

APPENDIX ES2.3

SCOPING OPINION PROVIDED ON 23 NOVEMBER 2023

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Case Officer: Mr A O Jones
Our Ref: 23/00001/SCOP
Your Ref:

PETERBOROUGH



**City Of Peterborough
Sand Martin House
Bittern Way
Fletton Quays
Peterborough
PE2 8TY**

**DX 12310 Peterborough 1
Telephone: [REDACTED]**

Ms Sophie Serdetschniy
Augean South Ltd
Baddesley Colliery Offices
Main Road
Baxterley
Atherstone
Warks
CV9 2LE

23 November 2023

Dear Sir/Madam

**Request for Scoping Opinion
Scoping opinion in respect of EIA for Revised Restoration Platform
Cooks Hole And Thornhaugh Landfill Site Leicester Road Thornhaugh Peterborough**

Further to your enquiry received on 16 October 2023, in respect of the above, the Local Planning Authority makes the following comments:

This Scoping Opinion is based on the following report (hereafter referred to as 'the report');

PROPOSALS FOR THE APPROACH TO AND SCOPE OF AN ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL STATEMENT TO ACCOMPANY THE PROPOSED PLANNING APPLICATION FOR A REVISED RESTORATION LANDFORM AT COOKS HOLE QUARRY AND THORNHAUGH LANDFILL SITE, LEICESTER ROAD, THORNHAUGH, PETERBOROUGH, Report reference: AU/CH/SPS/1774/01/SR/F, dated October 2023

Background

Thornhaugh I landfill and the neighbouring Cook's Hole Quarry are owned and operated by Augean South Ltd. Thornhaugh I has permission to accept non-hazardous and stable non-reactive hazardous waste

The proposal seeks to revise the restoration schemes for Cook's Hole and Thornhaugh I to provide an integrated, coherent land form for both sites. This will be achieved through the importation of some 1.35 million cubic metres of clean naturally occurring materials extracted as part of the existing landfill construction (at Thornhaugh I) and as part of the future construction operations for the landfill at the East Northants Resource Management Facility (ENRMF) operated by Augean at King's Cliffe (which lies some 3.5km to the west).

The proposal seeks the continuation of mineral processing from mineral stockpiles at Cook's Hole and the continuation of existing landfilling operations at Thornhaugh I (including the extraction and redeposition or processing of historically deposited waste, albeit there will be changes to the phasing of infill at Thornhaugh I. The maximum elevation of the highest point of the restoration landform at Thornhaugh I (71.5m AOD - pre-settlement) would not change.

The proposal would retain the use of the existing access (to both sites) at Thornhaugh I from the A47 during operations, with post restoration amenity access to be provided at the former Cook's Hole entrance alongside a car park for approximately 12 cars.

Ecology and biodiversity

Natural England have provided some generic advice with regard to the general principles of Environmental Impact Assessment, and specifically highlight the following Sites of Special Scientific Interest which may be affected by the development, including;

- Bedford Purlieus
- Bonemills Hollow
- Wansford Pasture
- West Abbot's and Lound Woods

and advise that an Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSIs and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

The Wildlife Officer has confirmed their agreement that the proposed scoped in aspects (in relation to the Ecology section) represent the full potential impacts of the development as outlined within the report.

It is noted and agreed that the Biodiversity Net Gain baseline for assessment is the currently approved restoration schemes for Cook's Hole and Thornhaugh I.

Landscape and visibility

The proposed scope of the Landscape and Visual Impact Assessment is acceptable, and the appropriate character areas identified. The proposed viewpoints have been discussed, and advice provided with regard to their suitability in an email to Sophie Serdetschniy 9 November 2023, albeit three of recommended viewpoints relate specifically to assisting with the visual assessment of the heritage setting of the Cook's Hole farmhouse.

Cultural heritage

It is acknowledged that there is no potential for buried archaeology to be present and therefore no requirement for assessment of potential impacts on buried archaeology.

