



# Planning Policy Committee

**A meeting of the Planning Policy Committee will be held in the Jeffrey Room, the Guildhall, St Giles Street, Northampton, NN1 1DE, on Tuesday 25 October 2022 at 6.00 pm**

## Agenda

1.	<b>Apologies for Absence and Notification of Substitute Members</b>
2.	<b>Declarations of Interest</b> Members are asked to declare any interest and the nature of that interest which they may have in any of the items under consideration at this meeting.
3.	<b>Minutes</b>
4.	<b>Chair's Announcements</b> To receive communications from the Chair.
5.	<b>Brockhall Conservation Area (Pages 5 - 98)</b>
6.	<b>Ise Valley Strategic Plan (Pages 99 - 104)</b>
7.	<b>South Northamptonshire Local Plan Part 2 - Employment Allocations Supplementary Planning Document (Pages 105 - 1152)</b>
8.	<b>Updated West Northamptonshire Local Development Scheme (Pages 1153 - 1172)</b>
9.	<b>Northampton Local Plan Part 2: Consultation on Further Main Modifications (Pages 1173 - 1210)</b>

<b>10.</b>	<p><b>Urgent Business</b></p> <p>The Chair to advise whether they have agreed to any items of urgent business being admitted to the agenda.</p>
<b>11.</b>	<p><b>Exclusion of the Press and Public</b></p> <p>In respect of the following items the Chairman may move the resolution set out below, on the grounds that if the public were present it would be likely that exempt information (information regarded as private for the purposes of the Local Government Act 1972) would be disclosed to them: The Committee is requested to resolve: "That under Section 100A of the Local Government Act 1972, the public be excluded from the meeting for the following item(s) of business on the grounds that if the public were present it would be likely that exempt information under Part 1 of Schedule 12A to the Act of the descriptions against each item would be disclosed to them"</p>

Catherine Whitehead  
Proper Officer  
17 October 2022

**Planning Policy Committee Members:**

Councillor Rebecca Breese (Chair)	Councillor Matt Golby (Vice-Chair)
Councillor Adam Brown	Councillor Phil Bignell
Councillor Stephen Clarke	Councillor Jonathan Harris
Councillor Jamie Lane	Councillor Kevin Parker
Councillor Wendy Randall	Councillor Cathrine Russell

**Information about this Agenda**

**Apologies for Absence**

Apologies for absence and the appointment of substitute Members should be notified to [democraticservices@westnorthants.gov.uk](mailto:democraticservices@westnorthants.gov.uk) prior to the start of the meeting.

**Declarations of Interest**

Members are asked to declare interests at item 2 on the agenda or if arriving after the start of the meeting, at the start of the relevant agenda item



## **Local Government and Finance Act 1992 – Budget Setting, Contracts & Supplementary Estimates**

Members are reminded that any member who is two months in arrears with Council Tax must declare that fact and may speak but not vote on any decision which involves budget setting, extending or agreeing contracts or incurring expenditure not provided for in the agreed budget for a given year and could affect calculations on the level of Council Tax.

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If you have any queries about this agenda please contact Ed Bostock, Democratic Services via the following:

Email: [democraticservices@westnorthants.gov.uk](mailto:democraticservices@westnorthants.gov.uk)

Or by writing to:

West Northamptonshire Council  
One Angel Square  
Angel Street  
Northampton  
NN1 1ED

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# WEST NORTHAMPTONSHIRE COUNCIL PLANNING POLICY COMMITTEE

25 October 2022

**Rebecca Breese, Strategic Planning, Built Environment & Rural Affairs**

<b>Report Title</b>	<b>Brockhall Conservation Area</b>
<b>Report Author</b>	<b>Anna Wilson, Heritage Policy Assistant, anna.wilson@westnorthants.gov.uk</b>

## Contributors/Checkers/Approvers

<b>West S151</b>	Martin Henry	Approval email received 4/10/2022
<b>Director</b>	Stuart Timmis	Consulted on 22/09/2022
<b>Communications Lead/Head of Communications</b>	Becky Hutson	Approval email received 26/09/2022
<b>Legal</b>	Neil Weeks	Consulted on 23/09/2022

## List of Appendices

### Appendix A – Draft Brockhall Conservation Area Appraisal and Management Plan 2022

#### 1. Purpose of Report

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To seek agreement to consult on the draft Brockhall Conservation Area Appraisal and Management Plan (2022).

#### 2. Executive Summary

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2.1 The report contains background information on the process of reviewing the Brockhall Conservation Area and the requirements regarding public consultation on the draft B

Conservation Area Appraisal and Management Plan Supplementary Planning Document (SPD), which includes information about proposed changes to the conservation area boundary, proposed candidates for the local list, and proposals for an Article 4(1) Direction (appendix A).

### **3. Recommendations**

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3.1 It is recommended that the Planning Policy Committee:

- a) Agrees that public consultation be undertaken on the draft Brockhall Conservation Area Appraisal and Management Plan SPD (appendix A), which includes proposed changes to the conservation area boundary
- b) Agrees that public consultation be undertaken on proposed Article 4(1) Direction controlling development with regards to:
  - Alteration of windows
  - Alteration of doors
  - Alterations to roofing
  - Alterations to walls, gates or fences
  - Addition of roof lights or skylights.
  - Laying of hardstanding

### **4. Reason for Recommendations**

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To accord with the council's Consultation and Engagement Framework, the Statement of Community Involvement (SCI) for the Daventry area and Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires local authorities to hold a public meeting to publicise draft proposals within an appraisal, for the relevant stakeholders of the affected area.

### **5. Report Background**

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The council has a statutory duty under the 1990 Planning (Listed Building and Conservation Areas) Act to review its conservation areas. Brockhall was first designated as a conservation area in 1976 and was last reviewed in 1999. It has no up-to-date conservation area appraisal and management plan. As such, this is the first opportunity in some time to review the architectural and historic interest of the conservation area and assess whether the boundary is fit for purpose.

The current conservation area boundary (1999) covers the whole village, excluding recent agricultural buildings northwest of Manor Farmhouse. It includes Brockhall Hall, its gardens and parkland, which are designated as a Registered Park and Garden, as well as areas of enclosed pasture on the northwest and southeast sides of the village. It is proposed to amend the conservation area boundary in four areas; to include an area of ridge and furrow earthworks and a small spinney on the southeast side of the village; to include a 19th century cart shed and a small spinney on the northeast edge of the conservation area; to include a belt of trees on the northwest edge of the conservation area called Gazewell Spinney, parts of which date back to the 19<sup>th</sup> century; and to include a small woodland called Rectory Spinney, parts of which date back to the first half of the 19<sup>th</sup> century.

A draft conservation area appraisal and management plan has been prepared for Brockhall Conservation Area. Public consultation on the draft appraisal is now required in order to allow stakeholders to provide their views and to inform the document, as well as to meet the requirements of the 1990 Planning (Listed Building and Conservation Areas) Act and the council's statement of community involvement.

Following the consultation exercise a further report would be made to Planning Policy Committee. This report would set out the responses received and suggest any changes resulting from the consultation and recommendations. Should committee decide to continue with the proposal, the new conservation area boundary would then be formally designated. The council would then need to consider whether the character or appearance of the area would be affected by future development. The relevant policies in the West Northamptonshire Joint Core Strategy and Settlements & Countryside Local Plan would apply, together with policies in the National Planning Policy Framework. The conservation area appraisal and management plan would be adopted as an SPD and would be a material planning consideration, helping to apply relevant policies.

Certain permitted development rights would also be more restrictive and additional controls would apply with respect to works to, or felling of, trees.

The draft appraisal and management plan identifies a proposal to include buildings in the council's local list of buildings and sites. This list contains buildings and sites which do not meet the criteria for listing by Historic England but are of sufficient local importance that they warrant policy protection. At this stage, draft entries for Brockhall are proposed but this could change following the consultation exercise.

The appraisal identifies certain features as being of particular importance to the character of the conservation area. Some of these, however, could be changed under national permitted development rights. The appraisal and management plan therefore contains initial proposals for a non-immediate Article 4(1) Direction. Such Directions can be used to remove permitted development rights for prescribed matters where this is considered necessary to protect local amenity or the well-being of the area. In this case, the proposal would be to remove permitted development rights that relate to matters of particular importance to the character of the area. This would not prevent such changes being made, but they would require planning permission.

There is a formal procedure for making an Article 4 Direction. At this stage it is proposed that public consultation is undertaken on the principle of introducing an Article 4 Direction and the results of that consultation will be reported back to Planning Policy Committee.

A draft conservation area appraisal and management plan has been prepared for Brockhall, following an initial meeting held online with residents. It is suggested that a six-week consultation period now be undertaken, including a public meeting held in such a way that the risks of Covid-19 are minimised.

## **6. Issues and Choices**

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- 6.1 Conservation area status and an adopted appraisal and management plan, which has the status of an SPD, adds weight to the consideration of non-designated heritage assets in decision-making.

making. It also provides detail for applicants and decision makers on the special interest of the conservation area as a designated heritage asset. The proposed conservation area boundary for Brockhall and the draft appraisal and management plan has been produced with the aim of providing proportionate and effective means of protecting the special architectural and historic interest of Brockhall for the benefit of present and future generations. Public consultation on the proposed boundary and the draft appraisal would help to inform the document and enable it to proceed to the next stage in the process, which would be its consideration for adoption as an SPD.

- 6.2 The alternative option would be not to agree to the public consultation on the draft Brockhall Conservation Area Appraisal and Management as an SPD.
- 6.3 Not agreeing to the commencement of the public consultation would prevent the proposed changes to the conservation area boundary being made and the conservation area appraisal and management plan proceeding for adoption as a supplementary planning document. This would leave the council without valuable tools with which to protect and enhance the special architectural and historic interest of Brockhall.

## **7. Implications (including financial implications)**

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### **7.1 Resources and Financial**

- 7.1.1 There could be some minor costs for printing documents, but it is envisaged that this could be met within existing budget.

### **7.2 Legal**

- 7.2.1 SPDs are defined by the Planning and Compulsory Purchase Act 2004. The detailed requirements for SPDs and their adoption are provided by the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 7.2.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on local authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 7.2.3 Directions made under Article 4 of the Town and Country Planning (General Permitted Development)(England) Order 2015 (No. 596) (as amended) require planning permission to be obtained for works which would otherwise be permitted development.

### **7.3 Risk**

There are no significant risks arising from the recommendations in this report.

### **7.4 Consultation**

Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires of local authorities that they hold a public meeting to publicise draft proposals within an appraisal, for the relevant stakeholders of the affected area.

A presentation publicising the review and inviting initial questions from residents took place online on Wednesday 7 September and was attended by local residents.

The next stage would include a formal consultation on proposed changes to the conservation area boundary and the draft conservation area appraisal and management plan. It is therefore recommended that the draft document is consulted on for a minimum of six weeks during which time a public meeting will be held to inform stakeholders (residents, interested parties, statutory consultees).

The Covid-19 pandemic necessitates a different approach to consultations. Firstly, a decision will need to be taken as to whether or not it is appropriate, having regard to any Government advice at the time, to commence the consultation. The public meeting would be held in a way that minimises the risks to staff and the public. It is normal practise to have hard copies of documents available at the council offices and libraries, as well as having them available online. Access to these buildings may be limited, therefore it might be necessary to offer the availability of free copies delivered to households on request (it is assumed that most households would be happy to read the document online).

#### **7.5 Consideration by Overview and Scrutiny**

No comments from Overview and Scrutiny.

#### **7.6 Climate Impact**

The assessment and up to date designation of the conservation area should not have any material consequences for climate change. Specifically, under the proposed Article 4(1) Direction, proposals for energy conservation measures and renewable energy devices could still come forward but would be judged in the balance with any adverse impacts on the village's character.

#### **7.7 Community Impact**

- 7.7.1 Consulting on the draft appraisal would not have any negative implications regarding crime and disorder.
- 7.7.2 The proposed course of action should not have any perceptible differential impact on people with different protected characteristics with the possible exception of disability. Accordingly, the consultation materials will be provided in alternative formats if required.

## 7.8 Communications

The document has been checked for accessibility. Support will be provided by the Communications and Consultation Team to maximise engagement with the formal consultation process.

## 8. Background Papers

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- [Department of Communities and Local Government \(2021\) National Planning Policy Framework](#)
- [Planning \(Listed Building and Conservation Areas\) Act 1990](#)
- [The Town and Country Planning \(General Permitted Development\) \(England\) Order 2015 with amendments](#)



# **Brockhall Conservation Area Appraisal and Management Plan**



**Consultation Draft 2022**



**West  
Northamptonshire  
Council**

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# 1 Introduction

## 1.1 Why has this document been produced?

West Northamptonshire Council is currently undertaking reviews of existing conservation areas within the Daventry area and assessing the designation of new conservation areas where appropriate. The Brockhall Conservation Area was designated in 1976 and last reviewed in 1999. This review provides an opportunity to set out the architectural and historic interest of the Brockhall Conservation Area, to aid the sensitive management of change with regard to the historic environment. Hence, this document has been produced to inform that review, and is published alongside the boundary of the conservation area.

A public online meeting was held on 7<sup>th</sup> September 2022 to inform this draft document. Advice on how to comment is set out in Section 1.4 below.

## 1.2 What status will this document have?

It is intended that, following consultation, this document will be adopted as a supplementary planning document. As such it will be a material planning consideration in the determination of future planning decisions.

## 1.3 What is the purpose of this document?

Conservation area appraisals identify and describe the features which contribute to the special architectural or historic interest of a conservation area. As a Supplementary Planning Document, the appraisal is a 'material consideration' in the determination of planning decisions, and as such the information contained within the document should be used to manage change in a manner sensitive to the character and appearance of the conservation area.

A Management Plan for the conservation area has also been produced, which can be found at Section 11. The appraisal identifies both positive elements of the conservation area and those under threat. Recommendations have been provided in the Management Plan to address any specific issues identified in the appraisal and to guide the future management of the conservation area.

This appraisal has been produced in accordance with current guidance from Historic England *Conservation Area Appraisal, Designation and Management 2019*, as well as national and local policy and legislation.

## 1.4 How do I comment on this document?

Any comments on this document or the proposed conservation area designation should be made in writing no later than ..... (late representations will not be accepted).

Comments can be made:

by completing a questionnaire which can be accessed via the website [Conservation areas | West Northamptonshire Council \(westnorthants.gov.uk\)](https://www.westnorthants.gov.uk/conservation-areas)

by email to [heritage.ddc@westnorthants.gov.uk](mailto:heritage.ddc@westnorthants.gov.uk);

by letter to Anna Wilson, Heritage Policy Assistant, West Northamptonshire Council, Lodge Road, Daventry, NN11 4FP.

### **1.5 How is this document structured?**

The appraisal begins with an introduction to conservation areas and background policy and legislation at Section 2. Details of the conservation area boundary can be found in Section 3, followed by a Summary of Special Interest for the conservation area in Section 4. Section 5 provides information on the location of the conservation area and its wider landscape context, whilst Section 6 contains a brief explanation of the historic development of the conservation area including historic mapping. A spatial analysis is set out in Section 7, including examination of the contribution of important green spaces, areas of archaeological potential, views and an open space analysis.

