



JULY 2020

Planning Statement

Temporary Compound Area at Land East of Shelton Road,
Willowbrook East Industrial Estate

Iceni Projects Limited on behalf of Corby
Limited

July 2020

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ON BEHALF OF CORBY
LIMITED

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Planning Statement
TEMPORARY COMPOUND AREA AT LAND EAST OF
SHELTON ROAD, WILLOWBROOK EAST INDUSTRIAL
ESTATE

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1. INTRODUCTION

1.1 This Planning Statement has been prepared in support of a planning application by Corby Limited (referred to hereafter as 'the applicant') for a temporary construction access and compound area on Land East of Shelton Road (grid reference 491409,290980). It will facilitate the construction of the approved Energy Recovery Facility (ERF) at Willowbrook East Industrial Estate, Shelton Road, Corby, NN17 5XH (ref. 19/00027/WASFUL approved 04/10/19).

1.2 The description of development is as follows:

"Formation of temporary construction compound with associated access"

1.3 As the proposed access and compound will be solely used to construct the ERF, it is classed as a "County Matter" and is therefore submitted to Northamptonshire County Council as the determining authority. "County Matters" are defined in schedule 1 of the Town and Country Planning Act 1990 and the Town and Country Planning (Prescription of County Matters) (England) Regulations 2003. This includes the use of land or the carrying out of operations which are ancillary to waste operations.

1.4 In usual circumstances a temporary construction compound would be permitted development under Part 4, Class A of the General Permitted Development Order (2015). However, as the proposed site is not immediately adjacent to the ERF, a planning application is required.

1.5 This Planning Statement sets out the relevant planning background to the proposal, presents the application scheme and demonstrates how the planning issues associated with the development have been addressed and how they comply with planning policy at local, regional and national level.

1.6 The application will facilitate the construction and delivery of a sustainable, localised, ERF that converts residual waste into heat and electricity. In this regard, the proposed development helps meet national and local policies for the development of both renewable energy sources and sustainable waste management practices.

1.7 This Planning Statement should be read in conjunction with all other plans and reports which accompany this planning application:

- Site Location Plan;
- Proposed Site Layout and Elevations;
- Preliminary Geo-Environmental Assessment;

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- Ecology Summary, Preliminary Ecological Appraisal, Botanical Survey Report, Otter Survey, Hedgerow Report;
 - Construction Transport Management Plan; and
 - Flood Risk and Drainage.

1.8 The Planning Statement is structured as follows:

- Section 2 of this Statement sets out the relevant background to the application site;
- Section 3 outlines the development proposals;
- Section 4 provides an assessment of planning policy and considers the proposal in the context of the Development Plan, national policy guidance and other relevant guidance published by statutory bodies;
- Section 5 assesses the relevant matters in the consideration of the planning, including the principle of development; and
- Section 6 provides conclusions and summarises the planning benefits of the application.

2. RELEVANT BACKGROUND

Site Context and Description

- 2.1 The application site is located to the northeast of the Willowbrook Industrial Estate, approximately 2.5km northeast of Corby's town centre. The application site, which is generally flat in terms of topography, has an area of 1.85 ha. It lies to the immediate west of the roundabout on the Corby Northern Orbital Road to the north and the east.
- 2.2 This area previously formed part of a quarry, which has now been infilled and the land is currently vacant. This site has previously been prepared for industrial development, including the construction of the spur road off the Corby Northern Orbital Route which the proposal will utilise.
- 2.3 The site is not located within, adjacent to or in close proximity to any Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar Site. The location of the proposal is not within, nor is it in close proximity to, a National Park, Area of Outstanding Natural Beauty (AONB) or Heritage Coast designation.

Surrounding Land Uses

- 2.4 The north-east of Corby is largely dominated by industrial development. To the west of the site, a large tract of the Willowbrook East Industrial Estate, extending from Shelton Road to Phoenix Parkway, is occupied by a car storage and distribution operation. In addition to this, there are a range of light industrial units within the industrial estate located to the south of the site and fronting along Steel Road. To the south of the site, there is an extension of the industrial estate with further light industrial units, which also share access onto Shelton Road.
- 2.5 The newly-constructed relief road is located adjacent to the north of the application site, whilst Rockingham Motor Speedway is situated 340m to the north.
- 2.6 The site is well-removed from any sensitive land uses or receptors. The Corby Academy and the Priors Hall urban extension scheme, comprising of a large scale residential and employment scheme, is situated further east of the application site (400m).

