



Hargrave Conservation Society

Chairman: JL Brotherton, Hargrave Hall, Church Road, Hargrave, Northamptonshire, NN9 6BE

Roy Romans
Team Leader, Minerals & Waste
County Hall
Cauldwell Street
Bedford
MK42 9AP

25 November 2007

Dear Mr Romans

Bedfordshire MWDF - Issues & Options consultation – Site WSD 33 - Chelveston former airfield

Hargrave Conservation Society was formed fourteen years ago and is recognised as a consultee body by East Northamptonshire Council and Bedford Borough Council when considering certain planning applications. The Society is focused upon the conservation of the environment and wildlife habitats of the village of Hargrave and the surrounding landscape.

Present use - the former airfield at Chelveston has been turned over to grazing for cattle and sheep for over thirty years. Except for a small single-storey former control building in the centre of the site and a metal Boxer mast, the airfield has been cleared of any other structures for many years. The total land area of the location is 758 acres. The site was purchased two years ago by Sykes Engineering from the MoD in a less than transparent transaction and has since been proposed for major development as a waste processing facility.

General unsuitability - we consider that this location is wholly unsuitable for the developments outlined by Sykes Engineering and/or its agents. We consider that the ad hoc proposing of land for waste processing by land owners is deeply flawed and lacks coherent strategy. The village of Hargrave is directly in the path of the prevailing winds from the west and southwest. The former airfield is located on a plateau that forms locally high ground and emissions from the site will settle at the lower levels in which Hargrave is situated. The location is highly visible for many miles around and any development would have a profound visual impact. The location, which is 98 per cent open grassland, is notable for its quietness, solitude

and complete absence of manmade developments and clutter. The former airfield is marked with a complex of footpaths and bridleways. The nearest major trunk road is the A6 at Rushden which is almost three miles distant.

Preliminary review – we have read your preliminary evaluation of the use of this site for the development of various waste processing and destruction activities and agree with many of the points that BCC have raised. In particular, we are pleased that you have recognised the intrinsic value of this location to the local landscape and its lack of a suitable local transport infrastructure to support the proposed activities. The Council have also recognised that the topography of the site is such that any development of this type would have an exaggerated visual impact on the landscape and nearby heritage buildings.

Emissions and odour - the fact that the location sits astride a plateau that forms the local high point will clearly increase the risk of unacceptable emissions settling in nearby villages at lower levels of which Hargrave is one. Anaerobic digestion processes are particularly known for emitting noxious sulphide related odours that drift considerable distances and settle in low points inside buildings. This causes health issues including nausea and depression caused by the constant interference and degrading of the local environment. Such odours from the Bedfordia AD plant near Clapham cause local concern and related health issues.

Visual impact - attempts at screening out buildings, chimneys, sheds etc with trees and shrubs would not be properly effective for at least twenty years and arguably longer. An idea of the huge visual impact can be gained by driving around the area and looking out for the Boxer communications mast that still exists on the site. This can be clearly seen for many miles and is particularly noticeable from any ridge or plateau for a radius of ten miles. The network of footpaths and bridleways on and adjacent to the site would be seriously degraded by the sight, noise and smell emanating from the processes proposed. The quality of the night sky, which has unusual clarity for this area, would be irreparably damaged by light pollution.

Noise - the former airfield has been silent for many years and has remained free of any manmade structures and human industrial activity. Background noise for much of the day is virtually nil, with the B645 being quiet outside of peak commuting hours. The ambience of the area would be seriously degraded by introducing alien industrial-type processes and associated traffic movements.

Amenity - the fact that the location is predominantly grassland used for grazing animals also provides a precious resource for a locality that has generally been turned over to intensive arable farming. The sight of sheep and cattle roaming free over large open areas of grassland is unique in this part of the country. The proposed urban sprawl that will eventually smother the Northamptonshire towns of Wellingborough, Kettering, Finedon, Irthlingborough, Rushden, Higham Ferrers and Burton Latimer will only be relieved by the Nene river valley, which itself is degraded by the A14 and A45 busy trunk roads and ribbon development of large tin sheds of

up to 500,000 sq ft at Wellingborough, Rushden, Raunds and Thrapston. The Chelveston former airfield is a haven of solitude and should be preserved for its own sake as the onslaught of new housing development creeps closer.

