



## **PLANNING SUPPORTING STATEMENT**

**The relocation of aggregate recycling uses from Boughton Waste Site (former Boughton Quarry) to the site of Phase 1 Pitsford Quarry**

**AT LAND AT PITSFORD QUARRY, NORTHAMPTONSHIRE**

**APRIL 2021**



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### **Plans**

PBL-006-M.D.001 – Location Plan

GPP-PB-PR-13-05 Rev 1 – Pitsford Quarry ROMP – Phasing Plan

GPP-PB-PR-13-02 Rev 3 – Pitsford Quarry – ROMP Review Plan

### **Appendices**

Appendix A – Ecological Management Plan (Heatons, 2020)

Appendix B – Transport Assessment (Aecom, 2021)

Appendix C – 13/00001/WASFUL Decision Notice

Appendix D – Noise Mitigation Strategy (Heatons, 2021)

Appendix E – Flood Risk Assessment (Abington Consulting Engineers, 2012)

# 1 Introduction and Background to Proposal

## 1.1 Purpose of this Report

- 1.1.1 This document is the Planning Statement (PS), prepared on behalf of Peter Bennie Ltd (The Applicant), which accompanies a planning application seeking the relocation of aggregate recycling uses from Boughton Waste Site (former Boughton Quarry) to Pitsford Quarry. Both sites are within the control of the Applicant.
- 1.1.2 Subject to permission for the relocation of the aggregate recycling facility, the existing waste recycling operations at Boughton Quarry, permitted and controlled under application reference 12/000015/WAS, are proposed to cease. An application for cessation of waste recycling and the removal of existing steel portal sheds to facilitate extraction of remaining mineral and restoration of Boughton Waste Facility is being submitted in conjunction with this application.
- 1.1.3 The existing facility is used to recycle non-hazardous and inert waste materials. Relocation of the existing waste recycling facility from Boughton Quarry to Pitsford Quarry will enable the continuation of sustainable waste recycling operations within the locality at an existing mineral site. The consolidation of minerals and waste activities to a single location has operational and economic benefits to the Applicant.
- 1.1.4 This Planning Statement supports the planning application by outlining the proposals and considering the potential for environmental and local amenity impacts as a result of the proposed development.
- 1.1.5 This Planning Statement is accompanied by the following technical assessments:
- Ecological Management Plan (Appendix A)
  - Transport Assessment (Appendix B)
- 1.1.6 The findings of the above are summarised in section 7 of this report along with the consideration of the following environmental effects:
- Dust / Air Quality
  - Noise
  - Flood Risk

## 1.2 The Applicant

- 1.2.1 The Bennie Group business was founded in 1942 and has evolved into one of the Midlands largest independent quarrying companies. Peter Bennie Ltd is a major part of The Bennie Group and is based at Burton Latimer south of Kettering.
- 1.2.2 The business is renowned for quality of service and products, technical expertise and knowledge. This expertise is not only in the production process but also in health, safety and environmental management which is a critical factor for its own operations and those of major clients.
- 1.2.3 The construction industry is at the core of the business from start to finish. From the extraction of minerals from the quarries to the supply of equipment, machinery and haulage and then to the restoration of quarries with inert materials. In addition to this Peter Bennie are also involved in associated downstream activities such as dimension and building stone.
- 1.2.4 Peter Bennie operate two additional mineral and waste sites in proximity to Pitsford Quarry at Harlestone Quarry and Boughton Waste/Recycling Facility. They also operate the Wood Lane Landfill site in the south of the County.

## 2 Site Background and Planning History

### Pitsford, Boughton and Harlestone Quarries

- 2.1.1 Mineral Extraction (ironstone) at Pitsford Quarry has been taking place since the original consent was granted in 1953. A ROMP submission to consolidate minerals and waste operations on land at Boughton-Pitsford-Moulton was submitted to Northamptonshire County Council (NCC) and approved in April 2015 (Ref. 14/00057/MINFUL). The permission enables the extraction of ironstone within Phase 1 of Pitsford Quarry with an end date of 2042. The site is controlled by a set of up to date planning conditions which were submitted and approved as part of the ROMP (Ref. 14/00057/MINFUL). A plan outlining the site of permitted mineral extraction (Phase 1) at Pitsford Quarry is enclosed at plan reference GPP/PB/PR/13/09 REV 1.
- 2.1.2 Permission for a revised restoration scheme involving inert waste and a temporary inert waste recycling facility at Pitsford Quarry was approved in December 2013 (Ref. 13/00001/WASFUL). The revised restoration consisted of infilling the existing Pitsford Pond and creation of agricultural land for arable use. The temporary recycling operations were intended to replace those currently in operation at the Harlestone Quarry, for the 3 year period required to complete the restoration of Pitsford Pond. The development was not implemented and thus the permission has lapsed.
- 2.1.3 The Pitsford Quarry site had been inactive up until 2020 with only the working and processing of existing stockpiles taking place.
- 2.1.4 It is the intention of the Applicant that an application to extract mineral within subsequent phases (2-5) of Pitsford Quarry, as outlined on plan reference GPP-PB-PR-13-02 Rev 3, will be prepared and submitted in due course. In accordance with the requirements of permission reference 14/00057/MINFUL, an up to date schedule of conditions accompanied by environmental assessment work will be submitted for approval by the MPA.
- 2.1.5 The site is closely associated with waste (and former mineral) operations at the nearby Boughton Recycling Facility, formerly Boughton Quarry. Boughton Recycling Facility has a permanent permission for the recycling of non-hazardous wastes (excluding food wastes), importation and processing of minerals for bagged aggregates and loam, recycling of inert waste materials and K-Lime (cement production waste)

processing within the recycling shed and currently operates under planning permission 12/000015/WAS which was granted permission on the 28<sup>th</sup> May 2012. Boughton Waste Facility is also owned and operated by the Applicant. An application for cessation of waste operations, infilling of the existing void space is being submitted in conjunction with this application to relocate the existing inert waste recycling facility to Pitsford Quarry.

#### The Old Brickworks, Pitsford

- 2.1.6 The Old Brickworks off Harborough Road, Pitsford is located ca. 1.6 km north west of the quarry site. Part of the Old Brickworks site has operated as a waste transfer station sorting facility for construction and demolition waste since 2003 under permission reference DA/03/280C. Permission for a change of use of the entire site from industrial premises to waste transfer and recycling was granted in October 2009 (Ref. 09/00054/WA). Permission to extend the hours of working was granted in September 2013 under application references 13/00051/WASFUL, 13/00050/WASFUL and 13/00049/WASFUL).

#### Buckton Fields, Boughton

- 2.1.7 Buckton Fields site is located ca. 100m south of the Applicants existing recycling facility at Boughton Quarry. Permission for a mixed-use masterplan development at Buckton Fields comprising 1050 dwellings, employment land, a residential care home, park and ride facility, a local centre, primary school, public open space and associated highways and drainage infrastructure was granted in November 2018 (Ref. DA/2011/0666). The development has been built out and is now occupied.

## **2.2 Pre-Application Advice**

- 2.2.1 The Applicant has sought pre-application advice from NCC in a letter dated 4<sup>th</sup> August 2020. The Pre-Application response from NCC stated that the proposed development was considered to be a complimentary use to the existing quarry operation.
- 2.2.2 NCC confirmed that, in principle, no issues relating to an inert waste recycling facility at Pitsford were foreseen and it was confirmed that the approach set out in the submitted pre-application advice request covered the key considerations.

### 3 Site Location and Setting

#### 3.1 Site Location

- 3.1.1 The application site extends ca. 3.08 ha and is situated within 'Phase 1' of Pitsford Quarry with associated access up to the A508 Harborough Road. The site is located within the jurisdiction of Daventry District Council (DCC) and Northamptonshire County Council (NCC).
- 3.1.2 The site lies ca. 6km north of the centre of Northampton. The A508 Link Road between Northampton and Market Harborough runs approximately 480m west of the Phase 1 site compound. The site location is shown on plan reference PBL-006-M.D.001.
- 3.1.3 The site has a sole access/egress point off the A508 Harborough Road ca. 480m west of the Phase 1 site compound. Movement through the site is facilitated by an internal road.

#### 3.2 Site Setting

- 3.2.1 The immediate setting of the application site is defined by Pitsford Quarry, which is currently operational within Phase 1. Restored agricultural land borders the site to the north and south. Moulton Road lies to the east of the site and the A508 borders the site to the west. Further afield, the site is otherwise largely surrounded by agricultural land.
- 3.2.2 The A508 is part of Northamptonshire's Strategic Freight Network and connects the site with the A14 at Kelmarsch (to the north) and the A45 at the junction with the A428 (to the south). The A45 connects the site to the M1 at junction 15.
- 3.2.3 The site is surrounded by the villages of Pitsford (north), Moulton (east) and Boughton (south). Moulton Road provides the link road between Pitsford and Moulton villages. There are a number of isolated residential properties included within the area of the old mineral planning permission, some of which are Listed Buildings Grade II. The closest residential receptors to the proposed site of the recycling facility are:
- The Oaks – ca. 180m north of Phase 1 Pitsford Quarry
  - Fox Covert Hall – ca. 230m south west of Phase 1 Pitsford Quarry
  - 2 Aerial View – ca. 380m north west of Phase 1 Pitsford Quarry

- Bunkers Hill Farm complex – ca. 420m south east of Phase 1 Pitsford Quarry
- Home Farm Lane complex – ca. 540m north west of Phase 1 Pitsford Quarry
- Residential Properties along Butchers Lane – ca. 615m south of Phase 1 Pitsford Quarry

3.2.4 South of the village of Pitsford there is a large area of Community Woodland, planted in 2001, all within the ownership of Peter Bennie Ltd and known as 'T's Wood'. The Community Woodland is shown on plan reference GPP-PB-PR-13-02 Rev 3. T's Wood was designated as a Local Wildlife Site in 2011 by the Wildlife Trust which is a non-statutory designation. There is also a Local Geological Site within the north-east of the Pitsford Quarry area.

3.2.5 Pitsford Water Site of Special Scientific Interest (SSSI) and Country Park lies 2km to the north of the site.

3.2.6 Boughton Park, which is Grade II listed on the Register of Historic Parks and Gardens, lies partly within the ROMP permission boundary and extends approximately 400m to the south. Some of the Follies of Boughton Park lie within the ROMP permission boundary and others lie nearby; all are Listed Grade II.

3.2.7 Footpath CC2/DK3 runs along the eastern boundary of Phase 1.

## 4 Description of Development

### 4.1 Introduction

4.1.1 This application seeks permission for a recycling facility to sort and screen imported non-hazardous inert waste material. This facility would replace the existing non-hazardous inert waste recycling operations at Boughton Quarry. An application for cessation of waste operations and relocation of the existing waste recycling facility from Boughton Quarry to Pitsford Quarry is being submitted in conjunction with this application.

4.1.2 It is the intention of the Applicant that an application to extract mineral within subsequent phases of Pitsford Quarry, as outlined on plan reference GPP/PB/PR/13/05 REV 1, will be submitted in due course. The recycling facility would therefore be operated in conjunction with, and complimentary to, existing approved mineral operations in Phase 1 of Pitsford Quarry, and future mineral working within subsequent phases.

