

PRIORS HALL PARK

Urban&Civic

Phased Extraction of Minerals- Planning Application

January 2021

Planning Statement

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1.0 INTRODUCTION

Introduction

1.1 This document is a Planning Statement ("Statement") prepared by David Lock Associates ("DLA") to support a full planning application submitted to Northamptonshire County Council on behalf of Urban & Civic Plc (U&C) ("the Applicant") for minerals (limestone) extraction for use as a building material within Priors Hall Zones 2/3 Urban Extension, Corby ("the application site"). The application site is situated within the wider Priors Hall Park Urban Extension, east of Corby.

1.2 The formal description of development, sought through this application, is for:

"Phased extraction of limestone and re-use on site to facilitate the development of the Priors Hall Zones 2 and 3 urban extension (outline application reference: 19/01219/OUT and 19/00351/OUT). Works to comprise:

- *removal and temporary storage of overburden;*
- *extraction of limestone;*
- *processing of minerals on site to form appropriately sized/ quality building material;*
- *temporary construction compound;*
- *backfilling of extraction zones to original levels with engineered fill, overburden and excess clay from earthworks surcharge process elsewhere on site.'*

1.3 The Priors Hall site is owned by Urban & Civic and is located to the east of Corby. It lies partly within Corby Borough (CBC) (Zones 1 and 2) and East Northamptonshire (ENC) (Zone 3). Historically, much of Zone 2 and some of Zone 3 (south) has been quarried for ironstone and subsequently restored. The application site is shown in context on the accompanying Site Location Plan (Appendix A).

1.4 The benefits of the proposed extraction are significant. Extraction of the existing limestone resource at this stage, prior to development will ensure that an important mineral resource is not sterilised by the wider Priors Hall scheme. It will also have substantial sustainability benefits as critically, it will significantly reduce the need to import building materials on site via HGV, reducing a significant number of HGV networks on the wider highway network.

1.5 A cycle of sustainable natural resource use will be maintained within the site resulting in no waste material. All excavated material will be utilised within the development and excess material from the earthworks scheme will be used to backfill the extraction areas. It is anticipated that up to 59,202m³ of limestone will be extracted.

1.6 This Planning Statement is submitted as supporting information for the planning application and sets out:

- background and history of the site;

- context and description of the proposals;
- consideration of the landscape / visual impact of the scheme;
- assessment of the scheme against planning policy and justification.

Application Documentation

1.7 This Statement forms part of a suite of formal planning application documents which should be read as a whole. The submitted documents include:

- application forms;
- covering letter;
- application drawings, including:
 - UAC047-052 Rev G – Priors Hall Mineral Extraction – Site Location Plan
 - 019934-RPS-MI-XX-DR-C-0705-P03-Minerals Extraction Application Key Plan including Site Compound and Access Schematic Arrangement
 - 019934-RPS-MI-XX-DR-C-0710-P02-Minerals Extraction Application Overburden
 - 019934-RPS-MI-XX-DR-C-0711-P02-Minerals Extraction Application Limestone
 - 019934-RPS-MI-XX-DR-C-0780-P02-Minerals Extraction Application Typical Sections
 - 2564PS - Crossing Section with Groundwater - Nov 20
 - 2564-114 - Priors Hall Extent of Historic Quarrying
- Application supporting reports, including:
 - Planning Statement (DLA)
 - Extraction Method Statement (MAPA)
 - Geotechnical Appraisal (Shadbolts)
 - Code of Construction Practice (RPS)
 - Noise Impact Assessment (RPS)
 - Flood Risk Assessment (RPS)
 - Dust Impact Assessment (RPS)

- Heritage Statement (Cotswold Archaeology)
- Arboricultural Statement (Delta Simons)
- Ecology Statement (Delta Simons)
- Restoration Aftercare Statement (EDP)

2.0 SITE DESCRIPTION & CONTEXT

Location

- 2.1 The application site sits within the wider Priors Hall site, east of Corby, owned by Urban and Civic who act as the Master Developer. The wider Priors Hall urban extension site lies within Corby Borough (CBC) (Zones 1 and 2) and East Northamptonshire (ENC) (Zone 3) – see Figure 1 overleaf. Historically, much of Zone 2 and some of Zone 3 (south) has been quarried for limestone and subsequently restored.
- 2.2 The parcels to which the application relates are contained within Zone 3 (East Northamptonshire).
- 2.3 The scheme comprises two areas of minerals extraction. Whilst the limestone seam is thought to be present more widely across Zone 3, the prohibitive cost of piling foundations to support development post extraction, have resulted in extraction areas being identified only where the future use, as defined by the outline Development Framework Plan, is open space or non built development. The proposed areas of extraction are as follows:
- Area A (1.95ha) – north west of Zone 3 – area for future allotments/ formal open space;
 - Area B (2.25ha) – site of planned 'KP4 gateway' landscaping scheme; and
- 2.4 Zone 3, within which Areas A and B are located, is situated to the north east of the existing Zone 1 development immediately to the east of the existing Lloyds data centre. It is bound to the North by Kirby Lane and a belt of woodland planting, beyond which (by some 500m) lies the listed Kirby Hall. Zone 3 is bisected by the Willow Brook which runs west-east through the site. An area of woodland known as Badgers Wood is located south of the brook. The site of a former Roman Villa has been identified in the central part of Zone 3. Beyond Zone 3 to the south, are two Local Wildlife Sites running north-south on either side of Zone 2.

