



## Northamptonshire Minerals & Waste Development Framework

### Preferred Options

#### With emphasis on listed site W8 - Chelveston

This review is our response to the MWDF Preferred Sites paper for inclusion in the consultation process of Northamptonshire County Council

### Introduction

1.14 There is no explanation of the reasons for rejection of certain sites by the Inspector. This would be useful, especially as the inference is that sufficient current capacity would have been available if these sites had not been removed. The removal of these sites and bringing forward of others proposed by the landowners is a clear indication that the nomination of preferred sites is lacking in forethought and strategy. Indeed, it is a random process, dependent upon private landowners nominating sites on a purely ad hoc basis.

1.17 The theory of development and other investment running alongside waste activities is not explained and alternative activities are not nominated. This makes the process completely open-ended from a planning perspective and means that any objective assessment of a preferred site and its potential impact upon the local landscape and environment is impossible.

1.19 Does this para suggest that once a site has been passed as “preferred” that planning consent is automatic?

1.20 The use of the word “allocated” would also appear to indicate some notion of automatic planning approval. The CC needs to be clear regarding this issue.

1.21 There is no correlation drawn between waste minimisation and the required capacity for waste treatment activities. How can a firm plan be developed without this information? Both input and output must be balanced.

1.25 This para suggests that Government legislation will be the primary driver in the approval of planning for preferred sites. The word “little room for divergence” indicates that once accepted, as a preferred site planning consent will be a fait accompli? Further clarification is required.

1.27 Does this para confirm that no site-specific representations will be considered after submission to the Secretary of State? Will there be no EIA type process along with local consultation?

1.28 Para 1.27 suggests that there will be no opportunities for local comment and review of the Strategic Environmental Appraisal. Is this the case? What is the scope and detail of the SEA? Who will manage the research process and draw up the report? Will the report be subjected to scrutiny and questioning?

2.4 What level of rigour has been applied to testing the plan options against the SEA Directive? This vital point is not covered in the document.

## Core Strategy Preferred Options

*“Integration of waste management facilities with other development”* is again brought forward as a *“key strategic development consideration”*. Again there is no expansion of the point and we are left wondering exactly what is meant. As a key point that would have a potentially huge impact upon affected communities this objective needs clarification.

4.1 The point is made that, “In finalising our MWDF Core Strategy and Locations it is important that you have a continuing chance to influence the strategic direction”. The exact scope of this opportunity, **to influence the strategic direction** between the requirement to observe Government (National) and Regional guidance and the apparent lack of ability to comment after submission or upon the SEA needs clarification.

4.3 This para again makes the point that the CC is *“Keen for your (consultees) views on the Preferred Options to assist in refining the strategic policy direction and ensure that we (the CC) are heading in the right direction.”* Again, exact clarification of the scope of this opportunity needs to be established.

4.4 This para appears to contradict 4.1 and 4.3 in that it limits comment to site specific matters and excludes, for instance, the opportunity to criticise the basic premise that only sites brought forward by owners and developers can be included in the site list.

4.6 The *“detailed assessment”* claimed has not been transparent and the site comments in the Technical Index are extremely brief, indicating a lack of detail and robustness in the process. The *“waste forecast”* seems to be more concerned with nominating capacities for the sites rather than an objective assessment of waste output.

## Core Strategy – Preferred Options

1.2 The process of ensuring that identified sites are *“fully in line with the Core Strategy”* is essentially flawed due to the limitation of considering only those sites that have been proposed. This in itself was a random process and means that there must be a huge scope for compromise both in the establishing the Core Strategy as well as trying to fit this limited and randomly selected list of sites within it. This lack of integrity and rigour is a fundamental flaw in the whole process. What, for instance, would have been the result if no sites were proposed by their owners? The limitations of the basic process must mean that there is an imperative to fit sites within the Core Strategy or vice versa or both.

2.3 The notion that The Vision should *“demonstrate a sense of local distinctiveness and identity, as well as considering the functional relationship between key economic, environmental, social and physical features of the area”* is hugely compromised by the necessity to “choose” from a limited list of nominated sites. There was no democracy or local influence in drawing up the site list, which was merely a wish list of sites, put forward by private landowners. Again, this statement is at arms length and from the list that was available to be produced. Any tests against these objectives were subsequent to the establishment of the list, which suggests significant compromise, and lack of thoroughness.

2.5 Any reference to *climate change* in the context of this subject is politically and emotionally driven. There is no methodology or suitable data by which the direct effects of any Northants waste strategy on climate change can be assessed. The inclusion of any linkage comments on climate change infers that such data has been assessed and somehow should influence the decisions on waste strategy. Similarly, general references to *“sustainability”* in this same context are meaningless and should not be used.

2.8 The inclusion of comments such as “...investment in the delivery of a high quality built and natural environment etc”, in The Vision are wholly meaningless and are not supported by any evidence that such qualities are peculiar or exceptional to the development of Northamptonshire nor that they will be assisted or delivered by a Northamptonshire waste strategy. The term “sustainable communities” in this context infers that sustainability requires this particular approach to waste management when there are many alternative routes to reducing waste and CO2 emissions. These motherhood and apple pie statements do not add value to the process of establishing a waste strategy for the county. They are political and merely attempt to exert a hidden moral pressure in the idea that this process and its outcomes are necessary for the well being of the planet and humanity.

2.12 We agree with the comments made regarding the avoidance of river valleys. In East Northamptonshire intense quarrying took place over many years along the Nene between Wellingborough and Thrapston. It is wrong and too limiting to arbitrarily exclude such sites from consideration. The grassland that comprises the Chelveston location is far rarer in this part of East Northamptonshire than the deposits of river valleys, but for some reason this process considers that it has a lower intrinsic value.

### **The Key Principles**

Attention is drawn to the statement “*minimising waste and optimising the use of existing infrastructure networks and previously developed land*”. The Chelveston site is neither blessed with an *existing infrastructure network* nor is *previously developed* in the normally accepted sense of high-density building and plant. Even when it was a WW2 airfield, abandoned over forty years ago, only a small proportion of the site could be said to have been *developed*.

Objective 3 is couched in very general terms, but again promotes the further development of chosen waste sites along with “*other growth investment areas*”. There are no such areas within some miles of Chelveston and in geographical terms the site does not match this longer-term objective in any sense unless a wholesale and radical revision of the local area is envisaged in terms of “*growth investment*”. There is no empowerment in the MWDF process for such a vision for this location.

Objective 5 specifies “*the delivery of a strategic urban-focused flexible waste management network which supports the proximity principle...*” The Chelveston location is remarkable for its lack of any “*urban*” characteristics and its distance from the intense development that has been and is taking place in the true “*urban spine*” that runs from Wellingborough towards Corby. The same objective again stresses the wish for *integrated waste recovery*, clearly inferring progressive and incremental expansion of those sites that are nominated in the final list. How can consultees provide a comprehensive response to this exercise without knowing **exactly** what the document has in mind with this statement and the objective of linkage to further industrial development?

Objective 8 – what is meant by “*incompatible development*”? This is not set out and it is therefore impossible to comment

Objective 9 – the “*distinctive local identity*” of the Chelveston site is of open grassland and grazing animals and, along with the adjoining countryside, a marked lack of any development and manmade structures.

Objective 10 – these are fine words and, if followed, should clearly exclude the Chelveston site from the final list, which has a landscape environment uniquely free of current development and building, development, noise, odour or light pollution.

Objective 12 – the *health and residential amenity* of communities around the Chelveston site would be significantly denigrated both visually and in terms of damage to the senses as set out in the comments under Objective 10 above. There is currently no development with any of the characteristics of a waste treatment activity within many miles of the location.

### **The Spatial Planning Strategy**

3.1 The point is made that *“Planning for minerals and waste-related development needs to be linked to the wider development picture”*. The communities and countryside around the Chelveston site in both Bedfordshire and Northamptonshire are not earmarked for any sizeable housing or commercial development. The area is not included within the development areas to the west and north of the Chelveston location. There is no trunk road available until the A6 bypass at Rushden. The locality is not within the nominated urban spine and no natural linkages exist between the *“wider development picture”* and the area around Chelveston.

3.2 This part of Northamptonshire is specifically not part of the *Sustainable Communities Plan growth proposals* for Northamptonshire, Milton Keynes or the south Midlands and there is no criterion that links the area with that programme.

