

W001-12 MD

13 November 2016

Peter Moor
Northamptonshire County Council
Floor 3
Guildhall Road Block
County Hall
Northampton
NN1 1DN

Dear Mr Moor,

**PLANNING APPLICATION 16/00022/WAS/FUL
PROPOSED WOOD YARD, PEBBLE HALL FARM – REVISED SITE LAYOUT AND SUPPORTING
DOCUMENTATION**

Further to recent conversations, please find enclosed a revised site layout for the the proposed wood yard that supersedes that submitted with the planning application submitted in May 2016.

The original application was accompanied by an Environmental Statement (ES) that summarised the environmental impact assessment (EIA) carried out. As a result, it has been necessary to revisit both the EIA and the ES and update those accordingly.

The following documentation accompanies this letter:

- Drawing GPP/WWM/PHWY/16/04 Revision 12 – Proposed Site Layout Plan
- Drawing GPP/WWM/PHWY/16/06 Revision 2 – Proposed Storage Bays
- Environmental Statement Addendum and Appendices, November 2016
- Non-technical Summary, November 2016
- Superimposed Site Layout Plan Weldon
- Superimposed Site Layout Plan Wormslade

Full detail of the revisions to the site layout and the impact of the changes are set out in the documentation.



Scale

At recent meetings, Officers have raised concerns regarding the perceived scale of the development footprint. We have given this a great deal of consideration alongside the need to provide a continuous supply of wood to the REGF and believe the revised site layout delivers a reduced physical development footprint which is compliant with policy.

Then original development footprint was 3.2 hectares. The physical development footprint has been reduced to 2.45 hectares, which represents a reduction of 23%. This has additional benefits of enabling some of the residual land to be retained in agricultural use and additional planting and screening.

Welland Waste Management have secured the contract to supply wood waste as a fuel for the adjacent Renewable Energy Generation Facility (REGF). The REGF, when fully operational next year, will require a continuous supply of fuel. The sister plant in Tyseley is reliably producing power and operating continuously without issue indicating that this plant at Pebble Hall Farm will require a fuel supply sooner rather than later.

As referred to in the submitted documentation, Welland Waste Management have an existing wood yard that would have supplied the wood for the REGF. However, a change in Environment Agency Guidance on Fire Prevention Plans means that the ability to supply wood from that yard has reduced from 5,000 tonnes (permitted amount) to 400 tonnes of unprocessed wood.

As a result of the revised guidance, Welland Waste Management has been forced, at significant cost, to derive an alternative solution. The solution, which is shown to comply with the Development Plan, is a new wood storage yard with capacity to store around 21 days of wood supply to the REGF. This is sufficient to cover the winter/Christmas period (14 days) with a further 7 days' flexibility should there be other periods of inclement weather or a downturn in the availability of waste.

The physical development comprises, in the main, a concrete pad with storage bays. As a result of the latest Fire Prevention Plan Guidance it has been possible to reduce the height of the bays to 5m (previously 6m) and the number of bays has been reduced from 53 to 42. The revised layout has been assessed in landscape and visual impact terms. The reduction in land take is considered to be positive in principle and the mitigation proposed remains effective.

In terms of scale, there are relevant policies in the Development Plan.

Policy R2 in the West Northamptonshire Joint Core Strategy, December 2014 addresses rural economy and the economic and environmental aspects of sustaining the economy. Proposals which sustain and enhance the rural economy (such as the proposed wood yard that will feed the REGF) are supported where they are, *inter alia*, of an appropriate scale for their location. The proposed wood yard is considered to fall into an acceptable development, as defined in the Policy. Scale of development is a matter of perception and there is no supporting text that defines what scale of development would be acceptable in what circumstances.

It is also relevant to record that Daventry District Council has raised no objection to the development and that is taken to mean that the Council sees no conflict with extant local planning policies. In this case, in terms of scale, the relevant policy would be Policy EM16 (see below).

With this context in mind, a review of planning decisions made by NCC has been conducted to determine how the issue of 'scale' has been assessed in the planning balance. In particular, we draw attention to two developments at Wormslade (15/00090/WASFUL – Anaerobic digestion facility and other plant and infrastructure, determined at Committee on 28th June 2016) and Weldon (Composting – determined at Committee on 26th April 2016).

We attach two drawings that show the 'scale' of the proposed wood yard in the context of those proposed developments which demonstrates that this proposal is not unacceptably large or out of keeping with its surroundings.

With reference to the Committee Reports, we note, in the case of Wormslade, that Daventry District Council objects to the proposals on open countryside and other matters. Paragraph 8.16 of the Report to Committee states:

*"Policy R2 'Rural Economy' supports proposals which sustain and enhance the rural economy. It specifically states that proposals will be supported where they are an appropriate scale for their location, respect the environmental quality and character of the local area and protect the best and most versatile land. It lists the types of development which will be acceptable which include the re-use of rural buildings and schemes for farm diversification involving small scale business and commercial development that contribute to the operation and viability of the farm holding. **This scheme is not small scale.** Nevertheless, the development is compatible with a rural area given its links to agriculture and farm based anaerobic digestion and is also recognised by Government as contributing to renewable energy targets. This site also has the advantage of the presence of a nearby high pressure gas main. Together these can be considered to make the site location suited to the proposal. **The fact that the development is not small scale has to be balanced against the other material considerations which support the application including the development plan and national policy support for renewable energy in the NPPF and Policy S11 of the WNJCS.**"*

The proposed wood yard is of a lesser scale than the development as Wormslade. In the context of the Officer's assessment (above), even if the revised layout was considered not small in scale the same planning balance would need to be applied, this includes the wider compliance with the wider compliance with the Development Plan and the contribution the proposal would make to renewable energy by providing a continuous supply of feedstock to the permitted REGF.

Saved Policy EM 16 'Hamlets and Open Countryside' in Daventry District Local Plan (June 1997) states that business and general industrial developments in the open countryside will not normally be granted unless these are small scale. In the case of Wormslade, the proposed development was not in line with this policy. However, Officers concluded that WNJCS Policy R2 covers a similar remit and this is an up to date policy which carries more weight in the final decision.

In the event that 'scale' is still a perceived planning issue the same emphasis on Policy R2 should be applied.

The site at Weldon is also significantly greater in size than the Pebble Hall wood yard. It has a different local policy context, however, there is no consideration in the Committee Report of the extent to which the scale of that development is appropriate in that locality.

Conclusion


It is clear, from our assessment, that the proposed wood yard is compliant with the Development Plan. As confirmed in National Planning Policy Framework (Paragraph 196), the planning system is plan-led and planning law requires that applications for planning permission **must** be determined in accordance with the development plan unless material considerations indicate otherwise (Section 38 (1) of the Planning and Compulsory Act 2004).

The EIA, and updated EIA relating to the revised site layout, demonstrates that the proposal will not give rise to adverse environmental or cumulative effects.

There are no other material considerations that would warrant a refusal of planning permission.

Please do not hesitate to contact us if you require clarification on any matter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Maureen Darrie', is written over a light blue rectangular background.

Maureen Darrie
Director