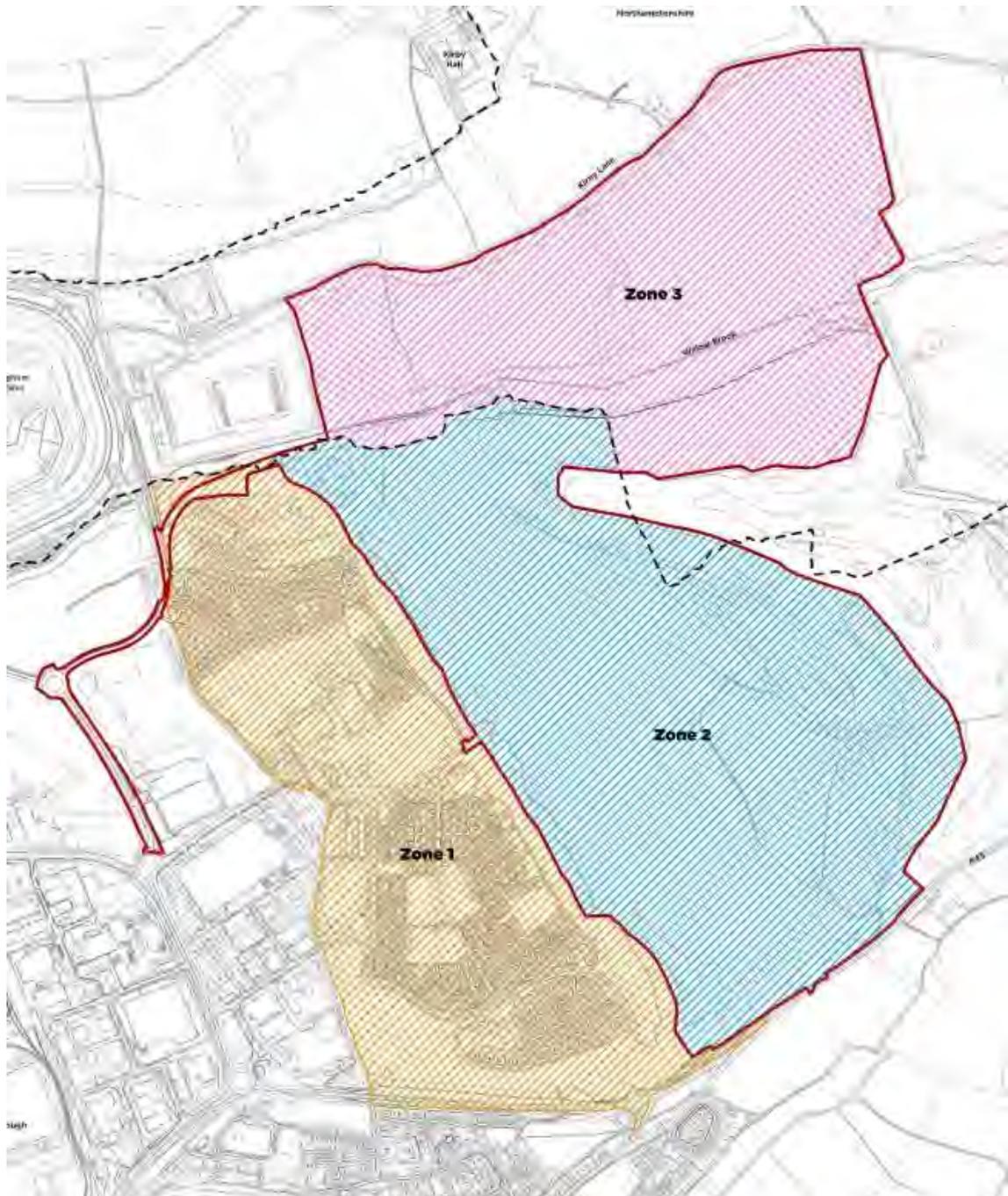


Figure 1 – Priors Hall Zones

Background

2.5 Priors Hall has been earmarked by Corby Borough Council as a site for strategic scale development since its allocation for commercial and recreational development in the Corby Local Plan (1997). Outline planning permission for an urban extension of 5,100 dwellings at Priors Hall was granted by ENC and CBC in 2012 and 2007 respectively. The majority of Zone 1, adjacent to the existing urban edge of Corby has been developed pursuant to this original outline consent.

