

Rookery South CLP Meeting 16 - Notes
Monday 11th Jan 2021 – 6.30 pm
via Zoom

Present

CLP Members – Representatives from Marston Moretaine PC; Brogborough PC; Millbrook PM; Wootton PC; Marston Vale Trust; Lidlington PC; Lidlington Resident; Houghton Conquest PC; Cranfield PC; , BACI; Cllr. Sue Clark (SC)

Observers/Presenters – Covanta/Rookery South Ltd: Judith Harper (JH), Neil Grimstone (NG), David Spencer (DS), Jack Stitt (JS), Ian Judd (IJ), Ian Morrish (IM); Environment Agency: Emma d’Avilar (Ed’A); Neil Goudie (NGd); CBC: Anita Taylor (AT); Veolia – Marine Avisse (MA); Jacob Hall (JaH)

Facilitator: Bob Fisher (rmpfisher77@gmail.com)

Apologies for Absence: Cllr Tim Hill; Roy Romans (CBC); Jon Shortland;

Stewartby PC unable to gain access to the meeting

NOTES FROM THE MEETING

- Participants were reminded of the set of ground rules originally agreed by meeting participants:
 - Keep to time
 - Keep to the agenda
 - Respect each other’s views
 - Turn-taking - Do not speak over one another
 - Mobile phones turned off/turned to silent
- In addition, protocols for conducting meetings via Zoom were reiterated:
 - Microphones muted & cameras turned off
 - Raise hand & use Chat mode
 - Permission to record the meeting for notation purposes
 - No recording by attendees, please
- **Approval of notes from meeting 15**

The notes had been circulated in advance of the meeting. No comments re accuracy were raised.

Matters arising from previous meeting (29/09/2020)

BACI rep raised earlier questions about the carbon footprint and whether JS might respond during the Construction Update. BF noted that these questions had been recorded and passed on to Covanta on previous occasions and have been forwarded again this evening.

- **Construction & Traffic Management Update – Jack Stitt (JS)**

Construction update – Jack Stitt (Slides 6-20)

JS summarised the progress on construction since the last meeting in September (see Construction Update slide detailing COVID 19 measures, removal of tower cranes, extensive progress on steelwork, process installation, cladding, Turbine Hall, Bunker and Boiler Hall, roofs – including the green roof – and Admin Building).

In terms of workforce, from a peak of around 900 persons on site per day, this is now around 600 persons and numbers are on a decreasing trend.

Aerial photos from September and December illustrated the progress made in construction over this period.

With regard to off-site works, JS commented on work done on the grid connection on Green Lane, which is now completed, works by Anglia Water – also on Green Lane – and by Network Rail (see slides 9-10) re Off-site Works). JS commented that the facility was now able to import and export electricity when commissioning starts and the turbine is synchronised, later this year.

Currently, the main offsite works which may affect people are improvements to the junction of Green Lane and Bedford Road (C94). These works started on 04/01/2021 and will continue throughout January, with 3-way traffic lights in operation for the duration. Following this work, the junction is expected to be more user-friendly.

JS then outlined the plan for the next 3 months, which prioritises completion of construction (see slide 11-Month Look-ahead), electrical installation – including cable-pulling and lighting – in preparation for cold commissioning.

JS also noted the challenges presented by the COVID-19 pandemic and highlighted the range of measures implemented by Rookery South Ltd (RSL) to comply with current UK government guidelines, which encourage continuing work on construction sites. These measures are outlined on the slide – COVID-19 Management & Action Plan. One addition in the last quarter of 2020 was the installation of misting booths, in which temperatures are taken and then an anti-viral mist is applied to people as they enter the site. JS commented that 1.5 million hours – which represents 75% of the time worked on the project – have been worked during COVID-19 restrictions and very few cases have been reported among the workforce.

