Cemex UK Cement Ltd

Land at Patford Bridge, Great Brington, Northamptonshire

Proposed Construction of Pipeline Inspection Gauge Compound - Supporting Statement (v2)

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1.0 Introduction

1.1 WYG Environment Planning Transport has been instructed by Cemex UK Cement Limited (Cemex) to prepare a planning application on land at Patford Bridge, Great Brington for the construction of a Pipeline Inspection Gauge compound. The compound would provide a launch and receive facility for inspection tools that would transit the existing Cemex pipeline which runs through the site. The pipeline transports chalk slurry between the company’s Kensworth Quarry, Bedfordshire and Rugby Cement Works, Warwickshire.

The Applicant

1.2 Cemex UK Cement Ltd is part of CEMEX UK Operations Ltd which is a leading global producer and marketer of cement, concrete and other building materials. In the UK it is the leading producer of ready mix concrete and the second-largest manufacturer of aggregates, and the third-largest cement and asphalt producer, with a significant share of the roof tile, concrete block markets. Cemex UK Cement Ltd is the leading supplier of concrete sleepers to the UK’s rail industry and a dominant supplier of Pulverised Fuel Ash (PFA) cement additives. The freehold of the application site is with The Rugby Group Ltd, which is part of Cemex UK Operations Ltd.

Submitted Documents

1.3 Supporting Statement which includes:
   - Appendix 1: Planning Application Forms and Certificates
   - Appendix 2: Application Plans
     - P1/5021/1 Site Location Context Plan (1:25000 A4)
     - P1/5021/2 Location Plan (1:2500 A4)
     - P1/5021/3 Existing Site Layout (1:200 A1)
     - P1/5021/4 Rev A Proposed Site Layout (1:200 A1) (including details of landscape planting and accompanying planting schedule)
     - P1/5021/5 Rev A Section Views (1:100 A1)
   - Appendix 3: Badger Survey, Advice Note prepared by Bowland Ecology Ltd (July 2012)
   - Appendix 4: Flood Risk Assessment, prepared by Hafren Water (March 2013)
   - Appendix 5: Essential requirements for a suitable site for cleaning activities and summary analysis of alternative sites considered
   - Appendix 6: Lighting Design and DiaLux Calculations
2.0 Statutory Background

Pre-Application

2.1 A Cemex representative met with officers from Northamptonshire County Council (NCC) on site on 22nd May 2012 to discuss the proposed development and to agree the extent of technical assessment required in support of the planning application.

Environmental Impact Assessment

2.2 The Town & Country Planning (Environmental Impact Assessment) Regulations 2011 (Statutory Instrument 2011 No. 1824) – also known as the EIA Regulations – form part of the development control system in England. The EIA Regulations only apply to certain types of development which are listed as Schedule 1 development, or Schedule 2 development and likely to have significant effects on the environment.

2.3 It is considered that the proposals are not EIA development as it does not fall within either Schedule or within a Sensitive Area, and would not give rise to significant environmental effects.

Design and Access Statement

2.4 As the application is for mineral development a Design and Access Statement is not required.

Permitted Development Works

2.5 Cemex is currently undertaking annual temporary maintenance works on the site that are necessary to maintain the integrity of the pipeline and to fulfill requirements of the Health and Safety Executive. The works involve limited excavation and installation of temporary pipework to launch and receive the cleaning and inspection tools into the pipeline, and fall within the provisions of Part 10 of Schedule 2 of the General Permitted Development Order 1995. On completion of the temporary inspection process the pipework would be removed, the site cleared and land restored back to farmland.

Planning Fee

2.6 Under the ‘The Town and Country Planning (Fees for Applications, Deemed Applications, Request and Site Visits) (England) Regulations 2012’, this planning application falls within the category ‘Erection/alterations/replacement of plant and machinery’. The application is for an area covering 0.4 hectares and therefore a fee of £1,540 has been submitted with the planning application.
3.0 Location and Site Description

Location

3.1 Patford Bridge is located some 2.5km northwest of Great Brington, Northamptonshire. The application site comprises approximately 0.4 ha and is centred on NGR 464621 266362. The location context of the site is shown on Figure 1 below:

Figure 1: Site Location Context Plan

Description

3.2 The application area is situated within an area of farmland. It lies within a wider arable landscape with a network of hedgerows, small streams and a number of small stands of woodland. A newly planted hedgerow and an existing public footpath/bridleway border the western side of the site. Beyond the footpath lies an area of deciduous woodland through which flows the Whilton Branch of the River Nene and beyond that an electricity compound. Brington Road runs along the northern
boundary and to the south is a railway embankment and existing hedgerow. To the east of the site the arable field continues in a strip between the railway embankment and Brington Road.

3.3 The site is broadly flat and situated at approximately 105m AOD with a slight fall in elevation from westwards towards the adjacent Branch of the River Nene. The existing layout and topography of the site is shown on Plan P1/5021/3 (Appendix 2).

3.4 The nearest residential property lies approximately 725m to the north-west of the site. Residential properties lie between 900-1000m to the south-west, north and south-east.

3.5 There are no statutory designations within 2km of the site.

3.6 The site does not lie in a Groundwater Source Protection Zone. It lies in a Groundwater Vulnerability Zone classed as a Minor Aquifer Intermediate.

