

The Campaign to Protect Rural England (CPRE) Bedfordshire branch seeks the continuing restoration of the Marston Vale for amenity, nature and leisure and opposes its reindustrialisation. Accordingly, we have fundamental concerns about the impact of the Covanta proposals in the Marston Vale area of Central Bedfordshire Council (CBC) and wish to formally **object** on the following grounds:

The development would be a prominent industrial feature jeopardising the restoration of an attractive and historic clay vale. It will be visible from great distances in all directions and will fail to '*conserve the open character of the Vale*', as well as detracting from the setting of the listed Stewartby Chimney Stacks as a '*landmark feature*', both requirements set out in CBC's Landscape Character Assessment. Whilst it is acknowledged that visual mitigation has been attempted, we do not consider it possible to sensitively integrate a development of this scale into the vale area. The proposal should be deemed unacceptable when assessed against the relevant landscape and heritage policies of the CBC Core Strategy and Development Management Policies (CSDMP) document, and additionally PPS5 in respect of the chimneys.

The development is stated to generate 718 HGV movements per day (although CPRE considers that this figure may prove to be a conservative estimate). CPRE is concerned that such an increase in traffic along the road between the site and the A421 will prejudice highway safety and impact on the local environment by way of fumes, dust and noise, to the detriment of local residential properties and the rural area. To this end, the proposal is contrary to Policies DM1 (in the instance that it is accepted by the IPC that this is a 'renewable energy' proposal) and DM3 of the CSDMP. Additionally, it is a concern of CPRE that the HGV traffic will have an urbanising influence on the vale and would be contrary to policy DM14.

CPRE remains to be convinced that the proposal would not have an adverse effect on local ecology, habitats and air quality. The pit hosts amphibious reptiles and migratory birds and it is a concern that the approved Low Level Restoration Strategy (LLRS) will not be implemented as part of the Covanta proposals. An industrial development of this scale will almost definitely have a negative impact on locally sensitive receptors and should be deemed as being contrary to Policy CS18 of the CSDMP.

Additionally, CPRE reserves the right to object on the following grounds as relevant:

- Impact on the waste hierarchy and non-compliance with PPS1 and PPS10 (similar to the reason to refuse Covanta's recent proposal in Middlewich, Cheshire);
- Negative impact of the proposal on sustainable travel patterns, contrary to PPS1, PPS10 and PPG13, as well as relevant policies within the development plan; and
- The prematurity of the proposal, in light of CBC's ongoing competitive bidding process for a suitable waste management facility in the county, and the resultant lack of rigorous assessment in the way in which the heat and power generated will be distributed.