

Annex E. Environment and Tourism

Preface

This paper will show, first, that BCC's strategy for a 300,000 tonne per year mass burn incineration (MBI) installation at Lower Greatmoor Farm (LGF), if it goes ahead, will have serious negative impacts for environment and tourism. Tourism in North Bucks generates more jobs and GDP than farming and forestry. But it is linked to farming and forestry in that many tourist destinations benefit from a public perception of this general area as, if not quite a rural idyll, about as close to such an idyll as one is likely to get, tucked as it is between the major conurbations of Milton Keynes, Aylesbury, Bicester and Oxford. Second, this paper will explain the legal implications of endangering certain wildlife species, and the associated mandatory consultations that are required as part of the planning process.

Sites of Special Scientific Interest (SSSIs) and Biodiversity Action Plans (BAPs)

Most of Doddershall and Grendon Woods, both SSSIs, are less than half a kilometre of the proposed access road to the planned LGF mass burn incinerator (see also Annex C, Transport). This distance is legally significant because it means that Natural England, a DEFRA Agency, has to be consulted to ensure that the SSSIs are not jeopardised. The evidence is that they will be so jeopardised, and there are local precedents which have rejected proposed developments that have been judged to be ecologically unacceptable.

These ancient woods are home to the spectacular Purple Emperor, the rare Black Hairstreak, also the Purple, Green, and White Letter Hairstreaks, the White Admiral, the Dark Green Fritillary, the Small Heath and the Grizzled and Dingy Skippers – all **butterflies**. More specifically, the old railway track bed that leads from the A41 to LGF is good for butterflies because it is relatively grass free and is warmer for the developing caterpillars. It is the opinion of a prominent local butterfly expert that just the road development (let alone the incinerator itself) would wipe out the Grizzled and Dingy Skippers, the Small Heath, and the Black Hairstreak from this site.

Is that important? It is, because they are all BAP species. These species are so endangered that they have Biodiversity Action Plans (BAP) specifically designed to preserve them, and BCC, like all county councils, is specifically charged with responsibility for their preservation.

There is at least a third BAP species that has not yet been found in Doddershall and Grendon Woods but is likely to be sighted soon. This is the Brown Hairstreak, a species which has the curious combination being extremely rare and endangered but is picking up well on the effects of global warming and is spreading strongly though from a low base. It has already been recorded in Sheephouse Wood very close by, but not so close as the 500 metre legislative threshold. The butterfly expert already mentioned has implied that he will eat his hat if it is not sighted at Doddershall and Grendon Woods in the next couple of years, i.e. between now and when the road is due to be given planning permission by BCC.

BAP species of **birds** that are resident breeders or migrants in Doddershall Wood are as follows: a) Red List – Song Thrush, Dunnock, Marsh Tit, Bullfinch, Cuckoo, Lesser Red Poll and Turtle Dove (on this last species, see Appendix II below); b) Amber List – Mistle Thrush, Green Woodpecker, Lesser Spotted Woodpecker, Willow Warbler, Whitethroat. Experts have already said that exhaust fumes from lorry traffic on the road will not quickly dissipate in these woods and will be detrimental to these species.

SAVI's research on **bats** will make up a separate paragraph and possibly an Appendix at a later date. We already know there are five or six species worthy of note.

The law does not allow BCC to grant permission to build an access road that is likely to destroy a BAP species, or indeed several of them. The process is clear: during the consultative process which is due to happen after 28 September 2009, Natural England, a DEFRA agency, as the appointed guardian of SSSIs will be asked, as a statutory consultee, to report on whether they will be endangered. Natural England has its own experts, but they are likely to consult local butterfly experts, and this is likely to

include the same experts that SAVI has also consulted in its research for this paper. Together they are unlikely to miss the fact that at least one BAP species would be threatened within at least one SSSI if development of the access road went ahead, and would report to BCC accordingly. BCC could not ignore such a report, and could not then grant permission for the access road to go ahead. This is not a case of BCC taking a line of least resistance; it is the only line they are allowed to take.

We hope that BCC can use the information that we have compiled for them in this paper. We note that the Scoping Report and physical inspection of the disused railway line that they commissioned was carried out during the winter of 2008/09 when most of this could not be observed.

Pollution of the wider environment

No such inexorable iteration seems to attach to the mass burn incinerator itself. There are just “concerns”, but even though they are not yet girdled by legislation like the butterfly-friendly old railway track, these concerns seem just as alarming to the man on the Aylesbury omnibus.

