

---

# Planning Statement Land at Great Billing

---

Progressive extraction of minerals, erection of a processing plant, ancillary concrete plant, workshop, site office and messroom, weighbridge and wheelcleaning facilities with importation of inert reclamation materials including treatment to enable restoration to agricultural and nature conservation

CAPL101297/A6/MH/RE

# Planning Statement

Land at Great Billing

---



## Contents

1.	Introduction	1
2.	Description of Development	2
3.	Planning Policy Context	10
4.	Planning Policy Analysis	15
5.	Conclusions	20

## 1. Introduction

- 1.1. This document is the planning statement submitted on behalf of Anglian Water Services Limited (applicant) for proposed mineral extraction on land owned by Anglian Water at Great Billing.
- 1.2. Anglian Water Services Ltd supplies water and water recycling services to more than 6 million domestic and business customers across its region. This stretches from the Humber north of Grimsby to the Thames estuary and from Buckinghamshire in the west to Lowestoft on the east coast.
- 1.3. The water industry is highly regulated, primarily by Ofwat but also the Drinking Water Inspectorate and the Environment Agency. Sustainability is a key part of the Anglian Water business and they are continually striving to minimise environmental impacts of their operations.
- 1.4. As the landowner of the site Anglian Water is submitting this application in order to supply aggregates to the local market.
- 1.5. This planning statement explains the detailed development proposals and sets out how these comply with the relevant planning policies. A series of drawings are submitted for approval as part of this application and others are for illustrative purposes and will be subject to approval via a planning condition.

### Drawings for approval

F191-033-RevB	- Application Area Plan
F191-300	- Contour Plan
F191-301	- Water Level Sections
F191-302	- Soil Sections
F191-034	- Site Access Works (within Transport Assessment)
0047 PO1	- Progressive Operations Plan – Initial Development & Phases 1 and 2
0047 PO2	- Progressive Operations Plan – Phases 3-4 & 5-6
0047 PO3	- Progressive Operations Plan – Phases 7-8 & 9-10
0047 PO4	- Progressive Operations Plan – Phases Final Works and Completed Restoration
30755-3005-01-Rev F	- Restoration Plan

### Indicative Drawings

Gen/02	- Illustrative detail of typical office and weighbridge
Gen/03	- Illustrative detail of typical office/welfare
Gen/04	- Illustrative detail of typical workshop
Gen/05	- illustrative detail of control cabin
Gen/06	- Illustrative detail of fuelling area
Gen/CP/1	- Illustrative detail of concrete plant
Gen/PP/1	- Illustrative detail of processing plant
0047/O/PW/1	- Detail of Plant & Operation and Water Management Area

## 2. Description of Development

### Overview

- 2.1. The applicant is making an application for full permission to extract 2.5 million tonnes of sand and gravel from the site and its subsequent reclamation and restoration. The proposed development is described as:
- “Extraction of sand and gravel including concrete batching plant, processing plant and ancillary weighbridge, office, workshop, recycling activities and access; importation of inert material and restoration to agriculture and nature conservation.”*
- 2.2. The site is within the Minerals Authority Area of Northamptonshire County Council (NCC) and therefore the planning application is being submitted to the County Council. The application covers both the access route (within the boundary of Northampton Borough) and the extraction area (within the boundary of Wellingborough Borough).
- 2.3. There are three main stages, not including the preliminary works, that comprise the proposed development and which will progress concurrently across the site. These stages are:
- Extraction: the removal of sand and gravel resource, preceded by soil and overburden removal and storage;
  - Reclamation: engineering of the voids to prepare them for filling, followed by filling the voids created by extraction with predominantly imported inert fill material; and
  - Restoration: replacing topsoil for agricultural use and creating new habitats and landscaping, in accordance with the site ‘restoration plan’.
- 2.4. A detailed ‘Description of Development’ (D.K. Symes Associates) has been submitted as part of the planning application. This sets out the general working scheme and a description of the development processes for the development. This section covers the main issues.
- 2.5. The proposed development comprises of:
- Plant and operations area – including material sorting and recycling, a concrete batching plant, processing plant, ancillary weighbridge, site office, workshop and welfare facilities, fuel storage and wheel washing;
  - Water management, including water management ponds;
  - Central soil storage area;
  - Associated access and internal unbound roads.

