

**Covanta Rookery South Limited**

**Proposed Rookery South  
Resource Recovery Facility**

**Preliminary Environmental Report**

**Non-Technical Summary**

**February 2010**

**Project Ref: 21780**

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Proposed Rookery South Resource Recovery Facility  
Preliminary Environmental Report – Non-Technical Summary

## FOREWORD

Covanta Rookery South Limited (Covanta) is proposing to make an application for a Development Consent Order (DCO) to the Infrastructure Planning Commission (IPC) in April 2010 to construct and operate a Resource Recovery Facility at Rookery South near Stewartby, Bedfordshire.

This Preliminary Environmental Report presents preliminary environmental information in accordance with Regulations 2 and 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009. A Non Technical Summary of this Report is also available.

Copies of this Preliminary Environmental Report and the Non Technical Summary have been placed on deposit at the following locations, where they may be examined by members of the public during normal office hours:

Bedford Central Library  
Harpur Street  
Bedford  
Bedfordshire  
MK40 1PG

Bedford Borough Council  
Borough Hall  
Cauldwell Street  
Bedford  
MK42 9AP

Forest of Marston Vale  
The Forest Centre  
Station Road  
Marston Moretaine  
Bedfordshire MK43 0PR

Amphill Library  
Dunstable Street  
Amphill  
Bedford  
Bedfordshire  
MK45 2NL

Central Bedfordshire Council  
Priory House  
Monks Walk  
Chicksands  
Shefford  
SG17 5TQ

Wootton Library  
Lorraine Road  
Wootton  
MK43 9LH

Covanta (Eversholt Office)  
Unit 7, Water End Barns  
Eversholt  
Milton Keynes, MK17 9EA

A copy of the Report may be purchased from the Covanta office referred to above. Copies of the Non Technical Summary are available free of charge from Covanta.

**There is also a telephone enquiry line on 0844 967 1101 for any queries regarding the proposals.** The Preliminary Environmental Report and Non Technical Summary can be found at [www.covantaenergy.co.uk/site/rookerysouth/](http://www.covantaenergy.co.uk/site/rookerysouth/).

For further information on the IPC and the DCO application process visit the IPC's website [www.independent.gov.uk/infrastructure](http://www.independent.gov.uk/infrastructure) or call their helpline on 0303 444 5000.

Covanta welcome your comments on the Project and this Report; representations should be sent to:

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

or [Rookerysouth@covantaenergy.co.uk](mailto:Rookerysouth@covantaenergy.co.uk) on or before 5 April 2010. Please note that representations will be made public.

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## **1 Introduction**

### **1.1 Proposal Overview**

**1.1.1** Covanta Rookery South Limited (“Covanta”) proposes to make an application for a Development Consent Order (DCO) to the Infrastructure Planning Commission (IPC) in April 2010. The DCO would enable Covanta to construct and operate a Resource Recovery Facility (RRF) at Rookery South, a former brick clay pit, near Stewartby, Bedfordshire (the ‘Project’). The main components of the Project are 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, both located in an Operations Area to be situated in Rookery South pit. A fuller description of the Project is set out in Chapter 2 of this document.

**1.1.2** The Project is proposed to provide an important source of renewable energy. Sufficient electricity would be generated by the Project to serve the needs of 82,500 homes, which is broadly equivalent to the housing energy needs of Bedford and the Marston Vale. Furthermore the Project will also provide urgently needed waste recovery capacity to complement waste reduction, re-use and recycling strategies that seek to minimise landfilling – the least sustainable of waste management option.

**1.1.3** The design of the Project continues to evolve with Covanta responding to the constraints and opportunities of the site and its environmental setting as well as the responses received as part of the consultation process to date. At the same time, an environmental impact assessment (EIA) in respect of the Project is being progressed.

### **1.2 The Applicant**

**1.2.1** The group of companies of which Covanta forms a part treats more waste at its EfW Facilities than anyone else worldwide, operating 44 plants worldwide - mostly in the United States. Covanta entered the UK market in 2005 and it offers high quality, safe and efficient solutions for treating residual waste through investing in larger scale plants so as to maximise the economic and environmental benefits, passing these savings on to local authority clients.

### **1.3 Purpose of the Report**

**1.3.1** This document is a summary, in non-technical language, of a Preliminary Environmental Report (PER) that has been compiled in respect of the environmental effects predicted in respect of the Project. Its purpose is so that Covanta can consult upon the Project generally and, in particular, the preliminary environmental information produced to date. The EIA that Covanta is undertaking will have regard to the consultation responses received upon the PER and this Non-Technical Summary (NTS). The results will ultimately be presented within an Environmental Statement (ES) that will accompany the Development Consent Order (DCO) application to the Infrastructure Planning Commission (IPC) in April 2010.

## 1.4 Consultation to Date

1.4.1 Consultation on this Project commenced in November 2008 and continued throughout 2009. Full details of the approach, the consultation carried out to date and that which is proposed up until the DCO application is submitted are set out in Covanta's "Pre-application Consultation Strategy" (December 2009) and the Statement of Community Consultation. These are available on its Project website at [www.covantaenergy.co.uk/site/rookerysouth/](http://www.covantaenergy.co.uk/site/rookerysouth/). In summary, the pre-application consultation involves:

- a. Detailed technical discussions with statutory and non statutory bodies. To date some 75 separate organisations have been consulted on the Project and discussions are continuing;
- b. Door-to-door information drops explaining the Project to homes and businesses within a 5km radius of the site (approximately 15,000 properties) – this was undertaken in July 2009 and is happening again in February 2010;
- c. Establishing a Community Liaison Panel (CLP) of 14/15 members selected by its independent facilitator from approximately 40 volunteers to represent the cross section of community potentially most directly affected by the Project. The CLP has met six times and it is intended that the CLP will continue to meet as the Project progresses;
- d. Running a series of well-publicised exhibitions in the area (six venues over six days in July and August 2009 and a further five exhibitions are proposed in March 2010);
- e. Individual letters on the Project issued in June 2009 and February 2010 to all councillors in Central Bedfordshire, Bedford Borough and Luton, MPs and MEPs, parish councillors, local community representatives, landowners and developers and all others who had expressed an interest since the announcement of the Project;
- f. A pro-active media relations stance; and
- g. Maintaining a dedicated area on the company's web site for this Project ([www.covantaenergy.co.uk/site/rookerysouth/](http://www.covantaenergy.co.uk/site/rookerysouth/)).

