

**Scoping Opinion, Energy from Waste Combined Heat & Power Facility -  
North Yard, Devonport. (10/01010/ESR10  
Additional information required and Responses to Consultations -**

Source	Issues to scope	Date of Response
PCC Planning Services – (Development Management Unit)	<ul style="list-style-type: none"> <li>• a full analysis of the rationale for the choice of an Energy from Waste plant to dispose of residual waste</li> <li>• An analysis of the strategic and local implications for the operation of the Dockyard and MOD facility and for local employment.</li> <li>• An assessment of the need for renewable energy for use at premises close to the site.</li> <li>• An assessment of the need for secondary aggregates and metal recovery.</li> <li>• the rationale for the choice of site over others ( taking into account the environmental effects )</li> <li>• full details of the scale, scope and operation of the Community area to be provided,</li> <li>• Full details of the proposed storage and treatment and likely transportation arrangements for the bottom ash.</li> <li>• full details of the environmental impacts arising from the demolition and construction of new bridges and a new access road and the implications for neighbouring land uses arising from the loss or relocation of existing car parking areas and access routes and details of the impact upon the Weston Mill Viaduct.</li> <li>• Full details of the proposed plant, buildings and structures associated with site generated energy including the environmental impacts arising from plant required for connecting into the electricity grid including the impacts of the routing of any overhead power lines and the details of any impacts upon the Weston Mill</li> </ul>	27/07/10

	<p>Viaduct and measures envisaged to reduce adverse effects.</p> <ul style="list-style-type: none"> <li>• full details of the environmental impacts arising from on-site storage areas, bunkers and containers and the security fencing , gates and site controls needed to prevent fly-tipping outside delivery hours.</li> <li>• A Zone of Visual Influence needs to be defined with a full appraisal of likely visual impacts of the development upon the locality – during night-time and daylight hours – (including from public vantage points across the Hamoaze within the Tamar Valley AONB, Antony House parkland and Wilcove Lane and hamlet.)</li> <li>• Assessment of the implications for the local population of any change in air quality resulting from the proposed development and local meteorological conditions.</li> <li>• A BS: 5837 Tree survey will be required to be submitted for the Environmental Statement indicating which trees it is proposed to remove/replace and which to retain. The impact upon some semi-mature trees along the northern edge of the current car park in the area proposed for a new road access needs to be assessed as does the extent of the impact of the development on ‘Blackies’ woodland (which is a landscape feature for a wide area of St Budeaux and Barne Barton and particularly visible to train passengers).</li> <li>• The proposed Historic Environment element of the EIA appears adequate.</li> </ul>	<p>14/07/10</p> <p>13/07/10</p>
<p>PCC Planning Services – (Development Planning Unit )</p>	<p>The additional issues to scope should be a positive response to the following comments which are in respect of specific sections of the submitted EIA Scoping Report :</p>	<p>16/07/10</p>

**2.3 Planning Policy Status & Table 2.1 criteria for judging Plymouths DPD waste policy** - clarification needed of the extent of the site that is previously developed land as Table 2.1 differs from 5.2.12. The extent of the main building and its car park. Needs determining together with the extent of any clearance of the edge of Blackies Wood.

**3.5.5 Bridges** - The extent of mitigation measures needs to be assessed for the demolition of the two bridge crossings and the construction of a new bridge. The impact needs to be evaluated in the EIA in a comprehensive manner --impacts likely upon Biodiversity, Land and Water Quality and for inclusion within the Appropriate Assessment for the Marine SAC.

## **5.2 Ecology**

**5.2.17** The landscaping plan should incorporate ecological enhancement features (in particular it is a policy requirement for identifying net biodiversity gain as per Core Strategy 19).

**5.2.18** The Phase 1 Survey will need to be updated to cover the entire area of the proposed development/mitigation areas.

**5.2.21** The requirement for net gain could be partially met by improving the habitat of the adjacent creek (a UK BAP habitat). A marine biotope survey would be necessary to establish a baseline level of information on which to base enhancement recommendations. (Natural England and the EA also suggest that the adjacent creek can be enhanced).

