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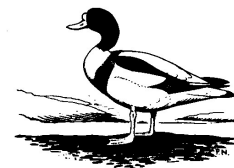
**THOR COGENERATION PROJECT**

**A FORMAL RESPONSE BY TEESMOUTH BIRD CLUB TO  
THE ENVIRONMENTAL STATEMENT AND  
SUPPLEMENTARY BIRD REPORT**



RECLAMATION POND, TEESMOUTH (ca EARLY 1980s)

Ted Parker



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Registered Charity No 508850

**March 2007**

RPT016/ECP

## 1.0 INTRODUCTION

### Teesmouth Bird Club's Appraisal Process

- 1.1 The Teesmouth Bird Club (TBC) was founded in 1960 and is one of the longest-standing nature conservation bodies in the Tees Valley, with a particularly good knowledge of the birds of the Tees Estuary. We produce the annual '*Cleveland Bird Report*' and are responsible reviewing all bird records within our recording area (defined by the boundary of the former County of Cleveland, now the 4 unitary authorities of Hartlepool, Stockton-on-Tees, Middlesbrough and Redcar and Cleveland). Our membership stands at over 320 and many of our members undertake the monthly Wetland Bird Survey (WeBS) counts for the Wildfowl and Wetlands Trust in the Tees Estuary and national and local census work. We have a huge knowledge of the Teesmouth area and are pleased to be consulted on this Environmental Statement (ES).
- 1.2 The ES was kindly provided by Thor Cogeneration as hard copy and on CD. It has been circulated to and reviewed by the TBC's Conservation Sub-Committee and the comments contained herein reflect the official views of the Club. We are aware of the complex ownership and Planning history of the site and our comments reflect this. We have also reviewed the '*Bird Report*' prepared by Carter Ecological Limited, forwarded to us by Thor Cogeneration on 13th March 2007.
- 1.3 A number of TBC members attended the public consultation and display, hosted by Thor Cogeneration at Billingham, on 2nd March 2007 and we were able to clarify and comment on some issues relating to the current development proposal.
- 1.4 We have confined our comments to key areas of the ES and '*Bird Report*' that lie within our areas of expertise.
- 1.5 The TBC was not included in the early stages of the consultative process by Thor Cogeneration, which included the RSPB and Natural England.

## 2.0 GENERAL COMMENTS

### 2.1 General Comments

- 2.1.1 The ES is generally comprehensive and covers the key receptors and impacts. There is, however, a number of inaccuracies and certain sections are heavy on assumptions and light on objective conclusions.

### 2.2 Summary of TBC's Main Concerns

- 2.2.1 Our main concerns are as follows:
  - **We are extremely concerned that the proposed 10-hectare site has 31 hectares of additional "lay-down area", which is to be used for short-term storage and fabrication.** This more than doubles the site area and destroys a significant part of the southern and western sections of the Reclamation Pond. We believe that this is both unnecessary and violates the terms of the '*North Tees Agreement*'. The impact will be the permanent loss of a significant part of a nationally important habitat, which includes Water Voles, for short-term, transient 'development'. We assume that the lay-down area will be redundant after commissioning. We consider this to unacceptable.