1.4.2 The application to the IPC is required to be accompanied by a comprehensive Consultation Report which will set out in full the consultation undertaken on the Project and how the representations and comments received during the pre-application consultation stage (including on this PER) have influenced the submitted DCO application.

## 1.5 The IPC Process

1.5.1 The IPC was established by the Planning Act 2008 and is an independent public body set up to examine and decide applications for nationally significant infrastructure projects (NSIPs) such as the Project. After 1 March 2010 the IPC replaces the Secretary of State for Energy and Climate Change as the applicable determining body for energy development proposals generating over 50 mega watts of electricity. Further information on the IPC and the application process can be found at the IPC's web site [www.independent.gov.uk/infrastructure](http://www.independent.gov.uk/infrastructure) or by calling their helpline on 0303 444 5000.

## **1.6 Making Representations on this Report**

- 1.6.1** Covanta is consulting on the PER and this NTS with statutory and non-statutory consultees, as well as the public, as part of a comprehensive consultation exercise in relation to the Project. Details for making representations on this Report are provided in Foreword to this document.

## **2 The Site & the Proposed Development**

### **2.1 Site Location**

**2.1.1** The Proposed Application Site (an area of approximately 120 hectares (ha)) is mainly located within The Rookery - and Rookery South pit in particular - situated in the Marston Vale between Milton Keynes and Bedford, immediately south of Stewartby as shown on Figure 1 (all figures are found at the end of this document). The Proposed Application Site lies predominantly within the administrative area of Central Bedfordshire Council (CBC) and, in part, within the adjacent Bedford Borough Council (BBC).

### **2.2 Site Description**

#### **The Rookery**

**2.2.1** The Rookery comprises two large former clay pits, Rookery North and Rookery South covering an area of approximately 210ha. The pits, now disused, supplied Oxford Clay for brick manufacture at the London Brick Company works at Stewartby.

**2.2.2** The Rookery is proposed to be restored in accordance with a low level restoration scheme currently being considered by CBC (under a Review of Old Minerals Permissions (ROMP) process) with a decision anticipated early in 2010. Therefore, the Project will be located on an area of restored land the characteristics of which will form the environmental baseline of the EIA for the Project. It is intended that the Project will not proceed until the relevant parts of the low level restoration scheme have been implemented.

#### **Rookery North Pit**

**2.2.3** Rookery North pit, approximately 70ha in area, presently contains a lake in the central/western area with associated wetland habitat, and a backfilled area in the east and south-east comprised largely of inert waste deposited under a waste management licence.

#### **Rookery South Pit**

**2.2.4** The Operations Area (an area of approximately 14 ha) will be located in the north-western quadrant of Rookery South pit, which is an area of approximately 95ha. The majority of the pit is approximately 14m below existing ground level, standing at approximately 28m above Ordnance Datum (AOD), and is bounded by steep clay banks which are varied in nature and substrate. The land around the periphery of the pit is primarily grassland with scattered scrub.

### **2.3 Surrounding Area**

**2.3.1** The Rookery lies within a post-industrial landscape which is presently undergoing significant change. Key features of the area are shown on Figure 2.

**2.3.2** To the east and west The Rookery abuts two railway lines, the Midland Main Line to the east running on an embankment, and the Marston Vale Branch Railway Line to the west. Further west lies the Marston Vale Millennium Country Park, which includes the Forest Centre,

located just to the south of Stewartby Lake. An extensive network of footpaths exists in the locality, however across The Rookery itself there is minimal formal public access.

**2.3.3** South Pillinge Farm, a Grade II listed building, is the closest residential dwelling to the Operations Area (located 250m to the south), separated by an area of trees. There are also other listed buildings in the vicinity of the Proposed Application Site.

**2.3.4** To the north of The Rookery lie the former Stewartby Brickworks and the settlement of Stewartby, a Conservation Area. Millbrook Proving Ground, a vehicle testing ground, is located to the south of The Rookery.

## **2.4 Proposed Low Level Restoration Scheme (LLRS)**

**2.4.1** The objectives of the proposed low level restoration scheme (LLRS) include to restore the former Rookery clay workings as well as providing an enhancement to a currently degraded landscape in the Marston Vale. The LLRS in Rookery South pit will comprise: re-profiling; extraction of soils and clays; surface water drainage measures; a landscape strategy; and new access ramps leading from the existing ground level at the perimeter of Rookery South pit down to the pit base. On implementation of the LLRS, the Operations Area will be levelled and raised to an average of 30m AOD. Figure 3 shows the proposed LLRS that is being considered under the ROMP process.

## **2.5 The Proposed Development**

**2.5.1** Figure 4 shows a preliminary layout of the Operations Area of the Project and Figure 5 shows preliminary computer generated images of the EfW Facility. Careful attention has been given to the design of the Project, particularly the EfW Facility. The key components of the Project are:

- a. an Energy from Waste (EfW) Facility with an average gross electrical output of 65 MWe. The Facility will comprise three waste processing streams consisting of a reciprocating grate, furnace, boiler and associated air pollution control system in each stream. The nominal capacity of the EfW plant is 585,000 tonnes per year of mixed residual municipal and commercial and industrial waste. Fluctuations in plant availability and waste calorific value may vary the annual waste throughput, albeit this will not exceed 645,000 tonnes per year. The stack associated with the EfW Facility will be 105m tall (approximately 135m AOD) and the highest part of the roof would be 43m (approximately 75m AOD); and
- b. a Materials Recovery Facility (MRF) to recover bottom ash and co-mingled metals.