## **5.3 Landscape & Visual**

**General** - The visual impacts and changes to the landscape are not confined to the proposed building but extend to include the entire proposal (including any external bottom ash store). The EIA should indicate

	<p>how the analysis of impacts and required mitigation measures has informed the design of the EfW facility.</p> <p><b>5.3.9</b> Transient impacts to include impacts upon users of the Cornwall- Devon SW rail link both north &amp; southbound and those approaching the City using the A38 from Tamar Bridge.</p> <p><b>Figures 5 and 6-</b> The suggested coverage of visual receptors to establish a visual baseline and extent of change is inadequate for a development of this magnitude. The EA needs to cover local receptors within the surrounding neighborhoods, from vantage points in the City and from the wider sensitive landscapes, such as from points on the fringes of Dartmoor, in Cornwall AONB and at sensitive locations such as from Mount Edgecombe. (A map which identifies some of these viewpoints is available).</p> <p><b>Hydrology, Hydrogeology and Flood Risk</b>  Given the proximity to the SAC, it is vital that the EIA demonstrates mitigation measures/how contaminants will be prevented from entering the Tamar including during construction given the contaminated nature of the development site as well as from operations.</p> <p>It may also be helpful to refer to the Shoreline Management Plan 3 in order to demonstrate that the development is compatible.</p> <p><b>Air Quality</b>  Para 5.8.48 states that a qualitative assessment would be undertaken to identify activities with the potential to generate dust and then to identify appropriate mitigation measures - more information is required on the method to be used.</p> <p>The EIA also states that more monitoring and modelling of acid and nitrogen</p>	<p>19/07/2010</p>
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	<p>deposition on the Plymouth Sound and Tamar Estuaries European Marine Site will need to be undertaken. This will also be required as part of the Appropriate Assessment of the potential impacts on the European Marine Site.</p> <p><b>Noise and vibration</b>  Given the proximity to the SAC and one of its features being salmoniids, it is important to demonstrate that any noise and vibration from either the construction or the operation of the plant will not have an impact on migratory fish in order to ensure that vibrations are not transmitted through the water. How this will be assessed needs to be set out in the EIA / AA.</p>	
PCC Transportation Unit	<p>A Transport Assessment will need to be produced in accordance with DfT document 'Guidance on Transport Assessment' March 2007. All impacts of the new facility on the highway network will need to be assessed including clearly demonstrating:</p> <ul style="list-style-type: none"> <li>○ Detailed consideration of the amount of construction and operational traffic accessing the site during the peak hours and on a daily basis.</li> <li>○ Modes of transport to be used.</li> <li>○ consideration of existing waste volumes, origins and destinations of existing waste, vehicle types and loadings, traffic generation.</li> <li>○ Consideration of projected waste volumes, vehicle types, loads capacity, waste origins and resulting traffic generation.</li> <li>○ Such an assessment should include a detailed comparison of how and where waste is currently disposed of compared to how this site will operate in the future. Also consideration should be given</li> </ul>	29/8/06

	<p>to the impact resulting from the disposal of ash from the facility.</p> <ul style="list-style-type: none"><li>○ Demonstrate what is the environmental impact of the proposed facility on the wider network in terms of changes in vehicle mileage resulting from this facility – and whether the location is the most sustainable in terms of minimising the environmental impact of hgv movements. This is particularly relevant in relation to waste which is currently generated and disposed of elsewhere and which would now be brought to this facility and the additional mileage which this generates.</li><li>○ Highway capacity assessments are needed of all the junctions where significant impact on capacity occurs in particular A38/St Budeaux Bypass and Weston Mill Drive/Wolseley Road junction.</li><li>○ Demonstrate a use of up to date background traffic data, in identifying traffic generated by committed development within the Transport Assessment.</li><li>○ Provide scaled detailed drawings showing any revised highway layouts.</li><li>○ Provide details of hgv swept paths showing suitability of both internal and external access arrangements.</li><li>○ Provide details of parking arrangements.</li><li>○ Demonstrate how safe and convenient pedestrian and cycle access will be provided.</li><li>○ Provide a management plan that demonstrates suitable mitigation of highway impacts</li></ul>	
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	<p>(including identifying suitable hgv routes, wheel washing, hours of operation etc).</p> <ul style="list-style-type: none"> <li>○ Provide details of a staff travel plan to mitigate transport impacts.</li> </ul>	
HSE Nuclear Directorate	As the site is close to the area covered by the Site Emergency Plan it is necessary to assess whether the development can be incorporated into the Emergency Plan. HSE will respond further when the planning application is submitted	05/07/10  26/07/10
English Heritage	No further comments to those made in Dec 09	26/07/10
English Nature	No comments received	
Highways Agency	See attached letter	19/07/10
Environment Agency	See attached letter	19/07/10
PCC Public Protection Service	See attached memo	15/07/10
MOD Defence Estates Safeguarding	See attached letter	20/07/10

28/07/10