Traffic – a total of 150,000 tonnes per year represents a minimum of 12,000 artic traffic movements, in and out, at 25 tonnes per vehicle. This alone is 33 movements per day, which would probably at least double with ancillary traffic. The figure also assumes a deadweight calculation. Clearly more movements would be used if the vehicle cube was absorbed before it became overweight. The local road network surrounding the proposed site is completely inadequate to deal with the additional heavy freight movements. The B645 east of Tilbrook is prohibited to vehicles over 17 tonne GVW,

Cumulative effect – there is already a substantial waste processing and treatment site at Wymington and a wind turbine complex in sight at Burton Latimer. A planning application has been made to extend this installation. A waste treatment plant is located at Twinwoods at Clapham and a proposal has been made for an AD plant at Westwood south of Rushden. Incineration is carried out at Tilbrook just over the county boundary in Cambridgeshire. Together with the increasing placement of large storage sheds this represents an over-industrialisation of the area.

Employment – waste treatment and processing is primarily a mechanised operation and would provide very little if any real incremental employment for the county.

Planning policy – the use of this location for waste treatment and processing would run counter to various planning policies and guidance. The attached notes define areas of conflict, dealing particularly with PPS10 – Planning for Sustainable Waste Management, which is the most appropriate for this type of proposal.

The members of this Society consider that the proposal to include the Chelveston site as a preferred location for the treatment and processing of waste is unacceptable for the reasons given.

Yours sincerely

John L Brotherton

Chairman

Planning Policy Statement 10: Planning for Sustainable Waste Management

Key Planning Objectives

3. Point 4 - help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations;

Anaerobic digestion produces a noxious odour that drifts on the wind and settles at low points. Hargrave, Keyston and Covington are villages that are lower than the Chelveston site and directly in the path of the prevailing wind (west, SW and WSW). This odour can cause health both physical and mental health problems within affected households. The Chelveston site is not within or close to any major urban conurbations and any waste would have to travel a number of miles to the site along country roads.

3. Point 5 - reflect the concerns and interests of communities, the needs of waste collection authorities, waste disposal authorities and business, and encourage competitiveness;

The Chelveston site has been listed, but has not been subjected to any competitive comparisons. Surveys indicate that local people in nearby and affected villages are very much against the proposal.

3. Point 6 - protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission;

The Chelveston site is nominated as Greenfield by East Northamptonshire Council. The site has been turned over to grazing land for over 30 years. Grazing land is very rare in this part of the county and should be preserved as such. The site and surrounding area is notable for its lack of man-made features in the landscape. The heavy traffic, noise and light pollution that would be generated by the proposed development would be especially intrusive and damaging in such an area.

Decision Making Principles

4. Point 2 - waste management should be considered alongside other spatial planning concerns, such as transport, housing, economic growth, natural resources and regeneration, recognising the positive contribution that waste management can make to the development of sustainable communities, and should be integrated effectively with other strategies including municipal waste management strategies;

The Chelveston site has been listed solely because the owner and potential developer proposed it. The subsequent review has been reactive and the site has not been chosen as the result of any strategic review that took into account the source of the waste, inherent suitability or impact upon the surrounding landscape and communities.

Regional Special Strategy – Local Development Documents

Identifying Land for Waste Management Facilities

18. Point 3 - avoid unrealistic assumptions on the prospects, for the development of waste management facilities, or of particular sites or areas, having regard in particular to any ownership constraint that cannot be readily freed, other than through the use of compulsory purchase powers.

The sponsorship of the Chelveston site by the owner is mere opportunism. Its acceptance reflects the pressure on NCC to source (any) sites that may be offered rather than drawing up a template of required values for suitable sites and searching to match the required criteria. This constrained process is inherently flawed and automatically degrades any consideration of environmental impact and suitability for the immediate area. The process denies any priority consideration to the source and flows of waste for processing.

