

# GPP

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## PLANNING STATEMENT/ DESIGN AND ACCESS STATEMENT

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SECTION 73 APPLICATION TO VARY CONDITION 3 OF  
PLANNING PERMISSION 16/00039/WASFUL

CROWN HOUSE, CORBY

RECYCLEFORCE

Version 6  
Status FINAL

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APPENDICES

**APPENDIX 1: Transport Statement (November 2017)**

## 1 INTRODUCTION

### 1.1 The Planning Application

- 1.1.1 This Section 73 Planning Application is submitted to Northamptonshire County Council on behalf of Recycleforce Limited (the Applicant) seeking planning permission for an increase in waste throughput at their existing recycling facility located at Crown House, Gretton Brook Road, Earlstrees, Corby, NN17 4BA.
- 1.1.2 The background to this proposal is that the Applicant intends to supply Refuse Derived Fuel (RDF) to a local 'Energy from Waste' gasification plant to be located on land off Gretton Brook Road, Corby, as well as continuing to supply recyclates and baled waste to the market. The gasification plant has not yet been built but construction is anticipated to commence in 2018. The relevant planning permission reference is 08/00097/WAS for "*the establishment of a renewable fuel production and recycling facility at land off Gretton Brook Road, Corby*". A separate retrospective planning application, seeking temporary planning permission to amend the approved site layout, will be submitted shortly.
- 1.1.3 This submission includes the following documents and drawings:

#### **Documents**

- Planning Form/Certificates;
- Planning Statement / Design and Access Statement); and
- Transport Statement (November 2017).

#### **Drawings**

- Site Location Plan - GPP/RF/CHC/17/01 (Rev 1)
- Site Plan – GPP/RF/CHC/17/02 (Rev 1)

#### **Fee**

- Cheque made payable to Northamptonshire

### 1.2 The Application Site and its Setting

- 1.2.1 The Proposed Development is located on Earlstrees Industrial Estate on the north-eastern side of Corby and comprises part of the warehouse building that used to occupy the Corby Bottlers distribution facility.
- 1.2.2 The nearest residential properties are located in excess of 500m from the Application Site on Hubble Road.
- 1.2.3 The Site benefits from direct access onto the strategic highway network via its access onto Gretton Brook Road.
- 1.2.4 The Site lies within Flood Zone 1. The nearest water body is Gretton Brook which is classified as a main river and runs to the north side of Gretton Brook Road.

1.2.5 The Site is located on an established, operational industrial estate and, as such, there is no ecological interest at the Site or its surrounding environs.

### 1.3 Planning History

1.3.1 The Application Site sits within a former Enterprise Zone, likely to have been designated in the 1980's. The general industrial building located within the Application Site was thought to be constructed without the need for planning permission under the planning controls of the former Enterprise Zone.

1.3.2 The building has a B8 use class.

1.3.3 On 8<sup>th</sup> September 2010, Northamptonshire County Council granted planning permission (Reference: 10/00047/WAS) for the change of use to a Materials Recycling Facility.

1.3.4 Corby Borough Council granted planning permission for a change of use to B2 (General Industrial Use) on 20<sup>th</sup> September 2010 (Reference: 10/00284/COU).

1.3.5 On 21<sup>st</sup> December 2010, a Certificate of Lawful Development was issued by Northamptonshire County Council for Crown House as follows;

*Certificate of Proposed Lawful Use for a Materials Recycling Facility for dry recyclable waste from both the municipal and commercial sectors in accordance with the submitted statement, in particular:*

- *Up to a maximum of 75,000 tonnes per annum;*
- *All wastes to be received and processed inside the building and yard will only be used for the parking of vehicles; and*
- *The proposed treatment to consist of manual sorting, separation, screening, shredding, baling or compaction of waste into different components for recovery.*

1.3.6 On 21<sup>st</sup> May 2012, planning permission (Reference: 12/00011/WAS) was granted for waste use of 2 Brunel Road and extend waste uses into the yard to the east of Crown House.

1.3.7 On 14<sup>th</sup> May 2014, planning permission (Reference: 14/0006/WASFUL) was granted for the outside storage of waste.

1.3.8 Planning permission was granted on 19<sup>th</sup> January 2017 for the "*redevelopment of existing materials recycling facility including the reconstruction of a fire-damaged building at Crown House, Gretton Brook Road, Earlstrees Industrial Estate, Corby, NN17 4BA*". (Reference: 16/000/39/WASFUL)

1.3.9 The Site is permitted to accept materials consisting of plastics, glass, ferrous and non-ferrous metals, paper and card separating them through a series of physical processes before being bulked up for onward transportation.

