

RESPONSE TO LETTERS OF REPRESENTATION Up to 11 August 2011

Category / Topic	No. letters	Response	Reference*
EMISSIONS	561		
Impact on health	173	MVV have submitted a full Health Impact Assessment. The plant will be WID compliant. The Health Protection Agency and the Environment Agency will carry out a totally independent assessment.	Health: PASS Appendix 5 Health and Well-being ES, Volume 1, Chapter 18 & appendices Reg19, D18 WID compliance: ES, Volume 1, Chapter 13 & appendices Reg19, D13
Concern about content of emissions from chimney	105	The plant will be WID compliant. The Health Protection Agency and the Environment Agency will carry out a totally independent assessment.	See above
Deterioration in air quality	95	Air Quality will be monitored by EA and PCC and there will be no offensive smells. Tipping bay roller shutter doors will be closed when not in use. Each tipping bay also has an individual chute; these will be closed when not in use. Tipping hall will operate under slight negative pressure; this will draw any odours into the plant. If there are offensive odours because of lorries queuing etc MVV will consider installing perfume sprays.	ES, Volume 1, Chapter 13 & appendices Reg19, D13 Description of tipping bay area: ES, Volume 1, Chapter 6

* PA = Planning application
PAD = Planning application drawings

PASS = Planning application supporting statement
ES = Environmental Statement

EPA = Environmental Permit Application
Reg19 = Regulation 19 Response

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EMISSIONS	561		
Emissions migration / impact at chimney level at distance	81	MVV have modelled the emissions in different weather conditions and the dispersion rates which are shown in the ES.	ES, Volume 1, Chapter 13 & appendices Reg19, D13
At high wind speed plumes may be bent. Downward loop would bring high concentrations to ground level	1	MVV have modelled the emissions in different weather conditions and the dispersion rates which are shown in the ES.	ES, Volume 1, Chapter 13 & appendices Reg19, D13
Concerns about long term effects	63	The modelling is cumulative over 25 years of operation.	ES, Volume 1, Chapter 13 & appendices Reg19, D13
Possibility of future revision of permitted levels of Nox emissions - would new development be economical?	1	The facility will be modified to comply with the Environment Permit requirements.	

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Emissions will get into food-chain via garden/ farms	20	The Health Impact Assessment models many different recipients including people who only eat locally grown food.	PASS Appendix 5 Health and Well-being ES, Volume 1, Chapter 18 & appendices Reg19, D18
What type of monitoring will be in place? / monitoring planned is flawed	13	The emissions from the plant will be continuously monitored in real time and the monitoring instrumentation is certified by the Environment Agency. The Environment Agency will make announced and unannounced inspections. The emission readings will be continuously recorded and reported to the Environment Agency. Emissions data will be published on MVV's website, making it publicly available. Calibration checks are carried out on the monitoring equipment weekly by MVV and the calibration is verified annually by an independent laboratory. The Environment Agency will undertake unannounced monitoring of the equipment on a regular basis.	ES, Volume 1, Chapter 13 & appendices Reg19, D13 ES, Volume 1, Chapter 6
General emissions pollution concerns	19	MVV have submitted a full Health Impact Assessment. The plant will be WID compliant. The Health Protection Agency and the Environment Agency will carry out a totally independently assessment.	Health: PASS Appendix 5 Health and Well-being ES, Volume 1, Chapter 18 & appendices Reg19, D18 WID compliance: ES, Volume 1, Chapter 13 & appendices Reg19, D13

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TRAFFIC	404		
Increase in traffic / congestion (local and dispersed traffic)	182	The Transport Assessment demonstrates that the proposed development will not overload the network.	ES, Volume 1, Chapter 12 and appendices Reg19, D12
Vehicle pollution	143	The Air Quality Assessment has taken into account emissions from traffic and shows that the proposed development will have a minimal impact and not breach any standards.	ES, Volume 1, Chapter 13 & appendices Reg19, D13
Car parking provision, loss of	7	The loss of car parking will contribute to the implementation of the MoD's Green Travel Plan and reduce carbon emissions.	ES, Volume 1, Chapter 6 including appendices Reg19, D12
Roads are already in bad physical condition	2	The maintenance of roads is a matter for Plymouth City Council.	-
Will add to severance (high traffic levels discourage people from walking, cycling etc)		The volume of traffic will not increase any severance and improvements to pedestrian movements across the Camel's Head junction are proposed.	ES, Volume 1, Chapter 12 including appendices Reg19, D12 PASS Appendix 8 Draft Heads of Terms

