Environment (CABE)

- 8.8.53. 'Information for 2nd Design Review' was issued to CABE on 4 March 2010. This reflected the scheme as revised following CABE's earlier feedback and a response to this was received on **22 March 2010** (see Appendix 56).
- 8.8.54. Key feedback from consultee: commended the balanced composition of rectangular volumes, highlighting that the composition of smaller and taller building parts is successful. The response also noted that more testing was required to the colours and finishes of the building envelope.
- 8.8.55. Key response by Covanta: further colour studies undertaken.

Marston Vale Trust (MVT)

- 8.8.56. On **23 April 2010** Covanta and relevant members of their team met with the MVT to discuss issues related to the proposed improvements to access and in particular the northern access to the country park. Various options were

discussed, and it was agreed that consideration would be given to the feasibility of an underpass option. A further commitment was given for members of the Covanta team to visit the country park to agree the extents of new planting to redirect views. A provisional agreement was made to undertake a partner donation of £20,000 per year and that it was anticipated that the money would be used for boardwalk construction and wetland enhancement. The MVT highlighted an emerging shortfall in targets for woodland planting and that the MVT was keen to see the Project champion the increase in the woodland cover figure from 30% to 39%.

- 8.8.57. Key feedback from consultee: requested that further consideration, including costing, be given to underpass option due to its inherent safety advantages.
- 8.8.58. Key response by Covanta: will meet on site to agree extents of new planting in the Country Park to redirect views away from the EfW building. Provisionally agree to contribution of £20,000 per annum until completion of construction phase of Project. Agreed to pay MVT electricity costs (approximately £10,000 per annum) recognising impacts of the Project and its energy generation synergies.

Potential Combined Heat and Power Users

- 8.8.59. Covanta met Gallagher's, the developer for the Wixams project, on **5 and 29 March 2010** and Hanson/Arnold White Estates on **7 July 2010** to continue discussions about providing CHP. At this point, the Core CHP Scheme can be defined as Nirah, Wixams and Marston Moretaine. The other potential users consulted have not been discounted.

8.9. Further Landowner Consultation

- 8.9.1. Following completion of the Landowner Consultation that is described in section 7.5 of this Report and the technical consultation reported in this section of the Consultation Report, further Landowner Consultation was undertaken, as well as some additional technical consultation. The reason for this additional exercise was twofold:
- 1) discussions with EDF revealed a need for a change to the grid connection route. This is because EDF and Covanta now intend that the 33KV grid connection for the Project will be to EDF's new Marston Grid Substation instead of Marston Road Primary Substation; and

2) discussions with Network Rail resulted in a proposal to upgrade the Green Lane Level Crossing. Design development resulted in the conclusion that additional land would be needed north of the level crossing.

8.9.2. As a result of the Grid connection changes to the Project the landowners and statutory consultees listed at Appendix 58 were consulted in respect of the changed proposals. No additional consultation responses were received.

8.9.3. As a result of the changes to Green Lane Level Crossing, London Midland Trains was consulted in addition to Network Rail, with whom formal and informal consultation was underway. A copy of the statutory consultation letter sent to London Midland Trains is at Appendix 59. That company has confirmed that it does not require the full 28 day period for its response and has agreed to enter into discussions with Covanta.

8.9.4. As a result of these two additional statutory consultation exercises, no changes have been made to the Project. However, discussions with a number of prospectively affected parties has been facilitated.

8.10. Conclusion

Summary of consultation impacts on design Spring/Summer 2010

8.10.1. From the feedback received from consultees during this period, the main points to be addressed are summarised below by reference to the relevant environmental issues.

Issue	Consultation Result
Visual/landscape	Further consideration of the building and stack colours; refinement of the landscape strategy; tree planting in Country Park to be agreed on site
Rights of Way	Finalising of the rights of way strategy; omission of the consideration of an over bridge for pedestrians and cyclists; underpass to northern end of Country Park to be considered
Safety considerations	No alternative emergency access required

Issue	Consultation Result
Utilities	No upgrading of potable water supply required TE will require license and foul system to be upgraded
Transport	Travel Plan agreed
Health	HIA required
CHP	3 potential users identified as forming core strategy

8.11. Ongoing Consultation

8.11.1. The consultation on the PER provided a lot of feedback which had been based on the scheme design reached in February 2010. Considerable design refinement had been ongoing throughout the consultation period as part of the normal design process prior to an application submission. It was considered appropriate to meet key statutory consultees and bring them up to date with the more developed design and illustrative material prior to drafting Statements of Common Ground. Meetings were organised with key consultees to explain the design development and advise on the feedback received as part of the consultation that would and had informed the design. This process permitted certain aspects of the consultee PER responses to be addressed including clarification of certain points or facts, concerns relating to design response through the demonstration of further design development since February 2010 as well as the provision of information to form a sound basis for the Statements of Common Ground.