4.1.3 An application for a temporary inert waste recycling facility at the site of Pitsford Quarry has previously been granted, albeit the permission (Ref. 13/00001/WASFUL) was not implemented and has since expired. This former permission (Ref. 13/00001/WASFUL) enabled the screening, crushing, stockpiling and disposal or recovery of non-hazardous inert waste. This planning application seeks permission for the screening, crushing, stockpiling and recovery of non-hazardous inert waste.

4.1.4 The working methods set out in this chapter have been prepared in accordance with the parameters set out in the previous permission (Ref. 13/00001/WASFUL).

### 4.2 Outline of the Working Methods

4.2.1 The recycling operations are intended to replace those currently in operation at Boughton Quarry. It is expected that up to 75,000 tonnes per annum of clean inert materials from construction and demolition operations will be imported to the site.

4.2.2 All material imported will first be inspected at the existing site office and weighbridge. A stringent process of inspection at the site office guarantees that approved materials are bought on site in accordance with the requirements of the Environmental Permit.

- 4.2.3 The recycling of inert materials does not require processing within a building. In addition, there is no requirement for a concrete slab/hardstanding. Any material imported which does not meet the criteria for importation and processing will be turned away or stored securely (in containers) on areas of existing hardstanding close to the site office and weighbridge.
- 4.2.4 Vehicles will use existing internal haul roads to access the site where the materials will be off loaded and stockpiled to await being processed.
- 4.2.5 Aggregate recycling will be undertaken on a campaign basis (from stockpiles of approximately 2000 tonnes and no more than 3 metres in height) utilising a mobile crusher which is already situated on site. All processed materials will be exported from the site. There will be no disposal of waste product.
- 4.2.6 Recycled materials will be stockpiled again until there is sufficient processed recycled aggregate for loading onto HGV's for export. A loading shovel will be used to move imported and recycled product.
- 4.2.7 It is proposed that recycled aggregate will be removed from the site through backloading the HGV's used to deliver the inert material to the site or those intending to leave with aggregate. This is considered to minimise the combined traffic generated by the mineral and waste activities.
- 4.2.8 It is unlikely that recycling operations will take place everyday. The Applicant will stockpile inert material before undertaking recycling operations. This will mean that the crushing operations are intermittent throughout the lifetime of the facility which will significantly reduce the impacts of noise and dust on the nearby sensitive receptors.

### **4.3 Recycling facility and Traffic Management Details**

- 4.3.1 The recycling facility is to be located within the Phase 1 extraction area. The recycling facility consists of a processing plant/crusher, screen and a loading shovel.
- 4.3.2 The site access and internal vehicle routeing through the site will mirror that used by the approved mineral operations.
- 4.3.3 In order to provide an equivalent replacement for the recycling operations currently taking place at Boughton Quarry recycling facility, the proposed development will result in an increase in vehicle movements to that solely generated by the mineral extraction

activities. A Transport Assessment (TA) has been prepared which has assessed the impact of up to 600 HGV movements per week as a worst case scenario. The TA is enclosed at Appendix B. The TA finds no unacceptable highways impacts.

#### **4.4 Operating Hours**

4.4.1 Condition 23 controlling the mineral activities (extraction and restoration – permission reference 14/00057/MINFUL) limits the operating hours to:

- *07.00 to 18.00 hours Mondays to Fridays*
- *08.00 to 13.00 on Saturdays*

*No works on Sundays, public or bank holidays.*

*In addition, no soil stripping, bund formation or screening and crushing of inert waste shall be carried out on the site on Saturdays.*

4.4.2 The aggregate recycling operations will be carried out within the above operating hours.

#### **4.5 Employment**

4.5.1 The existing recycling facility at Boughton Quarry provides 3 jobs. Due to the close proximity of Boughton and Pitsford Quarry sites, it is considered that these employees will be able to relocate with the recycling facility.

4.5.2 The waste operations also rely upon support from local outside contractors employed by the Applicant in roles such as haulage. The proposed development would sustain the existing employment levels required to operate the Recycling Facility and secure these jobs for the lifetime of the Recycling Facility.

#### **4.6 Existing Environmental Controls**

4.6.1 Under existing Planning Permission (14/00057/MINFUL controlling mineral working) there are a number of conditions which control/ limit the potential for adverse environmental impact arising from the current workings at the site. There were also controls imposed on the temporary operations (13/00001/WAS). Existing controls will be used to manage the potential for adverse environmental impacts from the proposed development.

4.6.2 Good monitoring practices are already in place to ensure operations do not give rise to adverse dust or noise impact.

## 5 Planning Policy

### 5.1 Introduction

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that determination by the relevant MPA, in this instance, NCC, must be made in accordance with the Development Plan unless material considerations indicate otherwise.

5.1.2 In reaching a decision on this application the first consideration is therefore whether the proposals accord with the Development Plan. Having done this, it is then necessary to have regard to all other material considerations, which include all relevant policy considerations contained in the emerging Development Plan as well as National Planning Policy and guidance.

5.1.3 This firstly details policies within the Northamptonshire MLP. It will then set out policies within the West Northamptonshire Joint Core Strategy, saved policies of the Daventry Local Plan and the NPPF. Pitsford Quarry is under the administrative boundary of DDC.

5.1.4 The Development Plan consists of the following documents:

- Northamptonshire Minerals and Waste Local Plan 2011-2031 (Adopted in 2017)
- The West Northamptonshire Joint Core Strategy Local Plan (Part 1) (Adopted in 2014)
- Daventry Settlements and Countryside Local Plan (Part 2) 2011-2029 (Adopted In 2020)

5.1.5 Other material planning policy documents and guidance considered to be of relevance to the determination of this application include:

- The National Planning Policy Framework (updated February 2019);
- National Planning Policy Guidance;
- Northamptonshire's Minerals and Waste Monitoring Report 2018

5.1.6 This chapter focuses on the planning policy considerations most relevant to the proposal and aims to provide reasoned justification for granting planning permission.

5.1.7 An overview of the policies and guidance of particular pertinence to the determination of this planning application is provided below.

## 5.2 The Development Plan

### Northamptonshire Minerals and Waste Local Plan 2011-2031

5.2.1 The Minerals and Waste Local Plan was adopted on 1 July 2017 and sets out principles of development throughout NCC. The Local Plan is applicable to all proposals for minerals and waste related development. The policies should be read in conjunction with national planning policy and legislation as well as European legislation.

#### Policy 8 - Development criteria for secondary and recycled aggregate processing facilities

5.2.2 Policy 8 states that proposals for the development of facilities for the handling, storage and processing of secondary and recycled aggregate materials (including inert recycling and inert CD&E wastes) should not conflict with the spatial strategy for waste management. Development of temporary aggregate recycling facilities will be permitted at mineral extraction sites with processing capacity.

#### Policy 10 - Northamptonshire's waste management capacity

5.2.3 Policy 10 sets out the indicative capacity requirement for waste management methods during the plan period. The table is set out below:

Hierarchy Level	Management method	Indicative capacity requirement (million tonnes per annum)	
		2021	2031
Preparing for re-use and recycling	Recycling (non-inert)	0.26	0.28
	Composting and anaerobic digestion	0.17	0.19
	Inert recycling	0.74	0.74
	Hazardous recycling	0.02	0.02
Other recovery	Advanced treatment	0.86	0.92
	Hazardous treatment	0.01	0.01

	Inert recovery / landfill	0.16	0.16
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5.2.4 This provision will come from a mix of extensions to existing sites, intensification or redevelopment of existing sites and new sites, providing they all meet the spatial strategy for waste management and are assessed as meeting environmental, amenity and other requirements. Allocations for waste development will also contribute to meeting this provision.

Policy 11 - Spatial strategy for waste management

5.2.5 Policy 11 states that Northamptonshire's waste management network, particularly advanced treatment facilities with a sub-regional or wider catchment, will be focused within the central spine and the sub-regional centre of Daventry.

Policy 16 - Development criteria for inert waste disposal and recovery

Policy 16 states that proposals for the disposal or recovery of inert waste, where this does not relate to the restoration of a committed or allocated site for minerals extraction, must demonstrate that:

- it will not prejudice the restoration of mineral sites, and
- there is clear engineering, agricultural, landscape or recreation amenity justification for the development

Policy 18 - Addressing the impact of proposed minerals and waste development

5.2.6 Policy 18 states that proposals for minerals and waste development must demonstrate that the following matters have been considered and addressed:

- protecting Northamptonshire's natural resources and key environmental designations (including heritage assets),
- avoiding and / or minimising potentially adverse impacts to an acceptable level, specifically addressing air emissions (including dust), odour, bioaerosols, noise and vibration, slope stability, vermin and pests, birdstrike, litter, land use conflict and cumulative impact,
- impacts on flood risk as well as the flow and quantity of surface and groundwater,

- ensuring built development is of a design and layout that has regard to its visual appearance in the context of the defining characteristics of the local area,
- ensuring access is sustainable, safe and environmentally acceptable, and
- ensuring that local amenity is protected.

5.2.7 Where applicable a site-specific management plan should be developed to ensure the implementation and maintenance of mitigation measures throughout construction, operation, decommissioning and restoration works.

#### Policy 21 - Landscape character

5.2.8 Policy 21 seeks to ensure that minerals and waste development reflect's Northamptonshire's landscape character. Development should mitigate potentially adverse impacts on the local character and distinctiveness of Northamptonshire's landscape where necessary during the development, operational life, restoration, aftercare and after-use. Opportunities for enhancement should be maximised through restoration, aftercare and after-use.

#### Policy 22 - Historic environment

5.2.9 Policy 22 states that where heritage assets are identified, proposals should seek to conserve and enhance Northamptonshire's historic environment through:

- careful management of heritage assets, their significance and setting, including the avoidance and / or mitigation of potentially adverse impacts, and
- enhancement of specific features of the historic environment, including individual heritage assets or historic landscapes, as part of the restoration scheme.

#### Policy 23 - Layout and design quality

5.2.10 Policy 23 states that the layout and overall appearance of waste management facilities, and where appropriate minerals development, will be required to demonstrate that the development:

- supports local identity and relates well to neighbouring sites and buildings,

- is set in the context of the area in which it is to be sited in a manner that enhances the overall townscape, landscape or streetscape (as appropriate),
- utilises local building materials as appropriate,
- incorporates specific elements of visual interest,
- builds-in safety and security, and
- reduces fire risk on waste management and disposal sites, having regard to relevant guidance.

#### Policy 24 - Restoration and after-use

5.2.11 Policy 24 states that all minerals and waste related development of a temporary nature must ensure that the site is progressively restored to an acceptable condition and stable landform.

#### Policy 25 - Implementation

5.2.12 Policy 25 seeks to ensure that the implementation of minerals and waste development is controlled and managed through the use of the following measures:

- planning conditions,
- planning obligations and / or legal agreements to: o ensure that requirements are met (but only where the use of planning conditions alone is not adequate), and / or o provide benefits to compensate the local community affected by the development (where appropriate),
- requirements by the owner and / or operator to monitor minerals extracted and waste managed, including information on catchments, and to provide summaries of this information to the Minerals and Waste Planning Authority,
- monitoring of permitted operations by the planning authority to ensure compliance with planning conditions,
- establishment of a Local Liaison Group (where appropriate), and

- service of prohibition orders at minerals sites where winning and working has not been carried out for at least two years and where, in the planning authority's opinion, working is unlikely to be resumed.

