



**S.T.I.G.**

**St.Dennis Incinerator Group**

**June 2008**

## **Assessment of Alternative Sites**

### **Consultee Response to CERC Planning Application**

**Consultee**  
St.Dennis Incinerator Group (S.T.I.G.)

**Applicant**  
Sita Cornwall Ltd.

**Application Reference**  
08/00203/WAS

**Address of Proposal**  
Land at  
Rostowrack Farm  
St.Dennis  
St.Austell  
Cornwall  
PL26 8DX

**Proposal**  
Construct and Manage a  
240,000 TPA Energy Recovery Centre  
( Mass Burn Incinerator )

## Assessment of Alternative Sites

### CONTENTS

|   |    |
|---|----|
| Introduction.....   | 2  |
| Planning and Environmental Policy .....                           | 2  |
| The Planning System .....   | 2  |
| National Waste Strategy.....                                      | 3  |
| National Energy Policy .....                                      | 3  |
| National Planning Policy.....                                     | 3  |
| Regional Spatial Strategy .....                                   | 4  |
| Regional Waste Strategy.....                                      | 5  |
| Cornwall Structure Plan.....                                      | 6  |
| Cornwall Minerals Local Plan .....                                | 6  |
| Cornwall Waste Local Plan.....                                    | 6  |
| Emerging Waste Development Framework.....                         | 7  |
| Site Identification .....   | 8  |
| Methodology.....  | 8  |
| Site Identification .....   | 9  |
| Section 4 Short List Site Analysis.....                           | 9  |
| Operational Criteria .....  | 10 |
| Proximity to the Primary Route Network (A30) .....                | 10 |
| Potential for Landscape or Visual Intrusion .....                 | 10 |
| Potential Impact on Archaeology and the Historic Environment..... | 10 |

## Assessment of Alternative Sites

### Introduction

#### 1.1-1.5

##### STIG Response

The site of Rostowrack Farm has already been identified by Cornwall County Council as the site that they wish a mass burn incinerator to be built upon, furthermore the signed Integrated Waste Management Contract (IWMC) between SITA Cornwall and Cornwall County Council (CCC) is based on Rostowrack Farm. Indeed at a meeting between STIG and SITA (held at Kingsley Village 07) David Buckle stated there was no plan B, the only site was Rostowrack Farm.

Why carry out assessment of sites if SITA are required, as part of their IWMC with Cornwall County Council, “to obtain planning permission, develop and operate a 240,000 tonnes per annum energy from waste plant at **Rostowrack Farm** to manage Cornwall’s residual municipal waste.”

The site assessment for SITA by Terrance O’Rourke is clearly a paper exercise, as no other site will be accepted by CCC; therefore all attempts to make the site fit are both laughable and offensive to the people who will live in the shadow of SITA and CCCs proposals.

### Planning and Environmental Policy

#### The Planning System

#### 2.1-2.2

##### STIG Response

Whilst the application may be from SITA, in identifying the site Cornwall County Council have worked with, or indeed for, the applicant on this project. Even if Planning Officers are able to separate CCC’s partnership with SITA and the Planning Authority’s duty to carefully scrutinise the planning application, elected members appear to be prejudiced in favour of granting planning permission to the proposed Mass Burn Incinerator. Councillors are well aware of the potential financial penalties to be incurred by the County Council, and indeed we have been told by T. Greenwood of Terrance O’Rourke that this will be a material planning consideration. This places emphasis on elected members to pass the plans, and they should therefore not be empowered to decide this application.

## Assessment of Alternative Sites

### National Waste Strategy

#### 2.3-2.7

#### STIG Response

The applicant has conveniently forgotten to mention that one of the Government's key objectives in Waste Strategy 2007 (WS2007) sets the separate collection and treatment of food waste as the next frontier in the management of municipal waste by local authorities, with the emphasis on the potential of anaerobic digestion as a preferred new technology for the treatment of this waste stream.

The strategy is used misleadingly, as WS2007 makes clear that energy should be recovered only from residual waste that cannot viably be recycled. Food and garden waste, which could be both re-used **AND** produce energy will instead be burnt in the Mass Burn Incinerator, as there is no intention or incentive for householders to separate their organic waste.

Of the key objectives mentioned one mass burn incinerator to deal with the counties waste does not ensure recovery of energy from **residual waste** using a **mix of technologies**.