3.7 A Flood Risk Assessment (FRA) has been prepared by Hafren Water and is included at Appendix 4. The site is located within Flood Zone 3 on the Environment Agency Indicative Flood Map. The nearest surface water course is the Whilton Branch of the River Nene which runs adjacent to the western boundary of the site at a distance of approximately 17m at its closest proximity.

3.8 A badger survey has been undertaken by Bowland Ecology Ltd and their Advice Note is included at Appendix 3.

Access

3.9 There is currently no dedicated access to the site from Brington Road.

Background

3.10 Cemex owns and operates a 92km pipeline which runs from the Company’s Kensworth Chalk Quarry near Dunstable to Rugby Cement Plant in Warwickshire. The pipeline has been in operation since 1964 when it was installed under, and the route prescribed by, an Order given by the Ministry of Power under the Pipelines Act 1962. In general the pipeline travels through rural areas to avoid centres of population, the potential for disturbance to the line caused by the development of towns and villages, and to minimise the impact on centres of population caused by pipeline operations including relaying and repair work. The pipeline is vital to the operation of the Rugby Cement plant,
supplying chalk slurry which provides approximately 80% of the raw material requirement for the cement production facility.

3.11 The line had operated satisfactorily since its installation until a series of failures occurred in the early part of the decade 2000-2010. Investigation showed that these were due to pitting corrosion caused by sulphate reducing bacteria (SRB) which had colonised the line settling on the internal wall of the pipe. Under certain conditions the presence of SRB can cause accelerated corrosion of up to 2mm/year so reducing the thickness of the pipe wall and its ability to withstand the working pressure of the line. If the corrosion is allowed to continue unchecked it would significantly reduce the lifetime of the line with the only effective remedy being to re-press the line with its associated environmental impact and financial costs.

3.12 The SRB would, however, never be completely eradicated from the pipeline and the most effective solution is therefore to control the SRB populations and to remove the sulphide deposits which cause the corrosion. To monitor the effects of corrosion a cleaning and internal inspection programme has been developed over recent years which allows repairs to be planned and implemented prior to failure of the line. The inspection programme uses pipeline inspection gauges (commonly known as ‘PIGS’) to clean the internal walls of the pipeline of debris so that intelligent data logging tools can be run along the line to accurately measure its condition.

3.13 Currently maintenance works are required to be undertaken along the pipeline on an annual basis for around 3 weeks in order to clean the section of line sufficiently to allow inspection to take place. Permanent facilities are therefore required to enable the effective inspection and maintenance of the pipeline without the need for temporary excavation and maintenance works which are both disruptive and costly.

The Need for Intermediate Cleaning Stations

3.14 Experience has shown that it is not possible to clean the pipeline in one section from Dunstable to Rugby because the cleaning action wears out the cleaning tips and seal segments on the PIGs before they have travelled the full length of the line. Consequently this increases the risk of the PIG becoming stuck in the line, which would be very difficult to recover and require closure of the pipeline for a temporary period. Furthermore, the debris scraped from the internal surface of the line by the cleaning action of the PIG is pushed along the line ahead of the PIG and discharged at the receiving end. The quantity of the debris generated by a single run is too large to effectively handle at Rugby without risk of the line becoming blocked.
3.15 It is therefore necessary to split the line into 3 sections and to establish intermediate cleaning stations for the launch and receipt of the cleaning PIGS, with associated handling systems to deal with the cleaning water and debris generated by the cleaning activities.

3.16 A site at Brogborough, Central Bedfordshire has been used for a number of years for cleaning activities. This is an important site as the pipeline changes from 10” to 11” nominal bore at this location requiring the use of different sized tools for cleaning the Dunstable to Brogborough section as compared with the Brogborough to Rugby section. A further site is needed in a location that would provide a reasonable ‘split’ in the lengths of sections of the pipeline. An area in the north of Northamptonshire would provide for a reasonable distance from the site at Brogborough and the end of the pipeline at Rugby.

3.17 A number of sites have therefore been considered to the north of the Northampton conurbation in potential locations that would avoid the Salcey Forest area.

3.18 The suitability of a site for cleaning activities is determined by a number of essential requirements. These, together with the summary analysis of the alternative sites considered, are set out in Appendix 5.

3.19 It was concluded that the application site at Patford Bridge, Great Brington was the most suitable of the sites for the establishment of a permanent line cleaning facility as it not only fulfilled all of the essential requirements, but also had the advantage of being remote from habitation. Existing planting along the prominent railway embankment screens the southern perimeter of the proposed site and there is an established tree belt to the west of it. There is existing infrastructure development adjacent to and in the vicinity of the site in the form telecommunications masts and Network Rail infrastructure, and a large electricity substation compound to the west. Furthermore, throughout Northamptonshire the slurry line closely follows the route of a high pressure gas main separated by only a few meters. At Patford Bridge, the slurry line deviates into the application site away from the gas main (which continues to follow the line of the Bridleway) making for advantageous connection, and reducing the risk of interference from construction and operational activities associated with the gas main installation.
4.0 Proposed Development and Mitigation

4.1 The proposed development is a compound consisting of a Pipeline Inspection Gauge (PIG) launch station and lagoon, an associated access and vehicle turning area and landscape planting. The compound would service a chalk slurry pipeline which connects Kensworth Chalk Quarry in Bedfordshire to the Rugby Cement Plant in Warwickshire. The proposed layout of the site, and section views, are shown on Plans P1/5021/4 Rev A and P1/5021/5 Rev A and are included at Appendix 2.