8.12. Statements of Common Ground

8.12.1. During late spring and into June and July 2010 the design and technical team continued to prepare Statements of Common Ground with key statutory consultees on key topics. The Statements were either made jointly or singly subject to the agreement with the topic consultees.

9.0 Conclusion

9.1. Introduction and Overview

- 9.1.1. Pre application consultation identifies early consultation with the public, local authorities and key public bodies as critical. This report records a full and detailed consultation process with those consultees which commenced in November 2008 well before the commencement of the design process, and which has continued with consistent intensity throughout the Project programme in respect of the RRF.
- 9.1.2. The need to achieve a range of outcomes is identified in guidance from involving local people and gaining their views, to identifying particular social, economic and environmental impacts. This report records the process of achieving that range of outcomes referring to consultation with the community, in firstly providing them with relevant information to inform their understanding and secondly to gain their views based on that information to inform the design of the Project and understand areas of concern they may have. In addition this report also records consultation with the statutory and technical consultees relating to impacts and receipt of technical advice and comment to inform the design and assessment process.
- 9.1.3. In preparing for consultation it is clearly important that the nature and extent of the communities who may be affected is understood and that this informs the strategy and the scale of the consultation 'footprint'. To that end the consultation strategy was discussed and agreed with CBC and BBC and an informed judgement made on the extent of influence of the project and therefore those that would reasonably expect to be consulted. Covanta consider that the consultation has addressed the correct audiences and to the correct level of detail.

9.2. Compliance with Statutory Requirements

- 9.2.1. For ease of reference, the following table identifies where all the consultation requirements set out in the PA 2008 are addressed within this Report.

PA 2008 Requirement	Reference within this Report
Section 42(a)	7.1 and 8.2
Section 42(b)	7.1 and 8.2
Section 42(c)	Not Applicable
Section 42(d)	7.5, 8.2 and 8.9
Section 43	See section 42(b)
Section 44	See section 42(d)
Section 45	8.2
Section 46	7.3
Section 47(1)	7.2
Section 47(2)	7.2.3 - 7.2.4
Section 47(5)	7.2.5
Section 47(6)	7.2.7
Section 47(7)	7.2.10
Section 48	7.2.9
Section 49	7.5, 7.6, 7.7, 8.2, 8.3, 8.4, 8.7, 8.8, 9.7

9.3. The Principles and Responses

9.3.1. The Guidance identified in section 3.2 outlines the benefits of pre-application consultation. These are listed below, outlining in brief how the consultation process has delivered these benefits:

- 1) Allow feedback on potential options. The consultation has provided opportunities to comment on alternative aspects of design during the public exhibitions and during the CLP sessions. In addition a full explanation of the alternative site assessment which is submitted as part of the application has also been provided.
- 2) Help local people to understand better what a particular project means for them so that concerns resulting from misunderstandings are resolved early. The consultation has sought to ensure that there should be no surprises following the submission to the IPC. The consultation process has been iterative and staged in a manner that has followed the design development

and assessment process to build understanding and seek feedback as the project design and operation has settled.

- 3) To obtain information about economic, social and environmental impacts. Consultation with statutory and technical consultees has provided key information to inform an understanding of the baseline context of the site and subsequently informed the assessment of effects recorded in the ES which is submitted in support of the application.
- 4) To enable potential mitigation measures to be considered and in some cases built into the project. As views from all consultees have been received they have been analysed and fed into the Project design and operation. Mitigation has been built into the Project to mitigate effects and this is recorded in full in the ES.
- 5) Identify ways in which the project could support wider strategic or local objectives. The process of consultation has informed the consideration of wider and local objectives. A series of objectives has been identified that form part of the application and are recorded in the DCO and other documents. Support includes the extension and enhancement of rights of way underpinned by Green Infrastructure objectives within local planning policy, the provision of a new entrance to the Millennium Country Park off Green Lane identified during consultation with Marston Vale Trust, the establishment of a community trust to help support local projects which will be administered by an independent organisation funded by Covanta and support to the reduction in fuel poverty through discounted electricity offer to the local area.
- 6) Guidance notes that effective pre application consultation will lead to applications that are better developed and in which important issues have been articulated and considered as far as possible. It has been Covanta's aim to ensure that submission to the IPC represents the best project outcome possible with as much clarity and certainty as possible relating to design resolution and assessment of effects. In addition the drive for a design of the RRF that is appropriate and of merit has been an important consideration and has been recognised in a positive final consultation response from CAGE following extensive design development.