3.3 The nominated *County growth* areas do not include any areas east of Rushden, including that around Chelveston. The map shown on page 21 of the document evidences this. Any development at Rushden will graduate towards Wellingborough on the west side of the town and further development in the conservation town of Higham Ferrers cannot take place if the Nene river valley is to be protected to the north. Bedfordshire lies to the immediate south of Rushden and this area is not planned for development. The dotted line drawn to depict the Midlands and south Midlands Growth Area is wrongly drawn to the east. Chelveston lies clearly between and well away from this development area and that of Cambridgeshire running up to Peterborough. The siting of any waste treatment activity at Chelveston would clearly breach the attempt to retain the rural characteristics of this area and would instead begin to promote a development character to the area, which has clearly been avoided. Such an approach would cut across the plans of the neighbouring and adjacent counties of Bedfordshire and Huntingdonshire. The *“proximity principle”* does not apply to the Chelveston site and waste generated in the urban areas of Rushden and Irthlingborough would naturally be better pulled towards facilities located well within the genuine urban spine to the west and north. For the reasons noted above, a waste activity to the east and south at Chelveston would represent a clear anomaly and would introduce traffic movements and activities within an area nominated to be clear of urban expansion. Locally generated waste would not justify a facility at Chelveston and as a consequence waste would be pulled into green and undeveloped countryside from the development areas, which would undermine the landscape characteristics and the ambience of the locality. This would be a clear breach of the notion that the area should remain free of significant development and place a breach in the rural landscape between the two primary development areas of Northamptonshire and Cambridgeshire. This would lead to a significant undermining of the principle of maintaining an undeveloped countryside between high-density urban developments.

3.6 This para makes the point that modern waste management is *“no longer rural-centred”*. The Chelveston location is indisputably rural in nature.

3.9 The Chelveston location is well outside of any *“identified growth areas”* and the local population is far too small to support an efficient combined heat and power scheme, which should be located as close as possible to the sources of use in urban areas.

3.10 Chelveston cannot be said to support an “*urban centred approach*” due to its rural location and lack of any infrastructure links with the urban development areas.

3.11 The Chelveston location has no natural correlation to the Spatial Strategy and the fact that the site happens to have been put forward should not be allowed to compromise the integrity of this prime objective.

**The Preferred Approach** – Rushden should not be included in the list of towns. It is at the extreme edge of the urban area and has restricted development opportunities.

### **The Spatial Strategy for Waste Management and Disposal**

3.35 The point is made that “*As most landfill sites are in rural areas there is not the skewing of Waste Local Plan sites towards the urban areas*”, a characteristic that would be enhanced against the stated policy in the document by including rural Chelveston as a finally agreed site.

3.36 This para goes on to state that the lack of an urban focus renders the Waste Local Plan ineffective because its “*allocations do not effectively drive the development of a network of sustainable waste management facilities*”. The rural and unattached nature of Chelveston in the context of the urban spine is at odds with this key principle and the inclusion of Chelveston in the final list would represent a massive and obvious compromise of this policy.

3.38 For the reasons given above, it is obvious that Chelveston does not have the characteristics or geography for any of the scale options outlines. The local community is too sparse to provide sufficient waste or to consume energy that it may provide from processing. A large and integrated facility would be markedly against the principle of an urban centred choice of location. There does not exist development in the area that could be used to support integration.

3.39 Chelveston would not match the desire for “*proximity to source*” due to its distance from urban development and location far to the east of the urban spine. The “*local impact of development including highway impact*” would, due to lack of road infrastructure and overwhelmingly rural nature would be in direct opposition to the policies espoused.

3.41 This para states “*a need to have flexibility for future requirements*”. The Chelveston site is very large and once any development took place would provide an unacceptable temptation for expansion and the introduction of different forms of waste treatment. For the reasons of location, lack of infrastructure, denigration of the environment, visual impact, damage to existing landscape characteristics, loss of locally unique grassland, distance from sources of waste etc., any temptation to include this site should be avoided from the start and a marker laid down that the area is to retain its essential nature as evidenced by its exclusion from the nominated urban growth areas. The mere “*availability*” of the site in the list and smallness of adjacent communities must not be allowed to camouflage the fact that its location and characteristics are at odds with key policies of the MWDF document.

3.42 Emphasis is again placed on the need for waste activities to be located within the “*county’s main urban spine*”, a criteria that Chelveston does not meet. It is nonsense to suggest that Higham Ferrers, a small conservation town, is included in the *main urban spine* and Rushden is clearly located on the very edge of the southeastern extremity. The epicentre of the towns listed is Kettering and any waste facilities require being located in the Kettering area in order to provide the transportation and delivery logistics required to serve the volume streams of the primary sources of waste. If Corby is included, as it should be, the centre moves even further north. The favouring of “*areas of general*

*industrial use*” as locations for waste development again clearly excludes Chelveston, which has no such development, and has none planned for the area. In contrast, Kettering and Corby have many such areas.

3.43 This para seeks to compromise the principles laid down of closeness to urban development areas, but continues to state that *“general industrial areas and any new development areas”* are still preferable even in these rural areas outside of the urban spine. Again Chelveston cannot be said to be even connected to such areas let alone be categorised as one.

3.45 For reasons of location alone, the wording of this para specifically excludes Chelveston from being considered as a major waste treatment facility.

3.46 Chelveston is clearly located well within the *“rural hinterland”* and as such this para appears to suggest that any waste produced locally around Chelveston would be managed by a rural or urban centre located towards and within areas of higher population and waste. In the context of this para transportation of the small local quantities of waste to Stamford as a rural service centre or Kettering as an urban spine centre would appear to be the most effective and least ecologically damaging.

Chelveston is well outside of any of the criteria summarised within ***“The Preferred Approach: The spatial development strategy for waste management”***. Chelveston is not earmarked for any further development matching the development criteria set out in this summary. Neither is it located within or near to the cluster of urban locations, which is pulled to the north with the inclusion of Corby.

3.50 The suggestion that Rushden be included as a location to capture waste from rural north Bedfordshire makes little sense. Bedford is a far more viable location to take waste from south of Rushden and even Rushden itself. It is also blessed with significant areas of former clay extraction for brick production and other *“brownfield”* locations.

As well as being clearly outside of any of the suitable locations for primary waste management facilities, Chelveston does not match any of the development criteria set out in the summary ***“The preferred approach: Categories of waste management facilities”*** for even the smaller ***Neighbourhood*** locations.

Page 36 – Map. This map is incorrect. An attempt has been made to capture Higham Ferrers and even rural areas to the east and into rural north Bedfordshire into the Northamptonshire *“urban spine”*. This *laissez faire* approach to a key-planning subject is not acceptable in its implication that areas designated and accepted as continuing as rural in character should be urbanised. As previously stated, Rushden itself is at the southeast extremity of the designated urban spine and on this basis it would be geographically reasonable to include Market Harborough or even Towcester. According to this map, the inclusion of Rushden leaps a swathe of open countryside from Wellingborough and the *“protected”* Nene river valley at Irthlingborough.

3.54 This para states that *“Landfill is invariably in rural areas; as such it could be argued that using landfill sites for permanent waste management uses would not support a sustainable distribution pattern”*. As Chelveston is obviously in a wholly rural area the location of a waste site there can also reasonably be assumed that it would not support a *sustainable distribution pattern*.

3.56 The key point of *“discouraging (even existing) sites outside urban areas for future waste management use”* – our italics, again emphasises the unsuitability of including a rural location such as Chelveston in the list of approved sites. The *proximity principle* is again suggested as key.

## Identifying the future growth of waste arisings and our waste management capacity

4.32 The discarding of the “zero growth post 2016” option reflects a lack of ambition to meet the challenge of eliminating surplus waste at source of manufacture and/or consumption. More attention should be given to reducing waste arising so that expensive and damaging waste treatment facilities can be minimised. The proposed closing of landfill sites along with the rejection of this target means that the growth and expansion of automated and environmentally damaging waste treatment and incineration facilities will be higher than necessary. The mere existence of such facilities will thus encourage proliferation of waste arising from local communities and commercial industrial and retail premises. This is not a sound basis for a plan on waste management, lacks vision and is diametrically opposed to the notion that it will “drive behavioural change and a reduction in waste arisings” etc.

4.38 It is clear that Northamptonshire with its designation for very high, exceptional, rates of urban growth will be challenged to handle its own generated waste if more is not done to reduce arising at source. It makes no sense then to add volume from other counties merely to satisfy the *proximity principle*. On this basis there will be swathes of neighbouring counties that will be freed from the need to manage their own generated waste. They will become even lazier and their waste arisings will grow even faster.

