

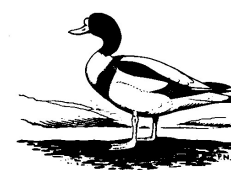
TEES VALLEY JOINT MINERALS AND WASTE DEVELOPMENT PLAN (FINAL)

COMMENTS BY THE TEESMOUTH BIRD CLUB ON THE CORE STRATEGY AND POLICIES AND SITES DOCUMENTS



COWPEN BEWLEY LANDFILL SITE – TBC GUIDED TOUR (2008)

Ted Parker



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RPT026/TBC/ECP

1.0 INTRODUCTION

1.1 Background

- 1.2.1 Teesmouth Bird Club (TBC) was consulted on the first stage Core Strategy and Policies and Sites documents and our response is contained in our document issued to all interested parties in April 2008¹. Prior to this, we had not been consulted as part of the stakeholder workshops held in December 2006, though we do appreciate being consulted at this and the draft stages.
- 1.2.2 The documents were circulated to members of TBC's Conservation Sub-Committee, which is composed of people with a wide range of disciplines, including Ecology, Landscape Architecture, Engineering, Nature Conservation and Ornithology. Our comments are confined solely to environmental issues insofar that these may affect bird habitats and populations in the areas defined in the documents. As our general comments were outlined in our April 2008 response, for brevity we only repeat the most significant here. This response is, therefore, confined to specific comments on various aspects of the DPDs dated August 2009.

2.0 EXISTING WASTE MANAGEMENT AND MINERALS SITES

2.1 Existing Waste Tips

- 2.1.1 There are three existing waste disposal sites around the Tees Estuary at Cowpen Bewley Landfill, Hargreave's Quarry and Seaton Meadows. Visually and environmentally these have adversely impacted on the ecological and visual character of the Tees Estuary. There have also been issues surrounding the proper management of the sites, particularly the Seaton Meadows site. In early 2008, the Environment Agency received a series of complaints due to severe pollution of the adjacent Teesmouth and Cleveland Coast SPA and Ramsar site, Seaton Dunes and Common SSSI and National Nature Reserve by large quantities of wind-borne rubbish, including numerous plastic bags. The area contaminated was large, with rubbish collecting in hedgerows, fence lines, vegetation, pools and ditches. Manual collection of the rubbish by the tip operator only partly resolved the problem and there has been a number of further incidents. Similarly, the Cowpen Bewley Landfill has occasionally polluted the adjacent Cowpen Marsh with airborne rubbish but to a lesser extent. There have been fires at Seaton Meadows and Hargreave's Quarry was used for the disposal of animal carcasses during the 2001 foot-and-mouth outbreak. TBC members have also witnessed exploding drums at this site and the smell emanating from the tip is occasionally very unpleasant.
- 2.1.2 The waste tips have been built up to a considerable height and have heavily engineered profiles. They are consequently visually obtrusive and out of place in an otherwise flat, estuarine landscape. They also impair the attractive views out towards the Cleveland Hills and have altered the character of the Tees Estuary forever.

3.0 SPECIFIC COMMENTS ON THE DPDS

3.1 General

- 3.1.1 The two documents are well-written, clear, concise and well researched. We wholeheartedly agree with the underlying philosophy of reducing the amount of waste going to landfill and

¹ 'Tees Valley Joint Minerals and Waste Development Plan – Comments by Teesmouth Bird Club on the Policies and Sites Documents' (April 2008, RPT/019)

increasing and extending a wider range of recycling as the way forward. We also concur with reducing travel distances to recycling sites through a more strategic spread across the Tees Valley.

- 3.1.2 We would like to draw a distinction with the term 'brownfield', which does not always mean 'ecologically poor' and, therefore, ripe for re-development. Indeed, some of the best sites around the Tees Estuary are brownfield in origin, such as the Reclamation Pond and its surrounding plateau (shortly to be infilled), Hargreave's Quarry and the Power Station Field on the seaward side of the Hartlepool Power Station.
- 3.1.3 We consider that robust EIAs must accompany any proposed new sites, followed by rigorous Conditions at approval stage, which are monitored and enforced.

