

# Chelveston-cum-Caldecott Parish Council

## NORTHAMPTONSHIRE

Clerk to the Council: - Mr M.H.Hunter

Ashbury  
Caldecott  
Wellingborough  
Northants  
NN9 6AR

Ref: O/2007/115/MHH

Tel: (01933) 626039  
Email: Clerk@chelveston.org.uk  
Web: www.chelveston.org.uk

07/12/2007

---

Mr. Mark Chant  
Minerals & Waste Planning Team  
Northamptonshire County Council  
County Hall  
Northampton  
NN1 1AN

### Northamptonshire MWDF Preferred Options consultation – Site WA8 (Chelveston).

Dear Mark Chant,

The Council has considered the above potential waste site, having taken advice from various sources, including the NCC MWDF presentation held in Raunds on Thursday 29<sup>th</sup> November. In turn, the Council has consulted with the electorate of the parish at a parish meeting held on Monday 19<sup>th</sup> November 2007.

Having looked at the evidence presented, the view of the Council is that the site WA8 should not go forward to the next stage (Submission) for the following reasons.

#### 1. Contrary to National and European Policy.

The site is located in a rural area on the county border with Bedfordshire and thus well away from the primary sources of the waste, namely Northampton, Wellingborough, Kettering and Corby on the “urban spine”. Both EU (directive 2006/12/EC) and UK (*Waste Strategy 2007* and PPS10 - *Planning for Sustainable Waste Management*) policy is for waste centres to be located in close proximity to the sources, minimising road transport.

Of the 16 preferred sites, many of the other MWDF sites are better geographically placed to handle waste near to the source (i.e. are located on the urban spine). The selection of this site over these others would therefore be contrary to the proximity policy and MWDF Core Strategy DPD CS12.

The site was designated as Open Countryside in the ENC LDF village development confines survey of 2002. The ENC LDF *Three Towns Plan: Preferred Options Report* (September 2006) identifies the land as naturalised and Greenfield. Development of this site in preference to the Brownfield sites would therefore be contrary to PPS 10 para 21 (ii) and MWDF Core Strategy DPD CS12.

#### 2. Contrary to Regional Policy.

The emerging draft East Midlands Regional Plan (due to replace the existing RSS8 in 2008) at 3.3.62 Regional Priorities for Waste Reduction and Waste Management, Southern sub-area states *A centralised pattern of fewer larger facilities based around these urban\* areas is therefore proposed.*

\* Northampton, Wellingborough, Kettering, Corby.

# Chelveston-cum-Caldecott Parish Council

## NORTHAMPTONSHIRE

Policy 37 – Regional Policies for Waste management sets out the criteria

- *proximity to existing or major new or planned development;*
- *good transport communications, with preference given to rail and water;*
- *compatible land uses such as active mineral working sites, previous or existing industrial land, contaminated or derelict land adjoining sewage treatment works;*
- *locally based environmental and amenity criteria.*

The East Midlands Freight Strategy (July 2005) and the East Midlands Regional Waste Strategy (January 2006) both promote *opportunities for carriage of waste by more sustainable modes, in particular through promotion of rail and water transfer terminals.*

This site fails to meet any of the above, in that it is not within the urban spine, it does not have good transport communications (or any rail or water transfer stations), is located on a Greenfield site and will detrimentally impact on the local environment and amenity.

### **3. Contrary to Local Policy.**

The emerging ENC LDF *The Three Towns Plan*, due to be submitted in January 2008, identifies the land as naturalised and Greenfield. It also considered the option of development of the site for employment, but rejected it as *“This was not considered appropriate due to the unsustainable location of the site, the visual impact of development of this nature in the open countryside and the wider environmental effects on the quality of life for local residents”*.

The MWDF Spatial Development Strategy for Waste Management is that facilities should be focused on the urban spine. Where facilities are more appropriate to rural locations, these should be *linked to existing rural employment uses.*

Accordingly, since there are no existing rural employment uses on this site and nor does the emerging LDF consider it appropriate that there will be, the selection of this site is contrary to the local LDF policy, the MWDF Spatial Development Strategy for Waste Management, MWDF Core Strategy DPD CS11 & CS12 and MWDF Waste Location DPD W7.