9.3.2. In addition to compliance with these objectives, Covanta set out six key principles of consultation comprising:

- 1) using participative methods and making participation and involvement as easy and inclusive as possible;
- 2) applying the decision principle; making sure that the exercise will inform and influence decisions to be made;
- 3) clear feedback should be given to consultees on how their views were taken into account;
- 4) front-loading consultation is necessary i.e. engaging with the local community before the application for a DCO is submitted to the IPC;
- 5) considering the most appropriate and productive methods of consultation; and
- 6) regarding consultation as a meaningful process rather than a box-ticking exercise.

9.3.3. The CLG guidance notes that consultation will also benefit communities, enabling active involvement in shaping proposals where their views can influence the final application and that the consultation should be proportionate. There is a reasonable expectation that the 'views and impacts identified through the consultation can and should influence the final application' [para 87 of CLG doc] .Covanta considers that the consultation process has been proportionate and that it has led to meaningful impacts on the final submission. These meaningful impacts are summarised under seven main theme headings in section 9.7 below.

9.4. The Community

- 9.4.1. It is important that the communities that may be affected, know what is being consulted on and, as the Project moves through design development and technical resolution, that it is clear what is fixed and what remains unfixed so the expectations of consultees can be properly managed. The consultation has always been clear on what the Project is that is being consulted upon, and at every stage of consultation with the public, Covanta have advised the public on the stage it has reached, the level of detail and the forward programme so there is certainty about other opportunities to comment as they may see fit.
- 9.4.2. Community consultation has included public exhibitions and the provision of feedback forms, the establishment of the CLP, an active and managed website and the widespread mailing of regular updates.

- 9.4.3. As the consultation process has progressed the unfixed matters have generally lessened in number, with many having become fixed both in terms of design and understanding the impacts. This has not meant however that consultation on the remaining unfixed elements or impacts to be assessed is any less important. Feedback on stack treatment is a clear example of this.
- 9.4.4. An important indicator of successful consultation is the scale of feedback and attendance at events and that local people have taken the opportunities arising from consultation to comment. This report records the extent of response which Covanta considers to be representative and of an appropriate/ proportionate scale.
- 9.4.5. Guidance refers to the importance of ongoing engagement and Covanta is committed to ongoing support for a properly structured Community Liaison Panel who will remain an important link with the local community and conduit for information.

9.5. Technical Consultees and Statutory Consultees

- 9.5.1. A key aspect of the consultation with technical and statutory consultees has been the exchange of sufficient detail to inform Covanta's design and assessment work but also the advice from and consideration of effects by the consultees themselves. The report records this exchange, which has included a significant number of meetings, documents and information exchange and in many cases has led to the provision of Statements of Common Ground to be submitted to the IPC as part of the application process. These statements and in some instances letters, clearly identify where agreement has been reached on methodology, recording of effects and where any areas of disagreement exist. In addition, correspondence also records technical approvals or matters of compliance achieved and, where a commitment to the ongoing design process is provided, with an acknowledgement of work undertaken to the appropriate stage so far.
- 9.5.2. Of particular note has been consultation with English Heritage, Marston Vale Trust, CBC and CABE in relation to the design of the Project and consideration of its setting. Of note in relation to technical matters has been dialogue with the highways departments, Network Rail, Anglian Water and EDF, all of which are recorded in this report.

- 9.5.3. Statements of Common Ground are to be provided as part of the submissions to the IPC on a number of topics including:

Transport
Noise
Air Quality
Landscape and Visual
Cultural Heritage
Ecology
Planning

9.6. Those with Interests in the Land

- 9.6.1. The final area of consultation has been with those with interests in the land encompassed by the application area boundary or who could be affected by the proposals in such a way that they may be able to make a claim for compensation. The process of consultation and notification has been undertaken and recorded. The process of issuing land plans based on the known extent of works to permit an understanding of its effects has been pursued.

