

Response by Horsell Common Preservation Society to the Appropriate Assessment of Potential Impacts of Proposed Waste Facility Sites in Surrey on Natura Sites.

These are Horsell Common Preservation Society's comments and observations on the above document.

- I. HCPS takes direction from English Nature. If English Nature is not satisfied with the contents of this document then neither are we.
- II. Please amend the site map to show the Horsell Common SPA. The other sites show the SPA designation. The report's incorrect mapping of Horsell Common gives the impression that it does not come within the SPA, which is totally incorrect.
- III. 3.4. No mention is given to the fact that access to Heather Farm is through Horsell Common. Any usage across the access would have to comply with the directive of Horsell Common and English Nature.
- IV. The report states that Heather Farm is liable to flood. This is an understatement as it was under water during August 2006 and has seriously flooded on several occasions. Heather Farm has a pump built in on site to help rid it of floodwater.
- V. There are concerns over the possible reuse of the existing buildings. Not least, the height of which are far less than required for a thermal treatment plant.
- VI. Please also refer to the height of chimneys recommended for thermal plants. The chart shows chimneys of 65 metres. This height would create a significant visual impact on the common.

Please consider the following quotations (VII & VIII) from the Appropriate Assessment Document and then read the comments IX through to XIII taking these quotations into account.

- VII. **Impact to European Designations 5.1.** (Page 27) "The main issue is, therefore, whether additional load will exceed the amount that the habitat can tolerate". Please refer to Table 5.1 for critical loads.
- VIII. **Effects on Natura 2000 sites 5.3** (Page33) "The findings suggest that critical loads of acidity are currently being exceeded by a considerable margin and that further deposition from thermal facilities may cause further increases in acidity in an already acidic habitat. Such increases could result in a decline in heather and other herb species at the Natura 2000 sites. Such changes would be

contrary to the conservation objectives for the Thames Basin Heaths SPA and the Thurley Ash, Pirbright and Chobham SAC which require the habitats to be maintained in a favourable condition.”

- IX. Horsell Common is acknowledged for its nature conservation value.
- X. Horsell Common falls within the Thames Basin Heaths Special Protection Area. It is therefore recognised under the EC Directive on the Conservation of Wild Birds 79/409/EEC as being an internationally important habitat for threatened species of wildlife within which Member states are **required** to conserve habitats.
- XI. Horsell Common is also designated as a Site of Special Scientific Interest and notified under Section 28 of the Wildlife and Countryside Act as being of national importance.
- XII. There are two local sites of national conservation importance located 300 metres to the north and south of the site.
- XIII. The Appropriate Assessment seems to indicate that there will be no significant increase in pollution, but the conservation objectives are to improve the habitat quality, not threaten the quality with further pressures.
- XIV. Under Pests and Predators the report states that they are “not generally an issue”. This comment is far too vague and does not give satisfactory solutions should there be a problem arising from waste. If pests and predators are dealt with by poison this could infiltrate into the local species and have a devastating effect.
- XV. Under Noise the report says, “Studies in the Netherlands and the U.S. have shown that noise from road traffic can affect birds.”
- XVI. There is no satisfactory conclusion to these studies to show that birds would not be affected. “The conservation objective that has been assigned to Thames Basin Heaths SPA is to maintain in favourable condition the habitats of the bird species of European importance”. It does not appear that this objective would be met.

Please take these considerations into account. Until English Nature is satisfied with all the reports then we, Horsell Common Preservation Society, cannot support them either.

Signed,

John Durrant
Chairman Horsell Common Preservation Society