1.3.10 Condition 3 of the latest planning permission restricts the amount of imported municipal, commercial and industrial waste to 100,000 tonnes per annum (tpa).

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## 2 PROPOSED DEVELOPMENT

### 2.1 Introduction

2.1.1 The Applicant intends to supply RDF to a nearby energy from waste gasification plant off Gretton Brook Road. It is proposed that RDF is recovered as part of the on-going Recycleforce recycling operations. There is an identified need to supply 120,000 tonnes of RDF to the gasification plant and 80,000 tonnes of recyclates and baled waste to the market. This application seeks to vary condition 3 of planning permission Reference:16/00039/WASFUL accordingly.

### 2.2 Overview of Current Operations

2.2.1 Planning permission was granted on 19<sup>th</sup> January 2017 for the "*redevelopment of existing materials recycling facility including the reconstruction of a fire-damaged building at Crown House, Gretton Brook Road, Earlstrees Industrial Estate, Corby, NN17 4BA*" (Ref 16/00039/WASFUL).

2.2.2 The existing Materials Recycling Facility (MRF) processes up to 100,000 tonnes of waste materials per annum consisting of plastics, glass, ferrous and non-ferrous metals, paper and card. Materials are separated by a series of physical processes, both automated and manual and subsequently bulked up for onward transportation to their final recycling or disposal destinations.

2.2.3 Until the fire-damaged recycling hall is re-built, all recycling is taking place outside in the yard. All unloading is carried out externally. Materials are put through a series of material separation machinery. Once separated, the waste materials are either baled (paper, plastic, card), bulked (metals), crushed and bulked (glass), containerised and bulked (glass) or containerised (where the residual fines are sent off site or used as fuel). The new layout of the recycling operations is being regularised under a separate and parallel planning application.

### 2.3 Increased Waste Throughput

2.3.1 Condition 3 of the extant planning permission (Reference: 16/00039/WASFUL) restricts the quantities of imported municipal, commercial and industrial waste throughput to 100,000tpa. This application, therefore, seeks to increase waste throughput from 100,000tpa to 200,000tpa in order to ensure a continuous supply of RDF to the gasification plant.

#### Existing HGV Movements

2.3.2 Despite planning permission to process up to 100,000tpa of waste throughput, weighbridge data confirms that the site is currently processing around 58,270tpa. This equates to an average of 36 HGVs importing material per day (72 movements) and 11 HGVs exporting material per day (22 movements).

2.3.3 On the basis that throughput was aligned with the current planning permission and processed 100,000tpa, there would be around 62 HGVs (resulting in 124 two-way movements) importing waste materials and 19 HGVs (resulting in 38 two-way movements) exporting processed goods.

### Proposed HGV Movements

- 2.3.4 This planning application seeks to increase the permitted throughput at the Site from 100,000tpa to 200,000tpa. The applicant intends to send 120,000tpa of RDF to a local gasification facility. The remaining 80,000tpa of recyclates and baled waste will be taken to market as per the existing commercial arrangements.
- 2.3.5 A Transport Statement (November 2017) has been independently prepared to consider the existing activities at the Site, existing transport conditions and trip generation, HGV routing and the transport implications of the Proposed Development. An overview of the findings is presented in Section 6 of this Planning Statement and a full copy of the Transport Assessment is appended to this document at Appendix 1.
- 2.3.6 There will be no change to the existing access arrangements.

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## 3 ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS

### 3.1 Overview

3.1.1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, set out the criteria for Schedule 1 developments for which an Environmental Impact Assessment (EIA) is mandatory and a list of Schedule 2 developments for which an EIA may be required. An assessment of whether the proposed development falls within Schedule 1 or Schedule 2 is set out below.

#### **Schedule 1**

3.1.2 Schedule 1 identifies twenty different categories of development which requires EIA. The Proposed Development is not listed as a Schedule 1 development.

#### **Schedule 2**

3.1.3 In terms of Schedule 2 of the Environmental Impact Assessment Regulations 2017, the Proposed Development falls within paragraph 11(b) which states that an EIA may be required should the area of development exceed the indicative threshold of 0.5ha.

3.1.4 The basic test of the need for an EIA, in a particular case, is the likelihood of significant adverse effects on the environment by virtue of factors such as its nature, size and location. National Planning Practice Guidance states that an EIA may be required for Schedule 2 developments in three cases;

- For major developments which are of more than local importance;
- For developments which are proposed within particularly environmentally sensitive or vulnerable locations; and
- For developments with unusually complex and potentially hazardous environmental effects.