JS then went on to cover extension of working hours, as outlined by the Development Consent Order (DCO). (See slide 14). Permission for these extended working hours was granted by CBC on 18/12/2020. These extended hours are necessary due to lost time on one specific piece of equipment which was affected by COVID restrictions – issues relating to the delivery of this equipment from Belgium and also availability of labour. In addition, some welding work will take place overnight; however, this work is not inherently noisy and will take place inside a structure, so no disruption is anticipated. It is hoped that this will be the last of the out-of-hours working which needs to be carried out.

Moving on to Commissioning, JS commented that the plant was soon to enter a number of phases to test the equipment (slide 15).

The commissioning plan was submitted to the EA in December 2020. In particular, JS pointed out that many things seen or heard (e.g. tests, scenarios) during commissioning are not likely to happen during normal operations. He also emphasised that RSL would be sending out a letter drop to the local community, which will go into more detail of what will happen and when in terms of commissioning, and explained the details.

Cold Commissioning is the first phase (see slide 16– Cold Commissioning). This phase prepares the ground for Hot Commissioning, (see slide 17 – Hot Commissioning), which includes the steam blow in April. Further details of the steam blow were given to highlight some of the features of this process. (See slide 18). JS noted that the Planning authorities need to be informed of this with 3 days' notice. and stated that records of steam blowing would be kept.

On successful completion of Cold and Hot Commissioning, the plant will then move into a Reliability Run, which is essentially a trial run to demonstrate that everything is operating as expected. (see slide 19 - Operational Reliability Testing).

JS then went on to note that RSL will be deploying an Operational Signage scheme locally to proactively direct vehicles to the site. He acknowledged that there had been some stray deliveries during construction, so RSL had developed a signage strategy with an engineering consultant, which highlights a series of signs in accordance with approved HGV routes. The scheme is currently under review by CBC (see slide 20 – Operational Highway Signage Scheme) and, once approved, will be implemented.

Q: Lidlington PC asked whether Brexit would affect the project in any way.

JS felt that it might potentially have an effect. The company has been preparing for Brexit for some time, as there are a number of contractors from mainland Europe working on the site. To date, there had been no effects; RSL has managed to get the appropriate paperwork in place and there have been no issues at the borders. There has, however, been an increase in questions at the border, but these are generally answered straightaway.

Q: Wootton PC asked whether emissions data during commissioning will be published.

JS noted that such data is certainly published during the operational phase and will be available via the Covanta website. However, he would need to check and provide an answer to this question following the meeting with regard to commissioning data.

Q: Brogborough PC asked whether the slides for JS's presentation would be circulated to the CLP.

DS confirmed that they would be available between 36 and 48 hours following the meeting.

Q: BACI Rep asked what was the total number of man hours.

JS stated that, at the close of 2020, the total was 2 million hours; toward the end of the year, it had been between 180,000 and 220,000 hours per month.

[There were then a series of questions from BACI Rep relating to cable, concrete, steel, tarmac, fuel, electricity and cladding, which would take some time to address. BF confirmed that he had sent a recent e-mail from BACI listing these same questions to Covanta. Unless someone from the company suggested otherwise, BF felt that these matters would need to be addressed following the meeting. JS and DS agreed that, on receipt of the email, the company can address these issues offline and then respond]. Post Meeting Note: these are the same questions that were raised following the meeting in June 2020. RSL had provided a 'Questions and Answers' sheet responding to these questions which was circulated on 26/09/2020.

[JS then handed over to IJ, Facility Manager]

Operational Readiness

IJ focussed on key areas of mobilisation, including recruitment, training, procurement, environmental management and safety rules. Covanta is currently engaged in final recruitment activities, onboarding and training (see slide #22). IJ noted that there was a very comprehensive HZI/Covanta training programme and accreditation to ensure all operators were competent and credible, in line with industry best practice – and also Covanta's own rules and policies. This period of training will run to the end of the year, in readiness for commercial operations.

