The Planning Inspectorate

EIA PART 3 ENVIRONMENTAL STATEMENT REVIEW PROFORMA
The Town and Country Planning (Environmental Impact Assessment) Regulations 1999 [Schedule 4 Part 2]

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Inspector: not yet assigned | PINS Ref: APP/M1900/V/13/2192045

Date of Review: 19 April 2013

SITE LOCATION: New Barnfield, Hatfield, Hertfordshire

DEVELOPER: Veolia Environmental Services
CONSULTANT CONTACT: Joanne Demetrius, Veolia **TEL:**

REVIEW CRITERIA

Assessment Grades

A = Relevant tasks well performed, no important tasks left incomplete

B = Generally satisfactory and complete, only minor omissions and inadequacies

C = Can be regarded just satisfactory despite some omissions and/or inadequacies

D = Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions and/or inadequacies.

E = Not satisfactory, revealing significant omissions or inadequacies.

F = Very unsatisfactory, important task(s) poorly done or not attempted.

NA = Not applicable in the context of the ES or the project.

To Note

* Overall Review Grade should reflect the lowest score attributed to any of the review criteria and justification should be detailed in the review summary.

Review Grade*: C **Regulation 19 Request: N**

Review Summary:

The proposed development is for the demolition of existing library and training buildings and the construction and operation of a recycling and energy recovery facility (RERF).

The applicant submitted a scoping report to Hertfordshire County Council (HCC) in September 2010, and HCC issued a formal Scoping Opinion in November 2010. The applicant chose to submit a second Scoping Report in July 2011 which contained further details of the proposed development; a Scoping Opinion was issued by HCC on 12 October 2011.

The application was submitted to HCC on 15 November 2011. The ES comprised a Non-Technical Summary, Main Text and Technical Appendices. A Flood Risk Assessment and Transport Assessment were submitted as part of the application but did not form part of the ES.

A Regulation 22 request was made by HCC on 10 April 2012 requesting information on (in brief):

- EIA methodology
- Project description and construction programme
- Transport and movement
- Noise and vibration
- Landscape and visual
- Air quality
- Ecology and nature conservation
- Alternative site assessment

Veolia provided further information response to this request in May 2012.

The Committee Report (25 October 2012) recommended that the Head of Spatial and Land Use Planning grant planning permission for this proposal subject to it being referred to the Secretary of State and he not calling it in. However, the Secretary of State called-in the proposal on 28 January 2013, in view of the proposed development concerning matters that give rise to substantial cross boundary or national controversy. The matters he particularly wishes to be informed about are:

- consistency of the application with the development plan for the area
- its conformity with policies contained in the PPS 10: Planning for sustainable waste management and the NPPF, and
- the impact on a designated heritage asset

Section One: General Criteria

Review Criteria	Grade
1.1 Description of the development	
1.1(a) A description of the physical characteristics of the whole development including the site, size, design and use	C
Comments	
The proposed development is described in Chapter 4 of the ES. Information is provided on the dimensions of the 'dome' and the components of the development that it will house; the internal structure is detailed within section 4.3.2, and shown on Drawings No. 2, No.3, No.4, No.20 and No.21. Ancillary development (site roads, weighbridges, substation and transformer, parking, fencing and security and lighting) is detailed in Section 4.4. A landscape proposals plan is provided in Drawing No.LA 14. It is unclear from Chapter 4 of the ES what works will be undertaken in the northern part of the site along Traveller Lane, although it is assumed to be included for access purposes.	
1.1(b) A description of the land-use requirements during the construction phase including the anticipated duration	B
Comments	
The application site is detailed in Chapter 3 of the ES and is 12.62ha in size (section 3.2). A description of the land-use requirements for the construction period is not explicitly stated within the ES and has to be assumed from the red line boundary provided in Figures 3.1 and 3.2 of the ES. A construction programme is detailed in section 4.18 of the ES; construction is assumed to commence in 2013 and would take approximately 32 months.	
1.1(c) A description of the land-use requirements during the operational phase including consequential development	A
Comments	
The Application Site occupies 12.62ha of land (section 3.2 of the ES) as shown in Figures 3.1 and 3.2 of the ES. The ES indicates that there is the potential for the temporary relocation of Southfield School during the construction phase of the proposed development. However, assessments have been undertaken on a worst case basis, assuming the school is still present (e.g. for the noise assessment). We understand from third party correspondence that HCC granted planning permission for the temporary relocation of Southfield School on the playing field of Howe Dell School in February 2012 and that the site was screened as non-EIA development. No significant omissions or discrepancies are obvious.	
1.1(d) A description of the main characteristics of the production processes, for instance, nature and quantity of materials used	B