- 2.6 In 2017, Urban & Civic purchased the Priors Hall site with the intention of completing Zone 1 and reviewing the master plan for Zones 2 & 3. This latter process has resulted in a revised Zone 2 / 3 masterplan, which accommodates a modest increase in dwelling numbers (c. 220 units), therefore requiring a new outline planning application. Accordingly, a new duplicate outline application for Zones 2 & 3 was submitted to ENC (ref: 19/01219/OUT) and CBC (ref: 19/00351/OUT) in July 2019 and have both been unanimously approved at Planning Committee, with a resolution to grant planning permission subject to the signing of the Section 106 agreement, which is expected before the end of January 2021.
- 2.7 In advance of a new outline planning consent being granted on Zones 2 and 3, U&C also submitted a planning application to carry out a scheme of preparatory earthworks required to facilitate the Zone 2 and 3 proposals contained within the new OPA. The earthworks, now approved, are located in Zones 2 and Zone 3 south (the site of the former quarry). The works will excavate, reengineer, compact, surcharge and reprofile the existing quarry backfill material to provide development platforms. Works have started on site and will continue on a phased basis for a number of years, working south to north, from the A43.
- 2.8 Since submission of the outline planning application, ongoing ground investigations have revealed a seam of limestone within Zone 3 some 1m to 6m in depth. This planning application seeks to allow U&C to extract the limestone for use as a building material in the development of the Zone 2 and 3 outline scheme, principally for road construction. The proposals are outlined further in Section 4 of this Statement. The site context plan at Appendix B illustrates the location of the extraction areas superimposed on the proposed outline Development Framework Plan.

Relevant Planning History

Minerals Planning History

- 2.9 Minerals extraction has a long history at Priors Hall. The original 1997 permission was issued under the Review of Planning permission provisions in the Environment Act 1995 (refs: EN/97/145C and CO/97/55C). The description of development is replicated below:
- 'Extraction of Northampton sand ironstone and overlaying minerals' at Priors Hall, Weldon.*
- 2.10 The consent covered the area now known as Zone 1 of Priors Hall, as the area south of the Willow Brook in Zones 2 and 3 had previously been worked and restored, as part of the previous ironstone quarry.
- 2.11 Northamptonshire County Council have advised, as part of pre-application enquiries, that the 1997 permission was superseded by the 2006 permission, which was a S73 application to modify conditions attached to the above consents, submitted by Corby Developments Limited (ref: CO/06/91C).

Urban Extension Planning History

- 2.12 Until the Zone 2 & 3 applications currently under consideration by Corby Borough and East Northamptonshire Councils are granted consent (refs: 19/01219/OUT and 19/00351/OUT respectively), the wider Site benefits from existing outline planning consents that have been subsequently revised for various reasons. Details are set out below.
- 2.13 The original outline application for the Priors Hall Park mixed use urban extension to Corby was submitted in July 2004 and approved in March 2007 by Corby Borough Council and February 2012 by East Northamptonshire Council (refs: 04/00240/OUT & 04/01326/OUT).
- 2.14 An application to vary condition 4 of the planning consents was submitted in 2013 (refs: 13/00026/RVC & 13/00288/EXT). The application involved the submission of a revised Development Framework Plan and associated Land Use Budget and Affordable Housing Distribution Plan, and saw a variation of the S106 agreement. The wording of condition 4 was amended to require accordance with a new revision of the Development Framework Plan which defined Zone 1 as a first phase. Zone 1 has been subject to multiple approvals of reserved matters and is largely built out. The CBC decision notice in this instance formed a new outline planning permission.
- 2.15 An application for the Zone 3 link road to provide highway access from the west of the site (Gretton Road) into the north of Zones 1, 2 and 3 of the Priors Hall site (16/00281/DPA). The application was approved in November 2016 and the western extent is currently under construction. When complete it will serve as the main vehicular access to the north of Zone 2 and 3.

Earthworks Planning History

- 2.16 In advance of the new outline planning consent, Urban & Civic submitted a planning application to carry out the necessary earthworks required to form stable development platforms for the Zone 2 and 3 proposals contained within the new Zones 2 & 3 outline planning application on land within the site of the former quarry. The earthworks are now consented and being undertaken to excavate, engineer, compact, surcharge and reprofile the existing quarry backfill material to provide development platforms. The works will continue on a phased basis for a number of years, working south to north, from the A43.
- 2.17 The earthworks applications' (19/00084/DPA (CBC) and 19/00336/FUL (ENC)) description of development is reproduced below:

'Application for cut and fill earthworks within Zone 2 and Zone 3 (south) of Priors Hall Park, including the excavation, reengineering, compaction, surcharging and reprofiling of existing quarry backfill material, to provide development platforms and facilitate future development and the removal/treatment of any contamination of any contamination encountered during the works, construction of a temporary works compound, haul routes and boundary treatments to secure the site perimeter.'

- 2.18 It is anticipated that some of the excess material resulting from these earthworks will be used to backfill the minerals extraction areas.

3.0 APPLICATION PROPOSALS

The Proposed Development

3.1 Formally, this application seeks the following:

"Phased extraction of limestone and re-use on site to facilitate the development of the Priors Hall Zones 2 and 3 urban extension (outline application reference: 19/01219/OUT and 19/00351/OUT). Works to comprise:

- *removal and temporary storage of overburden;*
- *extraction of limestone;*
- *processing of minerals on site to form appropriately sized/ quality building material;*
- *temporary construction compound;*
- *backfilling of extraction zones to original levels with engineered fill, overburden and excess clay from earthworks surcharge process elsewhere on site.'*

3.2 The parcels to which the application relates are contained within Zone 3 (East Northamptonshire).

3.3 The scheme comprises two areas of limestone extraction. Whilst the limestone seam is thought to be present more widely across Zone 3, the prohibitive cost of piling foundations to support development post extraction, have resulted in extraction areas being identified only where the future use, as defined by the outline Development Framework Plan, is open space or non built development. The proposed areas of extraction are as follows:

- Area A (1.95ha) – north west of Zone 3 – area for future allotments/ formal open space;
- Area B (2.25ha) – site of planned 'KP4 gateway' landscaping scheme; and

3.4 Extraction, subsequent backfilling and making good will be undertaken one parcel at a time, on a phased basis, so as to maintain a steady flow of building material without the need to create stockpiles. U&C envision that the process will become an (early) element of the construction works involved in developing Zones 2 and 3.

