

# Appendices

# Appendix 2

Appendix 2.1      Scoping Report and Opinion



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# Scoping Report

Proposed Waste Reception Building, Fire  
Water Tank and Pump House and relocation  
of Clinical Waste Facility

Cannon Bridge Refuse Transfer Station, East  
Taphouse, Liskeard

June 2020

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# 1 Introduction

## 1.1 Preface

1.1.1 Cornwall Energy Recovery Ltd (CERL) a subsidiary of SUEZ Recycling and Recovery UL Ltd hereby referred to as the applicant intends to apply for planning permission for a new Waste Reception (WR) building together with other associated development within the administrative area of Cornwall Council. The Proposed Development would be located within the Connon Bridge Landfill Waste Complex its location is illustrated on the Site Location Plan. A full project description is provided at Section 2 below and hereafter it is referred to as the Proposed Development.

1.1.2 The Proposed Development is of a type which does not fall within Schedule 1 of the Environmental Impact Assessment Regulations 2017 (EIA Regulations) for which undertaking and Environmental Impact Assessment (EIA) and production of an Environmental Statement (ES) is a statutory requirement. Arguably, the Proposed Development is of a type which fits within one of the descriptions of development within Schedule 2 of the EIA Regulations – Category 11(b) *‘Installations for the disposal of waste’*. Applications of a type which fall within Schedule 2 require EIA where they are likely to have significant effects on the environment. The Proposed Development is of a character and scale which would not be expected to be likely to result in significant effects on the environment and so would not normally need to be subject to the EIA process.

1.1.3 However, the proponents of the scheme have decided to voluntarily undertake an EIA and the subsequent planning application will be accompanied by an ES. The reason for preparing an ES is to address some concerns raised locally about an accumulation of developments which individually would not trigger the requirement for EIA, but cumulatively could do.

1.1.4 The Proposed Development would have an anticipated throughput of circa 6,000 tonnes per annum (tpa). When combined with the permitted throughput of the operational adjacent Waste Transfer Station (WTS), which is some 49,000 tpa, exceeds a notional throughput of 50,000 tonnes per annum. The interpretation of the indicative thresholds of Schedule 2 of the Environmental Impact Assessment Regulations 2017 is provided at <https://www.gov.uk/guidance/environmental-impact-assessment#the-indicative-thresholds>. This states that for Category 11(b) developments, the indicative threshold for:

*‘Installations (including landfill sites) for the deposit, recovery and/or disposal of household, industrial and/or commercial wastes where new capacity is created to hold more than 50,000 tonnes per year, or to hold waste on a site of 10 hectares or more. Sites taking smaller quantities of these wastes, sites seeking only to accept*

*inert wastes (demolition rubble etc.) or Civic Amenity sites, are unlikely to require Environmental Impact Assessment.'*

1.1.5 To avoid the suggestion that the proponent of the Proposed Development is in some way circumventing the EIA requirements, it has been decided that an EIA be undertaken voluntarily.

1.1.6 The purpose of this document is to request that Cornwall Council adopts a formal Scoping Opinion for the Proposed Development, under Regulation 15(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. This regulation provides that:

*'A person who is minded to make an EIA application may ask the relevant planning authority to state in writing their opinion as to the scope and level of detail of the information to be provided in the environmental statement (a "scoping opinion")'*

1.1.7 The adoption of such an opinion provides guidance to a prospective applicant on the Authority's views on what the principal impacts and effects of the development are likely to be and therefore the topics and issues on which the Environmental Impact Assessment (EIA) should focus. The Proposed Development is of a modest scale and the primary aim of this document is to ensure that the EIA and resulting ES are proportionate to the scale of the Proposed Development and allow for the scoping out of certain topics and significantly reduce levels of assessment for others.

## 1.2 Information Requirements

1.2.1 In accordance with Section 15 (2) of the EIA Regulations, when making a scoping request the developer is required to include:

- (i) *a plan sufficient to identify the land* (this is provided within the attached drawings)
- (ii) *a brief description of the nature and purpose of the development, including its location and technical capacity* (See section 2 below)
- (iii) *an explanation of the likely significant effects of the development on the environment* (see Section 4 below)
- (iv) *such other information or representations as the person making the request may wish to provide or make* (see Sections 3, 5 and 6)

## 2 The Proposal

### 2.1 The Need for the Proposed Development

2.1.1 Cornwall Council has re-procured its waste collection and cleansing contract, which is based on a new service design. The new service design will have a positive impact on the management of municipal waste in Cornwall, driving up recycling

rates and reducing the amount of residual waste that is being produced, in line with the waste hierarchy. However, it is also expected that this change will increase the use of facilities for the reception of dry recyclables and food waste in Cornwall. This increase in use is expected to manifest itself through a greater tonnage of recyclables received and processed, and through an increased number of vehicles being received at sites.

## **2.2 Alternatives**

**2.2.1** The applicant has been through the process of examining how to meet the increased demand resulting from the new service design and how to optimise the facilities to meet the proposed roll out of October 2021. The focus of this work has been the existing network of facilities which they operate, which are all within the ownership of the Council and have the space and capacity to accommodate additional infrastructure. The new waste collections service design requires amendments to the majority of the major waste facilities in Cornwall including Bodmin MRF, Pool MRF, St Erth RTS and Launceston RTS. Focusing the development of these strategic sites will ensure continuity in delivery rounds and ensures that the facilities are strategically located across the County to meet the needs of its residents and the collections rounds. Locating the proposed food waste facility at Connon Bridge will ensure the colocation of existing waste facilities in Cornwall including the RTS and HWRC at Connon Bridge, thus ensuring the continuity of vehicle movements to the site. Given the proposals at the other key waste sites in the County it is not considered that the proposals can be located elsewhere. These facilities are already used for waste management operations and there are operational advantages in increasing and expanding the use of these facilities. Additionally, the period within which new facilities would be required precludes an examination of other sites given the potential delays in procuring and permitting such sites.

**2.2.2** Within the Connon Bridge site the location of the Proposed Development has been selected because of its proximity to other infrastructure – the Waste Transfer Station, weighbridge, HWRC and Car Park. It is a location relatively close to the site entrance whilst maintaining an adequate stand-off distance from residential properties.

## **2.3 The Proposal**

**2.3.1** The Proposed Development is located within the site of the Connon Bridge Landfill Site. This site is around 1km south of East Taphouse and 5.5km south west of Liskeard.

**2.3.2** The site is located within a valley leading down to Connon Stream to the east, with the natural fall of the valley running down towards the east. The land is surrounded by agricultural fields set to pasture and enclosed by hedgerows on the northern and eastern sides and trees on the southern and western sides.

- 2.3.3** The site is bounded to the northern side by a ridge of high ground and agricultural pasture stretching between the site and East Taphouse. To the east of the site is the Current landfill site which is in the process of being restored. East of this is the 'Old Connon' landfill site, and further east still lies Connon Bridge Cottage.
- 2.3.4** The waste complex is accessed via an unclassified road from the B3359 Pelynt and Looe road which runs to the immediate west of the site and adjoins the A390 St Austell – Liskeard Road. To the west of the B3359 lie two further residential properties Hojan and Kilmansag. A public right of way runs from west to east through the application site, between the northern boundary of the landfill site and Bodithiel fields to the north and bounded on either side by outgrown hedgerows
- 2.3.5** The site as a whole occupies an area of around 67.5ha and includes the landfill sites a Household Waste Recycling Centre (HWRC), Refuse Transfer Station/Refuse Derived Fuel (RTS/RDF) facility and Offices to the west. Leachate and landfill gas management infrastructure and green electricity generation units are located within the site.

### **Planning History**

- 2.3.6** The Connon Bridge site has until recently operated under permission **PA12/06980** which was granted consent on the 17th December 2013. This 2012 application sought to increase the void space for waste at the landfill site by laterally extending the engineered landfill footprint as well as seeking to extend the timescale for landfilling and other waste management operations at the site to 31st December 2036. Planning permission PA12/06980 was granted to allow the increased landfill void space and retention of other waste management activities until 2036, but the timescale for landfilling was limited to 31st December 2018.
- 2.3.7** A further permission **PA19/01517** was granted in August 2019. This permitted changes to a number of conditions together with a surface water scheme and restoration and aftercare proposals for the site including the requirement that the landfill site be restored by 31<sup>st</sup> December 2020. It forms the current permission for the Connon Bridge site within which the Proposed Development is located.
- 2.3.8** The Refuse Transfer Station (RTS) was originally granted planning permission in May 2007 (application reference CC/CN/06/01730). This permission was amended in 2011 before the RTS was included in application reference PA12/06980 and subsequently PA19/01517. The RTS and other waste management facilities such as the Household Waste Recycling Centre (HWRC), site offices and weighbridges all have permission to December 2036.



## Description of the Proposed Development

2.3.9 The proposal comprises a number of components:

- A standalone building within which waste would be received and transferred; (WR building)
- A building to accommodate the clinical waste facility which will need to be relocated;
- A fire water tank and associated pumphouse;
- Regrading of site levels to facilitate the construction and operation of the WR facility and associated surfacing;
- A change to the annual throughput limit for the RTS.

2.3.10 The proposals are illustrated on the preliminary drawings:

- Site Location Plan: Drg. No: E05284 CNB 100
- Existing Topographical Survey: Drg. No: E05284 CNB 105
- Existing Drainage and Services Plan: Drg. No: E05284 CNB 106
- Existing Waste Transfer Station Roof Plan: Drg. No: E05284 CNB 107
- Existing Building Elevations: Drg. No: E05284 CNB 110
- Existing Site Sections: Drg. No: E05284 CNB 111
- Existing Site Wide Elevations: Drg. No: E05284 CNB 112
- Proposed Site Plan: Drg. No: E05284 CNB 200
- Proposed Surfacing Plan: Drg. No: E05284 CNB 201
- Proposed Levels Plan: Drg. No: E05284 CNB 202
- Proposed Drainage Strategy: Drg. No: E05284 CNB 203
- Proposed Impermeable Areas: Drg. No: E05284 CNB 204
- Proposed Swept Path Analysis 1: Drg. No: E05284 CNB 205
- Proposed Swept Path Analysis 2: Drg. No: E05284 CNB 206
- Proposed Swept Path Analysis 3: Drg. No: E05284 CNB 207
- Proposed Site Sections: Drg. No: E05284 CNB 210
- Proposed Cut and Fill: Drg. No: E05284 CNB 211
- Proposed Floor Plan: Drg. No: E05284 CNB 215
- Proposed Roof Plan: Drg. No: E05284 CNB 216
- Proposed Water Tank Elevations: Drg. No: E05284 CNB 220
- Proposed Building Elevations: Drg. No: E05284 CNB 221
- Proposed Site Wide Elevations: Drg. No: E05284 CNB 222

2.3.11 The application site and other land in the applicant's control is illustrated on drawings CNB TS-PLN 0420-01, 02, 03 and 04. It encompasses the areas of the new food waste facility, the relocated clinical waste facility, the areas for the fire water tank and pump house, all areas where site levels would be altered, areas of surfacing and the existing waste transfer and vehicular access. The site area is approximately 1.4 ha.

## **Waste Reception (WR) Building**

- 2.3.12** The WR building is required to manage the new food waste stream which results from the new service design. It is anticipated that it would receive and transfer in the region of 6,000 tonnes of food waste each year. Food waste would be delivered by collection vehicles, from collection week 2 of Cornwall Council's new waste collections contract and deposited within the waste bays where it would be bulked up and transferred into HGV's for onward transportation.
- 2.3.13** The proposed new building would be located to the north west of the RTS separated from it by 6 metres. The new building would match the existing RTS building in terms of height and appearance although would be much smaller in footprint – 23metres x 34metres. The new building would be fitted with fast acting shutter doors that would be vehicle activated such that the doors would be closed at all times apart from when a vehicle approaches or when a vehicle exits. No vehicle would be unloaded / or loaded without the doors having been shut. Vehicular access into the building would be through the doors on its northern elevation.
- 2.3.14** Operating hours for this facility would be the same as for the existing Refuse Transfer Station which are:
- 0700 and 1700 hours Mondays to Fridays  
0700 and 1300 hours on Saturdays  
No working on Sundays, Christmas Day or Boxing Day

It is not proposed to amend the operating hours of the RTS.

## **Clinical Waste Facility**

- 2.3.15** The proposed location for the new waste transfer building is partially occupied by the existing clinical waste facility. This facility would be located to a small building adjoining the WR building on its western elevation. The footprint of this building would be 6.3 metres x 7 metres. This building would include a covered area for vehicle unloading. Other than its revised location the operation of this facility would remain unchanged.

## **Fire Water Tank and Pumphouse**

- 2.3.16** These facilities are needed to meet the requirements of the Environment Agency's Fire Prevention Plan. The water tank and its associated would be located to the west of the RTS and would require a new access spur road and turning head from the existing landfill site peripheral site road. The exact dimension of the tank and pumphouse have yet to be finalised.

## Site Level Changes

- 2.3.17** The proposed site of the FWR building and relocated clinical waste facility slopes down from south west (c. 163 metres AOD) to north east (c.158 m. AOD). The existing site levels are illustrated on the drawing – Existing Topographical Survey: Drg. No: E05284 CNB 105. To facilitate the operation of the building some adjustment will be required to existing site levels to create a level area for the buildings and for vehicles maneuvering into and out of the buildings. The proposed change in levels is illustrated on drawing – Proposed Levels Plan: Drg. No: E05284 CNB 202. In essence, this creates a 1:2 slope / bank on the western side of the site to provide a level area for the buildings and a 1:60 sloped area to the north for vehicles maneuvering. The proposed finished floor level (FFL) for the FWR building is 157.9 mAOD and 158.2 for the clinical waste facility. At its greatest, the FFL for the FWR building would be some 4.4 metres lower than existing ground levels.
- 2.3.18** Drawing Drg. No: E05284 CNB 211 illustrates the areas which would be the subject of excavation and fill. Overall, the materials balance identifies a surplus volume of material of just over 5,000 cubic metres. It is intended to utilise this material as part of the restoration of the Connon Landfill. This is, however, contingent upon the material being of a suitable type and whether the timing of the excavation aligns with phasing of the landfill restoration works.