#### Policy 27 - Co-location of waste management facilities with new development

- 5.2.13 Policy 27 states that areas of significant new development should be related to a neighbourhood scale waste management facility that either forms part of, or serves this new development. Neighbourhood waste management facilities that would serve existing development will also be encouraged.

#### Policy 28 - Minerals Safeguarding Areas

- 5.2.14 Mineral resources of economic importance will be safeguarded from sterilisation by incompatible non-mineral development through the designation of Minerals Safeguarding Areas.

#### Policy 29 - Safeguarding minerals and waste related development from alternative uses

- 5.2.15 Policy 29 seeks to ensure that existing sites and sites with either permission for or allocated for waste-related development or minerals processing are safeguarded from non-waste and non-minerals related development uses unless alternative provision in the vicinity can be made, or if it can be clearly demonstrated that there is no longer a need for a waste management, or minerals processing facility, at that location.

#### Policy 30 - Preventing land use conflict

- 5.2.16 Policy 30 states that proposals for new development adjacent or in close proximity to committed or allocated minerals or waste related development (including associated rail head / links, wharfage, minerals storage / processing facilities and sewage treatment works) should only be permitted where it can be demonstrated that it would not adversely affect the continued operation of the facility or prevent or prejudice the use of the site.

#### **The West Northamptonshire Joint Core Strategy Local Plan (Part 1)**

- 5.2.17 The West Northamptonshire Joint Core Strategy Local Plan (Part 1) was adopted on 15 December 2014. The Joint Core Strategy designates the site as green wedge. There is

also a large Sustainable Urban Extension proposed to the south of the proposed extension area, north of Sandy Lane.

- 5.2.18 The West Northamptonshire Joint Core Strategy Local Plan (Part 1) sets out a strategy for the area of Daventry District, Northampton Borough and South Northamptonshire Councils for the plan period up to 2029.

Policy SA - Presumption in favour of sustainable development

- 5.2.19 Policy SA reflects national planning policy framework and seeks to ensure that the relevant council takes a positive approach when considering development proposals.

The council will always work proactively with applicants jointly to find solutions which mean that proposals for sustainable development will be approved and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this local plan (and, where relevant, with policies in other local plans and neighbourhood plans) will be approved without delay, unless material considerations indicate.

Policy S1 - The Distribution of Development

- 5.2.20 Development and economic activity will be distributed on the following basis:
- development will be concentrated primarily in and adjoining the principal urban area of Northampton
  - appropriate development of a lesser scale will be located in and adjoining the sub-regional centre of Daventry town
  - the development needs of the rural service centres of Towcester and Brackley and the rural areas will also be provided for
  - new development in the rural areas will be limited with the emphasis being on:
    - enhancing and maintaining the distinctive character and vitality of rural communities;
    - shortening journeys and facilitating access to jobs and services;
    - strengthening rural enterprise and linkages between settlements and their hinterlands; and

- respecting the quality of tranquillity.

#### Policy S6 - Monitoring and Review

5.2.21 Policies in the joint core strategy will be monitored to support implementation and the delivery on the plan's aims and objectives. Contingency for policies in the joint core strategy is provided through the monitoring framework.

5.2.22 The principal mechanism for reporting delivery will be through the joint authorities' monitoring report. The critical areas that will be monitored include:

- the completion of serviced employment floorspace, the creation of jobs and the availability of land for employment use in the future;
- housing completions by location and type and the availability of land for housing in the future measured against the objectively assessed need;
- the delivery of floorspace to support retail, community and healthcare land-use;
- the delivery of major infrastructure projects and provision of financial contributions towards such schemes; and
- the protection, enhancement and creation of assets in the natural environment.

#### Policy S7 - Provision of Jobs

5.2.23 Policy S7 states that provision will be made for a minimum net increase of 28,500 jobs in the period 2008 – 2029 in order to maintain a broad balance between homes and jobs and to maintain a diverse economic base.

#### Policy S10 - Sustainable Development Principles

5.2.24 Development will:

- achieve the highest standards of sustainable design incorporating safety and security considerations and a strong sense of place;
- be designed to improve environmental performance, energy efficiency and adapt to changes of use and a changing climate over its lifetime;
- make use of sustainably sourced materials;

- minimise resource demand and the generation of waste and maximise opportunities for reuse and recycling;
- be located where services and facilities can be easily accessed by walking, cycling or public transport;
- maximise use of solar gain, passive heating and cooling, natural light and ventilation using site layout and building design;
- maximise the generation of its energy needs from decentralised and renewable or low carbon sources;
- maximise water efficiency and promote sustainable drainage;
- protect, conserve and enhance the natural and built environment and heritage assets and their settings;
- promote the creation of green infrastructure networks, enhance biodiversity and reduce the fragmentation of habitats; and
- minimise pollution from noise, air and run off.

#### Policy S11- Low Carbon and Renewable Energy

5.2.25 Major development and sustainable urban extensions should contribute to reductions in carbon emissions and adapt to the effects of climate change through the sustainable development principles (policy s10), so as to minimise energy using sustainable design and construction, maximise energy efficiency and the provision of low carbon and renewable energy, including where feasible and appropriate, through provision of decentralised energy. Proposals should be sensitively located and designed to minimise potential adverse impacts on people, the natural environment, biodiversity, historic assets and should mitigate pollution. In addition, the location of wind energy proposals should have no significant adverse impact on amenity, landscape character and access and provide for the removal of the facilities and reinstatement at the end of operations.

#### Policy BN1- Green Infrastructure Connections

5.2.26 Green infrastructure corridors of sub-regional and local importance as set out in figure 6 of the joint core strategy will be recognised for their important contribution to sense

of place and conserved, managed and enhanced by: 1) incorporating existing and identified future networks into new development proposals; 2) securing contributions from development or other sources for the creation of and future management of the green infrastructure networks; 3) delivering long term management strategies for the sub-regional and local network.

#### Policy BN2- Biodiversity

5.2.27 Development that will maintain and enhance existing designations and assets or deliver a net gain in biodiversity will be supported. Development that has the potential to harm sites of ecological importance will be subject to an ecological assessment and required to demonstrate:

- the methods used to conserve biodiversity in its design and construction and operation;
- how habitat conservation, enhancement and creation can be achieved through linking habitats;
- how designated sites, protected species and priority habitats will be safeguarded.

#### Policy BN5- The Historic Environment and Landscape

5.2.28 Designated and non-designated heritage assets and their settings and landscapes will be conserved and enhanced in recognition of their individual and cumulative significance and contribution to west Northamptonshire's local distinctiveness and sense of place. In environments where valued heritage assets are at risk, the asset and its setting will be appropriately conserved and managed.

#### Policy BN7- Flood Risk

5.2.29 Development proposals will comply with flood risk assessment and management requirements set out in the national planning policy framework and planning practice guidance and the West Northamptonshire strategic flood risk assessments to address current and future flood risks with appropriate climate change allowances.

5.2.30 A sequential approach will be applied to all proposals for development in order to direct development to areas at the lowest probability of flooding unless it has met the

requirements of the sequential test and the exception test as set out within Table 6 (page 128 – exception tests).

- 5.2.31 All new development, including regeneration proposals, will need to demonstrate that there is no increased risk of flooding to existing properties, and proposed development is (or can be) safe and shall seek to improve existing flood risk management.
- 5.2.32 All proposals for development of 1 hectare or above in flood zone 1 and for development in 2, 3a or 3b must be accompanied by a flood risk assessment that sets out the mitigation measures for the site and agreed with the relevant authority.
- 5.2.33 A flood risk assessment must also accompany proposals where it may be subject to other sources, and forms, of flooding or where other bodies have indicated that there may be drainage problems.

#### Policy BN9- Planning for Pollution Control

- 5.2.34 Proposals for new development which are likely to cause pollution or likely to result in exposure to sources of pollution or risks to safety will need to demonstrate that they provide opportunities to minimise and where possible reduce pollution issues that are a barrier to achieving sustainable development and healthy communities including:
- maintaining and improving air quality, particularly in poor air quality areas, in accordance with national air quality standards and best practice;
  - protecting and improving surface and groundwater water quality;
  - minimising light pollution;
  - ensuring remediation of contaminated land so as not to pose a risk to health and the environment; and
  - reducing the adverse impacts of noise.

#### Policy Inf1 - approach to infrastructure delivery

- 5.2.35 New development will be supported by, and provide good access to, infrastructure, including physical, green and social elements. It will integrate with and complement adjoining communities.

## **Daventry Settlements and Countryside Local Plan (Part 2) 2011-2029**

5.2.36 The Part 2 Settlements and Countryside Local Plan for Daventry District 2011-2029 was adopted at a meeting of the Full Council (DDC) on 20th February 2020. The Part 2 Local Plan (2011-2029) follows on from the West Northamptonshire Joint Core Strategy (WNJCS) and provides further guidance on planning decisions.

5.2.37 The site is shown on the Northampton Fringe Inset Map. The proposals map illustrates the Local Wildlife Site designation at T's Wood. Bordering the site to the south are Boughton Conservation Area and Historic Park and Garden designations.

### Policy RA6 - Open Countryside

5.2.38 Policy RA6 aims to protect the intrinsic character, beauty and tranquillity of the open countryside. Therefore, outside the confines of villages, only the forms of development listed within the policy will be supported which does not include minerals or waste development.

### Policy EN1 – Landscape

5.2.39 Supports proposals that maintain the character and quality of the District's landscapes and encourages development to be sympathetically designed. Proposals should include, appropriate to their scale, use and location, an assessment of the likely visual impacts of the proposal.

### Policy ENV2 - Special Landscape Areas

5.2.40 Aims to protect the District's areas of high-quality landscape which are designated as Special Landscape Areas. Thus, the council will resist proposals that would have a harmful effect on them. The policy details that where applications will affect a Special Landscape Area, applicants will be required to evidence appropriate assessment and mitigation.

### Policy ENV5 – Biodiversity

5.2.41 Seeks to conserve and enhance designated areas and species of national and local importance for biodiversity and geodiversity. Thus, all proposals are expected to assess their impact through an ecological assessment and include details of mitigation or compensation where harm may be caused. Proposals should also seek to achieve a net gain for biodiversity.

### Policy EN7 – Historic Environment

- 5.2.42 Aims to conserve and enhance the historic environment of the District. The policy requires proposals affecting heritage assets to demonstrate a clear understanding of the significance of the asset and its setting, and to assess the impact of the proposal through a heritage appraisal. Proposals affecting a Conservation Area that would make a positive contribution to the character and special interest of the area will be supported.

### Policy ENV10 – Design

- 5.2.43 Seeks to ensure that all development is of a high quality and reflective of the surrounding area. Development of a poor quality is not supported.

### Policy ENV11 – Local Flood Risk Management

- 5.2.44 Aims to manage flood risk and, where appropriate, improve the quality of the water environment by requiring development to be compliant with the flood risk and surface water drainage guidance referenced in the Policy.

### Policy CW1 – Health and Wellbeing

- 5.2.45 Supports proposals that demonstrate consideration of all aspects of health and wellbeing issues. Major developments are encouraged to submit a health impact assessment.