The words used in the summary Sustainability Appraisal are loose and generic, failing to nail down a precise policy for Northamptonshire’s approach to waste management.

4.39 It is implicit in the words “*The provision of waste management capacity for waste arisings only from within Northamptonshire may restrict the viability of some waste management technologies and could potentially hinder the development of necessary infrastructure*”, that the preferred approach is for large volume waste processing facilities that may have to rely on waste arisings volumes from outside the county to be viable. This is a recipe for catastrophe and potentially sets up Northamptonshire as a waste factory for a large regional and perhaps national catchment area. Adding to this the *proximity principle* as it applies to Northamptonshire’s proximity to other county’s urban areas, it can be deduced that this MWDF wants to encourage the importation of waste into facilities within Northamptonshire. The people of Northamptonshire have had no say in such an expansive policy regarding waste management. The county is already congested and lacking in infrastructure to support planned growth. It is unrealistic to also in effect propose that it becomes a waste-treatment centre for a wider region.

4.40 More of the same – Northamptonshire will look to handle waste volumes outside of the county.

As a result of the above, the summary “***The preferred approach: Identifying our waste management catchment area***” lays down a policy that is unsustainable, environmentally damaging and encourages the transportation of waste over longer distances, which will increase congestion and CO2 emissions. This must be unacceptable to the people of Northamptonshire and takes no account of their sensitivities.

4.47 It is not clear whether the residual landfill sites that may be provided will also take waste from neighbouring counties. The provision of waste treatment facilities for urban areas outside of Northamptonshire will use up capacity that could be otherwise used to divert Northamptonshire’s waste from landfill. Such a conflicting policy does not make sense.

4.50 The proposed reduction of the hazardous waste disposal facility is in direct contrast to the proposal to provide other waste treatment facilities to other regions. If the principle of allowing this to happen to provide economies of scale for the treatment units why would

an already existing facility be reduced? There is a fundamental lack of consistency in these different approaches.

## **Other key strategic development planning considerations**

### **Safeguarding minerals and waste development**

5.39 The choice of a 250m buffer zone is completely arbitrary. It would be inadequate for housing development and excessive for many other types of potential development. The principle should be adopted, but the distance should be determined in individual cases having regard to the treatment processes undertaken, the configuration and topography of the site and the proposed new development.

The summary, “**The preferred approach: Safeguarding mineral and waste uses**” ensures that not only does Northamptonshire provide facilities for other areas and regions but protects their availability in perpetuity. Shouldn’t the people of the county be involved in such wide-reaching proposals?

### ***Waste minimisation in new development***

5.41 The fact that “*minimising waste in new development was not specifically raised as a key issue*” again reflects the low expectations regarding this issue during the Issues and Options consultation. This should be a key matter for the future and would have a direct bearing on the capacity of treatment facilities required. The focus on provision of treatment capacity rather than elimination of waste arisings is a failure of vision.

The summary “**The preferred approach: Waste minimisation in new development**” is too brief and general, demonstrating the lack of attention given to this aspect. Minimisation of waste should be a key issue at the planning stage for new development and should establish legally binding targets for existing sites including all commercial and retail activities.

### **Integration of waste management facilities with other development**

There appears to be some incompatibility between the conclusion drawn under, “**The preferred approach: Integration of waste management facilities with other development**” and the above summary. More clarification is required.

### **Restoration and after-use of minerals and waste sites**

The conclusion that both restoration and after-use should not be prescribed in advance, but decided on an individual site basis following local discussion and having regard to local factors is correct. However, the apparent acceptance of the general Core Strategy that waste minimisation is not a key issue and the fact Northamptonshire will provide treatment and processing centres for other areas and regions runs counter to this interest in local solutions for local people. With these policies it will be decades, if ever, before any treatment centres can be closed down. This is a poor result for the county.

### **Encouraging the use of alternative transport methods**

5.56 In the case of Chelveston with its lack of a suitable local road infrastructure, there are no suitable alternative routing solutions for vehicles.

5.57 No rail or water solutions are available at Chelveston. It is correct that these transportation methods should be given priority when transporting waste and minerals and

is another important factor why the Chelveston site should not be allowed to go forward – wrong place, wrong local environment, wrong infrastructure etc.

5.60 The offsetting of carbon emissions, if achievable anyway, would offer nothing to local communities who are impacted by the activities of waste treatment and processing centres. Because of the absence of such emissions the impact at and around the Chelveston site would be profound and would alter the local environment to a substantial degree.

5.61 The requirement that *“proposals for new development to either use more sustainable or alternative transport methods or identify measures to offset greenhouse gas emissions”* is, in the case of Chelveston particularly, unachievable. There are no known “sustainable transport methods” that would be able to operate in the Chelveston area without major infrastructure development to lay down rail, guided bus routes or waterways. Offsetting carbon emissions is based on commercial incentives and the revenues available in waste management ensure that RoC’s can easily be afforded, ensuring that local communities will continue to suffer from carbon and other emissions. The last sentence is meaningless.

5.62 It is clear from the wording used in this section that there are no known solutions to hand for this problem in Northamptonshire, which runs counter to the wish to provide facilities for handling waste arisings from outside the county.

As a result, the summary ***“The preferred approach: Transporting minerals and waste”*** sets out a generalised objective for which there are no current practicable solutions. The issue is particularly so in Chelveston that does not have the density of population or other commercial activities to justify establishing the infrastructure required to provide genuinely alternative methods of transportation. The provision of, say, wind turbines to offset some of the carbon emissions for sites will serve only to denigrate the local environment further. In the case of the Chelveston site, which sits on a plateau that forms locally high ground, such an approach would have a devastating visual impact and would industrialise a Greenfield site within a designated rural region. For this reason, an application to install “green” generators has already been decisively refused by East Northamptonshire Council who are well aware of the owner’s wishes to turn this quiet rural location into an industrial complex based on activities that would destroy the local environment.

### **Development criteria for non-allocated minerals and waste proposals**

6.2 This para acknowledges that the provision required for waste treatment and processing sites will not be fully met by the proposed allocated sites. This makes it even more surprising that the Core Strategy wishes to provide facilities for waste arisings outside of the county. It also places an unnecessary pressure on Northamptonshire to maximise both capacity and processing volumes at the chosen sites. This policy will run counter to local environmental factors and will further denigrate the county landscape. It must, however, not be allowed to cause compromise in the selection of the final list of sites, particularly in the case of Chelveston where the site characteristics are overwhelmingly rural and undeveloped.

### **Development criteria for waste management facilities**

6.15 It is assumed that the development criteria set out for new waste site development will equally apply to the suitability assessment of the preferred sites listing. This would seem to be logical. On that basis, we make the following comment on various listed criteria with regard to the Chelveston location:

- *“A clearly established need for the development to serve local and sub-regional requirements for waste management”* – we have already established that local population and density and business activities and therefore waste arisings are very low. Also that sub-regional transportation would be excessive due to the fact that the Chelveston site is at the extremity of the county and outside of the designated urban spine. The inclusion of Rushden and Higham in the latter is in any case disputed.
- *“The integration of waste management facilities”* – the lack of local commercial and industrial activity and therefore waste arisings volumes compromise this objective.
- *“Maximise opportunities to co-locate facilities together and with complementary activities”* – see above comments.
- *“Maximise the re-use of previously developed land, redundant agricultural and forestry buildings, and cartilages”* – The Chelveston site was never “developed” in the usual sense. It had an airfield runway and limited temporary hangers. The site has been turned over to agriculture for over forty years and is used for grazing of sheep and cattle. The only building remaining is a small single-storey administration facility in the middle of the site. A single metal lattice tower also remains. The narrow main runway has been retained to allow travel through the site. Of the 758 acre site it is estimated that all but 2 per cent is grassland and the appearance and nature of the site is overwhelmingly rural.
- *“The minimisation of, and balance in, the movement of waste across the Northamptonshire county boundary, except where the development involves specialised provision and is consistent with regional self-sufficiency”* – the essence of this criteria runs counter to the Preferred Options policy of maximising waste arisings through importing volume from outside of the county. In any case, the adjacent areas to the Chelveston site in both Bedfordshire and Huntingdonshire are also rural in nature dotted with small-scattered villages and waste arisings would be very low in volume.
- *“Minimise the transportation of waste from its source”* – it has been established that the use of Chelveston would elongate journey distances and times, thereby creating an excess of CO2 emissions and general vehicle pollution. Very large vehicles would not be able to be handled effectively due to the lack of local suitable road infrastructure around the site.
- *“Maximise and enhance the existing transport infrastructure networks to support the sustainable movement of waste, and products arising from resource recovery, seeking where practicable and beneficial to use modes other than road transport”* - - the location of the Chelveston location is directly counter to this criteria. It would not be economically viable to enhance the local road infrastructure and there is not local “network” of suitable trunk roads. The local activity levels of people and commerce would not justify such investment. Similarly, there are and would be no alternative forms of transport available.
- *“Minimise adverse impacts on the environment, local community, human health and safety, natural resources, visual amenity and traffic”* – the Chelveston location stands on a plateau that is 60 – 120 ft higher than the surrounding countryside and its communities. Apart from grazing and arable farming there are no other activities within some miles that encroach upon the silence or ambience of the countryside. There is no pollution from emissions, no noise and virtually no movement. There is a significant absence of night light pollution when compared to the rest of the county. Any development on the site would therefore have an exaggerated impact, especially visually. The B645 road is entirely unsuitable for HGV’s and a ban over 17T GVW

