Whealdream Holiday and Leisure

Waste Recovery Plan

20th June 2025

Notice

This report was produced by Land & Mineral Management for Whealdream Holidays and Leisure to provide a Waste Recovery Plan in relation to the proposed Construction of a Range and associated development at Whealdream Holidays and Leisure.

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1	16/04/2025	OL	First public version
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Drawings

Reference	Title
901.01 Rev A	Existing Site Plan
901.17	Final Masterplan
901.03 Rev A	Cross Section Plan

Appendices

Appendix A	Decision Notice ref: PA24/03864
Appendix B	Design & Access Statement
Appendix C	Financial Viability Assessment spreadsheet
Appendix D	Independent Assessment of FVA
Appendix E	Flood Risk Assessment & Drainage Strategy

1 Introduction

1.1 Whealdream is an established and successful family-run holiday destination complete with lodges and self-catering accommodation; a small 9-hole golf course; a Football/RugbyGolf course; and a highly rated restaurant – all located close to the picturesque village of Porthleven.

1.2 To enable the business to grow and develop further, the site needs to renovate and expand these offerings.

1.3 The current 9-hole pitch and putt course is basic in nature with rudimentary greens and tees laid out over steeply sloping land. The course is struggling to compete in the surrounding market and because of the severity of the terrain, it does not tap into the key markets of the younger and older golfer who find walking the course too tiring.

1.4 Following research, the owners have identified three golfing pastimes that would be both attractive to a range of customers whether they are enthusiastic golfers or just looking to have fun with friends and family. These pastimes are 'footgolf' 'rugby golf' and a driving range.

1.5 Therefore, Cornwall Council have granted planning permission ref: PA24/03864, dated 17/12/2024, for "*Construction of a golf range and associated covered bays building with cafe, together with a new 18 hole footgolf / rugbygolf course, new maintenance shed and water storage lagoon and extensive native planting scheme. Ground modelling to be undertaken using imported inert materials*" at Whealdream Holidays and Leisure, Wendron, Helston, TR13 0LR[1]. The Decision Notice is attached in Appendix A.

1.6 The proposed development is strongly supported by the local community, with the planning application receiving 40 public representations supporting the proposals.

1.7 The proposals include:

- The construction of a golf driving range and associated covered bays building and café;
- The construction of a new 18-hole Footgolf/Rugbygolf course;
- The construction of a water storage lagoon for irrigation;

[1] https://planning.cornwall.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=SDJ6ZRFGKIC00

- The construction of a new short game area and putting green;
- The construction of a new maintenance shed;
- The construction of a new car park and access road; and
- An extensive planting scheme.

1.8 The existing site, shown on plan ref: 901.01 Rev A, has a plateau in the eastern corner, sloping gently down to the southwest and more steeply to the northwest. There is little undulation or features of interest.

1.9 To reduce the severity of the steeper slopes along the northwestern side of the site; to create more a complex and interesting landform required for a higher-end golf courses; and to optimise drainage falls across the play-areas, the site must be reprofiled.

1.10 The proposed landform (and development) is shown in Final Masterplan ref: 901.17, with an excerpt in Figure 1 below. The extent of reprofiling can also be seen in Cross Sections Plan ref: 901.03 Rev A.

Figure 1 - Excerpt from Final Masterplan ref: 901.17 to show the approved development.

1.11 Volumetric calculations and a cut/fill analysis, as set out in section 10 of the approved Design & Access Statement that accompanied the planning application (Appendix B), have determined that a volume of approximately 102,000m^3 of material is required to achieve the approved landform.

1.12 A bespoke Environmental Permit shall therefore be sought to facilitate the importation and deposit of this material. This document forms a Waste Recovery Plan, prepared in accordance with EA Guidance Note: Waste recovery plans and deposit for recovery permits[2] dated 29/06/2023.

[2] https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits

2 Waste Recovery Assessment

Financial Benefits of Using Non-Waste

2.1 As set out in the accompanying Financial Viability Assessment (FVA, Appendix C), which has been compiled and calculated by Darrin Colfer (FC), a qualified CIMA Accountant.

