

HARGRAVE PARISH COUNCIL

Clerk to the Council:

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30th November 2007

Mr Mark Chant
Planning Policy – Growth Management
Northamptonshire County Council
PO Box 163
County Hall
Northampton
NN1 1AX

Dear Mr Chant,

Minerals Waste Development Framework

At a meeting of Hargrave Parish Council on Monday 5th November 2007 it was decided, after thorough discussion, that site WA8, as defined in your Minerals and Waste Development Framework (MWDF), is totally unsuitable as a sub-regional facility for waste disposal.

Throughout your document there are numerous inconsistencies which cast doubt on its use as a future planning framework document. This letter sets out the views of Hargrave Parish Council on the document itself and on the proposed siting of a sub-regional facility for waste disposal at Chelveston. In our opinion the document conflicts with four of the twelve key principles set out by the Northamptonshire Council Core Strategy.

Objective 2 – Sustainable Minerals and Waste Development in Northamptonshire.

Promote a step change in high quality design-led sustainable development by maximising materials resource efficiency, minimising waste and optimising the use of existing infrastructure networks and previously developed land.

The proposed site has inadequate existing infrastructure to support the volume of heavy goods traffic and supporting vehicular movements associated with the proposed facility (sub-regional) that is designed to accommodate a radius of up to 50 miles. This land has been used for agricultural purposes for the past 60 years. It is also designated as a Green Field Site by East Northamptonshire Council and has been adopted as such in the 3-Towns Plan.

Objective 5 – Spatial Distribution of Waste Development.

Facilitate the delivery of a strategic urban-focussed flexible waste management network which supports the proximity principle, with particular encouragement of integrated waste recovery and treatment facilities.

The proposed location of Chelveston (WA 8) is neither ‘urban focussed,’ nor in ‘close proximity’ to the source of waste. Chelveston is away from the main growth areas shown as the development spine, and even further away from the secondary growth areas listed as

Daventry, Rothwell and Towcester. The site is at the extreme eastern point of the county and therefore could not be further from the development towns.

Objective 10 – Conserving Northamptonshire’s Built and Natural Environment.

Recognise Northamptonshire’s environmental systems and landscape linkages in order to conserve and enhance the built and natural environment through ensuring sensitive working, and where necessary high standards of mitigation of potentially adverse impacts of minerals and waste development.

The proposed site of WA8 is on the top of a high regional plateau and as such will have a detrimental visual impact on a vast area. The proposed site has no modern day development and as such does not impinge on scenic or social enjoyment. From many aspects the landscape in this area is timeless as there is an absence of electricity pylons and other modern structures. There is limited light pollution in the area which adds to the scenic importance of this site in its current form. The night sky in Hargrave is unusually dark for the area and the enjoyment of it would be adversely affected by the light pollution caused by such a development.

Objective 12 – Health and Safety Communities.

Preserve residential amenity, protect the health and safety of communities and promote recreational opportunities associated with minerals and waste development.

The proposed site has many footpaths and bridleways crossing the area. The enjoyment of these facilities would be adversely affected by the proposed development of this site. The inclusion of waste management facilities would create a much higher risk of pollution and have an adverse effect on health and safety in the area. Apart from the enjoyment of the footpaths and bridleways the surrounding rural villages have dwellings close to the site. Seven villages have houses within 1700m of the site the nearest being a mere 550m away.

Spatial Planning Strategy for Waste

Throughout the consultation document the policy framework makes reference to possible coordination with neighbouring counties. However, the detailed analysis of the various sites makes no reference to the catchment areas that would be included if Bedfordshire and Cambridgeshire produced a coordinated strategy. Moreover, this would not be in keeping with the extension of existing waste management sites which are closer to the population centres, and which offer a good logistical network.

Pg 22 Para 3.6 The strong move away from waste disposal to treatment, coupled with the advancements in waste technologies and design, has resulted in waste management facilities being able to be incorporated with other forms of development (ie no longer rural-centred) and can therefore be better linked to where waste is actually generated.

It is our understanding that the sites at Stanion/Brigstock and Lowick all have planning permission for in-vessel composting. None of these sites have developed their permissions. We would therefore argue that these sites are nearer to the urban areas, especially the growth area of Corby. There is, therefore, already spare capacity which is more appropriately sited with other waste management facilities. This fits in with NCC’s policies.

There is clear evidence from the reference that rural locations are no longer necessary for the planned facilities.

Pg 31 para 3.42 *The main urban areas of the county extend from Northampton in the west to Corby in the north-east and encompasses Wellingborough, Rushden/Higham Ferrers, Kettering and also the smaller towns of Irthlingborough, Burton Latimer, Rothwell and Desborough. Significant integrated facilities and advanced treatment facilities should be located within this area, with preliminary facilities within major areas of new development such as urban extensions would also be encouraged. As an emerging sub-regional centre Daventry should be a secondary focus for advanced and preliminary treatment facilities, again with a bias towards industrial areas and urban extensions.*

The proposed site is not consistent with the requirement to locate waste management sites close to, or within, urban areas, using areas of industrial use.