applies east of nearby Tilbrook. The proposed waste plant would be a gross intrusion upon the landscape and would seriously degrade the local environment due to the current exceptionally low levels of ambient noise and activity.

It is suggested that the criteria should be extended to include the effects of *cumulative impact*. There is already a substantial waste treatment plant at Wymington, which is about 4-5 miles away from Chelveston as the crow flies. On most days, the belching of smoke can be clearly seen from many miles around this site. A further treatment site is located at Tilbrook, just over the county boundary in Huntingdonshire. It is unnecessary to even consider Chelveston for a sub-regional facility when the existing Wymington site has plenty of space to handle all the waste arisings from the rural hinterland of this part of Northamptonshire and should also be considered as a source for waste arisings from the southeast section of the urban spine. The Wymington site is close to the A6 trunk road and within a mile of the Midland mainline railway.

## 8.5 Core Strategy Policies

### CS10: Northamptonshire's waste management capacity

It would be useful to know a) current capacities by type, b) current actual volumes by type, c) the calculations behind the forecast capacities.

### CS11: Spatial strategy for Northamptonshire's waste management network

Chelveston is outside of the proposed urban spine and therefore the optimum network locations. Chelveston does not meet the criteria stated, "*Facilities best located in rural areas should be strategically located so as to serve existing and allocated growth areas*". The area for some miles around Chelveston is not designated for growth and has minimal existing waste arisings. Similarly, the requirement to develop any national or regional facilities "*within the main urban spine and secondly Daventry*" would not be met by locating a facility at Chelveston. The use of Chelveston would be at odds with the statement, "*The application of the proximity principle should give consideration to the scale, facility type and catchment area required to enable optimal operation*", due to the fact that waste volumes in the area are very low. On this basis there would be no placement of a waste management centre of any type at Chelveston.

### CS12: General development criteria for waste management facilities

Chelveston as a location is directly in opposition to the following stated criteria:

- "*A clearly established need for the development to serve local and sub-regional requirements for waste management*" - (Waste arising are too low. Wymington could easily absorb arisings from the area around Chelveston)
- "*Contribute towards the development of a sustainable waste management network for Northamptonshire, including the identification of the facilities catchment area and market base for any outputs*" - (As above – local waste volumes around Chelveston are very low and the area is not located within the urban spine. Wymington could handle arisings from Rushden and Higham as well as the rural hinterland around Chelveston)
- "*The intended catchment area is consistent with the principles of proximity and self-sufficiency*" - (Chelveston would not meet this criteria for the reasons given previously)
- "*Minimise the transportation of waste from its source etc*" - (The lack of waste volume arising locally would mean that the vast majority of any volumes processed at Chelveston would require excessive distance to be travelled from areas of high density housing and activity)
- "*Where possible the proposal should seek...be strategically located to serve new and existing growth areas*" - (Chelveston is not designated for growth and the area around it has a sparse population density)

- *“Maximise the re-use of previously developed land etc”* - (The Chelveston site has had no development for over 40 years. The low-density development previously was purely for temporary military use – WW2 – and the vast majority has now been dismantled. The site is now 98 per cent + grassland. East Northamptonshire Council has formally considered the site as “Greenfield”)
- *“Give consideration to the spatial land-use context and be sympathetic to the surrounding environmental character, particularly in relation to rural and urban development”* – (The Chelveston location and surrounding area is wholly rural and marked by a lack of any high- density housing development or industrial/commercial activities. The location is highly visible and rises above the surrounding countryside. Any development would have a substantial visible impact for miles around. Due to the inherent nature of the location the activity outputs from any waste management process would be highly intrusive and would alter the characteristics of the area. The Chelveston site when considered from an environmental perspective and having regard to the landscape character is clearly an unsuitable location for a waste treatment centre of any type)

CS13, CS14, CS15 – see previous comments

CS16 *Provision of neighbourhood waste management facilities”*  
Chelveston does not meet any of the three criteria established under CS16

CS19 *Encouraging sustainable transport movements*

The Chelveston location is clearly at odds with this objective. The distance from sources of waste and point of consumption of any alternative energy would mean that CO2 emissions would be excessive and energy transmission distances inefficient.

## **Monitoring of the Core Strategy DPD**

### **Table 2: Proposed Core Strategy monitoring framework**

CS11: *Spatial strategy for Northamptonshire’s waste management network*

Any inclusion of Chelveston within the list of approved sites would immediately run counter to the Spatial Strategy for the reasons given. The willingness to tolerate 5 per cent of treatment facilities outside of the spatial strategy indicates a lack of robustness in following the agreed policies.

CS12: *General development criteria for waste management facilities*

The target is correct and underlines the importance of the spatial strategy. The CC must avoid running scared of Appeals and stand firmly behind the policies determined.

CS14: *Waste minimisation in new development*

This criterion requires more detailed development. The minimisation of waste in both old and new developments is critical.

CS19: *Encouraging sustainable transport movements*

These criteria should be mandatory and not be distilled by allowing carbon offsets through incorrectly sited renewable energy plants or use of the commercially driven carbon trading system.

## **Locations for Waste Development Preferred Options**

1.2 Attention is drawn to the statement, *“It will do this by drilling down the vision, key principles and policies for waste-related development that will be in the MWDF Core Strategy etc”*

It is vital that the policies and criteria set out in the MWDF are robustly applied throughout and not compromised. On this basis, for the reasons set out above, we submit that the Chelveston location is unsuitable in a variety of ways.

### **Relationship to the Core Strategy**

1.3 This para makes the point that the relationship between the Core Strategy and the Locations for Waste Development DPD is *“very specific”* and *“acts to identify sites in line with the spatial strategy etc”*.

On this basis the sense of compromise suggested for the review of new sites where the forecast waste management capacity is not met is a serious concern. It is submitted that Chelveston would be outside of much of the key criteria proposed and should not therefore come into the reckoning even in the event of a shortfall. This is especially the case at the MWDF earlier suggests making capacities of sites available for imported wastes. Any available capacity within the active waste management network should automatically be used to absorb waste arising within the county if to do otherwise would in effect create a shortfall and a demand for new sites.

### **Locational criteria for waste development**

3.1 It must be remembered that incineration is an inherently dirty process and that it is impossible to eliminate all emissions. Incineration at Chelveston would be particularly problematic because the site is well above surrounding communities and so would suffer an excessive effect from the “fallout” due to the fact that it would not have had enough time and distance to sufficiently dissipate within the atmosphere. Similarly, anaerobic digestion produces noxious sulphide-based odours that are heavier than air and float down to settle in lower lying buildings and enclosed areas. In particular, much of Hargrave lies within the path of the prevailing southwest winds from the Chelveston location at lower levels and has streets that are enclosed with high banking.

3.3 The above comments on incineration apply.

3.4 In considering any waste treatment process, due account must be taken of the positioning of the site relative to the local topography and communities. The height of the Chelveston location relative to the surrounding area would represent a particular issue with regard to any emissions and their effect upon local communities.