Covanta is also scoping out the first waste deliveries with Veolia and HZI to understand how to deal with waste delivered on site, how to get it into the Bunker and deal with any residues (e.g. incinerator bottom ash) – and how to get this off-site. While IJ acknowledged that this can be quite a complex process, there is experience on the team in dealing with first deliveries of waste on a new-build facility. Covanta was also looking at HZI/Operations and Management interface to support and learn from these commissioning activities as these systems and processes are brought online. Following this, IJ also noted future initiatives, including engagement with UK training service providers and local employment plan commitments, as well as Safety and Environmental Management systems and assessments (see slide).

IJ then commented on team roles which had been recruited so far, along with ongoing recruitment (see slide 23– Operations Team – Recruitment for details). He expressed satisfaction with quality and character of the team, especially given the challenging circumstances around the recruitment period. He gave as an example the recruitment of Shift Plant Operator roles who were experienced in working in EFW facilities and who have directly transferable skills, which sets the company up for the future in terms of competencies. IJ explained the difference between Assistant Plant Operators and Shift Plant Operators is that the latter can cover both roles, while the former monitors the plant from outside the Control Room. In addition, IJ noted that Covanta had recruited a very experienced Day Team Leader, who is used to managing large volumes of site traffic, management of the Tipping Hall and IBA.

IJ then commented on the recruitment for the Maintenance Team (see slide 24), noting their experience. Covanta are currently in the process of recruiting Mechanical Maintenance

and EC & I Technicians and IJ noted that it may take some time to recruit sufficiently qualified and experienced people for these roles.

To get through the next 12 months, however, Covanta has appointed an Environmental Consultant – Kirsteen Harrison – to provide support during transition between the different phases in commissioning and operational readiness. Kirsteen is very experienced in EFW and will be active in policing Environmental Permit requirements, as the plant hits Hot Commissioning and, again, IJ considered this to be a very positive appointment.

IJ went on to summarise some key dates and milestones (see slide 26– Key Dates & Milestones).

Q: Marston Moretaine PC asked whether the theoretical dispersal model will be updated with weather data measured at stack top.

IJ did not have the answer to this question to hand and would therefore need to provide a conclusive answer at a later date.

Veolia – Waste Delivery Update – Jacob Hall & Marine Avisse

As mentioned earlier, first waste deliveries will commence in mid-May during the commissioning testing period. (See slide 28 - Fuel Requirement). On top of Local Authority (LA) volumes, Veolia will also be providing any extra material needed for the plant (see Sources of Fuel slide 29 for detail). Veolia will be applying a 'proximity principle', whereby local Waste Transfer Stations (WTS) such as at Northampton or St Albans will be prioritised. The intention of this is to reduce the mileage involved. JaH showed a slide indicating the various Veolia WTS in relation to the RS plant.

JaH noted that deliveries will take place using two types of vehicle – see slide 31. Artics can carry up to 3-4 times the amount of waste compared with RCVs, which therefore requires fewer journeys. JaH expected a low volume of waste deliveries to begin with, in line with the commissioning timeline – around 30-40 starting in May, increasing to approx. 200 in June/July and 200-300 from July to February. JaH stressed that one vehicle movement meant one movement in and another movement out of the site, so at the peak of deliveries, this is expected to be between 100 and 150 waste vehicles per day.

Q: Wootton PC noted that the Veolia catchment area clearly exceeds the 60-mile radius previously quoted and asked whether this fact damaged Veolia's credibility.

JaH felt this was not the case. The majority of the vehicle movements will be within this 60-mile radius. Veolia have included anything above that radius purely to give the company extra security to keep the plant fuelled. He maintained that the company was certainly committed to keeping deliveries as local as possible.

MA added that – if this query related to the Norfolk contract – the key priority for Veolia is to avoid landfilling the waste so, although it may seem quite far away from the facility, it is much more beneficial to bring it to an EFW plant than a landfill.

Q: Cranfield PC asked how long the Council contracts were for; when these run out; and whether it were possible that waste from replacement contracts could be from much further afield, thereby reducing efficiency.