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- **We are extremely disappointed that the ES has not included an assessment of the predicted impacts on the Reclamation Pond.** Stockton-on-Tees Borough Council's *'Local Plan'* draws attention to the national ornithological importance of Dormans Pool and the Reclamation Pond and states that their designations are specifically included in the Plan to indicate to potential developers that their nature conservation interest must be taken into account when development proposals are being put forward. It is our view that the proposed lay-down area and omission of the potential environmental impacts on the Reclamation Pond from the ES contravene the *'Local Plan'*. The reason cited by the environmental consultants for the omission of the Reclamation Pond is that, as it is to be cleared and infilled by others, there will be no "ecological receptors" to consider. This is clearly nonsensical, as the infilling of the Reclamation Pond, if it goes ahead, will take between 8-10 years until the completion of the Cowpen Bewley compensatory site. There will, therefore, be a significant area of water left for some years to come. It is also known to have Water Voles present, in addition its major ornithological interest. This is a significant omission from the ES.
  - **Because of the close proximity of Dormans Pool, we are extremely concerned about adverse impacts on this site,** particularly changes in water level and contamination by pollutants (through groundwater or airborne). The Environmental Statement concludes that there will be minimal adverse impacts on this part of the SPA but we remain to be convinced. It is unclear whether a full site investigation has been carried out to identify, as fully as possible, the location of all major contaminants (eg heavy metals).
  - **We are very concerned about contaminants on the site,** particularly as it is intended to reduce existing levels by pushing material into the Reclamation Pond to create a level, development platform. It is quite possible, bearing in mind the history of this area, that there are hidden pockets of heavy metals and other contaminants and these, when disturbed, could have a serious adverse impacts on the Reclamation Pond and adjacent Dormans Pool. The environmental consultants minimise the potential impacts from contaminants.
  - **The Reclamation Pond contains protected species,** including Water Vole, which means that there are legal implications for the developer if he knowingly disturbs or destroys protected species or their habitats.
  - **We are concerned about future TBC access to the upper car park at Dormans Pool and the Reclamation Pond,** which our members watch on a daily basis and undertake the monthly WeBS counts. Much of the ornithological data used by the environmental consultants has come from the TBC's database, underlining just how much we contribute to continuing knowledge of the birds of this important area. Thor Cogeneration has given us a verbal assurance that TBC access will be maintained during and after construction and that a 'gap' could be left in the bund to gain access to the Reclamation Pond.
  - **There is little in the Environmental Statement in terms of mitigation to reduce the environmental impact of such a large development.** Building a bund and have implementing site practices are relatively insignificant measures. There is no mention of what condition the lay-down area is to be left in following plant commissioning – an open, sterile hard-standing area, car park or storage area? This would be unacceptable for such a huge area and, in a multi-million pound development, it would be possible to fund the retention of the area in a more ecologically-friendly condition, eg creation of pools as breeding sites for Little Ringed Plover and other similar species.

- **In this age of concern about the environment and global warming, we find it a contradiction in terms that it is proposed to develop a site of such national ecological importance with a development that purports to be environmentally acceptable.** The energy plant will produce additional emissions of Nitrogen Oxide, Carbon Dioxide and Carbon Monoxide and will have discharges into the Reclamation Pond and, ultimately, the River Tees.

### **3.0 DETAILED COMMENTS ON THE ENVIRONMENTAL STATEMENT**

- 3.1 Our detailed comments are outlined in Table 1, which we hope you will find useful. For clarity, we have referenced the page and paragraph numbers to which our comments relate.
- 3.2 Our response focuses solely on ornithological issues and concerns – our area of expertise.

### **4.0 FURTHER CONSULTATION AND MONITORING**

- 4.1 We would welcome the opportunity to be involved in any further consultations with Thor Cogeneration and their environmental consultants.
- 4.2 TBC can offer ornithological monitoring services using highly experienced people with a vast local knowledge.

**TABLE 1**  
**TBC'S DETAILED COMMENTS ON THE ENVIRONMENTAL STATEMENT**

PAGE NO	PARA	TBC'S COMMENTS	RECOMMENDATIONS
<b>INTRODUCTION</b>			
1	1.1	Stockton-on-Tees Borough Council granted Planning Permission to infill the Reclamation Pond in 2004. The TBC was the only objector to the Application by ICI, due to the <i>'North Tees Agreement'</i> of 1996. The site has received Outline Planning Permission for industrial development and is allocated as industrial development land within Stockton-on-Tees Borough Council's <i>'Local Plan'</i> .	The Planning Approval to infill the Reclamation Pond was subject to a number of rigorous Conditions. It is vital that these are monitored and completed to the entire satisfaction of the Council and local nature conservation bodies prior to any development proceeding, particularly the compensatory sites at Port Clarence Pool and Cowpen Bewley Landfill.
<b>THE DEVELOPMENT</b>			
9	2.3	Site selection appears to have been solely on economic and operational grounds: there is no mention in the ES of selection based on the least environmentally damaging location.	Request further details from the Environmental Consultants concerning site selection criteria - we suspect that the process was based on <i>"this is the site, now undertake an EIA"</i> .
10	2.4	<b>The land is to be prepared for development by Impetus Waste Management.</b>	<b>In the spirit of the <i>'North Tees Agreement'</i> the land area should be that solely required for the specific industrial development and not used as a reason for infilling the Reclamation Pond earlier than is required.</b>
10	2.5	<b>It is stated that, during construction, 31 hectares of land will be required for <i>"lay down"</i> (i.e. short-term storage and fabrication activities required for building the plant), as shown in Fig 2.1.</b>	<b>We find this totally unacceptable. It more than doubles the size of the development area. The temporary <i>lay down area</i> will destroy the western sector of the Reclamation Pond and this is contrary to the spirit of the <i>'North Tees Agreement'</i>. We believe that this is being used as a means to prematurely infill this nationally important ornithological site.</b>
11	Fig 2.1	<b>Site access is shown off Hunstman Drive and via the upper track at Dormans Pool, which has been used by TBC members for over half a century.</b>	<b>We request clarification on future TBC access to Dormans Pool and the Reclamation Pond, both of which are watched by our members on a daily basis, including the monthly WeBS counts.</b>
18	2.6.12	There will be emissions of NO, NO <sub>2</sub> , CO and CO <sub>2</sub> arising from the energy production process, discharged from 75m high stacks.	We request assurances that these will be within accepted EU limits and will not have a detrimental effect on the adjacent SPA, including Dormans Pool.