Following on from this, Section 8 provides details on local architectural styles, materials and building forms, including boundary treatments. Section 9 expands on this, setting out design guidelines within the conservation area.

Section 10 sets out opportunities to enhance the character and appearance of the conservation area, based on the findings of the

review. This includes proposals for Article 4 Directions and proposed candidates for the Local List. Details of proposed boundary changes can be found in Section 10.4.

A Management Plan is set out in Section 11. This plan takes forward the findings of the appraisal and sets out threats and corresponding recommendations to aid future management of the conservation area.

Sources, further reading and information as well as copyright details can be found following the Management Plan.

A list of all designated heritage assets in the conservation area can be found at Appendix A.

### **1.6 Who is this document intended for?**

This document is intended for anyone with an interest in development which may affect the character or appearance of the Brockhall Conservation Area. This includes, but is not limited to, homeowners, developers, statutory undertakers, planning officers and inspectors.

## 2 Policy and Legislation

### 2.1 What is a conservation area?

A conservation area can be defined as an

“...area of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance”.

Section 69 Planning (Listed Buildings and Conservation Areas) Act 1990.

These areas contain features and characteristics which make them unique, locally distinctive, historic places. Conservation areas can take many and varied forms; those in the Daventry area are largely centred on rural villages, but also include several historic parks, the Grand Union and Oxford Canals, Daventry Town Centre, and the Daventry Reservoir.

### 2.2 Why do we designate conservation areas?

Conservation areas protect our nation’s distinct, local heritage. West Northamptonshire Council has an obligation to assess and designate areas of special architectural or historic interest as conservation areas. In undertaking this duty, the council must then pay special attention to the desirability of preserving or enhancing the character or appearance of designated conservation areas. The intention of conservation area designation is not to stop development, but rather to manage change in a way which preserves rather than erodes the qualities which make it special.

The National Planning Policy Framework (2019, paragraph 185) also encourages West Northamptonshire Council to provide a positive strategy for conservation, allowing for,

- the desirability of sustaining and enhancing the significance of heritage assets;
- the wider social, cultural and economic benefits which the conservation and enjoyment of the historic environment can bring; and
- the desirability of new development making a positive contribution to the local character and distinctiveness; and
- the opportunities to draw on the contribution made by the historic environment to the character of a place.

### 2.3 What does it mean to live and work in a conservation area?

Whilst living or working in a conservation area means some extra planning considerations, these exist to care for the historic or architectural features which contribute to a place’s special character. Conservation area controls are most likely to affect owners who wish to undertake works to the outside of their building or trees on their property.

Demolition

If you wish to demolish a building within a conservation area you will need planning permission.

Trees

If you wish to cut down, top or lop any tree over 75mm in diameter at 1.5m above ground, you must inform West Northamptonshire Council six weeks before work begins. This allows the authority to consider the contribution the tree makes to the character of the area and if necessary create a Tree Preservation Order to protect it.

#### Other works

Some works within conservation areas require planning permission:

- Cladding the exterior of a house;
- Any side extensions or rear extensions of more than one storey;
- Alterations to roofs, including dormer windows;
- The installation of satellite dishes and antennae;
- Demolition or erection of walls, gates and fences over 1m in height adjacent to a public highway.

Some other minor works remain as 'permitted development' within conservation areas. Advice on Permitted Development can be sought from the council's Development Control department.

Where such changes would harm local character the council can introduce special controls, known as Article 4 directions, which withdraw particular permitted development rights. The result is that planning permission is required for these changes.

West Northamptonshire Council is exploring the possible use of Article 4 Directions as part of this conservation area appraisals project. See Section 10.2 for more information.

If you are considering undertaking work to your property and are unsure about whether it requires permission, please contact West Northamptonshire Council at [planning.ddc@westnorthants.gov.uk](mailto:planning.ddc@westnorthants.gov.uk). Please note that works may also require Listed Building Consent.

#### Energy Efficiency and Heritage

Improving energy efficiency forms part of the wider objective to achieve sustainable development, and most historic buildings can accommodate improvements when a good balance is struck between maximising energy benefits and minimising harm to the historic environment in accordance with current best conservation practice. Often small changes can make a difference.

Bear in mind that some alterations may require planning consent and works to listed buildings will require Listed Building Consent in most cases.

## 2.4 Further Information

Further information regarding conservation areas can be found on our website at [Conservation areas | West Northamptonshire Council \(westnorthants.gov.uk\)](https://www.westnorthants.gov.uk/conservation-areas). For advice relating to development within conservation areas, please contact the council's Development Management department via

Email: [planning.ddc@westnorthants.gov.uk](mailto:planning.ddc@westnorthants.gov.uk) or

Telephone: 0300 126 7000



Information and advice for those living and working within conservation areas can also be found on the Historic England website at:

[Living in a Conservation Area | Historic England](#)

If adopted, the conservation area appraisal and management plan will have the status of a Supplementary Planning Document.

### **3 Summary of Conservation Area Boundary (1999)**

Beginning just north of the junction of the lane to Little Brington and Brockhall Road, the conservation area boundary follows Whilton Brook and then the fenceline southwest until it reaches the M1 motorway. Here, it turns to the northwest. It follows the edge of the motorway, including the belts of trees at the edge of the parkland in the conservation area, until it reaches a mill race, which it follows for approximately 80m. The mill race is included in the conservation area. After this, it turns to the northeast and follows a hedge line for 390m before turning southeast, again following the another hedge line and including them both in the conservation area.

On reaching the lane that leads to Brockhall, the boundary crosses the lane and follows the hedge on the opposite side in a north-easterly direction, excluding a small woodland but including the pasture to the southwest. At the edge of the woodland the boundary continues in a south-westerly direction, now following the boundary of the Rectory rear garden, excluding it from the conservation area.

To the rear of the Rectory building, the boundary turns to the northeast and includes the building and the grounds on its east side. Where it meets the access to the modern agricultural buildings at the rear of Manor Farmhouse, it turns to the southwest, excluding these buildings but it quickly turns to the southeast, thus including Manor Farmhouse, its gardens, boundary treatments and other historic buildings on its northwest and northeast sides. The

boundary then continues in a straight line across the southern part of an area of pasture for a distance of 59m before turning southwest. On meeting the road, it follows the fence line on its northeast side, thus including it in the conservation area, in a south-easterly direction to where it began. The conservation area boundary, therefore, includes the whole village, Brockhall Hall and its gardens and parkland.

The line of the conservation area boundary as shown on the map is intended to follow existing physical boundary features wherever possible. This provides certainty regarding the extent of the designated area. All fences, walls, hedge lines, tree lines and watercourses that form the conservation area boundary are within the conservation area.

Figure 1: Map showing the current conservation area boundary (1999)

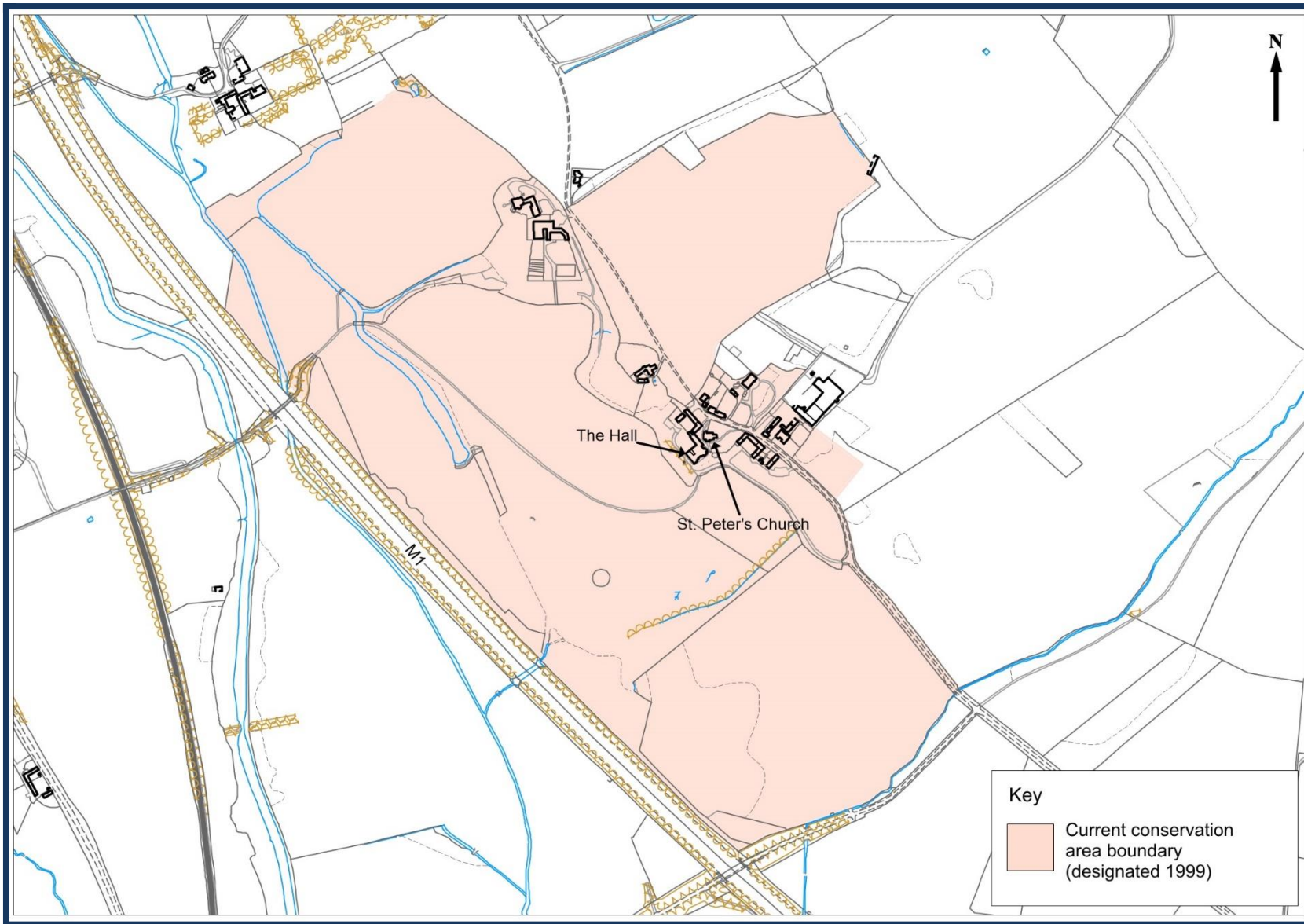


Figure 2: Map showing the current conservation area (1999), the registered park and garden, and the nearby scheduled Monument and the Grand Union Canal conservation area designations

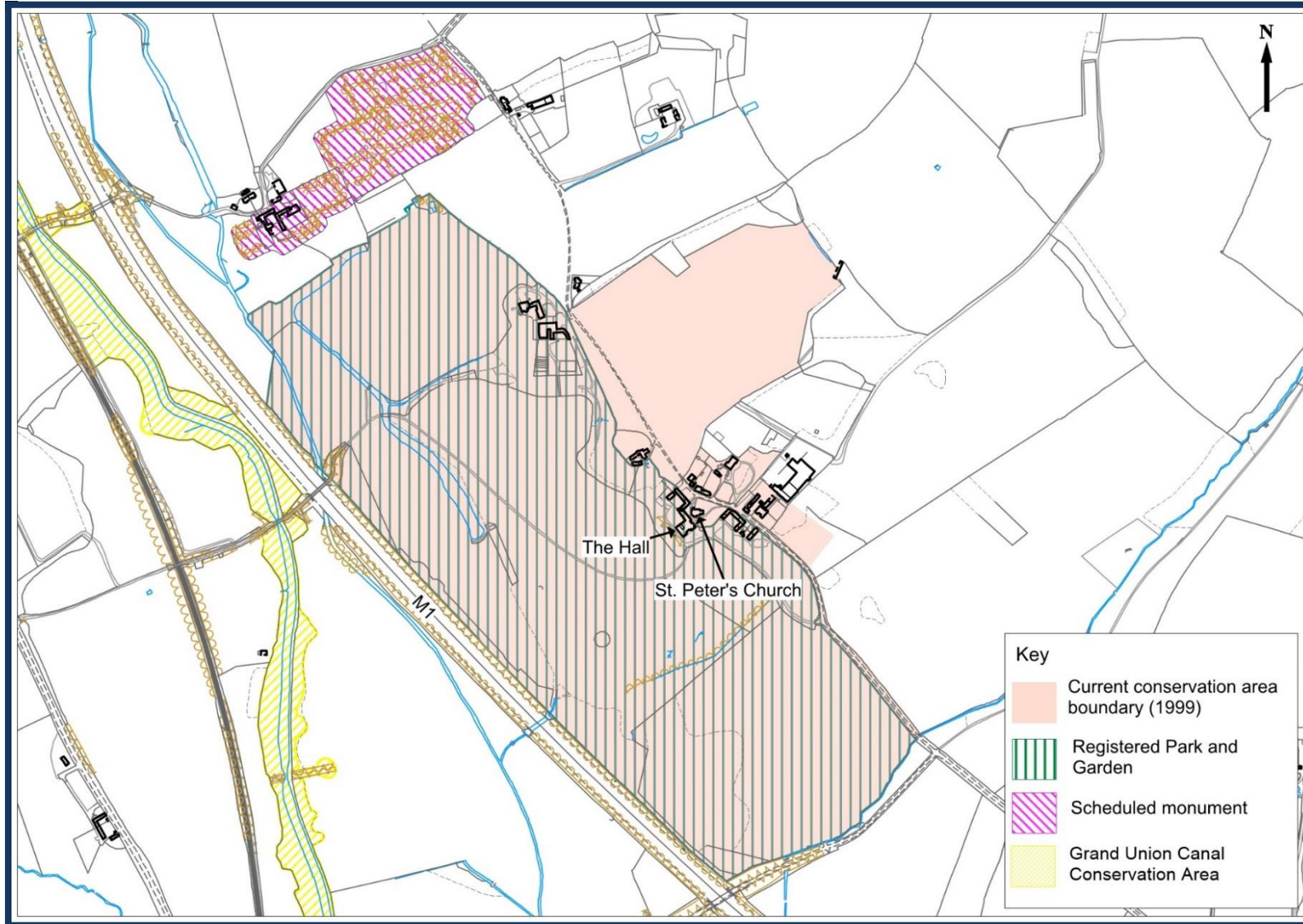
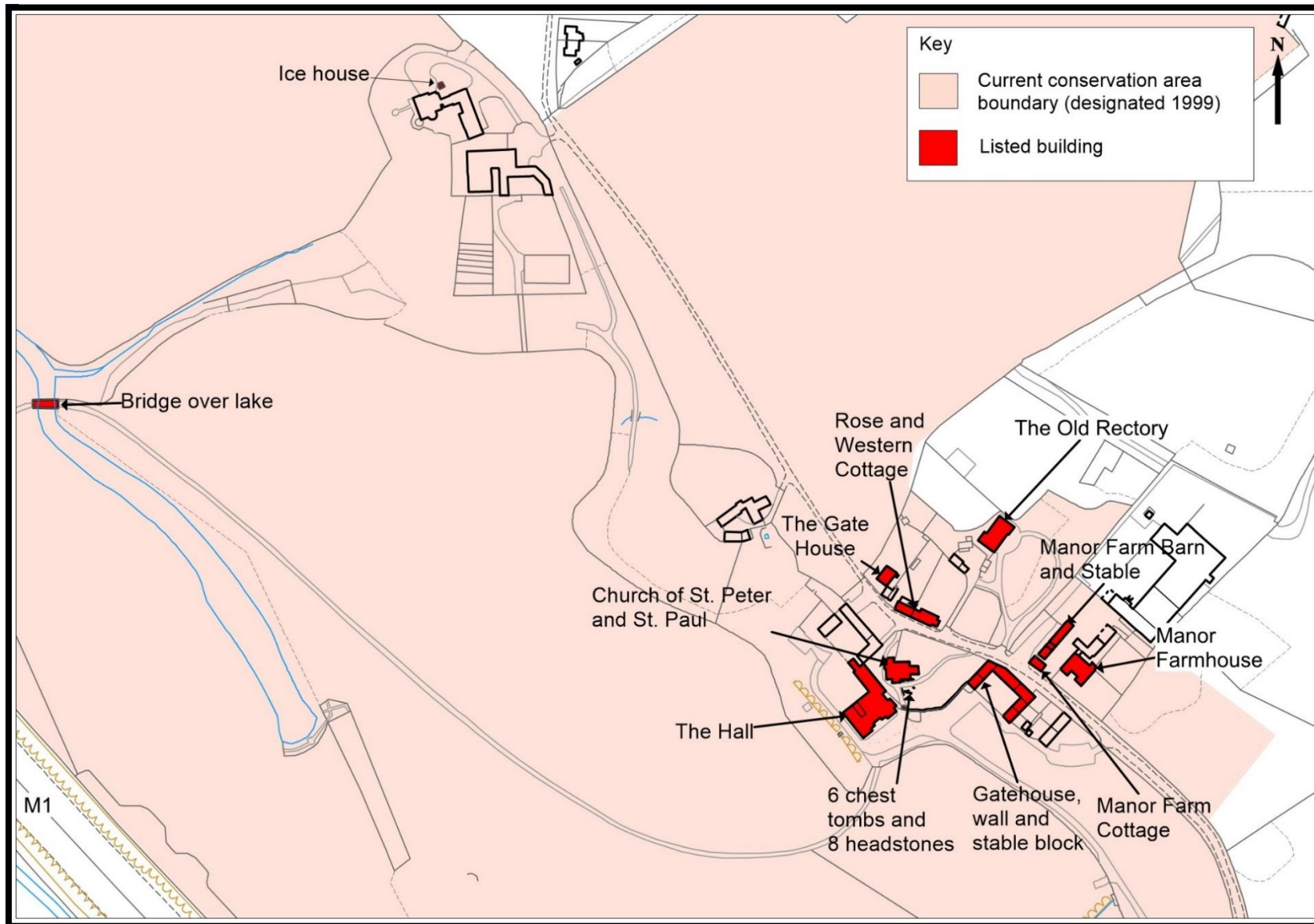