Identifying Suitable Sites & Areas

21.i. Point 2 - the physical and environmental constraints on development, including existing and proposed neighbouring land uses
21.i. Point 3 - the physical and environmental constraints on development, including existing and proposed neighbouring land uses

21.i. Point 4 - the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport.

21.ii. Point 1 - give priority to the re-use of previously-developed land, and redundant agricultural and forestry buildings and their curtilages.

The Chelveston site cannot properly be considered as “Previously developed land”. Airfield operations ceased over 30 years ago and even as an airfield just a small fraction of the land was ever “developed”. The land is now open grazing for sheep and cattle. It plays an important role in the general landscape of the area, which is mainly arable farming and has very little grassland and grazing animals. All neighbouring land uses are agricultural and the general area is notable for its lack of development and manmade features of any size in the landscape. The location stands on a plateau, which is a high point in the local area. Any development would have an adverse visual impact and emissions would blight local villages. The development of the Chelveston location for a high intensity waste operation would represent an incongruous blight on the local landscape and would extend the creeping industrialisation and development taking place in Higham Ferrers, Rushden, Irthlingborough, and Finedon etc. As such, the ambience of the local countryside would be irreparably damaged.

There is no local road or rail infrastructure to support any industrial type development at the Chelveston location. The nearest road is the limited B645, which passes through villages such as Chelveston, Hargrave, Tilbrook, and Kimbolton. Heavy good vehicles over 17 tonnes GVW are prohibited from using sections of the B645 except for direct deliveries.

Determining Planning Applications

Responsibilities

27. - **extract** - The planning system controls the development and use of land in the public interest and should focus on whether development is an acceptable use of the land, and the impacts of those uses on the development and use of land Local Environmental Impacts

For the reasons outlined above and taking into account the fact that the local area is remarkable for its quietness, openness, rural aspect, lack of light pollution and absence of any development, this proposed location is wholly unsuitable for the proposed use.

29. – extract - In considering planning applications for waste management facilities waste planning authorities should consider the likely impact on the local environment and on amenity

For the reasons already outlined, the impact of any such development at this location would be highly incongruous and would have an exaggerated visual impact. The local environment would be damaged by noise, odour and light pollution. In the latter case, the night sky when viewed to the south and east is unusually free from the light pollution that has destroyed viewing of the night sky from the west and north (an arc from south Rushden to east Finedon and Kettering etc.) Heavy vehicle movement is not a feature of the local roads west of Higham Ferrers, which is generally confined to the A45 and A14 trunk roads.

Planning Conditions

32. - it may be appropriate to use planning conditions to control other aspects of the development. For example, planning conditions could be used in respect of transport modes, the hours of operation where these may have an impact on neighbouring land use, landscaping, plant and buildings, the timescale of the operations, and impacts such as noise, vibrations, odour, and dust from certain phases of the development such as demolition and construction.

The proposed location is wholly unsuitable for development for the reasons mentioned above and planning conditions should not be relevant in this context. It should go without saying that any planning consent for a development such as that proposed, which causes known damage in terms of visual impact, noxious odours and potentially carcinogenic emissions, should require the utmost environmental and operational controls and the use of the most up to date and stringent operational controls.

Good Design

35 – extract - Planning authorities should ensure that new development makes sufficient provision for waste management and promote designs and layouts that secure the integration of waste management facilities without adverse impact on the street scene or, in less developed areas, the local landscape.

The characteristics of the local area are such that it would be quite impossible to mitigate the adverse impact of such a development on the local landscape.

Annex E

Locational Criteria

c. visual intrusion

Considerations will include (i) the setting of the proposed location and the potential for design-led solutions to produce acceptable development;

It would be impossible to design such a plant in a way that could eliminate its adverse impact upon the local landscape and neighbourhoods.

f. traffic and access

Considerations will include the suitability of the road network and the extent to which access would require reliance on local roads.