## Change to the Annual Throughput Tonnage Limit for the RTS

- 2.3.19** Planning Permission PA19/01517 includes condition which limits the annual throughput of the RTS by tonnage. Condition 5 of PA19/01517 states:
- 'The approved RDF processing facility shall only be utilised for the receipt and processing of residual municipal solid /commercial/industrial wastes including waste wood, arising from Cornwall's waste collection routes and / or Household Waste Recycling Centres (HWRCs) with a maximum throughput of 49,000 tonnes in any 12 month period.'*
- 2.3.20** Although the condition refers to the RDF processing facility, this is the RDF/RTS facility. The current use of the facility is just under the permitted amount – at around 45,000 tonne per annum. In order to fulfil the new Service Design throughput of greater than 49,000 tonnes per annum will be required. It is proposed that this limitation be removed.
- 2.3.21** The current level of use at the WTS results in approximately 98 vehicle movements (49 in and 49 out). The combined increase in use of the WTS and the vehicle associated with the new WR facility would increase vehicle numbers to an anticipated 204 movements daily – (102 in and 102 out). There is no restriction on vehicle numbers within the existing planning permission.

## 3 Approach to Environmental Impact Assessment (EIA)

### 3.1 Statutory Background

3.1.1 The EIA process involves identifying, predicting, evaluating, and mitigating where possible any significant effects on the environment arising from a proposed development. The key output of that part of the EIA carried out by the applicant is the Environmental Statement (ES). The ES reports the findings of the EIA and identifies any predicted significant environmental effects of the proposal. These findings inform decision makers and enable them to carefully consider the environmental effects of proposed developments when determining planning applications.

3.1.2 For the Proposed Development, the EIA and the production of its subsequent ES will be undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017 (EIA Regulations).

3.1.3 Regulation 4 (2) of the EIA Regulations requires that:

*'The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors—*

- (a) population and human health;*
- (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC;*
- (c) land, soil, water, air, and climate;*
- (d) material assets, cultural heritage, and the landscape;*
- (e) the interaction between the factors referred to in sub-paragraphs (a) to (d).*

3.1.4 Regulation 4(4) requires that

*'The significant effects to be identified, described and assessed under paragraph (2) include the expected significant effects arising from the vulnerability of the proposed development to major accidents or disasters that are relevant to that development.'*

3.1.5 Regulation 18 (3) sets out what an Environmental Statement needs to contain:

- (a) A description of the proposed development comprising information on the site, design, size, and other relevant features of the development;*
- (b) a description of the likely significant effects of the proposed development on the environment;*

- (c) a description of any features of the proposed development, or measures envisaged in order to avoid, prevent, or reduce and, if possible, offset likely significant adverse effects on the environment;
- (d) a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;
- (e) a non-technical summary of the information referred to in sub-paragraphs (a) to (d); and
- (f) any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.

3.1.6 Regulation 18(4) requires that an ES be based upon any scoping opinion, or the most recent of these if more than one scoping opinion has been adopted. It also indicates that an ES must:

*'include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment'*

## 3.2 Proportionality

3.2.1 A key objective of EIA is ensuring that the process and the resulting ES are proportionate to the scale of the development and its impacts. The Institute of Environmental Management and Assessment (IEMA) is leading the drive for proportionate EIA in the UK. In 2017 IEMA produced 'Delivering Proportionate EIA' <https://www.iema.net/policy/ia/proportionate-eia-guidance-2017.pdf>. It recognised that

*'... the drive for improved quality in EIA, combined with the UK's evidence-based and precautionary approach, has led to substantial challenges for the future of practice. The ... impact of the above good intentions has often led to individual EIAs being too broadly scoped and their related Environmental Statement (ES) to be overly long and cumbersome.*

*The result is that an increasing number of voices now recognise that EIA's influence on both project design and consenting is being diminished, as the highly useful information gathered through the assessment is often hard to locate in a mass of data and paperwork'*

3.2.2 In this case the proposed new WR facility would be located on a site which hosts several other waste management facilities including a large landfill which is in the process of being restored. The building is of modest dimensions and the anticipated throughput limited. The increased throughput at the RTS which also forms part of this proposal would lead to an increase in vehicle visits to the Connon Bridge Site. There is no current restriction on the number of vehicles visiting the WTS. This

proposal is not of a scale and character which would normally require EIA. An EIA is being volunteered by the proponents of the scheme. One of the key aims of this Scoping Report is to focus the EIA on key potential impacts and wherever possible 'scope out' assessments on topics for which there is no likelihood of significant effects on the environment. The overall aim being to provide the Local Planning Authority with the *'...information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment.'*

## 4 Scope of the EIA

### 4.1 Planning Policy

4.1.1 The EIA will identify relevant planning policies and provide a synopsis of their key provisions and tests. Planning policies can assist in determining the significance of impacts and this is the reason for their inclusion within the ES.

4.1.2 During the preparation of the Environmental Statement, the status of the emerging planning policy documents will be monitored, and the provisions of the statutory development plan updated as necessary.

4.1.3 The assessment of the extent to which the proposal accords with the provisions of national and local policy, emerging policy, will be contained within a separate Planning Statement and will not form part of the ES.

### 4.2 Environmental Topics Scoped Out

4.2.1 An initial screen of environmental topics was undertaken to determine which could lead to likely significant impacts on the environment and so would warrant being subject to EIA and those which would not.

4.2.2 Those topics 'scoped out' have been identified as:

- Emissions to Air;
- Landscape and Visual Impact;
- Cultural Heritage;
- Ecology;
- Flood Risk Assessment and Site Drainage; and
- Other topics referred to in the pre-application advice.

4.2.3 For those topics 'scoped out' it is proposed to include suitable information to accompany the planning application, recognising that these remain material considerations for the purposes of determining the application for planning permission.



## Emissions to Air

- 4.2.4 The purpose of EIA is to identify likely impacts on the environment that would result from the proposed development. Potential emissions associated with the construction and operation of the Proposed Development identified in the pre-application advice is dust particularly during the construction phase and odour during the facility's operation. Food waste is already accepted at the RTS as it forms a component of the 'black bag' waste stream.
- 4.2.5 It is the prospective applicant's contention that these sources of emissions can be adequately controlled to the extent that they would not result in significant effects on the environment. The site is also the subject of an Environmental Permit, the provisions of which already require the application of controls to prevent dust and odour emissions.
- 4.2.6 A dust management plan would be implemented which would employ the following methods to minimised dust:
- Any vehicles carrying loose or potentially dusty materials to or from site shall be fully sheeted;
  - Personnel on site will be briefed to ensure that they recognise the importance of dust minimisation. Specific personnel should ensure that dust generation is effectively controlled.
  - Minimising mobile plant and vehicle emissions through careful management (e.g. engines not to be left running)
  - Provision of training for relevant personnel on controlling dust emissions
  - Site traffic should be controlled appropriately, and access routes set up
  - Excavation and construction works should not commence until the dust suppression measures have been put in place
- 4.2.7 Perhaps of greater concern locally would be the potential for odour from the site. The nature of the waste delivered is such that odours from incoming wastes are unlikely to migrate from the site. All incoming food waste would be stored inside the building. Putrescible wastes accepted on site will be removed from site within 48 hours, or 72 hours over a bank holiday weekend. Any particularly odorous materials delivered to the site will be rejected. Should the situation occur where a load does contain particularly odorous waste, this will be immediately placed in a quarantined area and removed by the end of the working day.
- 4.2.8 Routine olfactory monitoring will be undertaken daily by an appointed person to detect any odours that may be migrating beyond the site boundary. Monitoring will be undertaken by site operatives during waste handling operations. However, the site management do not solely rely on odour checks and odour is continually assessed by all staff present on site and any odours identified outside the regular inspections are reported to site management for investigations.

4.2.9 Should an odour be detected at the boundary during routine assessments then an odour inspection shall be undertaken at key sensitive receptors and recorded on the external odour assessment survey which will clearly indicate whether or not odour was detected.

4.2.10 The Site Manager will be informed immediately of any findings of odour attributed to the site and will authorise remedial measures to be taken. Remedial actions may include but be not limited to:

- Checking storage area to identify the source of the odour to a particular waste.
- Removal of the odorous waste at the earliest opportunity and within 24 hours.
- Cleaning of storage area.
- Use of an odour suppression system for the dispersal of odour-neutralising or masking agents.

In addition, the site will be subject to a good housekeeping regime which assists with the aim of proactive management and associated environmental compliance.

4.2.11 Regular cleaning will be undertaken in the waste storage areas, including floors and bays to ensure the removal of any residues or debris and reduce the potential for odour.

4.2.12 In addition to operating a first in and first out policy the putrescible waste storage areas will be regularly emptied to allow it to be cleaned thoroughly.

4.2.13 Air quality including dust emissions can be adequately controlled through the application of the control measure set out above, and are, in any event, already required to operate effectively by the sites Environmental Permit. With appropriate safeguards to secure the implementation of these control measures such as a suitable condition(s) attaching to any planning permission it is not considered that the proposed development would lead to significant dust and air quality impacts and so do not require inclusion within the EIA.

4.2.14 The Proposed Development is not within an Air Quality Management Area. The Council's validation checklist for Air Quality Assessment requires assessments for the following types of development:

- Major: Dwellings;
- Major: Heavy Ind/Storage/Warehousing;
- Any development in excess 10,000m<sup>2</sup> new floor space (usually large scale major: offices, industry, and retail/distribution);
- Where >300 new car parking spaces are proposed (e.g. retail, visitor attraction, multi-story car park), excluding residential development car parking space provision;
- A standby emergency generator associated with a centralised energy centre (if likely to be tested/used >18 hours a year), or new Short Term Operating Reserve facilities (STOR);



- Any combustion plant with single or combined thermal input >1MW

The Proposed Development does not fall into any of these categories and so it is concluded that the application for planning permission will not require an Air Quality Assessment. Air Quality mitigation will be addressed within the planning statement.

## **Landscape and Visual Impact**

### **Existing site context and visibility**

- 4.2.1 The landscape surrounding the existing Connon Bridge RTS and landfill site is well wooded and undulating in nature. As a result, visibility of the existing RTS building and infrastructure is limited. This is recognised within the pre-application advice received from Cornwall Council, Ref – PA19/03079/PREAPP dated 10<sup>th</sup> March 2020, which states:

*‘The current RTS building although a large building – (approx. 60m x 30m) is not prominent in the wider landscape with views from the west being effectively screened by the wide tree belt separating the Connon Bridge site from the B3359 road that links East Taphouse to Looe via Pelynt. Views from the south – (i.e. from the U6158 that runs east from the B3359 towards Connon Bridge Cottage), are again generally screened by mature vegetation.’*

- 4.2.2 The pre-application advice acknowledges that views of the site can be gained from the public areas of the Connon Bridge site and that longer distance views can be gained from properties to the south and south east but all these views are seen in the context of the operational waste handling site. The pre-application advice refers to the requirement to provide a permissive footpath as part of the restoration of the landfill site. It was suggested that this, and in particular the point along it at which information panels would be provided would allow for direct views view of the proposed new building and potentially the new Clinical Waste Bay and Fire Control facilities.
- 4.2.3 The applicant’s own initial assessment of the landscape and visual impacts are set out below.
- 4.2.4 Mature woodland along the western boundary with the B3359 and southern boundary with the U6158, restrict visibility from the wider South East Cornwall Plateau landscape (CA22). Some visibility of the existing site is possible from more distant parts of CA22 and B3359 to the south, however the existing RTS building is not prominent in views and generally visible in the in the context of the existing landfill site.
- 4.2.5 Visibility is also limited from the north and east by the surrounding undulating landform profile and incised river valley landscape. The former tip area currently under restoration largely screens the existing RTS building from the east and views

from the closest Footpath (633/4/1) to the immediate north of the site are restricted by established vegetation.

## **Potential Landscape and Visual Effects**

### **Existing Landscape and Visual Receptors**

- 4.2.6 The proposed WR Building would be located to the immediate north of the existing RTS building within an existing area of disturbed ground. The proposed building would be a similar height to the existing and with a limited footprint. The proposed new building would be visually in keeping with the existing built form on site through the use of construction and finishing material to match the exiting WTS. Visibility of this new building would, like the existing WTS building, be limited. As a result there would be little noticeable change to the character of the landscape. Views from the wider landscape would be limited and the change would be barely distinguishable from existing, baseline views. The composition and character of views surrounding the site would likely be substantially unaltered.

### **Future Baseline**

- 4.2.7 Upon restoration of the landfill site a permissive path would be created and users would obtain views towards the RTS buildings and infrastructure. The proposed WR Building would be constructed ahead of the permissive path being opened and would form part of the baseline view, adjacent to the existing building. The proposed building would be in keeping with the existing RTS on site would only slightly extend the presence of built form within the view. This would be a small scale of change and effects are unlikely to be significant. The graphic reference LVIA Graphic 1 includes a photograph of the view from the viewpoint at the proposed location of the Information Panels. The elevational drawings illustrated on that graphic illustrates the scale of the new building and the context within which it would be viewed. It informs and supports the visual assessment which finds that it would represent a very limited extension of built form and be viewed in an area comprising existing landfill infrastructure and other waste facilities.

## **Conclusion**

- 4.2.8 The proposal would likely have limited effects on landscape and visual receptors given the existing site context. Effects are unlikely to be significant and it is considered a Landscape and Visual Impact Assessment is not required in this instance and will be addressed within the planning statement

## **Cultural Heritage**

- 4.2.9 Heritage assets can be affected by development through direct or indirect impacts. Direct impacts result from operations leading to the removal of archaeological remains or work which affects the fabric of an asset such as a listed building. Indirect impacts result from changes to the setting of assets which affect how they are viewed, experienced, and interpreted.