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Safety	59	The proposed development will not have any adverse safety effect.	ES, Volume 1, Chapter 12 including appendices Reg19, D12
Cumulative effect of traffic from other developments	5	The Transport Assessment has taken into account other proposed and permitted development.	ES, Volume 1, Chapter 12 including appendices Reg19, D12
Dockyard exercises impact / re- routing	6	The proposed development will have its own dedicated route from the Camels Head junction.	ES, Volume 1, Chapter 12 including appendices Reg19, D12 ES, Volume 1, Chapter 6 & appendices/ drawings

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LOCATION	497		
Proximity to residential area	178	The proposed Energy from Waste Combined Heat and Power plant will not have any adverse effect on local residents.	ES, Volume 1, Chapter 8 & appendices/ drawings Reg19, D8
Proximity to schools	116	The proposed development will not adversely affect the school or school children. The increase in traffic will have a minimal effect on air quality and increase in noise. The highest level of traffic increase will not be at times when children travel to and from school.	ES, Volume 1, Chapter 8 & appendices/ drawings Reg19, D8 ES, Volume 1, Chapter 12 and appendices Reg19, D12 ES, Volume 1, Chapter 13 & appendices Reg19, D13 ES, Volume 1, Chapter 19 & appendices/ drawings
Proximity to waterfront	2	The proposed development will not have an adverse visual impact on the waterfront,	ES, Volume 1, Chapter 8 & appendices/ drawings Reg19, D8

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Vulnerable coastal location (global warming, rising sea levels) / local flooding issues	22	The Flood Risk Assessment has taken into account the increase in water level as a consequence of climate change and the development will not be in danger of flooding even taking climate change into account.	ES, Volume 1, Chapter 11 & appendices/ drawings Reg19, D11
Geology of site unsuitable to support large structure (reclaimed tidal tributary to River Tamar)	2	Prior to submitting the application boreholes have been carried out to establish the ground conditions. The proposed development will have to meet the Building Regulations which include the structural conditions.	ES, Volume 1, Chapter 6
Valley traps emissions	36	The Air Quality analysis has taken into account the temperature inversion which occurs in areas like the Tamar valley.	ES, Volume 1, Chapter 13 & appendices Reg19, D13

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Existing use of area: Proximity to nuclear de-commissioning facility, armament depot, existing water treatment plant etc Already deal with these safety issues; our area is becoming a dumping ground	98	<p>The proposed development site has not been chosen because of the perceived bad neighbour uses which already exist or because of the socio economic characteristics of the area.</p> <p>The proposed site has been chosen because there is a high demand for heat and power (steam) from the dockyard and the plant will be able to supply this, replacing the use of fossil fuels.</p> <p>The proposed development will enhance the employment opportunities of the area and in the Dockyard whether it continues as a major employer or not.</p> <p>It will not cause offensive odours or significant increases in pollution levels.</p>	PASS Appendix 4 Energy Economy Employment & Education Benefits & Reg19, C5 ES, Volume 1, Chapter 6 & appendices Reg19, D6 ES, Volume 1, Chapter 5 & appendices Reg19, D5
The area already suffers high deprivation and low health indicators (since155)	22	The Health Risk Analysis demonstrates that the proposed development will not materially increase health risks in the area.	Health: PASS Appendix 5 Health and Well-being ES, Volume 1, Chapter 18 & appendices Reg19, D18
History of site; proximity to historic site (Kinterbury House)	2	The proposed development will not have an adverse effect on Kinterbury House.	ES, Volume 1, Chapter 9 & appendices Reg19, D9