3.5 Material will be removed from each area, processed on site and then transported as quickly as possible to where it is needed on site. The construction works will be programmed to ensure that the extraction works are timed so material is ready for use, when it is required. Zone 3 will be built out from west to east, with the first phase, known as Key Phase 4 (KP4) containing extraction parcels A and B. Consequently the limestone from these areas will be extracted first and used for the construction of roads within Zone 2, where development will be starting concurrently, as soon as the outline and subsequent consents are issued. Once extraction from parcels A and B is complete, the development of KP4 can commence,

including the implementation of the landscape / open space schemes on the parcels themselves.

- 3.6 The extraction process will involve the removal of topsoil and a layer of clay before extracting the limestone to a potential depth of c.4 metres beneath the surface layer. The exact depths and the location of the limestone deposit are being tested further through additional boreholes, however based on existing ground investigation data available to date it is likely that extraction is unlikely to exceed 4m depth. Following extraction, the areas will be backfilled with the original overburden, excess clay resulting from the earthworks surcharge process on Zones 2 / 3 (south) and engineered fill.
- 3.7 The processes used to recover the material will depend on the characteristics of the deposit. In this case the limestone is covered with a thin deposit of clay and topsoil known as overburden, which is not suitable for use as aggregate. This material will be removed and stored for later use in the restoration process once the extraction has finished.
- 3.8 In some cases, hard rock deposits may be required to be broken out of the ground using a jack hammer attached to a 360 excavator. Weaker rocks can be excavated directly, using large tracked excavators into dump trucks or broken using a “ripper” attachment on an excavator or on the back of a dozer. The objective is to fragment the rock to a size suitable for loading and transporting to the on-site plant for further processing, and to do it in a way which is safe and minimises environmental impacts.
- 3.9 Once the material has been removed from the ground, it will be transported to the on-site processing plant (mobile crushing units and screening units) via site vehicles (dumper truck). The main elements of the aggregate processing will be the breaking up of the rock into smaller sizes and fractions to meet the grading requirements, of engineered fill material, in accordance with the specification for Highway Works. In simple terms large pieces of rock will be reduced down to smaller sizes using mobile crushers and screening units.
- 3.10 Importantly, no material will need to be brought on to site to complete this process. A cycle of sustainable natural resource use will be maintained within the site resulting in no waste material. All excavated material will all be utilised within the development and excess material from the earthworks scheme will be used to backfill the extraction areas.
- 3.11 The process will be governed by a Code of Construction Practice, that will control all aspects of the scheme and minimise any risks of pollution or nuisance in terms of noise, vibration and air quality. In the context of the wider, and much more substantial, earthworks that are taking place already, the extraction process is relatively modest and will not be discernible in scale or impact from the earthworks scheme, for which no EIA was required. The CMP would also put in place controls to ensure site safety and any risks to human health during works.

- 3.12 It has been agreed with NCC that no Environmental Impact Assessment will be required for the minerals extraction application proposals, as the supporting reports enable a sufficient assessment of the potential impacts of the development.

- 3.13 The extraction of limestone from each identified parcel and subsequent backfilling will be undertaken relatively quickly, within a period of c. 12 months.

4.0 LANDSCAPE / VISUAL IMPACTS

Landscape and Visual: Summary

- 4.1 The proposed extraction of minerals would not require the removal of any areas of existing vegetation, being located within areas of public open space within the outline application for Zones 2 & 3. As set out within the Restoration and Aftercare Statement submitted with this application, (Report Ref. edp5910_r008), the areas proposed for minerals extraction would be reinstated to grassland to enable the delivery of new public open space, including new landscape features, as part of the overall masterplan for the outline application.
- 4.2 Within the LVIA, of particular note was an 'Area of Tranquillity', located 0.5km east & 1.8km north, which aims to protect tranquillity within the area from urban intrusion, especially from excessive levels of noise, light spillage and traffic. The submitted LVIA found that effects on the Area of Tranquillity during construction would result in *"a combination of minor noise impacts and construction related activity would give rise to Localised, Small scale, Long-term effects on the purposes of designation. These effects would be of Low-Negligible magnitude, Slight-Minimal and Adverse."*
- 4.3 Following a review of the same methodology used to support the outline application for Zones 2 & 3, it is not considered that the phased extraction of minerals would increase the magnitude of change predicted during the construction phase such that it would increase beyond that already assessed by the LVIA. The proposed extraction would be experienced in the short-term, would be reversible and would be fully mitigated in landscape terms on completion.
- 4.4 With regard to operational effects on landscape and visual receptors, the submitted LVIA concluded that *"Moderate effects would arise on landscape character within the site, but not beyond. Effects would be contained due to screening by woodland and tree belts to the north and east and the existing urban influences on character to the west and south. As proposed planting matures it is anticipated that the significance of residual effect will reduce leading to an increasingly integrated settlement"*. With the exception of an Area of Tranquillity, all effects during construction were not considered to be any higher than those predicted during operation, with moderate effects being 'within the site, but not beyond'.
- 4.5 It would remain the case that moderate visual effects would arise on footpaths within the site during the short-term and temporary extraction phase. However, the continuation of ground remodelling within Zone 2, and the completion and operational aspects of the data centre to the west of Zone 3, have further reduced the site's susceptibility to change, including any visual receptors within it.
- 4.6 The Phased extraction of minerals (limestone) for re-use on site, to facilitate development of Priors Hall Zones 2 and 3 urban extension, would not necessitate any changes to the

overall assessment of landscape and visual effects. As such, in all cases, there would be no additional significant effects as a result of the proposed development.