## **5.3 Material Considerations**

### **National Planning Policy Framework (NPPF) (2019)**

- 5.3.1 The National Planning Policy Framework sets out the Government’s planning policies for England in which the policies set out are material considerations to be taken into account in dealing with applications.
- 5.3.2 Paragraph 7 of the NPPF states that, ‘The purpose of the planning system is to contribute to the achievement of sustainable development.’
- 5.3.3 Paragraph 8 states that ‘there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles: -

- an economic objective – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social objective – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- an environmental objective – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimize waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.’

5.3.4 Paragraph 10 states that ‘to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system’.

5.3.5 A presumption in favour of sustainable development is at the heart of the NPPF and ‘should be seen as a golden thread running through both plan-making and decision-taking’ (paragraph 11). For decision taking this means:-

- approving development proposals that accord with the development plan without delay; and
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed.

5.3.6 Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

5.3.7 Within the overarching roles that the Planning System ought to play, twelve core land-use planning principles are set out which should underpin both plan-making and decision taking (Paragraph 17). These can be summarised as follows, planning should:

- be genuinely plan led, empowering local people to shape their surroundings, with succinct local plans setting out a positive vision for the future of the area;
- not simply be about scrutiny, but instead a creative exercise in finding ways to enhance and improve places;
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
- always seek to secure high quality design and a good standard of amenity;
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas and protecting the Green Belts around them;
- support the transition to a low carbon future;
- contribute to conserving and enhancing the natural environment;
- encourage the effective use of land by reusing land that has previously been developed (brownfield land), provided that it is not of high environmental value;
- promote mixed use developments and encourage multiple benefits from the use of land in urban and rural areas;
- conserve heritage assets in a manner appropriate to their significance;
- actively manage patterns of growth to make the fullest use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable; and

- support local strategies to improve health, social and cultural wellbeing and deliver sufficient community and cultural facilities to meet local needs.
- 5.3.8 The NPPF includes various sub headings (paragraphs 18-149) which contribute to the definition of sustainable development, those of relevance to this development are summarised below.
- 5.3.9 Building a strong, competitive economy (paragraph 80-82) – The planning system should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system. Policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.
- 5.3.10 Supporting a prosperous rural economy (paragraph 83) – Policies should support economic growth in rural areas in order to create jobs and prosperity. This will be achieved by taking a positive approach to sustainable development, supporting the sustainable growth and expansion of all types of business and enterprise in rural areas and supporting sustainable rural tourism and leisure developments.
- 5.3.11 Paragraph 204 identifies that planning policies should, so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously.

#### **National Planning Practice Guidance**

- 5.3.12 The National Planning Practice Guidance (PPG) is a web-based resource which brings together planning guidance on various topics into one place. PPG was launched in March 2014 and is updated periodically to ensure that guidance remains relevant and accords with latest legislation.
- 5.3.13 PPG Chapters of particular relevance to this development proposal include:
- Planning Practice Guidance - Noise (last updated 22<sup>nd</sup> July 2019);
  - Planning Practice Guidance- Travel Plans, Transport Assessments and Statements (last updated 6<sup>th</sup> March 2014);
  - Planning Practice Guidance- Minerals (last updated 17<sup>th</sup> October 2014);

- Planning Practice Guidance- Natural Environment (last updated 21<sup>st</sup> July 2019);
- Planning Practice Guidance- Flood risk and Coastal change (Published 6<sup>th</sup> March 2014);
- Planning Practice Guidance- Planning Obligations (Updated 1<sup>st</sup> September 2019);
- Planning Practice Guidance- Use of Planning Conditions (Updated 23<sup>rd</sup> July 2019);
- Planning Practice Guidance- Water Supply, Wastewater and Water Quality (Updated 22<sup>nd</sup> July 2019)

#### **National Planning Policy for Waste – 2014**

5.3.14 The Waste Management Plan (WMP) for England was published in 2013 and provided an analysis of the waste management situation in England. It also evaluated how it would support the implementation of the objectives and provisions of the revised Waste Framework Directive (2008/98/EC). The National Planning Policy for Waste (NPPW) was published in October 2014 and should be read in conjunction with the NPPF and WMP.

5.3.15 Paragraph 1 of the NPPW refers to the ‘The Waste Management Plan for England’ 2013 which sets out the Government’s ambition to work towards a more sustainable and efficient approach to resource use and management. Positive planning plays a pivotal role in delivering this country’s waste ambitions through (inter alia) delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits by driving waste management up the Waste Hierarchy.

5.3.16 The Waste Hierarchy is set out in Appendix A of the NPPW as below.



- 5.3.17 The 'Waste Hierarchy' ranks waste management options according to what is best for the environment. It gives top priority to preventing waste in the first place. However, when waste is created, it gives priority to preparing it for re-use, then recycling, then recovery, and last of all disposal (e.g. landfill).
- 5.3.18 Paragraph 4 of the NPPW states that Waste Planning Authorities should identify areas for new or enhanced waste management facilities in appropriate locations including giving priority to the re-use of previously developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.
- 5.3.19 Paragraph 7 of the NPPW sets out criteria that Waste Planning Authorities should consider when determining planning applications including considering the likely impact on the local environment and on amenity ensuring that waste management facilities in themselves are well designed, so that they contribute positively to the character and quality of the area in which they are located.

#### **Resources and Waste Strategy for England: 'Our Waste: Our Resources' - 2018**

5.3.20 The Resources and Waste Strategy for England was published in December 2018. It builds upon the objectives of the Waste Hierarchy and sets out how the Government will continue to move toward a circular economy through reducing waste and promoting resource efficiency. The two overarching objectives of the Resources and Waste Strategy are to:

1. Maximise the value of resource use; and
2. Minimise waste and its impact on the environment.

- 5.3.21 The Strategy includes a range of bottom-up policies aimed at educating consumers in more sustainable methods of consumption and the importance of reuse and repair. The Strategy also includes policies aimed at improving the function of local government services.
- 5.3.22 The Strategy acknowledges that whilst the prevention of waste is key, some amount of waste is inevitable. Where waste does occur, it must be managed in the most resource efficient way possible, in keeping with the Waste Hierarchy.

#### **Northamptonshire Local Aggregate Assessment 2018 (Reporting 2017 data)**

- 5.3.23 A Minerals and Waste Monitoring Report (MWMR) is prepared annually by NCC and covers the period 1 January to 31 December of the reporting year. The MWMR includes the Local Aggregate Assessment (LAA). The most up-to-date MWMR was published in 2018, using data up to 2017. The following information taken from the MWMR is relevant to this proposal.
- 5.3.24 Table 4 of the MWMR provides a comparison of the permitted waste management capacity within Northamptonshire between 2016 to 2017 (Mt), and forecasts the indicative capacity for 2021 and 2031. For inert recycling and soil treatment, there was an overall decrease in capacity of 0.07 Mt between 2016 and 2017. Looking ahead, the MWMR forecasts an indicative capacity gap of -0.18 Mt in 2021 which rises to -0.23 Mt in 2031.

## **5.4 Emerging Policy**

### **Emerging West Northamptonshire Strategic Plan**

- 5.4.1 West Northamptonshire local planning authorities comprising Daventry District, Northampton Borough and South Northamptonshire Council are preparing a new Strategic Plan for the area, with support from NCC. The West Northamptonshire Strategic Plan (WNSP) will a spatial vision and strategy for housing, economic growth, strategic infrastructure and health related development up to 2050.
- 5.4.2 The WNSP will not provide policy guidance on mineral or waste related development. A Regulation 18 consultation on the Issues and Options for the emerging WNSP closed in October 2019. Progress has since been delayed however a draft WNSP document is anticipated to be published in 2021.

### **Emerging Pitsford Neighbourhood Plan**

5.4.3 Pitsford Parish Council are preparing a Neighbourhood Plan with the intention of increasing the 'cohesion and sustainability of Pitsford as a community for all its residents and businesses'. The Neighbourhood Plan will cover the period up to 2029, in line with the West Northamptonshire Joint Core Strategy plan period.

5.4.4 The Draft Neighbourhood Plan was published in January 2021 for a period of consultation under Regulation 14 of The Neighbourhood Planning (General) Regulations 2012.

#### Policy PNDP4 – Protecting Landscape Character

5.4.5 Policy PNDP4 seeks to conserve and enhance the landscape character and setting of Pitsford, which lies within Northamptonshire Uplands National Character Area (NCA 95).

#### Policy PNDP5 – Protecting Local Green Space

5.4.6 Policy PNDP5 designates 8 local green spaces within the Plan area, of which 'Bennie Quarry Area' is designated as local green space PNDP5/7. Development of these Local Green Spaces must be consistent with Green belt policy as set out in the National Planning Policy Framework.

5.4.7 The Applicant is supportive of the allocation of land to the north of operations at T's Wood as Local Green Space. However, the Applicant is currently in liaison with the Parish Council over the area PNDP5/7 which currently includes the quarry access road leading to existing stocking areas, weighbridge and site office areas. There is no public access into these areas as they are all associated with the active mineral operation and it is therefore considered inappropriate to allocate land in active mineral operation and associated infrastructure in a green space policy.

### **5.5 Key Policy Considerations and Conclusions**

5.5.1 The proposed development seeks relocation of the Applicants' existing recycling facility at Boughton Quarry to the site of Pitsford Quarry to enable continuation of recycling operations.

5.5.2 Existing sites and sites with either permission for or allocated for waste-related development or minerals processing use should be safeguarded from non-waste and

non-minerals related development use unless alternative provision in the vicinity can be made, or if it can be clearly demonstrated that there is no longer a need for a waste management, or minerals processing facility, at that location.

- 5.5.3 The site is identified as a 'committed mineral development' site within Northamptonshire's Mineral and Waste Plan Policies Map. The site is therefore safeguarded for minerals and waste related development (MWLP Policy 29) and conflicting land-use is to be prevented (MWLP Policy 30).
- 5.5.4 Closure of the existing recycling facility at Boughton Quarry without replacement capacity will lead to a reduction in the capacity for waste management operations within the county. Relocation of the existing facility to Pitsford Quarry will enable the continuation of waste management operations for non-hazardous and inert waste streams in the same locality to serve existing markets.
- 5.5.5 The proposed development facilitates the co-location of waste recovery and mineral extraction within the existing mineral site and reduces the requirement for cross boundary movement of waste to other treatment sites outside of the district.
- 5.5.6 Taking into account the above policy considerations within this chapter, it is considered that the principle of the proposed Recycling Facility within an operational minerals site at Pitsford Quarry is acceptable and accords with both national and local planning policy.

## 6 Need and Benefits

### 6.1 Introduction

6.1.1 In reviewing the planning policies relevant to the proposed development, the following considerations are of particular relevance and are discussed below.

6.1.2 Issues of relevance:

- The Waste Hierarchy;
- The need for inert and non-inert waste recycling; and
- Peter Bennie Ltd and economic considerations.

### 6.2 The Waste Hierarchy

6.2.1 Figure 1 of the MWLP illustrates the Waste Hierarchy, as set out within the National Planning Policy for Waste (2014). As previously discussed in section 4, the waste hierarchy places a preference on waste recycling over other waste recovery and disposal. Inert waste is often imported to mineral sites and used for infill and restoration purposes. Although an important and complimentary use for inert materials, recycling of the waste is considered to be a more sustainable option, in accordance with the waste hierarchy. This application seeks to support the continued recycling of inert and non-inert waste through relocation of an existing recycling facility.