**2.5.2** The Project would also include:

- a. ancillary plant, equipment and buildings to accommodate the development;
- b. a facility to enable steam pass-outs and/or hot water pass outs (Combined Heat and Power Facility) for potential off site users of process or space heating;
- c. internal site roads, car and heavy goods vehicle (HGV) parking;
- d. landscaping and habitat creation with any related fencing or boundary treatments;

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- e. site access to the Operations Area from Green Lane together with the improvement/upgrading of the junction of the site access with Green Lane;
- f. provision of footpaths, cycleways and footpath linkages;
- g. underground electricity grid connection infrastructure;
- h. a Visitor Centre located within the EfW Facility;
- i. foul drainage provision, surface water management systems and any culverting; and
- j. partial demolition of the former conveyor structure on the Proposed Application Site.

**2.5.3** An option to construct a pedestrian and cycle bridge over the Marston Vale Branch Railway Line better to connect local footpath networks is presently being explored. Consideration is also being given to potential improvements to the Green Lane railway level crossing to the west of the proposed site access, which may include safety barrier upgrades. An emergency access for use by Fire and Rescue vehicles is currently being considered to connect the Operations Area to Station Road located to the south of The Rookery.

### Proposed Waste Catchment Area

**2.5.4** Figure 6 shows the area within which it is intended to source waste for the EfW Facility.

**2.5.5** The primary catchment area represents Covanta's intention to bid to manage residual wastes arising within the Bedfordshire and Luton sub-region and the mature stage of its discussions with Buckinghamshire County Council, similarly to manage residual municipal waste. Commercial and industrial wastes may also be sourced from across the primary catchment area. The secondary catchment area indicates where Covanta is currently pursuing other residual municipal waste contract opportunities and other sources of commercial and industrial waste.

**2.5.6** In total there is approximately 2 million tonnes of residual municipal and commercial and industrial wastes arising within the proposed catchment area, approximately 370,000 tonnes of which arise in the Bedfordshire and Luton sub-region. Covanta does not propose to accept waste from London.

### Operational Hours, Deliveries & Workforce

**2.5.7** The EfW Facility will be operational for 24 hours/day, 365 days/year.

**2.5.8** Covanta will restrict the deliveries of residual waste to 05:00 until 23:00. However, the significant majority of deliveries waste will be between 08:00 and 17:00. No waste will be accepted on Sundays, Christmas Day, New Year's Day or Easter Day except in emergencies or exceptional circumstances.

**2.5.9** The normal operational hours of the MRF will be:

- a. Monday to Friday – 07:00 to 18:00;
- b. Saturday – 07:00 to 14:00; and

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c. Sunday – closed, but could operate in emergencies or exceptional circumstances.

**2.5.10** The operation of the EfW Facility will generate 68 permanent jobs, together with 11 HGV drivers based at The Rookery. There will also be 7 employees operating the MRF.

**EfW Facility & MRF Outputs**

**2.5.11** The EfW Facility will generate approximately 65 MWe gross. The electricity would be over 50% renewable and 55 MWe would be transmitted to the Marston Primary Substation via a new underground connection. The EfW Facility will also be designed to export heat/steam through a combined heat and power (CHP) capability. Covanta is currently in negotiations with a number of potential nearby users of the heat such as Center Parcs and NIRAH.

**2.5.12** Combustion gasses discharged up the chimney stack will be treated to ensure they meet the requirements of the Waste Incineration Directive (WID). The treated emissions are monitored by the emissions monitoring equipment so that they do not exceed the WID limits. Flue gas treatment (FGT) residue is produced as part of this process and equates to approximately 4% of input waste by weight. The FGT residue (primarily filter dusts) will be transported off site in sealed containers to a specialist treatment/landfill facility.

**2.5.13** Following combustion of the waste, an ash residue remains which contains metals. Of the incoming waste to the RRF, approximately 20% would remain as bottom ash and a further 5% would be metals. The bottom ash with co-mingled metals will be transferred from the EfW ash storage bunker to the adjacent MRF for processing. The aggregate will be resold to the construction industry for road construction and other civil engineering uses.

**Landscape Proposals and the Wider Site**

**2.5.14** The preliminary landscape and ecological strategy seeks to:

- a. create an appropriate setting for the built development and associated infrastructure;
- b. ensure visual integration with the landscape of the Marston Vale and Greensand Ridge;
- c. minimise the predicted visual and audible impact of the built form from key locations;
- d. maximise the ecological value of the Proposed Application Site and wider setting; and
- e. enhance the visitor experience in conjunction with rights of way improvements.

**2.5.15** The planting and associated bunding will provide screening of the building and operational activities. The preliminary landscape and ecological strategy is shown in Figure 7.

**2.5.16** As part of the Project, a purpose-designed external lighting scheme will be installed to provide illumination and security lighting for the various areas around the Operations Area whilst respecting the location of the site.

**2.5.17** The LLRS will provide a surface water drainage strategy, which will comprise an attenuation pond and associated interceptor/surface water routing channels, and which has been designed to cater for surface water run-off arising from the Operations Area. It is intended that the Project's Drainage Strategy will utilise key features of the LLRS and provide a drainage pipe system that will take excess water from the Operations Area to the attenuation pond.

## **2.6 Construction & De-commissioning**

### **Construction**

**2.6.1** The construction period is anticipated to take approximately 39 months. The current estimates for the development timescales are as follows:

- a. Commence construction in Summer 2011;
- b. Complete construction in Spring 2014; and
- c. Complete commissioning in Winter 2014.

**2.6.2** During the construction period described above, the normal hours of working will be:

- a. Monday to Friday: 07:00 to 19:00 hours (excluding bank holidays); and
- b. Saturday: 07:30 to 13:00 hours.

**2.6.3** The workforce for the construction of the development will average around 320 over the anticipated 39 month construction period, with a peak of around 640.

**2.6.4** The construction access into the Operations Area will be gained from Green Lane.

### **De-commissioning**

**2.6.5** When the RRF has reached the end of its operational life, it may be adapted for an alternative use or demolished as part of a redevelopment scheme and the Operations Area cleared and left in a fit-for-use condition. If CHP has been successfully introduced it may be necessary to ensure that an energy supply capability is retained.