Figure 3: Listed buildings within the conservation area



### 3.1 Proposed boundary 2022

Figure 4 shows the proposed boundary changes.

It is proposed to amend the conservation area boundary to:

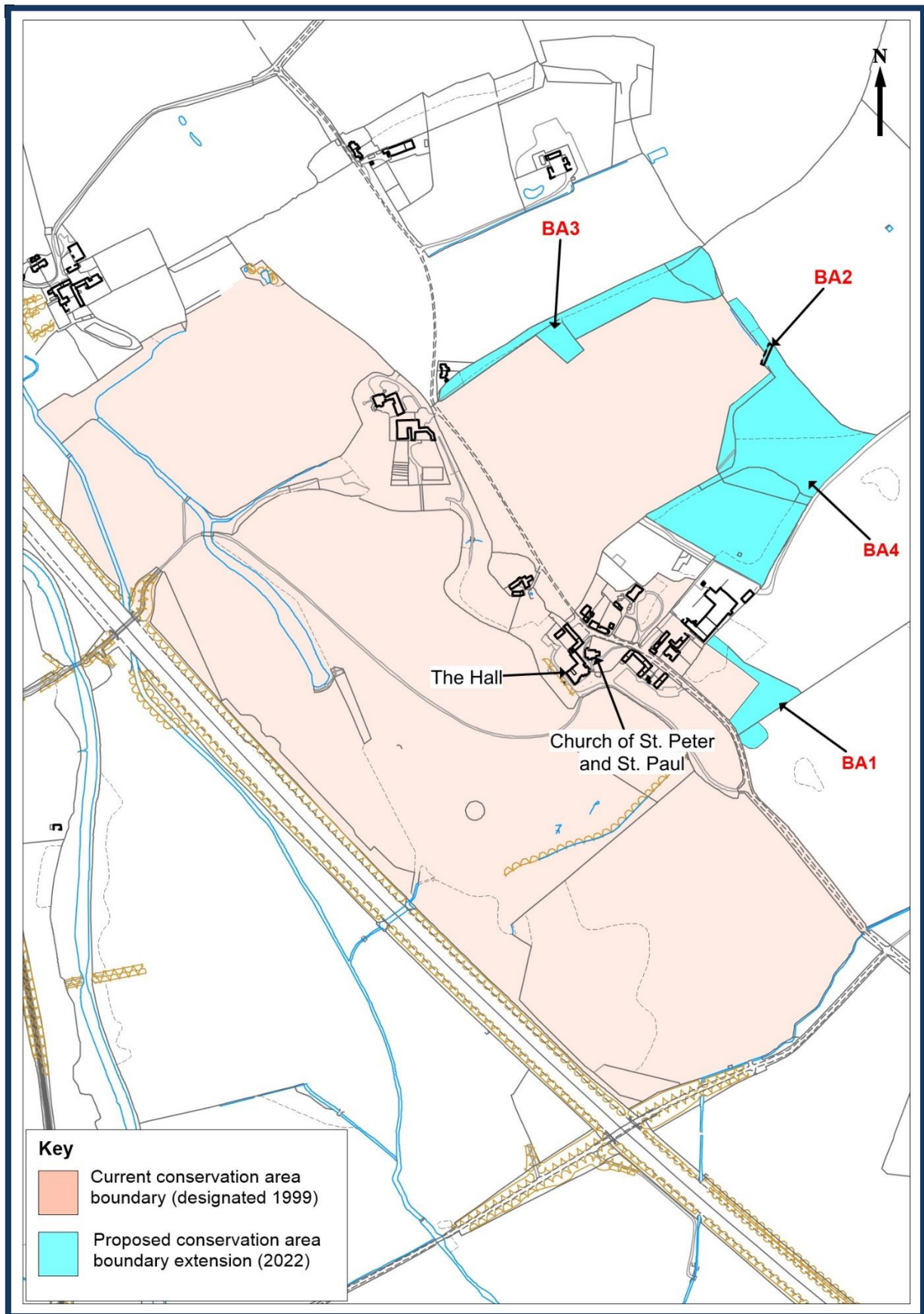
- Include an area to the southeast of Manor Farmhouse (BA1). This area forms part of a larger enclosure, a portion of which immediately to the northwest is already included in the conservation area. The whole area contains ridge and furrow earthworks and it forms part of the setting of the Grade II\* listed Manor Farmhouse. A small group of trees at the southwest corner adds to the secluded character of Brockhall as the conservation area is approached from the south.
- Include cart shed north of Rectory Spinney and a small clump of trees on its north side (BA2). This is a late 19<sup>th</sup> century brick-built cart shed divided into seven bays that contributes to the rural and historic character of the landscape. The clump of trees to its north is depicted on the 1839 Tithe Map and is a historic feature of the landscape dating back to at least the early 19<sup>th</sup> century. In conjunction with Gazewell Spinney and Rectory Spinney it contributes to the enclosed and secluded atmosphere of the conservation area.
- Include a belt of trees known as Gazewell Spinney running northeast from Gazewell Cottages (BA3). The spinney probably originated in the second half of the 19<sup>th</sup> century with the addition of an area of conifers during the 20<sup>th</sup> century, although some areas are shown as wooded on the

1839 tithe map. The spinney has, therefore, formed part of the historic landscape for at least 150 years. Although there is some later planting, there is a significant number of deciduous trees. The spinney shields views of the conservation area from the north and northwest but once inside the conservation area it creates a sense of enclosure and seclusion.

- Include Rectory Spinney, a small woodland that lies northeast of The Old Rectory. It is depicted on the 1839 Tithe Map and on the later 1888 Ordnance Survey map, which shows that by this time the area of tree cover had increased. The spinney has, therefore been a feature of the historic landscape of Brockhall since at least the first half of the 19<sup>th</sup> century. Along with Gazewell Spinney it contributes to the secluded and enclosed character of the conservation area (BA4).

NB: The line of the conservation area boundary as shown on the map is intended to follow existing physical boundary features wherever possible. This provides certainty regarding the extent of the designated area. All fences, walls, hedge lines, tree lines and watercourses that form the conservation area boundary are within the conservation area.

Figure 4: Map showing the current conservation area boundary and proposed extensions



## 4 Summary of Special Interest

Special architectural or historic interest can manifest in a variety of forms. Current guidance from Historic England sets out types of special interest which have led to designation, including;

- Areas with high numbers of designated heritage assets, and a variety of architectural styles and historic associations
- Those linked to a particular industry or individual with a particular local interest
- Where an earlier, historically significant, layout is visible in the modern street pattern
- Where a particular style of architecture or traditional building materials predominate
- Areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those on the Historic England Register of parks and gardens of special historic interest.

The special interest of the Brockhall Conservation Area derives from the following key characteristics:

- The majority of buildings in the village are listed. There are eleven listed buildings in all, including the Church of St. Peter and St. Paul, The Hall and Manor Farmhouse, which are all listed at Grade II\*, and a further six listed chest tombs and eight headstones in the churchyard

- The gardens and parkland of Brockhall Hall are designated as a Grade II Registered Park and Garden
- There are also several non-designated heritage assets that contribute to the historic character of the conservation area through their vernacular character and use of characteristic building materials such as ironstone and slate
- The majority of the buildings and boundary walls in the village, including several recent developments, are constructed from local ironstone, which gives the conservation area a coherent character
- A number of buildings that formerly served The Hall are now in residential use but have retained features pertaining to their former usage, for example, The Stables and The Mews.
- There are several areas of archaeological interest within the conservation area that have the potential to yield information about the development of Brockhall, for example possible medieval earthworks southeast of The Dairy and west of The Hall. Elsewhere, extant archaeological earthworks such as ridge and furrow and hollow ways provide evidence of past land use and the layout of the settlement
- A series of historic maps from the 1670s onwards provide valuable documentary evidence for the development of the village and the surrounding landscape, including changes to the gardens and parkland of Brockhall Hall
- There are many individual and groups of trees that contribute to the parkland character of the conservation area. Trees also play an important part in softening the built environment and enhancing the rural and secluded



character of the village. Belts of trees along the southwest side of the parkland play an important role in screening the M1 motorway and reducing noise pollution.

- There are important views through the conservation area particularly through the built environment of the village, through the southern part of the park, and outwards towards the surrounding rural landscape. The Church of St. Peter and St. Paul is a landmark building within the village and its tower is prominent in views looking south towards the village (see Section 7.4).

## 5 Location and Settlement Context

Brockhall is located between Daventry and Northampton. It lies within the Upper Nene Catchment and Watford Gap Environmental Character Type<sup>1</sup> and within Historic Landscape Character Area 11a<sup>2</sup>, which in this area of the county takes the form of a broad valley through which the River Nene and its northern tributary flow. The valley is characterised by low lying farmland mainly of arable fields but with grassland lying closer to watercourses. The valley is sparsely settled with occasional farms and houses located on sloping land away from the floodplain. Villages have generally not been subject to extensive 20<sup>th</sup> century expansion. A number of deserted medieval villages survive as archaeological earthworks and associated below-ground deposits, including the site of Muscott which lies outside but immediately to the north of the conservation area and is designated as a scheduled monument [BROCKHALL PARK, Brockhall - 1001383 | Historic England](https://historicengland.org.uk/listing/the-list/list-entry/1001383).

Brockhall sits at a height of 110m OD on a southwest-facing slope which falls away gently into the valley of the River Nene below. To the northeast of the village the land continues to rise gently to a height of 130m.

The underlying geology comprises intermittent bands of ironstone rich Marlstone Rock Formation, from which many of Brockhall's buildings are constructed. There are also significant bands of

alluvium, Sands and Gravels and limited areas of Boulder Clay covering the solid geology.

The conservation area includes almost all the buildings in the village except agricultural buildings north of Manor Farmhouse and two late 20<sup>th</sup> century semi-detached houses at the north end of the conservation area. It includes the grade II registered park and garden designation that relates to the designed landscape park associated with Brockhall Hall. [BROCKHALL PARK, Brockhall - 1001383 | Historic England](https://historicengland.org.uk/listing/the-list/list-entry/1001383)

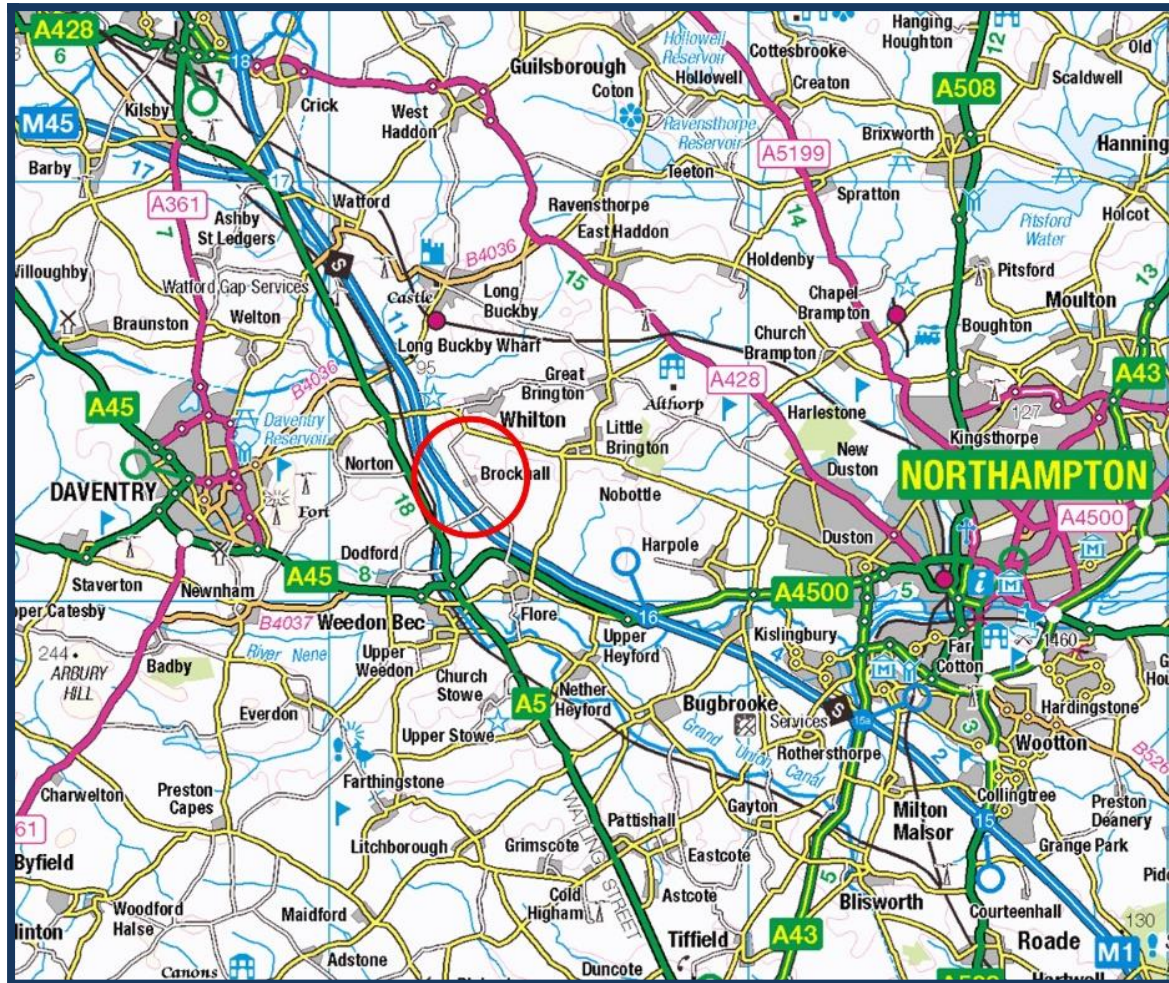
The Grand Union Canal conservation area lies to the west, as does the former Roman road of Watling Street, now the A5. The M1 motorway runs immediately adjacent to the southwest side of the conservation area and registered park and garden and impinges on the area's rural character and views towards the parkland from this direction.