3.2 Specific Comments

CORE STRATEGY/POLICIES AND SITES	POLICY OR SECTION	COMMENTS
CORE STRATEGY –PREFERRED OTPIONS REPORT		
OPERATIONAL PRACTICES, RECLAMATION AND THE ENVIRONMENT	3.1.6	<i>"The acceptability of facilities depends upon their management".</i> Please see our comments in paras 2.1.1 and 2.1.2 above.
OPERATIONAL PRACTICES, RECLAMATION AND THE ENVIRONMENT	3.1.6	<i>"Any development which adversely affects a European designated site, either alone or in combination with other plans or projects, would not be in accordance with this Core Strategy."</i> Statements such as this we fully endorse but sometimes they do not stack up in reality. Pollution from the Seaton Meadows Tip is a case in hand (please see our comments in paras 2.1.1 and 2.1.2 above). More rigorous monitoring and controls are required on existing and new waste management sites, and more stringent penalties imposed.
CORE STRATEGY –POLICIES AND SITES DOCUMENT		
STOCKTON SOUTH AREA SEARCH	Policy MWP7	TBC does not favour the two western sites: we believe that sites should be concentrated in existing industrial areas.
SITE ALLOCATIONS	3.3	Specific sites listed for the Tees Valley for expansion/new sites.
GRAYTHORP INDUSTRIAL ESTATE	3.3.1	Four-hectare site for recycling. TBC has no issues or concerns with this location.
HAVERTON HILL	3.3.2	Expansion of existing site complex to 6 ha. TBC has no issues or concerns with this location.

CORE STRATEGY/POLICIES AND SITES	POLICY OR SECTION	COMMENTS
NEW ROAD, BILLINGHAM	3.3.4	<p>Site within an existing industrial area earmarked for 29ha Eco-Park.</p> <p>No issues or concerns but TBC draws attention to the presence of the wetland habitat bordering nearby Billingham Beck, including open water, reed bed and scrub. Proposals should not impact on this area.</p>
PORT CLARENCE, STOCKTON	3.3.6	<p>Planning consent granted in 2008 for the development of advanced waste treatment, including hazardous waste and difficult commercial and industrial waste, soil washing and recovery. It is not clear from the documents whether the new treatment facilities at Port Clarence lie within the existing Planning Consent boundary.</p> <p>This is a highly sensitive 'brownfield' site, forming part of the former Hargreave's Quarry – an important ornithological site in the Tees Estuary complex of habitats, particularly the North Tees Marshes. The northern part of the quarry has, sadly, now been tipped on and the area has been built up to a totally inappropriate level. It is bordered by ornithologically significant and nationally designated sites, including Dormans Pool SSSI to the north, RSPB Saltholme SSSI and the newly created Port Clarence Pools to the west, and remnant scrub, wetland and open grassland to the south and east. TBC has concerns over the further increased use of this site for the disposal of hazardous waste, bearing in mind that there are already three large working tips in the area already (Seaton Meadows and Cowpen Bewley Landfill being the other two). The RSPB's new flagship reserve at Saltholme lies less than a kilometre away to the north-west and is expected to attract 100,000 visitors per year, many coming from outside the Tees Valley area. Further toxic waste treatment is not commensurate with the development of the surrounding area as wildlife resource and will adversely affect visitors' perceptions of the Tees area. The development may also destroy additional habitat. There is also the issue of the transportation of toxic waste close to environmentally sensitive sites. The site also only lies a short distance away from Middlesbrough's prestigious Middlehaven development.</p> <p>TBC would wish to be consulted on more detailed proposals for this site and if an EIA is to be prepared, then this will need to be robust and objective. An objection may be lodged.</p>
SOUTH TEES ECO-PARK	3.3.8	<p>27 ha former steelworks site, which will deal mainly with municipal solid and commercial/industrial wastes.</p> <p>TBC has no concerns over this site.</p>