- 2.6. All site buildings will be of standard metal container design, with one adjacent to a surface mounted weighbridge, and a second for a messroom facility for site and staff. There will be a small office associated with the concrete plant for the batcher-operative. All buildings and plant will be painted dark green unless otherwise agreed. The majority of the buildings will be relatively low with office buildings of 2 or 3 storeys and operational processing plant.
- 2.7. In addition to the above there will either be a small sub-station on site to supply power and there will be a fully silenced generator. The power supply will require a further building which will be of similar size to a 6 metre container and will be located close to the processing plant.
- 2.8. The proposed development will be built out in a number of phases as the process of excavation, reclamation and restoration progresses around the site. Phases commence with the extraction and preparation of the plant and operations area and water management area and then progress in an anticlockwise direction to the east of the Ecton Brook.
- 2.9. The estimated recoverable saleable reserve is approximately 2.5 million tonnes (subject to the market and available resource). The total programme for the process to a restored site is between 18 and 20 years, of which excavation and reclamation will be approximately 13-15 years with completion of final stages of restoration to follow). However, progress will also be influenced by factors beyond the applicant's control, this primarily being market demand. Seasonal weather conditions could also influence the timing of restoration works, such as the replacement of soils.
- 2.10. The initial extraction areas in the western part of the site are required to create the voids necessary for water management. Extraction of these areas is estimated to take 4 years, before extraction moves eastwards and progresses anticlockwise around the site from the south west of the eastern area (see drawings 0047 PO1-4). The final exaction area will be under the Plant and Operations Area in the western area.
- 2.11. The details of plant and operations and water management are set out below. The exact methods and equipment used and number of water balancing ponds will need to be confirmed when an operator is identified for the site and more detail is available on operational specifics.
- 2.12. Working hours are expected to be (or as otherwise agreed):
- Monday to Friday – 0700 to 1800 hours
  - Saturday 0700-1300 hours
  - No working on Sundays and Bank Holidays.
- 2.13. The only activity that may take place outside these hours is the use of a pump for dewatering, although this will be silenced as appropriate.

### **Access and Traffic**

- 2.14. There will be one vehicle access route into the site from Crow Lane to the west, using the main entrance to the Anglian Water Recycling Centre and passing through this site.

- 2.15. Internal roads will include a single one-way crossing of the watercourse Ecton Brook and PROW. To ensure safe use of this crossing point, it will be controlled by traffic lights that will be triggered by the 'in quarry' vehicle and the default position will give priority to users of the PROW. This has been agreed with the County Council's Rights of Way Team.
- 2.16. Two options for the movement of material onsite have been considered: one is by field conveyor, the other is using articulated dump trucks (ADTs). The ADT option is considered to be the best, primarily as it allows for a single crossing of the watercourse and PROW. In addition, the internal roads can be used for both extraction and reclamation materials, by both the ADTs and tipper lorries. Conveyors are not considered suitable for this site due to the need for two-way movement of materials.
- 2.17. The internal roads will be made of hardcore and unbound. To help to ensure a good driving surface and reduced dust they will be maintained to provide a smooth driving surface and kept clear of dust and debris. Dampening will be used to further control dust when required. Vehicle speeds will be controlled at 15mph or less across the site, through site enforcement and speed bumps, with the speed at the crossing reduced to 10mph. The crossing point of the PROW will be hard surfaced and kept clear of any debris by sweeping, either mechanically or by hand.
- 2.18. In addition, there will be temporary roads within phases as they are progressed around the site.
- 2.19. The traffic movements will vary throughout the life of the development with the peak being when there is both extraction and restoration occurring at the same time when there will be a total of 136 movements (68 in and 68 out).

### **Plant and Operations Area**

- 2.20. The Plant and Operations Area, which is located on the western side of the application site adjacent to the site access, will be established first, as shown on illustrative plan 0047/O/PW/1.
- 2.21. This area will consist of two main processes (in addition to other facilities including office and welfare office):
- The sand and gravel screening and washing plant; and
  - Concrete batching.
  - Sand and Gravel Screening and Washing
- 2.22. A typical processing plant plan is attached in Drawing Gen/PP1 which should be viewed as illustrative. In addition, it is proposed that there is an on-site concrete plant, and a typical plant is also attached (plan Gen/CP/1).
- 2.23. Screening is used to separate out the different sizes of sand and gravel – the primary product from the site.
- 2.24. Water is used to wash the extracted material to aid the separation of gravel and aggregate, clean it and that also keeps the process wet to control dust. Water is recirculated for reuse after initial settlement to remove sand and separately silt and clay. Sand is stock piled and silt and clay is sent to the water management ponds.

- 2.25. Processed aggregate is taken by conveyor to separate stockpiles around the processing plant. Material is either loaded directly from stockpile to delivery vehicle, or moved to a further stockpile. This movement of aggregate is carried out by wheeled loading shovels.
- 2.26. The larger gravel (40+mm) is sent for crushing on-site, to produce concreting size material (the principal use for aggregates). Crushing will either be part of the 'in circuit' processes or by a mobile crusher, temporarily imported onto the site for batches of crushing of stored material. The final method selected will depend on the operator's needs. The mobile crusher can also be used to crush larger fill material in the reclamation stage.

### **Concrete Batching**

- 2.27. Concrete batching is co-located on site as the main use for sand and gravel is in the manufacture of concrete. This co-location reduces the need to export bulky materials off-site for batching.
- 2.28. Concrete is created by mixing a defined proportion of differently sized aggregates with cement and water. The aggregates, cement and water are either mixed first in 'pan mixers' before being transferred into mixer truck, or otherwise discharged directly into a truck for mixing. Both methods employ measure to reduce any potential dust creation.
- 2.29. Cement is stored in silos on site. Transfer of the cement powder, both into silos on delivery and from silos to mixers to create cement includes control mechanisms to avoid is escaping and mitigate dust risks.
- 2.30. A typical concrete plant layout is shown in drawing Gen/CP/1. However, the exact layout will be determined by the operational needs of the operator and approval will be subject to a planning condition.