5.0 PUBLIC RIGHT OF WAY

- 5.1 There are several Public Rights of Way (PRoW) within Zone 3 (refer to the Site Context Plan at Appendix B), some of which will be realigned as part of the outline development. However, none of the existing PRoW are located within the extraction application site or are affected by it. In due course and once the extraction works are complete, a new PRoW will be provided through Zone 3, part of which will run through the restored extraction site, as part of the landscaped gateway into the scheme.

6.0 PLANNING POLICY

- 6.1 This section reviews relevant Development Plan policies and other material considerations.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that a planning application must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Development Plans applicable to the wider Priors Hall site and this application are the Northamptonshire Minerals and Waste Local Plan (adopted July 2017) and the North Northamptonshire Joint Core Strategy 2011-2031 (adopted in 2016).

Northamptonshire Minerals and Waste Local Plan

- 6.3 The Northamptonshire Minerals and Waste Local Plan is applicable to all proposals for minerals and waste related development in Northamptonshire.
- 6.4 Policy 1 outlines that provision will be made over the plan period for the extraction of 7.8 million tonnes of crushed rock (limestone). The provision for which will come from extensions to existing sites and new sites if they meet the spatial strategy for mineral extraction and are assessed as meeting environmental, amenity and other requirements of the Local Plan.
- 6.5 Policy 2 contains the spatial strategy for mineral extraction, which is to focus extraction on the county's pre-glacial and glacial deposits together with the reserves from the river valleys of the Nene and the Great Ouse.



Figure 2 – Spatial Strategy for mineral extraction

- 6.6 Policy 3 contains the development criteria for mineral extraction. Proposals for the extraction of minerals from unallocated sites must demonstrate the following criteria:
- does not conflict with the spatial strategy for mineral extraction,

- where relating to aggregates, that it is required to maintain an adequate supply of minerals in accordance with the adopted Local Plan provision rates and / or the maintenance of a landbank,
 - is required to meet a proven need for materials with particular specifications that cannot reasonably or would not otherwise be met from committed or allocated reserves,
 - will maximise the recovery of the particular reserve whilst minimising waste through operational techniques employed, and
 - promotes the most appropriate end-use of materials, and specifically ensure that building and roofing stone is used for high quality end-uses and not aggregate.
- 6.7 In addition to the above, proposals for the extraction of building and roofing stone must specifically demonstrate that it supports the supply of locally sourced building materials; and the principal purpose of the extraction is for building and roofing stone (the proportion of stone and aggregate production should be identified).
- 6.8 Policy 9 (Development criteria for borrow pit extraction) outlines that any proposals for the development of borrow pits must demonstrate that the:
- Borrow pit is in close proximity to the construction project it is intended to supply;
 - Use of the mineral would not constitute an inappropriate use of high quality materials;
 - Mineral can be transported with minimal use of the public highway;
 - Site will be satisfactorily restored either through progressive restoration or as soon as possible following cessation of the construction project it serves, and
 - Inert waste arising or extracted from the construction project is utilised in restoration works (of the borrow pit).
- 6.9 Policy 18 (Addressing the impact of proposed minerals and waste development) requires proposals for mineral development to demonstrate the matters below have been considered and addressed. In addition, a site specific management plan should be developed, where applicable, to ensure the implementation and maintenance of mitigation measures throughout construction, operation, decommissioning and restoration works.
- protecting Northamptonshire’s natural resources and key environmental designations (including heritage assets),

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- avoiding and / or minimising potentially adverse impacts to an acceptable level, specifically addressing air emissions (including dust), odour, bioaerosols, noise and vibration, slope stability, vermin and pests, bird strike, litter, land use conflict and cumulative impact,
 - impacts on flood risk as well as the flow and quantity of surface and groundwater,
 - ensuring built development is of a design and layout that has regard to its visual appearance in the context of the defining characteristics of the local area,
 - ensuring access is sustainable, safe and environmentally acceptable, and
 - ensuring that local amenity is protected. Where applicable a site-specific management plan should be developed to ensure the implementation and maintenance of mitigation measures throughout construction, operation, decommissioning and restoration works.
- 6.10 Policy 19, Encouraging sustainable transport, requires that development seeks to minimise transport movements and maximise the use of sustainable or alternative transport modes. Minerals development should be well placed to serve their intended markets in order to minimise transport distances and movements in order to support the development of sustainable communities.
- 6.11 Policy 20 (Natural assets and resources) requires that minerals development should seek to achieve a net gain in natural assets and resources. In addition, proposals are required to undertake an assessment, where appropriate to:
- Identify and determine the nature, extent and level of importance of the natural assets and resources, as well as any potential impacts; and
 - Identify mitigation measures and/or requirement for compensation (where necessary) to avoid, reduce and manage potentially adverse impacts.
- 6.12 Policy 21 (Landscape character) states that development should seek to reflect Northamptonshire’s landscape character. Development should mitigate potentially adverse impacts on the local character and distinctiveness of Northamptonshire’s landscape where necessary. In addition, where appropriate proposals will be required to undertake a landscape impact assessment.
- 6.13 Policy 22 (Historic environment) outlines that where heritage assets are identified, proposals should seek to conserve and enhance Northamptonshire’s historic environments through the measures detailed within the policy. Proposals for development involving a site which includes heritage assets, including development within the setting of an asset, particularly those with an archaeological interest, will be required to undertake appropriate desk based and/ or field evaluations in order to:

