

MILTON MALSOR PARISH COUNCIL

Website: www.miltonmalsorparishcouncil.org.uk

All correspondence to the Clerk, Mrs. Ann Addison
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1st October 2008

Mrs Katherine Kerswell
Chief Executive
Northamptonshire County Council
PO Box 93
County Hall
Northampton,
NN1 1AN.

Dear Mrs Kerswell,

Re: Northamptonshire County Council Minerals Plan - Allocated site in Milton Malsor Parish for potential soft sand extraction

We refer to your letter of 10th July in response to our letter dated 29th June 2008 relating to the above subject matter.

Having considered your letter, members of the Parish Council remain very concerned with the County Council's position on the above allocated site, and therefore, seek your Council's explanation of the following:

1) In our letter of 29th June 2008, we referred to the County Council's letter of 15th October 2007 reference MWDF 8/1, enclosing the Council's Preferred Options for the Core Strategy & Locations for Minerals & Waste Development - in this publication your Council states:

a) "The Issues & Options consultation responses received, indicated overall support for the MA4: Collingtree (I&O Site 4) located in the Parish of Milton Malsor (83%) with only (5%) objecting to the site and 12% expressing no opinion".

Parish. However the County Council makes no reference in their Preferred Options to the following facts already in their possession:

b) The list of objections/supports received in the First Deposit Draft relating to the site, issued by the County Council on 2nd November 2004. From a total of 178 responses listed 176 objected (99%) to the site while only 2 were in support (1%) of the site.

*c) The Inspector's report issued by the County Council in October 2005 reference M6d. Published in this report under Appendix F.3 – List of Objections, are the names of over 170 individuals/organisations objecting to the site. **No names are published in this report of anyone in support of the site.***

Members **strongly object to the County Council's inference there is overall support** for the allocated site in the Parish as it is **entirely misleading**. Therefore, the Parish Council requires an explanation as to **why the County Council failed to mention** the above facts in the Preferred Options when it should have done so.

2) It states on page 97 in the County Council's Preferred Options:

a) *"19% support and 81% object to the Stoke Albany East site".*

This statement clearly infers there is a majority objecting to the site in Stoke Albany East, whilst no reference was made by the County Council in their Preferred Options to the following fact already in their possession:

b) *It states on page 4-52 in the Inspectors report issued by the County Council in October 2005 reference MRd, under appendix F.3 – List of Objections, there are two objections to the Stoke Albany East site, with no names published in his report of anyone in support.*

Members **strongly object to the County Council's inference there is a majority objecting** to the Stoke Albany East site as it is **entirely misleading**. Again, the Parish Council requires an explanation as to **why the County Council failed to mention** the above fact in the Preferred Options when it should have done so.

3) In your letter of 10th July you refer to the assessment of potential sites for extraction carried out in Milton Malsor Parish and the two sites in Stoke Albany Parish. It states in your letter:

This assessment led to the conclusion that the site in Milton Malsor parish was an acceptable site for inclusion (and thus backing up its conclusion in the currently adopted Minerals Local Plan), whilst there were issues over the appropriateness of including the sites in Stoke Albany parish.

The Parish Council has studied the content of the assessments carried out by the County Council on the potential sites in Milton Malsor parish and the two sites in Stoke Albany parish.

It states in the County Council's assessment of the Stoke Albany East site:

- a) ***This site is identified*** as a site for "Further Consideration" under the Minerals Local plan, and so has been assessed as a potential location for minerals development.
- b) ***Economic benefit of minerals development justification:*** "the increase in the reserves of good quality soft sand will ensure that an additional source of good quality sand is available within the county".
- c) ***Air emissions (including dust) justification:*** "the site is located in a predominantly rural area which reduces potential for dust nuisance".
- d) ***Noise and vibration justification:*** "surrounding land use is predominantly rural hence noise and vibration from onsite plant and heavy vehicles would not be an issue for residential amenity in villages
- e) ***Nature conservation justification:*** "there are no designated wildlife"
- f) ***Extent to which potentially adverse impacts could be mitigated justification:*** "rural location reduces potential impacts on surrounding villages"
- g) ***Sufficient area to accommodate proposed development justification:*** "it is anticipated opportunities to work adjacent sites in conjunction/phased with this site to reduce infrastructure impacts and requirements".
- h) ***Compatibility of adjacent land use justification:*** "acceptable – the site is located away from villages and sensitive receptors".
- i) ***Impact on infrastructure network particularly related development justification:*** "there does not appear to be a significant impact upon the infrastructure network - the site is not near any village or town so is not impacted upon by future urban growth considerations".

j) **Strategic location justification:** *“located close to Corby hence minerals could be used within the County to serve growth areas, or exported sub-regionally to Market Harborough”*

k) Opportunities for the site - overall evaluation:

“Rural location away from villages decrease potential impacts on residential amenity and safety”

“Potential contribution towards sand & gravel aggregate apportionments & landbank”