Relevant Planning History

- 2.7 According to the Corby Borough Council website, the site has not been subject to any planning applications.

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- 2.8 Of relevance to this planning application is the approval of an Energy Recovery Facility (ERF) on the western side of Shelton Road (ref. 19/00027/WASFUL approved 04/10/19). Consent was granted for the construction of an ERF comprising proven combustion technology with an education and visitor centre, access, landscaping and associated works.
- 2.9 The temporary construction compound area subject of this planning application is required to facilitate the construction of 19/00027/WASFUL.

3. DEVELOPMENT PROPOSALS

3.1 The description of development for this planning application is as follows:

“Formation of temporary construction compound with associated access”

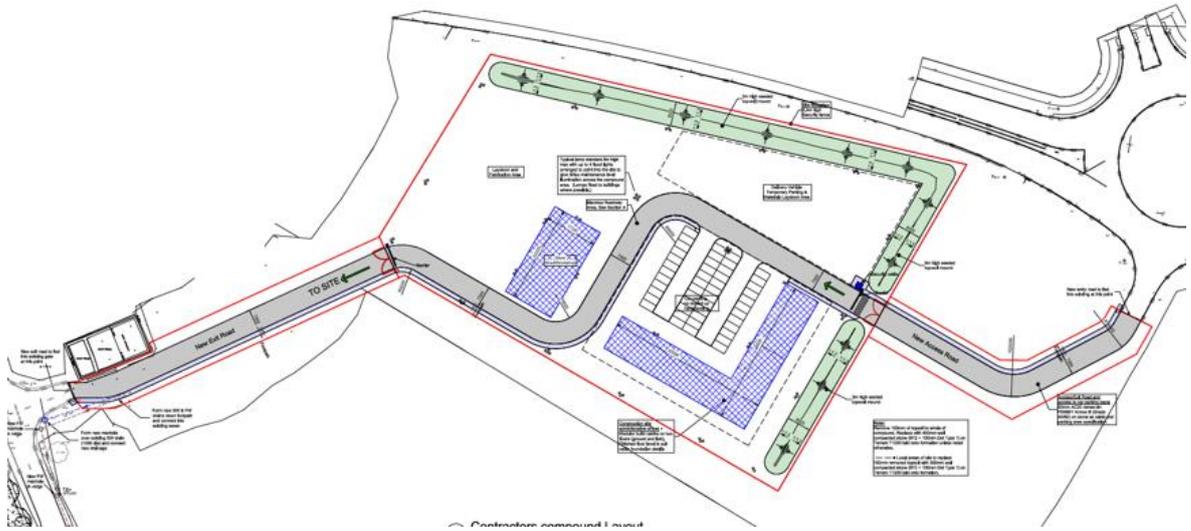
3.2 The proposed development will enable the construction of an approved ERF to the west of Shelton Road. The consented facility will treat residual waste material after the recyclable material has been removed, with a capacity of up to 260,000 tonnes-per-annum (tpa). The development will generate up to 23 MWe (megawatts electrical).

3.3 The proposed site compound will house two groups of portable buildings and areas for managing the construction delivery vehicles. The main features of the development are as follows:

- New bound access road connecting Shelton Road to the west and the roundabout to the east. Wheel washing will be available if vehicles become muddy, as detailed in the Construction Transport Management Plan submitted with this application;
- Workshop and storage shed located near the centre of the site (maximum height of 10m);
- Construction and administration offices within two-storey cabins, including changing accommodation and messing facilities located at the southeast corner of the site (maximum height of 5m);
- Laydown area with compacted gravel surface on geotextile;
- Security cabin, fencing and vehicle barriers;
- 15cm of topsoil will be removed and stored in mounds along the northern and eastern boundaries. The mounds will be 3m in height and seeded to provide screening of the activities; and
- Site management car parking with 48 car parking spaces. Each parking space will be 5m in length x 2.5m in width.