### **4. Transport infrastructure.**

The nearest A roads would be either the A6 or A45 and then via B, C or unclassified roads to the site. The recent technical survey by NCC of these minor roads found only 50 vehicle movements an hour peak rate, with no HGV movements at the time of survey and that the approach roads to the site were currently unsuitable (less than 5.5m width in places) for sustained HGV traffic and would require improvement - *Major improvements to the junction and undertake reactive role to sustain existing infrastructure to highway network. Haunching works undertaken prior to commencement of works on site and This proposed access point will require substantial works to form aslly [sic] kerb and reconstruct to current standards.*

However, in the technical summary, this was down-played to *It is anticipated that minor improvements are required as a result of the increase in HGV movements. These improvements may include improvements to the junction, and undertaking of reactive role to sustain existing infrastructure to highway network. Haunching work will need to be undertaken prior to work starting at the site.*

# Chelveston-cum-Caldecott Parish Council

## NORTHAMPTONSHIRE

The developer has indicated the site has a potential for 150,000 tonnes annually, which if all the waste was transported in 44 tonne articulated HGVs with a 30 tonne payload, this would require 10,000 HGV movements to and from the site annually, ignoring any service or plant maintenance vehicles, compared to zero at the time of the survey.

As previously mentioned, there are no rail or water freight transfer stations on this site that could support the modal shift away from road freight transportation.

All the other Preferred Options sites (except WA15 & WA16) are located near to main roads.

The site approaches would therefore suffer a level of HGV traffic beyond the capability of the present infrastructure, contrary to PPS10 para 21 (identifying suitable sites and areas), MWDF Core Strategy DPD CS19 and MWDF Waste Location DPD W4.

### 5. Technical Assessment.

The **Site Assessment Summary** indicates the *overall level of environmental risk associated with potential development of the site is moderate. This is largely due to the fact that the site is relatively isolated from sensitive environmental and residential receptors (only isolated rural residences located nearby) and the nature of the activity (Anaerobic Digestion) and it is generally considered that with implementation of appropriate mitigation techniques, environmental risk can be largely negated.*

This assessment concentrates solely on a 5 ha (estimated, but not stated, at 45,000 tonnes annually) Anaerobic Digestion plant. However, you have since confirmed that the developer supplied the same site information to NCC as BCC, namely for a capability of 150,000 tonnes annually through various waste processes. The technical assessment for the site is therefore unsound in the context of the larger capability, since the full impact has not been assessed.

The **Summary of Risk Evaluation and Mitigation Measures** states the risk after mitigation is *Negligible – Low level residual risk of environmental nuisance, land use conflict with sensitive receptors (fugitive dust, vehicle emission, noise and vibration, odour).* But the summary is based on inaccurate or incomplete assessments. This may be due to less time being available compared to those sites that came through the Issues and Options stage.

For example, the **Site description** states *Development will be visible from the Right of Way that crosses the site* and **Environmental constraints** states *Bridleway BWY18 / MM18 is located on the site.* This does not mention that there are actually 4 miles of recently reopened public Rights of Way on the site;

- NCC – footpaths MM16 & MM19 and bridleways MM14, MM17 & MM18.
- BCC – footpaths S7, Y17 & Y20 and bridleways BW39, BW40 & Y18.

The visual sensitivity of the Right of Way users, by the NCC criteria (Table 14), will be high.

**Landscape condition** states *the landscape character of the site is described as moderate with degradation of landscape values associated with the sites use as a former airbase.* Again this is misleading, as the phrase “former airbase” leads anyone without local knowledge to think of runways and hangars, whereas the USAF ceased flying operations in 1962 and the buildings and runways have long since been removed.

# Chelveston-cum-Caldecott Parish Council

## NORTHAMPTONSHIRE

**Landscape character sensitivity to proposed use** states *Location on plateau allows for some distant views from residential areas, however the large scale of the site and proposal to locate development centrally will minimise visual sensitivity* and **Opportunities for mitigation** states *The proposed location of the development in the middle of a very large would also assist in mitigating potential landscape impacts* As above, this assessment is focused on one 5 ha (est. 45,000 tonnes) Anaerobic Digestion plant, rather than the developer's 150,000 tonnes proposed capability through various methods, which will be spread over a much larger area of the site.

There is no mention that the BCC MWDF Issues & Options survey states that *"Part or all of this site is Grade 2, best and most versatile agricultural land"* which, by the NCC criteria (table 8), would be a major rather than a moderate consequence.

Table 6 (identification of criterion requiring detailed assessment of preferred sites) has only one tick (L/scape character) and one \* (historic enviro) in the Environmental section. Air emissions and odours are not considered necessary to assess in detail. Even if the application had only been for an Anaerobic Digestion plant, the emission of the obnoxious sulphide related fumes (which are particularly nauseous) would warrant a detailed assessment in itself, even more so with the other processes put forward for the site.

Again in table 6, there is no tick in the Social section. The amenity value from the 4 miles of Rights of Way (mentioned above) has been down-played.