JaH responded by saying that all the Council contracts signed up to were long term (5+ years) and Veolia would not look further afield, but rather maximise deliveries within the local distance and either try to renew these contracts or look within the local area for replacements.

MA added that Veolia can provide tenure of the contracts through the notes and most of these have quite lengthy extensions – any renewal would not be short-term.

Q: Lidlington Resident asked whether there was anything further to note on the Routeing Strategy.

JaH confirmed that Veolia would be working with Covanta on road signs and will also be providing route maps. Before any driver is allowed to deliver to the plant, they will be given a site induction, which will also include a full route plan of how to access the facility correctly.

[At this point SC left the meeting]

Environment Agency – Emissions Overview – Emma d’Avila & Neil Goudie

Ed’A presented an overview covering the potential health impact from emissions and changes to recent legislations and how these affect the permit. She had noted questions on the agenda relating to CO2 but suggested that these might be picked up at the next meeting. Ed’A first outlined the main role and function of the Environment Agency (EA) (slide 35).

Ed’A then went on to summarise broadly the main sources of pollution – both man-made and naturally occurring. Subsequent slides illustrated the extent to which industry overall contributes to pollution, particularly in terms of NOx, particulate matter and SO2. Data were presented which showed an improving picture in terms of UK national emissions since 1990, due in large part to the move away from fossil fuels and coal burning plants. (slides 36-38)

Ed’A noted that the EA is satisfied that Covanta is able to operate Rookery South ERF according to the best available techniques. Pollutants were assessed according to a full air dispersion model at the application stage and the Agency agreed that these pollutants would be screened out to below any environmental standards levels likely to cause any human or environmental receptor to be impacted by the plant. Ed’A added a statement from PHE stating that such wastes incinerators do not present a significant risk to public health (see slide 39 – Public Health England).

Ed’A then commented on the general effects, of certain key pollutants, such as NOx, for CLP participants to disseminate this information to the communities they represent (see slides 40-43 – NOx, SO2, Volatile Compounds & Particulate Matter).

Ed'A then considered if limits on emissions were changed in any way, what the likely impacts might be (see slide 44 – Changes in Legislation). This was essentially an introduction to the mechanisms by which improving emissions standards are implemented into permits the stated aim of continually driving up standards.

There then followed a number of questions from CLP members which reflected general concern over the general coverage of the update.

Q: Wootton PC asked how the EA would react to new PHE advice to cut permitted emissions – with a particular view to emissions near the plant and around Marston Vale.

Ed'A commented that this had already been implemented, as the BAT (Best Available Techniques) reference document (the 'BREF') issued in December 2020 – there is already a cut in emissions; the site would have four years to be able to reduce their emissions to meet these limits. For example, NO_x has been reduced from 200 to 180; dust and particulate matter has already been reduced. She felt that this mechanism was already in play.

Q: Wootton PC asked, having left the EU are we able to move to lower emissions levels and what impact lower emissions levels are likely to have on Covanta.

Ed'A stated that lower emissions levels have already been incorporated within the EU Withdrawal Agreement – [the UK] would mirror and stay aligned to limits set by the European Commission. She envisaged keeping in line with these mechanisms of continuing to lower emissions. With regard to Covanta, Ed'A felt that any new plant with new technology would easily be able to meet these lower emissions levels.

Q: Houghton PC wished to know, with regard to Covid-19, what action the EA were taking to understand how emissions from the plant might exacerbate the health impacts from the current pandemic.

Ed'A reiterated that the EA was not a human health-based organisation; this would be down to PHE or other health authorities.

Q: Lidlington Resident requested clarification from the EA about the likely impact of emissions from the plant on those living nearby.

Ed'A apologised and reiterated that [human health] was not within the EA's competency or expertise, but rather their focus was on environmental concerns.

Q: Cranfield PC commented on the recent inquest into the death of 9-year-old Ella Kissi-Debrah, which was linked officially to exposure to air pollution. In the light of this finding, he wished to know whether these "acceptable" levels of toxins are likely to be reduced.