CORE STRATEGY/POLICIES AND SITES	POLICY OR SECTION	COMMENTS
HART QUARRY	3.3.14	<p>Construction and demolition waste recycling.</p> <p>TBC has major concerns over this site. Hart Quarry is important in a Cleveland-wide context because of its breeding Peregrines (<i>Falco peregrinus</i>), which have an eyrie on the quarry face. This pair is only one of three or four in the sub-region. Peregrines only started breeding again in Cleveland in 1999 for the first time since the early 1700s; the Hart Quarry pair was first noted in 2002 and has been informally monitored since by Teesmouth and Durham Bird Clubs. To the end of the 2009 breeding season, 22 young have been reared at the site, which is exceptional. This species is protected under Schedule 1 of <i>The Wildlife and Countryside Act 1981</i> and is also Amber Listed. Whilst it is increasing in the UK, it remains a nationally scarce breeding bird and is vulnerable to disturbance and illegal egg and young taking.</p> <p>Hart Quarry holds one of Cleveland's largest colony of Jackdaws (<i>Corvus monedula</i>), with 137 pairs recorded during the TBC's Breeding Bird Survey.</p> <p>At least one pair each of Kestrel (<i>Falco tinnunculus</i>) and Little Owl (<i>Athene noctua</i>) also breed in the quarry. The former is an Amber List species.</p>
STOCKTON QUARRY	3.3.15	<p>Site for demolition and construction waste recycling. It is not clear from the documents whether the site allocation shown is covered by an existing Planning Consent.</p> <p>TBC endorses the use of the existing quarry but the remainder of the proposed site allocation is 'green' land and ornithologically sensitive. It was surveyed in 2004 as part of the TBC's 'Breeding Birds Survey' (1999-2006), which revealed arable farmland, woodland and excellent, old, well-timbered hedgerows. Forty-two breeding species were recorded, including Red List species such as Grey Partridge (<i>Perdix perdix</i>), Lapwing (<i>Vanellus vanellus</i>), Skylark (<i>Alauda arvensis</i>), Song Thrush (<i>Turdus philomelos</i>), Willow Tit (<i>Parus montanus</i>), House Sparrow (<i>Passer domesticus</i>) and Linnet (<i>Carduelis cannabina</i>), and Amber List species including Green Woodpecker (<i>Picus viridis</i>), Sand Martin (<i>Riparia riparia</i>), Dunnock (<i>Prunella modularis</i>), Whitethroat (<i>Sylvia communis</i>), Willow Warbler (<i>Phylloscopus trochilus</i>), Bullfinch (<i>Pyrrhula pyrrhula</i>), Yellowhammer (<i>Emberiza citrinella</i>) and Reed Bunting (<i>Emberiza schoeniclus</i>).</p> <p>Site restoration should retain the quarry face, as cliff-faces are rare habitats in inland areas in Cleveland and provide sites for cliff-nesting birds.</p>



STOCKTON QUARRY, WYNYARD – SITE FOR WASTE RECYCLING: An ornithologically sensitive location.

4.0 CONCLUSIONS

4.1 General

- 4.1.1 We fully support the underlying philosophy contained in the two reports, ie reducing the amount of waste going to landfill, ensuring a wider spread of recycling sites across the Tees Valley and ensuring greater recycling of waste materials, providing that this does not severely compromise sites of significant environmental interest.
- 4.1.2 We consider that there is a disproportionate number of waste disposal sites around the Tees Estuary and would not support a further expansion of these in view of the international and nationally important environmental interest of this area.
- 4.1.3 We support the use of existing waste disposal sites and abandoned industrial areas for new locations but not greenfield sites, such as that proposed at Wynyard.

4.2 Monitoring

- 4.2.1 Rigorous monitoring is required of all existing and new waste disposal/recycling sites in order to avoid breaches of licence consents and to rectify pollution incidents quickly. Presumably, this will be carried out as part of the proposed five Boroughs' Annual Monitoring Reports.

4.3 Environmental

- 4.3.1 All Applications for expansions to existing facilities or the creation of new sites should be accompanied by robust Environmental Statements, which have been arrived at through thorough, objective research and consultations; the latter not only with the statutory consultees but also local nature conservation groups, such as TBC, Tees Valley Wildlife Trust and Durham Bird Club, which hold valuable local information and knowledge. Any Planning Approvals for expansion to existing or new developments should be heavily Conditioned to ensure that sites are responsibly managed and the environment protected.
- 4.3.2 We would welcome further consultation. Our contact details are: **Ted Parker, Chairman, Conservation Sub-Committee, Teesmouth Bird Club, 9 Morton Carr Lane, Nunthorpe, Middlesbrough, TS7 0JU. Tel: 01642 275369 Email: ecparker@supanet.com**