The Conservation Officer (CO) advises that there are three separate aspects of the proposal which should be assessed from a conservation perspective; historical views between different heritage assets, specific views of the Listed Cook's Hole farmhouse, and views along public rights of way of the various heritage assets; these viewpoints have been identified and shared via email as for the LVIA.

It is acknowledged and accepted that there will be no discernible visible impact from proposed viewpoint number 5 (i.e. that from Thornhaugh village) and as such is it not considered necessary to demonstrate this, although an additional viewpoint from Sibberton Lodge (not 'Stibbington' as mistakenly called in the CO comments) is recommended. The three proposed additional viewpoints (on footpath numbers 2 and 4) are considered appropriate to assess how the Cook's Hole farmhouse will be appreciated at a closer location.

Water resources and Flood risk assessment

The Environment Agency have confirmed that no further groundwater assessments would be required, and it is accepted that assessments previously undertaken in 2015 for Thornhaugh and 2011 for Cook's Hole concluded there would be no significant risk to groundwater or surface water quality as a result of previously approved operations. The proposed scope focusing on surface water run off generation at the sites is therefore considered to be acceptable and consideration should be given to the potential effect of future climate change on the intensity of storm events.

Traffic and transport

The report does not clarify the proposal with regard to how the mineral to be processed at Cook's Hole will be used; it is expected that any application would be clear as to whether any minerals to be processed at Cook's Hole are intended to be exported from the site such that an accurate traffic assessment can be undertaken.

The Local Highways Authority have confirmed that the Environmental Statement should include a Transport Statement comparing the proposed development with the existing consents and the historic and current flows with regard to forecast traffic flows until 2042. Full details of the proposed access to the car park to be retained post restoration for amenity purposes should also be provided.

Noise

The Pollution Control Officer has not identified any issues with the proposed scope of the noise assessment. It is acknowledged that there have been no new developments or activities in the vicinity of the sites that would be considered significant enough to notably change the baseline acoustic environment and that noise sensitive receptor locations remain appropriate.

Amenity and dust

The Pollution Control Officer has confirmed that PM10 has not been identified as a significant risk to human health that requires further assessment as part of the proposals for the site, although a dust assessment will be required as set out in the report.

Climate change and major accidents

It is agreed that it is not necessary to provide a separate chapter on climate change, and instead ensure that the predicted effects of climate change are addressed in the flood risk and surface water assessments.

Given the sites location within an Aircraft Safeguarding Zone, sufficient information needs to be presented with any application to ensure compliance with the requirements of the safeguarding zone.

Other issues

The EA advise that Thornhaugh landfill site currently has an environmental permit which includes groundwater monitoring, and that the proposed restoration at Cook's Hole will also require a permit as it involves the use of quarry wastes and the importation of inert material. The permit application process may require additional groundwater assessment / monitoring.

Any application will require clarity as to the extent of mineral working, and whether this will be exported off site.

The proposal describes the continuation of landfilling at Thornhaugh; given that any new application would, if approved, result in a new permission, it is imperative that all aspects of the existing approved operations that are proposed for continuation are clearly set out, and will require sufficient information for assessment given the passage of time since original approvals may have been granted and any changes to the legislative framework in the intervening period.

Conclusion

Any planning application further to the 'Report' should be accompanied by an Environmental Statement covering the topic areas as set out above.

Notwithstanding the above comments, I would advise that the Local Planning Authority is not precluded from requesting additional information either in respect of the application, should it be made, or in relation to the determination of the planning application for which the proposal relates.

The above represents the opinion of the Local Planning Authority as to the scope of the issues likely to be of relevance within the local authority area which are to be addressed by any planning application. If you have any queries, please do not hesitate to contact me.

Yours faithfully



Adrian Chapman
Executive Director: Place and Economy

Mr A O Jones
Peterborough City Council
Sand Martin House Bittern Way
Fletton Quays
Peterborough
PE2 8TY

Our ref: AN/2023/134936/01-L01
Your ref: 23/00001/SCOP
Date: 08 November 2023

Dear Mr Jones

**Scoping opinion in respect of EIA for revised restoration platform
Cooks Hole and Thornhaugh Landfill Site, Leicester Road, Thornhaugh,
Peterborough**

Thank you for your email dated 12 October 2023 seeking our views on the proposed Environmental Impact Assessment (EIA) scoping opinion for the above site.