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<sup>1</sup> Environmental Character Assessment and Key Issues  
<http://rnrpenvironmentalcharacter.org.uk/>

<sup>2</sup> Historic Landscape Character Assessment  
<http://rnrpenvironmentalcharacter.org.uk/>

Figure 5: Map showing the location of Brockhall



## 6 Historical Development

As a settlement, Brockhall is known to date back to at least the 11<sup>th</sup> century since it is recorded in the 1086 Domesday Survey. It is recorded together with Muscott, which lies 1km to the northwest, as having 6 households at that time. By the 14<sup>th</sup> century Muscott was probably the larger settlement before it eventually became abandoned. Hearth tax returns from 1674 record 17 houses between the two settlements but since Bridges records 12 houses at Brockhall in 1720 and only three at Muscott, it would appear that by the 17<sup>th</sup> century Brockhall was the larger settlement. It may not have changed that considerably in size from the village that can be seen today. Areas of earthworks at the north and south ends of the village<sup>3</sup> suggest some shrinkage in the later medieval period, as does 1672 Map of the Lordship of Brockhall<sup>4</sup>, which shows several buildings situated to the north and northwest of the Hall.

On the north side of the village, and to the north of The Gatehouse, there are three embanked enclosures that are probably the remains of property plots on which there were cottages and gardens, possibly of medieval date. One of the plots still appears to be occupied by a building on the 1672 Map of the Lordship of Brockhall but all are depicted as unoccupied on a 1793 map<sup>5</sup> of the village. A

slightly earlier map of 1787<sup>6</sup> records this area as Brockhall Green. The small rectangular green that is today located immediately northwest of the churchyard is, therefore, a remnant of what was previously a much larger green. The 1672 map also records two further 'homesteads' to the northwest of the Hall.

Thus, the documentary evidence suggests that Brockhall was always a small settlement that mainly developed along a single street, with another lane branching off to the northwest from The Green, which shrank at its north end prior to the turn of the 19<sup>th</sup> century.

The road layout to the south of the village was slightly different to that which is seen today. A sunken trackway or hollow way survives as an earthwork between Brockhall Road and the driveway to the hall and it continues running down the slope to the southwest, towards Dodford, as a 2m-deep linear depression. This route is thought to have gone out of use by the early 19<sup>th</sup> century.

The open field system within the parish was enclosed by private agreement, rather than by parliamentary act, in 1619-1620, although cartographic evidence suggests that some areas to the east of Watling Street were already enclosed by 1614<sup>7</sup>. There are

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<sup>3</sup> An Inventory of the Historical Monuments in the County of Northamptonshire, Volume 3, Archaeological Sites in North-West Northamptonshire (1981)

<sup>4</sup> 1672 Map of the Lordship of Brockhall by Henry Murcott (NRO Map/5704 and 5705)

<sup>5</sup> 1793 Plan of the Estate of Andrew Harleston at Brockhall (NRO Map/1431)

<sup>6</sup> 1787 Plan of the Estate (NRO Map/3682)

<sup>7</sup> An Inventory of the Historical Monuments in the County of Northamptonshire, Volume 3, Archaeological Sites in North-West Northamptonshire (1981)

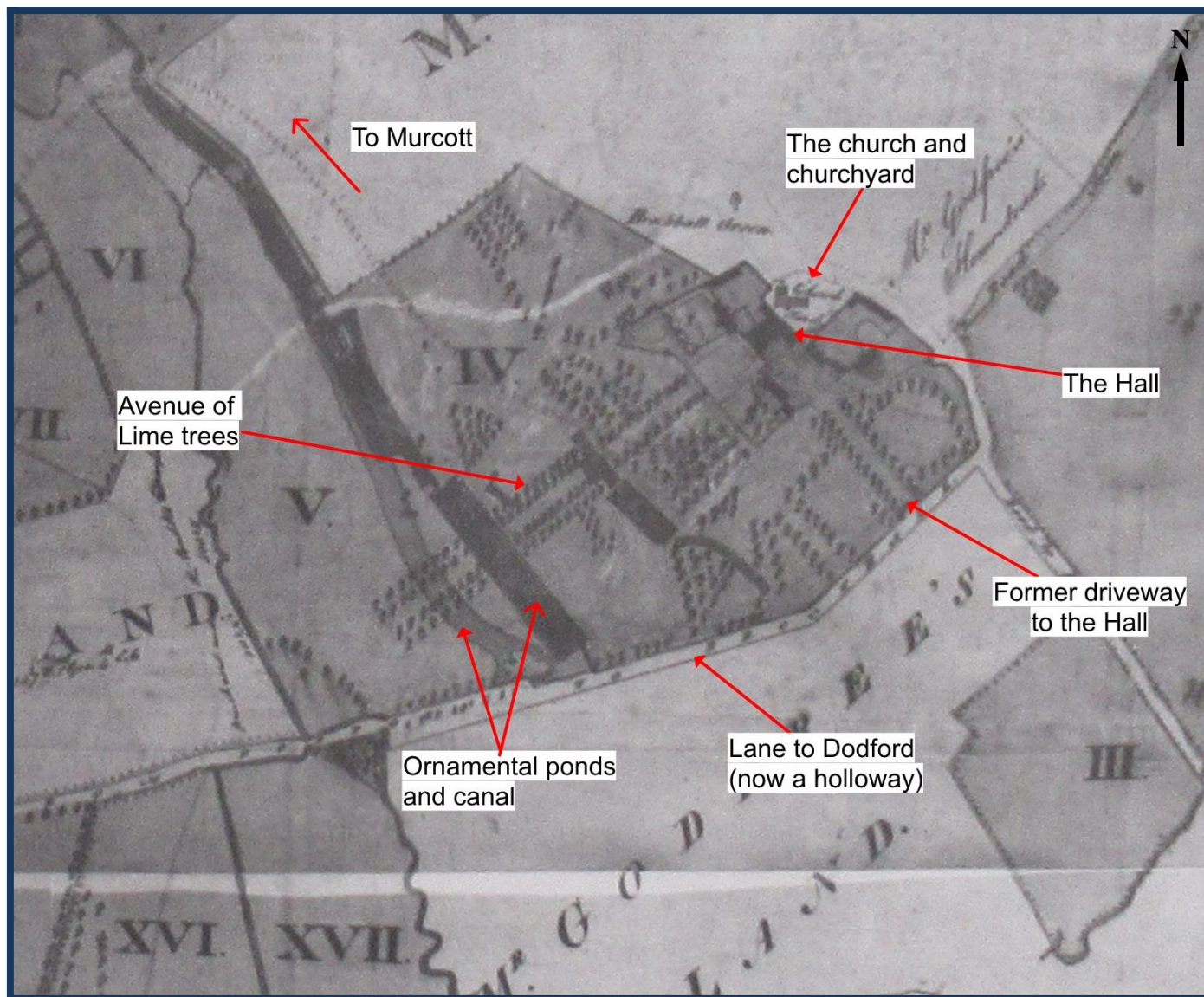
several areas of well-preserved ridge and furrow earthworks within the conservation area, especially at its southeast end.



Figure 6: Extract from the 1672 Map of Brockhall showing the layout of the village and surrounding landscape in the 17<sup>th</sup> century.



Figure 7: Extract from the 1787 Plan of the Brockhall Estate showing the layout of the formal gardens and landscape park in the 18<sup>th</sup> century





Brockhall Hall was built in the early 1600s by Edward Eyton, who subsequently sold it to the Thornton family in 1625. It was remodelled in the 1740s and again in 1800 in the Gothic style. The building is Grade II\* listed. Extensive works to the gardens were undertaken in the 1720s and 1730s by Thomas Thornton III, at which point a number of cottages, which are depicted on the 1672 estate plan, may have been removed<sup>8</sup>. A tree-lined avenue was added as part of these works. It ran towards the southeast façade of the hall from the lane to Dial House, now a hollow way earthwork, and was the principal approach to the Hall. A second avenue was planted which ran southwest from the formal gardens through the park. Other works included creating a series of ponds and a canal, a parterre and the laying out of walkways (see Figure 7). A number of these features, particularly the ponds and several rectangular enclosures, are discernible on the ground as earthworks<sup>9</sup>.

Further changes were made to the park and gardens in the early 1800s to follow the fashion at this time of the picturesque movement. The kitchen garden was added approximately 300m north of the hall. Whereas previously the southern park boundary was marked by the lane to Dial House, after the lane had gone out of use the park was extended on its south side as far as the lane to Dodford. To the north, the original boundary of the park followed the line of the pleasure grounds walk, joining the kitchen garden and the ironstone bridge. Again, in the early 19<sup>th</sup> century the park

expanded northwards beyond this line to its current extent<sup>10</sup>. The formal elements of the gardens and park, such as the parterre and the avenues of trees were removed.

An important feature of the early 19<sup>th</sup> century park was the long, narrow lake, which was formed from the ornamental canal of the earlier landscape park. It was modified to include a short tail at its south end. The approach to the hall was also changed as part of the early 19<sup>th</sup> century works to the park. A new driveway was constructed from Watling Street, to the west, which entered the park some 600m northwest of the hall. It crossed the lake towards its north end via an ironstone, three arched bridge (now Grade II listed) and followed the valley before climbing the slope up to the hall, offering a variety of set-piece views through the parkland. The driveway is no longer in use and is largely turfed over but its line can still be seen on the ground. The approach to the hall from the south was also altered c. 1800. The driveway from the Dial House lane was abandoned, the lane now being disused, and a new driveway that left the Brockhall Road and swept around the west side of a spinney was created. This remains the route to the Hall today.

The Hall largely influenced the development of the village on the west side of the road when the stable block was built around three sides of a courtyard in about 1799 and the building now known as The Mews was constructed immediately to the north of the Hall. On

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<sup>8</sup> Northamptonshire Historic Environment Record, Monument UID 6715-MNN2671

<sup>9</sup> [historicengland.org.uk/listing/the-list/list-entry/1001383?section=official-listing](http://historicengland.org.uk/listing/the-list/list-entry/1001383?section=official-listing)

<sup>10</sup> *ibid*



the east side of the road the barn and stable to the rear of Manor Farm Cottage were built during the 18<sup>th</sup> century. The Gatehouse was built in the late 18<sup>th</sup> century and the Old Rectory followed shortly afterwards, being built at the beginning of the 19<sup>th</sup> century.

There was very little further change until the late 20<sup>th</sup> century when 1 and 2 The Coachhouse and 1 and 3 The Mews were constructed. Other 20<sup>th</sup> century development includes the construction of some large agricultural buildings northeast of Manor Farmhouse but these are situated just outside the conservation area boundary.

Figure 8: Extract from the 1839 Tithe Map showing the layout of the village and 19<sup>th</sup> century changes to the landscape park