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Asbestos on site	4	Babcock / MoD have employed a specialist contractor to clear the site of any asbestos. This local demolition contractor (Gilpins) is clearing the former Ashcroft land of asbestos. In the future, if any asbestos is found subsequently on the site it will be managed in accordance with the relevant legislation.	ES, Volume 1, Chapter 10 & appendices
Poor transport links (can't use river or rail access due to MoD base)	6	The existing highway network can accommodate the proposed traffic movements safely. It is not practical to bring waste over short distances by rail or by sea. The re-opening of the branch railway would bring the proposed development very close to residential property and introduce a new source of noise and disturbance.	ES, Volume 1, Chapter 12 and appendices Reg19, D12
Site is wrong (general)	6	The site has been evaluated against other sites in the adopted Waste Development Plan Document which was subject to public consultation and a Public Inquiry and against other allocated sites in the Plan and found to be compliant with policy.	PASS Appendix 7 Planning Policy Analysis ES, Volume 1, Chapter 5 & appendices

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APPLICATION PROCESS	222		
Impression of process "behind closed doors"; transparency	35	The procedures which have been followed have been as open to scrutiny as possible within the rules for a competitive tender process.	SWDWP: Outline Business Case (2008) & Final Business Case (2011)
Undemocratic/ PCC don't care about those affected	47	The process which has been followed has been overseen by Councillors from 3 local authorities on behalf of local residents.	SWDWP: Outline Business Case (2008) & Final Business Case (2011)
Not enough time allowed for comments	34	Plymouth City Council has continued to receive comments beyond the statutory period for people to respond and will take all representations into account in preparing their recommendation and in determining the application.	-
PCC has become a de facto "Death Panel" making decisions tantamount to ethnic cleansing	1	The City Council will follow an open and democratic decision making process.	-
Party-political interference in decision making process	2	The Planning Committee is not subject to a „political whip“and determines applications solely on their planning merits.	-

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Costings misleading	2	No misleading and confusing statements have been deliberately made in the application.	-
Location of incinerator varied in description	3	MVV have always sought to describe the location of the proposed development in a way in which the public will have no doubt as to where the development is proposed.	-
Misleading statements in MVV application	6	No misleading and confusing statements have been deliberately made in the application and MVV staff have been available at public exhibitions, by telephone, at the company's offices and via the company's website to explain the proposals and clear up any matter which is considered confusing.	-
Non Technical document phrased in a condescending manner	1	The „Non Technical Summary“ has by definition to be in simple language and not to use technical terms in order to make it accessible to as wide range of people as possible	ES, Volume 4 Non-Technical Summary
Misleading photography: aerial photography used is 2-3years out of date / no ground level photos / those chosen minimise visual impact	4	Many photographs have been taken specifically for the purpose of portraying the site as it is and with the proposed development. There are many photographs at ground level and those aerial photographs which have been used portray the site as it is and will be if the development goes ahead.	ES, Volume 1, Chapter 8 and appendices

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Documents that are in German and submitted to a British authority is unacceptable (since 321)	1	Das stimmt nicht! The documents submitted with the planning application are all in English. A pdf file saving error caused a small number of drawing instructions to be displayed in German, this has now been corrected. This had no impact whatsoever on the content of the planning application, which is entirely in English.	-
Insufficient research undertaken (health impact, environmental impact)	4	The Environmental Impact Assessment and Health Impact Assessment follow the guidance and procedures set out by the relevant professional bodies and various Agencies who will evaluate the application as consultees of the City Council.	-
Mount Batten used to obtain weather data and not Tamar valley with its own micro-climate	3	The Mount Batten weather station is the nearest metrological station with continuous records. The Air Quality Assessment takes into account the specific characteristics of the Tamar Valley.	ES, Volume 1, Chapter 13 & appendices Reg19, D13
Insufficient risk assessment for residents and turbine failure	4	The evaluation by the Environment Agency of the application for an Environment Permit takes into account emergency procedures in the event of mechanical failure.	Environmental Permit Application, Accident Management Plan
No reports from fire or ambulance service	1	MVV have had discussions with the MoD and Devon and Somerset Fire and Rescue Service in preparation for the submission of a Building Regulation application which is the stage at which fire safety is evaluated.	?
Have not received leaflet	1	MVV have distributed over 20,000 copies of their information leaflets and are happy to provide them to anyone requesting a copy.	-

