

PLANNING APPLICATION

RETROSPECTIVE PLANNING APPLICATION FOR THE CONSTRUCTION OF A BUILDING TO HOUSE WOOD SHREDDING OPERATIONS, CONSTRUCTION OF SIX ADDITIONAL WOOD STORAGE BAYS AND MINOR REALIGNMENT OF INTERNAL ACCESS TRACK

PEBBLE HALL, THEDDINGWORTH ROAD, THEDDINGWORTH,
NORTHAMPTONSHIRE, LE17 6NJ

WELLAND WASTE MANAGEMENT LTD

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CONTENTS

1	INTRODUCTION	3
1.1	Introduction	3
1.2	The Site and its Surroundings	3
1.3	Planning History at Pebble Hall.....	4
2	THE PROPOSED DEVELOPMENT	7
2.1	Overview	7
2.2	The Building	7
3	PLANNING POLICY CONTEXT	10
3.1	Introduction	10
3.2	The Development Plan	10
3.3	Other Relevant Documents.....	13
4	ASSESSMENT OF THE PROPOSAL	15
4.1	Introduction	15
4.2	The Development within the Site Complex	15
4.3	Design of the Facility	16
4.4	Environmental and Local Amenity Considerations.....	16
5	CONCLUSIONS.....	22
Appendix 1	Landscape and Visual Impact Assessment	
Appendix 2	Noise Assessment	
Appendix 3	Flood Risk Assessment	

1 INTRODUCTION

1.1 Introduction

- 1.1.1 This Planning Statement accompanies a planning application seeking retrospective planning permission for the construction of a building to house wood shredding operations, six additional wood storage bays to store wood and minor realignment of an internal access track. The shredded wood will be used as fuel for the permitted Renewable Energy Generation Facility (REGF) at Pebble Hall, Theddingworth (ref: 13/00098/WASFUL). The application is submitted to Northamptonshire County Council by GP Planning Ltd on behalf of Welland Waste Management (The Applicant).
- 1.1.2 The construction of this building and additional storage bays are part of site wide changes being made by the Applicant following updated requirements of the Environment Agency's Fire Prevention Guidance, the latest version of which was published on 29th July 2017.
- 1.1.3 An application is currently being considered by Northamptonshire County Council for the construction of a temporary wood storage yard on land to south of the site (ref: 16/00022/WASFUL). An application is also being considered by Leicestershire County Council for ongoing use of the access (ref: 2016/VOCM/0189/LCC).
- 1.1.4 The proposed development, subject of this planning application, is linked to the permitted REGF. Given that the REGF fell under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, and had the potential to give rise to significant effects, it was accompanied by an Environmental Statement.
- 1.1.5 The wood associated with this proposal will be used as a fuel for the REGF. However, the proposed development is less than 0.5 hectares in area and is not likely to give rise to significant effects. For that reason, in accordance with the EIA Regulations, these proposals are not classed as EIA development.
- 1.1.6 The planning application is supported by the following drawings:
- GPP/WWM/PHSS/17/01 Revision 1 – Site Location Plan
 - GPP/WWM/PHSS/17/02 Revision 1 – Site Plan
 - GPP/WWM/PHSS/17/03 Revision 1 – Site Layout
 - GPP/WWM/PHSS/17/04 Revision 1 – Elevations for Shredding Shed
 - GPP/WWM/PHSS/17/05 Revision 1 – Site Layout Plan – Whole Site
 - GPP/WWM/PHSS/16/06 Revision 3 - Proposed Storage Bays Indicative Layout
- 1.1.7 Northamptonshire County Council's Validation Checklist is included in Appendix 1. Compliance, as appropriate, is identified in the list.

1.2 The Site and its Surroundings

- 1.2.1 The Pebble Hall complex is located south of the A4304 (Bosworth Road), Theddingworth, in the northern part of the District of Daventry as shown on Drawing GPP/WWM/PHSS/17/01 Revision
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1 – Site Location Plan.

- 1.2.2 It is approximately 1.8 km east of the village of Husbands Bosworth and 750 metres south-west of Theddingworth.
- 1.2.3 There is an existing access to the Application Site, which crosses the Northamptonshire and Leicestershire county boundaries. It is surfaced in concrete and is approximately 560 metres long from its junction with the A4304. The site has excellent access onto the strategic highway network via the A4304, A5199 and M1. There are no additional vehicular movements proposed as a result of this application.
- 1.2.4 Pebble Hall is an agriculturally based operation that has been the subject of farm diversification, mainly as a result of the BSE crisis. By a series of grants of planning permission over a number of years, the site has established a variety of industrial/commercial/ renewable energy concerns and a waste management operation as part of the diversification of the farm. The site already undertakes wood waste management operations and shredding, in compliance with planning permission for a previous REGF (08/00053/WAS). The waste wood is sourced from commercial operators and Household Waste Recycling Sites, within a catchment area of approximately 30 mile radius, as required by Condition 14 of the existing planning permission 08/00053/WAS.
- 1.2.5 The Application area for the new building is approximately 700m² in area and is shown edged red on Drawings GPP/WWM/PHSS/17/02 Revision 1 – Site Plan and GPP/WWM/PHSS/17/03 Revision 1 – Site Layout. The application area for the six storage bays is approximately 3,900 m² in area. The red line boundary for this allows for construction and also includes the realignment of approximately 40m length of internal access track to accommodate the storage bays.
- 1.2.6 The building is located in a part of the site that has planning permission for storage and shredding of wood waste and sits adjacent to the existing composting yard. The storage bays will be built on part of the site that is currently being used as a construction compound/car park by the REGF contractors.
- 1.2.7 Both parts of the application are on brownfield land.
- 1.2.8 There are no sensitive receptors within 500 metres of the Application Site. The nearest sensitive receptor is Woodside Bungalow, located over 600 metres from the Application Site on the other side of the A4304. Land around the Pebble Hall complex has been extensively landscaped in recent years. Additional landscaping is proposed as part of the application for the wood storage yard.
- 1.2.9 There are no international or European designated nature conservations sites within 2km of the Application Site. There is one SSSI approximately 2km of the Application Site. There is a Scheduled Ancient Monument (SAM) in Theddingworth. The nearest public footpath is east of the site, through the Hothorpe Hills, which is approximately 1.3km away.