4.2 It is proposed to modify the existing pipework with the provision of valves to enable launch and receive chambers to be constructed. These would be situated over a concrete apron with a sump constructed beneath the receiving chamber. The chambers would be used to catch inspection tools (PIGs) that had travelled along the pipeline from the intermediate launch/receive station proposed to be located at Brogborough, Bedfordshire and to launch tools that would travel to the end of the pipeline at the Rugby Cement Works. When not in use a bypass line would be provided to allow chalk slurry to be pumped direct to Rugby.

Construction Phase

4.3 The existing site levels shown on Plan P1/5021/3 would be adjusted by mechanical excavator to provide a level working area and to expose the existing pipeline. The spoil from this activity would be deposited on site to provide additional screening as shown on Plans P1/5021/4 Rev A and P1/5021/5 Rev A.

4.4 The pipe work would then be modified with the provision of valves to enable launch and receive chambers to be constructed.

4.5 The roadway forming the access would be laid with MOT type 1 material and a concrete apron and sump would be constructed by excavation, shuttering and mass fill reinforced concrete. It is not envisaged that any piling or ground stabilisation work would be required. Concrete bases for pipe supports, the electrical kiosk and lighting columns would also be created as required.

4.6 The duration of the construction phase is expected to be 20 weeks in total. Following completion of the civil engineering works the existing pipework would be modified by the insertion of prefabricated pipe sections, valves and supporting steelwork on the concrete apron to form the launch, receive and bypass facility. The electrical supply kiosk would be emplaced and ducting run for...
electrical cabling. Palisade fence and gates would be installed once all the major items of construction work had been completed. The temporary fencing would then be removed and final profiling of the site and removal of the welfare facilities undertaken.

4.7 A temporary welfare facility powered by a generator would be established on site during the construction phase. However, once operational, the site would be unmanned and consequently no welfare facilities would be required. The site would not normally be occupied except when pipeline tools are being ‘caught’ or ‘launched’ to the pipeline.

Operational Phase

4.8 When it is necessary to launch a tool from the Patford Bridge compound towards the Rugby Cement Works, the door at the launching chamber end would be opened and the tool inserted into the chamber and pushed to the end to form a seal between the pipe wall and the tool. The door is subsequently closed and valves are operated to direct pipeline flow through the chamber which then pushes the tool into the pipeline. Once this has taken place the valves would be re-set to take the launcher off line.

4.9 When the pipeline is cleaned and inspected the PIGs would travel in a 3-4 hour slug of water which would be introduced at the start of the line and pushed along by the high pressure pumps at Kensworth (the head of the line). Each PIG would have a transmitter within it and its progress would be tracked at a series of ‘listening points’ so that its arrival at the Patford Bridge station could be determined.

4.10 When receipt of the tool is imminent, the valves at Patford Bridge would be operated to direct the flow from the pipeline to the receiving chamber - a perforated pipe which allows water and debris to fall into the sump below while retaining and supporting the tool. A submersible pump in the sump would pump the water to a lagoon which would provide temporary storage and allow some settlement of debris (see paragraph 4.12).

4.11 On arrival of the PIG the valves would be returned to the normal position so that the flow of water could continue along the line to Rugby where facilities exist to separate the water from the slurry, and to dispose of it to a consented discharge. The water from the lagoon would then be re-injected into the line by a pump.
Purpose and Construction of the Lagoon

4.12 The lagoon would serve two functions. The first would be as a balancing facility as the normal pipeline flow is 250m³/hr whereas the capacity of the re-injection pump is approximately half this rate and so the water could not be pumped back in to the line at the same rate as it is discharged. The second function is as a temporary storage facility for the water from the pipeline where it may be operationally necessary to defer the re-injection of the water into the line when, for instance, the high pressure pumps are not running at Kensworth, or if slurry stock at Rugby is low. The capacity of the lagoon allows for temporary storage of water for around 6 cleaning/inspection runs.

4.13 The lagoon would be constructed by excavating the basic profile and then lining with sand to provide a barrier against sharp edges. A trench would be constructed around the perimeter of the lagoon and a flexible long life membrane liner laid to the base and sides of the lagoon. The edges of the liner would be laid in the peripheral trench which would then be backfilled with spoil to anchor the liner in place. At the lowest point of the lagoon a sealed connection would be made to the pipe leading to the re-injection sump. The location and anticipated dimensions of the lagoon are shown on Plan P1/5021/4 Rev A and section view “C-C” on Plan P1/5021/5 Rev A.

Re-Injection Sump

4.14 The re-injection sump would be formed of a pre-cast concrete chamber with lid and manhole access. The chamber would be connected at its base by a pipe to the lowest part of the lagoon. The re-injection pump would be brought to site as and when required and connected to permanent pipework leading down into the sump. This would provide for a safe connection between the lagoon outlet and the inlet hoses of the pump, and avoid the need to lay trailing hoses into the lagoon and or work in proximity to the open water body.