2.2 The FVA demonstrates that the proposed development scheme would provide a viable financial gain should non-waste materials from a local quarry. This is summarised below:

Scheme Costs

- Supply and delivery of quarry fill as per Goonvean Aggregates Ltd quote dated 17/04/2024 presented in Appendix 15 of the FVA (invoice for similar job). [redacted]

- Strip topsoil & replace topsoil, install drainage works, planting, carpark etc. as per the quotation from construct paths and parking areas as per the quotation from 1st Golf Construction Ltd presented in Appendix 11 of the FVA. [redacted]

- Maintenance Shed supply, delivery and installation as per Cleveland Sitesafe quote dated 22/10/2024 in Appendix 12 of the FVA. [redacted]

- Range bay construction as per ProRange Design quote (undated) in Appendix 13 of the FVA. [redacted]

- Plant supply (inc fuel and labour) for grading work as per MJ Church and Synergy Hire invoices for similar works in Appendix 10 of the FVA. [redacted]

Design & Planning Cost [redacted]

Scheme Cost Excluding Finance Charges [redacted]

Financial Charges

2.3 Taking a worst-case scenario of having to borrow money from a bank to construct the development, from day one until the development was fully operational and open for business a financing cost would be incurred on the sum borrowed, this has been calculated in the sum of [redacted] as summarised below:

Sum Borrowed – as Scheme Cost Total	[redacted]
Loan Period:	[redacted]
Interest Rate	[redacted]
Finance Charges	[redacted]
Total Scheme Costs	[redacted]

Scheme Income

2.4 The development will provide range of income sources including golf/range, food and beverages, shops retails and football/rugby golf.

2.5 The anticipated income from these various sources is set out in detail in the "Net Scheme Income" tab of the FVA and the various assumptions and supporting information set out in appendices 1-9 of the FVA. It is anticipated that the total annual turnover generated through the scheme will be [redacted]

Annual Running Costs

2.6 The development will include staffing, provision of stock and materials (such as balls). These will have an annual cost (including pension and National Insurance contributions) o[redacted]

Scheme Financial Viability - Financial Appraisal

2.7 With an estimated gross annual income o[redacted] and estimated annual running costs of [redacted], the anticipated net annual income (pre-tax) from the scheme [redacted]

2.8 Please note all figures used in the Financial Viability Appraisal for both costs and income are all exclusive of VAT. The business for the fishery is run through Whealdream Holidays and Leisure which is registered for VAT (VAT No: GB481967542) and therefore will reclaim any VAT charges incurred on construction of the lake. Taking VAT out of the equation makes the Appraisal more straight forward.

2.9 The FVA has also been independently reviewed by Mark Smith of Smith Leisure – specialists in UK golf property and business matters. Mark's findings, presented in Appendix D, can be summarised that, whilst in his opinion the presented operational costs are lower than one might expect and the income is higher than he might expect, even applying more conservative figures the scheme and project remain financially viable.

2.10 Based upon the above, the proposed development can therefore be considered to pass the Substitution Test as there would be a meaningful financial gain and the project would go ahead if non-wastes were to be used.

3 Additional Information

Purpose of the Work

3.1 As set out above, the proposed development scheme is required to enable the growth of an established local business by improving the range and quality of leisure activities available to both the local community and visiting guests.

3.2 Use of wastes, rather than importation of non-wastes from a local quarry, is the most environmentally sustainable solution for the proposed works as it will avoid the need to precious and finite natural resources and enable the recovery of waste, which would otherwise be landfilled, to move up the waste hierarchy (to recovery from disposal).

Quantity of Waste and Types to be used

3.3 All on-site materials will be retained during construction and used for the creation of the landform to reduce the need to import materials to a minimum. As set out above and in the planning permission's Design & Access Statement, volumetric calculations have shown a volume of approximately 102,000m^3 of material is required to create the landform approved by the planning permission. This equates to approximately 163,200 tonnes of inert waste assuming a bulk density of 1.6 tonnes/m^3.