### **Other buildings and structures**

- 2.31. Other buildings and structures in the plant and operations area are likely to include:
- a workshop (portal framed building);
  - office and welfare buildings for workers;
  - area of hardstanding for vehicle refuelling with bunded fuel tanks;
  - a weighbridge;
  - wheel cleaning, likely to include a full wheel/underbody wash unit by the entrance and a wheel spinner in the south east of the plant area to remove material from vehicles returning from the main extraction site; and
  - either a small sub-station or generator to supply energy to the site, housed in a small building.
- 2.32. All buildings, plant and structures will be removed from the site for the final restoration.

### **Water Management Area**

- 2.33. Following establishment of the plant area, the water management area will be worked. This is located to the south and east of the plant area. The water management area is used to manage the water from the extraction sites and silt/clays from the screening and washing process.

- 2.34. Once the mineral has been extracted, the area will be engineered to create settlement ponds, using the basal clay. The ponds will allow silt and clay from the processing plant to settle so that clean water can be circulated back to the plant.
- 2.35. The water will initially be sourced from the gravel groundwater and when necessary will be topped up from the same source. The ponds will be lined and the water from the processing plant will be circulated through the ponds to allow the silt and clay to settle.
- 2.36. Based upon a total excavated mineral volume of c.1.6 Million cubic metres with a silt/clay content of 7%, this would generate some 112,000 cubic metres of silt/clay. The capacity of the water management area is c. 380,000 cubic metres which should be large enough for the whole of the deposit. At completion, the ponds will be just under half filled with wet silt that will be consolidated with reclamation material for restoration.

### **Soil Storage Area**

- 2.37. The soil storage area is located in the centre of the site and will be used to temporarily store topsoil and subsoil layers that are stripped during phase 1-10. The bunds within the soil storage area will be up to 5 metres high.
- 2.38. The topsoil will be stored in 3 metre high bunds around the perimeter of extraction phases. This includes bunding around the perimeter of the western part of the site that will also provide noise screening from the operations and plant area, although this will only be to a height of approximately 3 metres.
- 2.39. The approach to soil handling (both in site preparation and restoration) is to provide a central storage area to allow balancing of materials, especially topsoils. The soils will be handled in accordance with the good practice guidelines for soil handling (see Chapter 14).
- 2.40. This will include separate stripping of top and subsoils, and subsequently separate storage. Storage of soils in bunds, which will be managed to ensure good water shedding and free from weeds, including seeding with low maintenance grass as necessary that will also help reduce dust.

### **Lighting**

- 2.41. Mineral extraction including reclamation is principally a daylight activity so there is no requirement for any fixed lighting on any of the working phases. Lighting will be limited to headlights on the plant. Whilst operating hours include short periods of darkness in the morning and afternoon at certain times of year, it is general practice that work is restricted in these periods, principally for safety reasons.
- 2.42. Within the plant and operations area there are fixed lights mounted on the processing plant. Lights will be cowed and focused only on the plant and stockpiles beneath the conveyors. These lights are needed for limited periods within the operating hours and will therefore not be on between 1800 – 0700.
- 2.43. Lighting will also be required for the refuelling and weighbridge areas, as well as the concrete plant loading area, again restricted to operating hours. They are intruder activated for security purposes. A further light will be mounted at the front of the workshop (facing south) to illuminate the hardstanding in front of the workshop doors.



- 2.44. Illustrative Plan ref 0047-O/PW/1 shows the locations and throw of the lights required for this proposed development. All lights will be focused internally to ensure no light spillage.

### **Excavation**

#### **Soil Stripping**

- 2.45. Prior to mineral extraction, topsoil and subsoil will be stripped using toothless buckets. For this site the average topsoil thickness is 300 mm, with the subsoil being 600 mm. The soils are handled for 6-8 weeks and must be dry. This generally limits soil handling to between August and October. Soil stripping and management will be based on the guidance for soil handling and storage, as set out in Chapter 14 of the Environmental Statement..

#### **Dewatering**

- 2.46. Each working phase also needs to be dewatered to facilitate mineral extraction and reclamation.
- 2.47. The usual approach is to excavate a trench along the edge of the working phase which intercepts the flow of groundwater. The water is then collected in a series of channels which connect to a sump, enabling the settlement of any silt and clay. This is then discharged into temporary surface ponds before re-entering an existing drainage course but exact design could vary depending on the site and local to the phase of extraction and so is likely to vary. This design effectively 'dewaters' the mineral seam, reducing the need to drain the actual working area.
- 2.48. Dewatering does not dry out the mineral seam and therefore dust is not generated by the excavation or handling of the sand and gravel. Pumps used to extract water from drains will be of a modern design that will comply with mitigation of noise impacts for suitable night time operation.

### **Excavation**

- 2.49. The mineral is dug using a hydraulic excavator and loaded onto ADT. ADTs then travel to the internal plant area, through the internal road network as described. Access to and from the site will be through the neighbouring Anglian Water Recycling Centre site to Crow Lane, which joins the A45.