Ed'A responded by noting that air pollution comes in many different guises. While this was not her area of expertise, she believed that emissions from these plants were continually being driven down.

NGd added that the unfortunate death of this child and the resulting inquest finding has focussed attention. Low-level emissions from car exhausts and lack of dispersion are completely different from those being dispersed from a high-level stack. He added,

however, that the EA is always looking at its policies and working with health professionals to see if the limits remain valid. When these need to be tightened up, the EA tightens them up.

Adding to what Ed'A had said earlier, NGd stated that the permits have been set to limit the impacts from a number of emissions to an acceptable level, but there will always be a very, very small percentage of the population who may be susceptible to these and clearly – under Covid 19 – this proportion has probably gone up. However, a response to any queries on that has to come from health professionals on any symptoms which may appear. He stressed, though, that the permits have been set very conservatively.

BF noted that there were several? questions from CLP members [on the Chat] on the theme of how/whether the EA was consulting with health experts, particularly from Houghton PC and Lidlington Resident and asked the EA to confirm whether the competent/relevant authority to address these concerns was PHE.

NGd confirmed that PHE was the competent authority but, with regard to the question about Covid-19, there have been various COBRA meetings at government level, that the EA is represented at this level and there is an exchange of thoughts and ideas on possible impacts. Occasionally, notes are passed down by environmental business colleagues but as yet this has not been highlighted as an issue.

BF asked whether the EA had been consulting with PHE with regard to Covid-19.

NGd felt that there were two aspects to this. First, the EA consults with PHE during the permitting process and - not at a local level – there will also be higher, national-level, discussions about Covid-19 and air quality.

In order to be able to cover the remaining items on the agenda, BF noted that a high volume of questions remained on the serious issue of health impacts from emissions and suggested at this point that CLP participants email these questions and that he would pass these on to NGd and Ed'A for a more detailed response following this meeting.

Local Authority Monitoring – Anita Taylor

AT wished first to clarify something from the recent newsletter. She felt that the interaction between Covanta and the LA regarding the design stage of the plant was not wholly accurate. The newsletter touched on the fact that the LA had had some input into the design of the plant, which was not the case. In written representations relating to the application the LA had made it clear that they had had no input in the evolution of the design and stated that the facility would be 'highly intrusive in the landscape'.

In response, DS felt that the newsletter was referring to the design of the stack and the overall look of the building and that this was part of a consultation with a number of statutory bodies, including BBC and CBC.

AT agreed that that had been part of the consultation, but that the input from the LA had not been conducive to the end design. It therefore seemed as if certain comments about the design had been taken from other organisations and put into the design, but it would not be

fair or accurate to say that the design was supported by the LA. It was clear from all the evidence that was submitted for the DCO process that they had some concerns about the design of the facility and, whilst the justification for this was to reflect the historic industry in the area, the local feeling was that there was not much point relocating a history if local people were not especially concerned about being reminded of this history. AT just wished to make this point because she felt this hadn't been put across in the newsletter.

DS acknowledged this.

In her report, AT noted that since September, the LA had carried out a site visit and a more structured monitoring visit, in which they went through all the requirements in the DCO. That visit took place on 26/11/2020 and did not raise any significant issues. There are still some outstanding issues relating to landscaping and the Rights of Way (ROW) Strategy and some amendments to the Green Lane Visibility and foul water drainage on site. However, the latter are amendments which are required following modifications during the construction phase. The LA has given a number of approvals since the last meeting in September, the first of which was mentioned by JS earlier, relating to the extension of working hours, given on 18/12/2020, for limited and specific operations. AT also noted the Lighting Scheme was approved on 12/11/2020 and this had been with the LA for some time prior to its approval. Both the Local Employment Scheme [Annual Report] and the draft Signage Strategy are currently with the AT at the Council for approval.