Figure 10: Contemporary mapping showing key historic features

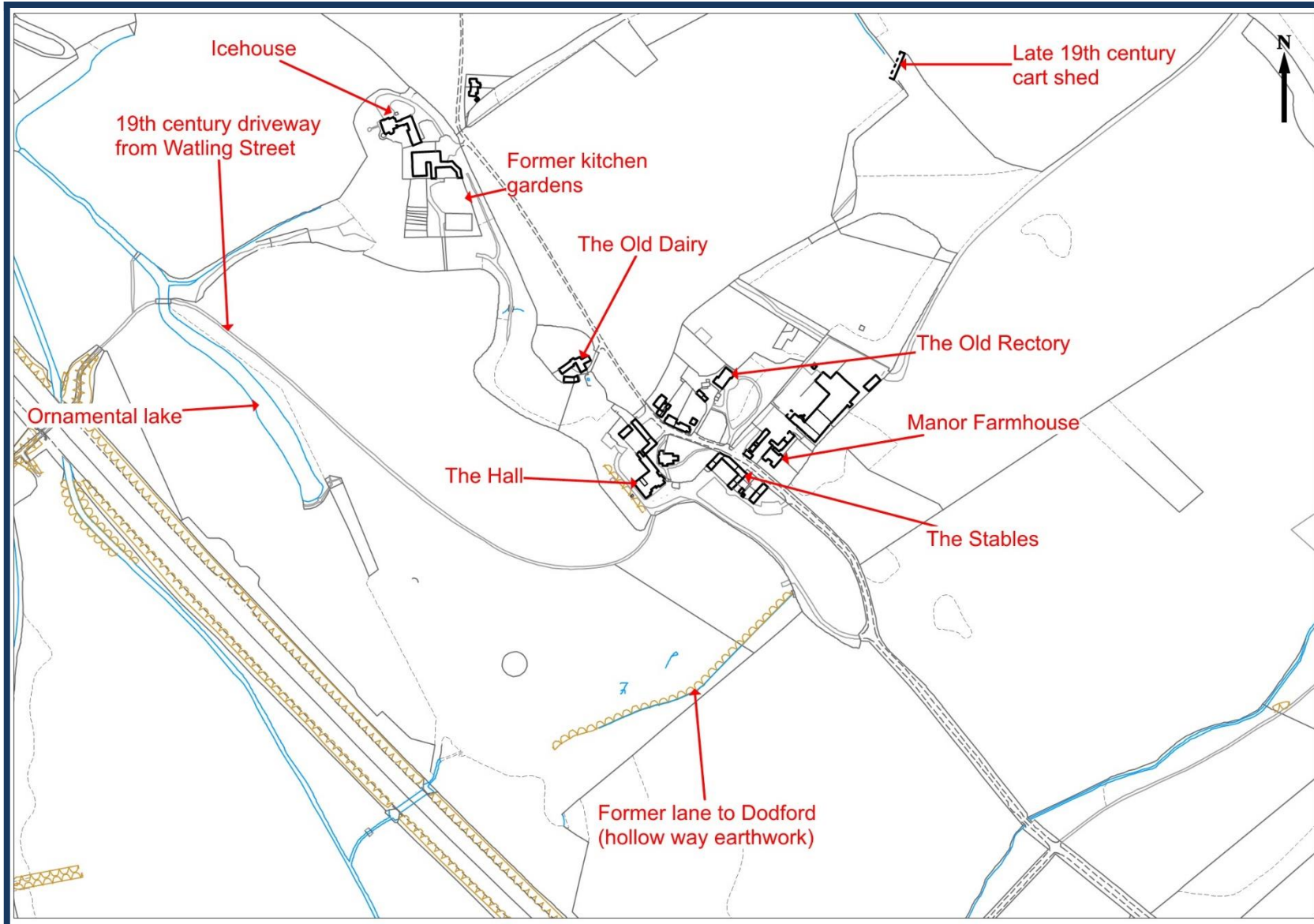
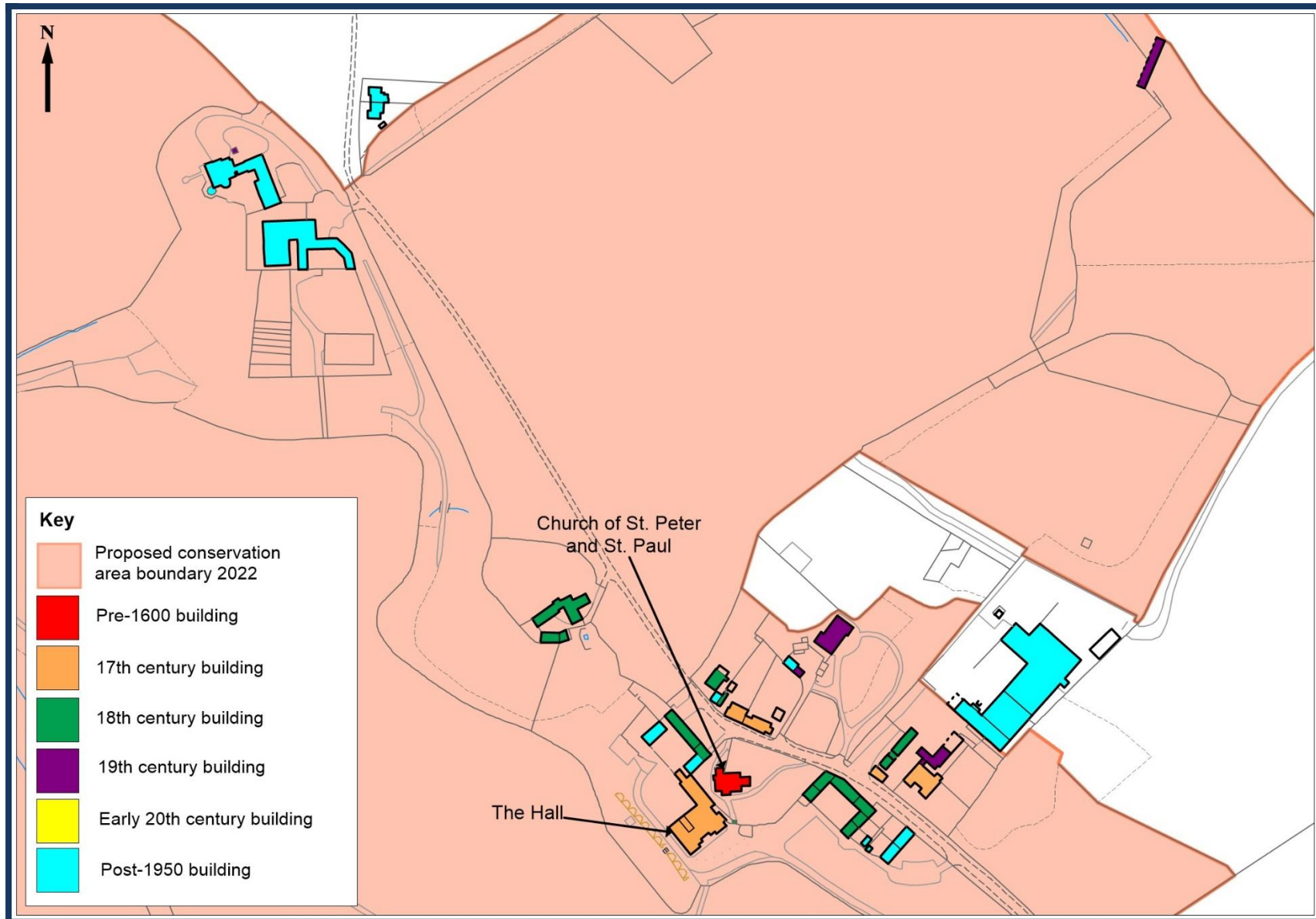


Figure 11: Map showing probable building ages within the proposed conservation area and its immediate surroundings



## 7 Spatial Character

Settlement character is not only formed by the buildings within a conservation area; but also the spaces between those buildings and other features of interest. This could include settlement layout, green infrastructure, trees, open spaces, the public realm, and views. The contribution of these “spatial” features to the character and appearance of the conservation area is set out below.

### 7.1 Spatial Character Summary

The village of Brockhall is situated on a slope that gently rises up from the valley bottom of the River Nene to the southwest. To the northeast of the village, the land continues to rise gently. The conservation area lies within the Hemplow Hills, Cottesbrooke and Brington Special Landscape Area.

Despite the proximity of the M1 motorway, which lies 430m to the southwest and is immediately adjacent to the southwest boundary of the conservation area, the village maintains a rural and secluded atmosphere. This is partly due to the numerous tree belts and clumps within the park of Brockhall Hall which help to shield it from the motorway.

The approaches to the conservation area from the north and southeast are along single-track lanes, in places lined with hedges and trees. To the north of the village the lane passes through an area of unenclosed pasture which perpetuates the parkland character of the wider conservation area.

Figure 12: The approach to Brockhall from the southeast

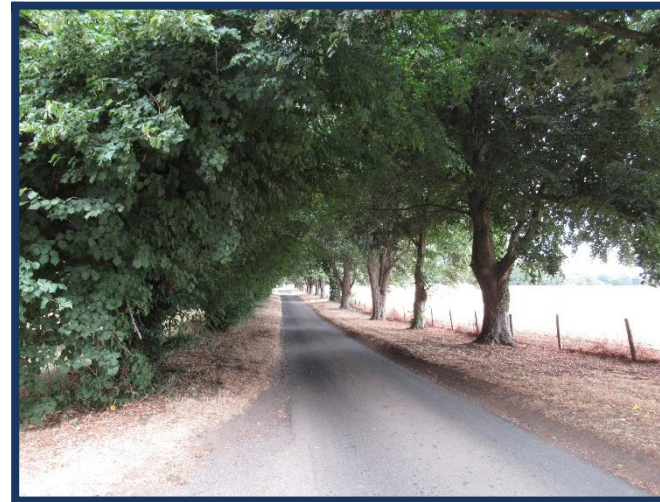


Figure 13: The approach to Brockhall from the north



Brockhall village has a nucleated settlement pattern with the majority of buildings situated adjacent to the main route through the village. The exceptions to this are the Hall and The Old Rectory, which are situated behind the church and Rose Cottage respectively. The Old Dairy and The Grange are located further north, a little distance away from the main area of settlement.

There is a somewhat different character between the opposite sides of the road in Brockhall village in terms of building orientation. The Hall stands southwest of the road immediately adjacent to, and behind the church with its entrance facing southeast. Two groups of buildings that were formerly the stables and the mews associated with The Hall, are arranged in a U-shape around courtyards with their rear elevations adjacent to the road. This, coupled with the fact that the church stands behind a wall and hedge and The Hall is situated behind the church, gives the impression of seclusion. This is heightened by Nos. 1 and 2 The Coach House and The Old Dairy being situated gable end-on to the road.

By contrast, on the northeast side buildings generally stand with their front elevations facing the road with the exception of The Gatehouse, which is gable-end on, and The Old Rectory, which is set back a considerable distance from the road.

Buildings either stand immediately adjacent to the road or, if they are set back from it, they have stone boundary walls or hedges. This makes the road through the village feel narrow and enclosed for much of its length except where an impression of space is created by the churchyard and the rectangular green on its

northwest side, as well as the gardens of the Old Rectory which lie opposite the churchyard.

The Old Dairy is somewhat separated from other buildings, standing outside the gated entrance to the village with The Green lying between it and The Mews.

On the southwest side of the village lies the early 19<sup>th</sup> century landscape park associated with Brockhall Hall. Roughly rectangular in shape, it contains many individual parkland trees and groups of trees, which were planted as part of the redesign of the park between the Hall and the walled garden, and the walled garden and the listed bridge over the lake. The park contains a number of features pertaining to the earlier landscape, such as a hollow way earthwork of the former lane to Dial House; ridge and furrow earthwork from the medieval open system; field boundaries laid out when the open fields were enclosed in the 17<sup>th</sup> century; and other earthworks possible pertaining to the medieval settlement and the 18<sup>th</sup> century formal gardens.

There are a number of important views within, from and towards the conservation area (see Section 7.4 for details). Along the road through the village views are relatively short due both the curving layout of the road and the almost continuous line of buildings, walls and hedges either side. This contrasts with the areas to the northwest and southeast of the village which open out into the countryside, providing longer views out to the surrounding rural landscape. Much of the landscape park is screened from view on its northeast side by buildings in the village and groups of trees planted in the early 19<sup>th</sup> century. However, towards the southeast

there are views through the parkland from the lanes towards Flore and Dodford showing areas of ridge and furrow earthworks from the medieval open field system and the individual and groups of trees that play an important role in creating the parkland character (Section 7.4, views 9 and 10).



## 7.2 Areas of Archaeological Potential

Archaeological interest can be both remains surviving below the ground or evidence for past activity that is contained within standing buildings and structures.

Evidence of past settlement remains in Brockhall contributes to the special historic interest and setting of the conservation area; the archaeological remains enhance the legibility of the development of the settlement and have the potential to yield further evidence of the area's history.

Potential archaeological deposits within the conservation area include:

AP1: The shrunken medieval settlement of Brockhall of which possible remains survive as earthworks in the area of The Green and east of The Old Dairy, as well as west of The Hall. It is also likely that below-ground archaeological deposits exist elsewhere in the village

AP2: The site of the 18<sup>th</sup> century formal gardens that existed southwest of The Hall

AP3: The walled kitchen garden situated 350m northwest of The Hall

AP4: The possible site of a watermill 300m west of The Hall

AP5: The site of a 19<sup>th</sup> century boathouse

AP6: The site of ornamental ponds that were a feature of the early landscape park

AP7: The site of a possible medieval fishpond

AP8-10: Areas of ridge and furrow surviving as earthworks

Potential archaeological deposits on the fringes of the conservation area include:

AP11: the deserted medieval village and double moated site of Muscott which survives as an area of well-preserved earthworks and is designated as a scheduled monument [Muscott deserted medieval village and double moated site, Norton - 1009555 | Historic England](#)

AP12: A possible area of prehistoric occupation

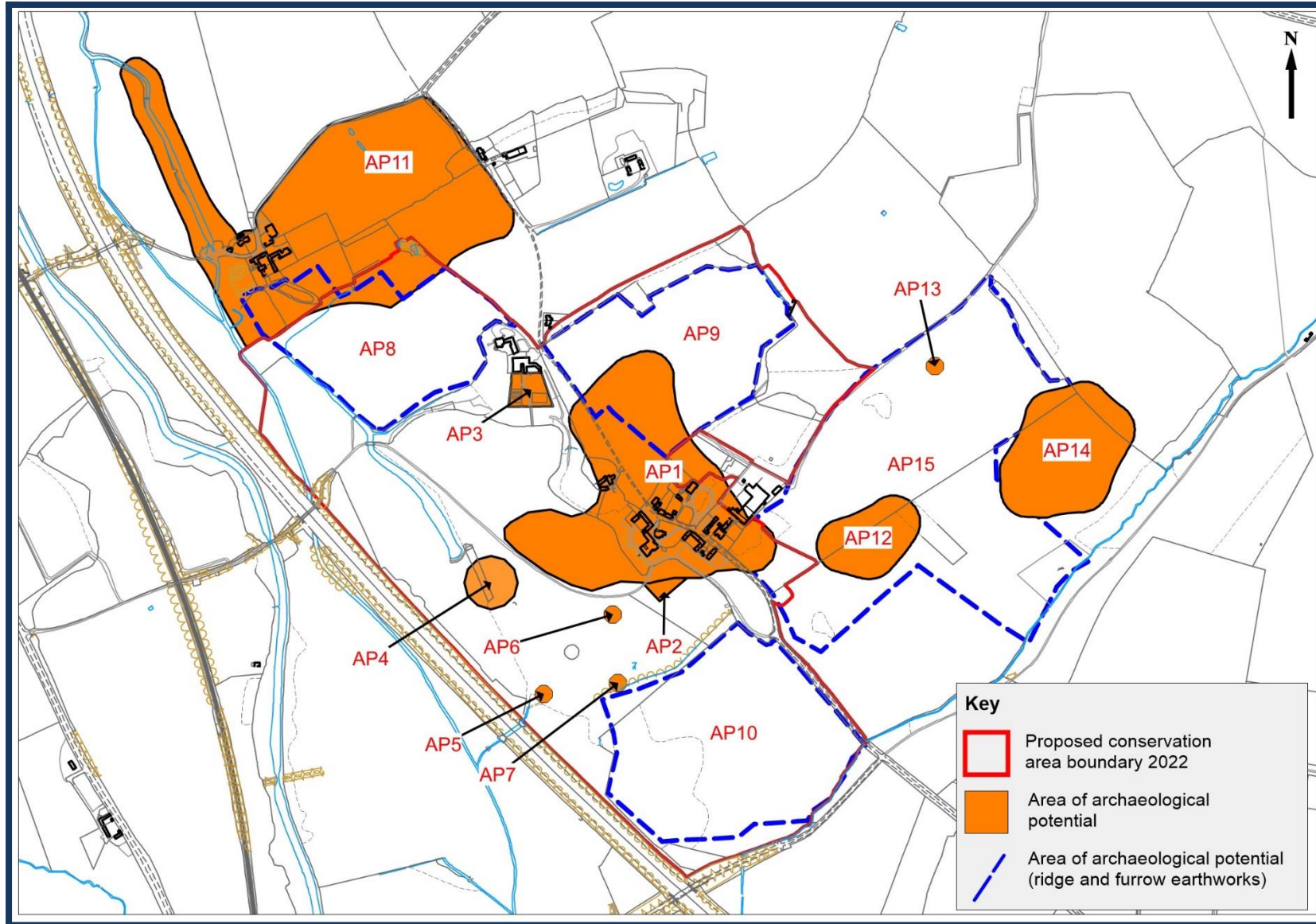
AP13: A ring ditch or possible parkland feature

AP14: A possible area of prehistoric occupation

AP15: An area of ridge and furrow surviving as earthworks.