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<p>Poor consultation process: MVV roadshows had no planning application documents, opening times of libraries outwith work hours, MVV posters misleading, consultation sessions poorly advertised. Consultation has not been meaningful. PR campaign misleading</p>	<p>28</p>	<p>The exhibitions in February 2011 were held prior to the preparation of the planning application and were designed to seek public views in order to respond to these in the planning application. All the planning documents were available at the June exhibitions. The exhibitions were widely advertised in the local media, including the Plymouth Herald and the Western Morning News. News releases were sent to broadcast and print media and received extensive coverage. Members of the SWDWP councils and Members of Parliament were informed of the events and invited to attend. Posters were also distributed to local libraries, shops and other public venues. In addition, and in order to address comments that some people had not been aware of the previous events, MVV issued a second eight-page edition of <i>MVV Devonport Update</i> giving details of all the exhibitions to be held in June 2011. Following the exhibition, the exhibition boards and further information material displayed at the exhibition was made available on MVV's website. The website also provides the opportunity for people to respond directly to MVV or to make comments or ask questions. The website address was included in the exhibition materials and in newspaper advertisements and on posters. Attendees at the public exhibitions were handed a feedback form which they were invited to complete at the event, or to return subsequently. Where requested assistance was provided by members of MVV's staff to enable attendees to complete the feedback form. The planning application is available 24 hours a day, 7 days a week, on the City Council and MVV's web site. It is not normal practice for copies of planning applications to be available at public libraries but MVV have put their application documents on deposit at every library in Plymouth. Library opening hours are a matter for the City Council. Copies of the application can be inspected at the company's offices and purchased in hard copy or on CD in accordance with the Environmental Impact Assessment Regulations. MVV has not undertaken a PR campaign as such, but rather has sought to inform the wider public and relevant stakeholders about its proposals. In order to achieve this MVV has used a wide variety of different channels (exhibitions, personal meetings, briefings, media contacts, internet, open office) to engage with the community. MVV will continue to proactively engage with the public and other relevant stakeholders.</p>	<p>Reg19 C3 & appendix</p>

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Call for public enquiry	45	If Plymouth City Council are minded to approve the application there will be an opportunity for the Secretary of State to „call in“ the application and to hold a Public Inquiry.	-

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CONTRADICTS POLICY			
Conflict with Waste Management and Disposal policies	2	The proposal is in accordance with the Waste Development Plan.	PASS Appendix 7 Planning Policy Analysis Reg19, C8
At bottom of waste hierarchy	7	Energy from waste with Combined Heat and Power is not at the bottom of the waste hierarchy and is positively encouraged by the coalition government in its recent (June 2011) review of waste policy for England. The waste hierarchy places landfill at the bottom, this is the current situation. EfW without CHP is placed above this, and EfW with CHP, which is the proposed solution, is placed above this.	ES, Volume 1, Chapter 5 Policy Analysis Reg19, D5 PASS Appendix 7 Planning Policy Analysis Reg19, C8
Not a site allocated in Plymouth Waste DPD	14	The site is not allocated in the Waste DPD but conforms to Policy W7 for non allocated sites.	PASS Appendix 7 Planning Policy Analysis Reg19, C8
Contradicts PCC "Every Child Matters", "narrowing the gap", other	4	The proposed development does not contradict this policy.	-

Category/ Topic	No. letters	Response	Reference*
Contradicts Government commitment to low carbon	1	The proposed development will save over 70,000 tonnes of carbon emissions per year; equating to 1,837,601 tonnes of carbon emissions over the course of a 25-year contract	PASS Appendix 3 Climate Change and Sustainability Statement Reg19, C4 PASS Appendix 4 Energy Economy Employment & Education Benefits Reg19, C5
Contradicts PPS12, PPS10	3	The proposed development accords with PPS10 and PPS12.	PASS Appendix 7 Planning Policy Analysis Reg19, C8
Contradicts localism bill, other PPSs and local planning statements	10	The proposed development does not contradict these policies and guidelines.	PASS Appendix 7 Planning Policy Analysis Reg19, C8