- Identify and determine the nature, extent and level of the significance of each heritage asset, the contribution of its setting to that significance, as well as any potential impacts on the asset or its setting, and
 - Identify the requirement for a programme of post-permission works including any mitigation measures and long term monitoring.
- 6.14 Policy 28 (Minerals Safeguarding Areas) notes that MSAs are designated to safeguard minerals resources from sterilisation. Priors Hall, including this application site, falls within an area defined within the plan as a Limestone Minerals Safeguarding Area (MSA). The majority of the Priors Hall site has already been subject to minerals extraction and the minerals resource removed prior to development. However, this application, in direct accordance with policy 28, seeks to extract the final remaining minerals from the site (Zone 3), before it is developed as the sustainable urban extension in accordance with the outline application, thereby ensuring that this important mineral resources is not sterilised but instead extracted and put to good use on site. This not only makes the best use of the minerals resource, but allows the limestone to be extracted in a phased manner prior to the final development being constructed and then used directly on site to facilitate the construction of the scheme.

National Planning Policy Framework (2019)

- 6.15 The updated National Planning Policy Framework (NPPF) was published in July 2018 and re-published following amendments post consultation (February 2019).
- 6.16 Paragraph 205 of the NPPF instructs that when determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy. Mineral planning authorities should consider the following when assessing a proposal for mineral extraction:
- a) as far as practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty and World Heritage Sites, scheduled monuments and conservation areas;
 - b) ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;
 - c) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties;
 - d) not grant planning permission for peat extraction from new or extended sites;

- e) provide for restoration and aftercare at the earliest opportunity, to be carried out to high environmental standards, through the application of appropriate conditions. Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances;
- f) consider how to meet any demand for small-scale extraction of building stone at, or close to, relic quarries needed for the repair of heritage assets, taking account of the need to protect designated sites; and
- g) recognise the small-scale nature and impact of building and roofing stone quarries, and the need for a flexible approach to the duration of planning permissions reflecting the intermittent or low rate of working at many sites.

7.0 ASSESSMENT AGAINST PLANNING POLICY

- 7.1 The following section of the statement will review the proposal against Development Plan policy, demonstrating clearly that the application should be approved without delay.

Principle of Development

- 7.2 The principle of extracting minerals for use as a construction material nearby is supported by Policy 9 of the NCC Minerals and Waste Local Plan (2017) and the planning application demonstrates that the criteria for borrow pit extraction are fulfilled. Clearly, extracting the minerals prior to development will ensure that an important mineral resource is not completely neutralised by the Priors Hall scheme.
- 7.3 There are also clear environmental benefits to mineral extraction on site, as this will greatly reduce HGV movements and deliveries of road construction material to Priors Hall from elsewhere. The minerals will be used as material for road construction within the site and therefore, no additional movements on the public highway are generated in the extracted mineral's transportation. As outlined in paragraph 1.4 of this Statement, the proposals will significantly reduce the number of HGV movements bringing building materials on site. This is a significant benefit, in accordance with Policy 19 of the NCC Minerals and Waste Local Plan (2017).

Flood Risk

- 7.4 RPS Consulting have produced a 'Flood Risk Assessment' which outlines the potential for the site to be impacted by flooding, the impacts of the proposed development on flooding in the vicinity of the site, and proposed measures that could mitigate any identified risk. The proposed development will be wholly located within Flood Zone 1 and is therefore at low risk of flooding from fluvial and tidal sources. In addition, the site is considered to have a low risk of flooding from all other sources and also is not considered to increase flood risk elsewhere. Therefore, it is considered that the development is in accordance with the relevant section of Policy 18 of the NCC Minerals & Waste Local Plan.

Air Quality/ Dust

- 7.5 RPS Consulting have produced a 'Dust Impact Assessment' which focuses on dust impacts from the excavation works, from both suspended particulate matter and deposited dust once it has fallen out of the air. The Report concludes that the dust effects and PM₁₀ effects on the surrounding area as a whole are predicted to be 'slight' and temporary based on conservative assumptions. This level of effect is considered "not significant" and, on that basis, no additional measures are considered necessary over and above those incorporated into the design of the scheme. Therefore, it is considered that the development is in accordance with the relevant section of Policy 18 & the NPPF, as the potential air quality impacts are only 'slight' and temporary and are therefore at an acceptable level.