Comments The processes to be undertaken within the operational recycling and energy recovery facility are detailed within section 4.7 of the ES. The quantities and types of waste anticipated to be processed and stored within the facility is detailed in Chapter 4 of the ES. Processes have been shown in flow diagrams in Figures 4.1, 4.2 and 4.3. The water requirements for the facility are identified on Figure 4.4 of the ES, however quantities have not been provided.	
1.1(e) An estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc) resulting from the operation of the proposed development	A
Comments The relevant information is provided in the following ES chapters: • Chapter 7 - Noise and vibration • Chapter 8 - Landscape and Visual • Chapter 9 - Air quality • Chapter 11 - Hydrology • Chapter 12 - Geotechnical The Regulation 22 further information provides further information on vehicular movements, operational noise, night time lighting and emissions.	
1.1(f) Overall grade for section 1.1	C
1.2 Alternatives	
1.2(a) An outline of the main alternatives (site selection; reorientation; alterations to process/servicing; etc) studied by the applicant or appellant	A
Comments Chapter 5 of the ES details the alternatives that were considered by the applicant. This has included an assessment of alternative sites (section 5.3), alternative technologies (section 5.4) and alternative designs (section 5.4). Further details are contained within Appendix 5.1.	
1.2(b) The main reasons for the choice made, taking into account the environmental effects	A
Comments Chapter 5 of the ES identifies the environmental effects of alternative sites that were taken into consideration (section 5.3.2).	
1.2(c) Overall grade for section 1.2	A

Section Two: Issue Specific Criteria

Review Criteria	**Grade**
2.1 Prediction of Impacts	
2.1(a) The data required to identify and assess the *main effects* which the development is *likely* to have on the environment and whether any effects arise as a result of consequential development	C
Comments	
The ES identifies the environmental baseline from site specific surveys and using data held by other organisations. Each technical chapter identifies the likely potential impacts that could result from the proposed development. Assessments have been undertaken with reference to national planning policy framework, topic specific guidance and best practice, professional judgement and modelling (e.g. for Transport and Access). The ES makes some references to consultation with relevant bodies to agree the scope and findings of assessments. For example consultation was undertaken with the Environment Agency (EA), Natural England (NE), NHS and HCC for air quality, and with the Highways agency and HCC for transport. However, it would be expected that consultation would be undertaken with NE for ecology and the EA for hydrology, geology and land contamination and explicitly referred to within the ES. Although reference is made to English Heritage (EH) guidance document, there is no evidence of consultation with EH for archaeology and cultural heritage within the ES, although HCC did comment on assessment methodology in the Scoping Opinion.	
2.1(b) A description of the aspects of the environment likely to be *significantly affected* by the development including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors	C
Comments	
The Application Site and the surrounding area is described in Chapter 3 of the ES, which contains baseline environmental details on the site including current land use, access, topography and landscape character, surface water features and groundwater and settlements and human receptors. Each technical chapter also contains a description of the baseline environment and identifies the potential likely significant effects of the proposed development on relevant features. Baseline conditions have been established through desk top studies and site visits. All data appears to be relevant and up to date. The ES does not refer to future baselines scenarios (i.e. the start of construction). The study areas for technical assessment have been explicitly stated in some of the technical chapters, and where not stated can generally be inferred from the figures provided.	
2.1(c) Overall grade for section 2.1	C

2.2 Evaluation of Impacts	
2.2(a) Describes the *significance* of the direct effects; and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development	C
Comments	
The technical chapters describe the significance of effects and the majority of chapters contain a summary table within the ES Main Text. Relevant guidance and best practice is referred to throughout the ES. The potential for cumulative impacts has not been considered within each of the technical chapters, but has been considered in Chapter 16. The cumulative impact assessment (CIA) is high level and states that there are no proposed developments in close enough proximity to lead to significant cumulative impacts. Information has also been provided within the Regulation 22 further information document. The twin 33kV grid connection cable which will form a separate application. The cable route is approximately 2km long and is shown on Figure 4.5. Two potential route options and potential resulting impacts have been considered at a high level within the following ES chapters: • Chapter 8: Landscape and Visual • Chapter 10: Ecology and Nature Conservation • Chapter 14: Archaeology and Cultural Heritage	
2.2(b) A description of the *likely significant effects* of the development on the *environment resulting from the existence* of the development	B
Comments	
The technical chapters describe the environmental impacts that could potentially occur during operation of the proposed development. Chapter 17: Conclusions provides an overview of potential impacts.	
2.2(c) A description of *the likely significant effects* of the development on the environment resulting from the use of natural resources	B
Comments	
The Application Site is 12.62ha; 5.27ha of which is extensively developed, and 7.35 hectares of which is undeveloped and has been used as grazing areas for horses and for use as a broadleaved woodland plantation, as part of HCC Rural Estates' Watling Chase Community Forest project. The ES has assessed the potential impacts of the proposed development on natural resources including ecological, landscape and visual, and water resources. The ES does not provide detailed information on the type and use of natural resources during construction (e.g. types of building material) or operation (i.e. gas, electrical power) of the proposed development.	
2.2(d) A description of the *likely significant effects* of the development on the environment resulting from the emission of pollutants, the creation of nuisances and the elimination of waste	C
Comments	

