



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

10th December 07

Dear Mr Chant,

Preserve has reviewed the Preferred Options Policies document and the accompanying evidence for the site WA8 Chelveston in particular. The proposal is for a large industrial complex that is not related to agriculture. We object to the addition of this site for the following reasons.

Policy

The former Chelveston airfield is an acknowledged Greenfield site. The Three Towns (Rushden, Higham Ferrers, Irthlingborough) Preferred Options document states:

Chelveston Airfield – preferred option “4.113 Due to the naturalisation of the site, it is appropriate to consider the airfield site as Greenfield land. As a result the site would be restricted by national and local planning policies for Greenfield land within the open countryside.”

The shortlisting of the former Chelveston airfield also runs counter to key national policy planning statements subsequently reflected in regional and local planning policy statements with respect to the siting of waste treatment facilities. These are:

National

Planning documents relating to this site are PPS22, PPG2, PPG10 and PPG7. These state locational and environmental issues are material considerations. Specifically,

“In general, waste treatment and disposable operations are characterised to a large extent by the high volume of materials entering and exiting the site. In order to minimise the adverse environmental effects of transporting waste, they should, wherever possible, be located close to the waste source. The optimum locations for most MSW and business waste plants are therefore likely to be in or very close to urban areas” [Companion Guide to PPS22, p106, para 26]

Regional

East Midlands Regional Plan (Draft due for adoption early 2008) Policy 37 p52. With reference to the provision of additional waste management capacity, the following criteria should be taken into account:

*“*proximity to existing or new planned development*

**good transport communications, with preference given to rail or water”*

Regional Priorities for Waste Reduction and Waste management – Southern Sub Area, p51:

“Growth and regeneration in areas such as Northampton, Wellingborough, Kettering and Corby provides opportunities to incorporate more sustainable management for all types of waste...A centralised pattern of fewer larger facilities based around these urban centres is therefore proposed.”

Local

NCC Preferred Options: Spatial Planning Strategy p20ff:

3.3 *“Within the County, growth will be concentrated at the four main population centres: Northampton, Corby, Kettering, and Wellingborough ...”*

3.6 *“The strong move away from waste disposal to treatment...has resulted in waste management facilities being able to be incorporated with other forms of development (i.e. no longer rural) and can therefore be better linked to where the waste is actually generated”*

3.10 *“It is therefore proposed to focus on an urban centred approach for waste management facilities. “*

Locational criteria for local waste management facilities p151/2

3.9 The site does not comply with any of the locational criteria

3.13 (box) The site cannot be described as being “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 or waste management facility.

Traffic

The access to the site is either via an unclassified road, Newton Road, where HGVs have great difficulty passing each other now, or routes which entail passing through Chelveston and/or Caldecott. The output figure of the proposed complex is not specified which makes the ‘assessment’ that the development will generate a *medium* amount of additional vehicle movements and the statement that improvements *may* be required nonsensical. In addition the background figures, obtained from only a **one-hour** survey and carried out in an inappropriate and unrepresentative place, rendered the whole assessment unsound. The survey was conducted at the current entrance to the facility. However, it should have been conducted on the road from the B645 towards the current Carr Brothers installation. This road, which will be the designated route, already carries considerable HGV traffic as the Carr Brothers site contains a haulage firm. The survey finding that there was no HGV traffic is therefore grossly misleading. If the correct figures were available, it would be obvious that this site should not be considered.



We believe the existing road network could not cope with a large increase in HGV movements and the additional service vehicle traffic. In addition, there would be a major problem of safety to drivers, walkers and horse riders. Local villagers are already aware of the risks of this road, and many have reported near misses with HGVs on what is a narrow and winding rural road.

The proposed site has the potential for at least 150,000 tonnes annually (the figure put forward to Bedfordshire County Council by the same developer also on this site). This would require a *minimum* of 10,000 HGV movements annually, a level far beyond the capability of the present infrastructure and contrary to PPS10 para 21 (identifying suitable sites and areas).

Environmental Impact

To assess risk on a reasoned basis for parameters such as noise, odour, visual impact amenity for a waste treatment complex with qualifying reference solely to management (or lack of it) whilst excluding volumes renders its conclusions valueless. The site assessment summary and subsequent risk assessments are essentially flawed.

Present use

The former airfield at Chelveston has been used for grazing cattle and sheep for over forty years. Except for a small single-storey former control building in the centre of the site, the airfield has been cleared of any other structures for many years. The location which is all open grassland is notable for its tranquillity.

Visual

The airfield is situated on a plateau some 75 feet above Chelveston and is visible for many miles around. Any industrial development would be prominent on the skyline and any emissions highlighted. The distances from which the existing box mast can be seen are 10 miles plus.

Amenity

A complex network of public footpaths and bridleways that run across the site complements the Stanwick Lakes development, and many link to or continue as part of the Northamptonshire public rights of way network. This extensive network located in agricultural land is of great value to the communities of Higham and Rushden as well as those adjoining the site. The A6 bypass forms a natural boundary between the urban communities to the West and the 'green space' to the East.

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

- NCC – footpaths MM16 & MM19 and bridleways MM14, MM17 & MM18.
- BCC – footpaths S7, Y17 & Y20 and bridleways BW39,40 & Y18.

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

We disagree with the description that 'the site is not located in a landscape area of local significance'. This does not reflect its true status.

Landscape condition

Contrast the NCC description "moderate with degradation of landscape values associated with the site's use as a former airbase" with BCC's description of it as "part or all of this site is Grade 2, best and most versatile agricultural land. Bedfordshire's assessment is accurate.