- 4.2.10 The proposed development forms a small part of a much larger waste complex and comprises land which has already been the subject of some disturbance. The limited footprint of the proposed development is, consequently, highly unlikely to directly affect any archaeological remains. The application site contains no known heritage assets and so it is concluded that there is no potential for any direct cultural heritage impacts.
- 4.2.11 In terms of indirect impacts, Figure 1 attached within the Graphics Section of this report illustrates the spatial relationship between the application site and identified heritage assets.
- 4.2.12 The nearest heritage asset to the proposed development is a bowl barrow approximately 250 metres to the west of the site. Historic England records indicate that this is a funerary monument dating from the Late Neolithic period to the Late Bronze Age. The monument includes a bowl barrow, situated at the summit of a ridge forming the watershed between the valleys of a tributary to the River Fowey and a tributary to the West Looe River. The barrow survives as a circular mound measuring up to 25m in diameter and 3.2m high. The surrounding quarry ditch, from which material to construct the mound was derived, is preserved as a buried feature. The bowl barrow is screened from the site by the existing mature vegetation on the borders of the landfill and as a result no effects are anticipated on the designation as a result of the Proposed Development.
- 4.2.13 The edge of Boconnoc Registered Park (grade II\*) is just over 600 metres south west from the Proposed Development. Historic England records indicate that it comprises around 10ha of gardens and pleasure grounds and around 340ha of parkland, ornamental plantations, and picturesque walks and rides. From its nearest point the park extends westward away from the site. As set out above due to the dense screening around the Proposed Development it is not anticipated that any significant effects will occur upon this designation as a result of the proposals.
- 4.2.14 To the north of the site lies the Historic Battlefield which was the site of the Battle of Braddock Down in 1643. The nearest point of the battlefield is 550m from the Proposed Development and extends northwards from it. The topography of the land between the battlefield edge and the site of the Proposed Development effectively prevents any views and it is on this basis that it is concluded that no significant effects would result.
- 4.2.15 The nearest listed building is the Grade II Penventon House a farmhouse, circa C18 with mid C19 alterations and additions. The associated well house a few metres to the south is also grade II listed. These structures are over 1 kilometre to the west of Proposed Development site and therefore it is not considered that any significant effects will occur.
- 4.2.16 The potential for indirect impacts is wholly dependent upon intervisibility between the heritage asset and the proposed development. The landscape and visual assessment above recognises that the Proposed Development is visually contained

through a combination of landform and mature tree belts which surround the waste complex. Additionally, any views gained of the Proposed Development from publicly accessible areas of the Connon Bridge site are done so in the context of the other waste facilities at Connon Bridge.

- 4.2.17 The NPPF (2019) recognises the importance of the conservation of heritage assets and at paragraph 189 indicates that for developments affecting heritage assets:

*'Local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'*

- 4.2.18 The National Planning Policy for Waste at its Appendix B provides a list of locational criteria for waste management facilities. Criterion e) refers to conserving the historic environment and states:

*'Considerations will include the potential effects on the significance of heritage assets, whether designated or not, including any contribution made by their setting.'*

- 4.2.19 In this instance the Proposed Development would have no direct impacts and negligible indirect impacts on any of the Heritage Assets identified above. This accords with the Council's own view as expressed within the pre-application advice which found: *'In view of the nature and location of the proposed development it is unlikely that the proposed development would cause undue adverse impacts.'* On this basis it is concluded that the ES need not contain a chapter dedicated to Cultural Heritage impacts and will be addressed within the planning statement

## Ecology

- 4.2.20 The pre application advice recognised that that the *'areas for proposed for the new development all lie within areas of land that has been developed to a greater or lesser degree which forms part of the wider infrastructure of the existing WTS. If there is to be any vegetation removal then the application should be supported by a Phase 1 Habitat Assessment.... As with any application, new development also affords the opportunity for enhancement of biodiversity, so you should set out measures seeking to achieve this.'*
- 4.2.21 A Preliminary Ecological Assessment (PEA) has been undertaken by South West Ecology. A draft report of that PEA is attached at Appendix 1. The findings of the PEA are summarised below.
- 4.2.22 The site is within the Impact Risk Zone for Boconnoc SSSI, the proposal would not impact on the integrity of the habitats and species associated with the conservation site.

- 4.2.23 The trees within the site are immature and are likely to have been planted in the last ten to fifteen years. The ground-flora was dominated by bracken and brambles with little diversity. There is not any established shrub layer. The trees within the site do not represent Priority Habitat. Plantation woodland is commonplace throughout England and is of low ecological value. The grassland is typical of amenity lawns and is of negligible ecological value. The vegetation associated with the bare ground consists of commonplace plant species typical of disturbed ground. This type of habitat is ubiquitous throughout England where land disturbance as a result of industrial works and development have taken place. The bare ground habitat is of negligible ecological value.
- 4.2.24 The site is classified as having low suitability for bats. It is considered unlikely that any habitat has been colonised by hazel dormouse. The proposed removal of the trees could potentially injure or kill hedgehogs and mitigation will be required. It is also suggested that a precautionary approach be adopted in respect of reptiles when clearing the longer grass habitat. There is nesting potential within the tree area and so mitigation measures for nesting birds will need to be employed during vegetation clearance of this area.
- 4.2.25 The PEA concludes with mitigation measures comprising:
- Any trenches (e.g. utility trenches or trenches for foundations) left exposed overnight will be provided with a means of escape for wildlife;
  - No vegetation clearance of the tree area, which could affect nesting birds, will take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a check for active birds' nests.
  - The area of longer grass should be cut in three stages using hand tools during the reptile active season (April to early October) to displace any reptiles present into the adjacent habitat to the north.
- 4.2.26 The assessment also proposes a contribution to local biodiversity including the creation of a mosaic habitat of grassland, dry heath and bare ground with occasional trees and shrubs planted to provide structural diversity. It was recommended that 2 bat boxes 2 sparrow terrace boxes are erected and a hibernaculum created to encourage reptiles and amphibians. The impacts on ecology have been assessed and with the mitigation proposed would be negligible/ positive in terms of biodiversity gain. On this basis it is concluded that the ES need not contain a chapter dedicated to Ecology impacts.

## Flood Risk and Drainage Strategy

- 4.2.27 The pre-application advice identifies the site as falling within Flood Zone 1 – an area with a low probability of flooding. It concludes that *'it would not be anticipated that the proposed development will adversely impact the flood risk.'* However, the site area exceeds 1 hectare and the NPPF advises, at footnote 50, that a site specific flood risk assessment is required for proposals in flood risk zone 1 involving sites of



1 hectare or more. A site specific flood risk assessment (FRA) has been prepared and is attached at Appendix 2. The FRA concludes that:

*'The Flood Risk Assessment demonstrates that flood risk on site can be managed without risks to the proposed development or increasing flood risk elsewhere within the catchment and is appropriate for the proposed development. The proposed surface water drainage strategy will also ensure the development is not at risk of surface water flooding and does not increase flood risk elsewhere.'*

The FRA will accompany the application for planning permission.

**4.2.28** A drainage strategy will also form part of the application for planning permission and set out how the drainage of the new facilities would integrate with the existing drainage systems at the site. Drawing: Proposed Drainage Strategy: Drg. No: E05284 CNB 203, illustrates the anticipated flows and the drainage systems to be installed to manage these flows. As part of the landfill regeneration scheme, and a wider surface water management scheme has been designed and implemented. This network will provide attenuation and storage for the proposed development.

**4.2.29** Given the findings of the FRA and provision of drainage system it is concluded that flood risk is not an issue likely to lead to significant environmental impacts and so would not be subject to EIA.

## Other topics referred to in the pre-application advice

### Lighting

**4.2.30** The pre-application advice received indicates that the parts of the site are likely to be being visible from certain dwellings and public viewpoints and requires that any lighting at the site is suitably positioned. The Proposed Development will require some limited external lighting in order to operate safely in the winter months. Given the operating hours, for much of the year, no external lighting will be required. The planning application will include drawings illustrating the location and design of all external lighting. It is also recognised that a condition can be attached to any planning permission to effectively control the impact of external lighting. For these reasons it is concluded that the impacts of lighting are unlikely to lead to any significant environmental impacts and so do not need to be included within any environmental impact assessment.

### Vermin/Pest Control

**4.2.31** The pre-application advice referred to the potential for pests to be attracted to food waste. The RTS already accepts food waste as part of the waste stream it currently receives and so pest control measures are already employed at the site. For the proposed new WR building the operation of the site with a rapid throughput of wastes involving the continual use of mobile plant and automatic door closures will serve to minimise the potential for any additional pests. In any event, the control

of pests at this Proposed Development along with the wider waste complex is subject to control under the waste permit issued by the Environment Agency. The council will be aware of the provisions of paragraph 183 of the NPPF (2019) which states:

*'The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.'*

4.2.32 Given the nature of operations and the controls exercised by the Environment Agency it is concluded that the proposed development would not result in the attraction of pests in such numbers as to represent a significant effect on the environment and so need not be included within any environmental impact assessment.

4.2.33 There are no other issues identified within the pre-application process which are proposed to be 'scoped out'.

## 4.3 Environmental Topics to be subject to EIA

4.3.1 The following issues have been identified as those which warrant inclusion within the EIA:

- Traffic;
- Noise; and
- Ground Conditions

4.3.2 The assessments under these topic headings will provide the description of likely significant effects of the development as set out in Schedule 4 at section 5 of the EIA regulations to the extent that they are relevant to the specific characteristics of the proposed development. The guiding principle will be the provision of –

*'...the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment...'* (EIA Regulations – Regulation 18 (4)(b)).

It is considered that given the scale and type of the Proposed Development that it is unnecessary to provide information on risks to human health, any assessment of impacts resulting from accidents and disasters, and the impact of the project on climate (i.e. greenhouse gas emissions).

## Traffic

### Introduction

- 4.3.3 The impact will be undertaken in accordance with the Institute of Environmental Assessment (IEA, now IEMA) guidance document 'Guidance Note Number 1: Guidelines on the Environmental Assessment of Road Traffic' (IEMA, 1993, hereafter referred to as 'the IEMA guidelines').

### Study Area

- 4.3.4 The initial study area has been determined from the access routes to and from the site and thus the sections of road along which development generated vehicles would occur. These are;
- Unnamed Access Road
  - B3359
  - A390
  - A38
- 4.3.5 The above IEMA guidelines sets out a methodology at paragraph 3.15 to determine the study area for assessment and sets out two 'rules' to determine this. This involves a screening process by assessing the impact of a proposal against baseline traffic flows to then identify the study area. At this stage, an initial study area has been identified using the access routes defined above.
- 4.3.6 The IEMA Guidelines recommend two rules as a screening process to delimit the scale and extent of the assessment:
- Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
  - Rule 2: Include any other specifically sensitive areas where total traffic flows have increased by 10% or more.
- 4.3.7 The above guidance is based upon knowledge and experience of environmental effects of traffic. The 30% threshold is based upon research and experience of the environmental effects of traffic, with less than a 30% increase generally resulting in imperceptible changes in the environmental effects of traffic. At a simple level, the guidance considers that projected changes in total traffic flow of less than 10% creates no discernible environmental effect, hence the second threshold as set out in Rule 2.
- 4.3.8 In cases where the thresholds are exceeded, Column 3 in Table 2.1 of the IEMA guidelines set out a list of environmental effects which should be assessed for their magnitude of change. It is acknowledged at paragraph 2.4 of the IEMA guidelines



that not all the effects listed in Column 3 of Table 2.1 would be applicable to every development. A detailed inspection of the surrounding road network incorporating the current geometric layout of the road, traffic management and regulation orders and general observations of existing road user movements will be undertaken to assist with the assessments.

### Consideration of Receptors

4.3.9 Paragraph 2.5 of the IEMA Guidelines explains that locations which may be sensitive to changes in traffic conditions could be:

- People at home;
- People in workplaces;
- Sensitive groups such as children, the elderly or the disabled;
- Sensitive locations such as hospitals, churches, schools, or historical buildings;
- People walking or cycling;
- Open spaces;
- Recreational sites;
- Shopping areas;
- Sites of ecological/nature conservation value; and
- Sites of tourist/visitor attraction.

4.3.10 As a general guide, the determination of receptor sensitivity is based on the criteria of value, adaptability, and tolerance. In terms of transport, receptors include people that are living in and using facilities, and using transport networks, in the area. On this basis it is likely that the conurbations along the route of the A390 will contain receptors which require assessment against the thresholds of significance.

## Noise

### Introduction

4.3.11 The noise chapter of the ES will present an assessment of the potential noise impacts of the proposal on neighbouring noise sensitive receptors during construction and operational phases of the Proposed Development.

4.3.12 Liaison with Cornwall Council has recently been undertaken in March 2020 through pre-application advice, which has provided some clarification on the noise impacts to be assessed and noise criteria to be included in the assessment.

### Baseline

4.3.13 The current restrictions in place due to the coronavirus may prevent any noise monitoring from being carried out specifically for the Proposed Development. If this is the case, the noise assessment will use noise monitoring carried out previously and baseline noise monitoring will be carried out as soon as the current coronavirus restrictions permit.

**4.3.14** An environmental baseline sound survey was carried out in the vicinity of nearest sensitive receptor (NSR) boundaries to the development site in May 2017 by RPS for the assessment of shredding activities at the RTS facility. This was undertaken to determine typical details of the existing sound climate at two of the nearest sensitive receptors to the RTS facility. This provides data such that any impact on existing residential properties adjacent to the site can be assessed. It is proposed that if baseline monitoring is unable to be carried out at this stage, the established baseline data in 2017 would be referenced to enable impacts to be determined at NSRs.

**4.3.15** The NSR baseline in 2017 was undertaken at two locations southwest of the RTS and Proposed Development, which was agreed as being most sensitive i.e. at Penhole Farm and West Trevellis (see Figure 1 attached).

### Potential Effects

**4.3.16** The possible (likely) environmental noise effects of the Proposed Development are as follows:

- operational noise associated with the Proposed Development;
- increase in road traffic noise;
- potential cumulative operational noise associated with existing RTS and HWRC site operations. Note: landfill restoration works would be completed in 2021 and therefore would have very limited and short-term effect on overall noise levels at NSR's and different noise limits would apply to this type of activity.