PAGE NO	PARA	TBC'S COMMENTS	RECOMMENDATIONS
18	2.6.12	It is stipulated that excess water from the firewater pond will pass into the Reclamation Pond.	There is almost an inference that, because it is proposed to ultimately infill the Reclamation Pond, then any adverse impacts are of no major concern. Our view is that that the residual area of water body remaining following final development should be of as high ornithological value as possible, rather than being used as a 'dumping ground'. We request assurances that any discharges will not adversely affect the Reclamation Pond or Dormans Pool.
<b>LAND-USE, PLANNING AND ENERGY POLICIES</b>			
22	3.3	Regarding the ornithological surveys required under Condition 7 of the Planning Approval, who is to pay for, manage and implement these: Impetus or the developer? What is the collected data to be compared with prior to the start of the work? What mitigation is to take place, if required, and who is to pay for this? There appear to be some 'grey areas' here.	The surveys must be implemented immediately after construction of the compensatory sites and it will be incumbent on the Local Planning Authority to ensure that this is the case. The TBC will be carrying out its own monitoring and could be responsible for this on a more formal basis, subject to an agreement with the body responsible.
22	Fig 3.1	The boundary of the Phase 1 sector shows infill right up to the line of the existing SPA on the eastern side of Dormans Pool. This is surely incorrect.	Developers or their consultants to clarify.
23	3.5.1	PPS1 sets out policies for delivering sustainable development, including the effective protection of the environment. How does this sit with the plant emissions of NO, NO <sub>2</sub> , CO and CO <sub>2</sub> ?	
23	3.5.2	PPS9 sets out national policies for the protection of biodiversity through the Planning System. Ironically, this development will destroy an area of major biodiversity interest.	
27	3.7.1	The 'Tees Valley Structure Plan' contains policies (ENV3A, ENV4 and ENV7) relating to the protection of wildlife and nature conservation at nationally important sites and threatened species.	The data TBC supplied reflect the national ornithological importance of the Reclamation Pond. Water Vole has been seen recently at the site by 2 of our members. Water Vole is a protected species under the 'Wildlife & Countryside Act'. Further survey work needs to be carried out and an Action Plan prepared for dealing with this issue.

PAGE NO	PARA	TBC'S COMMENTS	RECOMMENDATIONS
29	3.7.3	Para 2.18 of the Stockton-on-Tees <i>'Local Plan'</i> states that 135 ha of land at North Tees Pools are suitable for hazardous industry but draws attention to Dormans Pool and the Reclamation Pond as sites supporting regionally and nationally important numbers of birds. It states that <i>"these designations are reflected in the Local Plan in order to indicate to potential developers that the nature conservation interest of the land must be considered when development proposals are put forward."</i>	Despite this, it is proposed to allocate a huge, transient <i>"lay down area"</i> , which will destroy important terrestrial and aquatic wildlife habitat and is in direct contravention of the Local Plan.
<b>GEOLOGY, SOILS AND HYDROGEOLOGY</b>			
79	6.3.6	The ES states that the shallow soil material to 1m depth is contaminated by various metals and is significantly more contaminated than the underlying slag.	Has a full site investigation been carried out to ensure that when the surface area is disturbed there are no 'hidden' areas of toxicity that may ultimately cause adverse impacts on Dormans Pool and the residual Reclamation Pond? If not, we suggest that this is done as a matter of urgency.
82	6.4.1	Excavated materials not used on site will go to landfill. This brings into question sustainability and environmental issues.	
84	6.6	Site drainage will discharge into the Reclamation Pond <i>"under controlled conditions"</i> .	This may have adverse impacts on water levels. The developers should demonstrate what effects run-off will have.
<b>WATER QUALITY</b>			
85	7.1	We welcome the use of an air-cooled condenser to prevent vapour clouds, which would cause significant problems to birds moving between Saltholme/Dormans Pool and the Reclamation Pond, notably wildfowl, gulls and terns.	
87	7.2.1	<i>"Dorman's Pools and the Reclamation Pond are of significant ornithological value and have been used as a bird watching facility by the Teesmouth Bird Club for over 25 years."</i> Our use of these sites extends back much longer than this to over 60 years. TBC members have exclusive, special permission to access both sites.	