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TECHNOLOGY/ STRATEGY	260		
Alternative technologies are better / More environmentally friendly way of dealing w rubbish/ Out of date / Deemed unsuitable in Germany / Inefficient burning / Didn't look at alternatives	100	<p>Energy from Waste with Combined Heat and Power is in accordance with the most recent government guidance on managing residual mixed waste and accords with the Review of Waste Policy for England 2011 and the Arup Report for DECC on „Review of the generation costs and deployment potential of renewable electricity technologies in the UK.“</p> <p>Many alternative technologies and sites were evaluated by each of the Councils within the South West Devon Waste Partnership (SWDWP). All concluded that a thermal process of recovering energy from waste, alongside increased recycling and waste minimisation, was the best option available. The three councils then undertook a further options appraisal as a partnership. The three councils then undertook a further option appraisal as a partnership. The conclusion was similar to that of each individual authority's appraisal. The partnership then approached the waste industry with an open mind to all waste solutions, although they did stipulate a requirement that as a minimum a thermal process should be included as part of any proposal.</p> <p>The technology proposed here is not deemed unsuitable in Germany and MVV opened a new line using Energy from Waste with Combined Heat and Power at its plant in Mannheim in Germany in 2010.</p>	<p>PASS Appendix 7 Planning Policy Analysis Reg19, C8</p> <p>SWDWP: Outline Business Case (2008) & Final Business Case (2011) Overview on existing EfW plants: http://www.cewep.eu</p>
Detrimental to recycling / Not using recycling / Not a complete solution	58	<p>The proposed development is not a complete solution, but is the most efficient and appropriate way to manage waste which is not composted or recycled and is an important and integral part of a complete and efficient sustainable solution. EfW does not preclude or discourage recycling. Countries in Europe with the highest recycling rates also use Energy from Waste extensively to make use of residual waste e.g. Germany which has 66% recycling with 34% energy from waste.</p>	<p>PASS Appendix 7 Planning Policy Analysis Reg19, C8</p>

Category/ Topic	No. letters	Response	Reference*
Safety / Security concerns: contents of fuel; terrorist threat; accidents at facility; accidents at MoD base; one entrance to area in event of emergency	45	The proposed development has been evaluated by the MoD and Devon and Cornwall Police and found not to pose a security risk. The site has one main entrance outside the MoD security cordon HMNB Devonport and 2 emergency access points within the Naval base.	EPA, Accident Management Plan ES, Volume 1, chapter 6 Reg19, D6
Boiler failures have been recorded in German sister MVV plant	1	All Energy from Waste plants require planned and unplanned maintenance but there have been no „boiler failures“at MVV’s plants in Germany.	-
Council will pay penalties if not enough waste is produced	1	The contract with SWDWP has a „minimum delivery“ clause but this clause is set at a very low threshold.	Final Business Case (2011)
No plan for if incinerator breaks down	2	The evaluation by the Environment Agency of the application for an Environment Permit takes into account emergency procedures in the event of mechanical failure. The baling system proposed for managing waste when the plant is not operational addresses the situation when the plant is not available to burn waste.	ES, Volume 1, chapter 6 Reg19, D6 EPA, Accident Management Plan

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Not enough demand for energy produced / Dockyard is going to close	4	The plant is designed to supply the Dockyard with both steam and electricity and for any surplus electricity to be exported into the National Grid. Proposals are also being developed to supply energy from the plant to some local properties. In the event that the Dockyard ceased to be a major employer the energy network in the Dockyard with its predictable pricing system would be an attractive feature in encouraging new employment into the area.	PASS Appendix 4 Energy Economy Employment & Education Benefits Reg19, C5
Why do we need another facility so close at Lee Mill?	1	MVV have won the contract to manage non recycled residual waste in the SWDWP area. It is a commercial decision for Viridor whether they should develop the Lee Mill site, if they get planning permission.	-
IBA proposal has environmental and ecological problems	5	The IBA does not pose any environmental or ecological problems. It is extensively used in the UK and throughout Europe as a secondary aggregate. Use of IBA in this way reduces the need to open new quarries and extract primary aggregates.	See MVV's separate planning application for the IBA treatment facility at Buckfastleigh (DCC website, Application Reference DCC/3242/2011)
Not enough waste will be produced in the future as supermarkets are reducing their packaging	1	There are many sources of waste and numerous studies have been undertaken to establish local sources of material without compromising recycling targets.	This view is for example reflected in the Government Review of Waste Policy 2011 by Defra.