1.3 Planning History at Pebble Hall

- 1.3.1 The planning history at Pebble Hall is complex. Only those activities relevant to this planning application are included here, for information.
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- 1.3.2 In December 2000 Daventry District Council granted planning permission for a change of use of the farm buildings to B8 distribution uses; (ref: DA/00/1095). This permission has been implemented.
- 1.3.3 On 21 October 2003 (ref: DA/03/725C) planning permission was granted by Northamptonshire County Council for green waste composting. This permission has been implemented. A second permission was granted on 4 October 2005, for an extension to the area to be used for green waste composting, it has also been implemented (ref: DA/05/773C). These permissions allow a total throughput of 25,000 tonnes per annum of green waste.
- 1.3.4 Planning permission DA/07/319 was granted in June 2007 for the construction of an In-Vessel Composting Facility to deal with mixed green and food waste up to 25,000 tonnes per annum. However, as the Waste Collection Authority has subsequently abandoned plans to collect the food waste there is no need to provide an In-Vessel Composting Facility. This permission was not implemented.
- 1.3.5 Planning permission 08/00053/WAS was granted in June 2008 for a Renewable Energy Generation Facility (REGF) on the site previously consented for In-Vessel composting as detailed above. The Development Plan that the proposal was assessed against comprised the East Midlands Regional Waste Strategy, January 2006 and Northamptonshire Waste Local Plan March 2006. The permission was implemented when the hoggin was excavated to create the platform for the proposed REGF and subsequently the wood waste imports and processing commenced. However, the building was not constructed.
- 1.3.6 Planning permission 09/01593/FUL was granted on 14th June 2010 for the widening of the access track.
- 1.3.7 Planning permission 2010/C262/03 was granted by Daventry District Council on 7th July 2010 for the retention of temporary office buildings in association with the permitted carpet recycling activities at Pebble Hall.
- 1.3.8 Planning permission 2010/0477 was granted by Daventry District Council on 19th October 2010 for the retention of engineering works associated with the existing distribution uses and waste related activities at Pebble Hall.
- 1.3.9 Planning permission 10/00038/WAS was granted on 28 July 2010 for the use of one B8 unit for carpet recycling and part of the yard for carpet storage. The carpet recycling operations have now ceased.
- 1.3.10 A planning application was granted by Northamptonshire County Council in October 2014 (ref: 13/00117/WASFUL) for a Thermophilic Aerobic Digester (TAD) and its associated renewable energy generation in an adjacent building previously used as a grain store on site.
- 1.3.11 A planning application was submitted to Leicestershire County Council to carry forward the limitations imposed on a S106 Agreement restricting vehicle movements onto the highway as follows: not to exceed 240 vehicle movements per day Monday to Friday, 120 on Saturdays and 65 on Sundays.; reference 2013/0282/03. This was subsequently approved.
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- 1.3.1 Planning permission 13/00098/WASFUL was granted on 17th October 2014 for modifications to a Renewable Energy Generation Facility (REGF) at Pebble Hall. The modifications include the re-siting of the power generation building, an increase in its footprint and height to accommodate gasification plant, an increase in the stack height and an increase in wood waste inputs to provide the fuel supply.
- 1.3.2 A separate planning application was submitted to Leicestershire County Council to link the S106 Agreement to permission for the revised REGF. This was subsequently approved.
- 1.3.3 A planning application is currently being considered by Northamptonshire County Council (ref: 16/00022/WASFUL) following the aforementioned change in the EA's Fire Regulations. It proposes the construction of a wood yard and associated infrastructure to the south-west of the site. A planning application is currently being considered by Leicestershire County Council for continued use of the access in line with this proposal.