Access

4.15 The new access is proposed from the Brington Road, which would incorporate space to allow vehicles to park off the road should the gates be locked.

4.16 A new access track into the site would include a vehicle manoeuvring area and hard standing for parking vehicles whilst the site is in use as shown on Plan P1/5021/4 Rev A.
4.17 The site would not normally be manned except when pipeline tools are being caught or launched to the pipeline.

Traffic Movements and Control of Dust, Mud and Debris onto the Highway

4.18 During the construction phase cars, vans and LGVs would need access to the site. All deliveries would be routed either via Lodge Lane from B5385 from the A428, or along Brington Road from the Great Brington direction. Cars and light vans would also use this route in preference to travelling along Brington Road from the Long Buckby direction.

4.19 A maximum of approximately 20 vehicle movements per day to and from the site are anticipated during the peak of the construction works during a 10 hour working day, 6 days per week, with an average over the construction period of around 10 movements per day.

4.20 LGV movements would peak at the start and end of the construction phase as these would be required principally to move large items of mobile plant. A total of 8 LGV movements would be required to achieve this (4 at the start and 4 at the end of construction).

4.21 During construction, stone would be laid on the access track at the entrance to the public highway (Brington Road). A water bowser and pressure washer would be located close to the entrance to wash any dust dirt or debris from vehicles leaving the site. In addition the public highway would be inspected daily. It is anticipated that the on-site measures would be sufficient to adequately control mud and debris on the highway, but any residual dirt or debris arising from the construction activities would be removed by a mechanical road sweeper, brought to the site as required.

4.22 As previously stated, during operations, the site would normally be unmanned. Aside from times of periodic maintenance no vehicles would normally enter or leave the site. Maintenance and site inspection activities would generate approximately two vehicle movements (cars and vans) per week. During pipeline cleaning and inspection runs approximately eight vehicle movements (cars and vans) would take place each day over six days for a period of four weeks once per year.

Hours of Operation

4.23 The normal hours of operation would be 08.00 to 19.00 Monday to Saturday. However, some Sunday working would be required to tie in the new equipment to the pipeline at the end of the construction period. No more than one or two instances of working on Sunday are likely to be
required.

**Lighting and Security**

4.24 During the construction phase the site would be fenced with temporary ‘Heras’ type fencing. Once in operation the compound would be enclosed within a 2.4m high galvanised palisade fence similar to that provided for the nearby electricity substation.

4.25 Details of the luminaires (including DiaLux calculations) and type and manufacture of the light fittings proposed are included at Appendix 6. The six, 6m high columns would be positioned and oriented as shown on Plan P1/5021/4 Rev A.

4.26 As the site would normally be unoccupied the lights would not be in use unless triggered by the security system. The control switch would be located at the site entrance. The lighting column height would be below the height of the railway line. 45W LED lighting would be used and the proposed lighting levels would be 50 Lux for the working areas and 20 Lux for all walking areas. The lighting would be oriented so as to direct the beams into the site.

**Landscape Planting**

4.27 Owing to the topography of the land and existing vegetation along the Brington Road and the railway embankment there is considered to be no visual impact on the Special Landscape Area to the north of Brington Road and further east of the site. Views into the site would be restricted to those from the near vicinity from a short stretch of Brington Road, the public footpath and bridleway along the western boundary of the site, and glimpse views from trains as they pass the site along the railway bridge.

4.28 As it establishes, existing hedgerow planting would provide screening between the western boundary of the site and the public footpath. Similarly, there is established planting along the railway embankment to the south.

4.29 The application proposes to supplement the existing vegetation with a mix of trees and shrubs along the northern and eastern boundaries, so effectively creating a screen around the entire site. Glimpse views into the site would only be possible along a short stretch of the Brington Road at the gated access into the compound.
4.30 Application Plan P1/5021/4 Rev A (Appendix 2) shows the areas of proposed planting and the schedule provides details of the plant mix, programme of implementation, plant protection and maintenance during a five year after care period.

Ecology

4.31 Any potential for impacts on ecology arising from the proposed development was discussed during the pre-application site visit/meeting between Cemex and NCC officers. Given the agricultural use and lack of adjoining trees or established hedgerows present on the site, it was agreed that the potential for ecological interest would be limited and that no ecological assessments would be required to be submitted with the planning application. However, it was agreed that a precautionary badger survey be undertaken given the nature of the habitat at the boundaries of the site. The badger survey is included at Appendix 3. It concludes that the proposed development would be highly unlikely to impact on any badgers or local badger populations. Further detail is provided in the 'Policy Considerations’ section of this document.

Archaeology

4.32 No heritage designations or recorded assets coincide with the site. It lies between the road, railway and along the existing pipeline, all of which would probably have affected any preservation. As set out in paragraph 3.10 of this statement, the pipeline has been in operation since 1964 and field drains were installed in 1980. Since then, the land has been subject to some excavation on several occasions in connection with annual routine maintenance of the site, as described in paragraph 2.5, and also during re-laying of the pipeline in 2000. The potential for impacts arising from the proposed development was discussed during the pre-application site visit/meeting between Cemex and NCC officers, and the need for archaeological assessment was not stipulated by the officers.