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Market for bottom ash is not identified	6	The market for IBA is well established in the UK and throughout Europe and specific markets will be developed locally when the product is about to be launched in this area. Currently secondary aggregates only account for 25% of the available aggregate market. The remaining 75% being primary aggregate. Reducing demand on primary aggregates is helping the construction industry to become more sustainable and conserve assets today that may be needed tomorrow.	See MVV's separate planning application for the IBA treatment facility at Buckfastleigh (DCC website, Application Reference DCC/3242/2011)
Concerns about what would happen during holidays	1	The plant will be staffed 24 hours a day for 365 days a year.	ES, Volume 1, chapter 6
There has been little demand for the Langage Energy Park and few jobs created	1	<p>The choice of the site in North Yard is made specifically because it is possible to supply steam and electricity to the existing activities in the Naval Base from Day 1 of operations. The proposed development will both reduce the cost of energy for Babcock and the MoD, as well as carbon emissions from the existing power plants in the Dockyard, thus making the retention of existing employment in the Dockyard more likely and improving the potential of attracting further contracts and employment.</p> <p>It is estimated that there will be an average of 159 persons employed on the construction site each day of the 30 month construction period. The peak will be reached during October 2013 with about 309 persons employed on site. These figures are based on the best estimates of MVV' and its sub-contractors.</p> <p>During the operational period of the project, MVV will require 33 full time equivalent posts for the operation and maintenance of the EfW plant. These positions will range from posts requiring a high level of training, knowledge and education, such as the Operations and Maintenance Engineers, through to roles with a lower entry level, such as weighbridge operators, shift team members and tipping hall supervisors. MVV intends to recruit to operational positions locally wherever it is possible to do so.</p>	PASS Appendix 4 Energy Economy Employment & Education Benefits Reg19, C5

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MVV will receive business waste. This will not have been recycled	2	Commercial and Industrial waste is recycled at higher rates than household waste because businesses know and understand that it makes economic sense to minimise waste production and to recycle and compost as much of the waste that is produced as possible. The plant will enable Commercial and Industrial waste that would otherwise have been landfilled, to be used to generate energy.	PASS Appendix 3 Climate Change and Sustainability Statement Reg19, C4 PASS Appendix 4 Energy Economy Employment & Education Benefits Reg19, C5
Object to waste being transported from afar: cost of transporting waste; not fair to residents; undermines drive towards energy reduction	32	Waste will not be brought long distances to this facility. The majority of vehicles (69%) delivering household waste to the facility will be from within Plymouth itself. The remainder will come from neighbouring Torbay, South Hams and West Devon. To minimise transportation from these areas the waste will be bulked up prior to transportation. Currently the majority of household waste arising in Plymouth is bulked up at the Chelson Meadow facility and transported 21 miles for disposal at the Lean Quarry landfill site at Liskeard in Cornwall. The provision of the EfW facility within Plymouth will mean that this is no longer necessary. The carbon footprint of bringing waste to this facility and generating combined heat and power represents the most sustainable way of managing waste which is not recycled in South West Devon.	PASS Appendix 3 Climate Change and Sustainability Statement Reg19, C4

