

Plymouth City Council
Armada Way
Plymouth
Devon
PL1 2EW

Our ref: DC/2010/106926/02-L01
Your ref: 10/01010/esr10
Date: 19 July 2010

Dear Alan

REQUEST FOR EIA SCOPING OPINION FOR THE PROPOSED ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY. NORTH YARD, DEVONPORT (SX4469557215)

I refer to the above document sent to this Agency for comment on the 29th June 2010, please see our views below.

FLOOD RISK.

We acknowledge that flood risk will be quantified and mitigation measures set out in Flood Risk Assessment (FRA). In general we accept the scope of the FRA however the joint probability of fluvial and tidal flooding should be taken into account.

We advise that combined impacts may increase flood levels around the bridge and access road, the assessment should state the resulting, hazard and frequency of flooding over the lifetime of the development. The flood extents for different return periods should be clearly identified on a survey plan.

GROUNDWATER AND CONTAMINATED LAND.

The scoping document appears to have adequately considered Groundwater and Contaminated Land aspects that will need to be addressed within the EIA. We suggest however that the applicant does not rely on the accuracy of the Environmental database search particularly in relation to licensed abstractions for the purposes of the risk assessment. A search should also be carried out to confirm the absence of any unlicensed abstractions in the vicinity.

With reference to the use of SUDS, it will be necessary to consider whether this is appropriate in relation to any contamination on site.

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We recommend that the applicant refers to the Environment Agency's Scoping Handbook and in particular Appendix L1 - "Scoping the environmental impacts of incineration".

ECOLOGY.

Clarification of the site boundary is required. The boundary of the phase 1 habitat survey does not cover the extent that is shown in figures 1 and 2. We advise that a phase 1 survey is required for the entire application area. In particular, the biodiversity value of the 'Biodiversity Network Feature' and the 'Local Greenspace Area' need to be ascertained. The report states that there will be some landtake from the edge of Blackies Wood. The value of this habitat needs to be understood so that appropriate mitigation and compensation can be incorporated.

The Weston Mill Creek is a Site of Importance for Nature Conservation (Plymouth Local Plan) which should be safeguarded throughout the construction and operational phases of the proposed development. Opportunities should be explored to improve the environment of this creek.

The inter-tidal habitat of the Weston Mill Creek incorporates mudflat habitat which is listed as a priority habitat under the UK Biodiversity Action Plan, 1994. The UK BAP recommends that there should be 'no net loss' of this habitat and the quality of the existing resource must be protected. We therefore would not support any development that encroaches onto the inter-tidal habitat.

The designated habitats, including the Tamar Estuary and the Weston Mill Creek, are all wet habitats which could potentially be at risk from contamination through surface water or groundwater pathways. We advise that there is baseline and routine water quality monitoring of surface and ground water to ensure that the designated sites of nature conservation importance are not negatively affected by contaminants during construction and during the operation of the facility.

We have fisheries data from 2002 for the Weston Mill stream at SX 457580. This was a qualitative survey and found trout fry and parr, eel, 3-spined stickleback and flounder. We advise that ecological monitoring of the Weston Mill stream and creek are incorporated in to the EIA. Ecological monitoring should include fish, invertebrates, diatoms and macrophytes and should be carried out before works start, during construction and during the operational phase of the facility. This survey work will ensure any potential negative impacts can be mitigated.

AIR QUALITY.

We will not be able to comment on the content in detail until our National Air Quality Modeling and Assessment Unit have audited the applicants Environmental Permit application air quality submission for human health and ecological habitats. We do consider the impact of the combined emissions from the stack, traffic and the dockyard should be assessed as part of any planning application.

GENERAL COMMENTS.

We recommend the following should be considered.

Use the CLAIRE code of practice to manage potentially contaminated excavation

construction waste on site before considering removing it to a landfill for disposal.

How is it intended to pre-treat commercial and industrial waste as required by the landfill directive?

The carbon footprint of the proposal.

The applicant's attention is brought to the Pollution Prevention Guidance which can be viewed via the Agency's website.

I trust the above comments are helpful, if clarification is required please do not hesitate to contact this office.

Yours faithfully

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