2 THE PROPOSED DEVELOPMENT

2.1 Overview

- 2.1.1 This planning application seeks retrospective planning permission for the erection of a building to house a wood shredder. The machinery will be operating in a similar location that it has in the past, on land which has planning permission for these operations, simply with the addition of the building around it. In addition, the application seeks planning permission for six additional wood storage bays on land adjacent to the TAD/REGF buildings and a minor realignment of an internal track.
- 2.1.2 Under the new waste storage and processing operations, waste wood will be imported to the site and taken to the wood storage yard and additional storage bays, comprising part of this application or directly to the shredding shed and adjacent bays.
- 2.1.3 Pre-shredded waste and wood required to meet any shortfall in requirements for that day will be taken directly to the shredding shed area. Non-shredded wood will be placed directly in the storage bays. It will then be removed from the bays, as required, and shredded into a walking floor vehicle. The preliminary shredded wood waste will then be transported in the walking floor vehicle to the shredding shed for further shredding and storage. The end product will then be used as a fuel for combustion in the REGF which subsequently exports electricity to the national grid.
- 2.1.4 The erection of this building is, in part, a response to some complaints by local residents of dust emissions from the site affecting off site receptors. By carrying out shredding operations inside a building, dust emissions will be mitigated and less likely to impact upon the local area.
- 2.1.5 The requirement for the additional wood storage bays arises out of the need to reduce the scale of the main wood storage area (subject of a separate planning application).

2.2 The Building

Use

- 2.2.1 The building will be used to house a new 'state of the art', high speed wood shredder for the processing of waste wood that is then subsequently transferred to the REGF.
- 2.2.2 With the exception of pre-shredded imports, waste wood is imported from locations within the catchment area of the site and preliminarily shredded through a slow speed shredder to not less than 150mm. This makes the wood safer to store. The wood is then transported to the main wood shredder to be housed in the proposed building. Here the wood waste will be shredded to the 70mm required for combustion. The shredded wood will be taken directly to the REGF or it will be briefly stored before being subsequently transferred to the REGF.

Siting

- 2.2.3 The building will be located in the east of the Pebble Hall complex, in a portion of land which is permitted to be and has been subsequently used for existing waste wood shredding operations.
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This is illustrated on GPP/WWM/PHSS/17/03 Revision 1 – Site Layout.

- 2.2.4 The building will be positioned with its long side parallel to the boundary of the complex and in close proximity to the REGF.

Scale and Size

- 2.2.5 The building has a footprint of 35m by 20m. It has a pitched roof which measures 10m in height to the eaves and 12m to the ridge.
- 2.2.6 It is located 6m from the base of the bund to the east and 42m away from the north-east boundary.
- 2.2.7 The TAD building has a 17m high stack with the building sitting at 9m at its highest point. The dominant building on site is the REGF building. The fuel hall is 10.5m in height, the plant hall is 18.5m high and the stack is 30m high.
- 2.2.8 The shredding shed is located to the rear of the site behind an existing shed used as part of the existing composting and recycling operations. When viewed in the context of the site, this building is appropriate in scale and fits with its surrounding.

Material and Appearance

- 2.2.9 The building is metal clad and coloured Juniper Green in line with the REGF and TAD buildings and is designed as such to ensure it does not give rise to visual impact when viewed from off site. Drawing /WWM/PHSS/17/04 Revision 1 – Elevations for Shredding Shed shows the elevations of the shredding shed as follows:
- North west elevation: On the side of the building nearest to the existing compost yard, there are four bays open for access to wood ready for REGF and two personnel doors.
 - South east elevation: The side near the water tank, there are 2 roller shutter doors at 6m wide by 5 m high and a personnel door.
 - North east elevation: The gable end near Hothorpe does not have any access points.
 - South west elevation: The gable end near the REGF will have a roller shutter door in the centre at 7m wide and 5m high.

Storage bays

- 2.2.10 Six additional storage bays are proposed. These will be concrete structures, the same as those proposed in the main wood yard. The bays will be 16m x 16m in area and the bay walls will be 5m in height, allowing the storage of 4m high waste wood piles in each bay. Elevations are shown on Drawing GPP/WWM/PHSS/17/06 Revision 1.

Landscaping

- 2.2.11 No additional landscaping is proposed as part of the proposed development as extensive landscaping has taken place on site as part of other approved waste management developments. A consolidated landscaping scheme will be submitted once the wood storage
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yard application is determined. The wood shredding building site is effectively screened by an established bund and other structures on site and the natural contours of the land. The storage bays will be screened by implemented native woodland planting to the north-west.

3 PLANNING POLICY CONTEXT

3.1 Introduction

- 3.1.1 This section provides an indication of the main Development Plan policies and national planning guidance that has been considered and assessed in the preparation of the planning application and supporting Environmental Statement.
- 3.1.2 The Development Plan in this instance consists of:
- Northamptonshire Minerals and Waste Local Plan (October 2014)
 - Daventry District Council Local Plan 1997 (Saved Policies)
 - West Northamptonshire Joint Core Strategy (December 2014)
- 3.1.3 The main objectives and planning policies that are relevant to the proposal are set out below. The policies are not all included in full; only the relevant parts of the policies are included. The parts that are relevant to this development are highlighted by underlining.