Rights of Way (ROW) Strategy (Judith Harper)

JIH briefly covered the current situation regarding ROW. (Slide 47). JH noted that the permissive paths are for local usage and have never been actual rights of way. JIH explained that the ROW Strategy is one of the Section 106 requirements; a draft strategy is part of the planning permission and then the final updated strategy has to be approved by the Council and is going through this process at the moment. The Strategy sets out what RSL will do in terms of setting out footpaths, as shown in the slide 48 – ROW Strategy. In order to reinstate those footpaths, once the Council has been notified, it will go out and check that everything meets the specifications within the ROW Strategy and then the ROW Officers add it to their definitive map and it reverts back to being a right of way.

JH added that the Review of Mineral Permission (ROMP) provides for upgrades of some of the footpaths to cycleways, which is an agreement between the Council and Covanta/RSL and the landowners, O&H Properties. The DCO does not make any provision for bridleways but Covanta has agreed to make the specification to include a wider green verge to allow for adequate space for access by horses. The map shows where these footpaths will be reinstated to bridleways and footways.

Site Visits – RS and other facilities (Jack Stitt)

JS commented briefly that, as soon as it is possible to offer a site visit for CLP members, the company will do so, once Covid-19 restrictions have been removed.

Stakeholder & Local Engagement (David Spencer)

Beginning with the newsletter, DS noted that all CLP members had received early copies of this and he assumed that most had also received hard copies. DS pointed out that circulation for the most recent newsletter had been increased – so far, it has reached 10,566 households, up from 9,995. In addition, following a request at the last CLP meeting, DS had ensured that an E-edition had gone out to around 14 town and parish councils in the Marston Vale area, including Ampthill. There had also been a request at Meeting 15 for a continuation of hard copies of Rookery South News. DS was happy for print editions to continue until the end of the construction phase, whereupon it will revert to an E-edition format.

Other updates included recent contact with neighbours (slide 51)

DS also stated that RSL are keen to work with HZI to ensure that any works which may impact on near neighbours and communities will be communicated in advance.

With regard to the first stage of recruitment advertising outlined by IJ earlier, DS noted that this is now in place and, to support this, adverts have been placed in a number of local newspapers, as well as the Milton Keynes Advertiser. This first phase has been underpinned by a media release and this has been picked up by all the papers carrying the adverts. RSL is also moving to the next phase, which covers roles highlighted earlier by IJ.

DS noted that the August-November film showing progress on the site will be available soon on the RSL website (see slide 52 for weblink).

Finally, DS highlighted the support by RSL for a local charity – the SMART Prebend Street Centre. For the third consecutive year, a donation had been made to this organisation, which looks after some of the most vulnerable people in the Bedford/Bedfordshire area.

Q: Lidlington PC asked whether the CBC email address on the newsletter was correct and pointed out an error on the printed version of the newsletter.

DS undertook to have this corrected on the E-edition asap, within the next 48 hours; the email address should be: mwapplications@centralbedfordshire.gov.org.

BF drew the meeting to a close, noting that one or two participants had had problems joining the meeting (Stewartby PC and Lidlington Resident) and apologised for this.

BF also noted that there were a number of questions relating to the health effects of emissions which CLP members felt had not been adequately addressed and reiterated that these questions [on Zoom Chat] will be sent to the EA to follow up, as these were matters of considerable concern.

Q: Wootton PC asked whether the E-edition of the newsletter would withdraw the mention of CBC approval of the design of the plant (as highlighted earlier by AT).

DS said that he would like to speak to colleagues before providing an answer.

AT offered to forward the relevant pieces of the LA's representations to see the views of BBC and CBC, which were both aligned on this issue.

DS thanked AT for this offer.

Other Business

BF noted that there had been a request from Stephen Sleight, of the Marston Vale Community Rail Partnership to join the CLP. There were no objections to this.

Agenda Items for Meeting 17

BF asked members to email him with any items for the next meeting.

Date of Next Meeting

19th or 26th April 2021 (TBC)