3.1.5 The EIA Regulations provide definitions of those areas that are regarded as 'sensitive' and these include Sites of Special Scientific Interest (SSSI), National Parks, Areas of Outstanding Natural Beauty, World Heritage Sites, Conservation Areas, Scheduled Ancient Monuments and internationally designated sites. None of these apply in this case.

3.1.6 The NPPG states that;

*The aim of the EIA is to protect the environment by ensuring that a Local Planning Authority, when deciding whether to grant planning permission for a project is likely to have significant effects on the environment, does so in the knowledge of the likely significant effects and takes this into account in the decision-making process.*

3.1.7 It then goes on to suggest that;

*The more environmentally sensitive the location, the more likely it is that the effects will be significant and require an assessment.*



## Changes or Extensions

- 3.1.8 Paragraph 13b of Schedule 2 of the EIA Regulations relates to “*any change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed*”.
- 3.1.9 In this case the development is listed as paragraph 11b and therefore falls under 13b consideration. The relevant criterion relating to the Proposed Development under 13b states;
- Either;*
- 1) *The development as changed or extended, may have significant adverse effects on the environment; or*
  - 2) *In relation to development of a description mentioned in column 1 of this table applied to the change or extension are met or exceeded.*
- 3.1.10 The test in relation to the need for EIA in this particular case is the likelihood of significant adverse effects on the environment.

## 3.2 Screening

- 3.2.1 In determining whether a proposed development is subject to an EIA, a ‘screening’ process is used to determine whether the Proposed Development is likely to give rise to significant adverse effects on the environment.
- 3.2.2 It is the role of the Local Planning Authority to determine whether the Proposed Development is a type listed in Schedule 1 of Schedule 2 of The Regulations.
- 3.2.3 If the Proposed Development is listed in Schedule 2 and exceeds the relevant thresholds or criteria set out in the exclusions threshold and criteria list, the Proposed Development will need to be screened by the Local Planning Authority to determine whether significant effects are likely and hence whether an EIA is required.
- 3.2.4 Notwithstanding this, National Planning Practice Guidance warns that;
- It should not be presumed that development above the indicative threshold should always be subject to assessment or those falling below these thresholds could never give rise to significant effects especially where the development is in an environmentally sensitive area. Each development will need to be considered on merit.*
- 3.2.5 With regard to the Proposed Development, a request for a formal Screening Opinion was submitted to Northamptonshire County Council on 11<sup>th</sup> October 2017. In their formal Screening Opinion response, dated 31<sup>st</sup> October 2017, Northamptonshire County Council as Local Planning Authority concluded that;

*Whilst it is acknowledged that the proposed increase in the annual throughput from 100,000 to 200,000 tonnes does exceed the 50,000 tonnes per year threshold, the site is an existing waste management site and the characteristics of the development are therefore already established. The geographical location of the development is not considered to be environmentally sensitive as the site is located within a busy industrial estate and it is a continuation of the existing land use. The characteristics*

*of the potential impact of the development are also not considered to be environmentally significant. The proposed development is therefore considered **not** to require Environmental Impact Assessment.*

3.2.6 This Application is therefore not supported by an Environmental Statement.

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## 4 PLANNING POLICY CONTEXT

### 4.1 Introduction

4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the determination of a Planning Application must be made in accordance with the Development Plan, unless material considerations indicate otherwise. In this case, the Development Plan consists of the following documents;

- North Northamptonshire Joint Core Strategy 2011-2031 (adopted July 2016); and
- Northamptonshire Minerals and Waste Local Plan (adopted July 2017)

4.1.2 Other material considerations include the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and National Planning Policy for Waste (NPPW). Relevant policies of the Development Plan are identified below along with the main documents that are likely to be considered material to the Application.

### 4.2 The Development Plan

#### **North Northamptonshire Joint Core Strategy**

4.2.1 The relevant policies of the Joint Core Strategy are considered to be:

- Policy 1: Presumption in Favour of Sustainable Development; and
- Policy 22: Delivering Economic Prosperity.

#### **Northamptonshire Minerals and Waste Local Plan**

4.2.2 The Northamptonshire Minerals and Waste Local Plan sets out the land use planning strategy for minerals and waste related development in the County. The relevant policies of the Minerals and Waste Plan are considered to be:

- Policy 10: Northamptonshire's Waste Management Capacity; and
- Policy 11: Spatial Strategy for Waste Management.

