



Ray Williams  
Area Planning Manager West  
Plymouth City Council  
Plymouth  
PL1 2AA

Our Ref: D123356

Your Ref:

Date: 8 July 2010

Dear Mr Williams

**MVV Umwelt  
Energy from Waste Combined Heat and Power Facility, North Yard, Devonport  
EIA Scoping Report**

We are writing on behalf of our client MVV Umwelt GmbH. Further to the submission of our EIA Scoping Report for the above project, enclosed with a letter dated 21 June 2010, we are writing to provide clarifications in two subject areas.

Flood Risk

Paragraphs 5.6.5 to 5.6.7 of the Scoping Report state:

*"..... The majority of the site is located within Flood Zone 1. The majority of the site is therefore not at significant risk of coastal or fluvial (river) flooding. However, it is possible that the lower ground around the proposed bridge is located within Flood Zone 2/3. Therefore, there is potential for flood risk at the access due to its level.*

*The existing crossings of Weston Mill Creek lie at between 5m AOD and 6m AOD (a topographic survey has been undertaken and detailed data are available)..... Tidal still water levels during the 1 in 200 year event for Devonport have been sourced from the South West Region Extreme Tide Level Report<sup>1</sup>. A comparison of ground levels across the site with the 1 in 200 year tidal still water level (3.68 m AOD) indicates that the site is currently above this flood level.*

*The anticipated effects of climate change on sea level rise (up to 2070), as stated within PPS25, indicate that the future 1 in 200 year tidal still water level is expected to increase to 4.17 m AOD for the Devonport area....."*

The Environment Agency Flood Map was reproduced on page 34 of the Scoping Report. At this scale of mapping it is difficult to determine whether parts of the site may fall within flood zones 2/3, hence our statement in paragraph 5.6.5 of the Scoping Report. However, since the submission of the Scoping Report we have reconsidered this matter. The topographic survey of the site, a copy of which is enclosed with this letter, shows that all parts of the site on which there will be development, including the proposed bridge, will be above the 4.17 m AOD level. We are therefore writing to express our considered opinion that the site falls within flood zone 1.

Notwithstanding this, we do of course still intend to undertake a Flood Risk Assessment and submit this with the planning application in due course.

<sup>1</sup> Environment Agency (2003) South West Region Extreme Tide Level Report– Information on predicted tide levels for extreme events.  
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Air Quality

Paragraph 5.8.28 of the Scoping Report states:

*"The diffusion tube baseline monitoring programme will take place over a period of one year, in order to adequately assess seasonal changes in baseline concentrations and periods of adverse meteorological conditions."*

All other references within the Scoping Report to air quality monitoring refer to durations of nine months. Paragraph 5.8.28 should also have referred to a duration of nine months so we are writing to correct this.

We also wish to clarify how we intend to use the monitored data in our modeling and assessment of air quality impacts. Although we have programmed to undertake a nine month survey overall, commencing July 2010, the programme to prepare the planning application requires us to model and assess the impacts using the first six months of monitoring data. It is our considered view that six months of monitoring data, starting in July 2010, would cover an equal number of summer and winter months and would be representative of baseline conditions sufficient for a robust assessment. The entire nine month dataset would be submitted to support the planning application at the earliest opportunity following completion of the survey. Our Senior Air Quality Consultant Danny Duce has discussed and agreed this approach with your Senior Environmental Protection Officer, Graham Hooper. Danny and Graham have also had useful discussions about the locations of diffusion tubes and dispersion modeling software, which we assume will form part of your Scoping Opinion in due course.

Yours sincerely  
for **Scott Wilson Ltd**

A handwritten signature in black ink, appearing to read "Ian Roach".

**Ian Roach**  
Principal Environmental Consultant

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