

10th June 2011

Sue Penaluna
Devon County Council
Topsham Road
Exeter
EX2 4QD



Our Ref: 402.0036.00350: Road

Your Ref: DCC/2975/2010

Dear Mrs Penaluna

Application Reference DCC/2975/2010

Development of the New England Resource Recovery Centre, near Lee Mill, Devon, to include an Energy from Waste facility with a capacity of 275,000 tonnes per annum of residual Municipal Solid Waste (MSW) and Commercial and Industrial Waste (C&I) with bottom ash recycling, a non hazardous landfill; and associated visitor centre, ancillary offices, welfare, parking facilities, weighbridge/wheel wash; also new access road linking into the A38 at Lee Mill with new river crossing over River Yealm and associated aftercare and landscaping improvements across the whole site with associated woodland management plan.

Further to our meeting at County Hall on 20th May, please find the following information submitted in respect of the construction techniques likely to be employed during the construction of the access road. It should be noted that in the absence of planning permission, no contractor has been formally instructed on this project. The following therefore represents industry best practice, experience on other similar projects and an undertaking on behalf of the applicant to implement sustainable methods of road construction.

General Good Practice

In planning the construction methodology of any road scheme it is essential to establish clear sustainability objectives from the design phase through to the construction phase. At the outset, a 'Plan-Do-Check' framework to address and establish priorities and assess progress is key. In addition to this Sustainable Development targets for climate change reduction measures and sourcing natural materials from sustainable sources should be developed. Targeting to exceed all legislative regulations and adopting monitoring systems to ensure compliance is standard practise.

This can be implemented by preparing a 'Construction Environmental Management Plan (CEMP), designed to show how the Environmental System and Procedures Manual apply to the specific project. The Environmental Procedures Manual describes how the Environmental Management System (EMS) is implemented to meet the specified contractual, regulatory and statutory requirements, environmental impact statement, mitigation measures and planning conditions.

All personnel, including staff and operatives, Sub-contractors and self-employed, are required to have induction training on Health & Safety, Quality and Environment prior to starting work. The CEMP will describe the project organisation and details individual roles and responsibilities, and it is assumed that it will be included as a requirement in a condition should planning permission be granted. Its implementation will establish the environmental procedures that will be adopted on site and outlines the key performance indicators that will be used throughout the construction phase of all elements of the scheme.

Consideration will also be given to CEEQUAL & Considerate Constructors Scheme (CCS) accreditation

Site Specific Proposals

It is in the interests of the developers, the contractors and other interested parties that mitigation of potential impacts is identified at an early stage in the implementation of the construction phase. In the case of New England this will begin with ensuring that the road alignment is clearly defined: the route of the road (carriageway width of 8m) and the width of the application boundary will be pegged out in strict accordance with the application plans using GPS.

It is proposed that would commence from the Southern gaining access from the existing quarry via New England Road. This would initially involve excavation and re-working of the existing quarry base, work necessary for the main EfW plant itself. Once sufficient site won material is available, initial clearing in the area of the new access road could commence.

In order to facilitate construction, sections of approximately 100m in length will be cleared of all vegetation until the full length of the new road is cleared. This will be undertaken with brush cutters and chain saws along with mini-excavators following the completion of any further ecological surveys that might be required.

The extent of clearance would be kept to a minimum in accordance with the strictly defined extent of the road alignment illustrated on Plan 0350/102 (October 2010). The red line boundary of that plan illustrates that the width of the corridor is generally 15m, exceeded in places by the location of the proposed surface water ponds. In actuality the cleared width will generally be less than 15m.

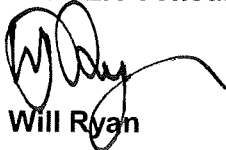
In terms of construction of the road itself the following measures will be undertaken:

- stockpiling of construction materials will only take place within the red line boundary;
- fill materials will be sourced from the creation of the development platform of the main building and/or the formation of the landfill;
- all ancillary site facilities will be located within the application boundary;
- all mitigation measures proposed in respect of noise, vibration, hydrology, ecology and archaeology will be implemented as a fundamental part of the road construction process;
- the early provision of filter drains and suitable collection systems will ensure run-off from the construction area does not impact the local watercourses;
- site clearance will take place at times in accordance with an approved programme) to ensure avoidance of bird nesting/bat breeding seasons;
- all aspects of the surfacing (with blacktop) will take place within the application boundary.

I trust that this is acceptable for your needs, but should you require any further details on any of these matters, please contact me.

Yours sincerely

For SLR Consulting Limited

A handwritten signature in black ink, appearing to read 'Will Ryan', with a stylized flourish extending to the right.

Will Ryan

Principal

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Encs.

