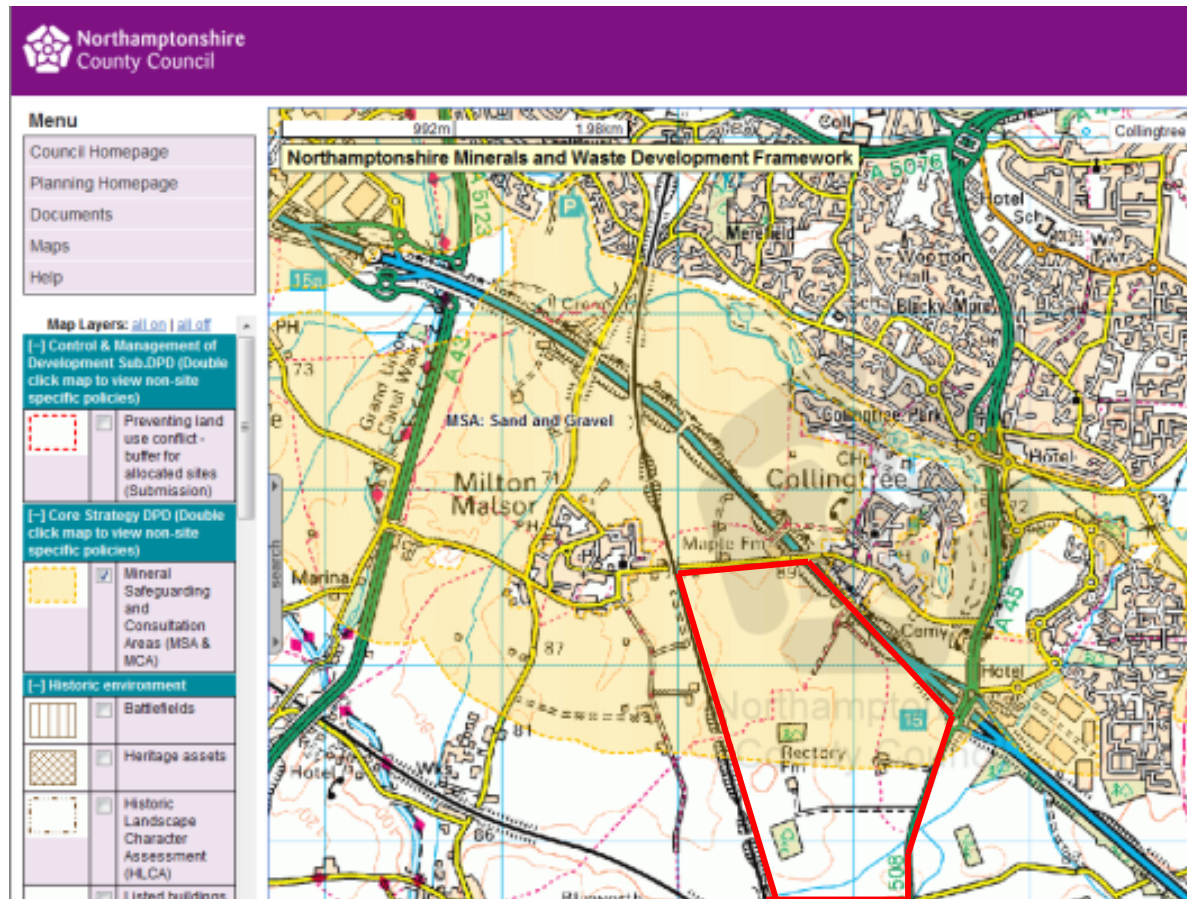


## Northamptonshire CC – Interactive Viewer

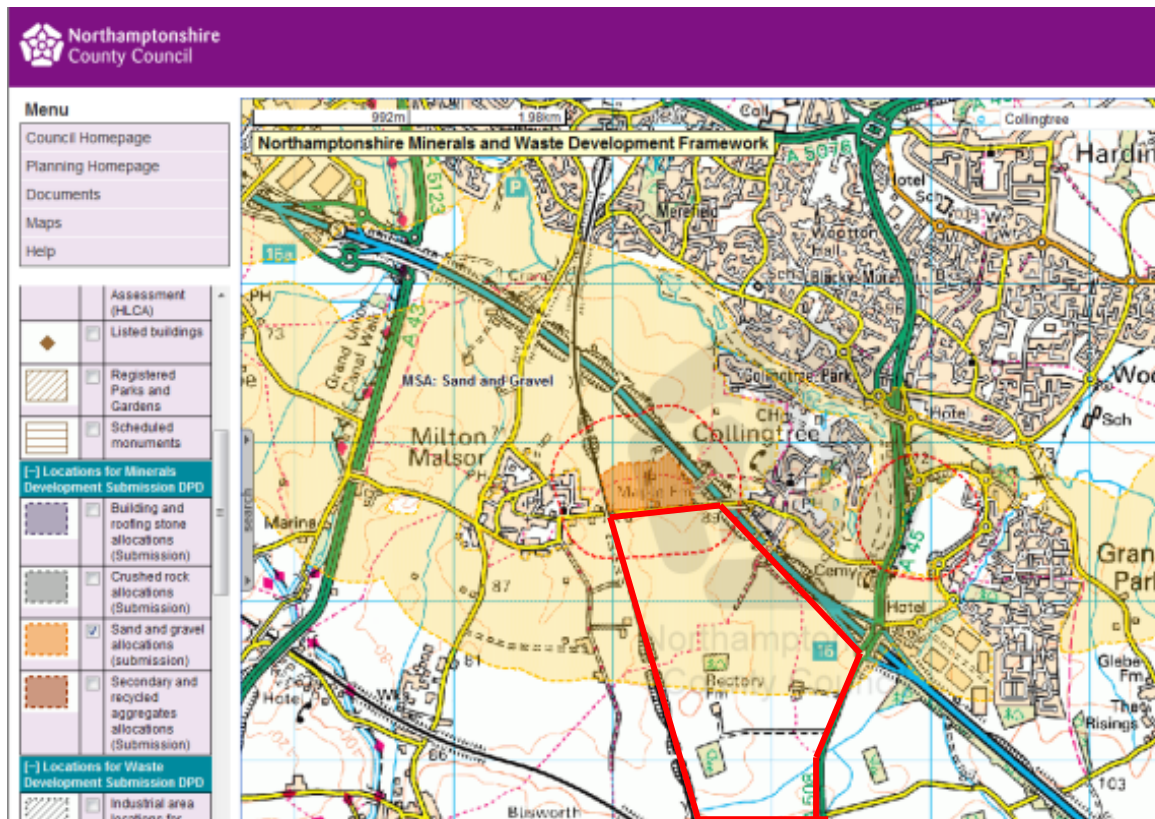
### Mineral Safeguarding Area (MSA)



