



## Northamptonshire County Council

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Please ask for: Mark Laurenson  
Tel: (01604) 367197  
Our ref: 12/00001/SCO  
Your ref: CAM.0762  
Date: 4<sup>th</sup> April 2012

Dear Robert,

### **TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 2011: REGULATION 13 SCOPING OPINION**

#### **12/00001/SCO – Proposals for Scope and Content of an Application for Planning Permission for an Energy from Waste Plant at Magnetic Park, Desborough, Northamptonshire**

I refer to your letter dated 9<sup>th</sup> February 2012 and the accompanying scoping report. The scoping report has been the subject of consultation in accordance with the Environmental Impact Assessment (EIA) Regulations and copies of the responses received have previously been forwarded to you. In the last week responses have been received from Kettering Borough Council (KBC) and a neighbouring business and these responses are attached for your information.

Unfortunately, due to an administrative error, this consultation was not sent to the Environment Agency (EA). The scoping report and a copy of this opinion will be sent to the EA as a matter of urgency with any comments received to be passed onto you in due course. The EA's input is particularly important regarding flood risk, environmental permitting and other related regulation.

Overall I can confirm that the approach that you are advocating and the topics you address in the scoping report are considered to be acceptable and appropriate and this is reflected in the nature of the consultation responses. To avoid unnecessary repetition, broad guidance provided by consultees has not been duplicated in this letter. You will note the specific points which have been made in the responses and you are required to have regard to these. In particular I would draw your attention to the following:

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Northamptonshire  
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## **Development Plan/Policy**

Full consideration should be given to the National Planning Policy Framework and related technical guidance. In addition it is noted that the Northamptonshire Minerals and Waste Development Framework (MWDF) is fully adopted and provides the relevant county level strategic guidance and policy. The Northamptonshire Structure Plan has been superseded.

In assessing the proposals against the MWDF, detailed information should be provided to illustrate the likely types and sources for waste inputs and type and destination for any waste outputs. The assessment of waste inputs shall be made in the context of the established catchment area policy established in the MWDF.

## **Amenity Impacts**

### *Odour and Noise*

Odour and noise are considered likely to be the most significant amenity issues to mitigate under these proposals. It is acknowledged that odour and noise control measures are proposed but the Environmental Statement (ES) would need to demonstrate that no amenity impacts resulting from odour or noise would arise as a result of these proposals. It is suggested that noise and odour management plans are submitted at the application stage to help address these issues up front.

### *Air Quality*

The proposals have the potential to impact on air quality and on that basis the Environmental Statement would be expected to include an up-to-date air quality assessment. In addition the gasification plant process would be covered by the Environmental Permitting Regulations. The Environmental Permit process would address air emissions and ensure that they were in line with the values given in the Waste Incineration Directive.

Natural England has commented on the importance of the assessment of potential air quality impacts on surrounding designated sites, including consideration of impacts from both increased atmospheric concentrations and deposition of pollutants. Natural England drew particular attention to nitrogen deposition at Stoke and Bowd Lane Woods Site of Special Scientific Interest (SSSI) which they state are already well above critical load.

### *Lighting*

Information should be submitted to address amenity impacts from lighting and should be extended to include potential impacts on ecology.

### *Key Receptors*

Assessment of amenity impacts should be made having regard to key receptors. These receptors should include existing and proposed residential development as well as neighbouring industrial operations. In particular it is noted that Great Bear Distribution immediately to the east of the site is used for the storage and distribution of food products

and should be considered a sensitive receptor regarding odour and air quality (including dust and human health).

### **Landscape and Visual Impact Assessment and Cultural Assessment**

Potential visual impacts have been raised in a number of responses. The Waste Planning Authority (WPA) welcomes proposals to increase the radius for landscape and visual assessment to 5 kilometres (km) rather than 2 km. English Heritage has suggested that consideration be given to a practical exercise to demonstrate the visual impacts of the proposals. This could involve the raising of a balloon or erection of a crane to the maximum height of the exhaust stack to allow parties to better understand the likely visual impacts of the proposals.

English Heritage has commented that the scoping report does not recognise heritage assets as receptors regarding landscape impacts. Consideration should be given to potential these impacts and should also extend to potential influences on the public's perception, understanding and appreciation of heritage sites.

The County Archaeological Advisor notes the proposals to produce a desk based assessment and on this basis assumes that the document would demonstrate that the site has a low archaeological potential and that no further investigation would be required as part of the EIA.

### **Transport and Highways**

A transport assessment would be expected with the ES. The Highway Authority has asked that the assessment include first principles trip generation to show the likely number and type of vehicles that would be required to deliver waste materials to and from the site.

Traffic routing has been the subject of comment and the WPA welcomes the proposals for a routing agreement. The routing agreement would need to be secured through a Section 106 agreement.

Detail regarding any proposed highway works, including works relating to footpaths or cycleways, would be expected to accompany the ES.

### **Water Resources**

Given the location (Flood Zone 1) and the size of the site (greater than 1.0 hectare) the Environmental Statement would need to consider all sources of flooding and provide a Flood Risk Assessment.

### **Biodiversity and Green Infrastructure**

Comments regarding biodiversity, landscape and green infrastructure have been made by the Senior Environmental Planner at Northamptonshire County Council, the Wildlife Trust and Natural England. These responses do not raise any major issues with the proposed

scope of the ES but do provide useful comment and advice. Please refer to these comments directly.

Particular attention is drawn to the need to assess local data and to seek overall net gains in terms of biodiversity. The points made by the Wildlife Trust regarding the potential biodiversity value of the brownfield site should be taken into consideration as should the potential for green infrastructure enhancement.

### **Environmental Baseline**

The response from KBC notes the importance of baseline data and an analysis of the impacts of the whole lifecycle of the project, including consideration against the do nothing option.

### **Cumulative Impacts**

It is considered important that the assessment addresses cumulative impacts on amenity, landscape, biodiversity and highways matters. This should relate to both impacts generated from the subject site and in conjunction with surrounding developments.

### **Other matters**

It would be helpful for all parties if the ES gave consideration to proposed planning conditions and the content of any Section 106 agreement.

If the opportunity arose it could be beneficial if elected members were able to visit a similar facility that is operational in advance of an application being submitted.

### *Planning Statement*

In light of recent issues in the county, fire safety is of significant concern to the community. It would be of benefit if the application included detail of the measures proposed to minimise fire risk.

Desborough Town Council has requested information explaining the likely benefits to the local community of the proposed combined heat and power operation. In addition the town council has asked for an explanation of the likely wider affects of the proposal on Desborough, including potential community contributions. It is recommended that this information is included in the planning statement that would accompany the application.

Please contact me if I can be of any further assistance.

Yours sincerely



Mark Laurensen  
Principal Development Control Officer