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

#### **3.1 Introduction**

**3.1.1** This chapter describes how alternatives have been considered and the design development progressed to date. Some aspects of the design have been fixed at this stage. Others, which are subject to further refinement, remain unfixed. Covanta is especially interested in views on these elements of the Project.

#### **3.2 Consideration of Alternatives**

**3.2.1** Alternatives have been considered from the strategic scale - considering the throughput/size of the RRF and appropriate sites to accommodate it – to local scale alternatives, such as location and configuration of the RRF on the Proposed Application Site. These are discussed below.

##### **Plant Size**

**3.2.2** Plant size is chosen based upon Covanta's assessment of existing waste management capacity, forecast waste arisings and waste management capacity needs. Covanta believes that there is an urgent and significant demand for approximately 2 million tonnes per annum of residual waste management capacity within the primary and secondary catchment areas which it intends the Project to serve

**3.2.3** Covanta considers that there are significant economies of scale that can be realised through larger scale plant. Economic and land take efficiencies are delivered through a reduction in development requirements, but environmental benefits can also be realised with transport burdens being outweighed by the greater energy efficiencies of the larger scale plant.

##### **Site Selection**

**3.2.4** Covanta intends to bid to manage residual wastes arising within Bedfordshire and Luton. It is also in the process of pursuing similar contract opportunities within Buckinghamshire and other adjoining authorities. In addition, Covanta intends to manage commercial and industrial wastes. Some wastes would also be drawn from beyond these administrative areas, most likely from adjacent areas,

**3.2.5** Some 325 sites/locations were subject to desk based assessment. Further analysis and site visits to 52 of these sites reduced the number of sites to 11 for detailed examination. Rookery South is shown to be an appropriate site at which to locate the Project and is favoured for reasons including:

- a. central location within the Study Area – for ease of access;
- b. the area is identified in regional and local policy for regeneration and development;
- c. the Project would provide employment opportunities in an area where a large employer (Hanson) has recently left;
- d. opportunities exist for CHP nearby;

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- e. close proximity to a proposed electricity connection point;
- f. opportunity to enhance the site restoration scheme and to deliver green infrastructure; and
- g. increased public accessibility in The Rookery and the wider Marston Vale as a result.

### Plant Design

#### 3.2.6 Alternatives considered included:

- a. The position of the RRF within Rookery South;
- b. Site configuration and layout – building orientation and alternative plant layout arrangements;
- c. Developing an initial design concept into a building code for the building design and layout for the Operations Area; and
- d. Architectural design – including layout; massing and height; colour; and stack number, position and height.

### 3.3 Current Status of Design

#### 3.3.1 Some key parts of design and operation for the Project have now been fixed, although comment and consultation responses remain important. The fixed design parameters provide environmental assumptions for assessment purposes. Matters which are now fixed at this stage are shown on Figure 8. Those which remain to be fixed are described below.

#### Unfixed Design & Operational Parameters

#### 3.3.2 Covanta is keen to receive comments on:

- a. Vehicle delivery hours – proposed as 05:00 to 23:00 with the majority of vehicle deliveries between 08:00 and 17:00 (see para 2.5.8 above);
- b. A pedestrian and cycle bridge may be constructed over the Marston Vale Railway Line and site access road - the principle and location of the bridge have yet to be finalised as well as its design;
- c. Changes are proposed to the existing network of rights of way. This would include new and improved links to the existing network;
- d. The general range and approach to material colours for the buildings have been determined through colour studies but final finishes and materials have to be decided;
- e. The final shape of the roof to the EfW Facility is subject to ongoing discussions (notably with English Heritage and CABE), although the overall height of the building and the scale of the structure are fixed;
- f. A preliminary drainage strategy has been prepared for the Project;

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- g. A lighting strategy has been proposed and forms the basis for the lighting impact assessment but could be varied;
- h. Vehicle routing – routing for delivery vehicles during both the construction and operational phases of the Project is subject to assessment and further consultation. It is proposed that no waste bulk haulage vehicles (with the exception of local refuse collection vehicles) will access the site from the east via Stewartby;
- i. Waste sources – the sources of waste and proportional mix of MSW and CIW to be processed are subject to ongoing review and depend on the waste contracts that are awarded to Covanta. However the Project will not treat waste from London; and
- j. Rail connection – Covanta does not currently propose to provide a rail link/sidings as part of the Project. It may be able to make passive provision for a rail link at the Proposed Application Site. Covanta welcomes the views of consultees in this respect.

### Transport Arrangements

- 3.3.3** Access to and from the RRF is proposed via a new junction on Green Lane to the east of the level crossing. This will connect with the improved A421 (due for completion at the end of 2010) at junctions at Marston and Marston Leys. HGVs will access the RRF using the new dual carriageway A421 and to the M1 to the south and the A6 Bedford Southern Bypass. From the A421 HGVs will access the RRF using Green Lane, but HGVs will not be permitted along Green Lane east of the RRF access. Detailed highway routes will be imposed on all HGVs delivering to the site to minimise the impact of traffic particularly through Stewartby.
- 3.3.4** Covanta has looked at using rail to supply waste to the Project. Given likely waste streams this is not a viable option for now. This option can be considered further through the development of the proposals.

## **4 The EIA & Preliminary Findings**

### **4.1 Introduction**

**4.1.1** The Preliminary Environmental Report has been prepared as part of the process of preparing the ES. It records the preliminary findings of the EIA process and the mitigation currently proposed. This chapter presents a summary of the preliminary environmental information relating to the assessment which is being undertaken.

### **4.2 Transport & Access**

**4.2.1** The Project will process 585,000 tonnes of waste per year, all of which will be imported by road using HGVs. Combining this with staff trips and deliveries, a daily rate of 266 two-way trips, of which approximately 180 will be HGVs, is being assessed. The robustness of this is being checked by a series of scenarios that look impacts arising from different vehicle types and numbers.