Management of Flood Risk

4.33 The site is located within Flood Zone 3 on the Environment Agency Indicative Flood Map, which is defined as having an annual probability of fluvial flooding greater than 1 in 100 (>1%). The proposed development is classified as 'less vulnerable’ in the National Planning Policy Framework (NPPF). ‘Less vulnerable’ development is permitted within Flood Zone 3 subject to the submission of a suitable Flood Risk Assessment (FRA).

4.34 The flood risk to and from the completed site has been assessed and quantified and potential mitigation measures outlined. The FRA is included at Appendix 4.
4.35 The Environment Agency have indicated that new development in the Upper Nene catchment should be assessed against the 1 in 200 (0.5%) annual probability event including an allowance for climate change. This is above the standard required within the NPPF and designed to afford greater protection from flooding to Northampton.

Flood Risk to the Site

4.36 The site would be unmanned and welfare facilities would not be required, effectively limiting the number of structures vulnerable to flooding. The site access would be located in the northeast of the compound which is the area of the least flood risk. Given the proposed use of the site and with these mitigation measures in place to allow for the management of flood risks, the FRA concludes that overall flood risk associated with fluvial flooding would be ‘moderate’. The proximity of the application area to the Whilton Branch of the River Nene means that groundwater and fluvial flooding are likely to occur simultaneously and the overall risk of groundwater flooding in isolation is considered to be low.

4.37 The majority of surface water leaves the generally flat agricultural land via infiltration and owing to the topography there is very limited potential for surface water run-off to adversely affect the site. Overall flood risk from surface water flooding is considered to be very low.

4.38 Any risk of flooding from water mains or sewers would be negligible.

Flood Risk to Surrounding Area

4.39 The access would be located in the northeast of the compound in an area of least flood risk.
5.0 Planning Policy and Considerations

National Policy

5.1 The National Planning Policy Framework (NPPF) which sets out the Government's planning policies for England was published in March 2012. At the heart of the NPPF there is a presumption in favour of sustainable development.


5.3 The NPPF recognises the important contribution that minerals make in supporting sustainable economic growth and quality of life, and that a sufficient supply is required to provide the infrastructure, buildings, energy and goods that the country needs.

5.4 Paragraph 146 reflects the significant investment associated with establishment, maintenance and improvement of plant and equipment for the manufacture of cement by requiring a substantial landbank to ensure the ongoing and adequate supply of raw materials.

5.5 Paragraph 144 sets out that in granting planning permission for mineral development, there should be no unacceptable adverse impacts on the natural and historic environment and human health.

5.6 Technical guidance to the NPPF provides further advice relating to flood risk dust and noise. It makes clear that unavoidable dust and noise emissions should be controlled, mitigated or removed at source. In relation to the management of flood risk, the aim should be to direct development away from areas at highest risk, but where development is necessary, it should not increase flood risk elsewhere.

5.7 The NPPF does not change the statutory principle referred to above that determination of planning applications must be made in accordance with the adopted development plan unless material considerations indicate otherwise. The NPPF is one of those material considerations.
5.8 The adopted development plan documents are:
   - The Northamptonshire Minerals and Waste Development Framework (MWDF)
   - The Daventry District Local Plan

5.9 Some weight is also afforded to the emerging submission version of the Joint Core Strategy for
West Northamptonshire to which reference is also made.

5.10 Key policies of the adopted and emerging plan documents are considered below.

Northamptonshire MWDF

5.11 The Minerals and Waste Development Framework, or MWDF, is the adopted Minerals and Waste
Local Plan for Northamptonshire. The MWDF includes a number of Development Plan Documents
(DPDs) including the Core Strategy (May 2010) and Control and Management of Development DPD
(June 2011) which are considered most relevant to this planning application.

5.12 The proposed development would enable the continued, effective and sustainable transportation of
chalk slurry for the manufacture of cement, a product of vital importance to the construction
industry. It therefore accords with the relevant objectives and policies set out in the Core Strategy
to ensure a supply of minerals to the construction industry, and to promote their sustainable
transport.

5.13 **Objective 1** recognises the importance of the supply of minerals to the construction industry in
supporting the development of sustainable communities in the key national growth area of
Northamptonshire by facilitating the provision of infrastructure, facilities and services. **Objective 2**
seeks to ensure that the use of existing infrastructure is optimised and promotes the sustainable
transport of minerals.

5.14 **Core Strategy Policy CS9** requires minerals and waste related development to maximise the use
of sustainable or alternative transport modes.

5.15 The Core Strategy **Objectives 10 and 12** and associated policies go on to require high standards
of mitigation to be put in place to ensure that the environment and communities are adequately
protected from potential adverse impacts. **Core Strategy Policy CS14** requires that the following matters have been addressed:

"**minimising environmental impact and protecting Northamptonshires key environmental designations, protecting natural resources or ensuring that any unavoidable loss or reduction is mitigated, 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.**"

5.16 There are general development management policies which apply to all proposals for mineral development. These provide more detailed requirements relating to achieving where possible a net gain in assets and natural resources (**Policy CMD7**), protection of landscape character (**Policy CMD8**) and enhancement of Northamptonshire’s historic environment (**Policy CMD9**).