3.2 The Development Plan

Northamptonshire Minerals and Waste Local Plan (October 2014)

- 3.2.1 The relevant policies are considered to be:
- Policy 11 Northamptonshire's Waste Management Capacity
 - Policy 12 Spatial Strategy for Waste Management
 - Policy 13 Development Criteria for Waste Management Facilities
 - Policy 22 Addressing the Impact of Proposed Minerals and Waste Development
 - Policy 25 Landscape Character
 - Policy 27 Layout and Design
- 3.2.2 Policy 11 states that '*The development of a sustainable waste management network to support growth and net self-sufficiency within Northamptonshire will involve the provision of facilities to meet the following indicative waste management capacity requirements during the plan period:*'

Hierarchy level	Management method	Indicative capacity requirement (million tonnes per annum)	
		2021	2031
Preparing for re-use and recycling	Recycling (non-inert)	0.26	0.28
	Composting and anaerobic digestion	0.17	0.19
	Inert recycling	0.74	0.74
	Hazardous recycling	0.02	0.02
Other recovery	Advanced treatment	0.86	0.92
	Hazardous treatment	0.01	0.01
	Inert fill or recovery	0.16	0.16

This provision will come from a mix of extensions to existing sites, intensification or re-development of existing sites and new sites, providing they all meet the spatial strategy for waste management and are assessed as meeting environmental, amenity and other

requirements. Allocations that will contribute to meeting provision will be identified in the Locations for Waste Development DPD.

- 3.2.3 Policy 12 sets out NCC's spatial strategy for waste management. It states that:
Northamptonshire's waste management network, particularly advanced treatment facilities with a sub-regional or wider catchment, will be focused within the central spine and the sub-regional centre of Daventry. Development should be concentrated in Northampton, Wellingborough, Kettering, Corby and Daventry. Development in the smaller towns should be consistent with their local service role.

Facilities in urban areas should be co-located together and with complementary activities.

At the rural service centres, facilities with a local or neighbourhood catchment will provide for preliminary treatment in order to deal with waste generated from these areas.

In the rural hinterlands only facilities with a local or neighbourhood catchment providing for preliminary treatment, or that are incompatible with urban development, should be provided. Where it is the latter they should deal with waste generated from identified urban areas and be appropriately located to serve those areas.

Facilities in rural areas should, where possible, be associated with existing rural employment uses.

- 3.2.4 Policy 13 provides development criteria for waste management facilities which are not allocated:

Proposals for waste management facilities on non-allocated sites (including extensions to existing sites and extension to allocated sites) must demonstrate that the development:

- *Does not conflict with the spatial strategy for waste management;*
- *Promotes the development of a sustainable waste network and facilitates delivery of Northamptonshire's waste management capacity requirements;*
- *Clearly establishes a need for the facility identifying the intended functional role, intended catchment area for the waste to be managed, market base for any outputs, and where applicable the requirement for a specialist facility;*
- *Is in general conformity with the principles of sustainability (particularly regarding the intended catchment area);*
- *Facilitates the efficient collection and recovery of waste materials; and*
- *Where intended for use by the local community, is readily and safely accessible to those it is intended to serve.*

- 3.2.5 Policy 22 relates to the impact of proposed minerals and waste development:

Proposals for minerals and waste development must demonstrate that the following matters have been considered and addressed:

- *Protecting Northamptonshire's natural resources and key environmental designations (including heritage assets);*
- *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, birdstrike, 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.*

3.2.6 Policy 25 addresses Landscape Character. It states that:

Minerals and waste 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 during the development, operational life, restoration, aftercare and after-use. Opportunities for enhancement should be maximised through restoration, aftercare and after-use.

Proposals for minerals and waste development will be required to undertake a landscape impact assessment (where appropriate) based on the landscape character assessment in order to identify:

- *the presence of landscape values (including their nature, extent and level of importance) and determine any potential impacts,*
- *any necessary measures to mitigate potentially adverse impacts, and*
- *opportunities to protect and enhance particular features that create a specific aspect of local distinctiveness or character.*

3.2.7 Policy 27 provides guidance on layout and design quality:

The layout and overall appearance of waste management facilities, and where appropriate minerals development, will be required to demonstrate that the development:

- *Supports local identity and relates well to neighbouring sites and buildings;*
- *Is set in the context of the area in which it is to be sited in a manner that enhances the overall townscape, landscape or streetscape (as appropriate);*
- *Utilises local building materials as appropriate;*
- *Incorporates specific elements of visual interest; and*
- *Builds-in safety and security.*

Daventry District Council Local Plan 1997 (Saved Policies)

3.2.8 The relevant policies are:

- Saved Policy GN2 General
- Saved Policy EN1 Special Landscape Area

3.2.9 Policy GN2 sets out the general criteria for granting planning permission and states that development will normally be granted provided the proposal is of a type and scale in-keeping with the locality and does not detract from its amenities. There are a number of other criteria, including impact on access and the Special Landscape Area.

3.2.10 Policy EN1 relates to Special Landscape Areas (SLA) and seeks to restrict development in the SLAs to agricultural, forestry, recreation and tourism development.

West Northamptonshire Joint Core Strategy (December 2014)

3.2.11 The relevant policies are:

- Policy S10 Sustainable Development Principles
- Policy BN7 Flood Risk
- Policy BN9 Pollution Control
- Policy R2 Rural Economy

3.2.12 Policy S10 seeks to ensure that development incorporates sustainable development principles and, amongst other things, achieves the highest standard of design, minimises pollution and protects the environment.

