

RESIDENTS AGAINST THE CF3 INCINERATOR – DNS APPLICATION 3236340  
HEARING STATEMENT SESSION 3  
ECOLOGICAL ISSUES

## **INTRODUCTION**

This document is the Residents against the CF3 Incinerator's Hearing Statement for Session 3 -Ecological Issues.

The ecological impacts of the proposed development's pollutant emissions and water runoff on the Gwent levels and their sensitive ree network are significant concerns of the neighbouring communities.

The residents are beneficiaries of the biodiversity in this area. They vigorously support any protection and enhancement initiatives such as those included in National policy (PPW chapter 5), the Local Development Plan (policies KP16, EN5, EN6, EN7 & Green Infrastructure Plan).

We do not have the expertise to discuss the technical assessments of the potential impacts and will defer to NRW, who do.

With respect to this hearing, we would like to provide the following in response to the Inspector's Initial questions/Discussion points for this session.

### **1. Surface Water and Watercourse Management**

#### **Questions 1 & 2**

We recognise there may be site constraints, which may impact a satisfactory SuDS layout. We would like to understand how these site constraints may have impacted the proposed layout and if there are likely to be any operational issues.

We note the SuDS technical drawing has a number of light blue arrows that denote Exceedance Flows. These imply that the SuDS has reached a limit and cannot manage the volume of surface water for whatever reason.

- Does this mean that surface water will then be discharged into the reens?
- Who will be responsible for maintaining the SuDS performance, regular inspection and maintenance?

#### **Questions 3 & 4**

We have not been party to these discussions and are not in a position to comment.

### **2. Emissions to Air – Impacts on Gwent Levels SSSIs and other sensitive ecological receptors.**

#### **Question 1**

We have read the assessment and understand that it confirms there is an impact caused by the emissions to air on the Gwent levels.

Our understanding of the discussion between NRW and the applicant is on the degree or severity of the impact.

To us this implies there are already significant emissions to air from other sources impacting the Gwent levels.

We do not understand why there is any discussion about adding another source of emissions to the current levels of emission.

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**Question 2**

No comment as the question is directed to NRW.

**3. Protected Species; bats; dormouse; reptiles/amphibians**

**Questions 1, 2 & 3**

Our observation is, any land or area that has been neglected for over 10 years, as is the case with the development site, is very likely to have been inhabited by some or all of the protected species in question.

We understand that conditions can be attached in an attempt to mitigate some of the impacts.

In the absence of any other method, should the development be deemed acceptable, we request any condition attached is comprehensive, rigorous and scrutinised to ensure a minimal level of impact.

**4. Habitat/biodiversity maintenance and enhancement**

**Question 1**

No comment as the question is directed to Cardiff Council

**CONCLUSION**

We are of the opinion the ecological impacts of the proposed development site, which is in such close proximity to the sensitive Gwent Levels, are unacceptable and incompatible with the “protect and enhance” biodiversity policies, applicable to this area, at National and local level.

There is no nett benefit that can be attached to this development.

We regard it as a threat to the biodiversity of this area.