PAGE NO	PARA	TBC'S COMMENTS	RECOMMENDATIONS
<b>ECOLOGY</b>			
97-98	8.2.3	We fail to understand the full meaning of the statement "... <i>but the ES is not burdened with reasons for scoping out every improbable notion that might be conjured up.</i> " An ES, above all, is intended to portray an objective assessment of impacts. Statements such as this are dismissive and do not inspire confidence, particularly when there are some significant omissions from the document (eg Green-winged Orchid and Water Vole).	Clarification required.
100	8.2.3	<b>'Prediction of Impacts – Special Considerations in this ES':</b> Because the footprint of the site, its "lay down area" and the Reclamation Pond will be cleared for industrial development it is stated that the ecological receptors of impacts will be almost totally lacking.	We consider this to be unacceptable. A significant section of the water area of the Reclamation Pond will remain for many years until the completion of the Cowpen Bewley compensatory site and, because of this, the environmental impacts should be considered, particularly as it contains nationally important, protected species (e.g. Water Vole).
101	8.2.4	Comments concerning the validity of background data are acknowledged but can also be applied to data collected on site by the environmental consultants, particularly when the timing of the surveys is taken into account (September and early winter). These would not give a complete picture (e.g. breeding birds).	
Following Page 104	Fig 8.1	This has omitted the TVWT Reserve at Coatham Marsh.	
106	8.3.3	<b>'Non-Statutory Designated Sites':</b> The only reason the Reclamation Pond has not been designated is due to the terms of the <i>'North Tees Agreement'</i> . TBC is firmly of the opinion that this site should have been designated many years ago and included in the Teesmouth and Cleveland Coast SPA. Its lack of designation does not belie its major national, regional and local importance, as the data supplied by TBC demonstrate. The TVWT describes the Reclamation Pond as a prime site in the <i>'Standing Open Waters'</i> category of the <i>Tees Valley BAP</i> .	

PAGE NO	PARA	TBC'S COMMENTS	RECOMMENDATIONS
106	Table 8.3	Marsh Warbler is a rare visitor, with only 3 singing birds being recorded from Haverton Hole over the past 20 years, the first being in 1987.	
Following page 109	Fig 8.3	This Table is very misleading, as it lists only a relatively small number of protected species and many records are missing, including some provided by the TBC for the Reclamation Pond (e.g. Water Vole, Brown Hare, Water Shrew, Roe Deer, Weasel, Stoat, a range of scarce butterflies and moths and a comprehensive list of Schedule 1 bird species). Presumably this is because it is assumed that the area is to be filled in and, therefore, an assessment of environmental impacts is not warranted.	It is a criminal offence under the relevant Wildlife Acts to knowingly damage or disturb protected species, such as Water Voles. This element of the ES needs to be re-worked to portray a more accurate picture, so that the true environmental impacts can be assessed.
114	8.3.5	<i>'Plant Species of Note'</i> : None of the orchid species that grow on the basic slag areas between Dormans Pool and the Reclamation Pond is listed, e.g. Green-winged, Fragrant, Spotted and Northern Marsh Orchids. The true picture is, again, very incomplete.	Amend ES – update.
116	8.3.6	<i>'Water Voles'</i> : Two TBC members have independently recorded Water Vole at the Reclamation Pond, one being in Spring 2004 and the second on 4th December 2004: the latter was seen swimming parallel to the grassy edge of the 'bulge' of old infill about 2m out in the north-western corner. The former was seen in the narrow channel from the upper car park.	Amend ES and consider legal implications of habitat destruction.
117	8.3.7	<i>'Wintering and Passage Birds on the Construction Site'</i> : The area does not, as stated, hold locally important numbers of Hen Harriers. This is now a very rare species in the Tees Estuary and is more often recorded on passage from upland areas.	Amend ES.
118	8.3.7	<i>'Breeding Birds at Dorman's Pools'</i> : Spotted Crake has never bred at Dormans Pool but has bred in Cleveland in at least 1899 and 1900.	Amend ES.
120	8.3.7	<i>'Breeding Birds at Reclamation Pond'</i> : Reed Bunting is not the only 'Red List' species to breed and so gives an incorrect picture. The other species are: Grey Partridge, Skylark, Song Thrush, House	Amend ES.