3.4 Please refer to the layout plan submitted with the planning application for further information.

Figure 3.1 – Site Layout



3.5 Consent for these proposals is sought for a temporary period until December 2025, which we expect will be controlled via a planning condition. Following construction of the ERF to the west of Shelton Road, the structures on the subject site will be removed and the ground reinstated using the topsoil stored as bunds along the north and eastern boundaries.

4. PLANNING POLICY

- 4.1 This section provides an assessment of planning policy and considers the proposal in the context of the Development Plan, national policy guidance and other relevant guidance published by statutory bodies.

Local Planning Policy

Northamptonshire Minerals and Waste Local Plan (July 2017)

- 4.2 The Northamptonshire Minerals and Waste Local Plan (Northamptonshire MWLP), or the Local Plan, is the land-use planning strategy for minerals and waste-related development in the county.
- 4.3 The Plan provides the basis for determining applications for, or covering, minerals and waste-related development in Northamptonshire, setting out the broad strategy and vision for development up to 2031.
- 4.4 ‘Policy 11: Spatial Strategy for Waste Management’ requires Northamptonshire’s waste management network, particularly advanced treatment facilities with a sub-regional or wider catchment, to be focused within the central spine and the sub-regional centre of Daventry. The application site is located within the central spine.
- 4.5 ‘Policy 12: Development Criteria for Waste-Management Facilities’ of the Plan sets out a criteria-based assessment for waste management facilities.
- 4.6 The Local Plan contains a number of policies covering detailed environmental considerations which are addressed in this Planning Statement and the technical reports which accompany this application.

North Northamptonshire Joint Core Strategy 2011 – 2031 (July 2016) [Part 1 of the Local Plan]

- 4.7 The North Northamptonshire Joint Core Strategy (JCS) was adopted in July 2016. It is the strategic Part 1 Local Plan for Corby, East Northamptonshire, Kettering and Wellingborough. Whilst there are a number of policies which will be relevant in the determination of this particular planning application, the most relevant are detailed below.
- 4.8 ‘Policy 1 – Presumption in Favour of Sustainable Development’ seeks to approve development proposals “*that improve the economic, social and environmental conditions in the area **meeting the challenges of climate change** and protecting and enhancing the provision of ecosystems services.*”

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- 4.9 'Policy 4 – Biodiversity and Geodiversity' seeks to protect and enhances biodiversity and features of geological interest. The site is located within the Nene Valley Nature Improvement Area where developments should aim to improve ecological connectivity and enlarge existing biodiversity assets.
- 4.10 'Policy 21 – Rockingham Forest' seeks to regenerate this area to increase carbon storage, strengthen biodiversity, landscape character and green infrastructure, support a prosperous rural economy and provide appropriate leisure and recreational opportunities.
- 4.11 'Policy 22 – Delivering Economic Prosperity' outlines the need for additional economic development in the Borough, whilst 'Policy 23 – Distribution of New Jobs' states that of the 31,100 additional jobs required between 2011 and 2031, 9,700 of which will be located in Corby. The development proposals should be viewed favourably in this regard and will help to stimulate both short-term and long-term economic development.
- 4.12 A key factor in North Northamptonshire becoming more self-reliant and resilient is ensuring that it generates a significant proportion of its own energy requirements from renewable sources as stipulated in 'Policy 26 – Renewable and Low Carbon Energy'.
- 4.13 The site is located within the 'Rockingham Motor Racing Circuit Enterprise Area' designated under Policy 27. It is identified as a focus for employment development within and beyond the plan period.

Part 2 of the Local Plan

- 4.14 Whilst Part 2 of the Local Plan has not yet been adopted, it can be afforded some material weight in the determination process as it has now been submitted for examination. It is worth noting that the Employment Land Review (produced in May 2018), which forms part of the Plan's evidence base, recognises the importance of enhancing energy efficiency in the Borough.
- 4.15 In addition to this, and in respect of energy use, the Sustainability Appraisal defines one of its core objectives to *"mitigate climate change by minimising carbon-based energy usage by increasing energy efficiency and to develop North Northamptonshire's renewable energy resource, reducing dependency on non-renewable resources"*.
- 4.16 The draft proposals map continues to identify the site as being within the Nene Valley Nature Improvement Area.

