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March 23rd, 2010

Proposed Landfill and Incinerator site at New England Quarry, New England Hill, Lee Mill, Devon - Reference no: DCC/2975/2010

We have been informed by members in Devon of the above application, and would like to take this opportunity of objecting to the proposed development.

The Salmon & Trout Association (S&TA) was established in 1903 to address the damage done to our rivers by the polluting effects of the Industrial Revolution. For 107 years, the Association has worked to protect fisheries, fish stocks and the wider aquatic environment on behalf of game angling and fisheries interests. In 2008 we were granted charitable status. S&TA's charitable objectives empowers us to address all issues affecting fish and the aquatic environment, backed up by strong scientific evidence from our burgeoning scientific network – a vital factor in 21st century policy and decision making processes. Our charitable status enables us to take the widest possible remit in protecting salmonid fish stocks, and the aquatic environment upon which they depend.

There are a number of concerns that we have with the proposed development of an incinerator and landfill facility so close to the River Yealm. Principally, these are:



- The River Yealm is an important salmonid spate river, already impacted by water abstraction, waste water disposal, china clay workings, industrial and agricultural input. It is also heavily protected under various schemes but especially as a Special Area of Conservation (SAC) under the EU Habitats Directive. The Atlantic salmon, an important migratory salmonid species running the Yealm, is designated under Annex 1 of the Directive.
- Brown trout and sea trout are also present in significant numbers in the Yealm and are Biodiversity Action Plan species.
- In a review of potential waste disposal sites undertaken by the Devon County Council in 2006, this site was ranked just 60th out of 87 surveyed for suitability. We fail to see what could have catapulted this proposal up the rankings so quickly, especially within an area so valuable for its aquatic biodiversity that it was considered necessary to provide it with the strongest possible protection under European environmental legislation and UK law.
- The Landfill application is seeking a capacity approaching 1m cubic metres. However well lined the landfill pits will be, most of the waste will lie within the water table, and there is obvious potential for leachate to permeate through to the river, including toxic chemicals and heavy metals. This would be disastrous for the river's ecology, and could render the system completely sterile for migratory salmon and sea trout, in that pollution barriers are as effective as physical barriers for impeding migration routes to upstream spawning and juvenile habitat, and hence the continued production of these species in the catchment.
- We understand that there is a great deal of controversy around the incineration process intended for this site. In particular, although investment will inevitably be made in capturing toxic particles before they reach the air, there is evidence that nano-particles containing heavy metals and dioxins could evade interception and be spread across wide areas of countryside. This not only has the potential to contaminate surrounding farmland and natural ecosystems, but will also be a



further source of pollution for the river. With the ability of aquatic organisms to bio-accumulate toxins, especially dioxins, this again could have disastrous implications for the river's ecology and, indeed, human health, as fish and shellfish caught within the river and its estuary are eaten.

- Delivery of measures to achieve good ecological status in our rivers under the EU Water Framework Directive (WFD) has now begun. A stipulation of the Directive is that there should be no further deterioration in ecological quality, yet this proposed development will hang over the river's ecology like the Sword of Damocles, with the potential to destroy much of its aquatic life at anytime. This has implications not only for delivery of objectives under the regional WFD River Basin Plan, but also for the Government, as failure to achieve those objectives could result in infraction proceedings.
- If planning permission is granted, even before the site is established, its construction would cause interference with the river's ecology, especially in the construction of a new proposed bridge. Following construction, the amount of heavy goods traffic required to keep the incinerator fed at economical levels would impact significantly on this tranquil piece of Devon countryside, and almost certainly on the river and its ecology as well.
- In August 2008, the new Blachford fish pass was opened. This was the culmination of a project supported particularly by the Environment Agency, River Yealm Association, Action for Wildlife Project, West Country Rivers Trust and Roland Peeters. Its construction opened up the river to migrating fish species, and was hailed, quite rightly, as a superb example of community participation in a local conservation and management programme. It was considered so important that the EA's Sea Trout and Salmon Strategy was launched alongside the official opening of the fish pass by Lord Smith, the EA's Chairman. All the work done with that achievement, and the national publicity that derived from it, will be jeopardised if this development is allowed to proceed.



Incineration versus Recycling

After some research, we believe that an incinerator is not the ideal method of processing waste on this scale for the following reasons:

- Incineration destroys waste material, thus using up valuable natural resources which are increasingly under pressure globally
- Incineration leaves behind toxic ash which requires specialist disposal, and delivers toxins into the environment
- An incinerator requires massive capital investment, which would take several decades to recover
- An incinerator on this scale requires huge amounts of waste to keep it running economically. Therefore, because of the timescale involved in repaying investment, it would become the main source of waste treatment from a wide area of Devon for 25-30 years and would stifle the use of innovative systems as technology improved
- It would create relatively few local jobs

Alternatively, a recycling unit would provide significant benefits:

- The capital investment required would be far less than an incinerator
- Investment timescales would be shorter, so allowing more flexibility in the use of future improved technology
- A recycling plant would employ more people locally



- By its very nature, a recycling plant would be more environmentally acceptable, both in its reuse of natural resources and its much reduced impact on the local environment

In summary, we see an incinerator as the wrong type of waste processing system for this area, one which would have enormous jeopardy for the aquatic environment and its dependent species. The Yealm is a fragile spate river, whose ecology is clinging on in spite of many impacts from water abstraction, waste water disposal and industrial and agricultural input. Much work has been undertaken by both statutory agencies and local interests to conserve the river's ecology, and anything along the lines of this proposal that could undermine all that effort should be refused outright. If it is not, then the consequences would be grave for the river's ecology, and would almost certainly involve legal proceedings under European environmental legislation.

Yours sincerely,

Paul Knight
Chief Executive