“Location could serve development areas at Corby & sub-regionally to Market Harborough”

“Mitigation measures are likely to reduce impacts on Lower Lodge Farm to acceptable levels”

“Limited potential for impact on water resources, air, nature conservation, historic environment & recreational opportunities”

“Restoration could improve nature conservation & recreational opportunities”

l) Constraints for the site - overall evaluation:

“Limited site specific geological evidence to support quality of reserve & intended end use - reserve is of unknown bearing”

“Disruption to landscape character & general amenity”

“Potential adverse impacts & environmental nuisance on Lower Lodge Farm & adjacent ROW (however it is anticipated that these should be able to be adequately mitigated/avoided)”

The Parish Council refers to table 3 **“sites not to be taken forward through the plan”** on page 97 in the Preferred Options where the Stoke Albany East site is included. The reasons quoted for not taking the “site forward” include the **“potential presence of badgers & otters”**. The Parish Council requires an explanation why the County Council made this statement in view of the fact, the site assessment states **“there is no designated wildlife”**.

There are compelling reasons published in the County Council’s site assessment for the Stoke Albany East site to be **“taken forward”** and included as an allocated site under the Minerals Local Plan. The Parish Council requires an explanation as to **why the County Council has not** “taken forward” the site in the Preferred Options when it should have done so. The Parish Council would also like to receive an explanation why the County Council are saying **“the reserve is of unknown bearing”** - has the County Council evaluated the potential for soft sand? If so, the Parish Council would like to receive a copy of these results.

If not why not, since the Stoke Albany West site is adjacent and already proven.

4) It states in the County Council’s assessment of the Stoke Albany West site:

a) **This site is identified** as a site for “Further Consideration” under the Minerals Local plan, and so has been assessed as a potential location for minerals development.

b) **Economic benefit of minerals development justification:** *“the increase in the reserves of good quality soft sand will ensure that an additional source of good quality sand is available within the county”*

c) **Air emissions (including dust) justification:** *“Stoke Albany & Wilbarston to the south east, increases potential for dust nuisance - dust is able to be effectively controlled through good site operational management”*

- d) **Noise and vibration justification:** “surrounding land use is predominantly rural hence noise and vibration from onsite plant and heavy vehicles is unlikely to be an issue for residential amenity in villages”
- e) **Nature conservation justification:** “there are no designated wildlife sites in this general area”
- f) **Extent to which potentially adverse impacts could be mitigated justification:** “rural location reduces potential impacts on surrounding villages”
- g) **Sufficient area to accommodate proposed development justification:** “it is anticipated that the site will be of a suitable size to accommodate the proposed operations”
- h) **Compatibility of adjacent land use justification:** “acceptable - the site is located away from villages with only one dwelling in close proximity”
- i) **Impact on infrastructure network particularly related development justification:** “high voltage power lines intersect the site from north west to south east - the site appears to contain one of the supporting pylons - this may need to be realigned, or worked around”
- j) **Strategic location justification:** “located close to western Corby hence likely that minerals would be used within the County to serve growth areas, or exported sub-regionally to Market Harborough”

k) Opportunities for the site - overall evaluation:

“Significant contribution towards soft sand aggregate apportionment”

“Rural location away from villages decrease potential impacts on residential amenity & safety”

“Mitigation measures are likely to reduce impacts on Lower Lodge Farm to acceptable levels”

“Limited potential for impact on water resources, air, nature conservation, historic environment & recreational opportunities”

“Location would serve growth areas of western Corby & sub-regionally to Market Harborough”

“Restoration could improve / extend nature conservation & recreational opportunities”

l) Constraints for the site - overall evaluation:

“Limited site specific geological evidence to support quality of reserve & intended end use”

“Proposal will require diversion / avoidance of high voltage power lines which intersects the site”

“Potentially significant disturbance to landscape character”

“Potential adverse impacts & environmental nuisance on Lower Lodge Farm (however it is anticipated these should be able to be adequately mitigated / avoided)”

The Parish Council refers to table 3 “**sites not to be taken forward through the plan**” on page 97 in the Preferred Options where the Stoke Albany West site is included. The reasons quoted for not taking the “site forward” include “**concerns regarding nuisance impacts on surrounding recreational opportunities (golf course & pathways)**”. The Parish Council requires an explanation why the County Council made this statement as **no mention is made of this in the site assessment.**

There are compelling reasons as published in the County Council's site assessment for the Stoke Albany West site to be "**taken forward**" and included as an allocated site under the Minerals Local Plan. The Parish Council requires an explanation as to **why the County Council has not** "taken forward" the site in the Preferred Options when it should have done so. The Parish Council would also like to receive an explanation why the County Council are saying there is "limited site specific geological evidence to support quality of reserve & intended end of use" - has the County Council evaluated the quality of soft sand? If so, the Parish Council would like to receive a copy of these results.