5. MATERIAL PLANNING CONSIDERATIONS

Principle of Development

- 5.1 Consent is sought for a temporary construction compound and access road until December 2025. The proposed development will be used solely for the purposes of constructing an ERF to the west of Shelton Road. The facility itself has already been approved under reference 19/00027/WASFUL in October 2019. There has been no material change in circumstances or planning policy since the approval.
- 5.2 The application site is located within the designated 'Rockingham Motor Racing Circuit Enterprise Area', with Policy 27 of the North Northamptonshire Joint Core Strategy identifying this area as a focus for employment development. The proposed development will not only support construction jobs and the local economy up to 2025, but it will also enable permanent and operational employment at the Shelton Road ERF once construction is complete. The site subject of this planning application will then be reinstated, allowing it to be redeveloped for alternative employment uses in the future.
- 5.3 As such, the principle of development is supported by planning policy, a recent planning approval and demonstrated need. The proposal can be considered to constitute sustainable development as outlined in the NPPF.

Ecology and Trees

- 5.4 As outlined in the Preliminary Ecological Appraisal submitted with this planning application, the majority of the site comprises of grassland, with some small areas of dense scrub and hardstanding. The Preliminary Ecological Appraisal identifies potential for two Priority Habitats to be present on the site. These are potentially identified as HPI Open Mosaic Habitats on Previously Developed Land and HPI Lowland Meadows. As a result, a detailed botanical survey was undertaken which confirmed that no nationally rare or scarce species are present and that the two potential Priority Habitats do not meet the required HPI definition. As such, the surveys undertaken on the site and submitted with the planning application are considered sufficient to provide a robust assessment of ecological botanical interest.
- 5.5 The proposed development will not impact any designated ecological sites. A portion of species poor hedgerow will be removed to make way for the proposed temporary access road. This is temporary for the duration of the development, and the gap in the hedgerow will be reinstated once construction of the ERF is complete and the compound area removed. A Hedgerow Report has been submitted with the planning application, which recommends the restored hedgerow must be planted with native varieties (Hawthorn 50%, Field Maple 20% and other species 15%).

5.6 Opportunities for biodiversity enhancement have been considered in accordance with national and local planning policies and the site's location within the Nene Valley Nature Improvement Area. The following will be installed on the site to improve biodiversity:

- 3 x Schwegler 2F bat boxes;
- 3 x Schwegler 1B nest boxes;
- 3 x Schwegler insect nesting aids; and
- Planting/seeding which is suitable for a range of invertebrates to provide a food source for foraging bats.

5.7 The proposed development is therefore consistent with the aims of Policy 4 of the Joint Core Strategy and Policy 20 of the Northamptonshire MWLP.

5.8 An Otter Report has been submitted with the application which confirms no records of Otter were returned within 500m of the site. Reptile and breeding bird surveys are being undertaken to confirm the absence of any important wildlife and the need for mitigation measures. The survey results will be provided in August 2020.

Transport and Highways

5.9 The principle of constructing the ERF west of Shelton Road has already been established. The previously approved planning application (ref. 19/00027/WASFUL) included an assessment of construction traffic. It found that when compared to the potential traffic generation of the current use, the construction traffic would have a neutral effect on all roads.

5.10 The proposed development will ensure construction of the approved ERF will be undertaken in a safe and appropriate manner. A new temporary bound access road connecting with Shelton Road to the west and to the existing spur off the roundabout to the east will be formed, as well as parking and laydown areas to manage delivery vehicles. The section of Shelton Road that will be temporarily used by construction traffic to access the ERF is a cul de sac which is not used by any other traffic. In order to minimise impacts, a Construction Transport Management Plan has been prepared and is submitted with the planning application.

5.11 As a result of following the measures outlined in the Construction Traffic Management Plan, the operations are unlikely to have amenity impacts and will comply with Policy 26 of the Joint Core Strategy.