4.2.3 Paragraph 5.52 that supports Policy 11 notes that;

*The intended functional role of facilities should be considered within the broader context of creating a sustainable waste management network within Northamptonshire. The intended functional role and contribution that the development makes towards the waste management capacity requirements should be clearly set in the proposal.*

4.2.4 It goes on to state that;

*Proposals should also demonstrate that the intended catchment area for the facility is in general conformity with the principle of managing waste close to its source. In this regard, the operation of the facility should minimise transportation of waste from its source and collect and recover waste in the most efficient way possible.*

4.2.5 The following policies are also considered to be relevant;

- Policy 12: Development Criteria for Waste Management Facilities (Non-Inert and Hazardous);
- Policy 13: Locations for Waste Management Facilities identifies Earlstrees in Corby as an acceptable, in principle, location for waste management uses;
- Policy 18: Addressing the Impact of Proposed Minerals and Waste Development;
- Policy 19: Encouraging Sustainable Transport;
- Policy 21: Landscape Character; and
- Policy 23: Layout and Design Quality.

### 4.3 Other Material Considerations

4.3.1 The National Planning Practice Guidance confirms that the National Planning Policy Framework represents up-to-date government planning policy and must be taken into account where it is relevant to a planning application. The content of the following documents is therefore considered material to the determination of this planning application.

- National Planning Policy Framework (March 2012)
- National Planning Policy for Waste (October 2014)

## 5 ASSESSMENT OF PROPOSAL

### 5.1 Introduction

5.1.1 From an assessment of the Development Plan and other relevant material, the following are considered to be the main planning issues associated with the application proposal:

- The Waste Hierarchy;
- Location of Development;
- Waste Management Capacity & Need;
- Catchment Area; and
- Development Criteria for Waste Management Facilities.

5.1.2 Environmental considerations are dealt with separately within Section 6.

5.1.3 The above matters are considered in turn below.

### 5.2 The Waste Hierarchy

5.2.1 At a European level, the EU Waste Framework Directive provides the legislative framework for the collection, transportation, recovery and disposal of waste. The Directive requires Member States to take appropriate actions to encourage firstly, the prevention or reduction of waste production, and secondly the recovery of waste by means of recycling, reuse or reclamation. Article 4 of the Revised EU Framework Directive sets out the five steps for managing waste in order of environmental impact, known as the Waste Hierarchy. The Waste Hierarchy was subsequently transposed in UK law through The Waste (England and Wales) Regulations, 2011 and is a material consideration when determining individual proposals for waste management facilities.

5.2.2 Paragraph 5.2 of the adopted MWLP notes that although the County has made progress with regard to waste management "*there is still a need to continue to drive waste up the waste hierarchy, recognising waste as a resource and maximise recovery*" in line with the aspirations of the Waste Hierarchy.

5.2.3 The Proposed Development presents an opportunity to increase the quantities of waste to be processed and recycled, thus forcing waste streams up the Waste Hierarchy. The NPPG notes that the Waste Hierarchy is capable of being a material consideration. As such, the proposal's compliance with the Waste Hierarchy should, therefore, be afforded due weight in the planning balance.

### 5.3 Location of Development

5.3.1 The Waste Spatial Strategy in the Northamptonshire Minerals and Waste Local Plan sets out the expected location of a network of waste management facilities in the County. Policy 11 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”.*

- 5.3.2 The application proposal is situated in Corby and is therefore compliant with the Waste Spatial Strategy and Policy 11.
- 5.3.3 Paragraph 5.61 of the adopted MWLP notes that within the central spine *the spatial strategy for waste management uses will be (inter alia) general industrial areas*. Policy 13 identifies general industrial areas that may be acceptable in principle for accommodating waste related uses. The plan associated with Appendix 3 of the adopted Minerals and Waste Local Plan sets out the boundaries of designated industrial area locations and allocated sites for waste management development. WL16 identifies the Earlstrees Industrial Estate in Corby within which the Application Site is situated.
- 5.3.4 The Proposed Development is not in conflict with the spatial strategy for waste management and is therefore compliant with Policies 11,12 and 13 of the adopted MWLP.