Environment Agency position

We have reviewed the submitted scoping report (prepared by MJCA, ref: AU/CH/SPS/1774/01/SR/F, dated October 2023) and wish to make the following comments.

We agree that no further groundwater assessments would be required for this proposal. This is due to the application being mainly for continued operations at both sites with a more joined up restoration scheme.

Thornhaugh Landfill site currently has an environmental permit which includes groundwater monitoring. The proposed restoration at Cooks Hole will also require an environmental permit as it involves the use of quarry wastes and will import inert material. The permit application process may require additional groundwater assessment/monitoring. Please contact the Environment Agency on enquiries@environment-agency.gov.uk if you would like further advice relating to the type of permit required and the permit process.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Rebecca Flint
Sustainable Places Planning Adviser

Direct dial [REDACTED]
Direct e-mail [REDACTED]@[environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Environment Agency
Ceres House Searby Road, Lincoln, Lincolnshire, LN2 4DW.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

End

Consultation Response CONSERVATION OFFICER

CONSERVATION TEAM REF.	BC
CONSERVATION OFFICER	Mr Daniel Worley
CASE OFFICER	Mr A O Jones
APPLICATION NO.	23/00001/SCOP
PROPOSAL	Scoping opinion in respect of EIA for Revised Restoration Platform
LOCATION	Cooks Hole And Thornhaugh Landfill Site Leicester Road Thornhaugh Peterborough

Recommendation

There are considered to be three separate aspects of the proposal which should be assessed from a conservation perspective.

The first is historical views between different heritage assets, specific views of the Listed farm Cooks Hole within the site and views along public rights of way of the various heritage assets.

Views Between Heritage Assets

The relevant heritage relationships which are considered to potentially be impacted from these proposals are Thornhaugh Village, Sibbington Lodge and Home Farm.

The proposed views 1 for Home Farm and 5 for Thornhaugh are considered to be sufficient for this towards the asset but there is a question regarding this in the other direction. If it is demonstrated that there is no impact or the impact is complete then this can be understood and assessed but if there is some intermediate impact then this may require an understanding of the relationship change from both directions.

With regard Stibbington Lodge, the relationship is considered to be less and in combination where the change in landscape which is proposed to occur the any impact will be less. However there is a question why there are no landscape aspects from the east along the A47 have not been included within the analysis as this appears to be a general hole with the proposed analysis. If this were to be included, it would probably also be a good equivalent for this relationship

Rights of way

The proposed view numbers, 1, 3, 4 and 8 are considered sufficient to capture the impact along the route from a distance from the heritage asset. There is a question regarding the views from the heritage asset outwards along these public rights of way and also how Cooks Hole will be appreciated at a closer location.

As such there needs to be views from Cooks Hole looking eastward (and southward if there are proposed material changes in this direction) and of Cooks Hole from the east and south.

Specific Views of Cooks Hole Farm complex

All of the proposed views are from a distance and do not capture how Cooks Hole will be appreciated within the landscape from a close but not immediate distance. As such these must be views assessed. The views from the east and south along the public right of way will presumably correspond with those required above.

In addition, as the building is Listed, its significance is not just from public locations but also how it is appreciated in the wider landscape. As such, in addition to the two aforementioned locations a view from the west should be considered. These three points should be sufficient to ensure that a holistic understanding of how Cooks Hole will be appreciated in its environment can be ascertained.

Wider considerations

Although not specifically heritage considerations, the LVIA is a useful tool to gain a broader understanding of the change on setting for the area. As such here is a question regarding why views from the East and South appear to have been omitted from the proposals.