Areas of archaeological potential which make a particularly strong contribution to the immediate setting of the conservation area will be considered for inclusion within the boundary as per Historic England advice. Not all areas can reasonably be included within the conservation area. The exclusion of areas from the boundary does not reduce their positive contribution to the setting of the conservation area through their historic interest nor preclude the possibility of that area yielding significant archaeological evidence which may enhance our understanding of the past.

Figure 14: Areas of archaeological potential within and on the edge of the conservation area



### 7.3 Trees

There are currently no Tree Preservation Orders or Tree Preservation Order Areas within the conservation area. However, trees make a significant contribution to the rural and parkland character of Brockhall Conservation Area. They contribute to the visual amenity of the village, soften the built environment and enhance the setting of the conservation area.

Ornamental and parkland trees are an important feature of the landscape gardens and parkland of Brockhall Hall. As well as many spinneys and tree belts (see Figure 18), there are numerous individual specimen trees that give the area its parkland character. At the northwest end of the conservation area a number of trees exist along the line of former field boundaries that appear on the 1787 Estate Map indicating that they are of considerable age.

Important individual and groups of trees within the conservation area include, but are not limited to:

Gazewell Spinney and Rectory Spinney create a sense of seclusion as Brockhall is approached from the north. Located on high ground on opposite sides an area of pasture, they also have the effect of channelling views towards the northeast to the countryside beyond the conservation area, terminating at Ashpole Spinney (see Section 7.4, View 6).

Burton Wood, Anson Spinney and the belt of trees between them are situated along much of the southwest boundary of the conservation area, which is immediately adjacent to the M1 motorway. They play an important part in screening views of the

motorway from within the conservation area and reducing noise pollution.

Trees lining either side of the lane approaching Brockhall village from the southeast.

Figure 15: Specimen trees in the parkland to the south of the Hall





Figure 16: Rows of trees either side the lane approaching Brockhall village

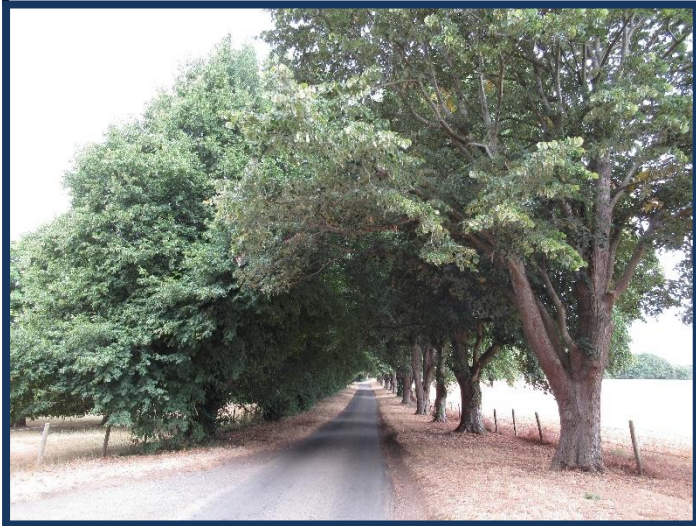
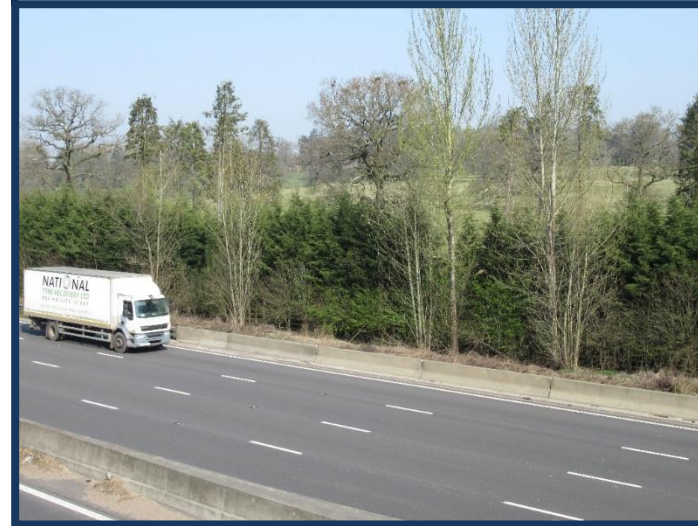
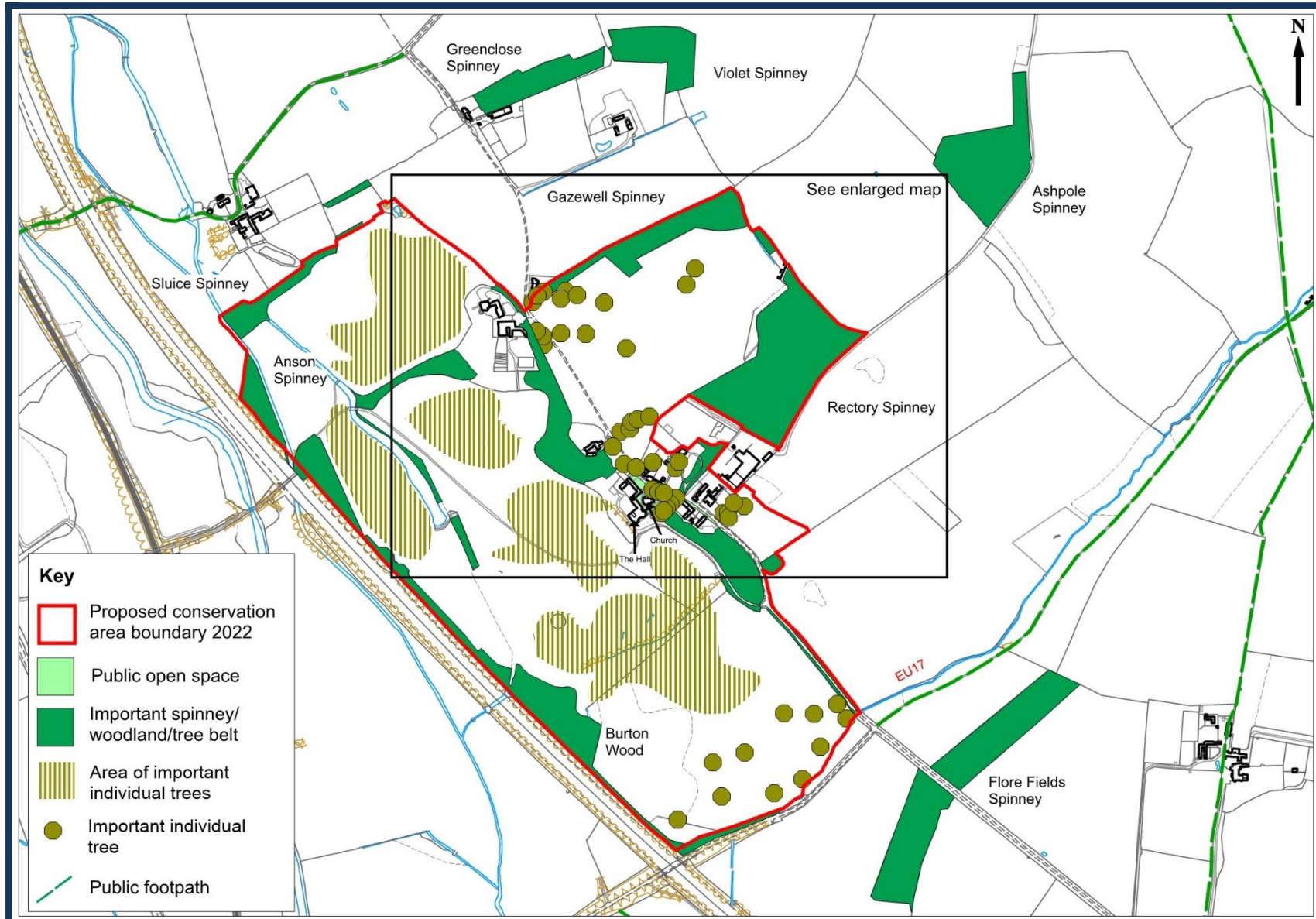


Figure 17: Trees screening the M1 Motorway with the parkland behind



The exclusion of individual or groups of trees from the boundary does not reduce the positive contribution they make to the setting of the conservation area through their historic interest and/or visual amenity.

Figure 18: Map showing important public open space, public footpaths and important trees in and around the edges of the conservation area



## 7.4 Views and Vistas

Views and vistas impact upon and contribute to how the conservation area is experienced, both within the boundary and from outside the designation. Views of the surrounding landscape from Brockhall are also an important consideration for the setting of the conservation area.

As well as the overall contribution of the surrounding landscape, individual features can create particular interest within views.

Within the parkland of Brockhall Hall there are many incidental views. Although they are not identified individually within the appraisal they are no less important for the contribution they make to the parkland and rural character of the conservation area and its setting as well as its visual amenity.

### 7.4.1 Important views within the conservation area:

V1 and V2 provide examples of views looking northwest and southeast as the main road through the village is traversed. These views demonstrate the consistent use of ironstone as the predominant building material and the varying positioning of buildings relative to the road. Views also highlight the variety of building types within the village and their uses.

V3: Looking south across the rectangular green towards the church and The Hall with the thatched cottage, Western Cottage, in the foreground.

V4: Views through the churchyard that take in the church and the Hall and show their close proximity to each other.

V5: Looking northeast from The Gatehouse across the open, unenclosed pasture on the northwest side of the village. This provides a contrast with the narrow and enclosed character of the village itself. Ridge and furrow earthworks are visible on the rising slope to the north.

V6: Views along a shallow valley running up the centre of an area of pasture, channelled by Gazewell Spinney and Rectory Spinney either side, towards the red brick cart shed and terminating in a distant spinney.

V7 Views across the open pasture to the north of Brockhall, taking in the edge of the village as it is approached from the north and the variety of trees.

V8: From the lane there are views of a variety of specimen trees along the east boundary of Brockhall Park. Earthworks immediately adjacent to the trees within the pasture are also visible and may relate to the shrunken medieval settlement.

V9: Looking south from the entrance to the driveway to Brockhall Hall through the parkland with its many trees growing amongst the ridge and furrow earthworks of the earlier medieval open field system. There are also long views from this elevated position to the countryside beyond the park.

V10: Panoramic views across the open pasture showing a variety of specimen trees either side of the road leading to the village to the south.



#### **7.4.2 Important views towards the conservation area:**

V11: There are views into the parkland of Brockhall Hall from the lane on the southeast side of the conservation area. From this location there are views of well-preserved ridge and furrow earthworks and a smattering of individual trees which gives the area its parkland character.

#### **7.4.3 Important views outwards from the conservation area:**

V12 and 13: There are long views from the edge of the conservation area at the entrance to the driveway to Brockhall Hall and just south of Manor Farmhouse that take in the countryside to the northeast. This highlights the gently rolling topography of the surrounding countryside and the rural setting of the conservation area.

Figure 19: Important views within, towards and from the conservation area



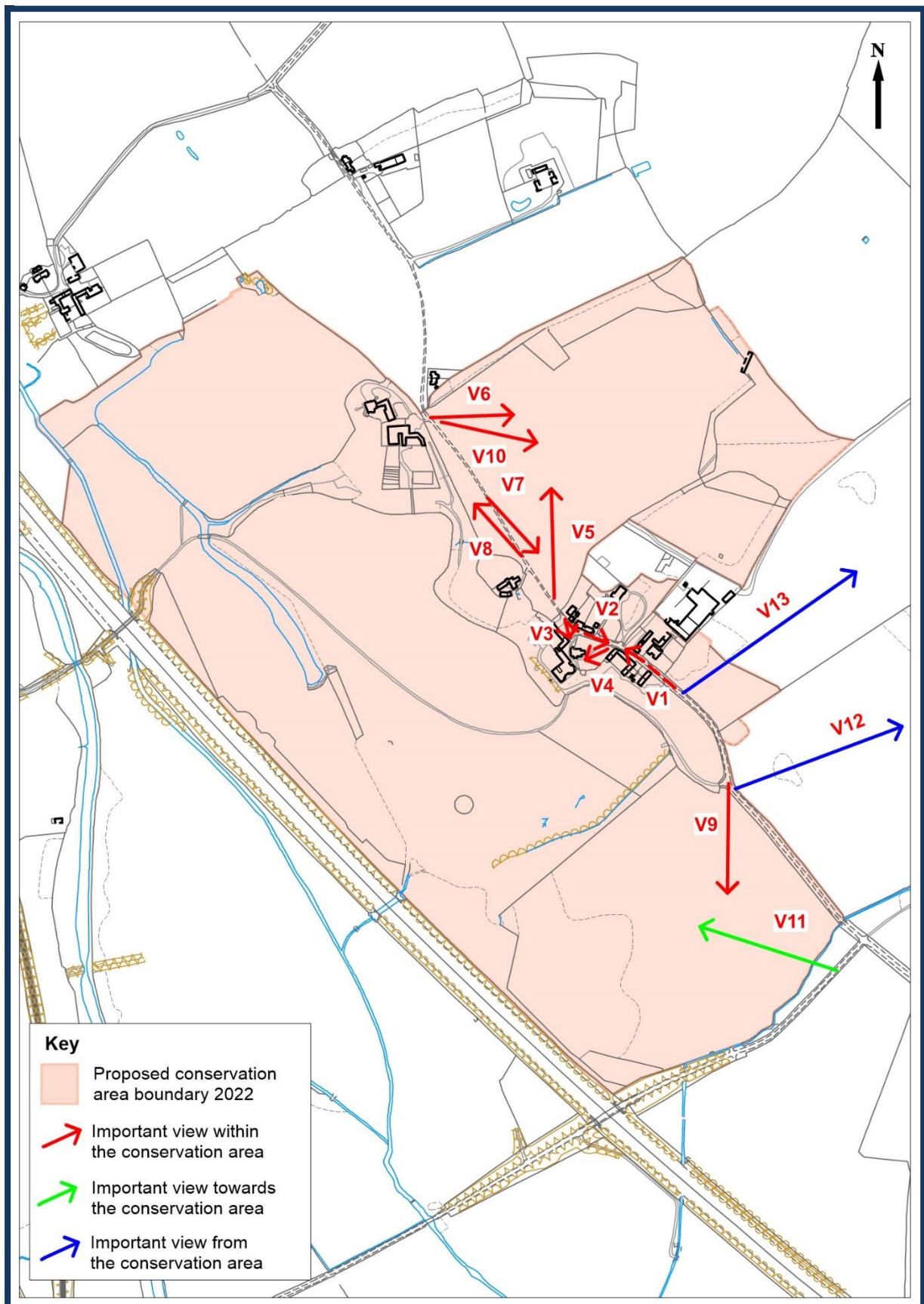








Figure 20: Important views within, towards and from the conservation area





## 7.5 Open Space Analysis

Open space analysis is a method used to assess the contribution of open space to the character and appearance of the conservation area<sup>11</sup>.

The rural nature of the majority of the Daventry area is such that landscape often makes a significant contribution to the character and appearance of conservation areas within it.

In 2016, a methodology for analysing the contribution of landscape within Craven District was formulated by Historic England.<sup>12</sup> This methodology has been employed to assess the contribution of open spaces to the Brockhall Conservation Area.

Open space is defined as common land, farmland, countryside and recreational spaces (including school grounds, churchyards and cemeteries). The analysis considered open space inside and outside the conservation area boundary, where it formed its immediate context.