## 5.4 Waste Management Capacity & Need

- 5.4.1 The adopted MWLP identifies that the current permitted capacity for Materials Recycling Facilities and Transfer Stations is 3.04 million tonnes per annum. This is calculated on the basis of current, permitted and committed waste management sites as identified in Appendix 4: Commitments for Waste Management and Disposal. It is important to note that permitted capacity may be significantly different from the operational capacity due to permissions not being implemented.
- 5.4.2 Policy 12 of the adopted MWLP states that proposals for waste management facilities, including at existing facilities and extensions to existing facilities, must demonstrate that the proposed development will facilitate the delivery of Northamptonshire’s waste capacity requirements and clearly establish a need for the facility.
- 5.4.3 Both the Crown House Site and the Gretton Brook Road gasification plant are identified as committed sites within Appendix 4 of the adopted MWLP and are therefore incorporated into the current capacity calculation.
- 5.4.4 Following an assessment of waste arisings and permitted waste management capacity in the County, Policy 10 of the adopted MWLP sets out Northamptonshire’s waste management capacity. It states that:

*The development of a sustainable waste management network to support growth and self-sufficiency within Northamptonshire will involve the provision of facilities to meet the following indicative waste management capacity requirements during this plan period.*

- 5.4.5 The second part of the policy sets out the hierarchy level, divided into preparing for re-use, recycling and recovery, the management method and indicative capacity requirement.
- 5.4.6 The facility at Crown House falls under preparing for reuse and recycling and the recycling (non-inert) management method. Policy 10 identifies a future indicative capacity gap for (non-inert) recycling as 0.26mtpa in 2021 and rising to 0.28mtpa in 2031. Policy 10 clearly identifies that additional (non-inert) recycling capacity will be needed over the plan period to 2031.

- 5.4.7 Policy 10 of MWLP also confirms how additional capacity will be provided. Provision *“will come from a mix of existing sites, intensification or redevelopment of existing sites and new sites, providing that the spatial strategy for waste management and are assessed as meeting environmental, amenity and other requirements”*.
- 5.4.8 Paragraph 5.36 of the adopted MWLP clearly identifies that committed sites will *“make a fundamental contribution in delivering the waste infrastructure that will enable the treatment of Northamptonshire’s waste to 2031, and for the Local Plan to meets its objectives”*.
- 5.4.9 The proposed increase in tonnages of 100,000tpa will provide circa 38.5% of the indicative (non-inert) indicative capacity requirement at 2021. In conclusion, the proposed increase in tonnages makes a significant contribution to meeting the capacity gap. The proposal is therefore compliant with Policies 10 and 12 of the adopted Minerals and Waste Local Plan.

## 5.5 Catchment Area

- 5.5.1 The adopted MWLP requires proposals to identify the relevant catchment area and demonstrate how this is linked to the site. In this case, a catchment area was approved in connection with Planning Permission 12/00011/WAS; reference GPP/FR/CBR/12/04 rev 1. This area remains relevant to the proposed operations at the site. Planning permission 16/00039/WASFUL has not yet been implemented. Condition 20 of that permission requires the submission of a catchment area plan prior to the commencement of development.

## 5.6 Development Criteria for Waste Management Facilities

- 5.6.1 Policy 12 of the Adopted MWLP sets out the overarching development criteria for non-inert waste management facilities. The proposed increase in tonnage is wholly consistent with the spatial strategy. There is a clear and defined need for the additional throughput that facilitates the delivery of waste management capacity requirements in a sustainable manner.

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## 6 ENVIRONMENTAL CONSIDERATIONS

### 6.1 Overview

6.1.1 Having regard to the formal Screening Opinion, the Development Plan and national policy guidance, the main environmental considerations associated with the Proposed Development are:

- Traffic and Transportation;
- Ecology;
- Landscape and Visual Impact;
- Odour;
- Noise;
- Dust;
- Surface Water Drainage and Flood Risk; and
- Design and Access Statement.

6.1.2 Policy 18 of the adopted MWLP provides an overarching requirement for proposals to be acceptable in terms of their impact upon the environment. It states that;

*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, bird strike, litter, land use conflict and cumulative impact;*
- *impacts on flood risk as well as the flow and quantity of the surface and groundwater;*
- *ensuring the 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.*

6.1.3 The following sections assess the potential impacts from the Proposed Development.

### 6.2 Traffic and Transportation

#### **Introduction**

6.2.1 Origin Transport Consultants Ltd has been commissioned to prepare a Transport Statement to accompany this Planning Application. The full report is appended to this document as Appendix 1.

6.2.2 The Transport Statement summarises the existing activities at the Site, considers the transport conditions in the vicinity of the Site, the trip generation, HGV routeing and the transport implications of the Proposed Development.