Historic England

Mr Alan Jones
Peterborough City Council
Planning Services
Sand Martin House, Bittern Way
Fletton Quays
Peterborough
PE2 8TY

Direct Dial: [REDACTED]

Our ref: PL00794319

7 November 2023

Dear Mr Jones

**Cooks Hole and Thornhaugh Landfill Site Leicester Road Thornhaugh
Peterborough - Scoping opinion in respect of EIA for Revised Restoration
Platform
Application No. 23/00001/SCOP**

Thank you for your letter of 18 October 2023 consulting Historic England about the above EIA Scoping Opinion.

Historic England provides advice when our engagement can add most value. In this case we are not offering detailed advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist archaeological and conservation advisers.

It is not necessary to consult us on this application again, unless there are material changes to the proposals.

If you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

Dr James Albone MCIfA

Inspector of Ancient Monuments (Cambridgeshire & Norfolk)

Tel: [REDACTED]

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Email: [REDACTED]@HistoricEngland.org.uk



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Planning Application Consultation Response

Peterborough City Council, Local Highway Authority (LHA)

Application No:	23/00001/SCOP	Case Officer: Alan Jones
Address:	Cooks Hole Quarry And Thornhaugh Landfill Site, Leicester Road, Thornhaugh, Peterborough	Date: 30 th October 2023 Response by: Sarah Hann (SC)
Proposal:	Proposals for the approach to and scope of an environmental impact assessment and environmental statement to accompany the proposed planning application for a revised restoration landform	

Recommendation:

The EIA should include a TA relevant for reasons explained under Assessment/Comments.

Recommended condition(s) / Reason(s) for refusal:

Please provide condition(s) required, including reasoning or specific reason(s) for refusal

N/A

Required amendments/information:

N/A

Assessment / Comment

Para 4.1 of the Scoping Study (SS) states '***The detailed design for the proposed development is being finalised. The design development process is iterative and will continue until the submission of the planning application with continued dialogue with stakeholders.***' The scheme involves continued landfill, extraction, stockpiling of existing sites up until 2042. In particular, the schemes involves amendment of the restoration profiles for Thornhaugh and Cooks Hole to form one

integrated, coherent landform. Also of particular note from a highways point of view is that:

- a) The continuation of the use of the existing Thornhaugh access.
- b) The importation of in the order of 1.35 million m³ of clean, naturally occurring material from ENRMF to create the landform of Cooks Hole and to tie in with the landform at Thornhaugh.
- c) Use of amenity access from the A47 at Cooks Hole following restoration and the
- d) provision of a small car park for approximately 12 cars

Para 5.12 advises that: ***There are no changes proposed to the main site access as a result of the proposed development. Historically the vehicle movements associated with the sites have been up to 255 Heavy Goods Vehicles (HGVs) per day or 510 HGV movements (255 HGVs in and 255 HGVs out). In the assessments carried out as part of the 2015 Environmental Statement which was submitted with the planning application for planning permission reference 15/00230/MMFUL. it was assumed that the combined vehicle movements associated with the sites was 118 HGVs or 236 HGV movements (118 HGVs in and 118 HGVs out). It is anticipated that the HGV movements associated with the proposed development will not exceed the historical traffic movements associated with the operations of the site or the traffic numbers presented in 2015. Given that the vehicle numbers associated with the proposed development will not increase, it is considered that it is not necessary to assess the impacts of the proposed development on traffic therefore a transport statement is not included in the scope of the EIA.***

The A47 adjacent to the site is subject to a de-restricted speed limit. The carriageway width in the vicinity of the proposed site is approximately 8.4 metres. Footways are not provided on the A47. The site entrance to Thornhaugh Landfill Site which is also used to access Cooks Hole Quarry has a width of approximately 14 metres and is designed for simultaneous arrivals and departures of HGVs. The site access was improved a number of years ago to DMRB standards in accordance with the requirements of the Highways Agency. The access comprises of a wide bell mouth junction with visibility splays to full standards (4.5 x 215 metres) for vehicles emerging onto the A47 and a 25 metre exit taper for left turning vehicles.