### 6.3 The Need for Inert and Non-Inert Waste Recycling

6.3.1 The adopted Minerals and Waste Local Plan for Northamptonshire seeks to ensure that the County reaches net self-sufficiency in its waste management and disposal capacity. The spatial strategy for the County, as set out in Plan 5 of the MWLP, is to focus waste management facilities within the 'Central Spine' which includes the geographic region surrounding Northampton town. Pitsford Quarry is situated within this geographic region.

6.3.2 The MWLP used local waste forecasts as a guide for future waste management and disposal capacity requirements and to identify the capacity gap between current and

future requirements. An indicative capacity gap of 0.27 Mtpa for inert recycling was identified by the end of the Plan period (2031).

- 6.3.3 Policy 10 sets out the County's waste management capacity requirement over the Plan period up to 2031, taking into consideration any indicative capacity gaps. There is an indicative capacity requirement for 0.26 Mtpa of non-inert waste recycling in 2021, rising to 0.28 Mtpa by 2031. Similarly, an indicative capacity requirement for 0.74 Mt of inert recycling for each year of the Plan period.
- 6.3.4 Appendix 4 of the MWLP sets out the 'commitments' (i.e. sites with planning permission or equivalent) for waste-related development. Although not included within policy, these commitments 'make a fundamental contribution in delivering the waste infrastructure' over the Plan period and continuation of waste uses on these sites is accepted to be favourable (MWLP, page 43).
- 6.3.5 Boughton Quarry is identified in Appendix 4a as a facility for inert recycling and also a facility for non-inert recycling and transfer. No sites for the processing of secondary and recycled aggregates (including inert recycling) have been allocated within the MWLP. It is considered that committed (permanent and temporary) sites, along with sites linked to key construction work, will provide the facilities required.
- 6.3.6 Taking into consideration the indicative capacity requirement for inert recycling within the Plan period, and the existing waste management contribution delivered at Boughton Quarry recycling facility through inert recycling and also non-inert recycling and transfer, it is considered that relocation of the facility is required to support waste management within Northamptonshire. Reliance on the committed sites for processing of secondary and recycled aggregates (including inert recycling), provides a rationale for relocation of the committed site at Boughton Quarry to Pitsford Quarry. This will ensure that the existing waste management operations are retained within the County, and no pressure is placed on securing less-sustainable cross boundary movements to manage the existing inert and non-inert waste flows.

## 6.4 Peter Bennie Ltd and Economic Considerations

- 6.4.1 The NPPF paragraph 204 recognises the contribution that substitute or secondary and recycled materials and minerals waste make to the overall supply of materials.

- 6.4.2 At present, there are 3 employees directly employed at Boughton Quarry recycling facility, all of whom live locally. The waste management operations support in-direct employment in sectors including haulage, goods and services. These jobs are reliant on there being continuity of the waste recycling facility.
- 6.4.3 Without the relocation of the recycling facility, the Applicants business interests will be compromised as will its ability to maintain supplies to existing customers. There is significant demand for inert recycling facilities within the County, as set out in the MWLP. Without the relocation of the existing facility, inert and non-inert recycling would need to be sourced from other sites within the County, potentially at a greater distance from the waste flows. This could in turn increase HGV haulage requirements which would likely result in an increase in carbon emissions.

## 7 Environmental Considerations

### 7.1 Introduction

7.1.1 The proposed development is supported by the following technical assessments which consider the potential environmental impacts of development and assess the proposal's compliance with local and national policy:

- Ecological Management Plan (Appendix A)
- Transport Assessment (Appendix B)

7.1.2 Planning History on the site includes permission for revised restoration of the former mineral workings which involved the establishment of a temporary inert waste recycling facility (Ref. 13/00001/WASFUL). The application was granted in December 2013 and the Decision Notice is enclosed at Appendix C.

7.1.3 The Decision Notice (Appendix C) lists the control and mitigation measures that were agreed by NCC as part of the planning permission for a temporary recycling facility (Ref. 13/00001/WASFUL) which were considered to effectively manage potential environmental impacts associated with the operations. The approved control and mitigation measures associated with this previous permission at the site are carried forward with this application and detailed within this chapter of the Planning Statement. Notwithstanding, mineral operations are also subject to strict environmental controls and the proposed development will operate within these parameters.

### 7.2 Ecological Impacts

#### Policy Context

7.2.1 The Development plan and NPPF contain all policies and guidance for the protection and enhancement of ecological receptors in connection with the development proposals. In particular:

- West Northamptonshire Joint Local Plan (Part 1): Policy BN2
- Daventry Settlements and Countryside Local Plan (Part 2): Policy ENV2
- National Planning Policy Framework: Sections 15 and 17

7.2.2 The thrust of these policies aims to protect, maintain, and enhance nature conservation and biodiversity. The policies seek to protect species and habitats and, through restoration, provide replacement and enhanced habitats.

#### Background

7.2.3 Condition 9 of the previous permission at the site, which included a temporary recycling facility (Ref. 13/00001/WASFUL), required submission and approval of an ecological mitigation plan and aftercare plan prior to any development taking place on the site. This was to ensure that appropriate provision was made for the management of natural habitat relating to the approved development in the interests of biodiversity. The planning permission was not implemented and therefore an ecological management plan and aftercare plan were not submitted with this application.

7.2.4 However, NCC issued a new planning permission on 2nd April 2015 (Ref. 14/00057/MINFUL) associated with the Review of Minerals Permission (ROMP) at Boughton, Pitsford and Moulton. Heaton's were instructed by The Bennie Group to produce an Ecological Management Plan (EMP) for Phase 1 at Pitsford to discharge the requirements of condition 34 of planning permission reference 14/00057/MINFUL. The Ecological Management Plan is in place to mitigate the impact of mineral operations on biodiversity assets. The aggregate recycling facility is located within active mineral extraction areas and therefore it is considered the Ecological Management Plan also covers the potential for impact upon biodiversity as a result of the aggregate recycling facility.

7.2.5 The EMP was informed by the following:

- Extended Phase 1 Habitat Assessment (June 2020)
- Amphibian Survey and method statement (July 2020)

7.2.6 The EMP, dated August 2020, was submitted to NCC to discharge the requirements of condition 34 of planning permission reference 14/00057/MINFUL and is enclosed at Appendix A.

7.2.7 The application site (PBL-006-M.D.001) sites within the site boundary of Phase 1 (GPP-PB-PR-13-02 Rev 3) and therefore the findings of the Extended Phase 1 Habitat Assessment and Amphibian Survey and subsequent mitigation measures set out in the

EMP are considered to be of direct relevance to this application. A summary of the Phase 1 Habitat Assessment and EMP prepared for Phase 1 is set out below.

### Consideration of Potential Impacts

#### **Habitats**

- 7.2.8 Generally the site comprises of a mixture of low to intermediate value habitats. The single area where any habitat loss will occur is the bare ground at the centre of the site which currently comprises of compacted stone and sand. This large area of bare ground forms the majority of the land to be lost to mineral development which is bordered by large steep sided sand and stone bunds to most of its sides.
- 7.2.9 The mature species poor hedgerows surrounding the site are of intermediate ecological value although none of the proposed earthworks or mineral extraction operations will impact, affect or encroach on this habitat.
- 7.2.10 The single habitat considered to be of local, regional or national ecological value is the mixed plantation woodland located approximately 150m North of the proposed works area, due to this distance no adverse effects or impacts will be likely on the habitat.
- 7.2.11 The remaining intermediate habitats identified during the survey were, scrub patches and grassland areas. Both of these habitats provide suitable opportunities for nesting birds for feeding, foraging, sheltering, breeding and nesting. These habitats will be retained and protected during the operational phase of the proposed works. None are affected by the aggregate recycling operations.
- 7.2.12 Should any of the scrub patches or regenerating trees and shrubs require removal then the removal operations will be subject to reasonable avoidance measures to ensure no wildlife is disturbed or any impacts are caused.

#### **Ecological Designations**

- 7.2.13 The nearest designated nature conservation site is over 150m away from the proposed area for operations (LWS – T's Wood), the second nearest designated nature conservation site is 600m south west of the study area (LWS – Grotto Spinney) due to this distance there will be no negative impacts on any designated sites.
- 7.2.14 Should any earthworks reduce the water levels within the sites quarry basin then controls should be implemented to avoid causing any decrease of the water depth

within the well located within Grotto Spinney which is designated as a Local Wildlife Site due to the potential presence of bat species.

### **Species**

- 7.2.15 The desk study identified a range of protected species records within the 2km search area including badger, grass snake and great crested newt. It should be noted that absence of records certainly does not equate to absence of species in a study area. The site has been assessed on the suitability of the habitats to support such protected species and the likelihood of those species being present.

#### *Bird Species*

- 7.2.16 The site provides suitable foraging and nesting opportunities for a wide range of woodland, farmland and wetland bird species, at the time of survey the grass sward height offered limited nesting opportunities for a range of farmland and ground nesting bird species.
- 7.2.17 The scrub, tall ruderal, shrubs and regenerating trees provide suitable nesting habitats which are scattered throughout the site.
- 7.2.18 The adjoining broadleaved woodland at the north of the site provides suitable nesting and foraging opportunities for a variety of bird species. The bordering hedgerows and scrub do provide a suitable nesting and foraging habitat for a variety of ground nesting and farmland bird species.
- 7.2.19 A population of sand martins is currently residing within a vertical stone face which forms the western boundary of the current operational quarry. The stone face is used for nesting purposes which is evidenced through sightings of individual birds and groups of birds accessing and emerging from cavities in the rock face.

#### *Badger*

- 7.2.20 No active signs of the presence of badgers or active and disused setts were noted throughout the area included within this study.

#### *Bat Species*

- 7.2.21 The survey area offered limited foraging opportunities for bats, although some of the mature and semi mature trees within the hedgerows around the site's boundaries could provide potential roosting sites and foraging and commuting routes. The mature

broadleaf woodland situated to the north of the site also provides suitable roosting features and commuting routes. The sites three ponds offer suitable foraging and feeding opportunities for a variety of bat species.

#### *Amphibians*

- 7.2.22 The 3 ponds within the wider site of Phase 1 provide suitable aquatic habitats for breeding, sheltering and foraging by all amphibian species.

#### *Reptile Species*

- 7.2.23 No signs of reptiles were noted during the survey. The majority of the survey area lacked suitable foraging habitat for reptiles as the grassland is regularly managed by mowing.
- 7.2.24 A large vegetated bund is present at the sites eastern boundary which offers suitable sheltering and resting opportunities for all reptile species and also provides a suitable movement corridor for reptile species.

#### Consideration of Mitigation Measures

#### **Ecological Designations**

- 7.2.25 Due to the distance between the proposed development area and designated nature conservation sites in the local area it is considered highly unlikely that there will be any adverse effects on these sites as a result of the works. Therefore no recommendations in relation to designated sites are made.

#### **Further Surveys and Inspections - Protected Species**

#### *Amphibians*

- 7.2.26 3 ponds are present within the wider site of Phase 1. All 3 ponds are divided from the works area by large steep sided bunds formed by stone and sand. A total of 8 ponds are present within the specified 500m search radius of the study area. The 5 offsite ponds are a mixture of fishing lakes and garden ponds. the offsite ponds have been excluded from the assessment due to the fragmentation of habitats and poor connectivity.
- 7.2.27 During the assessment in June 2020 ponds 2 and 3 were both found to have medium populations of smooth newts. Based on the results of the 2020 presence/absence

surveys and eDNA sampling it is considered that great crested newts are confirmed to be absent from the wider sites 3 ponds.