Character

Potential impact with Yelden Meadows SSSI, a wetland site whose special features are affected in part by ground water quality and quantity. The site is on the watershed between the River Nene and the River Ouse giving the potential therefore for contamination.

Odour nuisance

Anaerobic Digestion (AD) plants emit obnoxious sulphide related fumes that are particularly nauseous, and as they are heavier than air can travel some distance causing excessive discomfort. This is particularly true of plants treating animal waste. Such odours from the Biogen AD plant near Clapham do cause local concern and related health issues. (These odours are different from those arising from the pig farm). As the site is located at the brow of the hill above Yelden, the nuisance from these 'heavy' odours is likely to be significant.

Noise nuisance

The noise level will certainly increase and be particularly noticeable at night when the background noise levels are close to zero. As the operation is a 24 hour one, the effect of FLT, compressors generators as well as HGV movements will be very noticeable and stressful to a wide range of local communities.

Light nuisance

Because of its position on a high plateau, the effect of widespread neon lighting will be very evident and visible for many miles around.

Heritage

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

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

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



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

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

The site is located close to the surrounding rural villages of

Yelden - 900m (to nearest dwelling)

Shelton -1,950m (to nearest dwelling)

Hargrave -1,950m (to nearest dwelling)

Chelveston - 880m (to nearest dwelling)

Caldecott -780m (to nearest dwelling)

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

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

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

This operation will be a continuous 24-hour one so all the negative impacts mentioned above such as visual (structures and light pollution), noise, smell and vermin are certainly not 'negligible'

Cumulative Impact

You will be aware of waste treatment plants currently operating (with environmental hazards and nuisance) at Goosey Lodge, Wymington and Twinwoods at Clapham. In addition, there is a proposed site at Westwood for a 45,000 tpa AD complex only 3 miles from the Chelveston site. It is near the A6 on the county border (Grid reference SP E9889N6323). Whilst the application has been withdrawn currently, we are advised that it will be resubmitted shortly. The WA8 is directly adjacent to site WSD33 in the BCC's MWDF Preferred Options long list. As the developer has provided the same information to both County Councils, there is also a potential for 150,000 tpa on this site too.

This represents an excessive concentration of waste treatment plants within such a small area. The WA13 site of 55Ha would seem a far more logical position.

Planning Policy Review

We refer to the highlighted sections of the report on p184 & 185, which sadly read more like a marketing document than an objective assessment. In the 'overall evaluation' box; it states the site situated on the Northants/Beds border *"has the potential to serve growth on a sub regional basis"* and that it has *"the potential for co-location with other forms of development on the site"*.

In the consistency with the emerging Core Strategy box, it states *"The site is situated to the east of Rushden and is likely to serve a sub-regional catchment area with a focus on the urban spine, thereby reducing the transport of waste from its origin. **On this basis this site is not seen to be in conflict with emerging spatial strategy for waste management.**"* (my highlighting).

We believe it does. The critical point to be made is that the Chelveston site is outside the urban spine, main or sub-regional. Rushden is a smaller town not scheduled for any significant expansion. (Three Towns Preferred Options). In the regional Spatial Strategy for the East Midlands (RSS8) and the core strategy for North Northamptonshire 'a modest level of growth' is recommended. Wellingborough however is scheduled for significant growth and thus shifts the 'weighted' centre of population (and in fact the existing generation of waste from superstores) to a Wellingborough, Rushden, Kettering triangle. We are also not aware of any substantial growth in rural North Beds either. The comment therefore that being 'situated on the Beds/Northants border reducing transport waste' is certainly not valid.

This brings the argument back to the basic strategy outlined in the report namely that the geographical location of waste treatment facilities should be governed by the County urban spine. In more detail, 3.45 refers to three locations for 'a significant integrated waste management facility.' The one to cover the *central* part of the county *"should be in an area **bounded** by Kettering, Wellingborough and Rushden/Higham Ferrers"* (my highlighting). The Chelveston site clearly does not



comply with the letter or spirit of the 'proximity principle' in that respect, and the argument for the need to serve local waste in that location is also not proven.

General comments on the report

We would challenge much of the risk assessment/sensitivity analysis. It is based on a site the capacity of which can vary widely and we believe the majority of the risks are size related. In addition, the report also states that *"there is also potential for co-location with other forms of development on the siteAny identified impacts can be managed through the use of mitigation techniques."* We refute the suggestion that mitigation techniques can combat an unknown development of this kind and magnitude. We also query the fact that its inclusion indicates an implied advantage to the site, signalling some sort of approval (despite the rather vague disclaimer). If the original plans for the development of the site, as outlined in CRE's initial proposal and reconfirmed in the proposal for the Bedfordshire side of the site, are real potential options, **this should be made clear. The rescue clause WA8.7 is not good enough.**

Summary

The proposal to site this industrial complex at Chelveston is contrary to a range of policies, specifically its location being far from the sources of the waste to be treated. The transport infrastructure is totally inadequate and a reasoned assessment is pivotal. The site is an acknowledged Greenfield site and this industrial complex will impact negatively on the natural habitat, as well as generating an intolerable level of emission and nuisance. The proposed allocation of this site fails Test 6 (Conformity for Soundness). The allocation is not consistent with the proposed Core Strategy. It also fails Test 7 as the process so far is not based upon a robust and credible base.

Yours sincerely,

PW Mommersteeg
Chairman