9.7. Consultation Outcomes

Design

- 9.7.1. The design of the Project has been shaped by the extensive consultation leading to a refined masterplan layout, landscape strategy and building design proposal. Comments during consultation have sought clarity on why a boxy building form has been developed with some respondents favouring a more curved building. An important part of the consultation has been the communication of the reasons for the building form, reducing building mass and height as well as developing a well considered design that responds to the various viewing audiences, permitting colour and shadow to be employed to assist with integration. The final design has been well received by the Commission for Architecture and the Built Environment (CABE) and the landscape strategy follows an approach supported in principle by Central Bedfordshire Council (CBC) landscape officers and the Marston Vale Trust.
- 9.7.2. The Landscape Strategy for the Project has been driven by the consideration of views from the elevated Greensand Ridge, from sensitive recreation and

cultural heritage assets and views within the Marston Vale from settlements and the adjoining Country Park. The need to screen the operational floor and minimise visual clutter has been recognised and extensive bunding and planting proposed to provide low level containment which has been tested through 3D computer modelling, demonstrated at public exhibitions.

- 9.7.3. Concerns about the extent of lighting for the Project were expressed. The control of lighting impacts has been addressed through the commitment to a carefully considered lighting strategy that provides lighting which has been subject to assessment. Montages of the Project during daylight hours and the hours of darkness have been prepared to inform design development and understanding and a more detailed lighting layout provided as part of the application.

The Environment

Landscape

- 9.7.4. Concern has been consistently expressed on the scale of the EfW Facility and its effect on the local landscape. This has driven the design and mitigation strategy but also the provision of information including photomontages such that the scale of the buildings in the landscape can be accurately understood and how the design responds to this matter. The retention of existing tree cover in the immediate proximity of Rookery South Pit has been secured to assist with long term screening and integration, especially in views from Stewartby and Marston Vale Trust and specific design integration in views from the Forest Centre. The land required to secure long term woodland screening has been expanded and secured through landowner consultation.

Cultural Heritage

- 9.7.5. Consultation has focussed on assessing the impacts on all known heritage assets and narrowing the field of detailed analysis to those assets that are considered to be most affected. 'Proving the negative' (i.e. that the Project is either not visible or not of such significance to warrant concern or further analysis) in a number of historic setting scenarios has been as important as has understanding what is visible and how that affects the value of the asset. Mitigation and integration of the Project have been important matters to progress but also ensuring the scale of the building is justified through rigorous design review (both operational requirements and architectural form). This

addresses the frequently asked question: 'If this is what is required to perform the function, is it as small as it could be?'. Specific reviews of the effect on the setting of Ampthill Park House, Ampthill Park and Houghton House have driven design resolution and refinement in conjunction with wider visual issues relating to nearby settlement and recreation/amenity areas. Consultation led to detailed consideration of the plume from the EfW Facility being modelled and considered as part of cultural heritage and visual impacts.

Noise

- 9.7.6. Consultation has determined the most appropriate method of assessing changes in the noise character of the area that may result from the Project with the assessment providing a clear indication of likely noise levels from key areas. Consideration of noise has influenced the layout of the RRF by moving certain operations or portions of the RRF buildings that are sources of noise further from the closest receptors, to locations where noise can be better screened. The general orientation of the main Energy from Waste (EfW) building and the location of openings in its envelope, as well as the detailed design of the buildings and the materials to be used, have also been influenced as a result of the consideration of noise. An arranged site visit to a power station, with similar characteristics to the Project, with the Council's Environmental Health Officers also assisted greater understanding as to noise stemming from particular pieces of plant.

Odour, Air Quality and Stack

- 9.7.7. The legacy of the Stewartby brickworks, and the related air quality and odour issues, has been an important point of reference during consultation as well as the explanation of what the EfW and Materials Recovery Facility (MRF) processes produce. The consultation has sought to provide clear and concise information on the EfW and MRF process. It addressed how the Project will comply with environmental regulation and addressed concerns expressed in respect of emissions and their effects both on human health and on protected habitats. The design of the stack of the EfW Facility has been given extensive consideration with height limits imposed by the movement of air traffic balanced with required emissions dispersal heights. The stack has been deliberately designed to appear familiar in colour and proportion to the brick stacks.