Fieldwork was combined with an analysis of historic mapping and other secondary sources.

From this, the following factors were taken into account in assessing the contribution of open space to the character and appearance of each Conservation Area:

1. the historical relationship and function of open space
2. its contribution to the form and structure of historical settlements
3. how open space is experienced and viewed from within the boundary of the Conservation Area (for example, there are many long views from within Conservation Areas to the wider landscape that are fundamental to their character and appearance)
4. how the pattern of historic settlements and their relationship to the wider landscape can be understood when looking in from outside (and sometimes at considerable distance, from hills and scarps)

The following categories have been used to assess the contribution of open space to Brockhall Conservation Area and are mapped in Figure 29:

**Purple:** Open space that makes a significant contribution to the character and appearance of the conservation area.

**Pink:** Open space that makes a moderate contribution to the character and appearance of the conservation area.

**Brown:** Open space that makes no or negligible contribution to the character and appearance of the conservation area.

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<sup>11</sup> Alan Baxter Ltd (2016) Craven Conservation Areas Project: Potential Conservation Area Designations August 2016

<sup>12</sup>[https://www.cravenc.gov.uk/media/1818/craven\\_ca\\_appraisals\\_introduction\\_august\\_2016.pdf](https://www.cravenc.gov.uk/media/1818/craven_ca_appraisals_introduction_august_2016.pdf)

Areas of open space that make a significant contribution to the setting of the conservation area may not necessarily be located within its boundary. In some instances, this contrasts with other open spaces that also make a significant contribution and are within the conservation area. This is because these spaces also contain features that contribute to the conservation area's historic character in addition to its setting.

Areas adjacent to the conservation area boundary that are either inaccessible or not visible from a public space at the time of the appraisal have not been included in the Open Space Analysis. This does not preclude the possibility that they make a positive contribution to the setting and/or character of the conservation area.

OS1: An area of open land that makes a **significant** contribution to the character of the conservation area and setting of other designated heritage assets. This is the area of the landscape park of Brockhall Hall, which was laid out to designs of John Webb in the early 19<sup>th</sup> century to picturesque principles that were popular at the time. It is designated as a Registered Park and Garden. It replaced earlier, more formal gardens for which archaeological earthworks survive on the slope below The Hall. An area of the medieval open field system was imparked to create the parkland and ridge and furrow earthworks survive throughout much of it. Today there are many individual and groups of mature trees. Tree belts along the northwest, southwest and southeast boundaries of the conservation area help to shield the parkland from the M1 motorway, which lies immediately to the southwest.

Figure 21: View of Brockhall Park



OS2: A narrow piece of land between the lane to Dodford and Brockhall Park that makes a **significant** contribution to the character and setting of the conservation area. Although this is a small, narrow piece of land it enables views into the southern part of the parkland where well-preserved ridge and furrow earthworks are visible.

Figure 22: Narrow piece of lane between the lane to Dodford and Brockhall Park (OS2)



OS3: The churchyard of St. Peter and St. Paul's Church makes a **significant** contribution to the character of the conservation area and the setting of designated heritage assets, including the listed church, Brockhall Hall, boundary wall and stables, and several chest tombs and grave markers.

Figure 23: The church yard of St. Peter and St. Paul's Church (OS3)





OS4: A small area of pasture to the southeast of Manor Farmhouse that makes a **significant** contribution to the character and setting of the conservation area. It contains ridge and furrow earthworks as well as individual mature trees which gives it a parkland character. This area forms the immediate setting for the Grade II\* listed Manor Farmhouse and enables views of the building as the village is approached along Brockhall Road.

Figure 24: Small area of pasture southeast of Manor Farmhouse (OS4)



OS5: A large area of pasture northeast of Manor Farmhouse that makes a **significant** contribution to the character and setting of the conservation area. There are long views across and through this area of pasture to the open countryside to the east of the village which reinforces its rural character.

Figure 25: Area of pasture east of Manor Farmhouse (OS5)



OS6: A large area of pasture that makes a **significant** contribution to the character and setting of the conservation area. There are well-preserved ridge and furrow earthworks within this area as well as some earthworks that may represent the remains of the medieval settlement of Brockhall. Together, they contribute to the understanding of the development of the village. There are also some individual trees within the pasture that give it a parkland character. This is enhanced by the fact that there are no boundary treatments either side of the lane which passes through the pasture. Belts of trees around the periphery of this area gives it a secluded atmosphere and at the same time enhances the rural character of the conservation area.

Figure 26: Large area of pasture north of Brockhall village (OS6)



OS7: Several areas of pasture that make a **significant** contribution to the setting of the conservation area. Lying immediately to the northwest of the conservation area, is the site of the deserted medieval village of Murcott which survives as a well-preserved earthwork. The site is designated as a scheduled monument. It contributes to the understanding of the development of the landscape in the immediate vicinity of Brockhall and provides a sense of the time-depth of the landscape.

Figure 27: The site of the medieval village of Murcott (OS7)





OS8: A large area of agricultural land divided into a number of fields that lie west of the conservation area and adjacent to the M1 motorway and which make a **significant** contribution to the conservation area's setting. There are some glimpsed views across this open area from the Dodford lane of the parkland. This group of fields enhance the rural setting of the conservation area despite the proximity of the motorway.

OS9: A small rectangular green adjacent to The Mews that makes a **significant** contribution to the character of the conservation area and the setting of other heritage assets. Cartographic evidence<sup>13</sup> suggests that The Green forms part of the historic layout of the village and may at one time have been a larger open area. The space enhances the setting of the Grade II listed buildings of Rose and Western Cottages, as well as the Grade II\* listed church. The Green is identified in Section 7.4 as an important element in views along the main road through the village 9 (see Section 7.4, View 3).

OS10 and OS11: Two areas of agricultural land either side of the lane leading to the conservation area from the north that make a **moderate** contribution to the conservation area. The agricultural land use of these two spaces reinforces the rural character of the conservation area's setting. They are bounded on the western and southern areas by belts of trees. This, coupled with the fact that the land rises gently towards the southeast, creates a sense of anticipation as the conservation area is approached from the north.

OS12: A large agricultural field on the northeast side of Brockhall Road that makes a **moderate** contribution to the character and setting of the conservation area. Although this is an arable field, the parkland character extends into this open space, with a number of individual trees and small woodlands. Metal rail fencing mirrors that on the opposite side of the road that encloses Brockhall Park. There are long and extensive views of the open countryside, reinforcing the rural setting of the conservation area.

Figure 28: Large field northeast of Brockhall Road (OS12)



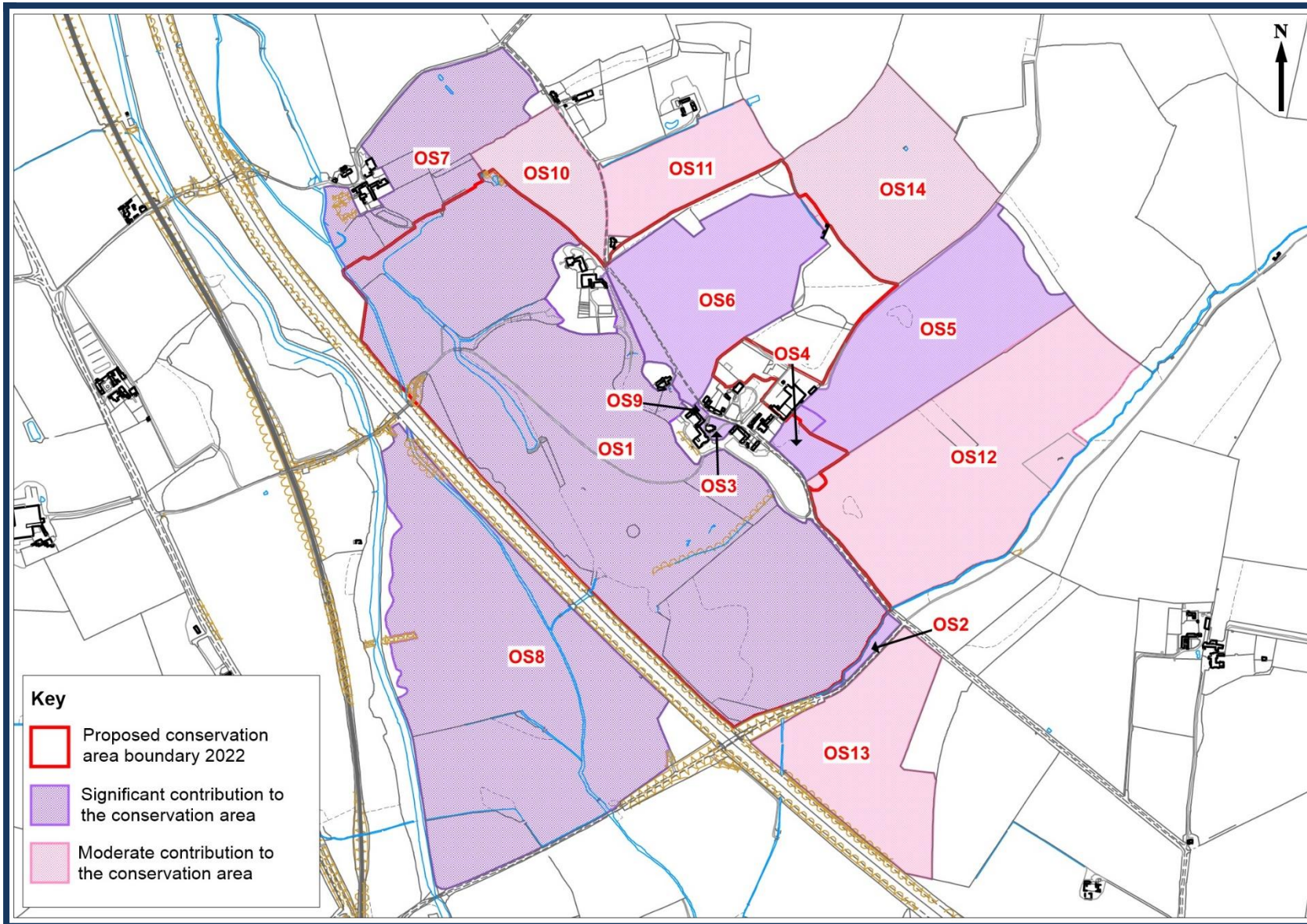
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<sup>13</sup> 1672 Map of the Lordship of Brockhall (NRO Map 1433) and 1787 Plan of the Estate (NRO Map 6382)

OS13: An agricultural field at the southeast end of the conservation area that makes a **moderate** contribution to its character and setting. It enhances the rural character of the landscape in which the conservation area is situated, especially when travelling northeast along the lane away from the M1.

OS14: An area of agricultural land north of Rectory Spinney that makes a **moderate** contribution to the character and setting of the conservation area. There are glimpsed views of this open space from the lane running northwest from the village, which reinforces the rural setting of the conservation area and that of the 19<sup>th</sup> century cart shed located on its western edge.

Figure 29: Map showing the open space analysis for Brockhall





## 7.6 Public Realm and Other Features of Value

The public realm can be defined as the space around and between buildings that are publicly accessible, including streets and open spaces. In addition to the public realm having the potential to contribute to the character, appearance and amenity of the conservation area, it often includes specific features that also make a contribution and should be retained. Positive aspects of the public realm and features of value within the Brockhall Conservation Area include the following:

- The built-in letter box in the front elevation of Rose Cottage which carries the letters 'VR' signifying that it dates to the reign of Queen Victoria (1837-1901)
- Wide roadside grass verges throughout much of the conservation area and a lack of pavements in the village which contribute to its rural character
- There are few road signs, telegraph poles, telecommunications equipment and an absence of street lighting columns, which keeps street clutter to a minimum and enhances the rural character of Brockhall
- Cobbled surfaces outside Western, Rose Cottages, The Gateway and in the yard between Manor Farmhouse and Manor Cottage enhance the historic character of the village
- The rectangular green north of the church that forms part of the historic layout of the village and enhances views towards the church as the village is entered from the north.



Figure 30: Cobbled surface outside Western and Rose Cottages

Figure 31: Wide grass verges within the village



## 8 Architectural Character

Architectural form is a key aspect of the character and appearance of the conservation area. Set out below is a summary of building types and materials; including the characteristics of the form of the built environment within the conservation area; and pictorial examples of common materials, form and detailing, set out in the “palette”.

### 8.1 Building Types and Materials

Buildings within Brockhall Conservation area date mainly to between the 17<sup>th</sup> and 19<sup>th</sup> centuries with the exception of St. Peter and St. Paul’s Church, which dates to between the 13<sup>th</sup> to 15<sup>th</sup> centuries with some alterations and additions carried out in the late 19<sup>th</sup> century.

Ironstone is the predominant building material in the village for both high status and vernacular buildings, although there are two buildings of late 18<sup>th</sup>/early 19<sup>th</sup> century date that are constructed from red brick; The Gatehouse and The Old Rectory. Later additions to the rear of Manor Farmhouse are also constructed from red brick. Most ironstone buildings are constructed from ironstone rubble or squared ironstone with the high-status buildings, such as the church and the Hall being constructed from ashlar. The predominant use of ironstone gives the village its coherent character.

Most of the buildings are now in domestic use but there quite a variety of building types due to there being some buildings of

higher status, ancillary buildings that served the Hall and those buildings of a more vernacular character.

The higher status buildings stand out in the village due their larger scale and detailing. Manor Farmhouse, for example, has features such as stone mullion windows with leaded lights in its southeast and southwest-facing elevations, stone-moulded string courses between floors, and stone coping and kneelers to the gables. At The Old Rectory the building has large sash windows of nine or twelve lights with stone sills. At the main entrance there is a portico with a moulded cornice supported by classical columns. Both buildings stand in generous plots of land.

Brockhall Hall is another high-status building, albeit on a level above that of any other building in the conservation area. It displays features such as a six-panel double-leaf door in moulded stone architrave with a plain frieze and cornice on tapering pendant supports. The building has string courses between each floor. It also has arched stone mullioned and transomed windows with leaded lights on the southeast and southwest-facing elevations but Gothic arched windows with sashes on the northwest-facing elevation. There is also a Gothic arch doorway in this elevation. Above the third floor there are stone coped parapets with truncated pinnacles at each corner.

Elsewhere in the conservation area vernacular buildings are much simpler in terms of detailing with most having timber lintels above doors and windows, which tend to be casements.

There are several buildings that formerly served the Hall which have subsequently been converted to dwellings but which retain



their original features, windows and door openings, which make their original functions easily recognisable. One such building is The Stables, which has retained its U-shaped plan around three sides of a courtyard. It has also retained many aspects of architectural detailing. For example, the central block has four segmental-headed, 18-panel double-leaf coach house doors in the central block with 12-pane sash windows at either end and 9-panel doors, each with overlights, at either end. The return wings have similar doors and windows arranged symmetrically and a string course above which there is a row of lunettes, some of which are infilled with ironstone ashlar.

The central pavilion has arched windows and a dentilled pediment with a clock face in a moulded stone frame and square surround. The roof above has a square timber cupola with open round-headed arches on octagonal columns and ogee lead roof.