**Daventry District Local Plan**

5.17 The existing Daventry District Local Plan 1997 sets out the Council’s policies and proposals for guiding the development and use of land in the District. This would gradually be replaced by documents to be produced as part of the Local Development Framework (LDF). The following paragraphs refer to relevant ‘saved’ policies.

5.18 Proposals for future development would be considered in the light of criteria set out in **Policy GN1** which include safeguarding the natural resources of the District and protecting and enhancing the environment. **Policy GN2** provides further criteria which seek to ensure that new development is compatible with the Council’s aim of conserving and enhancing the environment of the District. These relate to: the type, scale and design of development; satisfactory means of access and sufficient parking facilities; and that there should be no adverse impact on the road network, areas of historic, ecological or landscape importance.

**Joint Core Strategy for West Northamptonshire**

5.19 A Joint Core Strategy (JCS) is currently being prepared. Following submission of the JCS to the Secretary of State, examination hearings were held in April/May 2013. Further work is to be undertaken by the Joint Planning Unit (JPU) before the hearings are expected to resume in October.
5.20 The overall aim of this JCS is to deliver sustainable development ensuring that the economic, social and environmental needs of the area are delivered in a balanced way. It seeks to ensure that the natural and local environment are protected, conserved and enhanced, valued landscapes protected, impacts on biodiversity minimised, and green networks enhanced. **Policy S10** sets out the key sustainability principles and these are elaborated upon through **Policies BN1, BN2, BN4, BN7, BN8** which cover green infrastructure connections, biodiversity, the historic environment, flood risk and the River Nene.

**Policy Considerations**

5.21 As set out in previous sections no national, regional or locally designated sites of ecological, historic or landscape importance or protected species would be affected by the proposed development.

5.22 As a precautionary measure, a badger survey was carried out on the 13th June 2012 by Bowland Ecology Ltd. The survey was undertaken across the site and within 30m of the site boundary to assess foraging areas, commuting routes and the status of any setts. The Advice Note prepared following the survey is included at Appendix 3 and provides information highlighting any potential ecological constraints and legal obligations in respect of badgers.

5.23 In summary, although the surrounding area provides potential habitat to support badgers, no evidence of badgers was recorded during the survey, and no setts were recorded on site or within 30m of the site boundary. Two large mammal runs were recorded leading from the embankment, both were overgrown and no evidence of badgers was recorded.

5.24 The survey concluded that that the proposal to use the field as a site compound is highly unlikely to impact any badgers or local badger populations, and that a licence would not be required.

5.25 The existing landscape character of the site is that of an agricultural landscape with hedgerows, small streams and stands of woodland and the existing green infrastructure would not be impacted upon. The proposal retains the existing hedgerows and provides for additional mixed planting along the boundaries and within the north-west corner of the site. The landscape planting would be in keeping with the existing woodland area to the west of the site and with the character of the wider

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Supporting Statement v2
A081776
15/07/2013
area. Whilst the proposed development includes low key industrial elements, this should be considered in the context of the adjacent substantial electricity compound.

5.26 The site would be well screened from Brington Road to the north of the site and the public footpath/bridleway along the western boundary minimising visual impact. Furthermore, there would be no adverse impact on residential properties, the nearest being a considerable distance away, or from noise or dust emissions.

5.27 The proposed development is permitted within Flood Zone 3 subject to an FRA which concludes that overall there would be no significant flood risk associated with the proposed development. The mitigation measures set out in the FRA are considered to be appropriate and would allow the flood risks to be managed. As there would be minimal structures proposed on site there is considered to be no potential for detrimental impact on floodplains storage.

5.28 The pipeline allows for the sustainable transportation of chalk slurry and the inspection and maintenance which would be afforded through the installation of the compound would enable this to continue effectively. Transport movements to and from the site would be minimal and access would largely be via Lodge Lane (from the A428 and B5385) so avoiding the residential area of Long Buckby. It would also be possible to access the site from the east along Brington Road via the A428 and Church Lane, so by-passing Great Brington.
6.0 Conclusion

6.1 This planning application is for the development of a secure compound consisting of a Pipeline Inspection Gauge launch station and associated lagoon, access and vehicle turning area. The development would ensure the necessary inspection and cleaning of the pipeline which transports chalk slurry from Cemex’s Kensworth Quarry in Dunstable to the company’s cement works in Rugby, Warwickshire. The sustainable transportation via pipeline is critical to the ongoing supply of raw material for the manufacture of cement. The installation of a permanent launch and receive facility for inspection tools would ensure the effective and safe operation of the pipeline without the need for disruptive annual temporary excavation and maintenance works that are presently required, and to avoid environmental implications and costs associated with the need to re-lay the pipeline.

6.2 In keeping with national policy the proposal would contribute to sustainable economic growth which is heavily reliant on the provision of construction materials. Rugby Cement works has required substantial investment and is dependent on a significant landbank of raw materials to ensure adequate supply of raw materials. Improvements to the pipeline would ensure that there is an ongoing and efficient supply. The proposal incorporates appropriate mitigation where necessary and, as set out in previous sections of this statement, can be implemented without adverse impact on the environment or local communities. The additional proposed planting would make a positive contribution to the landscape character of the area, green networks and, potentially, to biodiversity.