Nitrous oxide, particulates and mercury are just three things that come out of the top of the chimney of a mass burn incinerator. Nitrous oxide dissolves in rain and falls as nitrogen pollution, promoting rank grass growth which is not good for butterflies and many other insects, all at the bottom of complex and valuable food pyramids. Particulates are also thought to be detrimental to all species, including humans, but there is no direct evidence (for species other than humans) - see also Annex B. Mercury (remember those batteries that you know you should dispose of properly but like most of us you just throw them in the household rubbish bin) is emitted in gaseous form from the chimneys of mass burn incinerators. No less than 90 tonnes of elemental mercury, one of the most toxic metals known to man and a cumulative poison (i.e. once it's in you, you can't get rid of it), lands on the Arctic every year. It's thought to come largely from mass burn incinerators. If that much lands on the Arctic, how much lands closer to home?

BBOWT (Bucks Berks and Oxon Wildlife Trust, managers of Finemere Wood close to LGF) recognises that waste treatment methods can have significant indirect impacts on wildlife through diffuse pollution and through their impact on climate change, and it believes that the key focus for decision makers should be to reduce the generation of waste and to encourage recycling. BBOWT too has “concerns”.

Farms in Higher Level Environmental Stewardship (HLS)

In this traditional and largely grassfed livestock farming area there are many farms in the Entry Level and Higher Level Environmental Stewardship Schemes (ELS and HLS). SAVI is in the process of finding out just how many within a five mile radius of the planned mass burn incinerator at LGF, but whatever the number is, it's increasing rapidly. ELS and HLS are rather successful and are driven by popular demand, by the voters who ultimately pay for them through DEFRA and Natural England. ELS and HLS promote landscape and biodiversity, and improved access to the public to enjoy them.

It seems obvious that the increasing popularity of this access will be jeopardised by a mass burn incinerator that will, in the public's perception, pollute the view and the air. This is hardly “joined up government”.

The Scottish Precedent and “landfill in the sky”

The Scottish Green Party is opposed to MBI on environmental and health grounds. They say MBI is simply “landfill in the sky”. On 11 July 2009 the Scottish Parliament endorsed Green opposition to plans for a new generation of MBIs. The Greens favour ATT. They recognise that ATT is much more efficient than MBI at EfW (a factor that in itself is more environmentally friendly) and that ATT has other advantages too.

Tipping Point

Several local farmers want to install wind turbines and are in the process of applying to do so. But the BCC planners say “No, they're too high and ugly”. So if the chimney goes up, arguably much more

offensive than a wind turbine, this planning block will be effectively removed. And the public will lose interest in fighting to keep the beauty of North Bucks.

Tourism

Waddesdon Estate is arguably the flagship of North Bucks tourism. The Estate Manager seems sure that a mass burn incinerator close by at LGF would have a negative effect on gate numbers, and the owner of Waddesdon Estate has written directly to BCC to express his concern. At that single site, a lot of jobs are at stake. SAVI has not yet interviewed the managers of other local tourism attractions such as the Railway Centre, Quainton Windmill, Claydon House, Bletchley Park, Boarstall Tower, Stowe Landscape Gardens, Rare Breeds Park at Broughton near Aylesbury, the Butterfly Trails in Bernewood and Finemere Woods, the several bird sanctuaries, Calvert Sailing Lakes, or just the pub owners who serve drinks to thirsty walkers who enjoy the Quainton Hills and the Grendon Woods, but we expect a similar response. As with Waddesdon, so also for these, the bottom line is lots of jobs at risk.

BCC's planning procedure seems not to take such factors into account in a systematic, measured and economically calculated way, or if they do such calculations have not been made public. We do see papers talking up the efficiency of the proposed mass burn incinerator itself and the jobs it will create, but what we don't see is how these are balanced against the sort of losses which SAVI sees as inevitable.

Appendix I. Butterflies

These notes are on the butterflies that have been recorded in three of the 1km grid squares that the rail line crosses - but not all 5; and only to an accuracy of up to 1km from the line. We don't record with sufficient accuracy to say if all these species have been seen within 500m - but they have all been recorded (most of them repeatedly) within 1000m since 2000.

At the Woodham Industries end in SP7018

Large Skipper, Green Veined White, Meadow Brown Marbled White and **Small Heath** (of these Small Heath is a BAP species and worthy of special note).