### **Locational criteria for local waste management facilities**

3.8 A key requirement in this para, *“That is, local facilities would be best situated within, or incorporated into, new or existing housing industrial or commercial developments, where the sites act to serve the development as a neighbourhood facility”* is not fulfilled by the Chelveston location, which has no such developments of any scale or density. The fact that an EIA is not required for developments below 50,000 tonnes per annum should encourage the CC to be even more robust in its consideration of the environment for such proposals. A modest sized development within a particularly rural and sensitive area can have far more negative impact than a much larger development in a highly urbanised and/or industrialised location.

3.9 It is notable that the Chelveston site fails to match any of the six locational criteria set out in this paragraph.

3.11 The suggestion that, *“a more appropriate approach would be to consider whether the proposed waste facility is suitable use for that proposed site, irrespective of its capacity”* is particularly relevant to the Chelveston site where the establishment of

any waste facility would degrade the landscape and damage the local environment in addition to causing damage due to excessive transportation distances from sources of waste. Renewable energy production from small waste plants is not useful and would be insignificant in terms of its impact despite the fact that the profligate carbon-trading scheme means that such schemes deliver high profits to the operators despite the limited and variable power produced.

3.13 The need to meet the locational criteria established under 3.9 is emphasized as key and it is repeated that Chelveston fails to satisfy any of the criteria.

*The summary, “The preferred approach: Locational criteria for local waste management facilities”* again emphasizes the criticality of waste management facilities being sited to meet the locational criteria. The summary states, that proposals must also, *“demonstrate a relationship with either a sustainable urban extension or any location for new development equivalent to 1000 or more dwellings; be located on existing or designated industrial land or on derelict, despoiled or brownfield land or buildings, or redundant industrial or farm buildings in rural areas; or be a former or existing mineral working or waste management facility”*. The Chelveston location is neither derelict, despoiled nor brownfield and has just one small “redundant” building. The Chelveston location also fails to match any of the latter criteria. In summary, it can be stated that Chelveston singularly fails to meet any of the dozen or so criteria set out as key when reviewing sites offered for waste management facilities. To have Chelveston go forward as a proposed site would represent a massive dismissal of all they key locational criteria and fundamentally undermine the policies established by the MWDF.

3.19 Care needs to be exercised when considering the sites offered to ensure that policies and criteria suggested in the MWDF are met and that any temptation to “use” a site merely because it has been made available is eliminated. The pressure to make available sites “fit” the constraints will be high in a situation when available capacities are inadequate, but compromise must be avoided if the review process against the MWDF is objective and has integrity.

3.21 It is recognised that consideration of *“social, cultural and environmental criteria”* will be captured outside of the MWDF, but in the case of Chelveston it is important to recognise that these are key issues reflective of the unusual level of rurality in the area around the location.

3.22 The proposal that national locational guidance *“be refined to reflect Northamptonshire’s local circumstances “* is fully supported. Recognising local distinctiveness is vital and particularly so when considering the landscape characteristics, appearance and structure. National Government has national priorities and local people rely on their county and local councils to protect them against ignorant, high-minded and prescriptive national directives or guidance. Every attempt should be made to recognise the local interest and countryside as key to the retention of distinctiveness in those parts of the county whose landscape character has not been destroyed by the far-reaching urbanisation of much of the county.

### **Locational criteria for waste management facilities**

3.26 Reasons why the Chelveston location is unsuitable and fails to meet the listed criteria are set out under various points above and specifically the comments against paragraph/section CS12. Chelveston as a site clearly fails against seven of the listed criteria of ten and the remaining points are relevant to the management and not the choice of sites.

3.27 Separate comments are made relevant to Chelveston against PPS10, which is concerned with planning policies for “sustainable waste management”. The comments pinpoint factors why choosing Chelveston would also fail to satisfy Government guidance and policy.

3.28 We agree with the comment that the acceptance of movements across the county boundary conflicts with the objective of minimising transportation of waste from its source. There is a clear conflict between the two.

3.29 It is agreed that the local infrastructure network or, in the case of Chelveston, the lack of it must be a key consideration in the choice of sites.

3.30 This paper raises many points confirming that Chelveston does not meet almost all the suggested locational criteria and the separate comments under PPS10 also demonstrate that the characteristics of this location also run counter to Government policy and guidelines.

3.31 There is ample evidence set out in this paper to confirm that the Chelveston location is unsuitable and contrary to the policies set out in the MWDF on grounds of failing to meet both location and development criteria.

### **Identification of the preferred sites**

4.1 The geography and characteristics of the Chelveston location mean that it would not meet the requirements necessary to form part of a “*sustainable waste management network*”.

4.2 The inherent characteristics, situation and location of the Chelveston site, its topography and its surrounding countryside count firmly against its choice, especially in regard to the following criteria set out under 4.2 as follows:

*“The extent to which the development will contribute towards a sustainable waste management network within Northamptonshire”*

The exact meaning of the word “sustainable” in this context is not clear. However, Chelveston would fail to meet the generality of the word on the two key grounds that it has negligible local demand for the waste treatment services and it is poorly located to handle waste from the urban spine.

*“Physical and environmental constraints on development including existing and proposed neighbouring land uses. Such as protection of water resources, land instability, visual intrusion, nature conservation, historic environment and built heritage, traffic and access, air emissions including dust, odours, vermin and birds, noise and vibration, litter and potential land use conflict”*

The Chelveston location and local environment is exceptionally at risk from the vast majority of these factors. The following current characteristics of the location should be set against the above factors when considering its choice as a site to go forward for development:

- Highest point in the area for some miles ensuring that any development would have high visual impact and emissions would settle in lower nearby communities.
- Currently virtually free of any buildings or manmade structures.
- Free from all but seasonal farming activities.
- Proposed site is currently grassland for grazing purposes, very rare in the region.
- Virtually no industrial or commercial activities for a radius of at least three miles.

- Low-density habitation made up of small-scattered villages and isolated farms and houses.
- Exceptionally low ambient noise levels, especially outside of peak travel periods.
- Very limited local transport infrastructure with the nearest A road at Higham Ferrers
- Difficult access over unclassified country roads.
- Unusually low levels of nighttime light pollution.
- Fragile wildlife environment, easily damaged.
- Situated in an area dominated by arable farming.
- Outside of the urban spine and at the extremities of the county.
- Having a number of protected historical buildings particularly in nearby Chelveston, Yieldon and Melchbourne.

*“Impact on local landscape character and sites of nature conservation, archaeological and cultural heritage value”*

Development on the Chelveston site would change the current characteristics of the landscape, impacting adversely on the environment of nearby settlements and degrading the general buffer area situated in the centre of the triangle between the urban spines of Northamptonshire, Cambridgeshire and Bedfordshire.

*“Cumulative effect etc”*

An anaerobic digestion site is located at Twinwoods about eight miles away and a further application has been made for such a plant at Westwood south of Rushden. A major treatment, disposal and incineration site is situated at nearby Wymington and a smaller incineration facility at Tilbrook, about five miles distant in a straight line. The Burton Latimer wind turbine installation can be seen from Chelveston, creating an incongruous and degrading development in the local rural landscape.

*“The capacity of existing and potential transport infrastructure to support the sustainable movement of waste etc”*

The local transport infrastructure is wholly unsuited to the movement of large vehicles and the rural nature of the area means that any major upgrade is extremely unlikely. The location is distant from the major sources of waste in Northamptonshire and its county neighbours. No alternative transport modes to road exist in the area.

*“Methods of control through planning conditions or agreements to ensure that impacts are kept to an acceptable minimum”*

The essential nature and characteristics of the Chelveston area are such that the imposition of planning conditions on development would not avoid fundamental change that would degrade the locality.

*“Benefits such as the provision of necessary infrastructure and services, creating job opportunities etc”*

For the reasons given above, the chance of any meaningful local infrastructure upgrade is virtually nil. The employment possibilities of this type of operation are minimal and could in any case be provided via an expansion of capacity at the nearby Wymington facility.

*“Priority should be given to the re-use of previously developed land, and redundant agricultural and forestry buildings and their curtilages”*

This land has never been “developed” in the conventional sense and the site has been progressively cleared and used for grazing for forty years.

In summary, the Chelveston location again fails to satisfy any of the criteria listed as required to identify a site for inclusion in the Plan.

## Approaches to site selection

4.3 The Chelveston location fails to meet the need to *“be very much based around the approach taken, albeit in line with the factors identified above”*.

4.5 The low volume of waste arisings locally render the choice of Chelveston as a waste development site incompatible with the need for, *“balancing the need for sites with the capacity of the area to accommodate them”* and neither can Chelveston be described as one of the *“areas of most need”*. Any *“assessment of impact on the surrounding communities”* would be found to be extremely negative for the reasons already outlined.