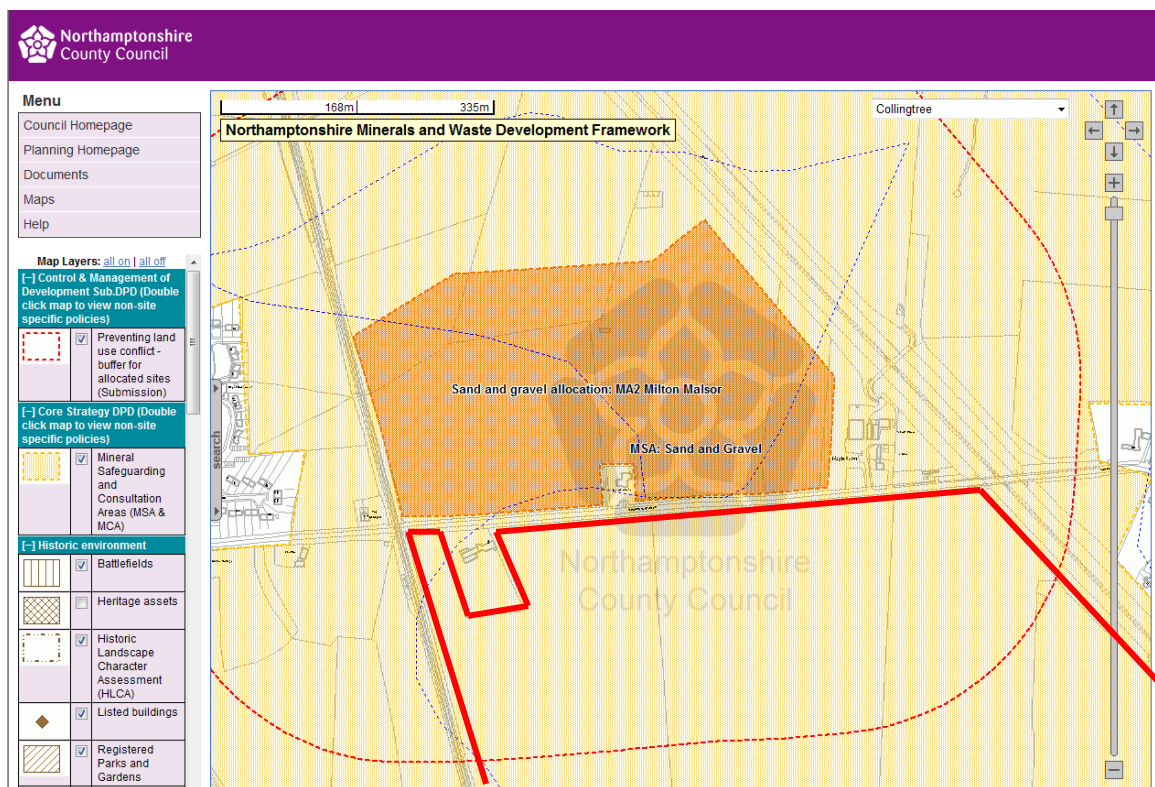
Note: Approximate Main SRFI site (proposed development) Boundary —

Application site lies within MSA.

