Proposed Incinerator at Ernesettle

The Tamar Estuary is an Area of Outstanding Natural Beauty (AONB) and the landscape and wildlife is internationally recognised and protected.

The AONB designation recognises that the area is of national importance and should be protected for future generations.

Caradon Local Plan Policy C1 states of an AONB: “there will be a presumption against development which would adversely affect the amenity and landscape character of these areas... planning permission will not normally be granted for development which would have an adverse impact on the character and appreciation of these areas.”

Plymouth Sound and Estuaries are designated a Special Area of Conservation under the European Unions Habitats and Species Directive 92/43/EEC and UK Conservation Natural Habitats Regulations (1994)

Sections of the Tamar Estuary are Special Protected Areas under the Wild Birds Directive (1979) The Tamar is an important wintering site for the Avocet which can be viewed from birdhides in Cargreen, Landulph and from across Kingsmill Lake on the Cornish side of the river.

In addition Tamar birdwatching cruises feature sightings of the little egret, shelduck, curlew, oystercatcher, blacktailed godwit and are a popular tourist attraction.

Construction of an incinerator in this environmentally sensitive area may well lead to disturbances and a subsequent decline in the population of these nationally important birds.

Whilst the proposed development at Ernesettle is likely to be some distance from the foreshore there may be impacts on this European Marine Site as a result of contamination from drainage or discharges with consequent adverse impact on marine habitats.

With regard to Renewable Energy (energy from waste incineration) Central Government Policy is “to stimulate the exploitation and development of renewable energy sources whenever they have prospects of being economically attractive and environmentally acceptable” Dept. of Energy Paper 55 Renewable Energy in the UK.

However Planning Policy Guidance Note No 22 Renewable Energy (1993) which strongly supports alternative energy development cautions that “such support must be weighed carefully with the policies for protecting the countryside. Particular care should be taken... in assessing proposals in Areas of Outstanding Natural Beauty ... and on the coast”
Caradon District Council’s Local Plan (1999) Policy REN1 states of energy from waste proposals

(i) The proposal must not have an unacceptable impact on the character and appearance of the immediate and wider landscape and of areas of natural interest.

The proposed incinerator will be clearly visible from the Tamar Bridge to all visitors entering and leaving Cornwall, to a very large number of residents in Saltash and to all persons on the Cornish side of the river.

(iii) The proposal must be capable of being operated and serviced with no unacceptable impact to the amenity of nearby habitation with regard to noise, smell, dust, vibration, smoke or other air pollution.

According to Greenpeace (2001) research evidence confirms that emissions from incinerators contain heavy metals (lead and mercury which have been linked to renal damage) plus Dioxins and Furans (linked to cancer and to foetal malformation) and Acid Gases (linked to respiratory problems).

There is also concern as to the disposal of toxic waste – the ash left from the incinerated materials known as toxic fly ash. This hazardous ash which has shown to contain traces of antimony, arsenic, copper, lead, mercury and nickel as well as dioxins and furans will need to be transported away from the site for disposal.

(iv) The proposal must not create a threat to road safety through traffic generation

There is only one access road in and out of Ernesettle. The volume of traffic is estimated to rise by at least 40 vehicles a day resulting in 80 extra HGVs each day entering/exiting at the A38 junction.

Accessibility may well prove problematic in the event of an accident or a fire. A recent fire caused by the failure of an hydraulic ram in the Isle of Man Incinerator was attended by several fire crews all wearing breathing apparatus due to toxic fumes. Above and behind the Ernesettle site is a residential area, in the event of a fire smoke and fumes would rise and be carried towards these homes.

A further potential hazard is the storage and transportation of weapons and ammunition from and to Ernesettle’s Explosive Storage Safeguarding Area. These explosives are transported by road to a jetty near the Tamar Bridge then loaded onto barges to be transferred to ships in Plymouth Sound.

The advisability of locating an incinerator in the vicinity of a centre for storage and distribution of explosives is questionable.
Ernesettle, being a Greenfield site, was previously (2005) identified as a reserve site “only to be brought forward for development if the other sites identified cannot be brought forward for waste development”. It now appears to be the preferred site. The most likely reason for this change of status is the fact that Plymouth City Council has now acquired the site and is therefore not constrained by land ownership.

It is generally accepted that Plymouth City Council’s first choice of location for the incinerator was Coypool in Plympton and this would be an ideal setting being an existing quarry, well screened from surrounding areas, with excellent access, and, without the constrains and restrictions of conservationists and those institutions concerned with the well being and preservation of our heritage, environment and wildlife.

As Coypool belongs to a construction company Plymouth City Council is constrained by land ownership. The choice of Ernesettle for the location of the proposed incinerator is therefore a matter of convenience rather than being in the best interests of the local community.

The potentially negative effects of building a waste to energy incinerator at Ernesettle are acknowledged in the Entec Report (2007) which claims that any detrimental features can be screened, minimised or (frequently) mitigated, however once in place they cannot be eliminated or eradicated.

The ideal solution would be for Plymouth to persuade the company which owns Coypool to allow the building of the incinerator on that site.

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Submitted on behalf of the residents of Landrake/St Dominick Ward – Caradon District Council South East Cornwall

Olive Eggleston  District Councillor (dated) 19 December 2
Proposed Incinerator at Ernesettle - Plymouth

The attached further representation statement is submitted by District Councillor Olive Eggleston on behalf of the residents of Landrake /St Dominick Ward of the Caradon District in South East Cornwall.

The ward comprises the following Parish Councils

**Botus Fleming** clerk Helen Wright  h.wright@virgic.net

**Landrake with St Erney** clerk I J Biffen  ianbiffen@hotmail.co.uk

**Landulph** clerk Sue Hooper  suecfmsn.com

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**St Dominic** clerk Vicky Tattersall  Tattersally@aol.com

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Dated 19 December 2007