### EIA Approach and Methodology

**4.3.17** The noise and assessment would include the following:

- Identification of noise sensitive properties;
- Liaison with CC on whether agreement can be made in respect of the assessment baseline levels at NSRs using historical data (if current restrictions prevent monitoring of baseline from being carried out);
- Assessment of construction noise impacts in accordance with BS5228-1:2009+A1: 2014 'Noise and Vibration Control on Construction and Open Sites';
- An assessment of operational noise in accordance with BS4142: 2014+A1:2019 'Methods for Rating and Assessing Industrial and Commercial Sound' at NSRs;
- Prediction of the changes in road traffic noise levels resulting from the operational development, using Calculation of Road Traffic Noise (CRTN) calculation methods and DMRB impact assessment;

**4.3.18** The impact assessment will be undertaken with reference to the following standards and guidance:

- BS4142: 2014+A1:2019 'Method for Rating Industrial Noise affecting Mixed Residential and Industrial Areas';
- BS8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings;
- World Health Organisation (WHO) Guidelines for Community Noise: April 1999;
- The Institute of Environmental Management and Assessment (IEMA) 'Guidelines for Noise Impact Assessment';
- BS5228-1:2009+A1:2014 'Code of Practice for Noise and Vibration Control on Construction and Open Sites';
- Design Manual for Roads and Bridges: LA111 November 2019;
- Cornwall Council's 'Development Sound Standard' in February 2017 & 'Guidance for developers on the assessment of noise for planning applications'; and
- ISO 9613-2: 1996 Acoustics – Attenuation of Sound During Propagation Outdoors

### Noise Prediction Modelling

- 4.3.19** Information on the proposed site layout, detail of the plant to be utilised and any available information from equipment suppliers on plant noise levels would be reviewed or reference to empirical noise level data would be referred to as obtained from similar plant operating in the UK.
- 4.3.20** Following the review of the proposed site layout and data available on plant noise levels, noise prediction calculations would be undertaken of the effect of the plant in operation. This would consist of producing a noise model with using computer-based noise modelling software for the operation of the facility (likely to be CADNA), which would apply ISO9613-2 calculation methodology. This would include the cumulative effect of the operation of all RTS facilities on site. The predicted noise levels would assist in establishing the likely impact at the nearest sensitive receptor positions by applying BS4142: 2014+A1:2019.
- 4.3.21** Noise would also be assessed for the construction phase of the development. Information on noise sources likely to be used at site would be derived from the construction phase description and library data. An assessment of the highest likely noise levels would be provided based on the methodology provided within BS BS5228-1:2009+A1:2014 'Code of Practice for noise and vibration control on construction and open sites'.
- 4.3.22** The baseline levels would be assessed against the modelled noise impacts. The main noise sources on Site would be assessed in terms of their contribution to noise radiating from the Site at nearest sensitive receptors and results compared with relevant impact criteria.

- 4.3.23 Where appropriate, noise control measures will be considered to ensure that noise levels are within relevant noise criteria guidance. Recommendations for appropriate noise control would be detailed taking BAT (Best Available Techniques) into consideration.
- 4.3.24 Noise arising from road traffic will be determined from site traffic demand figures provided in the Transport Assessment and baseline measurements adjacent to NSR's. The impact from road traffic noise would be determined using the impact scale found within the Design Manual for Roads and Bridges LA111 guidance.
- 4.3.25 In summary, the noise impact assessment would include the following:
- Reference to established background sound data to establish typical baseline situation at nearest sensitive receptors;
  - identification of noise generating activities, such as: construction noise, construction traffic movements and operational noise from plant used relative to the Proposed Development;
  - calculation of predicted noise levels using a computer model;
  - assessment of the predicted noise levels from plant against the agreed noise criteria limits to derive a significant impact;
  - assessment of any cumulative impacts from permitted development in the vicinity of the site; and
  - identification of mitigation measures to address any significant impacts.

## Ground Conditions

### Introduction

- 4.3.26 This chapter will assess the risks posed to the development by the ground conditions present at the Site, and the risk posed to the ground by the development. This chapter will highlight any geotechnical or contamination risks that may warrant the inclusion of further consideration of ground conditions and soil within the Environmental Impact Assessment.
- 4.3.27 A Phase I Preliminary Risk Assessment (Desk Study) report has been undertaken for the Site (ref. E05284-CLB-00-XX-RP-GT-0001-P02). This report is based on a walkover survey (undertaken 4<sup>th</sup> March 2020) and draws on several sources, including an Envirocheck report, Ordnance Survey historic maps and publically available borehole data from the British Geological Survey (BGS). The Phase I Desk Study Report is presented at Appendix 3, with the above-mentioned sources included therein.

### *Assessment Team*

4.3.28 Clarkebond will be undertaking this assessment and the assessment team are members of the following professional institutes:

- The Geological Society of London
- The British Geotechnical Association

### **Baseline Conditions**

4.3.29 The site was agricultural greenfield up until the development of the adjacent landfill in the early 1990's. Associated with the landfill development were ancillary buildings indicated on the 2001 mapping, more recently becoming a recycling centre from 2010 until present day.

4.3.30 The site around the existing RTS building was noted to be cut into the existing slope and therefore is generally level. The natural fall of the land is towards the north west/west.

4.3.31 The geology of the site is shown on maps obtained from the British Geological Survey which indicate that the site is directly underlain by the Saltash Formation, which comprises slate and siltstone.

4.3.32 There are two surface water features within 500m of the site. These features include a river WB catchment on site for the West Looe River and 408m north is the West Looe River. Therefore, the potential risk to such receptors is deemed to be **moderate**.

4.3.33 The general geotechnical risk is considered to be **low**.

4.3.34 The general risk of significant contamination is considered to be **low**.

### **Scope and Assessment Methodology**

4.3.35 The available literature and database information relating to the Site has been reviewed and assessed in accordance with Part 2A of the Environmental Protection Act (1990). The Phase 2 investigation will be based on BS 5930:1999 + Annex 2:2010 – Code of Practice for Site Investigations. The soils and rocks encountered will be described in accordance with BS5930:1999 + Annex 2:2010 and BS EN ISO 14688-1:2002 and BS EN ISO 14689-1:2003. All laboratory analysis would be carried out by appropriately accredited (UKAS & MCERTS) and approved laboratories.

4.3.36 A generic quantitative risk assessment (GQRA) will be undertaken using the chemical analysis results for the soil samples obtained from the site. The approach to human health risk assessment adopted is consistent with the Environment Agency's Model Procedures (CLR11) and other relevant guidance (including SR3, BS10175:2001 and NPPF).

4.3.37 The laboratory soil data will be compared to relevant and applicable critical concentrations as outlined in the guidance. These criteria can be either Generic Assessment Criteria (GAC) or Site Specific Assessment Criteria (SSAC). For the purpose of this generic quantitative risk assessment, GAC will be used. The GACs been derived from

- LQM/CIEH 'Suitable 4 Use Levels' (S4ULs) where available, or
- DEFRA C4SL Health Criteria Values (March 2014),

4.3.38 The proposed development is a waste transfer station therefore a '*commercial*' end use will be assumed for the assessment.

### Potential receptors

4.3.39 The following have been identified as potential receptors i.e. may be affected by geotechnical or contamination issues arising from the Proposed Development:

- Workers during construction.
- Future site users.

### Assumptions and Limitations

4.3.40 At the time of this assessment no intrusive ground investigations have been completed. The ground conditions underlying the Site, as well as the likelihood of contamination within shallow Made Ground soils, have been assumed based on the findings of the Phase I Desk Study report.

### Likely Effects

**Table 1.1: Likely Ground Conditions and Soils Effects**

Aspect of Proposed Development Giving Rise to Potential Impact	Potential Impact
Construction	The ground conditions underlying the Site will affect the following aspects of the construction: Foundation type and configuration, SuDS drainage design, Soil treatment requirements, Contamination remediation requirements, Waste disposal criteria, Temporary works platform design.
Operation	Once constructed the ground conditions are unlikely to have a future impact on the development, assuming that a comprehensive intrusive investigation was undertaken to inform design.
Major Accidents	The proposed development does not present significant risk of major environmental accidents.

Aspect of Proposed Development Giving Rise to Potential Impact	Potential Impact
Cumulative Effects	Adjacent construction projects are unlikely to have an effect on this development.

### Potential Mitigation Measures

- 4.3.41 Mitigation measures can only be adequately defined once intrusive investigations have been completed.

## 5 Structure of the ES

- 5.1.1 It is proposed that the ES will be structured in the following way:

### Non-Technical Summary

- 5.1.2 A Non-Technical Summary (NTS) will be provided as a preface to the Environmental Statement which will summarise the key issues and findings of each technical assessment. The NTS will also be produced as stand-alone document that will include a description of the proposal with reference to the appropriate drawings and plans.

### Main Text

#### Introduction

- 5.1.3 The introductory chapter will provide a brief outline of the context and history of the scheme, including the drivers for the Proposed Development, background information on the applicant, and the structure of the ES.

#### Approach to Environmental Impact Assessment

- 5.1.4 The legislative requirement for an EIA will be outlined in this chapter. This chapter will then describe the key stages in the EIA process. The consultant team undertaking the technical assessment will also be identified together with a statement of competency in EIA preparation.

#### Alternatives and Project Description

- 5.1.5 This chapter will set out the applicants' approach to selecting the site and type of facility which comprises the Proposed Development. The Proposed development will be described in the following terms:
- The sites general location and spatial relationship with the other waste management facilities and infrastructure,



- A description of the new structures proposed including dimensions, finishing materials, drainage arrangements etc.
- A description of the operation of the new WR building, the anticipated throughput of the new facility, operating hours etc.
- A description of the proposed increased use of the refuse transfer station
- The expected change to traffic levels resulting from the components of the development.

## Planning Policy and Guidance

**5.1.6** This chapter will identify the following documents which together comprise the statutory development plan for the area within which the Proposed Development is located:

- Adopted Cornwall Local Plan Strategic Policies 2010 – 2030 (including the Saved Policies identified at Appendix 3 of the Plan);
- Adopted Cornwall Local Plan Strategic Policies 2010 – 2030 Community Network Area Sections; (Proposed Development within the Liskeard and Looe Community Network Area)
- Adopted Cornwall Local Plan Policies Map;
- Adopted Cornwall Site Allocations Development Plan Document and Proposals Map.

**5.1.7** The chapter will identify the policies of the statutory development plan which are relevant to the Proposed Development. It will also present the latest position in respect of any emerging development plan documents – presently just the Climate Change Development Plan Document. Finally, the chapter will refer to relevant national policy contained within the NPPF, National Planning Policy for Waste and PPG.

## Environmental Topics Scoped Out

**5.1.8** This chapter will identify those environmental topics which have been scoped out as follows:

- Emissions to Air;
- Landscape and Visual Impact;
- Cultural Heritage;
- Ecology;
- Flood Risk Assessment and Site Drainage; and
- Other topics referred to in the pre-application advice.

**5.1.9** The ES chapter will briefly outline the reasons why these topics have been scoped out and refer to the information on these topics which will nevertheless be submitted in support of the application for planning permission. Any independent reports which have been prepared on these topics are to be appended to the ES.



## Environmental Assessments

5.1.10 Individual ES chapters will be provided reporting the environmental assessments undertaken on the following key topics. These assessments will be undertaken in accordance with the scope set out above unless otherwise agreed:

- Traffic:
- Noise:
- Ground Conditions

5.1.11 Through examining these topic areas the ES will identify any significant direct or indirect effects of the Proposed Development on the receptors identified in the EA regulations 2017. It is expected that any cumulative impacts will be dealt with within the individual topic assessments. This will include reference to the very reason for preparing the ES which is the cumulative throughput of the WR facility combined with the increased throughput of the RTS. This chapter will identify any likelihood for the interaction of impacts – none are anticipated at this scoping stage. Similarly, no significant effects are expected as may arise from the vulnerability of the proposed development to major accidents or disasters.

## Summary and Conclusions

5.1.12 The final chapter would summarise the finding of the EIA. It will provide a schedule of the mitigation measures developed or referred to in the assessments and conclude on the significance of any remaining impacts.

## Drawings and Graphic Material

5.1.13 The ES will include drawings to assist in the description of, and to illustrate, the Proposed Development and will include any other graphic material required to accompany the environmental assessments.

## Appendices

5.1.14 The appendices will include the reports relied upon in scoping out topics together with any additional technical appendices which support the assessments.

# 6 Invitation to Comment

6.1.1 The purpose of the report is to seek the views of Cornwall Council on which issues should comprise the focus of the EIA process and the information that should be presented in the Environmental Statement. Comments and responses are invited on the following:

1. Does the Council agree with the overall approach on a narrowly focussed EIA aligned with the principles of EIA proportionality?
2. Does the Council agree with the topics to be 'scoped out' and 'scoped in'?

3. Does the Council agree with the methodologies and approaches set out to the individual topic assessments set out in section 5 above?
4. Does the Council accept that matters scoped out can nevertheless remain as material planning considerations on which information on non-significant environmental impacts remain desirable?
5. Is the Council content that information pertaining to topics scoped out but remaining as material considerations should be appended to the ES?

**B Land at Connon Bridge****30<sup>th</sup> July 2020****PA20/04625– Scoping Opinion - Proposed Waste Reception Building, Fire Water Tank and Pump House and relocation of Clinical Waste Facility Connon Bridge Refuse Transfer Station, East Taphouse, Liskeard****GENERAL COMMENT**

This Scoping Opinion (SO) is in response to the request made by Suez Recycling and Recovery UK Ltd on behalf of Cornwall Energy Recovery Ltd., (CERL) received as valid on the 5<sup>th</sup> June 2020 under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 – Regulation 15 –Scoping – for proposed Waste Reception Building, Fire Water Tank and Pump House and relocation of Clinical Waste Facility Connon Bridge Refuse Transfer Station, East Taphouse, Liskeard.

In regard to this Scoping exercise, a 'Scoping Report' was supplied dated June 2020 and prepared by Stephenson Halliday – (hereafter referred to as the 'SH Report') and in adopting this SO, Cornwall Council has had regard to this Report. The Environmental Statement (ES) produced should both take account of this SO and the issues covered in the abovementioned SH Report.