3.2.13 Policies BN7 and BN9 relate to flood risk and pollution control ensuring that developments comply with flood risk assessment and management requirements and minimise pollution.

3.2.14 Policy R2 is concerned with the rural economy and states that proposals which sustain and enhance the rural economy by creating and safeguarding jobs and businesses will be supported where they are of an appropriate scale for their location and protect best and most versatile agricultural land.

3.2.15 Policy S11 is concerned with Low Carbon and Renewable Energy.

3.3 Other Relevant Documents

National Planning Policy for Waste (October 2014)

3.3.1 Paragraph 1 of the NPPW states that '*Positive planning plays a pivotal role in delivering this country's waste ambitions through:*

Delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy...

3.3.2 Paragraph 5 provides guidance on suitable sites and areas:

Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against each of the following criteria:

- *The extent to which the site or area will support the other policies set out in this document;*
- *Physical and environmental constraints on development, including existing and proposed neighbouring land uses, and having regard to the factors in Appendix B to the appropriate level of detail needed to prepare the Local Plan;*

3.3.3 Paragraph 7 is concerned with determining planning applications. It provides that:

When determining waste planning applications, waste planning authorities should:

- *Consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B and the locational implications of any advice on health from the relevant health bodies.*
 - *Waste planning authorities should avoid carrying out their own detailed assessment of epidemiological and other health studies.*
 - *Ensure that waste management facilities in themselves are well-designed, so that they*
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contribute positively to the character and quality of the area in which they are located.

National Planning Practice Guidance (2014)

- 3.3.4 Planning Practice Guidance provides advice on determining waste related planning applications. In particular it advises on when unallocated sites can be used and recognises that there may be changes that give rise to opportunities not envisaged in the Local Plan. In the case of waste facilities, the onus is on applicants to demonstrate that the facility will not undermine the waste planning strategy through prejudicing the movement of waste up the hierarchy.

National Planning Policy Framework, March 2012

- 3.3.5 The National Planning Policy Framework was published on the 27th March 2012 and came into force immediately with respect to plan and decision making. The NPPF states at paragraph 5 of its introduction that it does not contain specific waste policies *'since national waste planning policy will be published alongside the National Waste Management Plan for England'*. However, paragraph 5 goes on to say that local authorities should have regard to the policies in the National Planning Policy Framework in preparing their waste plans.
- 3.3.6 The NPPF provides a presumption given in favour of development with sustainable credentials. Paragraph 14 of the NPPF states:
- At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. For decision-taking this means*
- *Approving development proposals that accord with the development plan without delay and*
 - *Where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless:*
 - *Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or*
 - *Specific policies in this Framework indicate development should be restricted.*

4 ASSESSMENT OF THE PROPOSAL

4.1 Introduction

- 4.1.1 From a review of the relevant planning policies, the main areas of consideration in determining the acceptability of the shredding shed, the additional storage bays and realigned track are:
- The scale and type of development within the site complex
 - Environmental and Local Amenity Considerations
 - Design of the Facility

4.2 The Development within the Site Complex

- 4.2.1 Policies 11 and 12 of the Northamptonshire Minerals and Waste Local Plan (2014) relate to the waste management capacity in the County and the overall spatial strategy.
- 4.2.2 Policy 11 states that Northamptonshire's waste management capacity will come from *"a mix of extensions to existing sites, intensification or redevelopment of existing and new sites, providing they meet the spatial strategy for waste management and are assessed as meeting environmental, amenity and other requirements."*
- 4.2.3 In policy terms, this proposal constitutes *"intensification or redevelopment of existing (... sites"*.
- 4.2.4 Policy 12 relates to the spatial strategy for waste management. Pebble Hall Farm is located in the rural hinterlands and only facilities with a local or neighbourhood catchment providing for preliminary treatment, or that are incompatible with urban development, should be provided.
- 4.2.5 The wood storage and shredding operations will take place at an existing waste management facility and on brownfield land within its curtilage. The building and storage bays represent an intensification of the built development on the site but not an intensification of wood waste arriving at the site, which is already permitted.
- 4.2.6 The storage of wood waste needs to take place in accordance with the EA's latest Fire Prevention Guidance which provides for safe storage of wood. The waste storage element of the proposed development is effectively preliminary treatment and the storage of wood waste is also deemed incompatible with urban development given the risk of fire.
- 4.2.7 Policy 13 sets out the development criteria for waste management facilities (non-inert and hazardous) which are not allocated in the Plan. Pebble Hall Farm is a committed site but is not allocated for specific future development.
- 4.2.8 Five of the six points at the beginning of the Policy are relevant. In summary they are: *(i) the development does not conflict with the spatial strategy for waste management; (ii) Promotes the development of a sustainable waste network and facilitates delivery of Northamptonshire's waste management capacity requirements; (iii) Clearly establishes a need for the facility (iv) is in general conformity with the principles of sustainability (particularly regarding the intended catchment area); (v) facilitates the efficient collection and recovery of waste materials.*