Noise

- 7.6 RPS Consulting have produced a 'Noise Impact Assessment' to consider the potential noise effects of the proposed works at the extraction areas A and B in support of the planning application. The Report concludes that the resulting noise levels identified at the Noise Sensitive Receptors (NSRs) do not exceed the Planning Practice Guidance for Minerals (PPGM) criteria, resulting in the noise impacts being considered acceptable. Furthermore, the report outlines that due to the distance and limitation to using mechanical plant and no blasting for the extraction of minerals, vibration should not adversely affect the Data Centre located west of Zone 3. Therefore, the fact that the impacts are at an acceptable level means that the development is in accordance with Policy 18 of the Minerals & Waste Local Plan and the NPPF.

Heritage

- 7.7 Cotswold Archaeology have produced a Heritage Statement to support the application, which considers the potential effects upon known heritage assets – at Kirby Hall & Deene Park and also archaeological heritage assets within Zone 3 relating to the remains of a Roman Villa (protected by an Archaeological Preservation Area).
- 7.8 The proposed development will not impact upon the Kirby Lane Heritage Buffer Development Exclusion Zone, which will be maintained between the Site and Kirby Hall. The Report confirms that the proposed development will have no direct visual impact upon the setting of Kirby Hall.
- 7.9 Furthermore, the report considers that the important elements of the physical surrounds and experience of Deene Park will not be altered by the proposed development, and its heritage significance will remain unharmed.
- 7.10 No development is proposed within the Archaeological Preservation Area, which will be retained as an area of green space. Therefore, the proposed development will not impact upon any archaeological remains within the Archaeological Preservation Area. As outlined in the report, mitigation measures have been identified and agreed as part of the Site Wide Heritage Management Strategy and Plan.
- 7.11 Therefore, the report confirms that no adverse effects have been identified to the setting of Kirby Hall and Deene Park. The report considers that adverse effects upon the archaeological resource can be appropriately mitigated in accordance with the requirements of legislation & policy, and the measures agreed as part of the Heritage Management Strategy and Plan. It is considered that the Report also meets the requirements of Policy 22 of the NCC Minerals and Waste Local Plan (2017).

Arboricultural Method Statement

- 7.12 Delta Simons have produced an Arboricultural Method Statement (AMS). The AMS gives site specific instructions on the methods required to protect the existing tree and hedgerow stock agreed to be retained. Therefore, the impact of the development will be minimised, in accordance with policy 18 of the NCC Minerals and Waste Local Plan (2017).

Ecological Impact Assessment

- 7.13 Delta Simons have also produced an Ecological Impact Assessment (EIA) to support the planning application. The report concludes that there may be a short-term effect on the biodiversity value of the site in terms of the diversity of the flora and fauna it supports until the site is developed and proposed newly created habitats become established, in the long term it is anticipated that full mitigation and enhancement measures will be achieved and there will be no significant residual effects on designated sites, habitats or fauna resulting from the extraction works.
- 7.14 Therefore, it is considered that the development accords with Policies 18 and 20 of the NCC Minerals and Waste Local Plan (2017).

Code of Construction Practice

- 7.15 Urban & Civic have also instructed RPS Consulting to produce a Code of Construction Practice (CoCP) relating to the minerals extraction. The CoCP sets out relevant details of operational measures for the extraction of the minerals in so far as they relate to potential environmental effects. The commitments set out within the CoCP are mandatory upon all developers and contractors which work on the sites from which minerals are proposed to be extracted at the Priors Hall site.