5) It states in the County Council's assessment of the site in Milton Malsor Parish :

- a) ***This site is identified*** as an allocated site under the Minerals Local plan however has not yet been granted permission, and so has been assessed as a potential location for minerals development.
- b) ***Economic benefit of minerals development justification:*** "the economic benefit of the operation at Collingtree (adjacent Milton Malsor) is the availability of additional sand resources for use in the County, particularly to new development in Northampton"
- c) ***Air emissions (including dust) justification:*** "potential for fugitive dust from site operations - residential dwellings located within close proximity to east & west (Collingtree & Milton Malsor) - the site is separated by the M1 from Collingtree & a railway from Milton Malsor - however the close proximity may increase potential for dust nuisance"
- d) ***Noise and vibration justification:*** "the cumulative impact of the proposal & existing M1 noise would need to be assessed in terms of ambient noise & residential amenity - the villages of Milton Malsor & Collingtree are both within approx 200m of the site"
- e) ***Nature conservation justification:*** "adjacent to M1 & Northampton rail link which causes interruption of potential wildlife corridors"
- f) ***Historic environment & built heritage justification:*** "potential impact on setting of Milton Malsor historic settlement core & historic buildings (conservation area listed buildings) 300m west of the site"
- g) ***Environmental nuisance justification:*** "although mitigation may be possible, environmental nuisance regarding dust & noise is likely to affect surrounding dwellings"
- h) ***Conflicts with non-industrial traffic on access routes justification:*** "the site is located close to villages - concern over the movement of traffic from the site through Milton Malsor & Collingtree"
- i) ***Compatibility of adjacent land use justification:*** "likely to produce land use conflicts even with transport infrastructure separating the site from both villages"
- j) ***Sufficient area to accommodate proposed development justification:*** "it is anticipated that the site is of a suitable size to effectively undertake the subject operation"
- k) ***Impact on infrastructure network particularly related development justification:*** "predominately related to transport infrastructure network, however dewatering has potential to impact adjacent rail & motorway embankments - onsite measures should mitigate this"
- l) ***Strategic location justification:*** "located close to the town of Northampton hence likely that minerals would be used within the county"
- m) ***Opportunities for the site - overall evaluation:***

"Significant contribution to soft sand apportionments (47%) & the Plans landbank"

“Restoration provides opportunity to increase nature conservation & recreational opportunities associated with the site”

n) Constraints for the site - overall evaluation:

“Potential adverse impacts & nuisance affecting residential amenity (noise & dust) particularly eastern edge of Milton Malsor”

“Cumulative impact (noise) from M1, railway & proposal on residential amenity of surrounding dwellings”

“Transport routing & access arrangements may result in transport conflicts & impact on infrastructure (upgrading required)”

“Potential dewatering impact on adjacent rail & motorway embankments, however it is thought that these effects are able to be mitigated”

It states in the County Council's site assessment, that the site in our parish, is located within approximately 200m of the villages in Collingtree & Milton Malsor, with residential dwellings also located within close proximity of the site. **This will impact severely on residents' amenity value and quality of life. This is a serious issue. For these reasons alone, it is not appropriate to allocate the site in our parish for sand extraction.**

As supported in your site assessments there are more viable options open to you, the and furthermore, the constraints listed for both sites are less onerous than at the site in Milton Malsor parish which will be very difficult to access. The Parish Council requires an explanation why the County Council is allocating the only site in the County for sand extraction so close to residential amenities in Collingtree and Milton Malsor, when there are other sites which have better access and will not impact on people's livelihoods.

6) The Parish Council has also studied the site assessment carried out by the County Council on Site 3 the Bozeat extension (North & East). It is noted this extension overlaps with Site 19 the Bozeat Northern extension which, is currently being worked for glacial sand and gravel. The proposed use for Site 3 the (North & East) extension includes the extraction of soft sand. It is not clear on pages 112/113 in the Preferred Options whether Site 3 the (North & East)

extension has been carried forward as a potential site for soft sand extraction. **Members would be grateful to receive the County Council's clarification on this specific point.**

In conclusion, the Parish Council considers its residents are not being well served by the County Council with regards to the Minerals Plan. It is apparent your Council is determined to responsibility and a duty of care to look after the livelihoods of residents. In this instance it is failing to do so. Members also consider your Council is being economic with the facts in a desperate attempt to retain the allocated site in our parish for sand extraction. As the technical assessments demonstrate other sites are viable and will not affect any residents (for 10 years); **why are they not being allocated in preference to the one between Milton Malsor and Collingtree?**

The Parish Council requests your written response to the points made in this letter within the next 14 working days.

Yours sincerely,

Clerk to the Council

Copies to: Councillor Mrs Ann Addison - South Northants Council Ward Member
Mr Brian Binley MP
Mr Malcolm Brice - Chairman Collingtree Parish Council
Councillor Mrs Janet Eliot - South Northants Council Ward Member
Councillor Bernard Ingram - Northants County Council Ward Member
Councillor Mrs Sally Townsend - Chairman Mid Northants Parishes Group

