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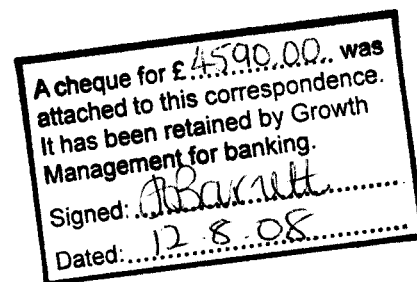
Our ref: JWG/AF – R14/3

Your ref: PP-00516973

7 August 2008

Mr S Smith
Minerals Planning Officer
Northamptonshire County Council
County Hall
Northampton
NN1 1AX

Dear Mr Smith



RUSHTON QUARRY LANDFILL SITE
PROPOSED RECYCLING FACILITY INCLUDING THE STORAGE, TRANSFER
AND TREATMENT OF WASTE, ESTABLISHMENT OF A WASTE RECYCLING
BUILDING AND SKIP STORAGE

1. Planning consent exists at the Rushton site for the importation of non-hazardous waste, and the infilling operations are regulated by the Environment Agency. Consistent with European and National policy framework guidance, and adopted development plan policies, it is proposed to establish a waste recycling facility that will process material brought onto the site to recover the optimal amount of suitable material for reuse.
2. It is envisaged that this activity will take place within two areas (A and B), identified within the two enclosed Drawing Nos. R14/101 and R14/102. Area A extends to approximately 1.3ha and is closest to the site access, and includes the existing offices, weighbridge and wheelwash facilities. A purpose-built structure measuring a maximum of 50m by 50m will be established within the southern extremity of this area and retaining walls within the structure will permit material to be tipped undercover, and then subsequently processed. Imported material will be sorted, primarily within the built structure, and material such as plastics, wood and cardboard with either be baled or shredded. The proposed structure will be clad to within 4m of ground level with olive green panels (BS 12 B 27) on the east, south and west facing aspects, with only the north face (i.e. that facing the landfill site) being open.
3. The northern area (Area B) currently consists of a void left by previous mineral recovery, and therefore is below the surrounding ground levels. The area identified extends to approximately 1.35ha although only a proportion of

this area will ultimately be required for the envisaged recycling operations. Concrete and brick rubble will be stored within this area, and when sufficient material is available, a mobile crushing unit will be brought onto the site to process the material. It is envisaged that such episodic activities will only take place every two to three months, and will continue for no longer than two weeks on any occasion. Stockpiles within this area will be limited to 5m in height. Waste skips will either be stored within Area A or B in locations which are not clearly visible from the public highway.

4. HGVs delivering waste or carrying processed material will use the existing weighbridge, and if required, will use the existing wheel cleaning facility before joining the public highway. Consistent with the provisions of the existing Section 106 Legal Agreement in respect of landfilling, no HGVs will travel through the village of Rushton to access the site (unless specifically collecting waste from within the village area).
5. Given the relative remote location of the two proposed recycling areas, noise can readily be controlled to levels identified as being acceptable within Minerals Policy Statement 2 (*Controlling and Mitigating the Environmental Effects of Mineral Extraction in England*) published by the DCLG in 2005. The operations within Area A would either be undertaken within the confines of the proposed new structure, which is some 12m in height, or the structure itself would provide an acoustic screen to properties located over 250m to the south-west, close to the road intersection. It is envisaged that any shredding of wood, cardboard or plastics would be undertaken generally within the building itself, with mobile plant and HGVs manoeuvring around the area to the north of the building.
6. The closest point of Rushton Village is over 500m to the south-west of the proposed southern limit of the recycling activities, and in any event, an intervening railway embankment will provide an acoustic barrier to any site operations. Whitehouse Farm, an isolated property, is in excess of 800m to the south-west of the recycling activity within Phase A.
7. In respect of Area B, as noted above, the principal activity will involve the stockpiling of concrete and brick rubble below the surrounding ground level. Periodically, a mobile crusher will be brought onto site and process material as recycled aggregate. It is envisaged that this will be undertaken for a maximum period of two weeks up to six times per annum, and again, for avoidance of doubt, these activities will be undertaken below the surrounding ground level. The closest property to these activities, Storefield Lodge, is 500m to the north-east, and in any event, is owned and occupied by the applicant. Keepers Lodge, which is adjacent to the A6003, is located over 800m to the east of the proposed recycling Area B.
8. In respect of air quality, dust will be controlled by the use of either a mobile water bowser or sprinklers (within the building itself) to dampen the ground in line with central government guidance documents to minimise potential adverse impact. Before exiting onto the public highway, if required, HGVs will pass through the wheel cleaning facility to ensure that no mud or detritus will be carried onto the public highway, or indeed, that dust will be generated.

9. It is proposed that the recycling facility would operate between 0700 hours and 1800 hours Monday to Friday and 0700 hours to 1300 hours on Saturday which is consistent with the provisions of the existing landfill consent. It is additionally proposed that HGV's could deliver material until 1700 hours on Saturday although no processing of that material would be permitted after 1300 hours.
10. The proposed recycling facility within the existing Rushton site will not compromise the previously permitted restoration profile of the landfill site. At an appropriate stage, consistent with the requirements of the existing planning consent, the built structure will be removed, and the area reinstated in accordance with the previously approved plans.