## Allocated Sand and Gravel extraction Site MA2

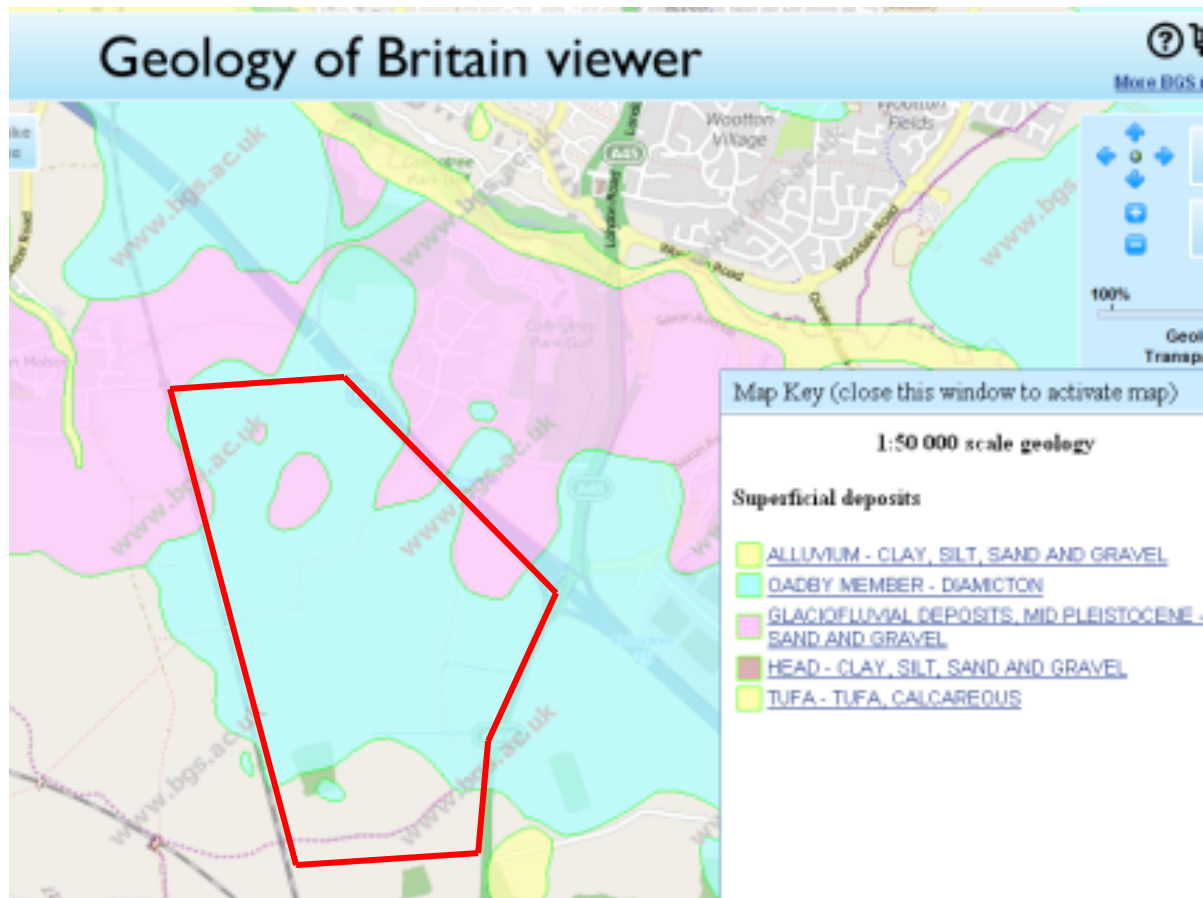


Site is located immediately north of application site.