In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, set out below is a detailed (but not exhaustive) list of environmental issues that should be included in the ES. The list includes reference to general comments made by consultees whilst the more specific detailed comments (which you should take particular note of) - can be found in copies of the consultee responses appended to this SO.

The ES should contain the maximum relevant information available prior to submission of the planning application. Full regard should be given to the advice contained in Schedule 4 Parts 1 and 2 to the 2017 Regulations.

It is important that typographical errors are eliminated and the submitted document checked thoroughly as to avoid unnecessary queries of data and/or statements, which often gives rise to consultee and public concern.

Details of the scoping exercise, any consultations and public meetings, before and after the request for this SO should be provided with the ES – along with details of Community Engagement.

The issues regarded as those giving rise to the most significant impacts should be highlighted in the introduction to the Statement and summarised in a Non-Technical Summary (NTS).

The content of this SO does not prejudice any request for further information under Regulation 25 of the above Regulations if required at a later stage.

## **APPROACH TO THE ENVIRONMENTAL ASSESSMENT**

Consultation is a key aspect of all Environmental Impact Assessments. This SO lists those statutory consultees and other stakeholders who have been consulted on the SH Report and that have responded. Although some specific comments from their responses may have been incorporated into the SO, the full responses received have been included at the Appendices below and it is these full responses which should also be taken into account when preparing the ES.

The ES should report on how these consultation responses have been addressed in the EIA including any justification for the omission of any issues. The opportunity to comment upon a draft copy of the ES is requested by Cornwall Council in due course. It is expected that mitigation requirements would be described within each of the individual topic chapters of the ES and any supporting documents. This should provide for a schedule of the mitigating measures proposed and a timetable for their implementation.

## **CONTENT OF THE ENVIRONMENTAL STATEMENT**

The Environmental Statement (ES) should include the following information;

- Description of the development, including a description of the physical characteristics of the whole development;
- An outline of the main alternatives studied by the applicant (including the 'do nothing' option) and an indication of the main reasons for the choice made, taking into account the environmental effects.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, fauna, flora, heritage impacts, landscape and the inter-relationship between the above factors.
- A description of the likely significant effects of the development on the environment in respect of direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from the existence of the development.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment. This should also identify the proposals for decommissioning and restoration of the site and respective timetable.
- The data required to identify and assess the main effects which the development is likely to have on the environment.
- A Non - Technical Summary of the information provided.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

## **POTENTIAL MAIN OR SIGNIFICANT ENVIRONMENTAL EFFECTS**

### **Description of the physical characteristics of the proposed development and the land-use requirements.**

The past, present and future uses of the land upon which the proposed development would be located should be described in sufficient detail to provide the context for the proposed development. The extent of the study area required around the site will vary according to the nature of the impact and its significance. It is also important to ensure that the cumulative impacts of other developments in the area are identified.

### **Outline of the main alternatives studied by the applicant and an indication of the main reasons for the choice made, taking into account the environmental effects.**

The ES shall demonstrate that alternative options have been considered prior to proceeding with the current proposals, which should include a consideration of the 'do nothing' option.

### **Description of the aspects of the environment likely to be significantly affected by the development, including, in particular, fauna, flora, soil, heritage, landscape and the inter-relationship between the above factors.**

This is self explanatory but should be informed by the SH Report and the consultation responses below.

### **For clarification based on the information in the SH Report, – the proposed development would consist of the following elements:-**

- *a new standalone building within which waste would be received and transferred; (Waste Reception - WR building);*
- *a new building to accommodate the relocated Clinical Waste facility;*
- *a fire water tank and associated pumphouse;*
- *regrading of site levels to facilitate the construction and operation of the WR facility and associated surfacing;*
- *a change to the annual throughput limit for the existing Refuse Transfer Station - RTS.*

## **Landscape and Visual Impact**

### Summary of key issues

One of the consultees was the Council's Landscape Architect and the following summary results from their comments.

'Although the application site adjoins an area of landfill undergoing restoration, the surrounding landscape character is in tune with the findings of the Cornwall Landscape Character Assessment (CA22 South East Cornwall Plateau). The presence of Cornish hedgerows, hedgerow trees, woodland and estate land give the surrounding landscape strong landscape character and high biodiversity value. The proposed development has the potential to result in adverse landscape effects.

Any application must identify these effects and outline corresponding mitigation proposals. These mitigation proposals should inform the development layout and this should be clearly explained in the application documents.

A sensitive, sustainable and high standard of landscaping and unit layout and design is expected; although this is a waste transfer site located in an undesignated landscape the site adjoins a reasonably undisturbed landscape of high quality. Accordingly, various master planning issues are set out below.

### Further information

Reference 'Scoping Report Proposed Waste Reception Building, Fire Water Tank and Pump House and relocation of Clinical Waste Facility Connon Bridge Refuse Transfer Station, East Taphouse, Liskeard' dated June 2020 and accompanying drawings.

### 1.0 Landscape Character and Visual Amenity

A Landscape and Visual Impact Assessment should be provided in accordance with The Guidelines for Landscape and Visual Impact Assessment (GLVIA 3rd edition 2013). The character of the site and its setting should be explored and the potential impacts on the study area assessed. Cumulative effects should be considered.

The study should reference the Cornwall Landscape Character Assessment 2007.

#### Views and visibility-

*- identify major views in to and out of the site, indicate what measures are being taken to protect / retain, enhance, or mitigate those identified;*

*- provide visualisations of the views identified, as seen from eye level and clearly showing the visual impact in the wider landscape context;*

*-the Landscape and Visual Impact Assessment (LVIA) will need to particularly consider any effects on the three adjoining Areas of Great Landscape Value (AGLV) (Mid Fowey, Looe & Seaton Valleys and Boconnoc AGLV);*

*- identify any adverse impact upon Boconnoc Registered Park and garden approximately 500m distant;*

*- provide a Zone of Theoretical Visibility (ZTV) for a radius of 5km from the centre of the site, clearly indicating distance radii; the site documentation suggests that the application site is located in a bowl surrounded by higher landform, if there is no intervisibility with the wider landscape a ZTV analysis may not be necessary but this needs to be demonstrated;*

*- demonstrate the impact upon the Public Right of Way that runs through the landfill site and the surrounding highway network.*

[This should also give consideration to permissive paths- existing / proposed for the Connon Bridge site – Planning Ref PA19/01517]

## 2.0 Masterplan/Design considerations

The proposed site layout needs to demonstrate sensitive design which will not adversely impact the particular character and quality of the landscape. Consideration should therefore be given to the following issues:

2.1 Built Form - *consider the building layout, heights and massing and surface finishes in relation to the findings of the LVIA in particular visual mitigation; this should be explored by visualisations of the development proposals.*

2.2 Topography - *should be explored in detail with sections provided that demonstrates the relationship of the proposed development layout to site contours and in particular to key views.*

2.3 Trees and Hedgerows - *The existing trees on site must be seen as a valuable resource to offset some of the adverse visual impact likely to derive from the development and to provide valuable site context, landscape maturity and screening. The application must demonstrate that the design layout is fully informed by a Tree Constraints Plan developed to BS 5837:2012 'Trees in Relation to Design, Demolition and Construction' standards.*

2.4 Cornwall Council's Biodiversity Guide -*should also be referenced, particularly in relation to the sustainable retention of hedgerows which is set out in some detail in the guidance.*

2.5 New trees and hedges -*may be critical to set any development into the site: a planting strategy should be developed that clearly responds to the findings of the LVIA as well as the very particular site conditions. All planting mixes will need careful consideration and reflect the Cornish palette and planting specifications will need to reflect the often very challenging conditions in Cornwall for plant establishment.*

### Masterplan Summary Points

- *demonstrate that the height and massing of buildings and structures respond to the findings of the LVIA, proximity of any dwellings and the network of Public Rights of Way/local highway network;*
- *layout design should be determined by the findings of the Tree Survey and Tree Constraints Plan to BS5837; 2012. Drawing 'Proposed Site Layout' appears to indicate a possible conflict with existing trees;*
- *any existing hedgerows should be retained and given an appropriate margin for their long-term retention as guided by Cornwall Council's Biodiversity Guide. The existing tree cover will be important to shield any proposals;*
- *show the layout of spaces and elements necessary for an effective drainage system and in what form they take. It should be demonstrated that this drainage system has been designed in relation to the BS5837;2012 Tree Constraints Plan clearly avoiding Root Protection Areas.'*

The comments of the Council's Landscape Architect are also given in Appendix A.

In the SH Report, it is suggested that Landscape and Visual Impact matters be 'scoped out' but in view of the comments from the Council's Landscape Architect – it is recommended that such matters be 'scoped in'.

### **Local Amenity Impacts**

Any development of the type proposed has the potential for amenity impacts from e.g. concerning – noise, dust, odour, light pollution, vermin/pest control and amenity issues arising from heavy vehicles serving the site.

#### Noise

This is a topic that has been 'scoped in' – as identified in the SH Report. In terms of noise from the Cannon Bridge site as a whole, this aspect is currently controlled by the Environment Agency in the Environmental Permit for the site.

The proposed development is for a freestanding development which if consented would have its own conditional permission – akin to the Gas Engine Compounds (which have their own conditions that address noise limits etc).

It will be expected that any formal application includes a full Noise Assessment by a suitably qualified Acoustician, with background and ambient sound monitoring having been undertaken.

All relevant noise sources associated with activities undertaken at the site associated with the proposed development – including cumulative noise - will



require consideration within the assessment to determine the impact upon the closest noise sensitive receptors –through measurement, or prediction where this is not possible). This information will form the basis of determining whether any mitigation is required and, if so, the approach to any conditions imposed by the Local Planning Authority (LPA).

The Council's Environmental Protection Officer - (Air Quality and Noise) was consulted on the Scoping Opinion request and his comments are given in full in Appendix B. It is noted that currently noise is control by the Environment Agency (EA) - via the Permit and he recommends that if in due course – planning permission is granted and that the Council intend to impose planning conditions in respect of noise, then there should be liaison with the EA - otherwise there is a risk that the two regimes may implement conflicting restrictions.

It is recommended that the applicant / consultant make reference to Cornwall Council's Development Sound Standard when undertaking the noise assessment: -

[www.cornwall.gov.uk/media/25453200/noise-and-planning-developers-guidance.pdf](http://www.cornwall.gov.uk/media/25453200/noise-and-planning-developers-guidance.pdf)

Such amenity impacts could affect a variety of noise sensitive receptors ranging from dwellings to recreational areas (such as Public Footpaths) and each of the above will need to be covered in the ES.

In their response to the SH Report – the Environment Agency noted that noise pollution from the proposed Pumphouse facility during testing procedures and incident use should be a consideration.

#### Emissions to air – Dust / Odour

In the SH Report – 'emissions to air' has been 'scoped out' and it is stated that *'for such topics it is proposed to include suitable information to accompany the planning application as these remain material considerations for the purposes of determining the application for planning permission'*.

Issues of dust and odour should identified as key matters for consideration and it is concluded that 'emissions to air' should therefore be 'scoped in' and be included in the Environmental Impact Assessment – in similar way to noise and other named matters.

Dust - It is recommended that any application contains a Dust Assessment / Management Scheme to cater for the proposed development (including construction) and other associated dust sources including from the access tracks etc. The scheme should identify all potential dust sources, means of control, assessment and mitigation measures. It would be expected that a Dust Management Scheme be provided which should address all relevant activities.

Odour - In regard to odour, with the proposed new building being proposed for the reception of food wastes then there is the potential for odour generation. Accordingly, any application should be accompanied by an Odour Assessment / Management Scheme / Odour Management Plan (OMP). These documents

should identify all potential odour sources – including that from the WR building, the RTS and the Clinical Waste Bay; identify means of control, assessment and set out the full range of mitigation measures. The documents shall also include details of potential odours arising from vehicles both delivering and collecting the food and other wastes and how this can be controlled. Whilst it is recognised that food wastes would be removed from site within 48 hours, (or 72 hours over a Bank Holiday weekend) – some of the waste delivered for storage may have been disposed of by a householder up to 7 days previous and so a robust odour management system needs to be detailed.

If permission were to be granted and an OMP be required by planning condition- the provisions of such a condition should not preclude reference to any future approved revisions of any OMP document specifically referred to as it is recognised that such a Plan could evolve over time.

The Council's Environmental Protection Officer requests that construction and operational air quality impacts are assessed. Any assessment should be in line with the Institute of Air Quality Management's guidance: Land Use Planning & Development Control: Planning for Air Quality dated January 2017. The assessment would also need to consider whether the proposed scheme will impact on the Bodmin and Tideford Air Quality Management Areas.

Detailed comments regarding emissions to air are also given by the Environment Agency (full response given in Appendix G – including the need for fast acting doors, all loading / unloading of food wastes needing to take place within the WR building, with the suggestion that odour could escape from the facility doors, when opened, during loading or unloading activities so the details of operation of the facility will need to be set out in detail.

### Lighting

In view of the local topography parts of the site are likely to be being visible from certain dwellings and other public viewpoints and it is important that any lighting at the site is suitably positioned/screened such that site lighting does not cause glare / annoyance to local residents, users of the public highway network and users of recreational areas. Details of how this can be achieved shall be therefore included.

### Vermin / Pest Control

The storage of food waste on site has the potential to attract pests (including rodents, seagulls, flies) and therefore consideration should be given to the introduction/ review of a pest control service to control activity on site and details should be given as to how this aspect would be addressed.

### Impact on amenity from traffic

Apart from highway engineering / capacity aspects – (see below)- consideration will need to be given to impacts on local amenity from traffic serving the site

and an assessment on this aspect should be provided. Main traffic routes for vehicles serving the proposed new development should be identified – along with an assessment of the likely numbers / proportion of vehicles using those routes, identifying roadside properties along these routes and the frequency of these properties being passed by vehicles associated with the proposed development.

### **Contaminated Land**

This aspect has been 'scoped in' with a Phase I Preliminary Risk Assessment (Desk Study) report having been provided. This has been considered by the Council's Environmental Protection Officer notes that this has outlined potential contamination from made ground and landfill gas from the adjacent landfill and therefore requires further intrusive investigation. The full comments from the Officer are given in Appendix C.