3.4 Only wholly inert wastes, suitable for this development, which arise from non-contaminated green field/construction/development sites in the local area will be used.

3.5 Specific waste codes to be used would be set out in any forthcoming permit but those intended to be used would be limited to those identified as being acceptable for use as a structural or general fill as set out in current EA Guidance Note: Check if your waste is suitable for deposit for recovery[3] (dated 29/06/2023). Intended EWC codes are set out in Table 1 below:

[3] https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/check-if-your-waste-is-suitable-for-deposit-for-recovery

Table 1 - Proposed EWC Codes

EWC Code	Description
01	**WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS**
01 01	**wastes from mineral excavation**
01 01 02	Wastes from non-metalliferous excavation
01 04	wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	Waste gravel and crushed rocks
01 04 09	Waste sand and clays
10	**WASTES FROM THERMAL PROCESSES**
10 12	wastes from manufacture of ceramic goods, bricks, tiles and construction products
10 12 08	Waste ceramics bricks tiles and construction products (after thermal processing)
10 13 14	Waste concrete and concrete sludge
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 01	concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, brick, tiles and ceramics other than those mentioned in 17 01 06
17 05	soil (including excavated soil from contaminated sites), stones and dredging spoil
17 05 04	Soil and stones other than those mentioned in 17 05 03
19	**WASTE FROM WASTE MANAGEMENT FACILITIES**
19 12	wastes from the mechanical treatment of waste
19 12 05	Glass – **granular form only**

19 12 09	Minerals (such as sand and stones) from the treatment of waste aggregates that are otherwise naturally occurring minerals – excluding fines from treatment of non-haz wastes and plasterboard
19 12 12	Crushed bricks, tiles, concrete and ceramics, including mixture of materials excluding fines from treatment of non-haz wastes, metals and plasterboard
19 13	wastes from soil and groundwater remediation
19 13 02	Solid wastes from soil remediation other than those containing dangerous substances
20	**MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS**
20 02	garden and park wastes (including cemetery waste)
20 02 02	Soils and stones

Quality Standards

3.6 It is not proposed to import and utilise any spoils or other materials derived from contaminated or potentially contaminated sites. The waste sources are likely to arise predominately from the excavation/ re – landscaping arisings, generated by groundworks activities associated with road and building construction.

3.7 The acceptance of inert waste will be subject to a Waste Acceptance Procedure which will accord with up-to-date Environment Agency Guidance. This will ensure that only suitable inert materials are accepted.

3.8 The proposed landform has been designed by Weller Designs Ltd, professional golf course architects who specialise in the design and development of high-end golf courses. Bruce Weller, designer, is a Member and former Executive Director of the European Institute of Golf Course Architects (EIGCA).

3.9 The Flood Risk Assessment & Design Strategy (Appendix D) approved under planning demonstrates that the site is wholly within Flood Zone 1 and the risk of flooding elsewhere will not be increased as a result of the development. The proposals do not increase the site's run-off rate above the Greenfield Run-off Rate and flood storage capacity is provide through a water storage lagoon and drainage swale. This lagoon will also serve as a source of water for any irrigation required, aiding the development in being self-sufficient.

3.10 In-situ soils shall be stripped, handled, stored and replaced in accordance with the Institute of Quarrying's Good Practice Guide for Handling Soils in Mineral Workings[4] which is appropriate for earthmoving and construction projects.

Conclusions

3.11 The proposed recovery of waste, to enable landscaping approved under planning permission ref: PA24/03864, would demonstrably provide a benefit. The design is to a high-standard of quality and the waste types to be used are suitable for the proposed use and would not result in any negative environmental impacts. A meaningful financial gain would still be made if non-wastes were used, and the proposals would still be undertaken. The proposals therefore pass the substitution test and the proposals can be deemed as recovery.

[4] https://www.quarrying.org/soils-guidance