## Superficial Geology – BGS Interactive Online Viewer Extract





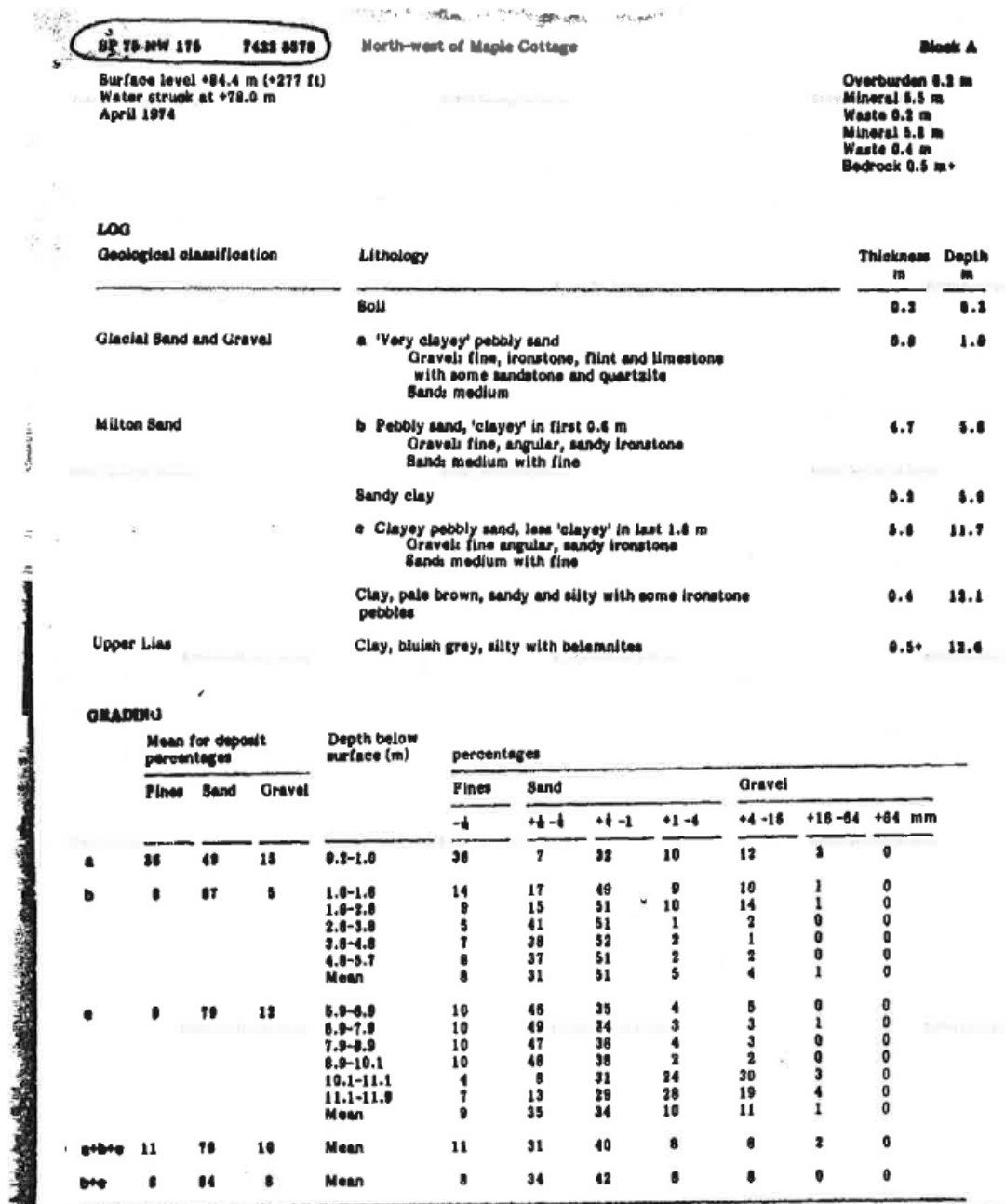
**Application Site Covered in mantle of cohesive Oadby Member (Glacial Till) - Blue.**