### **Ecology**

The SH Report referred to and included a draft Preliminary Ecological Assessment (PEA) undertaken by South West Ecology and this has been considered by the Council's Ecologist who in summary had the following comments:-

*Should the development go ahead then the recommendations made in Sections 5.6 and 5.7 of the Preliminary Ecological Appraisal should be required by condition. If classified as a 'major' development - then it will be subject to the 10% biodiversity net gain and an assessment using the Defra metric along with plans of how the net gain will be achieved will be required.*

*In response to the questions posed in Section 6.1.1 of the Scoping report:*

*1 – it is agreed with approach of a narrowly focusses EIA aligned with the principles of EIA proportionality.*

*2 - overall it is agreed with the topics that been scoped out/in. It is noted that emissions to air have been scoped out of the EIA. Provided that existing mechanisms are in place and that these can cope with the increased levels of emissions then this conclusion is agreed with but queries are made as to the methods/standards in place that will be used to objectively measure odour levels.*

*3 - it is agreed with the overall approach to the EIA set out in Section 5 of the report.*

*4 - although ecology has been scoped of the main EIA assessment it should remain as a material consideration.*

*5 - information pertaining to topics scoped out but remaining as material considerations should be included as Appendices to the ES.*

Consideration will need to be made to the Habitats Regulations Assessment (HRA) Regulations as appropriate.

The comments of the Council's Ecologist are given in Appendix D below.

You should also be mindful of the detailed comments from Natural England – that are given in full in Appendix J.

### **Historic Environment / Cultural Heritage**

The SH Report refers to 'cultural heritage' as being 'scoped out' – noting that the proposed development forms a small part of a much larger waste complex and comprises land which has already been the subject of some disturbance. The limited footprint of the proposed development is, consequently, highly unlikely to directly affect any archaeological remains. The application site itself contains no known heritage assets and so it concludes that there is no potential for any direct cultural heritage impacts. Notwithstanding this, reference is made to potential for indirect impacts on recorded 'off site' assets such as a funerary monument (bowl barrow), the Boconnoc Registered Park (Grade II), the Historic Battlefield (Braddock Down) and then other Listed Buildings at distance.

The Council's Historic Environment Planning (Archaeology) – comments are given in Appendix E - notes that :-

*Although there are a number of prehistoric monuments (Bronze Age barrows) located nearby, one of which is a Scheduled Monument, and the site of a former military camp, the general lie of the land and contours away from these heritage assets, plus the previously disturbed nature of the land within this limited application area, suggests that there is nothing to be gained from an archaeological investigation should this proposal be brought forward as a planning application. Also, this site is not within an area of Anciently Enclosed Land.*

*In this instance we consider it unlikely that archaeological remains will be disturbed by groundworks.*

*RECOMMENDATION: Therefore, our scoping opinion is that no archaeological mitigation will be required and as a consequence no conditions will be sought.*

The Council's Senior Development Officer (Historic Environment Planning) – comments given in Appendix F – raises no issues.

### **Drainage / Flood risk / pollution control**

As part of the Scoping exercise – consultations were undertaken with the Environment Agency (EA) and the Council's Principal Sustainable Drainage Officer (PSDO).

The EA note that the following:-

### Advice – Groundwater Environment

The EA recognise that 'Ground Conditions' is one of the topics to be subject to EIA, as outlined in section 4.3.26 onwards – of the SH Report - however the EA consider that the further detail is required and the EIA should include the following topics:-

- *the impacts on hydrogeology and the groundwater environment;*
- *provide more information on the proposed construction methods. E.g. whether construction dewatering or piling shall be used, and what mitigation measures would be needed to protect the water environment;*
- *assessment of any impacts to surface water and groundwater abstractions. Also, the site surveys should include a door to door water features survey.*

In regard to the fire water tank and pump house, the EA note that Chapter 16 of their Fire Prevention Plan guidance document currently states:-

*- you must have enough water available for firefighting to take place and to manage a worst case scenario. Depending on the site, this could be water in storage tanks or lagoons on site, or access to hydrants or mains water supply. A worst case scenario would be your largest waste pile catching fire. A water supply of at least 2,000 litres a minute for a minimum of 3 hours will be required for a 300 cubic metre pile of combustible material.*

*The volumes of water needed may be reduced if you have a system that lets the fire and rescue service re-circulate the water they are using to fight the fire (fire water). However, this water may need to be filtered and the fire and rescue service will also need to connect to your system. It may not always be appropriate or safe to re-circulate the water.*

The above matters will need to be addressed in any application.

The comments in full - from the EA are given in Appendix G below.

The Council's Principal Sustainable Drainage Officer (PSDO) notes that the proposed site sits within Flood Zone 1 based on the Environment Agency flood mapping data. The site is outside Critical Drainage Areas notified to the LPA by the EA. Mapping indicates some areas across the site which could be susceptible to surface water and groundwater flooding.

The LLFA has reviewed the FRA provided and is satisfied with the details contained within it. Proposals with respect to the drainage of the site should therefore be in accordance the principles set out in the FRA produced by Clarkebond Reference E05284/FRA dated 20/05/2020.

The comments in full from the Council's Principal Sustainable Drainage Officer are given in Appendix H below.

## **Traffic and Highways**

The Council's Highways Development Management Officer was consulted on the SH Report and had the following comments:-

*In addition to the information submitted, any subsequent application should include a full Transport Assessment. As well as addressing the matters raised by Highways England, in respect of the Cornwall network, junction assessments should also be undertaken at the following locations;*

- 1. Junction of B3359/U6158 (this is the road from B3359 junction to site access);*
- 2. Junction of B3359/A390 at East Taphouse;*
- 3. Junction of B3359/ C0222 (this is the road running NW/SE from South of Kilmansag to A390 at Middle Taphouse);*
- 4. Junction of C0222/A390 at Middle Taphouse.*

*This should include a modelling assessment (J9/Pic), accident data, and swept path tracking (with largest vehicle deployed) to demonstrate geometry can accommodate the capacity being demonstrated. It is noted that at a number of the junctions listed, there are visual indications on the ground that wide sweeping, and/or carriageway and verge damage occurs.*

*A narrative of how vehicle movements from the various uses of/activities at this site have changed over time. There should be a clear breakdown, of what this proposal will result in, in terms of traffic impact, in the context of wider uses of/activities at the site.*

*Issues raised by Parish Councils in public consultation will also need to be addressed. This may well include Traffic Management Plans for the wider operation, to mitigate the impact. I will be assessing highway safety and capacity matters, however, management of the wider residential amenity issues will be of interest to the Planning Officer.*

*Depending on the conclusions of the junction assessments above, it may be necessary to consider mitigation works to accommodate this proposal.*

The complete response from the Council's Development Management Officer are given in Appendix I.

Further detailed comments from Highways England in Appendix K and the points made therein should also be covered.

## **Public Rights of Way (PROW)**

There are no Public Rights of Way directly affected by the footprint of the proposed new development. Public Footpath No. 4 – (St. Pinnock) – lies to the north west and north of the proposed development site. Views towards the site from this path would be likely largely screened by the hedge and associated

vegetation lying between the path and the proposed development site. However, as part of the approved restoration scheme for the Connon Bridge Landfill site under Planning Ref PA19/01517 – there are requirements for permissive paths and a wildlife viewing shelter that would have views to the proposed development site and visual / amenity impacts on these public areas will need consideration.

The comments from the Council's Countryside Access Team and the Ramblers Association (Cornwall) are given in Appendices L and M respectively.

### **Mitigation**

It is expected that mitigation requirements will be described within each of the individual topic chapters of the ES. This should provide for a schedule of the mitigating measures proposed and a timetable for their implementation.

### **Non-technical summary.**

The Environmental Statement may, of necessity, contain complex scientific data and analysis in a form which is not readily understandable by the lay person. The main findings must be set out in accessible plain English in a non-technical summary to ensure that the findings can more readily be disseminated to the general public, and that the conclusions can be easily understood by non-experts as well as decision makers.

### **An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant or appellant in compiling the required information.**

Although it is important that information provided within the ES is up to date and relevant, it is acknowledged that there may be occasions where this may not be the case. The ES should provide clear details, if this becomes the case.

### **ENVIRONMENTAL IMPACTS OR EFFECTS WITH LESSER OR NO SIGNIFICANCE**

The ES should be proportionate and not be any longer than is necessary to assess properly the effects of the main environmental impacts. Impacts which have little or no significance for the particular development in question will need only very brief treatment to indicate that their possible relevance has been considered.

The Connon Bridge site lies wholly within St. Pinnock Parish but Broadoak Parish Meeting lies to the west with Lanreath Parish lying to the south west. Comments from St. Pinnock Parish Council and Broadoak Parish Meeting are given in Appendices N and O respectively. The ES should provide details of what consultations have been carried out with the Parish Council / Meetings and detail any other consultations with other statutory consultees, interest groups and the Public.

The Local Electoral Members the site are as follows:-



- the site itself – Councillor Phil Seeva – Menheniot Electoral Division (ED); Councillor Colin Martin – Lostwithiel ED and Councillor Richard Pugh – Trelawney ED and it is advised that discussions are held with the Local Members so that they are aware of the potential forthcoming planning application.

## **SUMMARY**

This Scoping Opinion seeks to address the main issues that should be covered in any Environmental Statement accompanying a planning application for the above development. However it should be appreciated that this Scoping Opinion is based on information currently available and is not exhaustive.

Continued pre-submission discussions with the Parish Councils and Local Elected Members are recommended to ensure as much involvement of the local residents as is possible prior to the application being formally lodged.

Should you decide to change the details of your proposed development in any way then please contact the Case Officer (Tim Warne) via the contact details below to determine whether or not further scoping of the proposal is necessary.

Yours sincerely,

*Louise Wood*

Service Director Planning and Sustainable Development

Tel: 01872 224475

Email: [twarne@cornwall.gov.uk](mailto:twarne@cornwall.gov.uk)

Dated 30<sup>th</sup> July 2020.

## **List of Consultees for Scoping Opinion.**

- Cornwall Council Landscape Architect – (see comments in Appendix A)

- Cornwall Council Environmental Protection - Air Quality and Noise – (see comments in Appendix B)

- Council's Environmental Protection (Contaminated Land) – (see comments in Appendix C)

- Cornwall Council Ecologist – (see comments in Appendix D)



- Cornwall Council Historic Environment Planning (Archaeology)– (see comments in Appendix E)
- Council’s Senior Development Officer (Historic Environment Planning) – (see comments given in Appendix F)
- Environment Agency - (see comments in Appendix G)
- Council’s Principal Sustainable Drainage Officer – (see comments in Appendix H)
- Cornwall Council Highways Development Management Officer – (see comments in Appendix I)
- Natural England – (see comments in Appendix J)
- Highways England – (see comments in Appendix K)
- Cornwall Council Countryside Access Team – (see comments in Appendix L)
- Ramblers – (see comments in Appendix M)
- St Pinnock Parish Council – (see comments in Appendix N)
- Broadoak Parish Meeting – (see comments in Appendix O)
- Views from residents who made comments (see comments in Appendix P)

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### **Other consultees where no response received**

- Cornwall Wildlife Trust

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## **Appendices**

### **Appendix A – Cornwall Council Landscape Architect**

#### Summary of key issues

Request for an EIA scoping opinion for a proposed food waste reception facility (stand-alone building), a new Clinical Waste Facility Building, a Fire Water Tank and

Pumphouse, the regrading of site levels to accommodate the new structures and change to annual throughput limit for the existing Refuse Transfer Station.

Although the application site adjoins an area of landfill undergoing restoration, the surrounding landscape character is in tune with the findings of the Cornwall Landscape Character Assessment (CA22 South East Cornwall Plateau). The presence of Cornish hedgerows, hedgerow trees, woodland and estate land give the surrounding landscape strong landscape character and high biodiversity value. The proposed development has the potential to result in adverse landscape effects.

Any application must identify these effects and outline corresponding mitigation proposals. These mitigation proposals should inform the development layout and this should be clearly explained in the application documents.

A sensitive, sustainable and high standard of landscaping and unit layout and design is expected; although this is a waste transfer site located in an undesignated landscape the site adjoins a reasonably undisturbed landscape of high quality. Accordingly, various master planning issues are set out below.

#### Further information

Reference 'Scoping Report Proposed Waste Reception Building, Fire Water Tank and Pump House and relocation of Clinical Waste Facility Connon Bridge Refuse Transfer Station, East Taphouse, Liskeard' dated June 2020 and accompanying drawings.

#### 1.0 Landscape Character and Visual Amenity

A Landscape and Visual Impact Assessment should be provided in accordance with The Guidelines for Landscape and Visual Impact Assessment (GLVIA 3rd edition 2013). The character of the site and its setting should be explored and the potential impacts on the study area assessed. Cumulative effects should be considered.

The study should reference the Cornwall Landscape Character Assessment 2007.

#### Views and visibility

- identify major views in to and out of the site, indicate what measures are being taken to protect / retain, enhance, or mitigate those identified;
- provide visualisations of the views identified, as seen from eye level and clearly showing the visual impact in the wider landscape context.
  - the Landscape and Visual Impact Assessment (LVIA) will need to particularly consider any effects on the three adjoining Areas of Great Landscape Value (AGLV) (Mid Fowey, Looe & Seaton Valleys and Boconnoc AGLV);
- identify any adverse impact upon Boconnoc Registered Park and garden approximately 500m distant;
- provide a Zone of Theoretical Visibility (ZTV) for a radius of 5km from the centre of the site, clearly indicating distance radii; the site documentation suggests that the application site is located in a bowl surrounded by higher landform, if there is no

intervisibility with the wider landscape a ZTV analysis may not be necessary but this needs to be demonstrated;

- demonstrate the impact upon the Public Right of Way that runs through the landfill site and the surrounding highway network.

## 2.0 Masterplan/Design considerations

The proposed site layout needs to demonstrate sensitive design which will not adversely impact the particular character and quality of the landscape. Consideration should therefore be given to the following issues:

2.1 Built Form - consider the building layout, heights and massing and surface finishes in relation to the findings of the LVIA in particular visual mitigation; this should be explored by visualisations of the development proposals.

