COLLYWESTON PARISH COUNCIL

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Monday, 07 September 2020

Our ref: 20/Planning/11

Your ref: WS010005_000008_200702

The Planning Inspectorate Major Casework Directorate Temple Quay House 2 The Square Bristol BS1 6PN

To Whom It May Concern:

Re: Application by Augean South Limited (the Applicant) for an Order granting Development Consent for the Proposed East Northants Resource Management Facility Western Extension (the Proposed Development)

1. Land use

- (a) NPPF: The National Planning Policy Framework states: "The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land..." The following subheadings require to be included in the Environmental Impact Statement:
- **(b) Surrounding habitats:** The Scoping Report mentions badgers, bats, dormice, newts and toads in the surrounding habitats. The proposed extension would be considerably closer to these habitats, including important local SSSI and woodlands. These surrounding habitats should be protected from any further fragmentation by development.
- (c) Loss of agricultural land: The proposal to almost-double the overall footprint of the site will result in the loss to agriculture of 26.3 hectares. In the future it will only become more important to the nation to grow as much food domestically as possible; the fact that any remediation will only address biodiversity but never restore the land to possible food production does not seem to be an "acceptable" outcome.
- (d) Land to the South West: It is unclear on what it was decided not to carry out Noise Assessment to the South West of the site. Noise impact may not be anticipated to affect *people* in this area, but it has just the same impact on wildlife here as in all of the surrounding areas.

2. Quantification

(a) Capacity implications: The proposed footprint would expand from 31.2ha to 57.5ha, an increase of more than 80%. The Report anticipates an increase in the rate of waste input and HGV movements, rather than merely continuing the current rate of operations for an additional 20 years. This being so, a capacity

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assessment for the road junctions with the A47 would appear essential in terms of public safety and implications for infrastructure and emergency services implications.

- **(b) Gaseous emissions:** There should be none, arising from the Inert Waste and LLW permitted for disposal on site. Assuming that the increased rate of input will mean that a normally-small proportion of gases would grow proportionally, then the quantities should be disclosed and assessed so that future monitoring is meaningful.
- 3. Major accidents: The definition needs to be broadened beyond those caused on site by natural disasters or climate change. Increased operational activity on an extended site, surrounded by natural habitats, some neighbouring residents and business, served by the A47 and associated feeder routes such as the A1 and A43, mean that any "major accidents" would have potential for major impacts far beyond the operational site itself. This includes road accidents involving HGVs, transporting LLW and other hazardous substances over long distances. Any road diversions cause on-costs for Police, emergency services, and potentially Highways for emergency road repairs. Local residents deserve to know that, should the worst happen, they and the wider public would be safeguarded, and how. The public and local authority purses are very tightly constrained now, and this assessment needs to be made and the findings addressed.

Yours sincerely Clerk/RFO to the Parish Council

Mrs J. Hemingway