**Allocated sand and gravel site MA2 immediately north of application site not covered with Glacial Till, directly underlain by Glaciofluvial sand and gravel - Pink.**

**BGS Borehole On Milton Malsor MA2 Site**





# BGS Borehole Logs



Institute of Geological Sciences

Sheet of

Borehole Reg No: <b>SP 75 NW 175</b> Temp. borehole No: <b>SP 75 NW(34) 175</b> Nat Grid Ref: <b>7422 5578</b> Locality: <b>MILTON MALSOR</b> Surface level: <b>84.4 m O.D. (ft O.D.)</b> Drilled by: <b>SONDADORES</b> Drill type: <b>DANDO 150</b> Hole diameter: <b>(6") 152 mm dia</b> Depth(s) bailed: <b>6.4 m - 11.9 m</b> Date started: <b>17/4/74</b> Date finished: <b>18/4/74</b> Recorded by: <b>E.R. MOZARSKI</b>	Classification of ground <b>Topsoil</b>   <b>Lias</b>	Thickness in <b>0.2</b> <b>11.7</b> <b>0.4</b> <b>0.5+</b>	Nature  <b>Silty Sand</b> <b>brown sandy clay</b> <b>blue/grey silty clay</b>
---	---	--	---

Remarks



Overburden 0.2  
Mineral 5.5  
Waste 0.2  
Mineral 6.0  
Waste 0.4  
Borehole 0.5

Explanation

▽ Groundwater depth first encountered  
 a▽ Morning water level  
 p▽ Evening water level

— Casing depth 12.0m  
 — Borehole depth 12.8m  
 W Water sample

U, sample; solid ornament shows fraction recovered  
 • Spot disturbed sample  
 Bulk sample EM256-267(12)  
 SPT Standard Penetration Test

Geological Classification	Description of Strata	Sampling	Sample Nos	Water level	Drilling and Casing progress
Topsoil	0.2				
 <b>Milton Sand</b> 	Dark brown 'Very Clayey' Silty Sand		EM 256		VCPS
	Sand - medium				
	Pellets - platy sandy ironstone fine		EM 257		CPS
	'Clayey' Silty Sand				
	Sand - orange/brown, fine with medium				
	Orange/brown Silty Gravel		EM 258		PS
	Sand - fine with medium				
	Gravel - platy sandy ironstone fine, ~ 30% sample				
	Light brown Silty fine Sand		EM 259		S
	to fine sandy ironstone				
	As above from 2.8 - 3.8m		EM 260		S
			EM 261		S
	Light brown Silty Clay - medium sand				
	Light brown Sand & Silty Sand		EM 262	WT 64	CPS
	fine platy & S.R. sandy ironstone				
	similar to 5.9 to 6.9		EM 263		CS