Noise and Air Quality

- 5.12 There are no residential properties within close proximity of the site. The proposed temporary road will be bound, and vehicle wheel washing will also be available if vehicles become muddy due to adverse weather. These will help to prevent dust and dirt on the public highway. Furthermore, the proposals do not include any temporary fixed plant (such as concrete batching plant). The impact of construction and the associated traffic on local air quality and noise levels has already been assessed as negligible under planning consent 19/00027/WASFUL.
- 5.13 With regards to minimising the potential air quality and dust impacts, the Construction Environment Management Plan including regular spraying with water will reduce any associated risks. The following best practice measures will be implemented during the construction phase:
- ensure effective site planning locating layout machinery and dust causing activities away from sensitive receptors;
 - erect solid barriers around noisy equipment where necessary to mitigate noise emissions and ensure these are kept clean at all times;
 - all vehicles should switch off engines when not in use i.e. no idling vehicles should occur on site;
 - no site runoff of water or mud should be allowed so that trackout off-site is avoided;
 - ensure stockpiles are kept for the shortest time possible and, if necessary, the use of sprinklers and hoses for dampening of exposed soil and materials should be employed;
 - ensure an adequate supply of water on site if using sprinklers and hoses for dust suppression;
 - where possible, enclosed chutes and covered skips should be used;
 - observation of wind speed and direction prior to conducting dust-generating activities to determine the potential for dust nuisance to occur, avoiding potentially dust generating activities during periods when wind direction may carry dust into sensitive areas and avoiding dust-generating operations during periods of high or gusty winds;
 - stockpiles of soils and materials should be located as far as possible from sensitive properties, taking account of prevailing wind directions and seasonal variations in the prevailing wind;
 - completed earthworks should be covered or vegetated as soon as is practicable;
 - regular inspection of local highways and site boundaries to check for dust deposits (and removal if necessary);

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- visual inspection of site perimeter to check for dust deposition (evident as soiling and marking) on vegetation, cars and other objects and taking remedial measures if necessary;
 - use of dust-suppressed tools for all operations;
 - ensuring that all construction plant and equipment is maintained in good working order;
 - ensure an adequate supply of equipment on site to clean any dry spillages;
 - only use registered waste carriers to remove waste from site;
 - no unauthorised burning of any material anywhere on site;
 - construction vehicles should be kept clean and sheeted when on public highways. Timing of large-scale vehicle movements to avoid peak hours on the local road network will also be beneficial.

5.14 With the above considered, the proposal will not result in any significant effects. Noise and air quality during construction has already been approved and best practice mitigation measures will protect local amenity. As such the proposals can be considered to comply with Policy 8 of the Joint Core Strategy and Policy 18 of the Northamptonshire MWLP.

Flood Risk and Drainage

5.15 According to the Environment Agency's flood map for planning, the site is located entirely within Flood Zone 1 (low risk). This flood zone relates to land that has an annual probability of flooding of less than 0.1% and is considered to be appropriate for all types of development (as set out in Table 3 of the NPPF Technical Guidance). As the site is larger than 1 ha, a flood risk assessment has been submitted with the planning application in accordance with Paragraph 103 of the NPPF. Based on a review of the Corby SFRA no other recorded sources of flooding, i.e. from sewers, groundwater or reservoir, have been identified. Topographic levels indicate the Site has a freeboard of approximately 9.78m above the 0.1% annual probability event.

5.16 A drainage assessment has also been included to consider the feasibility of various SUDS techniques. A detailed drainage design will be undertaken in due course to ensure the proposed development complies with Policy 18 of the Northamptonshire Northamptonshire MWLP. The attenuation system would discharge through the dedicated surface water sewer on-site to the mains surface water sewer located on Shelton Road, adjacent to the western boundary of the Site which subsequently discharges to the Willow Brook North Arm watercourse. All drainage would be routed to the ultimate point of discharge by gravity.