### **Reclamation**

- 2.50. This is the filling in of excavation voids with appropriate inert material to bring the site up to suitable levels.
- 2.51. Before reclamation material can be placed in an excavated void the area must first be engineered. This is done by using bulldozers to shape and compact the existing basal clay. This usually takes 6-8 weeks.
- 2.52. The clay layer lines the exposed face of the mineral and seals it from the further ingress of groundwater.

- 2.53. Reclamation material is delivered by a tipper lorry to a stockpile, where it is spread by a bulldozer in layers of approximately 0.5 metres thick until the desired level is achieved. The thin layers allow the fill material to be inspected so that material that does not comply with quality protocol can be identified and quarantined. For instance, larger material can be removed and crushed and any unacceptable pieces that have been inadvertently included in the load (e.g. plastic and timber) can be removed.
- 2.54. Between each layer the material is compacted. These layers will be built up and controlled by a GPS connected to bulldozers and soil replaced. Import of all reclamation material will be carefully controlled in keeping with any Environmental Permit and include regular Environment Agency inspections, weighbridge checks, visual inspection and only verified operators and prearranged loads accepted.

### Restoration Strategy

- 2.55. This is the replacement of the soil layer above reclamation material, as well as the process of planting and habitat restoration to return the site to an agricultural use that has an enhanced biodiversity and landscape value.
- 2.56. Soil will be replaced on a reclaimed site either from another phase that is being stripped or from the central soil store. Soil handling will follow good practice approaches, see Chapter 14. To prepare the reclaimed material for soil it will be decompacted prior to subsoil being placed.
- 2.57. Ground levels will be returned to their pre-development levels for areas to be restored for agriculture or grassland. However, for 'wetland' areas and other habitats the process will need to vary to create the correct conditions. For instance, in wetlands the restored levels will be lower than existing to create a shallow body of water. These areas may also not be engineered to allow groundwater to flow through the area.
- 2.58. The working scheme has been designed to enable the anticipated restoration scheme to be achieved. This is based on the Restoration Strategy Plan which comprises:
- An east/west aligned complex of wetlands and reedbeds along the southern boundary, achieved through water management, soil form and planting; Approximately half of the application site to be restored to farmland, the southern area of which will be grassland managed for biodiversity with new planting; and
  - New planting including mixed native species hedgerows with trees, strengthening of existing hedgerows.
- 2.59. At the completion of restoration, all plant, buildings and associated structures and equipment will be removed.
- 2.60. The aftercare scheme aims to achieve good soil structure, return the land to productive farmland, enhance wetland biodiversity and established woodland and hedgerows and create new habitats. The aftercare period for active management of the agricultural and ecological restoration will be for ten years with active management to ensure good soil structure is secured and new habitats become established. It is anticipated that a Section 106 agreement will be entered into to secure the long term management of the site.

- 2.61. The aftercare scheme for the agricultural land in the west of the site includes the land being retained in grass for at least the first 2 years, including cutting the grass for hay/silage at least once a year and/or stock grazed at appropriate density. Following this, if considered suitable, the land will be returned to arable cropping. The aftercare scheme for the agricultural land in the east of the site is the same, except that it will not be returned to arable cropping after 2 years.

### 3. Planning Policy Context

#### Introduction

- 3.1. This section sets out the national and local planning policy relevant to the proposed development.

#### National Planning Policy Framework

- 3.2. The National Planning Policy Framework (NPPF) came into force in March 2012. This document sets out the governments overarching planning policy including mineral extraction.
- 3.3. A key element of the NPPF is the presumption in favour of sustainable development. Paragraph 12 specifically states that

*“This National Planning Policy Framework does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up to date local plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise. It is highly desirable that local planning authorities should have an up to date plan in place.”*

- 3.4. Section 13 of the NPPF deals specifically with the sustainable use of minerals. Paragraph 142 states that

*“Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is sufficient supply of material to provide the infrastructure buildings energy and goods that the country needs. However since minerals are a finite natural resource and can only be worked where they are found it is important to make the best use of them to secure their long term conservation.”*

- 3.5. Paragraph 144 goes on to set out the issues local authorities should consider when determining applications for minerals development. These include giving great weight to the benefits of the mineral extraction including to the economy. They should also ensure in granting planning permission for mineral development that there are no unacceptable adverse impacts on the natural and historic environment, human health of aviation safety and take into account the cumulate effects of multiple impacts from individual sites and/or from a number of sites in a locality. They should also provide for a restoration and aftercare at the earliest opportunity to be carried out to high environmental standards, through the application of appropriate conditions, where necessary.

#### Northamptonshire Minerals and Waste Local Plan (2014)

- 3.6. This plan was adopted in 2014 and contains a vision for minerals and waste related development in Northamptonshire it recognises that Northamptonshire will have seen sustained growth and development with sensitively worked and restored mineral extraction sites.
- 3.7. Objective 4 within the plan seeks to facilitate mineral extraction within Northamptonshire particularly for sand and gravel extraction to meet the annual provision rates for Northamptonshire. Sand and gravel extraction is specifically highlighted due to the history of the low land bank for this resource in the county.