I understand the current planning consent (i.e. 15/00230/MMFUL) related to completion of works at. The Transport Assessment (TA) pertaining to that consent considered a context relevant at that time. As such I consider that the EIA should produce, for completeness, a new TA that would relate to the current context in terms of forecast traffic flows up until 2042. This will include giving consideration to:

- a) assessing whether the existing access is fit for purpose up until 2042
- b) the forecast flows taking account of relevant committed development at the access and other relevant junctions within the schemes sphere of influence.
- c) the latest 5 year recorded accident data to examine themes and cluster if relevant.
- d) the adequacy of the routes taken by traffic that will be importing material

In conclusion, as the scheme has yet to be finalised I consider that its premature to assume that a TA will not be required. For completeness, a TA should accompany the EIA and its scope and content

should be agreed with the LHA through the local planning authority in advance of the submission of the planning application.

Planning Policies / Legislation

Reference to Local Plan or national planning policies/guidance

Date: 07 November 2023
Our ref: 455469
Your ref: 23/00001/SCOP



Peterborough City Council
BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Sir or Madam,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Scoping opinion in respect of EIA for Revised Restoration Platform | Cooks Hole And Thornhaugh Landfill Site Leicester Road Thornhaugh Peterborough

Location: Cooks Hole And Thornhaugh Landfill Site Leicester Road Thornhaugh Peterborough

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 18 October 2023 ,received on 18 October 2023.

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.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours faithfully

Julian Clarke
Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 174-175 and 179-182) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to have regard to conserving biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

Nationally designated sites

The development site is within or may impact on the following **Site of Special Scientific Interest**:

- Bedford Purlieus
- Bonemills Hollow
- Wansford Pasture
- West Abbot's and Lound Woods

The development site is within the following **National Nature Reserve**:

- Bedford Purlieus

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 180 of the NPPF. Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportals](#).

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN

can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

The ES should use an appropriate biodiversity metric such as [Biodiversity Metric 3.0](#) together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 174 and 175 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable

use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

The following additional guidance is provided for minerals and waste development. The ES should consider and, where appropriate, include the following:

- The methods and equipment to be used for the protection, recovery, storage, and sustainable re-use of the different types of topsoil and subsoil, including consideration of any required phasing to minimise soil handling and maximise the sustainable management of the soil.
- The method of assessing whether soils are in a suitably dry condition to be handled (i.e. dry and friable), and the avoidance of soil handling, trafficking, and cultivation during the wetter winter period.
- A description of the restoration criteria, including the proposed soil horizon depths and soil characteristics; normally to an overall depth of 1.2 m over an evenly graded overburden layer (or, in the case of waste reclamation, an evenly graded capping layer), suitable for the proposed end-use, including the restored ALC Grade.
- The effects on land drainage, agricultural access, and water supplies, including other agricultural land in the vicinity. The impacts of the development on farm structure and viability, and on other established rural land use and interests, both during the site working period and following its reclamation.
- The restoration and aftercare of the site, in line with Chapter 17 'Facilitating the Sustainable Use of Minerals' of the NPPF.
- A detailed Restoration Plan illustrating the restored soil profile characteristics, landform and the intended standard of restoration including ALC Grade(s), together with details of surface features; water bodies; the availability of outfalls to accommodate future drainage requirements; and aftercare.

Further guidance is contained in the [Defra Guidance for Successful Restoration of Mineral and Waste Sites](#) and the Natural England guidance note [Planning and aftercare advice for reclaiming land to agricultural use](#). Reference could also usefully be made to the Institute of Quarrying (2021) [Good Practice Guide for Handling Soils in Mineral Workings](#) which comprises separate sections, describing the typical choice of machinery and methods for handling soils at various phases. The techniques described by Sheets A-D are appropriate for the successful reinstatement of higher quality agricultural land. The Natural England [Guide to reclaiming mineral extraction and landfill sites to agriculture](#) also contains useful background information.

