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Your ref: 10/01010/ESR10



Mr Alan Hartridge
Development Management Unit
Plymouth City Council Planning Services
Dept of Development and Regeneration
Civic Centre
Plymouth
PL1 2 EW

Floor 10
Renslade House
Bonhay Road
Exeter
EX4 3AW

T 0300 060 1110
F 0300 060 1120

Dear Mr Hartridge,

EIA Scoping Report for Energy from Waste CHP Facility, North Yard, Devonport

Following our correspondence on the 23rd August regarding **the EIA Scoping Report for Energy from Waste CHP Facility, North Yard, Devonport**, please find below Natural England's response. We realise the consultation period is over but nevertheless we hope these comments will be regarded.

Designated Sites

Firstly the report acknowledges, as expected the relevant statutory designated sites that are within 2km proximity of the proposed location. The report then addresses designated sites within 10km radius but only highlights European designated sites failing to acknowledge nationally important SSSI sites. Both Lynher Estuary SSSI and St Johns Lake SSSI are approximately 3km from the site and recognised for their mudflat and salt marsh system that support wintering and migratory waterfowl. Additionally it would be useful to have awareness of number sites of Local Nature Reserves and County Wildlife Sites that are in the vicinity, the majority located to the North and East of the proposed site. These are valued nature conservation sites for Plymouth and should be recognised as also having the potential to be indirectly effected by the proposal due to changes in air quality.

Ecology

Clarification of the exact site boundary is required. The phase 1 habitat survey illustrated in Figure 3 does not cover the same area as in Figure 1 and 2 illustrating the site boundary; we would expect to see a phase 1 habitat survey of the entire site.

The report indicates that there will be some land take from the edge of the Biodiversity Network Feature and Local Greenspace, known as Blackies Wood so we require an extended phase 1 habitat survey for the woods to establish the ecological value of the habitat and indicate the presence of any protected species, lichen or bryophytes. These surveys would be essential to allow appropriate mitigation and compensation to be incorporated.

We are not able to comment on the impact to breeding birds, bats and reptiles until the pending survey is completed and hope the results are included at further consultation stages.

Landscape

We would be happy to comment on landscape issues related to this application on the submission of a Landscape and Visual Impact Assessment (LVIA). Any landscape assessment should follow the Landscape Character Assessment guidance for England and Scotland (CA&SNH April 2002) and Guidelines for Landscape and Visual Impact Assessment (LVIA) (Landscape Institute and Institute of Environmental Assessment and Management 2nd edition 2002) which are considered best practice to help inform what impact the proposed development could have on the surrounding landscape.

Air Quality

In general the proposed monitoring regime appears adequate however there is no mention of monitoring for ammonia in the assessment process. If ammonia is going to be released from this facility we would require that it should be included in the scope of this assessment.

It is appreciated that the monitoring or modelling planned will show the cumulative effects for the site and Langage power station however it would be useful that for effects of the proposed Energy from Waste (EfW) plant at New England Quarry to be included. Obtaining this information would be important to determine the impact on designated sites in scope of both facilities, particularly South Dartmoor Woods SAC.

Water Quality

Natural England would require that appropriate methods are used to limit particulate discharge into the Tamar especially during the construction phase which could have detrimental effects on water quality and deposition onto mudflats and salt marsh habitats. This is of particular importance as the particulates could contain contaminants as a consequence of previous industrial activities. Guidance from the Environment Agency should be sought relating to this issue.

It is not mentioned in the report but we assume that if the facility would require water for cooling of equipment that the company would consult the Environment Agency and Natural England in reference to abstraction from the River Tamar.

I hope these comments are of use.

Yours Sincerely,

Sarah Jones
Land Management & Conservation Adviser

0300 060 0857

sarah.jones@naturalengland.org.uk