**4.2.2** The impact of the traffic generated by the construction and operation of the Project is being considered in terms of severance, pedestrian amenity, fear and intimidation, accidents and safety, hazardous loads, and pedestrian and driver delay. The assessment looks at how conditions change with and without the Project.

**4.2.3** Baseline conditions without the Project include the upgraded A421 between the M1 at junction 13 and Bedford for an opening year of the Project of 2014 and an assumed design year of 2020. These same years are assessed with the Project in place.

**4.2.4** Few people are directly affected by the Project, due to the relatively low number of pedestrians, cyclists and drivers along the highway routes to be used - Green Lane and the old A421. Nevertheless a full assessment is being undertaken in accordance with The Guidelines for the Environmental Assessment of Road Traffic as published by the Institute of Environmental Management and Assessment.

**4.2.5** Traffic impact mitigation includes:

- a. traffic movement control including restrictions on delivery hours, an HGV Route Management Plan and a monitoring and control system;
- b. a workplace Travel Plan to minimise the impact of staff traffic movements in the area;
- c. construction traffic movement control including an HGV Route Management Plan, monitoring and control, and the provision of bus transport for construction workers;
- d. a new junction with a right turning lane on Green Lane to provide access to the RRF;
- e. improvements to the footway / cycleway provision on Green Lane linking to Stewartby and also to the footway / cycleway network around Stewartby lake;
- f. enhancements to footpaths and cycle routes in the area; and
- g. exploring the potential provision of contributions to Network Rail for the upgrade of the Green Lane level crossing and a possible new pedestrian and cycle bridge over the Marston Vale railway line.

### **4.3 Air Quality**

**4.3.1** The Project has the potential to affect local air quality during construction and operation. The following sources have the potential to cause significant emissions and are therefore being assessed within the EIA:

- a. Construction Phase:
  - i. Dust emissions from construction activities, through for example vehicles moving over dusty services and wind disturbing stockpiles of dry materials; and
  - ii. Emissions associated with traffic accessing the Project during construction.
- b. Operational phase:
  - i. Emissions from the RRF, which will be released up the stack, associated with the combustion of waste materials; and
  - ii. Emissions associated with traffic accessing the Project during operation, including HGVs bringing waste to the RRF.

**4.3.2** The effects assessed include:

- a. Dust – determining how close receptors (principally local houses) are affected by any dust emissions and the effect of weather conditions on dust generation;
- b. Traffic emissions – construction and operation flows of HGVs and other vehicles associated with the Project are being considered to understand the effect on air quality of Project traffic;
- c. Emissions from burning waste – is subject to detailed assessment. A dispersion model has been used to predict how emissions from the EFW Facility will move around in the air to understand the effect of emissions on local receptors.

**4.3.3** Due to their proximity to the Operations Area, South Pilling Farm and The Forest of Marston Vale Millennium Country Park could be affected by dust but probably only for 12% of the year (due to dust suppression caused by rain and calm weather, and as these locations are not down-wind of prevailing south-westerlies). Mitigation measures will be utilised if weather conditions suggest that dust mobilisation could occur.

**4.3.4** During operation of the RRF only one road, Green Lane between the entrance to the RRF and the A421, has an increase in total traffic predicted to be greater than 10% and an increase in HGVs greater than 200 HGVs per day. Further assessment however has suggested that air quality close to Green Lane will not be significantly affected by traffic associated with the Project and no air quality standards should be breached.

**4.3.5** The Project has been carefully designed so that emissions released from the stack are within the requirements of the WID. The modelling of emissions released by the stack has determined that emissions should not have a significant effect on local air quality, the health of local people or nature conservation sites. No air quality standards are predicted to be breached.

## **4.4 Noise**

**4.4.1** Noise will be created during the construction and operation of the Project and this may affect the residents near to the Proposed Application Site and users of nearby recreational and amenity areas. Sound can be heard over long distances. The effects at all local communities are being considered. Sound levels decrease with distance from the source. The effects at the nearest residential locations, Stewartby to the north and South Pilling Farm and Pilling Farm Cottages to the south, have been studied in detail as these would potentially be most affected.

**4.4.2** The acceptability of any new noise will depend on its level, or loudness, and the level of noise existing in that area due to other sources of noise. The noise assessment therefore, includes a noise survey at selected locations around the Proposed Application Site which were agreed with the local authorities. The survey shows that noise in the area can fall to low levels, particularly at night, except at locations close to roads.

**4.4.3** A computer model of the proposed buildings and equipment associated with the RRF has been developed to allow noise levels to be calculated at the surrounding locations. The computer model is being used to calculate the noise levels arising during construction and operation of the Project, including the effects of vehicle movements. Examining a scenario where two piling rigs will operate simultaneously, predicted construction noise levels would be below the thresholds of significance at the nearest noise sensitive dwellings. However, additional items of plant will be operating during parts of the piling programme and overall noise levels would be expected to be higher than those caused by piling alone. The preliminary assessment for operational noise indicates that the predicted noise from the plant will generally be below the target at all receptors except at South Pilling Farm, where it will be marginally exceeded by approximately 1 dB during the daytime. The preliminary assessment shows that noise from vehicles using the access road would meet appropriate noise limits and early morning use should not cause a risk of sleep disturbance.

**4.4.4** In cases where targets are not met, modifications are being made to the design of the Project, including changes to layout, selection of quieter equipment and increasing the sound insulation provided by the buildings on an ongoing basis.

**4.4.5** The building is being designed to include mitigation measures such as high performance acoustic louvres to minimise the sound breakout via ventilation openings and a masonry turbine hall building to minimise the breakout noise from equipment. Consideration is currently being given to increasing the sound insulation of the building.

**4.4.6** Changes in traffic noise on the wider road network will be small on all links, but further work will be undertaken to quantify the change in overall noise at properties close to Green Lane.

## **4.5 Landscape & Visual**

**4.5.1** The Landscape and Visual Impact Assessment considers impacts of the Project on landscape character and visual receptors.