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change

Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

23/00001/SCOP - Scoping opinion in respect of EIA for Revised Restoration Platform

Jessica Hand <[REDACTED]@peterborough.gov.uk>

Mon 13/11/2023 16:01

To: Alan Jones <[REDACTED]@peterborough.gov.uk>

Cc: Png Control Enquiries <[REDACTED]@peterborough.gov.uk>

Good afternoon,

Planning reference: 23/00001/SCOP

Proposal: Scoping opinion in respect of EIA for Revised Restoration Platform

Site address: Cooks Hole And Thornhaugh Landfill Site, Leicester Road, Thornhaugh, Peterborough

The Scoping report for the Environmental Impact Assessment by MJCA (October 2023, ref AU/CH/SPS/1774/01/SR/F) has been reviewed and the following comments are relevant to noise and dust management at the site.

The existing conditions for noise and dust at the site provide sufficient protection therefore any assessments made are necessary to show that the proposed works will adhere to the current conditions. If the proposed works are unable to adhere to the existing conditions, details of further mitigation measures to ameliorate significant impacts will be required.

Noise:

As included in the scoping document, noise limits at the identified near sensitive receptors for the operations at Cooks Hole are specified planning permissions referenced 15/00229/MMFUL, 13/01372/WCMM and 13/01374/WCMM. Where the existing noise limits provide sufficient protection.

As set out in Sections 5.14 - 5.17 of the document a noise assessment considering the noise impact of the proposed operations will be necessary. The results will be presented against the existing noise limits for the site.

Dust and particulates:

Section 5.20 of the document by MJCA states "The annual background PM10 concentration for both sites in 2021 was 13.93µg/m³ which is well below the national air quality objective for PM10. As the background annual PM10 concentration for the site is below 17µg/m³ (the screening value specified in the IAQM guidance¹² for potential health effects) there is little risk that the process contribution from the proposed development would lead to an exceedance of the annual mean air quality objective for PM10 hence an assessment for the potential for dust to affect human health will not be undertaken and is not included in the scope of the EIA."

PM10 has been considered previously with respect to current operations and has not been identified as a significant risk to human health that requires further assessment as part of the proposals for the site.

As set out in sections 5.21 and 5.22 of the document, a dust assessment will be required to determine potential dust impacts and detail the proposed mitigation measures.

Kind regards,

Jessica Hand

Pollution Control Officer
Rutland County Council

Catmose
Oakham
LE15 6HP

Mobile: 

Please note, this service is delivered by Peterborough City Council on behalf of Rutland County Council.

**PLANNING SERVICES
PLANNING COMMENTS**

From: Tree Officer, Mr Stephen Chesney-Beales

To: Case Officer - Mr A O Jones

Application No. 23/00001/SCOP

Proposal: Scoping opinion in respect of EIA for Revised Restoration Platform

Location - Cooks Hole and Thornhaugh Landfill Site, Leicester Road, Thornhaugh Peterborough

Evening Matt

Thank you for requesting comments with regards to the above Scoping Opinion, please note the following comment in response:

I'm happy to accept the submitted detail and proposals within the Scoping Report and have no further comment to make at this time.

If you wish to discuss the matter further, please do not hesitate to contact me.

Many thanks & kind regards

Steve

Signed: S Chesney-Beales

Date: 7 November 2023

**PLANNING SERVICES
PLANNING COMMENTS**

From: Wildlife Officer, Mr Rowan Rumball

To: Case Officer - Mr A O Jones

Application No. 23/00001/SCOP

Proposal - Scoping opinion in respect of EIA for Revised Restoration Platform

Location - Cooks Hole And Thornhaugh Landfill Site Leicester Road Thornhaugh Peterborough

Comments:

Thank you for the opportunity to comment with regard to the scoping opinion request above. I have the following observations to make in relation to both how the proposal is to be submitted to planning and the Ecology section of the ES Scoping Report.

Planning submission proposal:

I agree with the proposed potential impacts of the development outlined within the EIA Scoping Report (MJCA, October 2023) and agree that the baseline as described represents a realistic depiction of the surrounding habitat.

In respect to the ecological aspects of the proposal I agree with the EIA Scoping Report that an EIA is required and the scoped in aspects represent the full potential impacts of the development.

I trust that this is helpful, please do not hesitate to contact me if I can be of further assistance or you have any outstanding ecological concerns.

Signed:

Date: 9 November 2023