

Environment Agency
Permitting and Support Centre
Land Team
Quadrant 2
99 Parkway Avenue
Sheffield
S9 4WF

29 October 2017

Dear Sir/ Madam,

Re: Environmental Permit Application: EPR/WP3234DY/A001 Rookey Pit (Stewartby Bedfordshire)

As a Parish Council we wish to raise a formal objection to the Environmental Permit Application for the planned incinerator at Rookey Pit, Stewartby, Bedfordshire.

We note that the EA has dismissed our analysis of concerns raised during the first consultation. We therefore submit additional analysis in Appendix 1. We also attach our initial objection for your reference. We still stand by our initial objection and do not feel that the points raised particularly around temperature inversion, human health impacts and the technical capability of the operator have been addressed to our satisfaction.

We ask that you carefully consider these matters before coming to a technical decision regarding the permit. We would also be grateful if you could please acknowledge receipt of this letter.

Regards,

Sarah Watt
Parish Councillor

Cc:	Angela Barker	Councillor	Houghton Conquest and Haynes
	Lisa Frangiamore	Chairwoman	Houghton Conquest Parish Council
	Ben Hayward	Parish Councillor	Houghton Conquest Parish Council
	Peter Bullock	Parish Councillor	Houghton Conquest Parish Council
	Tim Wright	Parish Councillor	Houghton Conquest Parish Council
	Peter Derrick	Parish Councillor	Houghton Conquest Parish Council
	Paul Rolfe	Parish Councillor	Houghton Conquest Parish Council
	Barry Regan	Parish Councillor	Houghton Conquest Parish Council
	Sue Beaumont	Parish Councillor	Houghton Conquest Parish Council
	Gill Wiggs	Parish Clerk	Houghton Conquest Parish Council

Appendix 1: Analysis of Concerns

(1) Social License of Operate

Since our initial objection, we note that there has been an accident at a Covanta plant in Ireland (8 June 2017)¹. This resulted in a number of employees requiring hospital treatment. This case in addition to those highlighted in our first objection highlights that Covanta is not a fit and proper operator. We see no evidence that the operator has good process safety or environmental controls in place.

(2) Consultation Process

We are disappointed in the consultation process itself. We note that this is a high public interest site, with over 2,000 respondents to the first consultation expressing significant concerns. We note that these concerns have been dismissed without significant further investigation or consideration as to how the community has changed in the last number of years.

Our second concern was regarding the EA public meeting which was held at the Marston Vale Forest Centre on (20 September 2017). Our concern regarding this EA meeting is as follows:

- (a) Notification:** The community was given approximately 10 days notification that this meeting was taking place. This did not allow Parish Councils sufficient time to meet and mobilize our community to ensure a strong attendance.
- (b) Data:** We note that the maps of our communities were significantly out of date. These maps did not show recent developments and new residents found it difficult to identify their proximity to the plant and potential impact.
- (c) BACI report:** We have received survey results from BACI which indicated that EA representatives were not well informed of the issues, or that they gave the impression that the consultation process was a done deal.

We assert that due to the lack of notice, poor data and reports regarding the effectiveness of the consultation, that a second community meeting should take place to allow residents to express their concerns, but also understand the environmental controls that are in place. As a council we would welcome the opportunity to meet with the EA, if given reasonable notice.

(3) Temperature Inversion

As part of understanding this project, we have examined other incinerator permit applications. We note that the Sirhowy Valley Incinerator (Wales)² has been rejected on the basis of temperature inversion. We see strong similarities between this site and Rookery Pit. As a council our view is that the temperature inversion question has not been adequately addressed. We ask that the Agency is consistent in its decision making between the Rookery Pit development and the Sirhowy Valley Incinerator.

¹ <https://www.irishtimes.com/news/ireland/irish-news/eleven-hospitalised-after-incident-at-dublin-s-poolbeg-incinerator-1.3112097>

² <http://elflaw.org/all-project-list/lower-sirhowy-valley-waste-processing-facility/>

(4) Best Available Technique Assessment

We have a number of concerns regarding the submission of best available technique (BAT) for the plant. We cannot see how the capital costs of £23m and maintenance costs of £462K are evidenced for the SCR catalyst for the plant. We are also unclear from the documentation if these costs are so significant due to the need to replace the SCR during the life of the plant. We are also unclear how the result of £1.2 million loss of exported power to the grid was calculated.

It is our continued assertion that SCR is one of the better methodologies to reduce NOx emissions.

(5) Air Quality Assessment

We have a number concerns regarding the air quality assessment.

- (a) **Modelling:** The data modelling undertaken has a grid resolution of 158m, which we feel does not provide enough resolution of impact on receptors. We are also unclear where the maximum impact will occur. We note that the air quality assessment only allows for 15km from the incinerator, however there is no data outlining if there is an impact beyond this parameter.
- (b) **Significant but not significant emissions:** We note that in the draft decision document (page 12/202), the EA states “However, where an emission cannot be screened out as insignificant, it does not mean it will necessarily be significant.” Either something is significant or not. We question the air dispersion modelling for this plant (see 5a).

We note that the long-term metals results show that Chromium VI (Air Quality Assessment table 8.2 on page 42) exceeds the PC and % AQAL and PEC and % of AQAL. We also note that in table 7.1 highlights that PAHs, Arsenic, Nickel, Cadmium, Chromium and Chromium VI exceed permitted AQALs. We cannot see how this is insignificant, nor how these concerning emissions will be effectively monitored.

- (c) **Start-up/ Shut down:** We have significant concerns regarding emission from start-up, shut down and commissioning on this plant. We would be grateful for additional information and an outline of controls in place.

(6) Odour Control

We are unclear how odour from the site will be controlled. We expect that the tipping hall will be kept at negative pressure however we cannot find any evidence to demonstrate that this will be the case, nor that pressure monitors will be installed.