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STRUCTURE	263		
Noise / light pollution from facility	114	The proposed development will not generate noise and light pollution. It is proposed that only the south east facade of the building will be illuminated and that will be restricted to the hours between dusk and 11:00 pm and the light spillage will be managed by using LED lighting.	ES Volume 1, chapter 14 & appendices Reg19, D14 ES, Volume 1, chapter 6 ES Volume 1, chapter 8 Reg19, D8
Visual Impact / It's ugly / It will dominate local area / Will spoil vistas/ Size / Object to warship design	93	The appearance of any building is a matter of opinion by individuals. The proposed development has been subject to Visual Impact Assessment by Landscape Architects and evaluated by the South West Design Panel and trained Landscape Architects and Urban Designers in Plymouth City Council and Natural England.	ES, Volume 1, chapter 6 PASS Appendix 1: Design and Access Statement ES Volume 1, chapter 8 Reg19, D8
Waste storage / Attracts rats	2	The waste will be contained within a deep bunker and regularly disturbed by the crane making it an unwelcome habitat for rats and other vermin.	ES, Volume 1, chapter 6
Lighting Scheme	15	The lighting scheme has been developed at the request of the City Council to promote the activities within the building. It is proposed that only the south east facade of the building will be illuminated and that will be restricted to the hours between dusk and 11:00 pm and the light spillage will be managed by using LED lighting.	ES, Volume 1, chapter 6 PASS Appendix 1: Design and Access Statement ES Volume 1, chapter 8 Reg19, D8

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Wooden fence is an eyesore	1	Different types of fencing are proposed in each area of the site which are appropriate to the setting and level of security.	ES Volume 1, chapter 8 Reg19, D8
Nearby lane ownership issues	1	It is understood the lane alongside the railway at the rear of Hamoaze Avenue is in dispute but this is outside the proposed development site.	-
Safety concerns - height of chimney, earthquake	8	The proposed chimney and its foundations will be assessed by structural engineers to ensure that it is safe and meets all relevant standards and regulations.	EPA, Background Information ES Volume 1, chapter 6
Run 24 hrs a day / 365 days a year	9	The plant will operate and be staffed 24 hours a day for 365 days a year but will only receive waste between 8:00 am and 7:00 pm Mondays to Fridays; 8.00 am to 6.00 pm Saturdays and 8.00 am to 4.00 pm Sundays.	ES Volume 1, chapter 6

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IMPACT ON PLYMOUTH	88		
Adversely Affect Reputation of Plymouth / Contradiction to plan to become "Healthy, wealthy, safe, strong and wise" / Adversely affect tourism	50	The proposed development will contribute significantly to Plymouth's ambition to be a city that delivers the highest possible quality buildings and public spaces to attract and sustain the highest quality business, education, living, and recreation opportunities for citizens, investors, and visitors alike and is totally compatible with its status as a regional growth centre.	PASS Appendix 7 Planning Policy Analysis Reg19, C8
Cost to Plymouth / PFI cost / an expensive solution	38	The proposed Energy from Waste Combined Heat and Power plant will save the SWDWP authorities £389m against the predicted cost for the project and more than £675 million over the 25-year life of the contract – when compared with the costs of continuing to landfill the waste. Local businesses in Plymouth will also benefit from reduced costs for waste disposal.	SWDWP: Outline Business Case (2008) & Final Business Case (2011)

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IMPACT ON COMMUNITY / INDIVIDUALS	138		
Loss of Woodland/ Wildlife / potential for pollution of Weston Mill Lake	36	The proposals will enhance the ecology and wildlife of the area. There are detailed proposals for the improvement of Blackies Wood and the improvement of Weston Mill Lake could be brought about with help from the Community Fund which will be established.	PASS Appendix 1: Design and Access Statement ES Volume 1, chapter 8 & appendices Reg19, D8
Threat to River Tamar &/or South Dartmoor SAC	7	The impact on all European; UK and local Nature Reserves and protected areas has been evaluated and the proposals will be subject to an „Appropriate Assessment“ by the City Council with Natural England and the Environment Agency.	ES Volume 1, chapter 7 Reg19, D7 PASS Appendix 6 Habitats Regulations Assessment Reg19, C7 ES Volume 1, chapter 11 Reg19, D11
Value of Property	43	The increase or decrease in property values is not a material consideration in determining planning applications.	-
Loss of view / overshadows property	20	There will be no overshadowing of any properties and only a limited number of houses will suffer a loss of views.	ES Volume 1, chapter 16 ES Volume 1, chapter 8 And appendices Reg19, D8