Nearer to Grendon and Doddershall Wood in SP7020

Large Skipper, Small Skipper, Essex Skipper, **Grizzled Skipper**, Brimstone, Small White, Green Veined White, Orange Tip, Small Copper, Purple Hairstreak, **Black Hairstreak**, Brown Argus, Common Blue, White Admiral, Red Admiral, Painted Lady, Small Tortoiseshell, Peacock, Comma, Speckled Wood, Meadow Brown, Ringlet, Marbled White and **Small Heath** (of these Grizzled Skipper, Black Hairstreak and Small Heath are BAP species and worthy of special note).

Nearer to Grendon and Doddershall Wood in SP7020 and nearer to Finemere Wood in SP7121

Large Skipper, Small Skipper, Essex Skipper, **Grizzled Skipper**, **Dingy Skipper**, Brimstone, Small White, Green Veined White, Orange Tip, Small Copper, Purple Hairstreak, **Black Hairstreak**, **White Letter Hairstreak**, Brown Argus, Common Blue, Purple Emperor, White Admiral, Red Admiral, Painted Lady, Small Tortoiseshell, Peacock, Comma, Silver Washed Fritillary, Speckled Wood, Meadow Brown, Ringlet, Marbled White and **Small Heath** (of these Grizzled Skipper, Dingy Skipper, White Letter Hairstreak, Black Hairstreak and Small Heath are BAP species and worthy of special note).

Actually on the functioning rail line at approx SP711 210, there are still records for 8 species (seen from the road bridge) and these include Black Hairstreak and Small Heath. We can reasonably expect to find them about 500m away on the disused line I think.

For further info about BAP species and the pertinent legislation see the original HMG publication http://www.ukbap.org.uk/library/Plan_LO.pdf and the Bucks version <http://www.ukbap.org.uk/lbap.aspx?id=448>

Appendix II. Turtle Dove

Looking through past Bucks Annual Bird Reports, it seems that Calvert and the surrounding area is probably the last remaining stronghold of Turtle Dove in the county, with c9 pairs recorded in 2006.

Amongst the birds present during spring 2009 on the former railway line and in the scrub bordering it, about 0.8km north of the industrial buildings at Woodham, were Lesser Whitethroat, Sedge Warbler, Willow Warbler, Blackcap, Garden Warbler and Turtle Dove.

Turtle Dove is a red-listed BAP species, now rare in Buckinghamshire, with only one instance of confirmed breeding recorded in 2007 (most recent published County report) at Calvert. A pair was observed, indicative of a likely breeding attempt.

Nationally, Turtle Doves are estimated to have declined by over 50% between 1996 and 2006, and c85% between 1967 and 2006. Quoting from the British Trust for Ornithology / Joint Nature Conservation Committee for Breeding Birds in the Wider Countryside report of 2008:

"The CBC/BBS¹ trend is of severe declines in Turtle Dove abundance, beginning in the late 1970s and continuing to the present. Hunting during migration is a possible cause of the UK decline, to add to those related to agricultural intensification that have been postulated for other farmland seed-eaters (O'Connor & Shrubbs 1986, Krebs et al. 1999). Analysis of nest record cards and ringing data for farmland Turtle Doves suggests, although without statistical significance, that productivity per nesting attempt has increased while annual survival has fallen (Siriwardena et al. 2000a, 2000b, Browne et al. 2005). Browne & Aebischer (2004, 2005) conclude that Turtle Doves today have a substantially earlier close to the breeding season and consequently produce barely half the number of clutches and young per pair as they did in the 1960s. Thus, the recovery of Turtle Doves in Britain would benefit from the provision and sympathetic management of nesting as well as foraging habitats."

From the BTO Migration Atlas: "[Turtle Doves] require a mixture of hedgerows, shrubby woodland margins or bushy scrub for nesting, and open weedy patches of ground where they can forage for seeds". One of a pair of Turtle Doves was observed foraging on the former trackbed [from the A41 to Calvert] itself.

¹ CBC = Common Birds Census. BBS = Breeding Bird Survey.

These are both long-term annual monitoring projects, which record changes of abundance from one year to the next by surveying the same plots by the same method and same observer. The output is a population index [not an absolute number of birds] for each species / habitat / region. The headline index is used by national government in their Quality of Life indices, for example.

Common Birds Census was the original one, and required sufficient visits each breeding season to map individual territories - so number of areas covered was low. Breeding Bird Survey has much simpler and quicker survey methods, and thus coverage is vastly greater (several thousand 1km x 1 km squares each year). The two surveys were run side-by-side for a few years to ensure they gave equivalent trends. Fortunately they did, so the CBC index was "joined on" to the BBS index to give very long-term trends.