PAGE NO	PARA	TBC'S COMMENTS	RECOMMENDATIONS
		Sparrow and Linnet.	
121	8.3.7	<b>'Wintering Birds':</b> Nationally important peak counts for the Reclamation Pond cite only Smew as being of significance. The records we provided to the environmental consultants clearly indicate that the site also holds nationally important numbers of Gadwall and Shoveler.	Amend ES.
123	8.3.7	<b>'Flight Paths':</b> The statement that "... most birds flying between Dorman's Pools and Reclamation Pond pass over the narrow neck of land at the south-western corner of Reclamation Pond." This statement is incorrect and is based on only 2 surveys undertaken in early November and early December 2006. In fact, wildfowl, gulls and terns move between Saltholme/Dormans Pool and the Reclamation Pond along the entire western perimeter. For example, in 2006, breeding Common Tern numbers increased dramatically on Saltholme as a result of the new lake and islands constructed by the RSPB as part of its new reserve and, during the summer, birds had a preference for fishing on the Reclamation Pond, which they accessed along the entire interface between the 2 sites. Gulls, wildfowl and other terns regularly do the same.	This statement gives an incorrect perception of the impact that the development will have on flight lines. Conduct further research and amend ES.
124	8.3.7	<b>'Amenity Use of the Area by Bird-watchers':</b> <ul style="list-style-type: none"> <li>• We point out that not only have we used the areas to the west of the proposed development site but also the Reclamation Pond itself for well over half a century. We will expect our current access arrangements to be respected.</li> <li>• "... lay-bys on the A187" should read "A178".</li> <li>• The "TBC hide overlooking Seal Sands" is not TBC-owned but is the property of Natural England.</li> </ul>	Amend ES and confirm future access agreement.
124	8.4.1	The statement that <b>"the proposed location of the power station also avoids obstruction to previously recognised bird flight-lines across the narrowest part of the isthmus between Dorman's Pools and the</b>	Reassess impacts on birds moving between the 2 water bodies.

PAGE NO	PARA	TBC'S COMMENTS	RECOMMENDATIONS
		<i>Reclamation Pond.</i> " This is incorrect (see above).	
125	8.4.2	<p>We are concerned about the impact of large numbers of construction workers and vehicles on site and how these will be managed to avoid unnecessary disturbance to birds on Dormans Pool and the Reclamation Pond. How, for example, is it intended to prevent workers climbing over the bund at lunch-times. There is little doubt that with so many on site and the movement of HGVs the tranquil and enjoyable leisure pursuits of birdwatchers will be severely compromised.</p> <p>We are also very concerned about the development of this site alongside the future opening of the RSPB's new Saltholme Reserve, which it is hoped will attract up to 100,000 visitors a year. This Reserve will, in reality, have 3 active waste tips and 2 heavy industrial developments within a few kilometres and this will significantly and adversely affect the perceptions of visitors to the area.</p>	A more thorough mitigation approach required here.
127	8.4.3	<i>'Other Mammals':</i> Water Voles are present on the Reclamation Pond (see comments for p116 above).	More thorough research and site survey work required.
129	8.4.5	The proposed bund along the entire length of the development site will act as a barrier and prevent access to TBC members to the Reclamation Pond.	Provide a 'gap' somewhere close to the upper Dormans Pool car park for ongoing access to the Reclamation Pond.
130	8.5.1	<i>'Impacts to be considered':</i> We find this section of the ES 'woolly' and inconclusive. The consultants again dismiss any consideration of environmental impacts on the construction site and " <i>lay down area</i> " simply because the area is to be cleared by others and the Reclamation Pond has Planning Approval for infilling in the future. As the consultants state: " <i>Material from the site will be used to infill at least the southern part of the Reclamation Pond</i> " and argue that the area will, therefore, have no ecological receptors " <i>worthy of further consideration</i> ". They then go on to list what impacts they would have considered!	This is not acceptable and the ES needs to be expanded to include environmental impacts on the Reclamation Pond arising out of the development. We point out that it may be 8-10 years or more before the Reclamation Pond is completely infilled and, during this time, it will remain as an important component of the Tees Estuary. Since the ' <i>North Tees Agreement</i> ' of 1996 and Planning Approval of 2004, new data has become available on the site, which underline its major ecological importance and which must be considered as part of the ES. This data was provided by TBC to the environmental consultants.