- 4.2.9 The land in question is brownfield land, currently used for waste management operations and has previously been considered by the County Council to comply with the Waste Spatial Strategy and other elements of the Plan.
- 4.2.10 These proposals relate to housing part of these permitted operations in a purpose-built building. Proposals for extensions or changes on committed sites (or other sites subsequently granted planning permission) must comply with policies in the Plan, and it is accepted that being committed confers a favourable status on these sites for a continuation of a waste use where this meets the intent of the Strategy and policies and is in accordance with National Planning Policy.
- 4.2.11 Waste management facilities should exist in locations where investment can be optimised and sustainable development can occur. The grant of planning permission for the REGF has generated significant investment in the facility and guarantees the long term future of the site and related employment. The grant of this planning permission will ensure that wood waste imported to the site is stored in appropriate quantities to feed the REGF, it is stored safely and the provision of a building will assist in minimising the environmental impact.
- 4.2.12 As a priority, waste development must support the Strategy (which it does) and promote a sustainable waste management network (which it does by co-locating the existing operations adjacent to the REGF). The supporting text supports this by stating that all proposals should aim to integrate and co-locate facilities together and with complementary facilities. This development is a clear example of how co-location should work.
- 4.2.13 The building and wood storage area are in conformity with Policies 11, 12 and 13.

4.3 Design of the Facility

- 4.3.1 Policy 27 relates to layout and design quality. Paragraph 6.31 of the supporting text relates to the positive impacts of strategic site layout. The location of the proposed building on site exemplifies strategic site layout given its proximity to the REGF where the fuel will be used. This contributes to the efficiency of the site. Similarly, the additional wood storage bays are proposed to be located on brownfield land in proximity to the existing, proposed wood storage bays.
- 4.3.2 With regard to its immediate surroundings, the proposed building will be viewed in the context of the existing operations on site, which include several structures each with a role to play in the provision of waste management at Pebble Hall. Its footprint and height are a direct effect of the machinery it is proposed to contain, and therefore are key to its functionality. The building is clad in Juniper Green to reduce the significance of its visual impact, contributing to what paragraph 6.32 describes as *"integration into the surrounding landscape"*.

4.4 Environmental and Local Amenity Considerations

Introduction

- 4.4.1 This section considers the environmental impacts associated with the proposed construction of
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a building to house existing shredding operations. The following are the main environmental topics considered relevant to the building, wood storage bays and realigned track:

- Landscape and Visual Impact
- Air Quality (including Dust)
- Noise
- Flood Risk and Drainage

Landscape and Visual Impact

- 4.4.2 Policy 22 of Northamptonshire County Council's Minerals and Waste Local Plan (2014) relates to the impact of proposed minerals and waste development. Proposals for such development must demonstrate, *inter alia*, that built development is of a design and layout that has regard to its visual appearance in the context of the defining characteristics of the area.
- 4.4.3 A Landscape and Visual Impact Assessment (LVIA) has been carried out and accompanies this planning application as Appendix 1.
- 4.4.4 Pebble Hall is an established waste and renewable energy complex, which benefits from several planning permissions for industrial/waste uses. The planning application seeks to gain planning permission for a building to house shredding machinery that will prepare fuel for the existing REGF. The additional storage bays will provide additional storage capacity for waste wood, ensuring that there is a constant and consistent supply of fuel to the REGF.
- 4.4.5 The LVIA has assessed the impact of the building, wood storage bays and realigned track and concludes that the combined development should not cause unacceptable landscape and visual impacts especially in the wider landscape. Appropriate measures will be taken to integrate the development into the surrounding landscape and to mitigate short distance views where possible thanks to earlier phases of development.
- 4.4.6 The most notable impact will be shredding building.
- 4.4.7 The impact on heritage assets will be minimal as it is only isolated listed buildings that will realistically see towards the site and proposed changes.
- 4.4.8 Several opportunities arise to reduce the visual impact of the proposed development and improve and conserve the character of the area. The location of the proposed building is currently set so that it is centrally located to the space allowed. This enables the development from a visual perspective to be as far as possible from any one of its boundaries. This ensures that the building does not give the impression that it is over bearing or 'towering' above people on any one side.
- 4.4.9 The colour of the building is an important factor and the use of Juniper Green cladding will assist in blending the development into its surroundings.
- 4.4.10 Landscape planting undertaken as part of previous proposals have been implemented and will be further enhanced as a result of proposals associated with wood storage yard application that is currently being considered by Northamptonshire County Council.
- 4.4.11 Overall, for the reasons outlined above relating to the land of landscape impact and extent of

biodiversity provision , the proposed development is considered to be compliant with Policy 22 of Northamptonshire County Council's Local Plan (2014) and Saved Policy EN1 of Daventry District's Local Plan.