The local road network does not contain any major trunk roads and the traffic impact of such a development would be catastrophic for local villages and the immediate location.

h. odours

Considerations will include the proximity of sensitive receptors and the extent to which adverse odours can be controlled through the use of appropriate and well-maintained and managed equipment.

A review of the nearby anaerobic digestion site at Clapham in Bedfordshire shows quite clearly that the basic nature of this process releases noxious and invasive odours into the locality irrespective of the level of controls in the plant itself.

j. noise and vibration

Considerations will include the proximity of sensitive receptors. The operation of large waste management facilities in particular can produce noise both inside and outside buildings. Intermittent and sustained operating noise may be a problem if not kept to acceptable levels and particularly if night-time working is involved.

The location is notable for its complete lack of development and pollution. Monitoring indicates that it is unusually silent and free from light pollution. The impact of a 24-hour operation of the type envisaged would be exaggerated and would severely damage the ambience of the area and the environment of local people. The proposal represents a potential ruination of one of the very few quiet, undeveloped and wholly rural sites in Northamptonshire. Whilst these are the very qualities that put it at risk, NCC should resist the temptation to progress the proposal because it is in a relatively unpopulated area and recognise the benefits of retaining such countryside in its portfolio.

PPS 22

Methane is a by-product of anaerobic digestion and a source of energy. PPS22 considers waste to energy schemes. Locational and environmental issues are material considerations in the Key Principles of PPS22, and development proposals are required to demonstrate how any environmental and social impacts have been minimised through careful consideration of location, scale, and other matters. Regional strategies are required to take into account these same impacts, as are sub-regional targets. A plant on the Chelveston site would fall well short of the spirit of this planning guidance in terms of respect and care for the environment.

Companion Guide to PPS22

Page 120, para 26 – extract

“In general, waste treatment and disposal operations are characterised to a large extent by the high volume of materials entering and exiting the site. In order to minimise the adverse environmental effects of transporting waste, they should, wherever possible, be located close to the waste source. The optimum locations for most MSW and business waste plants are therefore likely to be in or very close to urban areas.”

This paragraph recognises the “adverse environmental effects of transporting waste”. The Chelveston location is not located close to its potential sources of waste, which would be far

better located centrally within the developed spine of Kettering, Wellingborough, Burton Latimer and Finedon.

Page 106, paras 40 & 41 – extract

“The most acceptable sites are likely to be beside existing industrial or wastewater treatment works or, in the case of digestion schemes using MSW, in close proximity to a landfill site or waste transfer station...Centralised anaerobic digester plants will draw traffic to their central location as feedstock is delivered and products are distributed. The impact of these transport movements can be minimised by carefully considering fuel supply logistics, thereby reducing the distances travelled between the feedstock, storage tanks, digester and local markets.”

The Chelveston site fails significantly to satisfy this criteria and a plant at this location would cause substantial pollution and environmental damage through the excessive travelling distances required by transport to and from the site.

Page 88, para 38 makes clear that similar principles apply to biomass and the need to site plants close to “the centre of gravity” of the proposed feedstock, with proximity to “main transport conduits” (rail and road).

Again, the Chelveston location is far from “the centre of gravity” and major trunk roads.

PPS7

“(i) “To raise the quality of life and the environment in rural areas through the promotion of :
.....(extract) continued protection of the open countryside for the benefit of all, with the highest level of protection for our most valued landscapes and environmental resources”.

Clearly the consideration of this location as a site for anaerobic digestion and the processing of waste runs directly contrary to this important planning guidance.

(ii) “To promote more sustainable patterns of development by;
.....(extract) discouraging the development of ‘greenfield’ land, and, where such land must be used, ensuring it is not used wastefully; providing appropriate leisure opportunities to enable urban and rural dwellers to enjoy the wider countryside.”

The construction of such a plant together with the continual processing of waste in such a quiet and undeveloped rural location would denigrate the enjoyment of this open countryside by the public and denigrate their opportunities for pleasurable leisure pursuits.