### **Transport Policy**

- 6.2.3 The Transport Assessment was carried out having regard to the National Planning Policy Framework, Policy 18 of the North Northamptonshire Joint Core Strategy (2011-2031), Northamptonshire Highway Development Management Strategy (December 2013), and the Northamptonshire Transportation Plan, Local Transport Plan, March 2012. The latter recognises Corby as a growth town, as identified in the Core Strategy, and highlights the fact that the impact of this growth can lead to congestion in and around Corby by 2021, if not tackled effectively. Its vision states that;

*Economic growth and prosperity is a top priority for Northamptonshire and connectivity has a vital role to play in encouraging businesses to locate to the area. Expanding networks and capacity of networks in Northamptonshire will be fully integrated into new developments and regeneration areas to support more sustainable communities.*

### **Existing Conditions**

- 6.2.4 The Site is located in Earlstrees Industrial Estate, Corby, Northamptonshire. The Transport Statement notes that Gretton Brook Road (A6116) provides a link between various other A Roads, namely the A6003, located approximately 2km to the west of the Site, the A427 at approximately 3.2km to the south of the Site and the A43 situated approximately 2.5km to the south east of the Site.
- 6.2.5 Access to the Site is currently gained from the A6116 and this will remain unchanged. The Site is served by a simple priority T-Junction. No accidents have been recorded at the access junction.
- 6.2.6 The Transport Statement considers the visibility requirements in line with national guidance and conclude that the visibility splays from the proposed access exceed the minimum requirements set out in national guidelines.

### **Traffic Flow**

- 6.2.7 An automatic classified traffic count was undertaken at the Site access junction on Gretton Brook Road on Thursday 12<sup>th</sup> October from 07:00 to 10:00 and 16:00 to 19:00 hours. The network peak hours were found to be between 07:45 and 08:45 in the morning and 16:00 to 17:00 hours in the afternoon.
- 6.2.8 It was noted that there were a large number of vehicles including cars, light goods vehicles and Oversized Goods Vehicles (OGVs) travelling along Gretton Brook Road in the network peaks. As anticipated, it was also noted that there were a large number of OGVs entering/egressing the industrial access in comparison to the other modes of transport.

### **Assessment of Proposal**

- 6.2.9 In order to present the most robust assessment, the Transport Statement presents two scenarios:

- Scenario 1 involves increasing the quantity of materials processed at the Site from 100,000tpa to 200,000tpa, all of which will be distributed to the market consistent with the distribution of the existing processed materials exported from the Site; or
- Scenario 2 involves increasing the quantity of materials processed at the Site from 100,000tpa to 200,000tpa, 120,000 of which will be dispatched to the RDF facility, the remainder of which (80,000tpa) will be dispatched to market.

6.2.10 The hours of operation for outside waste activities are controlled by Condition 5 of planning permission 16/00039/WASFUL. Hours are limited to 07:00 to 19:00 Monday to Friday and 08:00 to 17:00 on Saturdays.

### **Existing Trip Generation**

6.2.11 At present, the Site has planning consent to process up to 100,000tpa of municipal, commercial and industrial waste. The weighbridge data for August-September 2017 indicates that the site is currently processing just around 58,270 tonnes per annum.

6.2.12 On the basis of the existing vehicle data, the Transport Statement shows that, on a daily basis, this results in around 36 vehicles (resulting in 72 two-way movements) importing waste materials and 11 vehicles (resulting in 22 two-way movements) exporting processed goods based on the site processing around 58,720tpa. This is a total of 94 daily two-way movements.

6.2.13 These figures are less than those that would be associated with consented (100,000 tpa movements). On a daily basis, consented movements would result in around 62 vehicles (resulting in 124 two-way movements) importing waste materials and 19 vehicles (resulting in 38 two-way movements) exporting processed materials from the site.

### **Proposed Trip Generation**

#### Scenario 1

6.2.14 Scenario 1 involves increasing the quantity of materials processed at the Site from 100,000tpa to 200,000tpa, all of which is assumed to be distributed to market along with the existing processed materials produced at the Site.

6.2.15 When compared to the existing planning consent, this Scenario would generate an additional 162 two-way movements daily broken down as 62 in and 19 out.

#### Scenario 2

6.2.16 This Scenario is based on the likelihood that 120,000tpa will be dispatched to the local gasification facility whilst the remaining 80,000tpa will be taken to market. This would result in additional trips generated when compared to the existing and consented development, however the overall impact on the wider road network would be less, with the majority of the additional trips only travelling 800m to the nearby facility.

6.2.17 When compared to the existing planning consent, Scenario 2 will result in a daily increase of 166 two-way movements, as opposed to 162 two-way movements associated with Scenario 1.

### **Site Access**

6.2.18 Analysis of operational movement at the site access junction confirms that the junction can accommodate the likely levels of trip generation associated with both Scenarios.