### National Energy Policy

No comment

### National Planning Policy

#### 2.12 – 2.13

#### STIG Response

Disposing of Cornwall's waste in a mass burn incinerator is only one step up the waste hierarchy, and does not ensure that greater emphasis is put on recycling or reuse, therefore significant investment is not being used to ensure that waste is dealt with in ways that are more desirable. This is counter to the need to move waste up the waste hierarchy as required by PPS10.

PPS10 has a self-sufficiency objective that communities should take more responsibility for their own waste, but the proposal supports the creation of a highly centralized disposal facility with waste transferred from across the whole of Cornwall.

The site is further in conflict with PPS 10 as the site has serious implications for:-

## Assessment of Alternative Sites

### **The Protection of Water Resources**

HGVs transporting toxic waste will cross The River Fal via a purpose built bridge. A stream which is a tributary to the River Fal is within 100m of the site. Within the application they offer little by way of information to assess whether or not they will be able to ensure water safety for the next 25 - 30 years.

### **Visual Intrusion**

SITA have stated both in application documents and at SITA liaison meetings that visual impact cannot be mitigated for the surrounding area.

### **Nature Conservation**

The site is in close proximity to NNR, SSSI's and SAC's

### **Historic Environment and Built Heritage**

The historic view from St.Dennis Church will be ruined, one that CCCs "Hensbarrow Report" recommends as being preserved.

### **Potential Land Use Conflict**

The green field site is currently used agriculturally, if the proposals are passed this will see valuable farm land being taken out of use

Whilst the site may have been chosen because of its proximity to the rail network, both CCC and SITA have stated that it is not economically viable to transport waste via rail. There is no intention to ensure that waste is transported in ways other than by road. It can therefore only be seen as an attempt to make the site fit.

## **Regional Spatial Strategy**

### **2.19**

#### **STIG Response**

There are no plans for composting householder's food or garden waste; therefore the targets set in RSS10 will not be met. D. Buckle of SITA has stated that unless food and garden waste is separated recycling levels in Cornwall will NEVER better 35%.

## Assessment of Alternative Sites

### 2.22

#### STIG Response

The disposal of the hazardous waste in a Gloucestershire landfill goes against RSS W1, as they are not well located relative to the western peninsula of the south west region.

One mass burn incinerator to deal with the counties waste is in clear conflict with the Proximity Principle, further more a green field site that is used agriculturally cannot be seen as an :-

- Established industrial site or
- Previously developed land

Therefore the proposals conflict with RSS W2

### Regional Waste Strategy

### 2.24

#### STIG Response

One mass burn incinerator does not comply with the waste hierarchy or ensure provision of suitable facilities to deal with waste arisings.

### 2.25

#### STIG Response

St.Dennis, Treviscoe and the surrounding areas do not produce 240,000 tpa of waste, therefore waste is not being treated close to where the waste arises, therefore the proposals do not comply with the Proximity principle.

### 2.26

#### STIG Response

The proposals are not in an industrial site; indeed the applicants themselves describe the land as set in a rural area. Furthermore the proximity of the site to the residents of St.Dennis and Treviscoe is in contradiction to Cornwall County Councils Sustainability Appraisal 2005 (Review issue Q Page 29) which states that "These issues coupled with public concerns about health impacts are principal determinants

## Assessment of Alternative Sites

of a suitable location for a waste facility. A 6 Km. to 10 Km. separation from housing of any type may be suitable but greater separation may be appropriate”.

### Cornwall Structure Plan

#### 2.27

##### STIG Response

One mass burn incinerator is only sustainable through the creation of waste, and does not shift disposal away from landfill as 11,000 tpa will still need to be land filled.

### Cornwall Minerals Local Plan

#### 2.30

##### STIG Response

A mass burn incinerator is NOT an ancillary to the China Clay Industry, therefore the proposals go against policy CC4 of the Cornwall County Council's Minerals Local Plan and is a misuse of land. Just because the site is identified in the Local Mineral Plan it does not qualify the site for a waste plant anymore than it does qualify it for an international airport.

### Cornwall Waste Local Plan

#### 2.33

##### STIG Response

The proposals go against key locational recommendations made in the Waste Local plan 2002.