Landscape, Heritage and Archaeology

- 5.17 The site is located next to an industrial area and is not located in any sensitive landscape or heritage areas. The nearest protected site is the Grade II listed building at Weldon Lodge located 400m northeast. 2km to the northeast is Kirby Hall, an Elizabethan country house and garden located. It is a scheduled monument, registered garden, Grade I listed hall and various Grade II listed structures. There will not be any impact due to the distance and intervening landscape.
- 5.18 The topsoil from the site will be used to form a mound along the northern and eastern boundaries of the compound area which will help to screen and mitigate any visual impacts. Furthermore, as the proposed development is temporary, any impacts would be reversed following the reinstatement of the site.
- 5.19 The proposal will conserve the landscape and minimise visual impacts as required by Policy 3 of the Joint Core Strategy and Policy 18 of the Northamptonshire MWLP.
- 5.20 Historical activities at the site are limited to open cast ironstone quarrying with backfill of overburden as part of a much wider area of quarrying. No Historic Environment Record data has been identified on site and no non-designated buried archaeological remains are predicted to have survived the quarrying. As a result, the proposed development is not predicted to result in a direct physical effect on buried archaeological remains.
- 5.21 In terms of lighting, this is shown on the layout plan submitted with the application. This will comprise of typical standard lamps on 8m high posts. These will have up to 4 flood lights each which are directed into the site to minimise light spillage, with 50lux maintenance level illumination across the compound area.

Ground Conditions

- 5.22 A Preliminary Geo-Environmental Assessment has been prepared by Delta Simons and is submitted with this planning application. It finds that the ground conditions were generally consistent across the site, comprising firm, slightly gravelly clay (Made Ground), with occasional cobbles of limestone, ironstone and occasional brick, with rare slag, concrete, wire, plastic. The ground conditions are typical of this area of Corby.
- 5.23 No current or historical sources of significant potential contamination have been identified. No potential contamination was identified during the trial pitting and no exceedances of the relevant Generic Assessment Criteria (GAC) were identified through laboratory testing.
- 5.24 Soil contaminant concentrations are not considered likely to represent a significant risk to human health. Some asbestos was detected but potential risks can be mitigated through standard good

practice during the site strip (e.g. damping down exposed soils), and capping all trafficked areas on the site with geotextile and type 1 hardcore to provide a pathway break. Vegetation/grass cover will minimise the potential for dust release and exposure from the perimeter bunds. No potential risks to controlled waters and no viable sources of ground gas have been identified.

5.25 The report confirms no further investigation or assessment should be required for the proposed development. The following recommendations are made;

- Imported hardcore will require testing to confirm suitable for use prior to use on the Site, unless clean natural aggregate;
- Exposed soils should be damped down to minimise dust generation during preparatory earthworks;
- As with all Brownfield sites, groundworkers and sub-surface maintenance workers should be made aware of the possibility of encountering contaminated soils and groundwater through toolbox talks. Safe working procedures should be implemented, good standards of personal hygiene should be observed and appropriate levels of personal protective equipment (PPE) provided and utilised; and
- Waste classification has not been undertaken as part of the scope of works, should it be proposed to dispose of materials from the Site then specific additional investigations may be needed to classify the materials in accordance with current regulatory requirements.

6. SUMMARY AND CONCLUSIONS

6.1 This Planning Statement has been prepared in support of a planning application by Corby Limited for a temporary construction access and compound area. It will facilitate delivery of the approved ERF at Shelton Road which was approved in October 2019 under ref. 19/00027/WASFUL. As such it is classed as associated development for a waste facility and is therefore submitted to Northamptonshire County Council.

6.2 The description of development is as follows:

“Formation of temporary construction compound with associated access”

6.3 Consent is sought for a temporary period until December 2025, which can be controlled via a planning condition. The proposal will facilitate the delivery of an approved ERF. Once construction of the has been completed in 2025, the structures on the subject site will be removed and the ground reinstated using existing topsoil.

6.4 This Planning Statement has set out the relevant planning background to the proposal, presents the application scheme and demonstrates how the planning issues associated with the development have been addressed and how they comply with planning policy at local and national level.

6.5 The proposal is considered to accord with all relevant planning policies and will provide the following benefits:

- Enable the delivery of an ERF which will make a significant contribution towards renewable energy production and waste management in the county;
- Provide construction jobs and employment up to 2025 in line with the ‘Rockingham Motor Racing Circuit Enterprise Area’;
- Provide opportunities for biodiversity enhancement; and
- Is of a temporary nature which will not sterilise the land, with the site reinstated and returned to its current condition following construction.

6.6 As demonstrated by both this Planning Statement and the supporting documentation the Proposed Development is considered acceptable. Consequently, we consider that planning permission should be granted, having regard to relevant guidance and the clear planning justification for the development.