### **Parking Provisions**

- 6.2.19 The Site currently employs a maximum of 30 staff at the Site. There will be no increase in staff as a result of the Proposed Development. Existing arrangements for staff parking and cycle parking will remain unchanged.
- 6.2.20 There is sufficient space on-site for HGV and van parking in accordance with the standards set out in the Northamptonshire Parking Standards (2016).

### **Conclusions**

- 6.2.21 The Transport Statement concludes that there are no specific safety concerns on the local highway network relating to the Site access junction.
- 6.2.22 There will be sufficient manoeuvrability on Site for HGVs to enter and exit in forward gear and HGVs can pass each other along the majority of the road access.
- 6.2.23 A trip generation analysis has shown that, on the basis of a worst-case scenario, the Site is likely to generate 328 two-way HGV movements per day, a daily increase of 166 two-way movements when compared to the permitted operation.
- 6.2.24 The Transport Statement notes that the strategy is export 120,000tpa to a local gasification plant, which is located 800m to the east. Under this arrangement, the Statement notes that the transport implications on the wider network will be less than the existing situation.
- 6.2.25 Operational assessments have shown that with the proposed trips included, the Site access junction will continue to operate in the future year with a significant amount of spare capacity. Additional trips are concluded to have a negligible impact on the operation of the junction. As a result, the impact of the Proposed Development on the surrounding highway is not considered to be severe.
- 6.2.26 The Transport Statement concludes that the Proposed Development is compliant with both national and local policy and there are no highway or traffic reasons why planning permission should not be granted.

## **6.3 Ecology**

- 6.3.1 Policy 18 of the adopted MWLP requires that any proposed development should protect Northamptonshire's natural resources and key environmental designations. This sentiment is also echoed in national policy within the NPPF and the NPPW's guidance notes.
- 6.3.2 The Proposed Development is situated within the heart of Earlstrees Industrial Estate, an established and fully operational industrial estate. The Site does not contain features of nature conservation interest. The proposed increase in tonnages would not result in adverse impacts on features of nature conservation interest in compliance with both Policy 18 of the adopted MWLP and the NPPG.

## 6.4 Landscape and Visual Impact

6.4.1 Policy 18 of the adopted MWLP seeks to “ensure that the built development is of a design and layout that has regard to its visual appearance in the context of the local area”. This is then supplemented by Paragraph 7 of the NPPW (Appendix B) which states that there is a need to assess:

- a) the potential for design-led solutions to produce acceptable development, which respects landscape character;
- b) the need to protect landscapes or designated areas of national importance; and
- c) localised height restrictions.

6.4.2 The site lies within an established, operational industrial area. The proposed development relates to an increase in throughput only. There would be no associated changes to the Site. The Proposed Development will not give rise to impacts on either the landscape or give rise to visual impacts. The Proposed Development is therefore compliant with Policy 18 and 21 of the adopted MWLP and supplementary national guidance contained within the NPPW.

## 6.5 Odour

6.5.1 Policy 18 of the adopted MWLP considers the potential for odour. It states that any Proposed Development will need to consider “avoiding and/or minimising potentially adverse impacts to an unacceptable level, specifically ... odour.”

6.5.2 The site currently processes plastics, glass, ferrous and non-ferrous metals, paper and card. No malodourous waste is processed at the Site and this will remain the case. The nearest residential receptors are located in excess of 500m from the Site. The current operations have not given rise to odour complaints. The proposed increase in throughput at the Site will not result in additional odour and therefore is compliant with Policy 18 of the adopted MWLP.

## 6.6 Noise

6.6.1 Policy 18 of the adopted MWLP states that it is necessary to minimise noise at any proposed development. Appendix B of the NPPW states that;

*Considerations will include the proximity to sensitive receptors. The operation of large waste management facilities in particular can produce noise affecting both the inside and outside of buildings, including noise and vibration from goods vehicle traffic movements to and from a site. Intermittent and sustained operating noise may be a problem if not properly managed particularly if night time working is involved.*

6.6.2 The Site is situated within an existing industrial area amongst general industrial uses. The nearest residential receptors are located in excess of 500m from the Site. The two temporary picking lines that are subject to a separate application, will sort the waste streams and are not particularly noisy in terms of plant and thus far have not been subject to noise complaints from local residents.

6.6.3 The long-term aspiration of the Applicant is to re-build the fire-damaged recycling hall and install an automated state-of-the-art materials separation facility. This would, in the long-term,

remove the need for external picking lines, and ensure that all separation processes occur indoors.