PAGE NO	PARA	TBC'S COMMENTS	RECOMMENDATIONS
130	8.5.1	Water Vole has been missed off this list, in addition to other bird and animal species contained in data, which we provided to the environmental consultants. This has legal implications.	Amend ES and, accordingly, the environmental impacts.
131	1 8.5.1	The effect of the new plant on flight lines will be to partly sever the vitally important air space link between Saltholme/Dormans Pool/Seal Sands and the Reclamation Pond, especially for feeding Common Terns and wildfowl, which commute between these areas.	Undertake further research.
132	8.5.2	<i>'Summary of Impacts: 1 – Water Vole'</i> : We provided Water Vole data for the Reclamation Pond to the environmental consultants but this has not been included in the ES (see our comments for page 116). To state that there will be "no residual impact" on this species is incorrect and misleading.	Amend ES and potential impacts on this species.
134	8.5.2	<i>'Summary of Impacts: 7 &amp; 8: Breeding Black-necked Grebe'</i> : Black-necked grebes are not "... commonly present at the Reclamation Pond in breeding plumage". The species is, in fact, a nationally rare breeding species, which makes a breeding attempt at this site in 2004 very significant. The southern part of the Reclamation Pond, which is to be destroyed under this development, contains ideal breeding habitat for this species and is where the failed 2004 attempt took place. This development will permanently prevent any future breeding attempts. The statement that the predicted impact on Black-necked Grebe is "extremely unlikely" is, therefore, erroneous. There is a record of an even rarer Schedule 1 species, Slavonian Grebe, that attempted to breed on the Reclamation Pond in 2005 – this is believed to be the first ever breeding attempt in England.	Reassess impacts and amend ES.
134	8.5.2	<i>Summary of Impacts: 9 &amp; 10: Wintering and Passage Birds on Dorman's Pools</i> : The first paragraph of this section is 'woolly' and contradictory, on the one hand stating that "...some reduction of fitness and possibly over-winter survivorship is 'probable'", whilst on the other concluding that "...it is possible that this will result in no significant impact."	Amend ES for clarity.

PAGE NO	PARA	TBC'S COMMENTS	RECOMMENDATIONS
<b>APPROPRIATE ASSESSMENT</b>			
151	8.6.5	Flight paths to the Reclamation Pond have again been dismissed as not worthy of detailed study due to the fact that the former site is to be filled in (see comments for para 8.5.1 above). Movement is not <b>"...restricted to the narrow isthmus between the two water bodies"</b> but occurs along their entire length. Construction of the plant will have an effect on flight lines.	Amend ES.
158	8.7	<b>'Conclusions':</b> In view of the close proximity of the plant to the SPA we consider an <b>Appropriate Assessment</b> to be essential.	Confirm TBC's request for an <b>Appropriate Assessment</b> to the DTI.
<b>TRAFFIC AND TRANSPORT</b>			
207	11.3	Access off Huntsman Drive is to be used for access to the development. We wish to be assured that TBC access to Dormans Pool and the Reclamation Pond will continue both before and after construction.	Confirmation of continued access to TBC
<b>APPENDICES</b>			
8.1-1	Appendix 8.1	There is no reference in the Ecology References to the two sets of comprehensive TBC data provided for the ES.	

**Note: Comments in bold font are of greatest concern.**

**PHOTOGRAPHS**



RECLAMATION POND AND DORMANS POOL: Showing Saltholme (left) and the River Tees (right). The development site is on the elevated land just left of centre, between Dormans Pool and the Reclamation Pond, between which there is a major flyway.



OPENING OF THE TBC'S DORMANS POOL HIDE 2003



RECLAMATION POND (JULY 2003)



RECLAMATION POND FROM THE UPPER CAR PARK