Geological Classification		Description of Strata	Sampling	Sample Nos	Water level	Drilling and Casing progress	
		Bulk sample 8 EM 612-619 S.P.T. Standard Penetration Test					
Miller Sand		<del>BROWN FINE SAND WITH TRACE QUARTZ &amp; IRONSTONE</del>					
		Brown Fine Sand - silty with numerous roots	}	EM 612		CPS	
		From 0.7-1.1m light brown fine silty sand					
		hard with trace fine sandstone & ironstone 1.1					
		Light brown very silty fine Pebbly Sand	}	EM 613		CPS	
		Pebbles - fine sandy & platy ironstone					
		Fines < 10%	}	EM 614		CPS	
		Pebbles set in hard compacted sand layers					
			3.1				
		Light brown silty sand	}	EM 615		S	
	Less silty than above 3.1m						
	Trace fine ironstone	4.1					
			EM 616		CS		
		5.1					
			EM 617		CS		
		5.9					
		Light brown Sand with traces of ironstone	}	EM 618		CS	
		pebbles - fine and in layers alternating with sand					
			6.9				
		Light brown fine Sand	}	EM 619		CS	
		More brown silt layers.					
			8.2				
		<del>BROWN SILTY CLAY</del>					
LIAS		Gray silty clay					
			8.8				
		Ended at 8.8m in bedrock					
		E.R.M 29/10/74					



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20<sup>th</sup> April 2015

Our reference: 312598 05 (00) MS

Laura Davidson / Mark Chant  
Minerals and Waste Planner  
Northamptonshire County Council,  
Guildhall Road Block,  
County Hall  
Northampton  
NN1 1DN

**RE: S/2014/2468/EIA**

**M1 Junction 15 – Mineral Safeguarding Issues**

Dear Laura,

Further to your letter dated 6<sup>th</sup> January 2015 forwarded to us via Suzanne Taylor the Principal Planning officer 26<sup>th</sup> March 2015, we write to address the issues you raise with respect to how the proposed development complies with Northamptonshire Minerals and Waste Local Plan (MWLP) (adopted October 2014) Policies 32 and 34. More specifically how it complies and addresses the issues related to Policy 32 and Policy 34.

In order to address this issue it is first important to confirm the wording of the individual policies;

**Policy 32**

*Development of a significant nature within Mineral Safeguarding Areas will have to demonstrate that the sterilisation of proven mineral resources of economic importance will not occur as a result of the development, and that the development would not pose a serious hindrance to future extraction in the vicinity. If this cannot be demonstrated, prior extraction will be sought where practicable”.*

This policy goes on to state that;

*“Development of a non mineral related nature within a Mineral Safeguarding Area which is not compatible with the safeguarding of minerals should not proceed unless;*

- It can clearly be demonstrated that the mineral concerned is no longer of value*
- Or that substantial economically viable deposits of a similar quality exist elsewhere in the county*
- Or the mineral can be extracted where practicable prior to the development taking place*
- Or the incompatible development is of a temporary nature and can be restored to a condition that does not inhibit extraction*
- The development of a minor nature*
- There is an overriding need for the development.”*

*Significant development is defined to be redevelopment of commercial or industrial sites over 1Ha or more.*



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Available information indicates;