6.3 The proposal complies with national policy and the adopted Northamptonshire MWDF, Daventry District Local Plan and is in line with the emerging Joint Core Strategy for West Northamptonshire. In conclusion, it is in accordance with the adopted Development Plan, and therefore planning permission should be granted.
Appendices
Appendix 1 – Planning Application Forms & Certificates
Appendix 2 – Application Plans
Appendix 3 – Badger Survey, Advice Note prepared by Bowland Ecology Ltd (July 2012)
Appendix 4 – Flood Risk Assessment, prepared by Hafren Water (March 2013)
Appendix 5 – Essential requirements for a suitable site for cleaning activities and summary analysis of alternative sites considered
Appendix 6 – Lighting Design and DiaLux Calculations
Appendix 5: Essential requirements for a suitable site for cleaning activities and summary analysis of alternative sites considered

Selection of a Suitable Site
Selection of a suitable site for cleaning activities is determined by a number of essential and practical requirements:

The site must:

• Be on the route of the pipeline to enable connection of the launching and receiving equipment;
• Have good road access;
• Be level;
• Be unimpeded by other buried services such as water or gas mains; and
• Be reasonably distant from the cleaning site at Brogborough, Bedfordshire, and the end of the line at the Rugby Cement Works, Warwickshire.

Also:

• The landowner must be willing to sell the site on acceptable terms to CEMEX; and
• The line depth must be relatively shallow to make it readily accessible.

A number of other factors are considered important in identifying a suitable site for cleaning activities including:

• Remoteness from human habitation to minimise disturbance and potential for vandalism;
• Features providing screening to reduce visual impact; and
• Avoidance of ecologically and/or archaeologically sensitive areas.

Sites Considered
It was considered that a site to the north of the Northampton conurbation would be required in order to provide a reasonable 'split' in the lengths of sections of pipeline, and to avoid the Salcey Forest area.

Swan Valley Development
A small area of land within this development was identified as being potentially suitable but was rejected on the basis of flood risk.
Kislingbury
A site on the Kislingbury to Rothersthorpe road has been used in the recent past on a temporary basis for cleaning activities, however it was prominent on the top of a rise near the M1 and attracted some complaints from local residents. This site was therefore rejected on the basis of unacceptable visual impact.

A45 Road Crossing
Fields to the north and south of this trunk road were considered unsuitable as the line is horizontally directionally drilled in this area and is buried deep to pass under the road and the adjacent gas installation.

Brington Area
Sites in this area with good road access were rejected on the basis of proximity to human habitation.

Great Brington to Whilton Road
A potential site to the south of this road was identified, however the presence of other buried services, in particular water mains and also a relatively narrow winding access road precluded an installation at this location.

South of Patford Bridge (access via bridleway)
Landowners were unwilling to sell a plot of land in this location.

North of Patford Bridge
See supporting statement.

Patford Bridge to Long Buckby Road
This site was considered suitable but was not pursued to a conclusion as the site was visible from houses on the Long Buckby to A428 road and the landowner was not willing to sell.

Long Buckby to A428 Road Crossing
The line is horizontally directionally drilled at this location to pass under the road and an adjacent gas installation and is buried to deep to access easily.

Long Buckby and Locations North.
No further sites northwards were considered as this was felt to be too close to Rugby and would provide an excessively long section of line towards the cleaning station to be developed at Brogborough, Bedfordshire.
Bowland Ecology Ltd was commissioned by Cemex UK Cement Ltd. to undertake a badger survey of land at Patford Bridge, near Long Buckby, Northamptonshire (NGR; SP 646 663). This advice note provides information highlighting any potential ecological constraints and legal obligations in respect of badgers in relation to using the area as a site compound.

The survey of the site was undertaken on the 13th June 2012 by James Segar MSc, BSc (Hons), AIEEM. The badger survey was undertaken across the site and within 30 m of the site boundary to assess foraging areas, commuting routes and the status of any setts.

The survey area was surveyed for signs of badger and badger activity including:

- Setts and bedding trails.
- Latrines.
- Footprints in soil and mud.
- Paths and excavation.
- Scratching posts.
- Hairs caught in fences.
- Bedding and ‘guard hairs’ at sett entrances.
- Snuffle holes and evidence of foraging.

The weather during the survey was overcast with a temperature of approximately 16°C. Badgers are mobile animals and the absence of evidence of this particular species should not be taken as conclusive proof that the species will not be present in the future. However, the timing of the survey was within the optimum period for completing such a survey, the conditions were suitable and the whole of the site was accessible. As a result, a comprehensive and valid assessment of the habitats present and their potential to support badgers was undertaken.

A badger survey plan is shown in appendix 1 of this report. Target notes are included in appendix 2.

Site Description

The site is within an arable landscape with a network of hedgerows, small streams and a number of small stands of woodland. The site is generally flat and comprises an arable field, at the time of survey planted with rapeseed (*Brassica napus*). The site is bordered by an access track with a newly planted species poor hedgerow to the west, a scrub dominated railway embankment to the south and an improved grassland strip and a road to the north. To the east of the site the arable field continues in a strip between the railway embankment and the road. To the west of the site is an area of deciduous woodland with a small stream running through it.