- 7.2.28 To avoid any impacts on the populations of smooth newts a suitable mitigation strategy supported by a site specific method statement would be required to prevent and avoid any impacts on the sites populations of smooth newts. This is included in Appendix A to the Ecological Management Plan and mitigation has been implemented.

#### *Bats*

- 7.2.29 No habitats suitable for bats foraging or roosting will be lost or impacted by the proposed earthworks therefore no further recommendations are being made for these species.

#### *Nesting Birds*

- 7.2.30 Should the sites marginal vegetation increase to a suitable height that it offers nesting opportunities then nesting bird inspections will be required if vegetation is to be cleared during the bird nesting season.
- 7.2.31 As the earthmoving proposals include the removal of small patches of scrub located at the east of the site, this will be subject to a nesting bird inspection prior to its removal.
- 7.2.32 A suitably qualified ecologist is to inspect the vegetation, hedgerow and any adjacent shrubs to be removed within at least 24hrs in advance of its removal. If nesting birds are discovered during these inspections a 20m buffer zone will be produced which will remain until all nesting activity is complete.
- 7.2.33 As the proposed earthworks include the removal of a soil bund which is covered in scrub and tall vegetation then this will also need to be inspected for nesting birds ahead of any earthmoving operations.

#### *Sand Martins*

- 7.2.34 The stone rock face where the sand martins nests is to remain undisturbed during the nesting season. In addition, due to the height of the nesting sites entrance holes, all stockpiled material will be carefully stockpiled to ensure that no materials are within 10 metres of the nesting site entrance holes.

7.2.35 During the nesting season, all machinery and plant movements are to be kept to a minimum when operating close to the rock face and a 10 metre exclusion zone should be formed to prevent machinery movements within a 10 metre radius of the base of the rock face. These exclusions will also be applicable to the recycling operations. See drawing reference PBL-006-M.D.001 which illustrates.

7.2.36 Should any artificial lighting be required on site then this must be positioned at a location and aspect which will prevent any direct additional light on the nest entrances.

7.2.37 On completion of the earthworks the nests are to be assessed to ensure they remain to provide a suitable nesting habitat for the sites population of sand martins.

#### *Reptiles*

7.2.38 If any of the stone or sand piles are to be removed from the sites large bunds then all earthworks are to be supervised by a qualified ecologist following appropriate hand searches for reptiles. A suitable qualified ecologist is to supervise the reduction works and undertake hand searches throughout the root systems of the vegetation to ensure no reptiles are present. On completion of the searches the remaining root systems are to be stripped from the bund. The bund can be moved on completion of the vegetation clearance and searches.

7.2.39 No machinery movements or excavations are to undertaken on the bund or the surrounding ruderal vegetation.

#### *Badgers*

7.2.40 As no evidence of badger activity was recorded during the survey then no long term mitigation is required for this species. It is recommended that the site is subject to a pre works walkover survey to identify any signs of badger activity prior to the commencement of any earthworks.

#### *Bats*

7.2.41 Due to the openness of the bare ground habitat which is the only habitat to be removed it is considered that any impacts on bats for foraging and commuting will be minimal as the suitable habitats will be retained and will continue to provide suitable habitats for a variety of bat species.

### **Restoration and mitigation for loss of habitat**

- 7.2.42 On completion of the quarrying works any proposals for restoration in the form of a landscaping scheme should include provisions for enhancement of the bare ground and scrub patch areas to improve connectivity of habitats and increase foraging and feeding opportunities for reptiles, amphibians and bat species.

#### Ecological Management Plan

- 7.2.43 The EMP sets out a series of mitigation measures for the site of Phase 1 Pitsford Quarry to ensure that all habitats are adequately protected or mitigated during the approved mineral works. The approved Ecological Management Plan has been implemented and will be maintained throughout the existing and proposed future phases of the mineral development.

#### Conclusions

- 7.2.44 Due to the relationship between the application site situated within the Phase 1 operational area, the mitigation measures and working scheme set out in the EMP are considered to be sufficient to cover all proposed waste recycling operations and are submitted as part of this planning application. The proposed development will operate under the existing EMP for the site which ensures that the permitted and proposed operations at the site are compliant with national and local policy and guidance.

### **7.3 Transport Impacts**

- 7.3.1 The Development Plan contains policies and text concerning the potential for Transportation and Traffic issues in connection with development proposals. In particular:

- Northamptonshire's Minerals and Waste Plan: Policy 19;
- National Planning Policy Framework: Section 9

- 7.3.2 The policies seek to ensure that there is suitable and safe access and restrict development that would cause demonstrable harm to the function and safety of the highway network. Paragraph 109 of the NPPF states that development should only be refused on highways grounds if there is an 'unacceptable impact on highway safety', or the 'residual cumulative impacts on the road network would be severe'.

#### Background

- 7.3.3 This application seeks to relocate existing recycling operations from Bennies Boughton Quarry approximately 2km southwest of the Pitsford Quarry site. The overall impact upon the wider local highway network would therefore be neutral. A Transport Assessment has been prepared by Aecom to support the proposed development which provides an assessment of highway capacity and road safety between the two sites (Boughton Quarry and Pitsford Quarry).
- 7.3.4 HGV movements associated with the previous permission (Ref. 13/00001/WASFUL) for a temporary recycling facility were limited to 300 per week (for both aggregate recycling as well as mineral operations). In order to provide an equivalent replacement for the recycling operations currently taking place at Boughton Quarry recycling facility, the Transport Assessment has assessed impacts on highway capacity, road safety and the environment using a worst-case scenario of 600 HGV movements per week.
- 7.3.5 The Transport Assessment (TA) is enclosed at Appendix B. A summary is provided below.

### Consideration of Potential Impact

#### *Traffic Surveys*

- 7.3.6 Traffic surveys supporting this study were conducted in December 2020 (outside of school holidays). They were conducted during the COVID19 pandemic, albeit outside of a lockdown period. It is understood that operations at both Bennies Boughton Quarry and Pitsford Quarry were operating as usual during the period in which the ATC was conducted.
- 7.3.7 An Automatic Traffic Count (ATC) was conducted on the A508 to the south of the junction access.

Vehicle Movement	Weekday AM Peak Hour (0800 – 0900hrs)	Weekday PM Peak Hour (1700 – 1800hrs)	Weekday 12 hour (0700 – 1900hrs)	Weekday 24 hour (0000 – 2400hrs)
Total Vehicles: Northbound	398	506	4,706	5,673
Total Vehicles: Southbound	539	376	4,837	5,714
Total Vehicles: Two- way	<b>937</b>	<b>882</b>	<b>9,543</b>	<b>11,387</b>

Figure 1: ATC data – A508 (vehicles)

- 7.3.8 Figure 1 sets out the total northbound, southbound and two-way vehicle movements along the A508. To put these figures into context, the *Design Manual for Roads and Bridges* (DMRB) has stated that a two-lane single carriageway road should be built to accommodate flow ranges of up to 13,000 AADT. As such, the A508 falls within this threshold.
- 7.3.9 The average two-way weekday 12-hour (0700 – 1900hrs) HGV (OGV1 and OGV2, excluding buses) volume from the December 2020 ATC was recorded as being 1,764 (constituting of 861 northbound vehicles and 903 southbound vehicles).
- 7.3.10 The 85%ile speed on the A508 at the location of the ATC was recorded as being 53mph for northbound movements and 54mph for southbound movements.

#### *Highway Capacity*

- 7.3.11 HGV movements from the Bennies Boughton Quarry site and the Pitsford Quarry site were obtained over a 49-day period between October and December 2020. An average of 21 two-way movements were observed at the Bennies Boughton site per day, and an average of 35 two-way movements are observed at the Pitsford Site. This equates to approximately 2 two-way movements per hour at the Bennies Boughton site and 3 two-way movements per hour at the Pitsford site (assuming a 12-hour working day).
- 7.3.12 The total two-way HGV trips associated with the Bennies Boughton Quarry Site would change the total vehicle two-way flow on the A508 by less than 1% if these trips were additional trips to the network. However, it is noted that HGV trips from the Bennies Boughton Quarry Site are existing trips on the road network so the impact of these trips from the relocation is likely to be minimal and confined to the A508 between Brampton Lane/Vyse Road/A508 roundabout and Pitsford Quarry Site entrance.

7.3.13 The average observed HGV movements for both sites for the standard network AM and PM peaks are shown in Figure 2.

Time period	Bennies Boughton	Pitsford
Inbound AM 8-9	0	0
Outbound AM 8-9	1	2
Inbound PM 17-18	0	0
Outbound PM 17-18	0	0
<b>AM -Total Two-Way HGV Movements (Inbound+Outbound*2)</b>	<b>2</b>	<b>4</b>
<b>PM -Total Two-Way HGV Movements (Inbound+Outbound*2)</b>	<b>0</b>	<b>0</b>

Figure 2: Observed average HGV movements in the AM and PM peaks

7.3.14 Figure 2 indicates that there is very limited HGV movement during the AM peak hours (8:00 AM – 9:00 AM) and no HGV movement during the PM peak hours (17:00 PM – 18:00 PM).

7.3.15 To assess the impact at the Pitsford Quarry access, three PICADY models have been prepared. These identify (A) the operation of the existing site access at the Pitsford Quarry site, (B) the site access with additional Bennies Boughton Quarry Site movements and (C) a robust sensitivity test with the Pitsford Quarry Site access experiencing 60 inbound and 60 outbound HGV movements an hour.

7.3.16 According to the PICADY model results set out in Table 2.4 of the TA, the site access is operating well below capacity in all tests, which is as could be expected given the low number of HGVs per average hour and the high-standard of the access (with ghost-island right turn). For modelling robustness, all HGVs have been assumed to turn right-in and right-out of the access.

7.3.17 Full PICADY results are provided in Appendix B of the TA.

#### *Road Safety*

- 7.3.18 Road safety collision statistics have been obtained from the DfT (via the Crashmap database) from 01/01/2015 to 30/12/2019. The data obtained relates to those collisions that resulted in a personal injury and which were reported to the police. This data (known as STATS19 statistics) is generally recognised to be the most complete record of road collisions occurring on the local highway network.
- 7.3.19 The data shows that there have been four collisions between the Pitsford access and the A508 / Brampton Lane junction. Two of these were classed as 'slight' by the police, one was classed as 'serious' (and involved a goods vehicle at the A508 / Brampton Lane junction) and one resulted in a fatality (single vehicle-involved incident). No collisions have been recorded at the site access.
- 7.3.20 The TA concludes that the small number of trips relocated on the highway network compared to the existing traffic volumes means that a material change in road safety is unlikely.