- 3.8. Policy 1 sets out the provision for supply of aggregates within the county. This states that over the plan period 2011 to 2031 provision will be made for the extraction of 10 million tonnes of sand and gravel from glacial and pre-glacial deposits and the river valleys of the Nene and the Great Ouse.
- 3.9. In the supporting text to this policy it is acknowledged at Paragraph 4.35 that parts of the Nene Valley will support the strategic approach of having locations for minerals development that are closely related to existing and proposed development. This is specifically the case with the Nene locations directly supporting growth at Northampton and Wellingborough.
- 3.10. Policy 2 sets out the spatial strategy for mineral extraction. This is to focus extraction on the counties pre-glacial and glacial deposits together with the reserves from the river valleys of the Nene and the Great Ouse.
- 3.11. Turning to the site allocations paragraph 4.42 specifically states that
- “The currently worked river valleys of the Nene between Northampton and Wellingborough and of the Great Ouse will play a significant role in delivering the provision to be met. The Earls Barton West extension site (MA5) will provide the vast majority of the worked river valley supply. This site will help to ensure continuity of good quality supplies throughout the plan period and thus complement and support the pre-glacial and glacial allocations.”*
- 3.12. Policy 4 allocates the individual sites for the provision of sand and gravel. Earls Barton West extension is identified as site MA5 in the central Nene Valley for approximately 3 million tonnes.
- 3.13. The proposals subject of this planning application include recycled aggregate processing facilities. Policy 8 deals with such matters and states that:
- “Development of temporary aggregate recycling facilities will be permitted at mineral extraction sites with existing processing plants, particularly where this allows for secondary and recycled materials to be processed or blended to achieve a higher quality end use.”*
- 3.14. Policy 22 seeks to address the impact of proposed minerals and waste development and sets out a number of criteria that have to be considered and addressed. These include protecting Northamptonshire’s natural resources and key environmental designations, impacts on flood risk as well as the flow and quantity of surface and ground water. Other matters include ensuring access is sustainable safe and environmentally acceptable and ensuring that local amenity is protected.
- 3.15. Policy 23 seeks to encourage sustainable transport by minimising transport movements and maximising use of sustainable or alternative transport modes. The policy also states that developments should be well placed to serve their intended markets or catchment areas in order to reduce transport distances.
- 3.16. Policy 24 concerns natural assets and resources. The policy seeks to achieve a net gain in natural assets and resources through protecting and enhancing green infrastructure and strategic biodiversity networks in particular the river Nene and other sub-regional corridors.

3.17. Policy 25 seeks to ensure that Northamptonshire's landscape character is reflected through minerals and waste development. Proposals for minerals development will be required to undertake a Landscape Impact Assessment to ensure that this is the case. The historic environment is covered by Policy 26. This requires appropriate desk based and/or field evaluations to identify the level nature and extent of each heritage asset.

3.18. Restoration and after use is a key policy requirement of the local plan. Policy 28 deals with this matter. The policy 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 land form. The after use of the site will be determined in relation to its land use context, the surrounding environmental character and any specific local requirements, but on the basis that it:*

- *Enhances biodiversity, the local environment and amenity and*
- *Benefits the local community and/or economy.”*

3.19. The policy then goes on to set out requirements for restoration where appropriate. These include establishment of Biodiversity Action Plan habitats and strategic biodiversity networks.

3.20. Finally policy 29 deals with implementation of minerals and waste development. This states that such sites will be controlled and managed through planning conditions and planning obligations and the establishment of a local liaison group where appropriate.

3.21. Appendix 1 to the adopted local plan sets out a site profile for the MA5 Earls Barton West extension. This appendix sets out potential development requirements for the site. These include access to the site via eastern or western end of the site via the A45 junctions. It also states that if the access is to be from the west then the implementation of a one way traffic system should be considered.

3.22. It also states that mitigation measures and restoration should be carried out in line with the Habitat Regulations Assessment for this allocation. It also requires a site specific HRA to be carried out at the planning application stage.

3.23. Finally the use of on site water management systems and mobile plant or existing infrastructure and plant could be used in order to reduce risks associated with flooding. Any static plant should be located in areas of lowest flood risk.

### **Northamptonshire Minerals and Waste Update 2017**

3.24. This document is now adopted and replaces the Northamptonshire Minerals and Waste Local Plan 2014.. The purpose of this update is to concentrate on reviewing the sites and allocations in the local plan rather than the strategy for minerals and waste development.

3.25. In terms of the sand and gravel sites paragraph 4.15 states that inter alia:

*“All sites are operational apart from Earls Barton Spinney and Earls Barton West (where extraction commenced to implement the permissions only but remain inactive).”*

3.26. Policy 4 sets out the updated sites for the provision of sand and gravel. The Earls Barton West extension subject of this planning application has been renamed as M4 rather than MA5 and the tonnage has been reduced from 3 million to 2.6 million approximately. Otherwise the policies remain as set out in the adopted 2014 local plan.