Relevant information is provided in the following ES chapters: • Chapter 6 – Transport and Movement • Chapter 7 - Noise and vibration • Chapter 9 - Air quality (including odour) • Chapter 11 – Hydrology and Hydrogeology • Chapter 15 – Land Contamination There has not been a specific assessment on the elimination of waste, however the transport assessment acknowledges the need to store, handle and remove bottom ash from the operational site in sheeted vehicles.	
2.2(e) A description by the applicant or appellant of the forecasting methods used to assess the effects on the environment	A
Comments	
Chapter 2 of the ES Main Text details the general approach to the EIA methodology and contains references to good practice guidance used. The chapter provides an overview of how significance will be determined and employs a significance matrix approach. In addition, each technical chapter contains a section detailing the methodology and reference is made to the relevant guidance and established standards. It is acknowledged that for some topics there is not a standard approach to assessment, therefore professional judgment has been employed. No significant omissions or discrepancies are obvious.	
2.2(f) Overall grade for section 2.2	C
2.3 Mitigation	
2.3(a) A description of the measures envisaged to prevent, reduce and where possible offset any *significant adverse effects* on the environment	A
Comments	
Environmental controls (including Environmental Permit, odour and dust suppression; disposal of flue gas treatment residues; vermin control; and noise mitigation) are detailed in section 4.16 of the ES. Each topic chapter describes the mitigation measures and summary tables are provided in Chapter 17 of the ES Main Text. The tables include: • measures in the submitted design or to be incorporated through detailed design • measures through controls on construction procedures, and • measures through controls on operation procedures. The tables identify the measures that the applicant anticipates would need to be secured through planning conditions.	
2.3(b) Explains the extent to which mitigation methods will be effective	A

Comments The ES discusses the residual effects following the implementation of mitigation measures. No significant omissions or discrepancies are obvious.	
2.3(c) Overall grade for section 2.3	A

Section Three: Presentation of Results

Review Criteria	**Grade**
3.1 Non-technical summary	
3.1(a) A non-technical summary of the information presented under Schedule 4 Part 2 (5) *and* Schedule 4 Part 1 (1-5), if relevant	C
Comments	
A Non Technical Summary (NTS) of the ES has been provided and summarises the proposed development and the application site, alternatives and of the findings of the technical assessments. The NTS provides an extremely high level overview of the methodology used for each technical chapter, however does not make any references to significance. The NTS discusses the findings of the EIA and proposed mitigation at a very high level. It is difficult to determine the location of the site with the figure provided in the NTS – a context map would help to easily identify the land. The NTS discusses the potential for cumulative impacts however does not identify the projects which have been considered in the assessment.	
3.1(b) Overall grade for section 3.1	C
3.2 Organisation and presentation of information	
3.2(a) Has the applicant or appellant indicated any difficulties (technical deficiencies or lack of know-how) encountered in compiling the required information and the means used to deal with them	B
Comments	
The ES has not specifically identified any difficulties encountered; however assumptions made in the assessments are referred to throughout. The Regulation 22 further information listed the main identified limitations for: • Chapter 6: Transport and Movement • Chapter 7: Noise and Vibration • Chapter 10: Ecology and Nature Conservation • Chapter 12: Geotechnical (Land Stability)	
3.2(b) Does the ES give appropriate prominence to both positive and negative effects relative to their importance	A
Comments	
The ES describes both positive and negative effects.	
3.2(c) Overall grade for section 3.2	B

Section Four: Collation Table

Criterion	Overall Grade
Description of the development	C
Alternatives	A
Prediction of impacts	C
Evaluation of impacts	C
Mitigation	A
Non-Technical Summary	C
Organisation and Presentation of Information	B
Overall Grade (A-F):	C