#### *The Environment*

- 7.3.21 The Institute for Environmental Assessment (IEA) *Guidelines for the Environmental Assessment of Road Traffic* can be used to judge in broad terms the environmental impact of the development in terms of its traffic impact.
- 7.3.22 As a guideline, the IEA suggest that highway links (i.e. roads) should be separately assessed when:
- Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of HGVs will increase by more than 30%)
  - Rule 2: Include any other specifically sensitive areas where traffic flows have increased by 10% of more.
- 7.3.23 The relocation of existing inert recycling operations from Boughton Quarry Site to the site would not trigger the requirement for any further environmental assessment of road traffic. The Bennies Boughton Quarry Site trips would change the daily A508 two-way trips by less than 1% if they were new trips on the highway network. However, since these are existing trips on the highway network, the overall impact will be neutral, with any impacts confined to the A508 between Brampton Lane/Vyse Road/A508 roundabout and Pitsford Quarry Site entrance.

7.3.24 Under a worst-case scenario where there were 600 HGV movements per week (or 120 per average day) at Pitsford Quarry, the total vehicle flow on the A508 would increase by 1.1% (with a 6.8% change in HGV numbers). As such, the TA concludes that the above thresholds for further environmental assessment would not be reached.

#### Consideration of Mitigation Measures

7.3.25 The TA has not found any unacceptable highways impact on highway capacity, road safety or the environment as a result of the proposed relocation of Boughton recycling facility to the site of Phase 1 Pitsford Quarry. Therefore, no mitigation measures are recommended as part of the TA.

7.3.26 The extant permission for mineral working (Ref. 14/00057/MINFUL) set out various conditions relating to Highways and Access.

7.3.27 **Condition 8** - All vehicular access and egress to and from the site shall be from the existing highway access point on the A508 as shown on Site Plan drawing no. GPP/PB/13/02 revision n0.3. The access will be maintained in a good state of repair.

7.3.28 **Condition 10** – No HGV's shall enter the public highway unless their wheels and chassis are clean to prevent material being deposited on the highway.

7.3.29 **Condition 11** – All HGV's leaving the site shall be sheeted to prevent material spillage por wind blown onto the public highway.

7.3.30 The site will operate under the highways and access conditions set out above.

7.3.31 In addition, the application for the temporary aggregate recycling facility (13/00001/WASFUL) imposed additional conditions. These included a combined restriction on HGV movements (mineral extraction and waste operations) to 300 per week. The TA has addressed this matter. As a worst case scenario it is proposed that a maximum of 600 HGV movements per week will be generated by operations. If the WPA consider it is appropriate to restrict movements, a condition limiting the HGV movements to a maximum of 600 would be appropriate.

7.3.32 **Condition 24** - Other than on the A508 Road, no Heavy Goods Vehicles importing or exporting material to or from the site shall travel through Boughton or Pitsford villages unless they are fulfilling contracts within those settlements.

- 7.3.33 **Condition 25** - No import of waste or export of recycled aggregate from the site shall commence until the applicant has submitted to the Waste Planning Authority and received written approval for, a scheme to monitor HGV routing. The scheme shall include measures to ensure that all drivers of vehicles attending the site are made aware of the approved routing arrangements and the steps that will be exercised in the event of default. The approved scheme shall be implemented for the lifetime of the development.
- 7.3.34 The Applicant will accept conditions as identified above to control HGV movements associated with the aggregate recycling operations.

#### Conclusion

- 7.3.35 The TA has assessed the potential impacts of the development of inert recycling operations at the Pitsford Quarry site, which would be relocated from the Bennies Boughton Quarry site.
- 7.3.36 Due to the low number of HGV's being relocated (approximately 2 two-way movements per hour), the effects upon the local highway network is expected to be minimal. The site benefits from an existing high-standard ghost-island junction, with access directly onto Northamptonshire's Strategic Freight Network. No collisions have been recorded at the site access junction.
- 7.3.37 Junction capacity testing has shown the access would remain operating within capacity even with a worst-case number of HGVs using the access per day. In addition, changes in traffic flow associated with an increase to 600 per week would not lead to a perceptible difference in the road traffic environment.
- 7.3.38 As such, the Transport Assessment concludes that the impact of the development would not be 'severe' which is the main policy test under the National Planning Policy Framework (NPPF, 2019).

## 7.4 Air Quality and Dust Impacts

- 7.4.1 The Development Plan and NPPF contain policy and guidance relating to noise and dust or particle emissions in connection with development proposals. Specifically:
- Northamptonshire's Minerals and Waste Plan: Policy 18;
  - National Planning Policy Framework: Paragraph 170

7.4.2 The policies and guidance seek to conserve enhance the natural and local environment by preventing new and existing development from contributing to, being put at an unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

#### Consideration of Potential Impact and Mitigation

7.4.3 In considering the issues set out in the development plan and other policy documents there is a need to ensure that impacts on local communities and amenity are maintained or reduced to acceptable levels.

7.4.4 The previous permission for revised restoration of the former mineral workings at the site which involved the establishment of a temporary inert waste recycling facility (Ref. 13/00001/WASFUL) was supported by dust management and mitigation measures and an approved Monitoring Scheme. To minimise the potential impacts of dust, the proposed development will be operated in accordance with best practice, to control dust emissions by effective site management. Monitoring will continue in accordance with the approved Monitoring Scheme. The measures for the management and control of dust associated with the proposed development are set out below.

7.4.5 Daily visual inspections of the site will be carried out by the Site Manager, at the start of operations and subsequently as necessary, particularly during dry windy weather, to ensure that all potential or actual dust sources are identified and treated promptly.

7.4.6 As an over-riding requirement, if any operations are identified as causing or likely to cause visible dust emissions across the boundary of the application site, those operations will be modified, reduced or suspended until effective remedial action can be taken or the conditions given rises to the emissions have moderated.

7.4.7 General matters and the management of the site can affect the likelihood of significant dust emissions. These include:

- Use of clean water for dust suppression, to avoid re-circulating fine material;
- High standards of house-keeping to minimise track-out and windblown dust;
- A preventative maintenance programme, including readily available spares, to ensure the efficient operation of dust suppression equipment; and

- Effective staff training in respect of the causes and prevention of dust.

7.4.8 Loading and tipping heights will be minimised.

7.4.9 All departing lorries will be inspected, and will be cleaned as necessary, to ensure that track-out is not carried towards the site entrance. All departing lorries will be required to pass through a wheelwash.

7.4.10 A speed limit of 10mph has been set on the access road and signage to this effect has been erected at the site entrance.

7.4.11 The surface of the access road will be damped down and will be maintained as necessary to ensure effective dust control. In the event of track-out being carried onto the public highway, a road sweeper will be deployed to remedy the matter.

7.4.12 A water bowser, fitted with a spray bar or spinner and water gun, will be kept on site and will be deployed as necessary to treat any dry surfaces of the access road, stockpiles and other areas of loose bare ground. Provision will be made for the rapid filling of the bowser so that it can be used as necessary under all weather conditions.

7.4.13 The mobile crushing and screening plant will be operated in accordance with the associated waste permit and the guidance provided in Process Guidance Note 3/16 (04).

7.4.14 The proposed development will also comply with dust conditions as set out in the previous permission (Ref. 13/00001/WASFUL). These include:

7.4.15 **Condition 20** - No development shall take place until a scheme of measures for continuous dust monitoring and analysis of particulates has been submitted to and approved in writing by the Waste Planning Authority. The scheme shall be implemented as approved for the lifetime of the development.

7.4.16 The proposed development will also comply with **Condition 23** which requires any noise and dust complaints to be assessed by the operator and, if necessary, a programme of implementation of remedial measures to be put in place

### Conclusion

7.4.17 The proposed waste recycling facility will operate under the previously approved dust conditions at set out in Conditions 20 and 23 of the previous permission (Ref.

13/00001/WASFUL) which involves the implementation of various mitigation measures before and during operations.

7.4.18 These measures will ensure that any unavoidable dust during waste recycling operations is controlled and mitigated and the development as a whole does not adversely cause unacceptable levels of air quality pollution. The proposed development is therefore in compliance with Local Planning Policy and guidance and the objectives of the NPPF are met.

## 7.5 Noise Impacts

7.5.1 The Development Plan and NPPF contain policy and guidance relating to noise and dust or particle emissions in connection with development proposals. Specifically:

- Northamptonshire's Minerals and Waste Plan: Policy 18; and
- National Planning Policy Framework: Paragraph 205.

7.5.2 The policies and guidance seek to conserve enhance the natural and local environment by preventing new and existing development from contributing to, being put at an unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

### Consideration of Potential Impact and Mitigation

7.5.3 In considering the issues set out in the development plan and other policy documents there is a need to ensure that impacts on local communities and amenity are maintained or reduced to acceptable levels.

7.5.4 The previous permission for revised restoration of the former mineral workings at the site which involved the establishment of a temporary inert waste recycling facility (Ref. 13/00001/WASFUL) was supported by a Noise Impact Assessment undertaken by Noise Vibration Consultants Ltd. (NVC). The Noise Impact Assessment was used to determine the highest likely generated noise impact from minerals and waste operations at the nearest residential receptors relative to the site. This included an assessment of predicted noise from fixed and mobile plant and highway noise from site traffic.

7.5.5 The nearest residential receptors used for monitoring were (and remain):

- Receptor 1: Bunkers Hall Farm

- Receptor 2: Fox Covert Farm
- Receptor 3: The Oaks
- Receptor 4: Home Farm
- The Village of Pitsford approximately 1km north of the site

7.5.6 Additional residential receptors located at a greater distance were not included in the noise assessment for monitoring purposes (Butchers Lane, Church Holding, Stud Farm, Stud Farm Cottages, Spring Meadow Farm, Moulton Mill, Stewart Close and Holcot Centre) however they were included within condition 16 of the subsequent planning permission (Ref. 13/00001/WASFUL).

7.5.7 The Noise Impact Assessment used the following assumptions when predicting likely noise impact:

- 54 vehicle movements per day
- Assumed Noise Levels for the Mobile Plant as set out in Figure 3

#### Mobile Plant

Plant Type	SWL dB(A)	Assumed % Operating Time
Dump Truck (25T)	106	100
Excavator	104	100
Crusher/Screen	100-109	100
Dozer	108	100
HGVs	104	100

Figure 3: Assumed Mobile Plant Noise Levels

7.5.8 These assumptions remain relevant to the proposed development.

7.5.9 The Noise Assessment determined the most significant factors influencing the level of noise to be:

- The sound power levels (SWL's) of the plant or equipment used on site.
- The periods of operation of the plant on site.
- The distance between the source noise and the receiving position.

- The presence or absence of screening effects due to barriers, or ground absorption.
- Any reflection effects due to the facades of buildings etc.

7.5.10 The noise assessment concluded that the cumulative effect of the recycling, mineral extraction and infilling operations during the daytime periods with HGV and mobile plant movement shows that the site could work within reasonable limits, based on the assumed operating plant and proposed noise mitigation measures.

7.5.11 The assessment of site traffic noise concluded that there would be a minor impact magnitude onto the A508 Harborough Road based on a peak hour traffic flow and therefore no significant change in highway noise conditions was expected as a result of the development.

7.5.12 These conclusions remain relevant to the proposed development.

7.5.13 Additional information titled 'Further Clarification & Information Requested in respect of the Noise Impact Assessment' as submitted by NVC and dated 4<sup>th</sup> June 2013. This additional information included a Noise Mitigation Strategy that would achieve appropriate and reasonable noise criteria at the site in light of the mineral and waste operations. **Condition 15** of the previous permission (Ref. 13/00001/WASFUL) required the noise mitigation measures set out in paragraphs 3.1 to 3.2 of this additional information to be implemented for the lifetime of the development.