3.27. Appendix 1 sets out the boundaries and profiles of the allocated sites for minerals development. This includes M4 Earls Barton West extension the development requirements have been updated and now state the following:

- Transport Assessment required to accompany planning application
- Access to site via eastern or western end (and therefore A45 junction) if access is taken from the west then this could be via a one way system from Lower Ecton Lane or a two way system from the existing access off Crow Lane.

3.28. Otherwise the development requirements remain as per the 2014 adopted local plan.

### **Borough Council of Wellingborough**

#### North Northamptonshire Joint Core Strategy

3.29. This document was adopted in July 2016 and is formally part of the development plan for Wellingborough. It sets out the strategic development direction for North Northamptonshire.

3.30. The main mineral extraction area subject to this planning application falls within the Borough of Wellingborough. This plan does not contain minerals and waste policies as that is the purpose of the Northamptonshire minerals and waste local plan. However, it is recognised in Paragraph 1.10 that the requirements of the minerals and waste local plan have been incorporated by not sterilising mineral resources particularly of allocated sites.

3.31. Policy 20 of the joint core strategy concerns the Nene and Ise valleys. This policy states that proposals should ensure the integrity of European designated sites such as the Upper Nene valley gravel pits SPA. The policy also seeks to strengthen biodiversity and landscape character and also to provide leisure and recreational opportunities in the Nene Valley.

#### The Borough of Wellingborough Emerging Local Plan

3.32. This document has reached publication stage and is currently being consulted on until 3 November 2017. It is considered that only limited weight can be attached to this document. There are no policy designations that affect the planning application area.

### **Northampton Borough Council**

#### West Northamptonshire Joint Core Strategy Local Plan Part 1

- 3.33. This document was adopted in 2014 and sets out the direction of strategic development within the west of the County. This includes Northampton Borough.
- 3.34. Policy BN2 concerns biodiversity and states that development that will maintain and enhance existing designations and assets or deliver a net gain in biodiversity will be supported.
- 3.35. There is also a specific policy (BN4) regarding the Upper Nene Valley gravel pits Special Protection Area. It states that new development will need to demonstrate through the development management process that there will be no significant adverse effects upon the integrity of the Special Protection Area.
- 3.36. Policy BN8 concerns the River Nene strategic river corridor. It states that

*“The natural and cultural environment of the Nene corridor through the plan area, including its tributaries, will be enhanced and protected in recognition of its important contribution to the areas green infrastructure network, towns landscape, townscapes, regeneration, recreation and historic environment.*

*Proposals for new development and habitat enhancement should demonstrate an understanding of the importance of the River Nene for biodiversity within and beyond the plan area.”*

#### Northampton Local Plan Part 2

- 3.37. This plan is at an early stage having had an issues consultation in June 2016. Ultimately this plan will provide detailed planning policies to manage and guide development across the Borough. However due to its early stage it can only be accorded very limited weight.

#### Supplementary Planning Documents

- 3.38. There are two relevant supplementary planning documents for this application. These are the Northamptonshire Biodiversity SPD and the Upper Nene Valley Special Protection Area SPD. These documents have been taken into account in the preparation of this planning application.



## 4. Planning Policy Analysis

- 4.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that determinations on planning applications must be made in accordance with the development plan unless material considerations indicate otherwise.
- 4.2. Consequently the first consideration is whether the proposals accord with the Statutory Development Plan and then to have regard to all the other material considerations. In this case the Statutory Development Plan comprises of the following documents:
- Northamptonshire Minerals and Waste Local Plan Update
  - North Northamptonshire Joint Core Strategy (2016)
  - West Northamptonshire Joint Core Strategy Local Plan Part One (2014)
- 4.3. The policies contained within the Statutory Development Plan are detailed in the previous section. In addition to the Statutory Development Plan the National Planning Policy Framework (NPPF) came into force in March 2012. This document introduces the presumption in favour of sustainable development. This essentially means that if a proposal is sustainable and in accordance with the development plan then planning permission should be granted without delay unless material considerations indicate otherwise.
- 4.4. In this instance the site is allocated in the Adopted Northamptonshire Minerals and Waste Local Plan for sand and gravel extraction. It is one of the largest sites within the Local Plan and therefore provides a substantial source of the sand and gravel supply within Northamptonshire.
- 4.5. As the site is allocated the principle of sand and gravel extraction on this site is acceptable and therefore the scheme only remains to be assessed in planning policy terms in relation to its environmental impact.

### Landscape and Visual

- 4.6. As part of the application requirements a detailed landscape and visual assessment has been carried out as part of the Environmental Impact Assessment process. Agreed visual vantage points of the site were agreed with the landscape officers and the detailed methodology was also agreed through the EIA scoping process.
- 4.7. The LVIA and the Environmental Statement have concluded that there will be no significant adverse impact on the landscape of the application site and its surrounding area. The assessment was carried out for 3 scenarios. The first one being during the enabling works for the site, the second at year 9 which includes extraction and restoration processes being carried out on site and year 35 once restoration is complete and planting has become established. The assessment concludes that adverse changes to some views are likely to arise during the operation of the site where views or arable fields will change to views of the sand and gravel extraction and the associated plant. However there are likely to be positive changes to views upon completion as a result of the restoration scheme. A number of primary mitigation measures have been used in the development proposals including avoiding and retaining principal areas of woodland and hedgerow across the site and for the plant operation area to be situated at the western end of the site close to the built up area.