4.6 A *“fully market lead approach”* would be a crude and unthinking approach that would cut directly across the policies set out in the MWDF document and the various planning guidance's. It would exaggerate fundamental flaws and inefficiencies and destroy confidence in the safeguards of the planning system. The MEDF is correct to discard such an approach.

4.7 Use of the Chelveston location would singularly fail to meet the objective of *“balancing need with capacity”* as the local need would be far less than the capacity of even a very modest development.

Chelveston fails on almost every criteria set out in the MWDF and would fail to satisfy the process described under the summary, **“The preferred approach: Site selection”**

## Potential sites for waste-related development

A review and consideration of the Chelveston location against the criteria set out in the MWDF would, for the reasons set out in this paper, lead to a firm rejection of the site's suitability for development of a waste treatment facility. It is unclear how Chelveston came to be on the list of preferred sites and it is suggested that the review of the site was inadequate and/or failed to consider its inherent characteristics or those of the locality.

## MWDF Site Assessment Methodology

We do not consider that the Phase 1 and 2 Site Assessment Methodology as it applied to Chelveston is adequate or has been adequately applied against the criteria contained in the MWDF document. We consider that Phase 2 in particular fails to consider the site qualities required to meet the MWDF criteria for a waste management facility and that this paper demonstrates that Chelveston fails substantially to meet the criteria required. It is suggested that the exercise is repeated in the light of the comments in this paper and removed from the preferred sites list before the next stage is undertaken. We would be interested to examine the detailed results of the assessment if the site is not withdrawn. In the case of Chelveston, any review needs to take account of the fact that an existing site is just a few miles away at Wymington that currently imports the vast majority of waste from long distances. This site should be earmarked for regional access for Northamptonshire and Bedfordshire waste, obviating any need for any alternative site in East Northamptonshire. This would reduce the inefficiency and excessive CO2 emissions caused by the import of waste to this site from other regions, which runs directly counter to the objective of a *“sustainable”* waste policy and the wish to reduce CO2 emissions and minimise environmental impact. Use of the existing Wymington site would also eliminate further denigration of the landscape caused by cumulative development impact. Discussions should be held on an urgent basis with Bedfordshire County Council on this basis.

## Site Profiles: WA8: Chelveston

It is not intended to list comments against each point under the Site Profile for Chelveston. These have been handled in some detail within this paper. For the reasons set out previously, we would take issue with many of the suggested attributes of the Chelveston location described in the MWDF. We consider that the review has signally failed to capture the essential characteristics of the location and its locality. It has failed to highlight the drawbacks of separation of the area from the sources of waste or to consider the impact of development upon the site and its surroundings. It has ignored the fact that the majority of the criteria established in the MWDF cannot be met with the use of this location. We consider that the **Overall evaluation** is inadequate, shallow and inconsistent with the aims of the MWDF. **“The Consistency with the emerging Core Strategy”** is startlingly absent and we fail to understand how choice of the site is not in conflict with the emerging spatial strategy.

To suggest that a facility at Chelveston could *“focus on the urban spine”* is illogical and ignores the geography and the fact that the locality produces very low volumes of waste. Similarly, the idea that a Chelveston facility could act on a sub-regional basis again ignores the distances involved from the primary sources of waste and the fact that a suitable facility for such a purpose already exists at Wymington.

The distribution of liquid fertiliser from an anaerobic digestion process is constrained by market pricing issues and there is no guarantee that it would be used locally. Fertilisers used in modern arable farming require to be precise in the nutrients applied for particular soil and crop conditions and there is no information available that would indicate that such fertiliser from a process on this site would be suitable for local use or competitively priced. The constituents and sources of the waste processed would have to be analysed against the local need and this data is not available and would be variable in operation. In any case, this is an ancillary issue and should not have any influence upon the essential decision, which is where best to site waste management facilities. In this latter respect it is clear that Chelveston scores very badly against the MWDF criteria.

In summary, it is felt that the assessment does not reflect the true attributes of the site and its relativity to the MWDF criteria. It fails to recognise the adverse geography of the site in relation to sources of waste, the inadequate local road infrastructure, the minimal volume of local waste arisings and the danger to the essential characteristics of the area.

### Technical Assessment A – Site Assessment Methodology

A review of this document has concluded that the actual Site Assessment of WA8 is flawed and has signally failed to identify its shortfalls and incompatibility with the criterion set out in the MWDF.

We have compared our above analysis and conclusions with Technical Assessment A - Site Assessment Methodology Assessment and identified a series of deep flaws in the choice of WA8 Chelveston as a Preferred Site.

- 1.3 The MWDF will consist of a portfolio of individual Local Development Documents (LDD's), which are intended to provide a strategic spatial planning framework that guides future land use planning and promotes sustainable development and sound planning. Our review concludes that the inclusion of WA8 as a Preferred Site is wrong and is at odds with the spatial planning framework. For the above reasons it does not represent *“sustainable development”* and is not indicative of *“sound planning”*.

- 1.6 The identification of sites should be based upon a robust and credible assessment of the suitability of land.  
In the light of most of the conclusions in our review of the MWDF, we contend that the assessment of WA8 has been neither “robust” nor “credible”.
- 1.7 The purpose of the Site Assessment Methodology is to ensure consistency, maintain transparency and provide a sound basis for site assessment. Ultimately, site assessment, coupled with consultation will help to inform the planning process and identify preferred sites for minerals and waste development.  
The conclusions of our review are that the application of the Site Methodology in the assessment of WA8 is neither “consistent” nor represents a “sound basis”
- 1.8 A review of the policy context was undertaken to identify the key criteria used to determine site suitability and potential impacts on the receiving environment, or site sensitivity. Sustainability Appraisal objectives were also taken into account in developing the assessment criteria.  
Our review concludes that WA8 is unsuitable when measured against the requirements of the MWDF and the potential impacts and essential characteristics of the “receiving environment” have been misunderstood and/or not properly taken into account.
- 1.9 Additionally, ‘best practice’ examples and models (relating to site assessment criteria and methodology) were utilised to ensure a practical and robust methodology that would be capable of both informing and supporting planning decisions throughout the whole plan making process.  
It is contended that any application of “best practice” in the exercise of assessing WA8 would expose a number of substantial and fundamental flaws in the site relative to the MWDF.
- 1.14 The assessment process was developed to have the following characteristics:
- It follows accepted methodologies using acknowledged criteria;
  - It adopts a sequential process;
  - It is appropriate for the task;
  - It utilises current information;
  - It contains a sequence of ground truthing; and
  - It is subject to refinements, following review.
- In the light of the results of our review we must conclude that the site assessment of WA8 has not robustly followed the criteria suggested and has failed to account for many of the requirements and policies in the MWDF.
- 1.19 The following outcomes were achieved through the consultation process:
- Ensured that due consideration has been given to the relevant policy context and sustainable development objectives;
  - Development of a sound base for site assessment which satisfies Government guidance and legislative requirements; and
  - Agreement of an assessment methodology that is comprehensive and robust to support the MWDF.
- The outcome of our review strongly suggests that the choice of WA8 as a Preferred Site fails on almost all primary criteria to “support the MWDF”.
- 2.3 Coupled with the criteria, the assessment, or evaluation, process should seek to identify the main factors in favour of the site, physical and environmental constraints and potential adverse impacts resultant from site development, as well as mitigation measures (bearing in mind the envisaged nature and scale of operations and taking account of best available technologies not involving excessive costs). It is also important to include a comparison of site suitability against other sites in the local area.

We propose that the Site Assessment Review of WA8 has been anxious to establish “*factors in favour of the site*”, but has failed to adequately identify the “*constraints and potential adverse impacts*” of the location that are set out in detail in the above review of the MWDF. The assessment has also failed to consider the existing alternative treatment site at Goosey Lodge, Wymington, less than 4 miles in a direct line from WA8.

- 2.4 In addition, the cumulative impact of minerals and waste development on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential, should be taken into consideration.

The cumulative impact of other existing and proposed developments in the surrounding countryside has not been adequately assessed, evidencing the fact that the fragility of the local countryside has not been properly taken into account in the assessment process.

- 3.1 Phase 1 of the methodology seeks to produce an overall assessment of the site suitability and potential impacts on the receiving environment, or site sensitivity. The initial assessment will be applied to all potential sites with the aim of informing the Issues and Options consultation process and assisting in developing and refining options as per the SA process.