**4.5.2** Marston Vale is characterised by a range of land uses including scattered settlement, fractured tracts of farmland, active and restored landfill areas, and former clay pits. It is undergoing change as the Forest of Marston Vale is established, landfill operations are completed, and significant new developments are built.

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- 4.5.3** The Marston Vale has a range of views of the Project, including elevated views from the south and east looking down from the Greensand Ridge, and closer views from the north and east at closer proximity and across generally flat ground.
- 4.5.4** Covanta has considered the design and setting of the Project to arrive at the most appropriate building design and landscape strategy for its setting. Mitigation measures form an inherent part of the design, and the assessment is based on the Project with this mitigation. Aspects of the design comprising final building envelope roof/enclosure form and selection of material finishes are subject to ongoing discussions with English Heritage and the Commission for Architecture and the Built Environment (CABE). Mitigation, through the landscape and ecological strategy (see Figure 7 for preliminary strategy), including the use of bunds and fringe woodland, also forms part of the strategy for integration of the Project.
- 4.5.5** The EfW Facility has been designed as a series of interlinked 'boxes' on an east-west axis. It enables shadows to be cast, and in conjunction with regressive material colours, assists in its landscape and visual integration. Consideration has also been given to the position of the Operations Area within Rookery South, the number, height and design of the stack; the height and massing of the main buildings; and selection of building material finishes.
- 4.5.6** The landscape and ecological strategy (see Figure 7) has been developed to establish an appropriate setting for the Project. The primary purpose of the planting and associated earthworks is to provide screening of the lower portions of the building and operational activities (such as vehicle movements). There are also ecological benefits of increasing the overall coverage of woodland, creating corridors, and integrating existing fragmented woodland blocks.
- 4.5.7** It is anticipated that a range of indirect adverse effects will be recorded upon the landscape. but the Project will form part of a series of new features including already consented developments in this evolving landscape. When considered in isolation, the RRF will appear as a new built feature rising from a wooded fringe. The wooded fringe will, particularly in longer range views, enable the RRF to appear as a building in the landscape devoid of lower level movement and secondary elements including significant views to the MRF. In elevated views the building will not break the skyline with the exception of the stack and, as such, remains subservient to the wider landscape context.
- 4.5.8** It is anticipated that a range of indirect adverse effects will be recorded upon the agreed visual receptors at a long, middle and short range distance. The RRF has been given careful design consideration addressing the receptor 'audiences' identified. To the north, views from Stewartby are generally from flat to slightly elevated ground and partly screened by existing tree cover within the Rookery North and interrupted by existing buildings in the village. To the east and south views are from elevated land and property including public recreation land and rights of way as well as from settlement edges which overlook the lower lying Marston Vale. To the west views from land and property are from flat ground and include those from isolated settlement edges and publicly accessible recreation areas.

## **4.6 Cultural Heritage**

- 4.6.1** The Cultural Heritage Impact Assessment considers impacts of the Project on cultural heritage assets. Cultural heritage assets, as interpreted here, comprise an agreed schedule

of historic buildings (of all Listing grades), registered parks and gardens and archaeological sites.

**4.6.2** For the assessment, a distinction is made between assessing the effect of the Project on heritage assets in close proximity to the Proposed Application Site (0-3km from the site boundary – the Inner Study Area) and assets in the wider landscape (between 3km and 10km from the Proposed Application Site – the Outer Study Area). In the former, all known cultural heritage assets (designated and undesignated) are being considered for potential impacts. In the latter all designated cultural heritage assets are being considered for potential impacts.

**4.6.3** Potential impacts are assessed under two main headings:

- a. Direct physical impacts on archaeological assets within the Proposed Application Site; and
- b. Impacts on the setting of sensitive heritage assets within the study area.

**4.6.4** The majority of the development will take place within Rookery South. With no potential for archaeological assets to survive here, the issue of direct impacts does not arise. However, the landscape and ecological strategy includes the planting of trees at the margins of the pit in currently undisturbed areas and a cable trench will be dug along Green Lane. The limited potential for direct impacts in these areas can be mitigated through archaeological works during construction.

**4.6.5** The Project will be visible from a distance. Therefore, it has the potential to affect the setting of cultural heritage assets. The assessment focuses on a shortlist of assets, supported by visualisations from key viewpoints. In addition, numerous other heritage assets have been considered. Site visits and analysis of theoretical visibility reveals that there would be no significant impact on these other assets and further assessment was not required.

**4.6.6** The mitigation of impacts on the setting of heritage assets has been addressed from an early stage in the design of the Project and the assessment of effects is therefore based on the agreed mitigation measures being embodied in the Project proposals. Aspects of the design comprising final building envelope roof/enclosure form and selection of material finishes are subject to ongoing discussions with English Heritage and CABI. Mitigation through the landscape and ecological strategy, including the use of bunds and fringe woodland, also forms part of the strategy for integration of the Project.

**4.6.7** Avoidance of direct impacts on archaeological assets is the preferred mitigation strategy but where impacts cannot be avoided, or are considered to be acceptable, an approved programme of archaeological excavation and recording will be used to offset the loss of archaeological deposits.

## **4.7 Ecology & Nature Conservation**

**4.7.1** A preliminary assessment of the ecological impacts associated with the Project has been undertaken. Best practice methodology set out by the Institute of Ecology and Environmental Management has guided as assessment of the impacts both in the local area as well as at sites designated for their nature conservation value in the wider area.