- 4.8. The restoration scheme will address any adverse affects and will provide landscape and visual benefits due to the enhancement of the landscape structure and creation of new habitats.
- 4.9. The assessment concludes that there are expected to be beneficial affects of major/moderate significance for woodland, trees and hedgerows on the site and of moderate significance for the overall character of the site once restoration is completed. Consequently it is considered that in landscape terms the proposals comply with Policy 21 of the Northamptonshire Minerals and Waste Local Plan. It also complies with Policy 3 in the North Northamptonshire JCS Policy 3 on Landscape character.

### Transport

- 4.10. This application is accompanied by both a Transport Assessment and a section on transport within the Environmental Impact Assessment. An assessment has been carried out based on the traffic generation created by the mineral proposals this has resulted in the following conclusions. The site access onto Crow Lane is proposed to be improved with revised kerb lines for easier vehicle movement through the junction. This will allow better visibility and easier manoeuvring for the lorries entering and leaving the site.
- 4.11. There will also be a pedestrian island installed between Ravens Way and the site access junction to improve safety. The site is located close to Northampton which is a major market for sand and gravel. It also benefits from an access close to the Great Billing interchange on the A45. Mineral traffic will therefore not have to travel through local villages and will be able to access the strategic highway network via Crow Lane.
- 4.12. Using appropriate traffic software future year scenarios have been considered to test the junctions along Crow Lane north of the site access. This assessment shows that the proposed development will operate within the capacity for the relevant junctions. The impact of development traffic on the surrounding road network is minimal and does not affect the surrounding junction operation.
- 4.13. In addition the Lorry Management Plan will be prepared which will include access restrictions during peak hours and other internal issues such as vehicle cleansing facilities within the site prior to entering the highway network. Consequently it is considered that the proposal is compliant with Policy 19 which encourages sustainable transport.
- 4.14. A noise and vibration assessment has been carried out to consider the potential noise levels likely to be generated by the operation of the site and the potential impact on existing noise sensitive receptors. The assessment concludes that the noise levels will be negligible to minor and all the predicted noise levels are within the limits set in accordance with the Planning Practice Guidance.
- 4.15. In terms of cumulative affects with the adjoining consented quarry operations, the cumulative noise from the proposed development will not result in any exceedances of the noise limits. Consequently, we consider that the proposals comply with the requirements of Policy 18 of the Minerals and Waste Local Plan 2017 in respect of noise and vibration.

### Air Quality and Dust

- 4.16. The detailed Air Quality Assessment has addressed both road traffic emissions and dust in relation to the proposed mineral development. These impacts have been assessed on the air quality levels at 8 representative sensitive locations. The assessment concludes that there will be a negligible impact on air quality and consequently mitigation measures for this are not required. In relation to dust there will be no significant affects provided that the dust management plan is followed including water spraying for dust suppression. The possibility of odour has also been addressed in the EIA. This concludes that there was only a localised potential source of odour on the site and that this would not generate any concerns around odour. Therefore the proposal is in accordance with Policy 18.

### Hydrology and Flood Risk

- 4.17. In terms of flood risk the Environmental Statement at Chapter 11 covers this subject together with the accompanying flood risk assessment. As a consequence of the proposed extraction of the sand and gravel within the site there will be a resulting increase in flood plain storage capacity in the southern section of the site. This increase in capacity will have a positive local influence and in environmental assessment terms will have a minor beneficial affect.
- 4.18. During extraction there will be top soil and overburden stored in temporary bunds around the site and the effect on site flood risk is considered negligible. The temporary bunds will not have a measurable impact on the flood levels in the area because of their minimal footprint when compared to the overall flood plain area. The Plant Site area is located within Flood Zone 1 and so is in an area which is very unlikely to flood. The proposals are in accordance with Policy 18 in respect of flooding.

### Archaeology and Cultural Heritage

- 4.19. A geophysical survey has been carried out across the site and this revealed potential archaeology in the north west parcel of the site allocated for sand and gravel extraction. This is discussed in more detail in the archaeology chapter of the ES. Consequently this area has been excluded from the extraction area. Detailed trial trenching has been carried out across the proposed mineral extraction area. This has confirmed that there are no finds of archaeological significance on the site. Ditches and furrows form the majority of the archaeological features that have been found. These point to a sustained period of agricultural activity before and after the use of the site for a sewage farm. No evidence of archaeological remains were found in the lower alluvium deposits and consequently there is a negligible affect on the cultural heritage and archaeology of the site. Therefore the scheme complies with policy 26.

### Ground Conditions

- 4.20. The site has historically been used for disposal of sewage in a series of irrigation fields from the 1880s up to the mid 1960s. This activity has resulted in metals and phosphates at levels in the soil exceeding appropriate levels. In order to ensure that there is no negligible or significant effects as a result of the development a number of mitigation measures are proposed. These are set out in detail in the ES chapter on ground conditions but include measures such as avoiding workings in or near to the water courses and maintaining stand off distances between working areas and site boundaries. The main soil storage areas will also be kept away from water courses.