- The mineral safeguarding in this area is aimed at being protective of glaciofluvial sand and gravel resources.
- The site sits at levels of between 102 to 80m AOD.
- The ground investigation undertaken upon the site indicates that a mantle of topsoil, subsoil and cohesive Glacial Till up to 11.7m thick is present above any granular Glaciofluvial deposits.
- The Glaciofluvial deposits are highly variable in grading, being locally cohesive in nature, variable in thickness and distribution being absent in many areas beneath the site in the southern part of the site.
- A regional groundwater table appears to be present within the Glaciofluvial deposits at between 79 and 80m AOD which would limit extraction to less than 3m without the requirement for significant dewatering.
- The application site is not allocated or permitted as a future site to provide resource to the county within the 20 year plan.
- Sufficient resources have been identified within the county and “permitted” or “allocated” to provide the required future resource and land bank requirements within the county over the 20 year life of the plan (to 2031) which is providing 13 years more than the required resource suggested to be required by current central government guidelines.
- The site sits within a large swathe of Minerals Safeguarding Area and is relatively insignificant in area to the areas identified for safeguarding.
- The British Geological Survey Mineral Resource Information for development plans Northamptonshire: Resources and Constraints document revealed quite extensive concealed glacial sand and gravel resources, approximately doubling the previously known extent of resources within this area which demonstrates that sand and gravel resources are not scarce within the county.
- Northamptonshire County Council Minerals and waste Local Plan Submission Document: Local Aggregates Assessment 2013 demonstrates a significant decline in the sales of Sand and Gravels between 2002 and 2011 with needs dropping from 0.9M tonnes in 2002 to 0.23M tonnes in 2011.
- Northamptonshire County Council Minerals and waste Local Plan Submission Document; This report also confirms that all but one of the seven surrounding Mineral Planning Authorities have land bank supplies of sand and gravel in excess of 7 years indicating that there is not a regional shortfall in supply availability. The report notes that the quality of the resource can limit extraction opportunities. Whilst it is reported that there had been a diversification from river terrace resources to greater emphasis on exploitation of glacial sands and gravels, it has been reported that the mineral extraction industry had to date (at the time of report) not put forward any applications to exploit glacial sands and gravel resources. It is reported that this is likely to be a result of the more variable and less economic nature of the deposits. The report later confirms that higher yields per hectare are likely to be achieved outside of the county suggesting that this fact makes it less economically feasible to exploit such resources within the County.
- Consultation of the BGS geological mapping and available BGS borehole records suggests that the Milton Malsor allocated site MA2 discussed above is not covered by a mantle of cohesive Oadby Member (Glacial Till) unlike the application site which is shown to be covered by a significant mantle of cohesive Oadby Member (Glacial Till).
- The mineral extraction industry has to date not put forward any applications to exploit glacial sands and gravel resources within Northamptonshire due to the variable quality.
- Higher yields per hectare for sand and gravel exploitation are likely to be achieved outside of Northamptonshire, suggesting that it is less economically feasible to exploit such resources within the Northamptonshire.

Therefore when taking into account the information detailed above and the proposed development proposals it is considered that it would not be economic to undertake prior extraction due to;

- The thick mantle of cohesive Glacial Till (circa 6 -11m depth) overburden which overlies the localised areas of granular Glaciofluvial deposits beneath the northern parts of the site.
- The very mixed and poor quality of resource present being mixed with cohesive soils.
- The elevated groundwater table present within the Glaciofluvial deposits.

Prior extraction and removal of any resource before construction of the planned development (as per NCC policy) is not considered economically feasible, sustainable or environmentally suitable as the excavated materials would need to be replaced with a similar or better imported material to support the proposed development which will be sensitive to differential settlements. In addition the traffic movements to and from the site as a result of any such export and import of replacement materials would have a significant impact upon the already over capacity local highway network around the M1 Junction 15 area.

The Existing information and studies referenced earlier suggest that there are significant sand and gravel resources in the surrounding counties and Mineral Planning Authorities areas to cover the minimum future provision requirements of 7 years. Therefore there is no regional shortage of sand and gravel resources. The yields are reported to be greater in deposits within nearby counties, therefore it is considered less economic to undertake extraction of sand and gravel particularly from glacial sand and gravel sources within the Northamptonshire area.

Whilst it is acknowledged that the proposed development may be seen to sterilise a volume of potential sand and gravel resource within the Northamptonshire County Council Mineral Safeguarding Area there is clearly no shortage of resource elsewhere within Northamptonshire or the region with planned and allocated resources available for the next twenty years in clearly more economically viable areas.

Unlike the proposed development site, the allocated site immediately north of the application site boundary at Milton Malsor (MA2) is not covered by an overburden of cohesive Glacial Till making it easier to exploit the sand and gravel – however, that site still has not been exploited to date due to the economic viability and access issues.

We therefore consider that the proposed development should be permitted without the requirement to undertake prior removal of the mineral resource as we have demonstrated that it would not be economic or sustainable to remove the proposed mineral resource and that there is sufficient allocated and permitted mineral resources present elsewhere within the county and surrounding county areas for more than 20 years and that demand is diminishing not increasing.