Air Quality (including Dust and Human Health)

- 4.4.12 There are no emissions to air from the shredding operations in question. The only relevant air quality consideration is dust. The shredder will be enclosed in a building, which will have a positive effect on mitigating and dust impacts. This will assist in addressing concerns previously raised by local residents relating to fugitive emissions off site.
- 4.4.13 The waste wood storage bays will store unprocessed wood which will be of a size not likely to generate dust.
- 4.4.14 Current practice associated with the consented activity of processing recycled wood involves a fine shredding process, in equipment that although not fully enclosed, is equipped with appropriate dust abatement capabilities. This finely shredded wood material is then stored externally prior to being transferred for onward transport off site. Although trucks are sheeted prior to leaving the site, fine dust is generated.
- 4.4.15 The finely shredded wood is around 20mm. The proposed storage and shredding operations will see an initial preliminary shred of around 150mm with the finer, high speed shred no smaller than 70mm.
- 4.4.16 The particle sizes of the material involved will therefore be significantly larger than currently produced, which will significantly reduce dust.
- 4.4.17 A Dust Management Plan will be prepared in the event that planning permission is secured for the larger wood storage area. These measures, which will include shrouding the external shredder and the use of bowsers to suppress dust, will be applied to the shredding and storage activities.
- 4.4.18 The development is therefore compliant with relevant criteria in Policy 22 of Northamptonshire's Minerals and Waste Local Plan and Policy BN9 of the Joint Core Strategy.

Noise Emissions

- 4.4.19 The planning application is supported by a Noise Assessment at Appendix 2. There are noise conditions attached to the planning permission for the REGF (ref. 13/00098/WASFUL) that limit levels of noise from the site.
- 4.4.20 Noise levels associated with the operation of the shredder and associated plant have been calculated at the properties identified previously. The results of the calculations from the operation of the shredding shed have been combined with the noise levels calculated previously for the REGF and TAD sites and the external shredding operation within the south-western area of the site to evaluate the cumulative noise levels from the site.
- 4.4.21 Given that the character of the noise associated with the proposed shredding operation would be equivalent to existing operations on site, no penalties have been applied when assessing the

noise levels from the proposed operations, as the noise generated would be continuous and principally attributable to the operation of a diesel engine.

4.4.22 The levels calculated for daytime are set out below along with an assessment of calculated noise levels.

Receptor	Calculated Daytime $L_{Aeq, 1 \text{ hour}}$ [dB]			
	REGF + TAD	External Shredding	New Shredding Building	Cumulative
Hothorpe Hall	29	36	33	38
Hothorpe Hall Eco Lodges	33	36	35	40
Woodside Farm	34	42	41	45
Bosworth Hall	27	37	30	39
Pebble Hall Farm	50	41	42	51

Table 1.1 Calculated Cumulative Daytime Noise Levels

Receptor	Calculated Daytime $L_{Aeq, 1 \text{ hour}}$ [dB]		
	Cumulative Noise Level [dB $L_{Aeq, 1 \text{ hour}}$]	Worst Case Noise Limit [dB $L_{Aeq, 1 \text{ hour}}$]	Difference [dB]
Hothorpe Hall	38	42	-4
Hothorpe Hall Eco Lodges	40	42	-2
Woodside Farm	45	52	-7
Bosworth Hall	39	45	-6
Pebble Hall Farm	51	52	-1

Table 1.2 Assessment of Calculated Noise Levels

4.4.23 Table 1.2 indicates that the proposed shredding operation would give rise to an increase in the overall noise levels from the site. However, the calculations indicate that the overall noise levels would remain below the noise limits derived from the requirements of Condition 20 of the planning permission for the REGF and would thus remain acceptable to ensure any potential adverse effects upon the occupants of the surrounding properties were minimised.

4.4.24 On this basis, the intermittent operation of the plant within the new shredding shed would not result on any adverse noise effects. Therefore, the development complies with Policy 22 of Northamptonshire's Minerals and Waste Local Plan.

Flood Risk and Drainage

4.4.25 A Flood Risk Assessment has been carried out and is appended to this application as Appendix

3.

- 4.4.26 Policy 22 of Northamptonshire County Council's Local Plan (2014) is concerned with protecting local amenity. The Application Site is located in Flood Risk Zone 1 and therefore has a less than 1 in 1000 chance of flooding. The site is not designated as a groundwater protection zone and River Welland passes the Application Site to the North.
- 4.4.27 Potential sources of flooding are identified as:
- Fluvial flooding from watercourses;
 - Groundwater;
 - Surface water run-off from the development, and
 - Surface water from adjacent areas.
- 4.4.28 The extent of flooding from watercourses is isolated to a narrow corridor along the River Welland and does not affect the proposed development. Elevated groundwater levels are not encountered on the site because of the gradient and elevation.
- 4.4.29 The area occupied by the larger wood storage area, the additional proposed bays and access road historically drained to the River Welland with a green-field run-off rate. These developments will give rise to an increase in impermeable area draining to the river. That area of the site, including, the additional storage bays subject of this planning application, will need to be drained and the surface water managed to avoid flood risk.
- 4.4.30 The shredding shed is located on the wood storage slab which drains to a total retention pond designed to accommodate contaminated run-off. As there will be no increase in impermeable area, there will be no increased run-off. The design of the retention pond accords with the latest requirements for size including an allowance for climate change.
- 4.4.31 The risk of flooding from surface water run-off from land upstream is minimal because of the development's location.
- 4.4.32 The FRA includes an indicative drainage scheme at Appendix A.
- 4.4.33 The main proposed wood storage area and the additional bays are to be surfaced with concrete and run-off from the area will need to be contained. For the majority of rainfall events, the wood waste will absorb water which will then evaporate or be transferred into the REGF with the wood. However, during major rainfall events, run-off will be drained via a class 1 bypass interceptor into the new total retention pond which will be constructed under planning application 16/00022/WASFUL in the event that application is approved.
- 4.4.34 The storage is to be divided into two ponds located either side of an existing ditch, the volume of the pond has been calculated as 1899m³ for a 100-year return plus a 20% allowance for climate change. With the addition of the six proposed bays and the minor realignment of the access track, the volume of the pond increases to 2090m³.
- 4.4.35 Run-off collected in the total retention pond will normally be recycled in the REGF. However, when significant quantities accumulate, it will be tested for contamination before being tinkered of site (if it is contaminated) or released into the River Welland at a limited discharge rate of