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<p>No benefit to local community: No local jobs created / Only Babcock and Naval Dockyards will benefit, profits will go to Germany</p>	<p>32</p>	<p>The proposed development will bring increased security to local employment. The ability of the MOD to source a secure supply of energy at a reduced cost will enhance the future prospects of the Devonport dockyard, enabling it be more competitive and supporting future employment at the dockyard.</p> <p>It is estimated that there will be an average of 159 persons employed on the construction site each day of the 30 month construction period. The peak will be reached during October 2013 with about 309 persons employed on site. These figures are based on the best estimates of MVV' and its sub-contractors. MVV's civil engineering contractor, Kier, will employ approximately 70% of its labour force locally from Plymouth, Devon and the wider South West area.</p> <p>In addition to the MVV and Kier employees who will be located in Plymouth during the construction period, MVV's process sub-contractors will also locate staff in Plymouth to assist with the project. These staff will be using local services such as hotel and bed and breakfast accommodation, local restaurants and other retail outlets. Based on MVV's experience for every direct job created a further 2 are created locally in support services such as these.</p> <p>During the operational period of the project, MVV will require 33 full time equivalent posts for the operation and maintenance of the EfW plant. These positions will range from posts requiring a high level of training, knowledge and education, such as the Operations and Maintenance Engineers, through to roles with a lower entry level, such as weighbridge operators, shift team members and tipping hall supervisors. MVV intends to recruit to operational positions locally wherever it is possible to do so.</p> <p>In addition to those members of staff directly employed at the plant, MVV will require other support services, such as welding, industrial cleaning, painting and coating, process systems and IT support amongst others, for the operational period. These services and</p>	<p>PASS Appendix 4 Energy Economy Employment & Education Benefits Reg19, C5</p>

Category/ Topic	No. letters	Response	Reference*
		<p>skills will be required to support MVV in undertaking both scheduled and ad-hoc maintenance tasks. MVV and its construction and process sub-contractors will undertake a “Suppliers & Employment Day” later in 2011 to give local companies and individuals the chance to introduce themselves and investigate job and contract opportunities during construction and beyond.</p> <p>The draft section 106 submitted by MVV includes proposals for a local heating system; a „community fund“ of £52,00 per year to be used to support local community initiatives, a play area and sponsorship for local apprenticeships.</p> <p>MVV will also provide a Community Area to help develop public awareness and understanding of waste management and other wider waste reduction issues. MVV will offer visits to the plant to local community groups.</p> <p>The Community Area will be available in agreement with SWDWP for use by the public when it is not being used for its primary purpose of promoting the EfW CHP facility and waste reduction initiatives. Community groups and organisations will also be able to meet outside the opening hours, by prior arrangement.</p>	<p>PASS Appendix 8 Draft Heads of Terms</p> <p>ES Volume 1, chapter 6 PASS Appendix 4 Energy Economy Employment & Education Benefits Reg19, C5</p>
Would like to see a taxi-bus service	1	It is understood that the local Taxi-bus is operating again after a period when it did not operate.	-
Local community facilities provision inadequate	2	The Community Area will be available in agreement with SWDWP for use by the public when it is not being used for its primary purpose of promoting the EfW CHP facility and waste reduction initiatives. Provided that it does not interfere with the main purposes of assisting in promoting efficient waste management in the Partnership area there will be opportunities for local residents to use the Visitor Centre by prior agreement. Community groups and organisations will also be able to meet outside the opening hours, again by prior arrangement.	ES Volume 1, chapter 6 PASS Appendix 4 Energy Economy Employment & Education Benefits Reg19, C5

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Negative impact on emotional and mental health of locals; quality of life	23	There is no reason why the proposed development should cause any negative impact on the emotional and mental health of local residents or their quality of life. The proposals for local heating should ease the concerns of people who will benefit from the scheme with regard to the increasing cost of gas and electricity.	PASS Appendix 5 Health and Well-being ES Volume 1, chapter 18 Reg19, D18