With regard to the economic need for the development proposed, this is set out in other parts of the planning application. However, in brief there is a compelling economic case for the proposals which would enable the retention and expansion of a well-established and successful employer. Having undertaken a comprehensive site search, there are no alternative single sites able to accommodate the buildings required by Howdens.

### **Policy 34**

*Proposals for new development adjacent or in close proximity to committed or allocated minerals or waste related development (including associated rail head / links, wharfage, minerals storage / processing facilities and sewage treatment works) should only be permitted where it can be demonstrated that it would not adversely affect the continued operation of the facility or prevent or prejudice the use of the site.*

*Proposals for development considered to be incompatible with committed or allocated minerals or waste development will be required to undertake an assessment of potentially adverse impacts identifying practical measures, including the use of separation areas, for preventing the occurrence (either now or in the future) of land use conflict and potential adverse environmental effects resultant from ongoing occupation and usage (of the proposed development) this may include an assessment of potential impacts including bio-aerosols, odour, noise, dust, etc. The following should be taken into consideration in proposals for incompatible development in determining adequate separation areas:*

- *nature of both the minerals and / or waste development (committed or allocated) and proposed development (including duration),*
- *compatibility of the proposed activity with the minerals and / or waste development (committed or allocated),*
- *characteristics of any potential adverse environmental effects likely to arise as a result of land use conflict, and*
- *any additional measures considered necessary to mitigate potentially adverse impacts.*



The proposed site development is separated from the allocated site by an adopted highway beyond which it is planned that a significant landscape embankment will be constructed and planted up. Therefore the design of the scheme will not structurally constrain the abstraction of mineral resources at the adjacent Milton Malsor (MA2) and should not be affected visually or by means of dust or noise from the adjacent permitted site if/when it is commenced.

In addition no highway access will be present at this end of the site and as such no highways traffic flow conflicts would be present that would impact or prevent the abstraction of mineral resources at the adjacent Milton Malsor (MA2).

The geology present beneath the proposed development site and the necessary earthworks required to deliver the development site will not impact upon the adjacent Milton Malsor site or detrimentally impact the groundwater table.

We therefore consider that the proposed development should be permitted as it will be compatible with the permitted Milton Malsor (MA2) gravel extraction site and would not adversely affect the operation of the facility or prevent or prejudice the use of the site.

This letter summarises the assessments made throughout the EIA chapter 7 Geology, Soils and Groundwater including more specifically sections 7.4.5, 7.4.9, 7.5.2.2, supported by the reports included in the appendices to the chapter;

Appendix 7.4: Preliminary Sources Study Report

Appendix 7.5: Factual Ground Investigation Report

Appendix 7.6; Preliminary Ground Investigation Interpretative Report

Appendix 7.7; Geology, mineral safeguarding, allocated site plans & BGS borehole logs.

We hope that this letter provides you with sufficient information to answer your original query satisfactorily.

However, should you have any remaining queries please do not hesitate to contact us. We would be happy to come in and meet with you to discuss any remaining concerns in greater detail if required.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Darren Bench', is located below the 'Yours Sincerely,' text.

**For RSK**

Darren Bench

Associate Director

CC: Steve Harley (Oxalis Planning)  
Ian Rigby (Roxhill developments Ltd)

**RE: 313418 M1 Junction 15 West - Revised NSIP application**

Laura Davidson [LDavidson@northamptonshire.gov.uk]

You forwarded this message on 13/09/2016 15:16.

Sent: Tue 13/09/2016 14:12

To: Darren Bench

Cc: Mark Chant

Hi Darren,

Thank you for sending the information through for M1 Junction 15 West - Revised NSIP application. I can confirm we have no objections to the proposal on the basis of it being located within a Mineral Safeguarding Area.

The letter you sent on 20<sup>th</sup> April 2015 provided evidence that the application S/2014/2468/EIA satisfied Policies 32 and 34 of the MWLP. As this revised proposal has a similar boundary to that application we are also satisfied that it meets these policies.

Kind regards,

Laura Davidson

Senior Planner

Northamptonshire County Council

Tel: (01604) 367214

E-mail: [ldavidson@northamptonshire.gov.uk](mailto:ldavidson@northamptonshire.gov.uk)