2.2 Topography - should be explored in detail with sections provided that demonstrates the relationship of the proposed development layout to site contours and in particular to key views.

2.3 Trees and Hedgerows - The existing trees on site must be seen as a valuable resource to offset some of the adverse visual impact likely to derive from the development and to provide valuable site context, landscape maturity and screening. The application must demonstrate that the design layout is fully informed by a Tree Constraints Plan developed to BS 5837:2012 'Trees in Relation to Design, Demolition and Construction' standards.

2.4 Cornwall Council's Biodiversity Guide -should also be referenced, particularly in relation to the sustainable retention of hedgerows which is set out in some detail in the guidance.

2.5 New trees and hedges -may be critical to set any development into the site: a planting strategy should be developed that clearly responds to the findings of the LVIA as well as the very particular site conditions. All planting mixes will need careful consideration and reflect the Cornish palette and planting specifications will need to reflect the often very challenging conditions in Cornwall for plant establishment.

## Masterplan Summary Points

- demonstrate that the height and massing of buildings and structures respond to the findings of the LVIA, proximity of any dwellings and the network of Public Rights of Way/local highway network.

- layout design should be determined by the findings of the Tree Survey and Tree Constraints Plan to BS5837; 2012. Drawing 'Proposed Site Layout' appears to indicate a possible conflict with existing trees;

- any existing hedgerows should be retained and given an appropriate margin for their long-term retention as guided by Cornwall Council's Biodiversity Guide. The existing tree cover will be important to shield any proposals;

- show the layout of spaces and elements necessary for an effective drainage system and in what form they take. It should be demonstrated that this drainage system has

been designed in relation to the BS5837;2012 Tree Constraints Plan clearly avoiding Root Protection Areas.

## **Appendix B - Council's Environmental Protection (Air Quality and Noise)**

I have discussed this application with the Connon Bridge Permitting Officer in the Environment Agency. They have confirmed that the processes proposed to be undertaken in this application will require a Permit and an update to Connon Bridge's Environment Management Statement. I was informed that they shall be putting through a consultee comment with a request for specific information addressing their information requirements with regard to noise, odour and dust. In this circumstance, it has been agreed with the Environment Agency that the appropriate course of action is to allow the EA to request the information they consider necessary, as the process proposed falls within their remit. Comments made by myself on behalf of Community Protection for these matters is likely to result in confusion/duplication. I would recommend that if you are intending on implementing a condition on the planning consent that you liaise with the Environment Agency in order that the condition accords with the permit, otherwise there is a risk that the two regimes will implement conflicting restrictions.

Further comment - Environmental Protection request that construction and operational air quality impacts are assessed. Any assessment should be in line with the Institute of Air Quality Management's guidance: Land Use Planning & Development Control: Planning for Air Quality dated January 2017.

The assessment would also need to consider whether the proposed scheme will impact on the Bodmin and Tideford Air Quality Management Areas.

## **Appendix C - Council's Environmental Protection (Contaminated Land)**

Thank you for consulting Environmental Protection, Neighbourhoods and Public Protection. The Phase 1 by Clarkebond ref: E05284-CLB-00-XX-RP-GE-01, dated: 23rd March 2020, has outlined potential contamination from made ground and landfill gas from the adjacent landfill and therefore requires further intrusive investigation. The conditions below should be attached to any decision notice for this planning application:

### **1. Contaminated Land ' Risk Assessment**

No development, other than demolition of any buildings or structures, shall commence until an assessment of the risks posed by any contamination shall have been submitted to and approved in writing by the local planning authority. This assessment must be undertaken by a suitably qualified contaminated land practitioner, in accordance with British Standard BS 10175: Investigation of potentially contaminated sites - Code of Practice and the Environment Agency's Model Procedures for the Management of Land Contamination (CLR 11) (or equivalent British Standard and Model Procedures if replaced), and shall assess any contamination on the site, whether or not it originates on the site. The assessment shall include: -

- a) a survey of the extent, scale and nature of contamination;

b) the potential risks to:

- human health;
- property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes;
- adjoining land;
- ground waters and surface waters;
- ecological systems; and
- archaeological sites and ancient monuments.

Reason: To ensure that the health risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the aims and intentions of the National Planning Policy Framework 2019 with specific reference to paragraphs 170 and 180 and Policy 16 of the Cornwall Local Plan Strategic Policies 2010 ' 2030, Adopted November 2016.

[A pre-commencement condition is required in this case because it is essential to establish before any works takes place the nature and extent of any ground contamination in order to safeguard the health of workers taking part in the development of the site and to ensure the appropriate design and subsequent safe occupation of the development].

## 2. Contaminated Land ' Remediation Scheme

No development shall take place where (following the risk assessment) land affected by contamination is found which poses risks identified as unacceptable in the risk assessment, until a detailed remediation scheme shall have been submitted to and approved in writing by the local planning authority. The scheme shall include an appraisal of remediation options, identification of the preferred option(s), the proposed remediation objectives and remediation criteria, and a description and programme of the works to be undertaken including the verification plan. The remediation scheme shall be sufficiently detailed and thorough to ensure that upon completion the site will not qualify as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to its intended use.

Reason: To ensure that the health risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the aims and intentions of the National Planning Policy Framework 2019 with specific reference to paragraphs 170 and 180 and Policy 16 of the Cornwall Local Plan Strategic Policies 2010 ' 2030, Adopted November 2016.

[A pre-commencement condition is required in this case because it is essential to establish before any works takes place the nature and extent of any ground contamination in order to safeguard the health of workers taking part in the development of the site and to ensure the appropriate design and subsequent safe occupation of the development].

## 3. Contaminated Land ' Verification Report following Remediation Scheme

The approved remediation scheme in condition (2) shall be carried out and upon completion a verification report by a suitably qualified contaminated land practitioner that demonstrates the effectiveness of the remediation shall be submitted to and approved in writing by the local planning authority before the development is occupied.

Reason: To ensure that the health risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the aims and intentions of the National Planning Policy Framework 2019 with specific reference to paragraphs 170 and 180 and Policy 16 of the Cornwall Local Plan Strategic Policies 2010 ' 2030, Adopted November 2016.

#### 4. Contaminated Land ' Reporting of Unexpected Contamination

Any contamination that is found during the course of construction of the approved development that was not previously identified shall be reported in writing immediately to the local planning authority. Development on the part of the site affected shall be suspended and a risk assessment carried out and submitted to and approved in writing by the local planning authority. Where unacceptable risks are found remediation and verification schemes shall be submitted to and approved in writing by the local planning authority. These approved schemes shall be carried out before the development is resumed or continued.

Reason: To ensure that the health risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the aims and intentions of the National Planning Policy Framework 2019 with specific reference to paragraphs 170 and 180 and Policy 16 of the Cornwall Local Plan Strategic Policies 2010 ' 2030, Adopted November 2016.

[Planning ref: PA20/04625 Our ref: SR20\_009159 MR]

#### **Appendix D – Council's Ecologist**

Should the development go ahead then the recommendations made in Sections 5.6 and 5.7 of the Preliminary Ecological Appraisal should be required by condition. If classified as a 'major' development - then it will be subject to the 10% biodiversity net gain and an assessment using the Defra metric along with plans of how the net gain will be achieved will be required.

In response to the questions posed in Section 6.1.1 of the Scoping report:

1 – it is agreed with approach of a narrowly focusses EIA aligned with the principles of EIA proportionality.

2 - overall it is agreed with the topics that been scoped out/in. It is noted that emissions to air have been scoped out of the EIA. Provided that existing mechanisms are in place and that these can cope with the increased levels of emissions then this

conclusion is agreed with but queries are made as to the methods/standards in place that will be used to objectively measure odour levels.

3 - it is agreed with the overall approach to the EIA set out in Section 5 of the report.

4 - although ecology has been scoped of the main EIA assessment it should remain as a material consideration.

5 - information pertaining to topics scoped out but remaining as material considerations should be included as Appendices to the ES.

## **Appendix E – Cornwall Council Historic Environment Planning (Archaeology)–**

We have consulted the Cornwall & Isles of Scilly Historic Environment Record and the submitted documents.

Although there are a number of prehistoric monuments (Bronze Age barrows) located nearby, one of which is a Scheduled Monument, and the site of a former military camp, the general lie of the land and contours away from these heritage assets, plus the previously disturbed nature of the land within this limited application area, suggests that there is nothing to be gained from an archaeological investigation should this proposal be brought forward as a planning application. Also, this site is not within an area of Anciently Enclosed Land.

In this instance we consider it unlikely that archaeological remains will be disturbed by groundworks.

RECOMMENDATION: Therefore, our scoping opinion is that no archaeological mitigation will be required and as a consequence no conditions will be sought.

## **Appendix F – Council's Senior Development Officer (Historic Environment Planning)**

There are no comments to make in relation to this submission.

## **Appendix G - Environment Agency**

### Environment Agency position

We have reviewed the submitted EIA scoping report for the proposed development at Cannon Bridge Waste Transfer Site. We have further comments to make in respect of groundwater protection to ensure that the environmental statement will appropriately address the environmental issues we consider are of importance for this proposal.

### Advice – Groundwater Environment



We recognise that 'Ground Conditions' is one of the topics to be subject to EIA, as outlined in section 4.3.26 onwards, however we consider that the further detail is required and the EIA should include the following topics:-

- the impacts on hydrogeology and the groundwater environment;
  - provide more information on the proposed construction methods. E.g. whether construction dewatering or piling shall be used, and what mitigation measures would be needed to protect the water environment?;
  - assessment of any impacts to surface water and groundwater abstractions.
- Also, the site surveys should include a door to door water features survey.

### Advice – Waste Management

From the perspective of waste management, we consider the scoping report to be acceptable in principle. We provide the following detail relating to environmental permitting implications of the proposal.

### The fire water tank and pump house

Suez were able to utilise the surface water system of the landfill site during a fire in 2017. The Installation landfill permit is due to be transferred from Suez to Cornwall Council. Consequently, the transfer will affect Suez's ability to utilise this surface water system. Following the transfer of permit a fire water tank and pumphouse will be needed to meet the requirements of an approved fire prevention plan.

As there is no permit condition requirement for the pumphouse, the facility falls outside of the Environment Agency's remit. However, noise pollution from this facility during testing procedures and incident use should be a consideration.

Chapter 16 of our Fire Prevention Plan guidance document currently states: You must have enough water available for firefighting to take place and to manage a worst case scenario. Depending on the site, this could be water in storage tanks or lagoons on site, or access to hydrants or mains water supply. A worst case scenario would be your largest waste pile catching fire. A water supply of at least 2,000 litres a minute for a minimum of 3 hours will be required for a 300 cubic metre pile of combustible material.

The volumes of water needed may be reduced if you have a system that lets the fire and rescue service re-circulate the water they are using to fight the fire (fire water). However, this water may need to be filtered and the fire and rescue service will also need to connect to your system. It may not always be appropriate or safe to re-circulate the water.

### Annual Throughput

The permit does currently permit an annual throughput of 49,000 tonnes.///// Any amendments to the throughput limit would be subject to the submission and approval of a permit variation application form. The proposal to remove this limitation would result in a variation to an installations permit.

Currently, the permit allows a pre-treatment shredding for recovery limit of 75t per day. An increase in this limit would require a permit variation to an installations permit, as per Section 5.4 A (1) b of the Environmental Permitting (England & Wales) 2016 Regulations:

#### SECTION 5.4 Disposal, recovery or a mix of disposal and recovery of non-hazardous waste

##### Part A (1)

(a) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment(4)—

- (i) biological treatment;
- (ii) physico-chemical treatment;
- (iii) pre-treatment waste for incineration or co-incineration;
- (iv) treatment of slags and ashes;

(v) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.

(b) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC—

- (i) biological treatment;
- (ii) pre-treatment of waste for incineration or co-incineration;
- (iii) treatment of slags and ashes;
- (iv) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.

#### Emissions to Air

The permit currently permits the acceptance of food waste and the site is already regulated under an Environmental Permit for dust and odour. However, if Suez were to proceed with the proposed development of a food waste reception facility, the Site Management Plan (or Working Plan) which is referred to as an operating technique document in the permit, would need to be amended and a risk assessment carried out. Amendments to the Site Management Plan requires agreement in writing from the Environment Agency, as required by condition 2.3.1 of the permit.

Condition 2.3.1 of the permit requires that activities should be operated using the techniques, and in the manner described in the documentation listed in Schedule 1, Table S1.2 of the permit, unless otherwise agreed by the Agency in writing. The Site Management Plan is one of the documents that falls under the operating techniques documents.

The scoping report makes reference to vehicular operated, fast activated shutter doors for the loading and unloading of food waste. We advise that it may be unlikely for the Agency to give consent to an operating technique without this proposal.

If the loading and offloading of food waste had to be done outside of the building, we would have difficulty in consenting an amendment to the operating techniques, because we would consider the activity to pose an unacceptable risk of odour pollution which would be likely to breach other conditions of the permit. Food waste is likely to be highly odorous. Odour is likely to escape from the facility doors, when opened, during loading or unloading activities. The doors may be open for prolonged periods if the facility is busy. We therefore would not consider that a proposal without vehicular operated, fast activated shutter doors minimises the risk of odour pollution, in accordance with condition 1.1.1 of the permit. In addition, it would not constitute appropriate measures in accordance with condition 3.2.1 of the permit.

We generally require highly odorous waste like food waste to be loaded and unloaded, as well as stored and treated, inside a building with extraction to an appropriate abatement system. Our published guidance states that the applicant must provide "effective containment and abatement for odorous materials and activities" with further guidance available at the following link: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#odour>

We also consider that the loading of food waste outside, may also pose unacceptable risks of amenity issues due to pests, namely flies being caused and likely breaches of permit condition 1.1.1.

### Clinical Waste Facility

Similar to the proposed food waste facility, if Suez are to proceed with the proposed development of a new Clinical Waste Facility the Site Management Plan (or Working Plan) which is referred to as an operating technique document in the permit, would need to be amended and a risk assessment carried out. Amendments to the Site Management Plan requires agreement in writing from the Environment Agency, as required by condition 2.3.1 of the permit.