Design and Access Statement

11. Consistent with the requirements of Circular 01/2006 and guidance published by the Waste Planning Authority, the following consists of the Design and Access Statement.
12. Details of the application site and surrounding land uses are set out in this covering letter, which confirms that the proposed waste recycling facility is located within an operational waste landfill site area. The application is for waste recycling, including the establishment of an enclosed building, to receive, process and transfer waste within an area which is operated specifically for the handling and disposal of waste. The site is therefore ideally situated for expansion of these compatible operations, and entirely consistent with the surrounding land uses. The site is located close to the primary road network in the form of the A6003, and the proposed vehicle routing will not permit HGVs to pass through any local settlements consistent with the provisions of the existing legal agreement relating to the landfill site.
13. The design and scale of the new building is proposed to be contemporaneous with the adjacent land uses, which include a raised land dome in excess of 20m above surrounding land. The visual impact is considered minimal in the context of such adjacent land uses. The erection of the new building will seek to ensure that waste recycling operations are carried out in an efficient manner, and will be better integrated within existing waste handling flow lines.
14. The existing operations on site already benefit from an established infrastructure, including a purpose-built access, car park, access road, weighbridge and wheel washing facility. The layout of the site enables the safe segregation of HGVs and other vehicle traffic.

Northamptonshire Waste Local Plan

15. The County's Waste Local Plan was formally adopted in March 2006, and establishes the land use strategy for all waste within Northamptonshire, and its stated purpose seeks to provide guidance in respect of the terms of the acceptability or otherwise of the locations and to control development through setting out a range of standards and assessment criteria against which applications for planning permissions are to be judged.

16. Importantly, the Waste Local Plan is consistent with governmental advice in that it seeks to encourage increased waste treatment capacity within the County, and reduce reliance upon landfill. Chapter 2 of the Minerals Waste Local Plan details the policy content of the document, considering European and National policy framework guidance, including the European Union landfill directive. The introduction of a waste recycling facility at Rushton is consistent with these stated objectives.
17. These documents, along with planning policy guidance and planning policy statements, establish the principles of the hierarchical approach for waste management, including a significant reduction in the volume of material direct to landfill. Importantly, at paragraph 2.4, reference is made to the waste hierarchy which has "*Waste prevention at its highest level and moved down through reuse, recycling and recovery of waste disposal which is routed at the bottom of the hierarchy.*" The paragraph goes on to confirm that implementing such an approach decreases the environmental impact of waste, and maximises the beneficial uses of the resources it represents. Paragraph 2.19 states that despite the increasing emphasis on the moving of the waste hierarchy, the demand for waste management sites in Northamptonshire will not reduce; there is actually expected to be a growth in waste generated. Paragraph 2.20 goes on to confirm that the demand for different types of waste management facilities will also change over time, and it will therefore be important to retain the flexibility to promote new technologies and proposals through the policies of the Waste Local Plan.
18. Chapter 4 of the Waste Local Plan details the land use strategy for waste within the County, and at paragraph 4.1, confirms the fundamental principle on which the Local Plan is based is the promotion of sustainable development. The paragraph goes on to confirm that the strategic approach of the plan incorporates the principles for waste treatment, together with locational strategy, and together these apply to National and Regional policies and guidance for waste within the County.
19. Positive policy support exists for the establishment of a recycling facility within the existing Rushton landfill site, and in particular Policy 2 confirms that the development of waste management facilities within the County will be permitted in sites including "*existing main sites*", which Rushton is considered to be.
20. With its relative remote location generally away from residential dwellings, the recycling operations within the Rushton landfill site area can satisfy all development plan policies relating to amenity protection, and by continuing to use approved lorry routing arrangements potential traffic and highway impacts can be minimised.

Summary

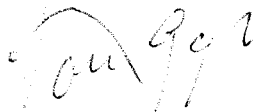
21. A planning application is being submitted to establish two areas for recycling materials, including the establishment of a built structure located within the existing Rushton landfill site. The proposed activities are relatively remote from residential dwellings, and amenity controls consistent with Minerals Policy Statement 2 will ensure there is no material harm to local amenity. The Design and Access Statement confirms that the proposals are contemporaneous with the adjacent land uses, and benefits from existing

access onto the public highway, with relatively short access onto the A6003 road network.

22. On behalf of Cook Lubbock & Co, it is hoped that the details of the development are sufficiently clear for the application to be determined expeditiously, and we trust that, should there be any queries whatsoever, you will not hesitate to contact the undersigned. A cheque to the value of £4,590 is enclosed, along with the appropriate application forms and certificates.

It is confirmed that a copy of this correspondence, and the attached plans, will be emailed to your office to assist with the consultation exercise.

Yours sincerely



J W Gough
David L Walker Chartered Surveyors
Agent for Cook Lubbock & Co

Encs Application form and certificate
 Drg No. R14/101 (Location Plan)
 Drg No. R14/102 (Site Plan)
 Drg No. R14/103 (3 dimensional image of building)
 Cheque £4,590