The technical assessment for the site is therefore unsound in the context of the larger capability, since the full impact has not been assessed.

### 6. Environment.

The site would negatively impact on the surrounding natural environment as;

- a. The site is on a plateau and hence any tall structures would be visible for miles, impacting on the surrounding rural area.
- b. The site is on the watershed between the River Ouse and River Nene; with the potential to contaminate both if adequate precautions were not taken and maintained.
- c. The site is only 800m from the Yelden Meadows SSSI (wetland site).

NB. Distances are taken from that part of the site boundaries on the NCC side of the border. Distances on the BCC side are less.

This is contrary to PPS10 Annex E (location criteria) parts a, c & d.

### 7. Heritage.

The site is on a plateau and hence it is likely to impact negatively on the following recognised heritage (built environment) sites:

- a. Yelden Church (Grade 1 listed) – only 975m away.
- b. Yelden motte & bailey castle (C12 scheduled ancient monument) - only 1,050m away.
- c. Shelton Church (Grade 1 listed) – only 2,125m away.
- d. Hargrave Church (Grade 2\* listed) – only 2,125m away.
- e. Chelveston Church (Grade 2\* listed) - only 1,250m away.
- f. Newton Bromswold Church (Grade 1 listed) – only 1,125m away.

NB. Distances are taken from that part of the site boundaries on the NCC side of the border. Distances on the BCC side to some of these locations are less.

This is contrary to PPS10 Annex E (location criteria) parts c & e.

# Chelveston-cum-Caldecott Parish Council

## NORTHAMPTONSHIRE

### **8. Proximity to sensitive receptors (e.g. smell, noise).**

The site is located close to the surrounding rural villages of

Yelden - 900m (to nearest dwelling)

Shelton -1,950m (to nearest dwelling)

Hargrave -1,950m (to nearest dwelling)

Chelveston - 880m (to nearest dwelling)

Caldecott -780m (to nearest dwelling)

USAF Housing Annex at Chelveston Base Crescent - 25m (to nearest dwelling)

Newton Bromswold -1,500m (to nearest dwelling).

Plus the isolated dwellings and farms such as High Barn (750m), Manor Farm (750m), Airfield Farm (750m) and Lodge Farm (1,125m).

NB. Distances are taken from that part of the site boundaries on the NCC side of the border. Distances on the BCC side to some of these locations are less.

The types of recycling plant being proposed require 24/7 operation. The most probable negative impacts on the receptors will be visual (structures and light pollution), noise, smell and vermin. By way of example, the existing Anaerobic Digestion plant at Twinwoods is causing an odour nuisance at Clapham, which is further from the Twinwoods site than the villages (above) are from this site. There will be secondary effects from the increased HGV traffic near some receptors.

This is contrary to PPS10 Annex E (location criteria) parts c, f, g, h, i, j & k.

### **9. Cumulative effect.**

The site is directly adjacent to site WSD33 on the BCC MWDF Issues and Options consultation. As the developer has provided the same information to both County Councils, this is also a potential 150,000 tonnes annually site.

The site is only 3 miles from the recent NCC determined application for a 45,000 tonnes annually Anaerobic Digestion plant at Westwood, near the A6 on the county border (Grid Ref SP 9889 6323).

This application has been withdrawn at the time of writing due to failure of the developer to provide sufficient technical information, but Biogen (UK) Ltd have now written to the parishes to advise it is to be resubmitted following a public exhibition on the 10<sup>th</sup> December in Newton Bromswold.

Were all three sites permitted to develop to their maximum potential this would create a 345,000 tonnes annually tri-site within a 3 mile block straddling the county border, contrary to PPS10 para 21 (identifying suitable sites and areas).

# Chelveston-cum-Caldecott Parish Council

## NORTHAMPTONSHIRE

### Conclusion.

On the basis that this potential site is contrary to national, regional and local policy (including the MWDF Core Strategy DPD),

- being located far away from the waste sources compared to other potential sites,
- has an inadequate transport infrastructure,
- will negatively impact the natural and built environment,
- is proximate to sensitive receptors and
- could cumulatively create a 345,000 tonnes annually tri-site straddling the county border,

and that the technical assessment is inaccurate/incomplete in only considering a 5 ha Anaerobic Digestion plant, the Council requests of NCC that site WA8 (Chelveston) is not taken forward to the Submission stage as it is unsound since it fails test 6 (the allocation is not consistent with the proposed Core Strategy) and test 7 (the process so far is not based upon a robust and credible base).

If you require further information, please feel free to contact me.

Yours sincerely,

Mark H Hunter

Clerk to the Parish Council  
Chelveston-cum-Caldecott