7.5.14 A revised Noise Mitigation Strategy has been prepared, based upon the previous strategy, and is set out in Appendix D. The Noise Mitigation Strategy as set out in Appendix D will be implemented as part of this planning application.

7.5.15 The proposed development will also comply with further noise conditions as set out in the previous permission (Ref. 13/00001/WASFUL). These include:

7.5.16 **Condition 16** which requires the site to be worked in accordance with the measures set out in Part 1 (Noise), Section 8 of British Standard 5228: 2009 "Noise and Vibration Control on Construction and Open Sites or subsequent edition thereof. The equivalent sound level (LAeq), measured over any 1 hour time period, attributable to the normal operations on site, as measured free field shall not exceed 55 dBA (1hrLAeq) or exceed background levels by more than 10dB(A) at the noise sensitive properties included below:

Receptor	Background noise level LA90 (dB) [lowest L90]
Fox Covert Farm	44[43]
Fox Covert Hall	44[43]
The Oaks	45[41]
Bunkers Hill Farm	45[42]
Butcher's Lane	45[42]
Church Holding	45[42]
Stud Farm	45[41]
Stud Farm Cottages	45[41]
Spring Meadow Farm	45[42]
Moulton Mill	45[42]
Home Farm (Pitsford)	47[46]
Holcot Centre	55

Figure 4: Noise Sensitive Properties

- 7.5.17 For soil stripping and bund formation the equivalent sound level (LAeq), measured over any 1 hour time period as measured free field shall not exceed 70 dBA (1hrLAeq) at the noise sensitive properties in the above table.
- 7.5.18 **Condition 21** - No vehicles and mobile plant used exclusively on site shall be operated unless they have been fitted with and use white noise reversing alarms. Tipping lorries shall either be fitted with and use white noise reversing alarms, or other non tonal alarms, or be routed and managed to minimise reversing manoeuvres.
- 7.5.19 **Condition 22** - No vehicle, plant, equipment or machinery used exclusively on site shall be operated at the site unless it has been fitted with and uses an effective silencer. All vehicles, plant, equipment and machinery shall be maintained in accordance with the manufacturer's specification.
- 7.5.20 The proposed development will also comply with **Condition 23** which requires any noise and dust complaints to be assessed by the operator and, if necessary, a programme of implementation of remedial measures to be put in place.

#### Conclusion

- 7.5.21 The proposed waste recycling facility will operate under the agreed noise limits at set out in Condition 25 of the ROMP (Ref. 14/00057/MINFUL) and implement various mitigation measures before and during operations.

7.5.22 These measures will ensure that any unavoidable noise during waste recycling operations is controlled and mitigated and the development as a whole does not adversely cause unacceptable levels of noise pollution. The proposed development is therefore in compliance with Local Planning Policy and guidance and the objectives of the NPPF are met.

## 7.6 Flood Risk

### Policy Context

7.6.1 The Development Plan and NPPF contain policy and guidance relating flood risk assessment and management requirements in connection with development proposals. Specifically:

- Northamptonshire’s Minerals and Waste Plan: Policy 18;
- West Northamptonshire Joint Core Strategy Local Plan (Part 1): Policy BN7
- Daventry Settlements and Countryside Local Plan (Part 2): Policy ENV11

7.6.2 The policy and guidance seeks to ensure that development is directed to areas at least risk of flooding, unless meeting the exception test, and that new development does not prejudice or increase the flood risk of existing developments.

### Background

7.6.3 Northamptonshire County Council’s local list of requirements for validation states that a flood risk assessment is required for an application where the site area is greater than 1ha and in Flood Zone 1. The site is greater than 1ha in size and thus is required to be accompanied by a Flood Risk Assessment (FRA).

7.6.4 Abington Consulting Engineers were appointed to produce a Flood Risk Assessment (FRA) in support of the previous permission (Ref. 13/00001/WASFUL) for a revised restoration scheme involving inert waste and a temporary inert waste recycling facility at Pitsford Quarry. At the time of the FRA, the site fell within Flood Zone 1 which is described as land having a less than 1 in 1,000 annual probability of river or sea flooding as defined in Table 1 in the NPPF technical guidance.

7.6.5 An investigation of flood risk from rivers and the sea, surface water and reservoirs on the site has been undertaken using the latest ‘long term flood risk’ mapping system (gov.uk). The flood maps indicate no flood risk from rivers and the sea or reservoirs.

Figure 4 indicates the extent of long term flood risk from surface water where no shading indicates Flood Zone 1 (FZ1).



Figure 5: Long term flood risk from surface water (<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>)

7.6.6 As indicated in Figure 3, there is also very limited risk of surface water flooding. According to the latest flood risk mapping data, the site is considered to lie within FZ1 which corresponds to the baseline data used for the previous FRA. Therefore, the findings of the previous FRA are considered to be relevant for the purposes of this application. The FRA, dated December 2012, is enclosed at Appendix E.

#### Consideration of Potential Impacts

7.6.7 Technical Guidance on Flood Risk and Coastal Change provided to accompany the NPPF classifies the vulnerability of development from highly vulnerable to water-compatible development. Waste Treatment is defined within Table 2 of the Technical Guidance as 'less vulnerable' development.

7.6.8 Table 3 of the Technical Guidance indicates the compatibility of land uses within the Flood Risk Zones. FRZ1 is compatible with all development. Therefore the development site complies with planning policy and passes the Sequential Test.

7.6.9 The following mechanisms were identified in the previous FRA as potential sources of flooding:

- Fluvial flooding from the nearby stream.
- Ground water.
- Surface water run-off from the development.
- Surface water run-off from areas adjacent to the site.
- Flooding from Pitsford Reservoir.

#### **Fluvial flooding from the nearby stream**

7.6.10 The 'long term flood risk' mapping system shows the site is remote from any flood plains and therefore the development will not be at risk from fluvial flooding.

#### **Groundwater**

7.6.11 Pitsford Quarry has been operated for several years with no particular problem encountered in terms of flooding from groundwater owing to the permeable geology and low water table.

#### **Surface water run-off from the development**

7.6.12 All surface water run-off from the quarry is contained within the base of the quarry. Surfaces are either hardcore or the natural geology and therefore any surface water collecting in the base of the quarry percolates into the ground. Pitsford Quarry has been in operation for many years and there has never been any flooding from surface water run-off.

#### **Surface water run-off from areas adjacent to the site**

7.6.13 Pitsford Quarry has been in operation for many years and there have never been any issues with flooding associated with surface water run-off from areas adjacent to the site. Only the land to the north of the site falls towards the quarry. This is agricultural/plantation land and owing to the relatively permeable geology, most of the run-off is absorbed into the ground.

### **Flooding from Pitsford Reservoir**

7.6.14 Pitsford Reservoir is approximately 2km north of the site. However, the level of the reservoir is much lower than the site and therefore does not pose a flood risk.

### **Climate Change**

7.6.15 Environment Agency (EA) has provided technical guidance on the predicted impacts of climate change on the water environment taking into consideration the 'life-times' of development. With regard to climate change allowances, the proposed development falls within the '2020s' allowance category, which covers development between 2015 - 2039.

7.6.16 The site is located within the Anglian River Basin District. Data on peak river flow and peak rainfall intensity is provided for each river basin district. The total potential change for peak river flow allowance is 10%. The total potential change in peak rainfall intensity is 5%.

7.6.17 Due to the nature of development, the minimal flood risk identified and the minimal change identified, the proposed development is not considered to be at risk from the potential impacts of climate change on peak river flow or rainfall intensity.

### Consideration of Potential Mitigation

7.6.18 The proposed development is a 'less vulnerable' development and is not considered to cause any adverse impact on the water environment or be at risk to potential climate change impacts.

7.6.19 Therefore, no mitigation is considered to be required in the immediate or long term, in order for the proposed development to take place.

### Conclusion

7.6.20 Development Plan policy and guidance within the NPPF seeks to direct development to areas at lowest risk of flooding, and ensure that new development does not harm the water environment.

7.6.1 The site falls within Flood Zone 1 and as a result, the site is at low risk of flooding.

7.6.2 The proposed development is small scale on existing disturbed areas of mineral extraction. The site does not have issues with perpetual flooding and existing drainage

ditches manage surface water effectively. As a result it is not considered that the proposed development will increase the risk of flooding elsewhere.

- 7.6.3 The proposed development is importing inert waste in accordance with waste protocol to be established by the Environmental Permit. This will include regimes for management, storage and disposal in the event that material is brought to the site that is not in accordance with the permit. As the material to be brought to the site is inert there will be no requirements for a concrete slab/base for recycling operations to take place. The proposed development will not give rise to increased contaminants which may impact the local water environment.
- 7.6.4 The site is located within FRZ1 and the proposals are not considered to pose any adverse risk to the water environment. The proposed development is therefore in compliance with Local Planning Policy and guidance and the objectives of the NFFP are met.

## 8 Conclusions

- 8.1.1 This Planning Statement has been prepared in accordance with the Town and Country Planning (Environmental Impact Regulations) 2017 to support an application for the relocation of an existing recycling facility from Boughton Quarry to Pitsford Quarry. It sets out baseline and background environmental information as well as the details of the development having regard to the location, scale and nature of the proposals.
- 8.1.2 The site is identified as a 'committed mineral development' site within Northamptonshire's Mineral and Waste Plan Policies Map and is therefore safeguarded for minerals and waste related development (MWLP Policy 29) and conflicting land-use is to be prevented (MWLP Policy 30).
- 8.1.3 The Development Plan for Northamptonshire sets out, through strategic and detailed policy guidance, the preferred approach for managing waste within the County. The policies seek to locate new waste development within existing mineral and waste sites as identified within Policy 29 of the Minerals and Waste Local Plan. The key aim of sustainable waste management principles is to minimise the amount of waste that ends up in landfill, in accordance with the Waste Hierarchy.
- 8.1.4 The NPPF states in paragraph 8 that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives; economic, social and environmental. The environmental objective is to *'contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve diversity, using natural resources prudently, minimising waste and pollution...'*. The proposed Recycling Facility within the site of Pitsford Quarry satisfies these objectives through making effective use of land, using natural resources prudently and minimising waste and pollution.
- 8.1.5 Recycling and transfer of inert and non-inert waste represents a sustainable waste management option for this waste stream and therefore accords with the principles of the Waste Hierarchy. The proposed Recycling Facility would therefore be in accordance with both national and local waste planning policy.
- 8.1.6 Based on the conclusions of the supporting Transport Assessment, it is considered that the proposed development could proceed without being subject to any significant

transport impacts, in accordance with the requirements of the National Planning Policy Framework.

- 8.1.7 The planning application is also supported by a Noise Mitigation Strategy, which seeks to ensure that the proposed waste recycling operations would not cause an unacceptable impact on residential receptors.
- 8.1.8 At the heart of the NPPF is the presumption in favour of sustainable development for proposals which are in accordance with the Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission should be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.
- 8.1.9 The Planning Statement and supporting assessments have demonstrated that the proposed Recycling Facility, which would help deliver the waste management requirements of the County, is, on balance, in accordance with the Development Plan for Northamptonshire and there are no material considerations which indicate otherwise.