Pg 36 para3.54 The current Waste Local Plan is supportive of landfill sites expanding their role through becoming locations for waste management. However the scale and the type of facility likely to be acceptable are not prescribed. The Local Plan also sets a preference for focussing waste management infrastructure in or around urban areas. Landfill is invariably in rural areas; such as it could be argued that using landfill sites for permanent waste management uses would not support a sustainable distribution pattern.

WA8 is on the extreme eastern tip of the county and outside of any urban areas which makes it difficult to fit into a distribution pattern.

Capacity, Catchment Area and Transport.

Although there is no mention of the proposed capacity at Chelveston (WA8) the forecast for inert recycling capacity in the area in 2016/2025 is circa 1 million tonnes. The WA8 capacity would need to be significantly high. This facility would therefore present a much higher risk in terms of environmental pollution and impact.

The remoteness of the location at WA8 would require waste to be transported a significant distance compared to urban-based sites. The Core Strategy preferred approach to transporting waste is 'waste related development should minimise road-based transport movement and maximises the alternative transport modes'. The proposed site at WA8 is in direct conflict with the Northamptonshire County Council (NCC) Strategy and would require significant infrastructure development. There are no alternative methods of transport available at this site. All the main towns on the Urban Spine namely Northampton, Wellingborough, Kettering and Corby are served by rail links.

The MWDF also reports that 56% of household waste will be recycled by 2019. If this target is met even allowing for growth this must mean a decline in the level of waste to deal with. Also the post 2016 growth forecast is zero, further indicating that waste will decline.

Future Use

It is our opinion that, with current reports on food prices, the shortage of grain and other crops caused by the redirecting of such into fuels, the future of food production should be considered. Land set aside has been reduced to try to alleviate this. WA8 should be maintained in a state to enable it to be returned to food production in the future. Its only use has been agricultural apart from the requisitioning of it for military use.

Government Strategic Policy

Further comparison between the Government's Principle Planning Statement and the NCC Document on Preferred Options shows that there are numerous inconsistencies which must be addressed effectively before the consultation process leads to firm planning guidance.

In particular reference to PPS 22, PPG 2, PPS 10 and PPS 7. These cover various aspects of government policy referring to the planning process. As an example the following areas should be addressed:

PPS 22 Locational and environmental issues are material considerations in the key principles of PPS 22. Development proposals are required to demonstrate how environmental and social impacts are being minimised through careful consideration of location, scale and other matters. **It is not sufficient that a developer has indicated an interest in the site.**

The Companion Guide clearly states that the key concerns are the sources of the waste, the economic and environmental implications of transportation of the waste and the change of use and visual effects of such a change.

In order to minimise the adverse environmental effects of transporting waste, they should, wherever possible, be located close to the waste source.

The Companion Guide PPS22, P106, paras.40/41 *Most acceptable sites are likely to be beside existing industrial or waste water treatment works or, in the case of digestion schemes, using MSW in close proximity to a landfill site or waste transfer station.*

The Companion Guide PPS22, P88, para 38. *Similar principles apply to bio-mass. The need to site plants close to the centre of gravity of the proposed feed stock with proximity to main transport conduits (rail and road).*

The WA8 site does not fit these considerations. Large scale schemes, such as those proposed, are not consistent with all the Government's relevant planning guidance. Such green field sites should be kept as open spaces for future generations to enjoy.

PPS10 *All planning authorities should 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.*

WA8 fails to meet the criteria of "without harming the environment" and being "one of the nearest appropriate installations".

PPS10 also fully recognises the need to minimise wastes and use them as a resource as much as possible. The proposed listing of WA8 is contrary to the overall objective of Government policy. The location is not consistent with the principles and practice of sustainable development as already mentioned. WA8 is also inappropriate when considered with other spatial planning concerns such as transport, housing, economic growth, natural resources and regeneration.

According to the Regional Spatial Strategy, waste planning authorities may work jointly to develop plan documents under PPS10, page 8 para 5 and page 9 para 9. Very little, if any, account has been taken, when proposing the WA8 site, of the capacity of the existing and potential infrastructure to support the movement of waste and products arising from such, and the ability, where practical, to use alternative modes of transport. The site also fails in the planning system controls and development and use of the land in the public interest, and to focus on whether development is an acceptable use of the land and the impacts of those uses on the development and use of the land.

PPS7 This contains a number of underlying objectives; *to raise the quality of life and the environment in rural areas through the promotion of "thriving, inclusive and sustainable*

rural communities ensuring people have different places to live by improving the quality and sustainability of local environments and neighbourhoods; good quality sustainable development that respect and, where possible, enhance local distinctiveness and the intrinsic qualities of the countryside; and 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.”

To promote more sustainable patterns of development; Discouraging the development of green field 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.

A large scale waste management plant at WA8 would be counter to Government policy and counter to the key principles of PPS7

There are many brown field sites offering potential for location of a large scale waste management plant and are far less remote than WA8.

Conclusion

In light of the above, Hargrave Parish Council urges you to reconsider the inclusion of WA8 as a preferred site for waste management.

Yours sincerely,

Ros Sheppard
Clerk to Hargrave Parish Council