- 4.21. It is considered that there will be no adverse residual effects from contamination after the relevant mitigation measures have been applied. Surface water quality will be subject to a permanent beneficial affect as the areas of mineral extraction restored to wetlands will capture run off allowing settlement of particles containing metals and phosphates. Ground water will also be subject to a permanent beneficial affect as mineral extraction will remove sand and gravels containing phosphates.

### Agricultural Soils

- 4.22. The EIA Scoping Report issued by Northamptonshire County Council required an agricultural land classification report and for the impact on soils to be assessed within the Environmental Statement. An ALC report has been carried out which identifies the land as grade 3b agricultural land which is not best and most versatile. This is due to the presence of heavy metals as explained in the ground condition section of the ES. Consequently the proposed mineral extraction will result in a loss of agricultural land at grade 3b however this will be restored to reed beds and grassland habitats which will result in a net benefit to biodiversity.
- 4.23. As there is no approved method for assessing significance of effects in relation to agricultural land in the context of EIA it is considered that the loss of approximately 50 hectares of grade 3b agricultural land to new habitat restoration is of minor significance.

### Climate Change

- 4.24. Chapter 15 of the Environmental Statement addresses the impact on climate change by the proposed development. This scheme will result in green house gas emissions through the use of machinery and transport of minerals. However these will be minimised where possible by keeping machinery well maintained and processing minerals within the site to minimise the required transport distance. In addition the proposed development will not exacerbate the indirect affects of climate change (air quality and flood risk).
- 4.25. The ES concludes that there will be no significant residual affects on the climate. Benefits will be provided by the increased flood plain storage and creation of new woodland within the restoration of the site.

### Ecology

- 4.26. Ecology is an important issue in the determination of this planning application. This application is accompanied by a Habitat Regulations Screening Report together with an Ecological Assessment and the ecological chapter in the Environmental Statement. Ecological surveys have been carried out across the site for a number of years and this has allowed a significant amount of information to be available to the project team. It has also allowed the scheme to be designed to avoid adverse ecological impacts. The minerals extraction site is located 1.4 km from the Upper Nene Valley Gravel Pits and so there will be no habitat loss at the site or disturbance to birds within the designated site. Ecological surveys undertaken to date at the site have concluded that the species associated with the Special Protection Area use the site infrequently and are unlikely to be significantly disturbed by the potential effects associated with the scheme; especially given the availability of suitable habitat in the wider area that the species could utilise during works.

- 4.27. The ecologically sensitive areas of the site are predominantly in the margins and extraction is occurring in the arable areas of the site. The north westernmost parcel of the allocated land, whilst within the red line, has been excluded from the extraction area due to archaeological reasons explained above and also due to the sensitive ecology that exists along the water course in that parcel of land. The woodland spinney at the eastern end of the site will also be retained. The majority of the most sensitive habitats will not be directly affected and the majority of areas found to support protected species will not be affected.
- 4.28. Policy 20 of the adopted Minerals and Waste Local Plan update concerns natural assets and resources and seeks to achieve a net gain of these elements. The existing site is predominantly arable and once the scheme is complete there will be an additional 52 hectares of new habitat created from the 110 hectare extraction site. The restoration scheme has also been designed to tie in with the adjoining permitted restoration schemes to the north and east of the application site. Consequently the proposed application scheme meets the requirements of Policy 20 in terms of protecting designated sites and enhancing the River Nene corridor. The scheme will also result in a net biodiversity benefit through the restoration scheme through the addition of approximately 50 hectares of new habitat creation. Therefore the scheme also complies with policy 4 of the North Northamptonshire JCS and policies BN2, BN4 and BN8 of the West Northamptonshire JCS.

## 5. Conclusions

- 5.1. This application submitted on behalf of Anglian Water seeks planning permission for the extraction of 2.5 million tonnes of sand and gravel on land east of Great Billing Water Recycling Centre near Northampton. The site is allocated in the Northamptonshire Minerals and Waste Local Plan Update 2017 and so the principle of development of the site for sand and gravel extraction has been established.
- 5.2. The accompanying Environmental Statement has identified the likely significant impacts and has concluded that appropriate mitigation measures can be secured to ensure that no unacceptable adverse impacts will arise. The Environmental Statement has also considered the cumulative effects of the adjoining mineral planning permissions and concluded that development subject of this application will be acceptable in this regard.
- 5.3. The preparation of this application has been subject of significant consultation with local communities and parish councils and statutory consultees and this has shaped the proposals that have now been submitted. The detail of this is set out in the Statement of Community Engagement
- 5.4. It is important to note that the proposals will be phased such that restoration will follow the extraction around the site. The scheme includes a detailed restoration strategy as set out in Appendix F12 of the Environmental Statement. Habitats to be created at the site include hedgerows, wetlands, reedbeds and grasslands. These proposals have been designed to tie in with the adjoining restoration schemes and will result in a significant improvement of this area of the Nene Valley.
- 5.5. In conclusion it is considered that this application complies with the relevant development plan policies and we respectfully request that the planning permission is granted accordingly.