7.4.l/s which is the equivalent of the green-field run-off rate.

4.4.36 The proposed surface drainage system will ensure that the site and adjacent developments will be protected from surface water run-off generated by the developments.

4.4.37 For the reasons set out above, the proposed development complies with Policy 22 in the Northamptonshire Minerals and Waste Local Plan and Policy BN7 of the Joint Core Strategy.

Other Environmental Matters

4.4.38 The proposed erection of a building to house wood shredding operations and the extra wood storage bays will not impact on transport movements associated with the operations on site.

4.4.39 There are no impacts on ecology or biodiversity or archaeology given the brownfield location

Conclusion

4.4.40 Having considered the main environmental topics relevant to this proposal, it is clear that the proposed erection of a building to house existing wood shredding operations, the creation of an additional six wood storage bays and minor realignment of the access track will not have adverse effects on the environment or local amenities. Further to this, the building would in fact mitigate some potentially adverse effects that currently exist, notably the dust emissions which have been the subject of concerns raised by local residents.

5 CONCLUSIONS

- 5.1.1 This Planning Statement has assessed the wood shredding building, six additional bays and minor realignment of the access track at Pebble Hall against the Development Plan.
- 5.1.2 The building is designed to house a high speed 'state of the art' wood shredding operation. Containing this activity has the effect of minimising the escape of fugitive dust emissions and therefore mitigating the potentially adverse effects of the local area including those beyond the site boundary.
- 5.1.3 The wood shredding building, proposed storage bays and track are located on brownfield sites within an existing waste management site.
- 5.1.4 The building relates to the existing operations of a committed waste management operation, which Policy 12 of the Northamptonshire Minerals and Waste Local Plan (2014) promotes. Policy 11 of the Northamptonshire Minerals and Waste Local Plan (2014) states that the provision of waste management will come from "a mix of extensions to existing sites, intensification or redevelopment of existing and new sites, providing they meet the spatial strategy for waste management and are assessed as meeting environmental, amenity and other requirements". This proposal would fall within this description, and due to the nature of the operations it supports is unsuitable for location within an urban area.
- 5.1.5 The environmental impacts of the proposed development have been considered in this Planning Statement. The development will cause no significant impacts and therefore it is an acceptable form of development in this location, and there would be a positive impact on the environment by reducing dust and noise emissions.
- 5.1.6 Overall, it is considered that the proposed development is in accordance with the Development Plan and accordingly planning permission should be granted for the building, retrospectively and for the storage bays and minor realignment of the access track.

Appendix 1 – Landscape and Visual Impact Assessment

Appendix 2 Noise Assessment

Appendix 3 Flood Risk Assessment

APPENDIX 1: Validation Checklist

Planning Statement	Included
Air Quality Assessment	Included
Archaeology	Not required
Daylight/Sunlight Assessment	Not Required
Design Statement	Not Required
Dust, mud and debris on the highway and Litter	Not Required
Environmental Impact Statement	Not Required
Ecology / Protected Species / Biodiversity Survey & Report	Not Required
Flood Risk Assessment	Included
Foul Sewerage Assessment	Not Required
Geotechnical Appraisal	Not Required
Health Impacts	Not Required
Heritage Assessment (including historical features and Scheduled Ancient Monuments) / Conservation Area Appraisal	Not Required
Hydrological and Hydrogeological Assessment	Not Required
Land Contamination Assessment / Contamination Risk Assessment	Not Required
Landscape Assessment	Included
Landscaping Details	Not Required
Lighting Assessment	Not Required
Minerals Safeguarding	Not Required
Noise Impact Assessment	Included
Odour Impact Assessment	Not Required
Parking & Access Arrangements	Not Required
Phasing / Working Programme	Not Required
Photographs/Photomontages	Not Required
Planning Obligations	Not Required
Draft Head(s) of Terms (s.106 Town and Country Planning Act 1990)	Not Required
Playing Fields and Recreational Facilities	Not Required
Public Rights of Way	Not Included
Renewable Energy and Climate Change	Not Required
Restoration and Aftercare Statement/Plans	Not Included
Statement of Community Involvement	Not Required
Structural Survey	Not Required
Survey of Levels	Not Required
Transport Assessment	Not Required
Travel Plan	Not Required
Tree and Hedgerow Survey/Arboricultural Report	Not Required
Utilities Statement	Not Required
Vermin and Birds	Not Required
Waste Audit and Waste Management Facilities Strategy	Not Required