

To  
The Environment Agency

4<sup>th</sup> November 2017

Dear Sir/Madam

**Consultation: Covanta Energy Limited EPR/WP3234DY/A001: Environmental permit draft decision**

We are responding to the above draft decision as follows:

**1. The issue of “temperature inversion” in the Marston Vale and the creation of pollution “smogs”.**

We are extremely disappointed that the Environment Agency (EA) has refused to conduct a detailed investigation and independent modelling into the above issue. This despite there being very strong evidence that the phenomena had resulted in regular and severe episodes of air pollution locally during the time when the brickworks were in operation in the area.

At this time, “temperature inversions” created very high levels of pollution as far away as Bedford and in the villages further to the north of Bedford. Similar regularly occurring pollution episodes affected the town of Ampthill and other settlements at a similar radius to the brickworks.

Since then “ambient” air pollution levels in the area have increased dramatically and regularly come near to and exceeded EU maximum levels.

Temperature inversions could prevent the effective dispersion of a range of highly dangerous emissions from the incinerator thereby increasing concentrations locally.

**The EA should take a precautionary view on this matter** and ensure that detailed modelling of “temperature inversion” is undertaken before any Environmental Permit is issued.

This modelling should include more realistic estimates of current and future ambient pollution levels.

Air quality measurements should be taken at a larger number of locations locally, particularly near to the M1 and A421 corridors and estimates made of the likely increases due to the number of HGV movements taking waste to the incinerator site.

**The EA has a duty to the public to ensure that all potential risks to health have been properly and comprehensively assessed. It would be irresponsible to do otherwise.**

- 2. The proposed permit does not encourage the applicant to separate waste streams and minimise the inclusion of recyclable material from the commercial waste it intends to “feed” the incinerator.**

The EA has stated in the response to our earlier comments on this issue that it is not the role of the EA to encourage businesses to separate and recycle their commercial waste and that this is the role of legislation.

We disagree fundamentally with this position.

It is government policy and should therefore also be the policy of the EA that everyone, businesses included, throughout the waste “chain” should do everything possible to **“prevent, reuse, recycle or recover”** waste.

The applicant has stated that they will be using commercial waste to feed the incinerator. Commercial waste is known to have relatively low rates of separation (i.e. recyclable and non-recyclable) when collected. The applicant is doing this because the calorific value of the waste is much higher than waste that does not contain recyclable material.

This improves the viability of the incineration process.

It is the role of the EA to ensure that government policy on “waste segregation at source” is followed.

**This means requiring that wherever possible, the applicant prevents recyclable material from entering the waste stream before it is taken to incineration. Anything less would be contrary to government policy.**

**We look forward to the EA implementing government policy.**

Yours sincerely

Gerry Sansom  
CPRE Bedfordshire