Traffic

- 9.7.8. Consultation raised several important areas of concern in relation to traffic including: out of normal working hours traffic movement, the 24 hour, 7 days a week nature of the EfW operation; association with the legacy of the movement of waste associated with landfill and the potential ongoing blight on the local highways of waste vehicles and litter; the consideration of a rail connection for waste deliveries; and the consideration of the design of a new site access and its association with the Green Lane level crossing. Information and analysis have been provided throughout the consultation process to inform consultees on these matters. The routing of traffic has been considered and clarity of predicted operational traffic movements provided including the type of vehicles predicted to visit the site so the public and consultees understand what the real effects will be. An undertaking to control the containment of waste arriving on vehicles has been made and a new site access junction designed that does not adversely affect the setting of Stewartby. A need for upgrade of the Green Lane level crossing has been considered likely by Network Rail during consultation and powers sought as part of the application. Connection of the RRF to the rail network has been considered and whilst it does not presently form part of the application, the RRF has been future proofed to allow for rail connection at a future date.

Ecology

- 9.7.9. The Project results in limited effects on ecology and much of the consultation process has related to clarifying the coordination of the RRF programme with that of the Low Level Restoration Scheme (LLRS) that is to be undertaken at The Rookery. The Project provides ecological enhancement through the provision of brown roofs and green walls and an extended wetland margin to the attenuation pond proposed under the LLRS. In addition, the inclusion of extensive woodland and tree cover, particularly at the periphery of The Rookery, will increase the extent of habitat that contributes to supporting key ecological receptors and, importantly, enhances the integrity and functionality of ecological links both within the Application Site and reaching out into the wider Marston Vale.

Public Health

- 9.7.10. The Health Impact Assessment (HIA) outlines a clear process for establishing the perceived health impacts arising from the Project profile through

consultation i.e. those aspects that may potentially influence health. The assessment considers the community profile, evidence base and the findings from consultation. The HIA has made a number of recommendations which have been considered and recorded within this report and signposts to other documents are provided where specific responses to recommendations are addressed.

Amenity and Recreation

- 9.7.11. Visual amenity and the effects of the Project on recreation were considered at an early stage. The consideration of potential improvements to the rights of way network, effects on the amenity of the rights of way network, public open space and the Millennium Country Park, as well as the effects on residential amenity, have all been considered during design development as well as within the Environmental Statement. The consultation process highlighted the concerns of local residents who were keen to understand what could be seen and from where in order to inform their understanding of the scale of the built elements within views and this was assisted by the provision of montages and a 3D computer model used at the second public exhibition.
- 9.7.12. Opportunities for enhancement to the rights of way network, connections across the site and with the Millennium Country Park have been developed as a result of consultation. Amenity considerations have driven the specific elevation and massing character of the western elevation of the EfW Facility in views from the Forest Centre and Marston Moretaine, introducing green walls and an irregular building silhouette. The integration of the RRF in views from Ampthill Park and Houghton House has been subject to extensive consultation and design development to keep the main EfW building below the horizon line, screen the operational floor from view and develop a regressive colour palette and a series of simple enclosing “shells” that are devoid of human scaled elements on the southern side to assist in reducing the perception of scale.
- 9.7.13. The general amenity of residents has been considered, addressing views from settlements, providing montages to demonstrate the effect on views and inform design development. The lighting strategy has been considered following consultation with a view to minimising the effects of lighting on amenity.

Sustainability and Climate Change

- 9.7.14. Sustainability objectives were set for the Project which have been recorded in the Design and Access Statement. The objectives have underpinned the direction of the Project and the rigour of operation and design of the Project. The objectives include: promotion of efficient use of energy, water and materials; reducing landfill and increasing waste recovery; promotion of health benefits; climate change mitigation and adaption; addressing impacts of development on habitats and species including protection from fragmentation of habitat; protection and enhancement of green infrastructure; protection and enhancement of historic assets; conservation and enhancement of landscapes; safeguarding air and water quality; promoting employment and reducing social exclusion; and moving people and goods sustainably. Each objective has a recorded outcome which has better informed an understanding of the Project during the consultation.
- 9.7.15. The most significant attribute of the Project is the efficiency with which it would generate electricity, out-performing most existing EfW Facilities in the UK using a selected technology and scaling it in the stream design such that it is efficient and also minimises the use of water.
- 9.7.16. EfW presents a less environmentally damaging process for dealing with selected waste than landfill which has characterised the landscape of the area since the clay pit closures, with just over 50% of the energy produced categorised as renewable.
- 9.7.17. The Project itself seeks to harvest water through the reprocessing of water used in the process through condensing water from the steam that drives the turbines which is re-introduced into the system, filtering water used for washing down aggregate in the MRF or collecting water from the roof of the EfW Facility. The use of a dry flue gas treatment system means that the process uses significantly less water than many existing EfW plants which use spray absorption systems. This is probably the single largest factor in the low water usage of the facility and is also a significant factor in the achievement of higher generation efficiency.
- 9.7.18. The Project has been designed having regard for future potential flood risk resulting from climate change.