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- 4.7.2** The relevant ecological baseline and scope of the assessment was agreed through consultation with key ecological stakeholders, including Natural England. Of particular importance is the agreement with Natural England that (i) the appropriate ecological baseline for assessment is based on the assumption that the LLRS has been implemented; and (ii) that no sites of European Importance will be affected such that Appropriate Assessment in accordance with Habitats Regulations is not required.
- 4.7.3** Relevant baseline conditions are informed by review of ecological records, recent field survey data and the LLRS. This allows potential impacts to be identified as being:
- a. Loss of low grade agricultural grassland from the base of Rookery South within the building footprint;
  - b. Loss and/or disturbance to areas of semi natural grassland and scrub habitats in peripheral areas, including along proposed access routes;
  - c. Loss of bare ground and short ephemeral/short perennial habitats from the western slope of Rookery South;
  - d. Lighting effects during the operational phase along access route and within the Operations Area; and
  - e. Changes to air quality and acid/nitrogen deposition at designated sites in the wider area.
- 4.7.4** Key ecological receptors associated with The Rookery and with the potential to be affected by these impacts are considered to be great crested newts, invertebrate assemblages and stoneworts. In addition, changes in air quality and acid and nutrient nitrogen deposition have the potential to affect habitat quality and composition in designated sites in the wider area.
- 4.7.5** The potential both for adverse and beneficial ecological impacts was recognised early in the design of the Project. Relevant and effective measures to minimise harm and maximise opportunity are therefore an inherent part of scheme design. These measures include:
- a. Minimising loss and disturbance to grassland and scrub habitats in order to maintain or increase habitat extent and particularly to enhance ecological connectivity through use of native stock of local provenance. The Project proposes planting to complement that associated with the LLRS. This will link existing woodland blocks and areas of scrub with The Rookery and strengthen the integrity of the existing green infrastructure;
  - b. Inclusion of vegetated surfaces in building design in the form of green and brown roofs and green walls. These will recreate the low nutrient conditions currently offered by the bare ground habitats on the western slope of the pit and contribute to compensating for the effects of habitat loss on high value invertebrate assemblages; and
  - c. Managing lighting impacts by maintaining unlit corridors and minimising lighting within the Proposed Application Site in order to maintain nocturnal use by key species, particularly along boundaries, through careful lighting design.
- 4.7.6** Finalisation of the preliminary landscape and ecological strategy and the preliminary lighting strategy for the Project, and agreed objectives in relation to the vegetated surfaces to be included in building design, will provide the detail required to assess the significance of the ecological impacts.

**4.7.7** During operation, the RRF has the potential to result in changes in (i) air quality and (ii) acid and nitrogen deposition. These changes have the potential to impact adversely on plant communities, both within The Rookery and within statutory and non-statutory designated sites in the wider area.

## **4.8 Land & Water Quality**

**4.8.1** This assessment has been informed by undertaking a Geotechnical and Geoenvironmental Desk Study of the Proposed Application Site, including a qualitative preliminary risk assessment, confirmed by undertaking an intrusive ground investigation, which has facilitated a risk assessment.

**4.8.2** Whilst the initial risk assessment identified some potential sources of contamination that could be present at the Proposed Application Site, the ground investigations have confirmed a general absence of these sources and recorded no elevated concentrations of potential soil contaminants. The Proposed Application Site is situated in a relatively low sensitivity geoenvironmental setting for the following reasons: there are no significant groundwater abstractions within the vicinity; there are no groundwater source protection zones on or overlapping the Proposed Application Site; the Minor Aquifers of the Kellaways Sand and Cornbrash Formation are of limited thickness, low permeability and poor quality, the Major Aquifer of the Blisworth Limestone Formation is of low permeability, poor quality and is protected by the overlying Blisworth Clay Formation.

**4.8.3** The preliminary findings of the assessment have identified the following potential hazards: high groundwater levels, potentially unstable slopes, potential construction related contamination sources, potential future contamination sources (from the MRF, waste bunker, hazardous materials storage area).

**4.8.4** The following potential mitigation measures have been identified: incorporation of environmental management procedures during and post construction in order to control hazardous substance storage areas; inclusion of trapped gullies, petrol interceptors and isolation valves to control the potential for diffuse pollution from surface water run-off; provision for silt collection from accumulated surface waters prior to discharge to Mill Brook; adoption of appropriate piling procedures in order to avoid mixing of groundwater bodies where necessary.

**4.8.5** Evaluation of potential pollution linkages (routes by which receptors can be affected by contamination) has shown that the overall geoenvironmental risks associated with the Proposed Application Site are low or very low.

## **4.9 Hydrology & Flood Risk**

**4.9.1** This section considers flood risk and surface water management, specifically:

- a. Whether the Project is likely to be affected by current or future flooding arising from watercourses lying adjacent to/in close proximity to the Proposed Application Site; and
- b. Whether the Project will increase flood risk elsewhere.

**4.9.2** The key findings following review of flood risk matters are:

- a. A hydraulic model of the Mill Brook has been created to assess if floodwaters may spill into Rookery South. The model provides a series of design flood levels for the 1 in 100

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year flood (a flood event that happens on average once in 100 years) and the 1 in 100 year event plus allowance for the increase in flood associated with climate change. The modelling analysis suggests that floodwater may spill into the south-eastern corner of Rookery South during the 1 in 100 year event. However, the proposed landform associated with the LLRS is such that (i) the Operations Area is elevated above existing levels and (ii) any floodwater spill will be intercepted and routed to the Rookery South attenuation pond. On this basis, the Operations Area will not be affected by flooding associated with either the 1 in 100 year or 1 in 100 year plus climate change events.

- b. As a result, the RRF will be safeguarded from flooding to the required design standard and the Project will be categorised as “nil detriment” (no change) in terms of off-site/downstream flood risk impacts.
- c. Surface water run-off from the Operations Area and access road can be accommodated within the Rookery South attenuation pond and will be conveyed to the pond using a piped drainage system.

**4.9.3** In summary, there will be no detrimental impact on flood risk as a result of the RRF therefore no further mitigation measures are required.

## **4.10 Socio Economics**

**4.10.1** The socio economics assessment considers the potential economic and social effect of the construction and operation of the Project. The study area focuses on Marston and Wootton Wards, the wards within which the Proposed Application Site is located and adjacent to, and Mid Bedfordshire District Council (now Central Bedfordshire Council) and Bedford Borough Council, which are considered the areas most likely to be impacted by the Project. The change from Mid Bedfordshire District Council (MBDC) to Central Bedfordshire Unitary Authority has not been reflected in any available data sets. Therefore there is no information for CBC, as such, and information for MBDC has been used.