It does NOT provide adequate safeguards for the natural and historic environment and local amenity and surrounding land uses; In 2004 Cornwall County Council published the Cornwall Industrial Settlements Initiative (CISI) St.Dennis (Hensbarrow Area). Recommendation: 5 states “Protect historic landscapes around the village. Pursue designations recognising the intrinsic value and importance of historic landscapes, including the remnant medieval field system and associated hamlets. Reason: To preserve and enhance the valuable historic landscapes and the historic context of St.Dennis within the wider environment of the expanding china clay industry” (Page 24). Recommendation 13 further states that back land and tracks be recognised as they are ‘an important aspect of St.Dennis’ character. Reason: To preserve and enhance St.Dennis character’ (Page 26)

## Assessment of Alternative Sites

It does NOT realise opportunities for improving the environment through, for example, the restoration and rehabilitation of derelict or despoiled land or formal mineral workings as the land is Green field.

### 2.34

#### **STIG Response**

The construction of a new road and bridge cannot be viewed as excellent transport links, the rail link will not be used therefore it seems hypocritical that sites which don't offer rail links can be dismissed.

### 2.36

#### **STIG Response**

The chosen site is in conflict with Policy L6a as: -

It DOES harm landscape features, extensive areas of semi-natural vegetation, hedgerows or trees and significant landscape or nature conservation importance.

It DOES cause loss of important local landscapes; the view from the church will be ruined and cannot be mitigated The translocation of Cornish Hedges will severely impact on the environment of natural flora and fauna, further more with its stack of over 400feet, it will desecrate the historic landscape which is recommended as being preserved and enhanced.

It DOES cause significant impact on the visual amenity of local residents or recreational users. A 120 m stack cannot be mitigated. The close proximity of the site to the village of St.Dennis will ensure that it is seen from every angle. A gold status footpath will have to be rerouted, affecting not only recreational users but people who use the footpath to access services in St.Dennis from Treviscoe.

## **Emerging Waste Development Framework**

### 2.38

#### **STIG Response**

St.Dennis had four days with which to respond after CCC public consultation. Four days for the residence of St.Dennis to respond cannot be viewed as extensive consultation.

## Assessment of Alternative Sites

### 2.40

#### STIG Response

The following quote from D. Whalley shows that St.Dennis is the ONLY preferred site.

"While I sympathise with the people in St.Dennis, it will be good for the village". He further comments that: "It will bring new jobs into the area and will provide some additional employment. It will also provide heat at a very much reduced rate to make sure the factory that is already there remains viable, so there are some positives there." (July 2005 BBC News)

As the quote above demonstrates, Cornwall County Council has made their view on the planning application clear, nearly two years before the planning application is submitted !

### 2.41

#### STIG Response

How can the Development Plan Document (DPD) containing sites for waste management facilities be published (as a Preferred Options Report) in August 2010 two years after the submission of planning application for a Mass Burn Incinerator?

## Site Identification

### 3.7

#### STIG Response

Availability of land is the primary reason Rostowrack Farm has been chosen by CCC and SITA. If a site is not available than it cannot be viewed as viable in any circumstance. CCC has stated that they would never have compulsory purchased land to site a Mass Burn Incinerator.

## Methodology

No Comment

### 3.1-3.6 The area of search

No comment

## Assessment of Alternative Sites

### Site Identification

#### 3.7

##### STIG Response

Why is availability of land not shown for each site if it is the last factor in deciding the suitability of land?

#### 3.10

##### STIG Response

Why is Imerys land not excluded at this point as there are operational and planning difficulties in obtaining their sites? The inclusion of these sites does not focus on those sites that could realistically represent alternative locations for the CERC.

### Section 4 Short List Site Analysis

##### STIG Response

#### Site 3 - Rostowrack Farm, St.Dennis

##### Current Use: Agriculture (Grade 3).

The applicant does not state whether this is 3a or 3b in this part of the application. If the land is graded as 3a it would be considered as unsuitable to build on due to its agricultural importance.

Elsewhere in the document it states that the site comprises of over one hectare of grade 3a land the remaining being grade 3b.

##### Site Size: 8.45 Ha (this area includes a strip of land to provide access to the minor road at Treviscoe to the west).

The strip of land was negotiated, with money exchanging hands, between CCC and Mr. Jewels prior to the planning application and the assessment of alternative land by Terrance O'Rourke for SITA. This demonstrates CCCs certainty that the plans will be passed.

## Assessment of Alternative Sites

### Operational Criteria

#### Proximity to the Primary Route Network (A30)

Please see STIG Responses made in “Transport”

#### Potential for Landscape or Visual Intrusion

STIG would like to challenge the view partially meets criterion.

#### Potential Impact on Archaeology and the Historic Environment

There are no known areas of archaeological or historic importance within or directly adjoining the site.

Meets criterion.

STIG would like to challenge this view as the historically important view from St.Dennis Church will be violated.