- 9.7.19. The proposed lighting strategy seeks to minimise the use of lighting during the hours of darkness, providing key operational lighting at the Green Lane junction and within the Operations Area.
- 9.7.20. Whilst the Project is accessed by road, provision has been made in the site layout for potential future rail connection to the Marston Vale Line should waste in the catchment become capable of being delivered via the rail network. The site is also located close to a passenger rail line and local bus stop with a combined footpath and cycleway link to the east and west of the site entrance.
- 9.7.21. In addressing climate change the design has considered the potential effects on water use and alteration in climate that could affect planting and habitats. In all instances the strategy has been to provide a diverse and flexible design providing as much future proofing as possible.

Socio Economics

- 9.7.22. The socio economic effects of the Project have been raised during consultation and explored and addressed where possible as the Project has progressed. The main issues raised have related to the potential effects on house prices, the availability of discounted electricity, the nature of the effects on the Forest Centre, the local benefits achieved by the Project through direct funding of community initiatives and employment. The perception that the area is on the upturn and recovering from the legacy of the brickworks and landfill activities has been raised, with concerns that the Project reverses this trend.
- 9.7.23. Following consultation, a Community Trust Fund has been proposed together with an agreed funding stream for the Marston Vale Trust. The Community Liaison Panel (CLP) established as part of the consultation strategy, is proposed to be retained through the life of the Project to assist in the maintenance of good communication and dissemination of information.
- 9.7.24. The short term economic benefits of the construction project and promotion of local procurement have also been identified.
- 9.7.25. The visitor /education centre lies at the heart of the RRF and is intended to promote better understanding of the process, address concerns raised by the HIA about perceived health impacts and develop links with the Forest Centre and local tourism.

- 9.7.26. The context of the Application Site has been fully recognised and has underpinned the approach to the Project. The site context is subject to considerable change underpinned by planning policy with significant environmental, social and economic change. The design philosophy has been driven by the desire to develop a well designed series of buildings marking a positive sustainable future for the Marston Vale promoting the objectives of the vale.
- 9.7.27. The Project and the EfW building have been subject to considerable design development and review by CABE and other organisations and has been well received as a project of merit responding to its context.
- 9.7.28. The transport strategy for the Project has assessed the potential effect of increased traffic movements and no significant or unacceptable impact has been identified.
- 9.7.29. Stewartby is a settlement subject to future change with extensive new planned development including residential development and of the National Institute for Research of Aquatic Habitats (Nirah) project. The village is presently poorly connected to the Millennium Country Park which has an unremarkable boundary and links to Green Lane. The Project secures a new park entrance that positively links the village via Green Lane to the park.

Planning

- 9.7.30. The planning context of the site has been explained throughout the consultation process and this has been an important area of communication, setting the Project in its wider context and explaining the consideration of alternative sites. The area is subject to planned change that will see considerable change in the character of the area set within the Marston Vale forest. The Project will form part of the positive future of the vale.

9.8. Is There an Alternative?

- 9.8.1. As the consultation has progressed there has been some evidence of growing support for EfW generally as the nature of the operation and its regulatory framework have been understood but the location and scale of the Project has been questioned. An alternative site assessment has been prepared and has informed the consultation process demonstrating that Rookery South is an appropriate location at which to develop the RRF, which performs well against

the relevant criteria and offers some significant advantages, including: its ability to contribute to the built and green infrastructure sought within the Northern Marston Vale; that it is able to accommodate both the EfW Facility and the post treatment MRF; and that it is deliverable within a timeframe suitable to address the urgent need for renewable energy supply diversion from landfill, benefitting from a central position within the Study Area. In addition alternative building designs and site layouts have been explored and are recorded in the ES and Design and Access Statement submitted as part of the Development Consent Order application. These alternatives are not preferred as they do not perform as well environmentally.

9.9. Conclusion

- 9.9.1. The multi-stranded consultation approach adopted by Covanta has had a positive influence on the Project in many different respects, as summarised above. Covanta does not see this Consultation Report as the conclusion of the consultation process but merely a snapshot. Ongoing technical consultation is both inevitable and desirable, and ongoing relationship building and information exchange with the local community key as a potential new neighbour. The latter has been underpinned by the operation of the CLP to date and a separate report prepared by the independent facilitator outlines its impact and progress.