**4.10.2** Economic policy concentrates on sustaining economic growth in the region and specifically for Central Bedfordshire to reduce the amount of out-commuting by providing more opportunities for local employment.

**4.10.3** Baseline conditions present a picture of Marston and Mid Bedfordshire being prosperous rural communities, which have shown continued levels of growth in population, and qualifications attainment. The level of economic activity in these areas is significantly above the national average, even in light of the demise of the brickwork industry. Bedford Borough, in comparison, shows trends more comparable to the national average and has greater levels of deprivation and unemployment.

**4.10.4** The construction of the Project is estimated to require on average 320 construction personnel over the anticipated 39 month construction period. Allowing for the indirect effect of such employment on the local economy, jobs being filled by non-local employees and the potential displacement of an employee from another job it is calculated that the construction of the Project will generate 100 full time equivalent positions for the 39 month construction period that will go to people living within Marston, Wootton, Mid Bedfordshire and Bedford Borough, and a further 10 positions to the wider East of England.

**4.10.5** It is estimated by Covanta that approximately 86 full time equivalent jobs will be created by the Project. The RRF will be manned by a permanent crew of 68 personnel with a mixture of

day workers and shift workers, 11 HGV drivers and 7 employees operating the MRF. Assuming similar allowances as for construction employment generation, this equates to 81 full time equivalent jobs for people living in Marston, Wootton, Mid Bedfordshire and Bedford, and a further 8 positions to the wider East of England.

- 4.10.6** In addition the Project can provide local social benefits through community engagement and cohesion. Ongoing consultation, the establishment of the Rookery South Community Liaison Panel and the provision of a visitor and education centre will help to achieve integration.

## **4.11 Other Issues Considered**

### **Aerodrome Safety Zone**

- 4.11.1** As a result of the Project's proximity to Cranfield Airport, a licensed aerodrome, the airport has been consulted and a desk based assessment undertaken to determine whether the Project will have any effect on the airport. Potential effects principally relate to the height and location of the stack.
- 4.11.2** As a result of these consultations and design iteration, it has been identified that restricting the height of the stack avoids potential disruption to the operations of the airport. Consequently the stack has been limited to 105m (135m AOD). This height allows for the continued safe operation of aircraft in the vicinity of the airport and the airport has confirmed that the stack height "would not have any impact on our current procedure".
- 4.11.3** Further mitigation, in the form of appropriate aeronautical lighting, will be also provided to adequately mark the stack for pilots flying in the vicinity. This currently being agreed with the Directorate of Airspace Policy at the Civil Aviation Authority.

### **Agriculture & Soils**

- 4.11.4** The LLRS, described in section 2.4 above, will be implemented at The Rookery to restore the former clay workings and will include the restoration of Rookery South pit to low intensity agricultural use, although the restored area could also be suitable for other uses.
- 4.11.5** It is considered, given the quality of topsoil to be provided as part of the LLRS, that any agricultural land provided within Rookery South would be suitable for pasture. However this agricultural land does not currently exist, and hence is not yet in use. Therefore, it does not form part of an existing agricultural business. This loss is not considered to result in a significant adverse effect, as the agricultural land being lost would not be of a high grade and will not affect the operation of a current agricultural business.
- 4.11.6** Soils would be handled in accordance with best practice to avoid compaction and construction traffic would be managed to avoid compaction. Such measures would be set out in the Construction Environmental Management Plan (CEMP), which would be agreed with the appropriate authority. Information relating to the CEMP will be contained in the ES.

### **Utilities**

- 4.11.7** The connection of the RRF to the national grid/network distribution operator will covered by a separate application. However for completeness the EIA is considering the potential environmental effects of such a connection and this will be reported in the ES. At this stage

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it is not envisaged that the proposed development would require a significant upgrade to current utilities provision in the locality.

**Waste**

- 4.11.8** The Project is inherently concerned with waste management, with the utility of residual waste materials being maximised at every stage. The ES will however clarify the types of waste to be processed and the effect of the proposed development on waste will be reported in the ES.
- 4.11.9** The construction of the RRF would require the preparation and implementation of a Site Waste Management Plan (SWMP), the purpose of which is, among other things, to ensure as far as is reasonably practical that waste is re-used, recycled or recovered and to generally increase resource efficiency.

**Impact Interactions & Cumulative Effects**

- 4.11.10** The 2009 EIA Regulations require the EIA to assess the potential for impact interactions and cumulative effects. The assessment will include the interactions of different environmental effects on the same receptor (e.g. a dwelling affected by both noise and air emissions) as well as the aggregate impact of the RRF and other developments planned in the local areas (e.g. the economic benefits of housing sited in the vicinity of a development to create new employment opportunities).
- 4.11.11** Relevant major local developments have been incorporated into the environmental baseline that is being assessed. This allows the cumulative effects of the RRF to be assessed cumulatively with other major local developments and mitigation identified as appropriate.

## **5 Summary & Next Steps**

### **5.1 Summary**

**5.1.1** This Non-Technical Summary and the PER have been prepared to provide consultees, stakeholders and the public with an up-to-date report on the progress of the EIA and the environmental information as it is emerging prior to the application.

**5.1.2** Covanta welcomes comments on this document, the interim findings, and the environmental work that has been undertaken to date (including methodologies adopted). Comments received will be considered in relation to both the emerging design of the Project and the EIA process. Details on how to comment are set out in the Foreword at the front of this document.

**5.1.3** Please note that your representations will be made public. Copies of your representations will be placed upon publicly available deposit. Your views are likely to be recorded or paraphrased in the Consultation Report that must accompany the application for the DCO.

### **5.2 Next Steps**

**5.2.1** All comments received on this document and through the consultation process will be considered by the project team and incorporated into the proposed development and the EIA process, where appropriate.

**5.2.2** Final assessments will then be completed and the application documents, including the ES, prepared. Subject to the responses received through the consultation exercise it is anticipated that the application for the Project will be submitted to the IPC in April 2010.

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**FIGURES**