- 3.2 The assessment requires application of the Site Assessment Criteria to individual sites at a broad level, this will involve a desktop assessment using a proforma (Site Assessment Form, refer Table 2) detailing the Site Assessment Criteria, justification (outlining site specific factors) and potential impact rating (including the nature of impact), as well as an overall evaluation which will summarise the opportunities and constraints of the site and allow for consideration of cumulative impacts.

We have not set out comments on the detailed Assessment Criteria. We have made brief comments on the conclusions for WA8 below. We do contend that the assessment process relative to WA8 is flawed, inadequate and has drawn wrong conclusions.

- 3.6 The potential impact rating is an indication of the potential impact, or effect, resulting from the development in relation to specific assessment criteria, and is derived using a risk-based assessment model (incorporating the precautionary principle). The **potential impact rating is determined as a product of the scale and level of impact** as detailed in Table 3. The potential impact is also related to the nature of the impact.

We conclude that the impact ratings for WA8 have been underrated and indicate that the essential nature and characteristics of the local landscape and environment have been ignored or misunderstood. No consideration is given to the fact that this area represents Northamptonshire’s contribution to the rural “buffer zone” between the fast growing urban spines of Northamptonshire and Bedfordshire and as such is of regional and national significance.

- 3.7 The nature of the impact describes whether the proposed development will have a positive, negative or neutral impact on the identified criteria. The nature of the impact can be assessed and recorded using the following symbols and descriptors; positive / beneficial effect, neutral, or negative / adverse effect.

As above, we submit that the weightings relative to negative impacts on the location and local area of WA8 have been incorrectly applied and do not recognise the landscape character or local environmental conditions. The complete lack of a suitable transport infrastructure receives inadequate consideration.

## Site Assessment Panel

- 3.9 Site assessments were carried out by the Site Assessment Panel, consisting of internal staff members specifically identified to conduct assessments based on their respective areas of expertise (e.g. development control and environmental protection, landscape and amenity, historic environment, transport infrastructure planning, and economic planning).

We regretfully conclude that the experience and application of the Panel has not been sufficient to complete the assessment exercise of WA8 satisfactorily. We suggest that much of the nature of the location and the local area has been missed. There appears to be a misunderstanding of the basic geography of the location relative to the sources of waste arisings. The lack of suitable transport infrastructure has not been adequately taken into account. The importance of retaining the essential nature of the local landscape environment to the wider region as well as to the local communities has been missed. The vulnerability of local villages to substantial changes in their environment caused by even a modest development has not been understood or assessed. We cannot understand how any objective assessment of WA8 against the primary criteria of the MWDF could lead to its listing as a Preferred Site.

- 4.1 Phase 2 of the methodology seeks to produce a detailed assessment of the site suitability and identify more precisely opportunities and constraints associated with individual preferred sites. Phase 2 will involve further investigation into issues highlighted through the Issues and Options consultation of the preferred sites. This process will again inform consultation, but also support planning decisions through the Preferred Options stage of the planning process, as well as appraising effects as per the SA process.

As stated above, we contend that Phase 1 Assessment of WA8 has been deeply flawed and has wrongly allowed this site to be listed as a Preferred Site. We consider that WA8 should be withdrawn from the list of Preferred Sites at this stage. However, if this were not accepted, we would ask to be closely involved in any Phase 2 assessment and allowed to put forward our views on a face-to-face basis before the assessment conclusions are drawn up.

## Landscape Assessment

We have studied the part of the document entitled:

### **APPENDIX B – PHASE 2: LANDSCAPE CHARACTER & VISUAL INTRUSION ASSESSMENT**

However, we have not provided detailed comment because it is clear that the local importance of the site landscape and conditions has not been understood in the context of the wider local landscape. Also, the landscape qualities of the wider area and the fact that it is at the heart of the small rural buffer between the urban development areas of Northamptonshire, Cambridgeshire and Bedfordshire. In this context any development of this site that has been used for grazing for over forty years would represent a degrading of the concept of retaining “green” areas outside of zones designated for continued high density development. One only has to consider the rapid commercial and residential development taking place in areas west of Rushden and east of St Neots to recognise the importance of this area to the rural pocket that lies around the point where the three counties meet just east of Hargrave. Additionally, East Northamptonshire Council have recognised the former Chelveston airfield as a “greenfield” site and a recent application to install two generators has been refused by the Planning Committee for reasons connected

with protecting the site against incongruous development and degrading the local landscape and environment.

WA8 is set upon a plateau that stands on locally high ground and is 50-100 ft higher than the surrounding villages. Emissions, noise and light pollution emanating from the site would be exaggerated as a result and would rapidly degrade the environment and quality of life of the surrounding communities.

### **Technical Appendix Site Assessment WA8 – Chelveston – Phase 1**

As stated above, we consider that the Phase 1 process of site assessment of WA8 was deeply flawed, failing to take into account the characteristics of the area and has added to the mistaken decision to list WA8 as a Preferred Site, which fails to meet the primary criteria set out in the MWDF. The actual comments on the site itself were also misleading and shallow, failing to recognise its essential qualities and importance to the area. We are bound to say that we considered that the comments in the Site Assessment were dismissive of the location in terms of its characteristics and value to the local landscape and environment. We detected some anxiety to find the site as favourable for development and felt that the observations on site were superficial and failed to recognise its impact on the surrounding countryside. The approach was disappointing and indicated some hurry to get the job done. Our view is that the Phase 1 site assessment needs to be completely revisited and revised. We comment as follows on the actual site assessment criteria and the proposed justifications for the ratings.

#### \* Job Creation

There is no identification of the number or types of job that may be created. Anaerobic digestion plants do not provide significant employment and this is not a major factor in the consideration of the site. Incorporating the proposed capacity into the Goosey Lodge Site at Wymington would also add employment potential.

#### \* Economic Benefit

There are no details of outputs or analysis of economic benefit. The revenues from the operation of the site would accrue to the private owner and would not benefit the local community. There is no established price benefit to local farmers for using any liquid fertiliser, which may or may not be suitable for their use. The accrual of RoC revenues to the owner for any energy produced would be finance from a levy by electricity supply companies and would represent a hidden tax on consumers.

#### \* Air Emissions

The “small number of isolated rural dwellings” are vulnerable to development of the site and should not be dismissed. The height and position of the site is such that the fallout of emissions onto local villages will be exaggerated and would represent a risk to health and the local environment. Anaerobic digestion processes cause noxious sulphide emissions that settle in areas lower than the point of emission causing a pervasive and distressing odour that degrades quality of life and can cause health issues. The small plant at Twinwoods has been observed in this regard and the results were most unpleasant. The fact that waste handling activities would be carried out in buildings does not reduce concern that development would degrade the site and handling on and off vehicles and storage activities would have to be carried out in the open. Sulphide emissions cannot be restricted to the inside of buildings and would escape into the air to be carried some miles before they settled at lower levels.

#### \* Protection of Water resources.

The use of “sealed containers” is not an accurate description. Materials are required to enter and be extracted from the containers. Sulphide emissions escape from the containers. Problems in site operation can cause an escape of noxious fluids that can

damage the site ecology and cause pollution to enter water causes lower down from the site.

\* Land/soil quality

It is completely inaccurate to suggest that “*large amounts of concrete and buildings remain on the site*”. One building of any note remains and that is single storey. The narrow concrete runway has been retained to assist site access but has blended in with the landscape. Over 98 per cent of the site is grassland used for the grazing of sheep and cattle.

\* Noise and vibration

This aspect is completely understated and fails to take into account the negligible ambient noise levels. Satisfactory alternative routing arrangements cannot be made due to the lack of a transport infrastructure to and from the site and local communities will be directly affected by any increase in traffic. Any creation of bunds on site will have high visual impact due to the topography of the site and local area. Screening with trees will take at least twenty years to be properly effective even if growth density is acceptable.

\* Odours

Sulphide emissions are dealt with above. This aspect has been inadequately considered. Odours can travel miles from the site and the fact that communities are situated at lower levels makes them particularly vulnerable. Observation of the modern Twinwoods plant near to Clapham will provide evidence that obnoxious sulphide odours drift and settle distant from the site, indicating quite clearly that the “*sealed containers*” cannot be adequately effective.