The hedgerow along the west of the site is immature, gappy and dominated by hawthorn (*Crataegus monogyna*). The railway embankment is dominated by dense scrub with
semi-mature and mature trees present. Species include hawthorn, bramble (*Rubus fruticosus* agg.), elder (*Sambucus nigra*), oak (*Quercus* sp.), ash (*Fraxinus excelsior*) and lime (*Tilia* sp.). The railway embankment is approximately 5-10 m high with a substrate composed of gravel and clinkers.

During the survey the ground was wet and areas of mud were present, along the edges of the field and along an access track adjacent to the eastern boundary of the site, providing the ideal conditions to observe any footprints.

**Badger Survey Results**

There was significant evidence of rabbit along the railway embankment and within the site boundary. Although the surrounding area provides potential habitat to support badgers, no evidence of badgers was recorded during the survey. No setts were recorded on site or within 30 m of the site boundary.

Two large mammal runs were recorded leading from the embankment, one into the crops and the other along the edge of the field. No evidence of badgers was recorded, and both runs were overgrown with rank grassland species such as cock's foot (*Dactylis glomerata*), perennial rye grass (*Lolium perenne*) and Yorkshire fog (*Holcus lanatus*). In addition significant evidence of rabbits was recorded on the embankment and along the large mammal runs.

It is considered that the proposals to use the field as a site compound are highly unlikely to impact any badgers or local badger populations. Therefore, a licence will not be required.

**Prepared by:**

James Segar MSc, BSc (Hons), AIEEM.  
**Ecologist**  
06/07/2012
Appendix 1: Badger Survey Plan

BOW17.412
Patford Bridge

Drawing Title: Badger Plan
## Appendix 2: Target Notes

<table>
<thead>
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<th>TN</th>
<th>Description</th>
<th>Photograph</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>A dirt track is present along the western boundary of the site. At the time of the survey the track was wet and muddy providing a highly suitable area for footprints. No badger footprints were recorded.</td>
<td><img src="image1.jpg" alt="Image" /></td>
</tr>
<tr>
<td>2</td>
<td>An area of open woodland between the track at TN1 and a stream to the west. The understorey is limited to rank grassland and tall ruderal species. No evidence of badger was recorded within the woodland.</td>
<td><img src="image2.jpg" alt="Image" /></td>
</tr>
<tr>
<td>3</td>
<td>Significant evidence of rabbit diggings on the embankment adjacent to the concrete steps leading to the railway line. No evidence of badger was recorded.</td>
<td><img src="image3.jpg" alt="Image" /></td>
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The railway embankment is approximately 5-10m high with a substrate composed of gravel and clinkers. It is dominated by dense scrub with semi-mature and mature trees present. Species include hawthorn, bramble (*Rubus fruticosus* agg.), elder (*Sambucus nigra*), oak (*Quercus* sp.), ash (*Fraxinus excelsior*) and lime (*Tilia* sp.). Significant evidence of rabbit is present along the embankment.

No evidence of badger was recorded.

A large mammal run is present, leading from the embankment into the arable field. A number of rabbit footprints and droppings were present.

No evidence of badger was recorded.

A large mammal run is present, leading from the embankment. The run follows the edge of the field and does not lead into the crops. Tall, rank grass covered the run, making it of limited size.

No evidence of badger was recorded.
<table>
<thead>
<tr>
<th>7</th>
<th>The northern boundary of the site, bordering the road. No evidence of badger was recorded.</th>
</tr>
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</table>

![Image of a field with green vegetation and a cloudy sky.](image_url)
Thorn 96262342 OLSYS1 45W LED CL1 4000K A/S [STD] / Luminaire Data Sheet

Luminous emittance:

Luminaire classification according to CIE: 100
CIE flux code: 56 90 100 96 100


Due to missing symmetry properties, no UGR table can be displayed for this luminaire.

Components:

*2 x

Dimensions: 330 x 225 x 59 mm
Total power: 46.5 W
Weight: 2.8 kg
Scc: 0.07 m²
Exterior Scene 1 / Planning data

Maintenance factor: 0.80, ULR (Upward Light Ratio): 4.5%

Scale 1:544

Luminaire Parts List

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<th>Pieces</th>
<th>Designation (Correction Factor)</th>
<th>Φ (Luminaire) [lm]</th>
<th>Φ (Lamps) [lm]</th>
<th>P [W]</th>
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<tbody>
<tr>
<td>1</td>
<td>15</td>
<td>Thorn 96262342 OLSYS1 45W LED CL1 4000K A/S [STD] (1.000)</td>
<td>3579</td>
<td>3583</td>
<td>46.5</td>
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</table>

Total: 53691  Total: 53745  697.5
15 Pieces  Thorn 96262342 OLSYS1 45W LED CL1  
4000K A/S [STD]  
Article No.: 96262342  
Luminous flux (Luminaire): 3579 lm  
Luminous flux (Lamps): 3583 lm  
Luminaire Wattage: 46.5 W  
Luminaire classification according to CIE: 100  
CIE flux code: 56 90 100 96 100  
Fitting: 1 x LED 45 W (Correction Factor 1.000).
Exterior Scene 1 / 3D Rendering