- 6.6.4 The proposed increase in waste throughput will take place in accordance with the existing operating hours which will ensure that noise does not become a source of nuisance in the locality.
- 6.6.5 The proposed increase in throughput at the Site is, therefore, unlikely to cause any additional adverse noise impacts in the short term or long term. The Proposed Development is therefore compliant with Policy 18 and national planning guidance on noise.

## 6.7 Dust

- 6.7.1 Policy 18 of the Adopted MWLP also requires consideration of the risk of dust arising from the proposed waste management development. This is echoed in the NPPW which states that;

*Consideration will include the proximity of sensitive receptors, including ecological as well as human receptors, and the extent to which adverse emissions can be controlled through the use of appropriate and well-maintained and managed equipment and vehicles.*

- 6.7.2 The nearest residential properties are in excess of 500m from the Application Site.
- 6.7.3 Due to the nature of the waste streams entering the Site, there is currently no dust associated with the operation of the Site and, as a result, there has been no dust complaints associated with the current operation.
- 6.7.4 The proposed increase in waste throughput does not seek to alter the nature of the waste streams that are currently processed at the Site and will not increase the risk of the Site becoming a dust nuisance.

## 6.8 Flood Risk

- 6.8.1 Policy 18 of the adopted MWLP seeks to secure against the "impacts on flood risk as well as the flow and quantity of the surface and ground water".

- 6.8.2 Appendix B of the NPPW further considers the impact of flood risk, warning that;

*Considerations will include proximity of vulnerable surface and groundwater or aquifers...The suitability of locations subject to flooding with consequent issues relating to the management of potential risk posed to water quality from waste contamination, will also need particular care.*

- 6.8.3 The Application Site is located in Flood Zone 1 and has a less than 1 in 1000 probability of flooding. The Application Site has a long planning history. Flood risk has been assessed in the past and it was concluded that there are no significant adverse risks of flooding at the Site. The proposed increase in tonnages would not materially alter the Site and there will be no additional flood risk as a result of the Proposed Development. The Proposed Development is therefore compliant with Policy 18 of the adopted MWLP and national guidance on flood risk.

## 6.9 Design and Access

- 6.9.1 The Proposed Development relates to increasing the tonnage throughput at the facility and an amendment to an existing condition. A separate planning application is being submitted that addresses a revised site layout and the infrastructure necessary to process the additional 100,000 tonnes of waste per annum. As a result, there are no relevant design matters that require consideration as part of this application.
- 6.9.2 A Transport Assessment accompanies this planning application. Details of the assessment are set out in Section 6. The conclusions of the assessment confirm that the existing access can safely accommodate the proposed increase in traffic without the need for any amendment.

## 7 CONCLUSION

- 7.1.1 The proposed increase in waste throughput has been assessed against the main policies of the MWLP and other relevant material considerations and is compliant in all respects.
- 7.1.2 The application proposal will meet a national and local need to increase recycling rates and prevent waste from being sent to landfill. The applicant's aspiration is to recover refuse derived fuel (RDF) and, in due course, export to it a local energy from waste plant. The proposal will therefore minimise the transportation of waste materials around the County by adding to a local recycling and bulking up facility.
- 7.1.3 The application is fully compliant with the waste spatial strategy for the County by being located in the central spine and as part of an industrial estate that is allocated for waste management uses. The applicant's aspiration of expanding an existing waste management facility is supported by the MWLP. The Crown House Site and the Grettton Brook Road gasification plant are both named as committed and established Sites within the adopted MWLP that are essential in contributing to the waste management capacity of Northamptonshire for the Plan period up until 2031.
- 7.1.4 The proposed increase in waste recycling throughput will contribute significantly to meeting the shortfall in future waste management capacity for recycling (non-inert) materials. The proposal is therefore supported by a local need that grows during the MWLP period.
- 7.1.5 The potential traffic impacts of the proposal have been assessed on a worst-case scenario basis and have found to be acceptable. In the most likely scenario of the application site supplying RDF to a local energy from waste facility, there would be an overall improvement on the wider transport network.
- 7.1.6 The proposal will not give rise to unacceptable impacts as a result of additional noise, dust and odour generation. There will also be no unacceptable impacts upon features of nature conservation interest or landscape or visual issues.
- 7.1.7 The Proposed Development is therefore considered to constitute sustainable development and is compliant with the Development Plan and the requirements of a suite of national policy including the NPPF, NPPG and NPPW.

**APPENDIX 1: Transport Statement (November 2017)**