\* Landscape character and visual intrusion

The assessment fails to identify the importance of the exact position of the site and its setting in the topography of the area. It does not take account of the fact that any development will have an exaggerated visual impact for some miles around. It omits noting that it comprises mainly grassland, which is very rare in the area and provides an environment for the grazing of sheep and cattle, also very rare in the locality. References to “the airfield” are misleading and do not convey the fact that the site is blended into the local landscape and no longer has the features of an airfield. Any development will be highly visible on this site and this will not be limited to the footpaths and bridleways on the site itself. Tree and shrub planting will not effectively screen any development for many years.

\* Nature conservation & geodiversity

The assessment demonstrates a lack of knowledge and understanding of the area. Local wildlife includes foxes, badgers, hares, deer, owls and buzzards as well as more common creatures. No mention is made of the fact that the fragility of the wildlife habitat means that it will be at heightened risk of any development.

\* Historic environment and built heritage

The assessment is again dismissive in considering this point and fails to observe that the area has undergone far less change and retained much more of its historical character than the development towns to the west. No reference is made to the fact that the area is remarkable for its lack of manmade structures and commercial and industrial activity. Again, the assessments demonstrate a lack of respect and understanding of the area. There are no references made to protected historical buildings in nearby the villages of Bedfordshire and Northamptonshire. The importance of retaining a predominantly rural landscape in the midst of rapid urban development areas receives no attention.

\* Vermin and birds

The notion that all of the site activities would take place in hermetically sealed containers is misleading.

\* Litter

Any litter on this site would be very noticeable and would degrade the area.

\* Stability of landforms

No comments.

\* Bird strike hazard

Not considered an issue.

\* Impact on agricultural activities and land

References to “disused airbase” imply that the site has an industrial and developed appearance, which is wholly incorrect and misleading. Loss of grassland for grazing would be regrettable and would alter the characteristics of the site. Screening would not be an adequate solution and would not be effective for twenty years or more.

\* Potential for beneficial restoration after use

The assessment makes the point that the proposed development is “permanent”.

\* Extent to which potentially adverse impacts could be minimised or mitigated

The assessment completely fails to acknowledge that due to the position and topography of the site that adequate mitigation would be feasible. Due to lack of road infrastructure alternative HGV routings that would avoid impacting the local environment do not exist. The lack of adjacent development is taken as a reason to promote the site rather than recognising that the rare rural aspect should be retained.

\* Environmental nuisance

The “lack of sensitive receptors” does not eliminate environmental impact. The very fact that houses and communities are low density means that the environment of the site is more fragile and the impact of any development would be exaggerated. People in the area do not just stay at home, but enjoy walking and riding in the local countryside. Again, the indication is that the sparseness of nearby housing is taken as an excuse to promote the development.

\* Impact on general amenity or character of the area

To suggest that, “The impacts on general amenity and character of the area is likely to be limited” implies a complete lack of proper observation and understanding of the area. No account is taken of the solitude, quietness and lack of commercial activity in the locality, which would be seriously denigrated by development on this site. The comments accept that any development “will be visible to surrounding areas” but appears to give no weight to this observation. Again, the impression is given of a cursory look at the area and a lack of respect for its qualities.

\* Impact on recreational opportunities and open spaces

It is obvious that any development on the site will have a direct impact on the network of footpaths and bridleways. Material would have to run across these in order to be delivered to and taken from the site.

\* Safe and effective access to and from the site

The assessment fails to make any suggestions as to how traffic could be managed from the A6 and fails to assess the impact of additional HGV's on the A6 itself. No account has been taken of transportation across this 758-acre site to the proposed development location.

\* Capacity of transport infrastructure to accommodate type and level of traffic resulting from the proposal

The assessment fails to take into account that all the local roads that could be used to service the site are narrow and unclassified. The fact that the B645 is dangerous, has a weight restriction after Tilbrook and runs through the middle of Chelveston has been ignored.

\* Potential impact on existing transport network

The remarks indicate a lack of appreciation of the local road structure and should be revised.

\* Conflicts with non-industrial traffic on access routes used by heavy commercial vehicles

The conflict with the (mainly) light vehicle and rural traffic movements around the site has been recognised, but there is no indication that the nearby roads have been observed.

\* Capacity for sustainable transport options

The point is not answered. There is clearly no viable possibility of creating capacity for whatever may be meant as “sustainable transport options”.

\* Site occupation i.e. brownfield vs. Greenfield

The attempt to designate the site as “brownfield” is careless and wholly incorrect. The site was a former airfield – over 40 years ago and has since reverted to agricultural use, specifically grassland for grazing animals. The airfield use was temporary and was a

transitory intrusion on the use of the land for agriculture. The old airport infrastructure has been comprehensively dismantled with the exception of one small building and the Boxer tower. An estimated ninety per cent of the site is free from structures. Footpaths and bridleways crisscross the site, which has an open aspect, blending in with the surrounding countryside. Again, this dismissive attitude to the impact of development on this site is unacceptable and degrades the assessment process.

\* Sufficient are to accommodate proposed development

An attempt is made to set the airfield as a separate and degraded site in the local landscape. Mitigation measures would not be effective for the reasons given.

\* Impact on infrastructure network, particularly related development.

There is only one small relating building on the site and the notion that *“the proposal is to use some of the existing infrastructure that is already present on the site”* infers that extensive possibilities exist for re-use. This is completely incorrect and further destroys confidence in any of the observations made. It is, of course, in the interests of the landowner to portray the site as degraded, industrialised and strewn with buildings available for re-use. Such an impression is totally misleading.

\* Contribution towards infrastructure improvements

It is difficult to take these comments seriously. The writer seems to have concluded that the use of narrow country roads and the crossing of footpaths and bridleways by HGV's to service the site is acceptable.

\* Clearly established need for the development

The facility would be in the wrong place.

\* Contribution towards sustainable waste management and a reduction in reliance on landfilling

The term “county self sufficiency” is not used in any measured sense and has no intrinsic morality in its own right. No comment is made on the fact that extended distances from the sources of waste will cause additional road congestion, environmental degradation and wasteful fuel use leading to excessive CO2 emissions. There is no possibility of “sustainable waste management” being achieved with such an approach. Alternative means of achieving the same capacity elsewhere, such as at the Wymington site are not explored.

\* Co-location of facilities together with complementary activities

The landowner's wishes for the site should not influence the assessment of its use for this specific purpose. It is wrong to accept that this will be the eventual use for the site. No planning applications have been made. Wind energy in this area has been proven to be grossly inefficient and very expensive due to low average wind speeds and variability. Bio fuels have been shown to consume arable food crops that are needed to feed the world's population and have doubled the price of grain in a year. The alternative source, palm oil, leads directly to the destruction of forests to accommodate plantations and release of excessive CO2 from land clearing activity and transportation of the product halfway around the world. “Renewable Energy Park” may have a green ring when used, but the reality is likely to be quite different and the owner's proposals should not have any bearing on the handling of the Preferred Site process.

\* Form part of, and serve a growth area.

The site is not in a growth area and is well away from the primary sources of waste. To describe the site as being *“located in close proximity to growth areas in Northamptonshire”* is completely wrong and again displays an apparent anxiety to get the site accepted for development. Presupposing that Bedfordshire would use the site, especially when it already has an anaerobic digester a few miles away and Goosey Lodge within four miles is far from certain and this matter should not be within the remit of a site assessment process for Northamptonshire.

## **Overall Evaluation**

The Overall Evaluation portrays an unwarranted enthusiasm to get the site listed as Preferred irrespective of its characteristics and location. The profound drawbacks of the site in terms of geographical position and damage to the landscape character and environment have been missed, ignored or played down to an extent where the conclusions of the assessment are not viable. The inadequate and misleading Phase 1 assessment should be redrawn in the light of this paper and WA8 withdrawn from further consideration.

It is accepted that Northamptonshire may currently be showing a shortfall in waste management capacity relative to forecasted arisings. However, it should be remembered that the Preferred Site process is limited to locations that owners have put forward for review in the hope that they will be accepted for planning and will generate lucrative revenue streams. The limitations of choosing sites from a limited and random list must not be allowed to interfere with the responsibility of the authority to develop and operate a robust process based on sound planning criteria that considers all matters of environment, landscape, location, sustainability, nuisance, wildlife, transportation etc. The Chelveston site fails dismally to match the key criteria set out in the MWDF document and should be rejected as a Preferred Site on that basis together with the unacceptable level of potential adverse impact upon the local environment, landscape and communities.

Hargrave Conservation Society  
JLB/08.12.07