### Drainage Consideration

We would normally require all areas where waste activities are taking place, including loading and offloading areas, to have impermeable surfaces and sealed drainage to foul sewer, to prevent polluting run-off from these areas to controlled waters.

Loading and offloading food waste in and out of lorries outside in an area without impermeable surfacing and sealed drainage it is likely to produce a polluting surface water run-off. This would be a failure to minimise the risk of pollution, and would be a breach of condition 1.1.1 of the environmental permit. In addition, it would not constitute appropriate measures to prevent emissions in accordance with condition 3.1.1 of your permit. Also, any pollution of inland waters other than in accordance with a permit (which this would not be) constitutes a direct offence under regulations 12 and 38 of the Environmental Permitting Regulations.

## **Appendix H – Council’s Principal Sustainable Drainage Officer**

The LLFA’s comments are as follows.

The proposed site sits within Flood Zone 1 based on the Environment Agency flood mapping data. The site is outside Critical Drainage Areas notified to the LPA by the EA. Mapping indicates some areas across the site which could be susceptible to surface water and groundwater flooding.

The LLFA has reviewed the FRA provided and is satisfied with the details contained within it. Proposals with respect to the drainage of the site should therefore be in accordance the principles set out in the FRA produced by Clarkebond Reference E05284/FRA dated 20/05/2020.

## **Appendix I – Council’s Highways Development Management Officer**

In addition to the information submitted, any subsequent application should include a full Transport Assessment. As well as addressing the matters raised by Highways England, in respect of the Cornwall network, junction assessments should also be undertaken at the following locations;

1. Junction of B3359/U6158 (this is the road from B3359 junction to site access)
2. Junction of B3359/A390 at East Taphouse.
3. Junction of B3359/ C0222 (this is the road running NW/SE from South of Kilmansag to A390 at Middle Taphouse)
4. Junction of C0222/A390 at Middle Taphouse.

This should include a modelling assessment (J9/Pic), accident data, and swept path tracking (with largest vehicle deployed) to demonstrate geometry can accommodate the capacity being demonstrated. It is noted that at a number of the junctions listed, there are visual indications on the ground that wide sweeping, and/or carriageway and verge damage occurs.

A narrative of how vehicle movements from the various uses of/activities at this site have changed over time. There should be a clear breakdown, of what this proposal will result in, in terms of traffic impact, in the context of wider uses of/activities at the site.

Issues raised by Parish Councils in public consultation will also need to be addressed. This may well include Traffic Management Plans for the wider operation, to mitigate the impact. I will be assessing highway safety and capacity matters, however, management of the wider residential amenity issues will be of interest to the Planning Officer.

Depending on the conclusions of the junction assessments above, it may be necessary to consider mitigation works to accommodate this proposal.

## **Appendix J – Natural England**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.

At present therefore it is not a priority for Natural England to advise on the detail of this EIA. We would, however, like to draw your attention to some key points of advice, presented in annex to this letter, and we would expect the final Environmental Statement (ES) to include all necessary information as outlined in Part 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. If you believe that the development does affect one of the features listed in paragraph 3 above, please contact Natural England at [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk), and we may be able to provide further information.

## **Appendix K – Highways England**

Highways England ("we") are a Statutory Consultee on Planning Applications under the Town and Country Planning (Development Management Procedure) Order 2015. In discharging this responsibility we act as a proactive partner and therefore welcome pre-application discussion, including the opportunity to provide advice on the scope of any Environmental Statement pursuant to the procedures set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, which also identified the Highways Agency (now Highways England) as a statutory party.

In your letter of 30 June you have invited Highways England to provide comments on the scope of an EIA Report in respect of development within the existing Connon Bridge Landfill Waste Complex to facilitate the introduction of Cornwall's new waste collection service design. The site is subject to a number of existing planning permissions for a range of waste uses with a current throughput limit for combined RDF/RTS uses of 49,000 tonnes per annum. There is no current restriction on vehicle numbers. The proposals primarily relate to providing facilities for receiving food waste and clinical waste to be bulked up for onward transportation and are expected to generate an additional throughput of 6,000 tonnes per annum. It is therefore proposed to also remove the current tonnage limit. It is understood that no changes are proposed to the existing HWRC.

Existing WTS operations are estimated to generate 98 two-way vehicle movements per day based on a throughput of 45,000 tonnes per annum. The proposed operations are predicted to generate a combined 204 two-way vehicle movements per day, operating Monday-Saturday.

We have set out below both the general and specific areas of concern that Highways England would wish to see considered as part of any Environmental Statement. The comments relate specifically to matters arising from our responsibilities to manage and maintain the SRN, in this case the A38 specifically.

Comments relating to the local road network should be sought from the appropriate Local Highway Authority.

#### General aspects to be addressed in all cases

- *An assessment of transport related impacts of the proposal should be carried out and reported as described in the current Ministry for Housing, Communities and Local Government (MHCLG) guidance on 'Travel Plans, Transport Assessments and Statements in decision-taking'.*
- *Environmental impacts arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported, along with the environmental impact of the road network upon the development itself.*
- *Adverse changes to noise and air quality should be particularly considered, including in relation to compliance with the European air quality Limit Values and/or Local Authority designated Air Quality Management Areas (AQMAs) and World Health Organisation (WHO) criteria.*

#### Location specific considerations

- *An assessment of traffic impacts should consider the operation of the SRN, in particular the A38 Twelvetrees Roundabout junction with the A390, in line with National Planning Practice Guidance and DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development. Where the proposals would result in a severe congestion or unacceptable safety impact, mitigation will be required in line with current policy.*
- *The effects of the proposed development should be assessed cumulatively with other schemes and we would expect the applicants to agree an appropriate list of schemes, including committed development in the area, with the relevant local planning authority.*

These comments are only advisory, as the responsibility for determining the final scope and form of the EIA Report rests with the local planning authority, and they imply no pre-determined view as to the acceptability of the proposed development in traffic, environmental or highway terms.

#### **Appendix L – Countryside Access Team –**

Thank you for consulting Countryside Access Team in respect of this Planning Application. I can confirm that Countryside Access Team in its role as Highway Authority for Public Rights of Way has NO OBJECTION to the proposals. Footpath 633/4/1 must remain open and accessible at all times.

#### **Appendix M – Ramblers Association (Cornwall) –**

Thank you for consulting the Ramblers. We have no objection to this proposal.

## **Appendix N – St. Pinnock Parish Council –**

The Parish Council object to this application for a scoping opinion and will strongly object to any further applications for the Connon Bridge site. The people of St Pinnock parish were promised that the site would close once the landfill ceased.

Residents have lived with the operations at Connon Bridge for many years. and the effect this has had on their lives, including the traffic movements thorough the village of East Taphouse. The site should now close leaving only the land restoration to be completed; and the current household waste recycling and shredder operations until their current planning permissions expire.

## **Appendix O – Broadoak Parish Meeting**

Thank you for the opportunity to consult on the subject Scoping Opinion request pertaining to Connon Bridge PA20/04625.

There are three areas of concern, which, in our opinion will impact the Scoping Opinion and the scope of the Environmental Impact Assessment (EIA).

### **1. Emissions to Air/Odour**

The installation of a food waste transfer station in support of the new Cornwall Council (CC) Waste contract due for delivery in late 2020/early 2021 raises significant concerns with regard to odour.

Whilst the food waste will only be kept on-site for a maximum of 72 hours (4.2.7; Scoping Report) it is relevant to note that the collected material will be up to 7 days old on the day of delivery to Connon. Putrefaction is therefore inevitable.

- With prevailing winds often from the southwest how will the applicant ensure that odours are not transmitted northwards from the site towards sensitive receptors in the event of any operational malfunction? The operational risks and their mitigations will need to be fully articulated within the EIA.

### **2. Vehicular movements.**

It is noted that:

- The planning application (PA20/04625) is a new application and not a variation to any existing site permissions
- That vehicular movements are unlimited at Connon Bridge under the current permissions (Section 4.3.3; Scoping Report).
- That local communities and the environment have benefitted greatly from the significant reduction in traffic following cessation of landfill activities in 2018. This



marked reduction was, in the past, used to justify the subsequent small(er) increase in vehicular movements seen when a shredding operation was established on-site in 2019.

Vehicular movements are now set to increase by over 100% (rising from 98 to 204 per day), Section 2.3.21; Scoping Report), to levels seen when the landfill site was in full operation. This equates to a vehicular movement along the B3359 and the A390 corridor every 3 minutes. This is considered highly significant.

Whilst not amplified within the scoping report over 60% of the projected increase in traffic movements are not related to the food waste stream at all, but to a diversion of road sweepings/fly tipping materials and other refuse collections from central Cornwall (Tregongeeves Site).

Disappointingly, none of the increased vehicular movements are to be powered by sustainable fuels (gas/electric/hybrid; pers. comm. CC).

In light of this order of magnitude increase in polluting diesel traffic levels

- The EIA should focus on the negative impact on air quality in East Taphouse and wider afield.
- The EIA must consider both traffic management in/out of site and road safety plans.
  - Congestion of the public highway at the site entrance is already a common issue and this is likely to be exacerbated if/when the number of vehicular movements double. Any traffic management plan needs to fully resolve this issue.
  - Consideration for safe pedestrian road crossing facilities in East Taphouse and other conurbations along the A390 corridor reflecting the significant projected increase in heavy traffic.

Note: In light of this unprecedented growth in traffic volumes it is likely that the Planning Authority will be asked in any subsequent application consultation to establish a daily cap on vehicular movements and total annual throughput at Connon Bridge (see also item 3 below).

### 3. Throughput Caps/Proportionality.

The Scoping Report (Section 2.3.19 and 20) proposes the lifting of the annual throughput limit (49,000 tonnes pa) at Connon Bridge. Elsewhere it argues under Proportionality (Section 3.2.2) that the EIA should not be onerous as the WR facility proposed is modest in size. This is completely contradictory.

- The scope of the EIA must be fit-for-purpose and therefore reflect either
  - A modest increase of c.6000 tonnes pa, or
  - Must be wide-ranging and detailed enough to support a facility with no ceiling on throughput.

In the latter case it is difficult to envisage how such an EIA might be scoped as there would be few physical parameters to constrain it.

## **Appendix P – Residents comments-**

First resident

### **1. Tonnages:**

The applicant has not demonstrated any compelling need to delete the site limit of 49,000 tonnes per annum:

- According to the PowerPoint presentations that Cornwall Council/SUEZ have given to the Parish Council and members of the public, the weights of what is currently contained in black bag waste coming to Connon will GO DOWN by a significant 39.3%/17,685 tonnes per annum.
- Cornwall Council have expanded the terms of this proposal by their plan to bring road cleansing materials from St. Austell and beyond to Connon Bridge. Although as yet they have not stated the additional tonnage that this will generate, they have indicated vehicle movements which will increase road sweeper movements to/from Connon by 925% and contribute to a 66% increase in overall vehicle movements which would indicate that they are planning to bring all of Cornwall's road sweepings to Connon.
- Road sweepings for the whole of Cornwall for the year 2016/17 amounted to 5190 tonnes.
- Even adding road sweepings to the residual+50% of food waste content in black bag waste (27,315 tpa) still allows a 'future proofing' capacity of 33.66%/ 16,495 tonnes per annum – which is three times more than the current 10.2%/5,000 tonnes per annum leeway.

### **2. Emissions to Air**

As the scoping report rightly states, the potential for odour from the site is of great concern locally, therefore 'Emissions to air' should not be scoped out of the environmental impact assessment as SUEZ have not demonstrated conclusively that odour emissions would be adequately controlled:

- "Putrescible wastes accepted on site will be removed from site within 48 hours, or 72 hours over a bank holiday weekend" - it could be up to a week old before it is even collected and could be in an advanced state of putrefaction and consequently extremely pungent.

- No mention is made of the delivery vehicles nor the vehicles taking it away – it is understood that they will be fitted with just a 'roller-blind' type cover which would not provide a very adequate air seal
- "Any particularly odorous materials delivered to the site will be rejected. Should the situation occur where a load does contain particularly odorous waste, this will be immediately placed in a quarantined area and removed by the end of the working day". Rejected and quarantined it might be, but it will still be accepted on site – and remain on site until the end of the working day.
- Based on the figures provided, the doors will be opened, on average, once every 19 minutes to admit/exit delivery vehicles throughout the working day. In addition to this must be added the visits by collection vehicles – which will increase the frequency of door opening still further. On each occasion, odours from the concentrated, rotting food waste will undoubtedly be released.

These factors cannot be summarily discounted and warrant serious consideration as an inclusive part of this EIA. The Applicant's contention that "It is the prospective applicant's contention that these sources of emissions can be adequately controlled to the extent that they would not result in significant effects on the environment" has not been adequately demonstrated and needs to be explored in greater depth than the applicant appears to wish.

3. There is no mention whatsoever in the Scoping Report regarding Cornwall Council's proposal to also divert to Connon Bridge an as yet undisclosed tonnage of 'road cleansing' materials by an additional fleet of 33 vehicles per day. This activity alone will increase 'road sweeper' movements by 925% from 8 movements per day to 74 per day with this activity alone contributing to a 66% increase in the overall vehicle movements to/from the site

Lorry movements to/from site for all activities increases by 104% from 100 movements per day to 204 movements per day.

These significantly higher additional vehicle movements to/from the site will detrimentally affect the A390 through East Taphouse in particular and the area in general – it therefore needs to be given specific and serious consideration in this Environmental Impact Assessment.

## Second resident

We can smell the methane on our farm even now when conditions are adverse, which impacts on our holiday cottage business. When it was an active tip, we could hear the lorries reversing, and after such a tough year, we do not need anything that will cause negative impact.

I would also make the point about there being other 'receptors' in the area who might be adversely affected by pollution other than those listed by the applicant -including homes and holiday lets in the locality as well as the members of the public visiting the recycling centre. The applicant should assess the likely environmental impact upon those and it is important that the developer demonstrate where they will not fully comply with EU standards to control pollution including air/water/ground pollution. On

airbnb alone there are 23 holiday properties listed, and the impact on existing businesses must be considered.