Restoration Aftercare

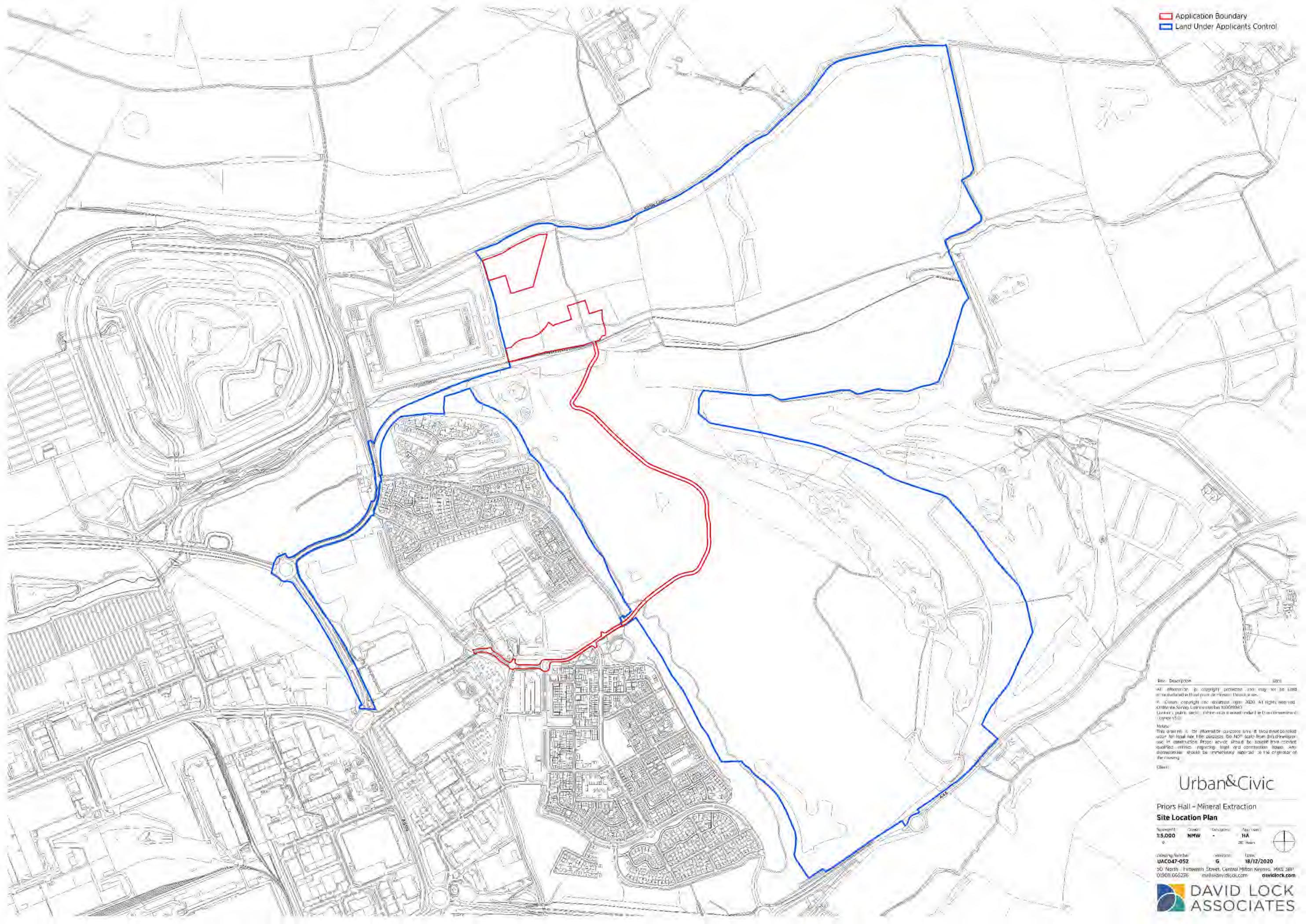
- 7.16 The Environmental Dimension Partnership (EDP) have prepared a Restoration Aftercare Statement, which is submitted in support of the application. The statement sets out short/medium term remediation measures to ensure that the extraction areas are restored satisfactorily. It should be noted that long term, the extraction areas are located in areas of proposed public open space within Zone 3 of Priors Hall. Therefore, the final state of the extraction areas will be confirmed through future reserved matters applications to East Northamptonshire Council. The satisfactory aftercare proposals ensure the development is in accordance with the relevant policies within the NCC Minerals and Waste Local Plan (2017) and the NPPF.

8.0 CONCLUSIONS

- 8.1 This Planning Statement has been prepared in support of the full planning application submitted by David Lock Associates on behalf of Urban & Civic for the proposed phased extraction of minerals for use as a construction material as part of Zones 2 and 3 at Priors Hall.
- 8.2 The proposed development will have significant environmental benefits, as outlined throughout the Statement. Any potential impacts of the development will be minimised and mitigated as outlined in the supporting documents. The proposed development will support Urban & Civic’s continued development of Priors Hall, enabling the development of thousands of homes and associated high quality infrastructure.
- 8.3 This Statement has demonstrated how the proposal is in substantial conformity with adopted planning policy. This and the material considerations that weigh in favour of the proposed development, demonstrate the acceptability of the proposed development in planning terms.
- 8.4 Therefore, based on the analysis undertaken and presented in this Statement, the proposed development is in compliance with existing policy and should be approved in accordance with the NPPF and Section 38(6) of the Planning and Compulsory Purchase Act 2004. The applicant therefore respectfully requests that this application be granted full planning permission without delay.

APPENDIX A SITE LOCATION PLAN

Application Boundary
Land Under Applicants Control



Rev. Description Date
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 Client:

Urban&Civic

Priors Hall – Mineral Extraction
 Site Location Plan

Scale: 1:5,000
 Grid: NMW
 Datum: HA
 0 200 Metres

Drawing Number: UACO47-052
 Revision: 6
 Date: 18/12/2020
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APPENDIX B SITE CONTEXT PLAN



- ▬ Application Boundary
- ▬ Land Under Applicants Control
- Development Framework Plan**
- Local Centre
- Primary School
- Formal Open Space
- ▬ Wildlife Corridor
- ▬ Flexible Land Use - Primary School Expansion or Informal Open Space
- ▬ Development Area
- ▬ Strategic Open Space
- ▬ Primary Site Access
- ▬ Pedestrian and/or Cycle Access
- ▬ Primary Street
- ▬ Public Rights Of Way
- ▬ Existing Public Right of Way (PRow)
- ▬ Existing PRow to be Diverted (MSI/HFID)
- ▬ PRow Diversion Alignment (MSI/HFID)
- ▬ Proposed PRow Creation
- ▬ Existing Waterbodies
- ▬ Roman Villa Development Exclusion Zone
- ▬ Local Wildlife Site
- ▬ Kirby Lane Heritage Buffer Development Exclusion Zone
- ▬ Proposed Local Wildlife Site
- ▬ 20m Local Wildlife Site Development Exclusion Zone

Rev. Description Date

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Client:

Urban&Civic

Priors Hall - Mineral Extraction
Site Context Plan

Scale: 1:5,000	Drawn: NMW	Design: HA	App: HA
0		20 Meters	

Drawing Number: UACO47-053
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