Roofing materials vary throughout the conservation area. Several of the older vernacular buildings have retained their thatch, namely Western and Rose Cottages. Manor Farmhouse has orange/red clay tiles and there is one example of an outbuilding that has a corrugated iron roof. Both the church and Brockhall Hall have leaded roofs. Most other buildings use blue/grey slates with the roof of the former stables to Brockhall Hall utilizing some paler slates to create a zig-zag pattern along the length of the roof.

Figure 32: The Stables viewed from the south. (Source: Geograph Britain and Ireland, © Burgess Von Thunen)



Another building that had a former use that has now been converted to a residential dwelling is the barn and stable at Manor Farm. The northwest elevation retains its original ventilation openings at the east end of the building. In addition, the large rectangular opening, giving access from the northwest side right underneath the building and through to the cobbled yard on the other side, remains. Both these features make the building's former use as an agricultural barn easily recognisable.

Figure 33: Buildings in Brockhall, typical of materials, detailing and scale





## 8.2 Scale and Massing

There is a range of building sizes within the conservation area. Brockhall Hall has three storeys, as does Manor Farmhouse, with the third storey utilising the attic space in the latter example. This is also the case with Manor Farm Cottage. Elsewhere, buildings tend to be of two storeys with the older vernacular cottages having half-dormers to accommodate the upper floor. Several buildings converted for residential use have wings that are single storey, such as The Mews and the Stables.

Predictably, higher status buildings are larger in plan, particularly Brockhall Hall. The majority of buildings are situated in close proximity to each other within the nucleus of the village. The Old Rectory is an exception to this. It is situated some distance back from the road in spacious grounds. Its gardens are immediately adjacent to the road and directly opposite the churchyard and, together with the green, this creates a sense of openness in the centre of the village. The Old Dairy and The Grange lie some distance from the village.

Although The Hall is also set back from the road, it is very close to the church and still in relatively close proximity to other buildings in the village. This is somewhat unusual, with most high-status buildings with their own parkland usually located some distance from the village that serves it.

The positioning of buildings relative to the road varies throughout the village. On the east side of the road Western Cottage, Rose Cottage and Manor Farm Cottage are all adjacent to it, whilst the Gatehouse and Manor Farmhouse are set back from it. On the west

side of the road only The Stables is positioned immediately adjacent to the road. Buildings on this side tend to stand with their rear or side elevations next to the road, partly due to the fact that many of them are former buildings that served the Hall, they are arranged around courtyards and access to them was from the west.

A similar arrangement exists on the east side of the road where Manor Farm Cottage stands with its rear elevation next to the road and the former agricultural barn stands immediately behind along the north side of a cobbled yard.

Figure 34: Buildings at the south end of the village, showing the variety of orientations relative to the road



### 8.3 Boundary Treatments

Tall stone walls, constructed from squared ironstone or ironstone rubble and with flat coping stones, are a common boundary treatment within the conservation area and make an important contribution to its character. Together with the buildings they form a coherent grouping of ironstone structures. Those walls that are situated adjacent to the road help to channel views through the village and they also add to a sense of seclusion.

The wall that runs between the southeast corner of the Hall and the northwest corner of The Stables is another tall ironstone wall that is crenelated. Dating to c. 1800, it is Grade II listed.

Elsewhere, metal railings are the other main type of boundary treatment. Two different designs can be seen in the conservation area; estate fencing with horizontal rails and those with vertical bars. They are used to form the boundary of Brockhall Park, particularly for significant lengths of its east side. Two enclosed fields to the east of the park and south of the village also partially use estate fencing. These boundary treatments contribute to the parkland character.

There are also several hedge boundaries in the village that enhance its rural character and soften the built environment. Two examples are the boundary around the garden of the Old Rectory, the west side of which is adjacent to the road; and that which encloses the northwest side of the garden at the Gatehouse and is visible as the village is approached from the north. Trees within hedges, or trees marking former hedge lines also exist and define the strong rural character of the village and the estate.

Figure 35: Ironstone boundary wall



Figure 36: Listed crenelated wall between the Hall and Stables



Figure 37: Metal rail estate fencing

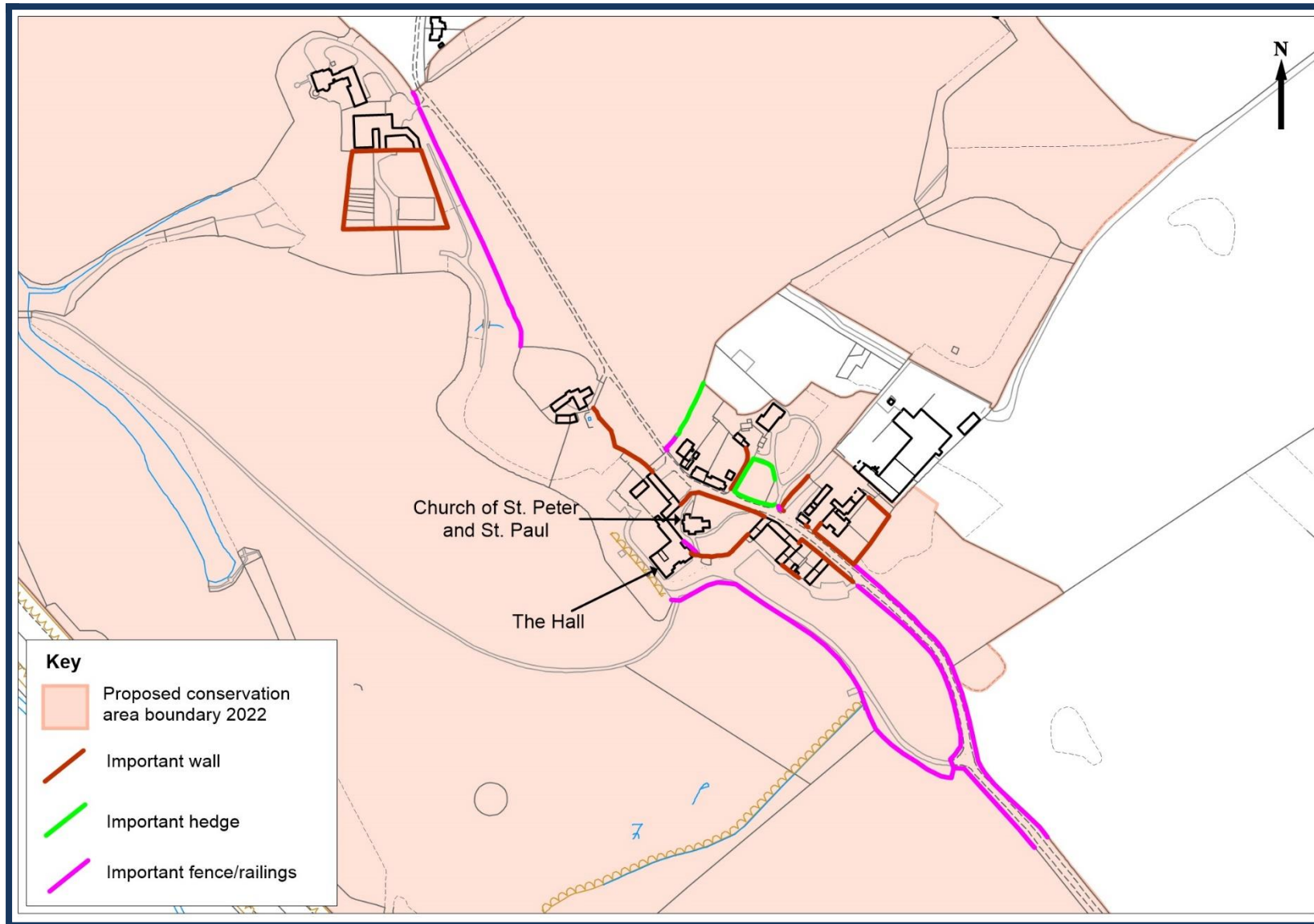


Figure 38: Vertical bar railings





Figure 39: Important boundary treatments in the conservation area



## 8.4 Loss of Character

Incremental alterations to historic buildings and the public realm, or larger scale development within a conservation area, can have a detrimental effect on its historic character and integrity.

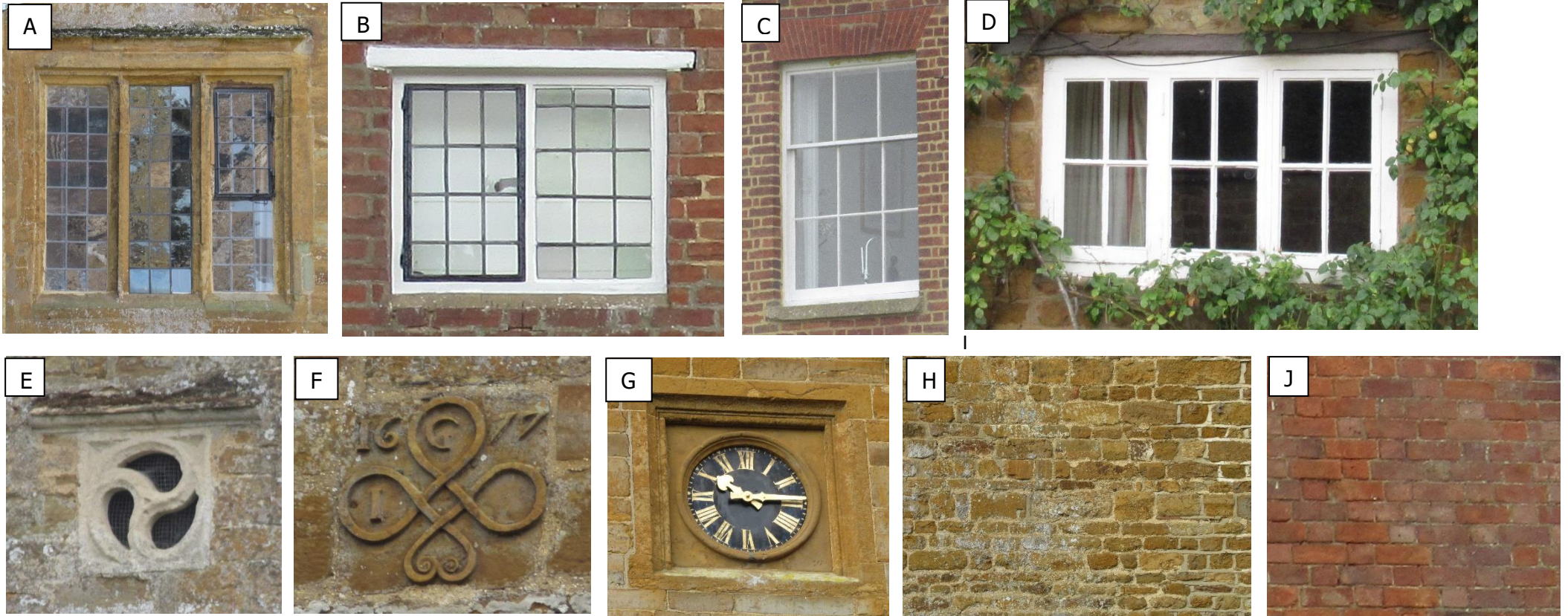
In Brockhall Conservation Area there are some instances where alterations or developments have resulted in a loss of character.

There is an example where historic timber or metal window frames have been replaced with uPVC frames. This is detrimental to the visual appearance of historic buildings and the wider street scene because the style of windows is often not in keeping with the date of the building and uPVC windows have thick frames. Replacement with uPVC frames also equates to a loss of the building's historic fabric. This is also true of changes to lintels and sills. There are also examples of replacement timber windows being of inappropriate design, which have elements of traditional sash windows but with thicker glazing bars and top opening casements.

Not only can the replacement of building fabric and the use of inappropriate materials and styles have a detrimental effect on historic character but additions to buildings can also have this effect. In Brockhall the addition of sky lights to several buildings also detracts from the historic character of these buildings.

## 8.5 Palette

Figure 40: A selection of images showing typical materials, surfaces, boundary treatments and fixtures which form a representative palette within the Brockhall Conservation Area.









## 9 Design Guidance

Advice should always be sought from West Northamptonshire Council before commencing any works. The following policies set out key design principles. A Design Guide for Northamptonshire has been produced by CPRE which provides useful advice<sup>14</sup>.

### 9.1 Alterations and Extensions

There will be a presumption against proposals for alterations and extensions which adversely affect the character of the conservation area or its setting. Alterations and extensions should be sympathetic to the character of the building in terms of proportions, scale, materials, and detailing. New development, including extensions, should respect the appropriate pattern of historic plot formation.

### 9.2 Scale

Additions to existing buildings or new development will generally not exceed two storeys, and the ridge line should respect the ridge line of adjacent buildings.

Ridge lines are typically varied across the conservation area, and new development should seek to be sympathetic to this style. The open spaces between buildings within the centre of the village give it a more spacious character. Development within these open spaces should be resisted.

There is some variation in the positioning of buildings relative to the road with some having their principal elevation facing the highway whilst others stand gable end-on. Some are set back from the street frontage but other area immediately adjacent to it. New development should respect these types of variation and where possible reflect this aspect of the conservation area's spatial character.

New development should not impede important views through, from or towards the conservation area, including those of St. Mary's Church and Brockhall House.

### 9.3 Materials

Ironstone and Welsh slate are the predominant building materials in Brockhall but there are also examples of buildings that have used red brick, thatch and clay tiles. These various materials greatly contribute to the area's character and development must be sensitively designed with this in mind.

Cobbled areas in the yard between Manor Farmhouse and the barn, and outside Western and Rose Cottages (see Section 8.4, photograph R), enhance the village's historic character. These features should be maintained and repaired with appropriate materials.

See Section 8.4, photographs H - M for examples of typical materials used within the conservation area.

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<sup>14</sup> <https://www.cprenorthants.org.uk/media/pdf/cpre-ncdg.pdf>

Rendering and painting of external walls can detract from the visual amenity and uniformity of the street scenes and should be avoided. Exterior walls should not be clad, painted or rendered.

Masonry paints are often not acceptable for use on buildings which pre-date 1919 as they can have a damaging effect on stone and brickwork. In these cases it is more appropriate to use a lime-based render or lime wash.

Pointing on historic buildings should be subservient and done using an appropriate grade of lime mortar, avoiding ribbon or strap style.

#### **9.4 Detailing**

Most vernacular historic buildings in Brockhall have timber lintels above windows and a small number have stone mullion windows (see Section 8.4, photographs A, B and D). Stone hood moulding above windows is used at Manor Farmhouse and Manor Farm Cottage. Above the windows at The Stables there are lunettes. These buildings also have stone kneelers and stone coping to the gables (Section 8.4, photograph N) and Manor Farmhouse has a date stone on its front elevation.

More elaborate detailing is usually reserved for the larger, higher status buildings. For example, Brockhall Hall has a stone string course between floors, and stone coped parapets with truncated pinnacles.

The features mentioned above contribute to the character of Brockhall and should be retained. New development should use appropriate designs in order to be sympathetic to the existing form

within the conservation area with the careful use of detailing according to status.

#### **9.5 Windows**

There is a variety of historic window styles within the conservation area including stone mullion windows with leaded lights (Section 8.4, photograph A). Vernacular buildings also have timber casement windows with narrow glazing bars with timber lintels above (photograph B and D). At Brockhall Hall there is a variety of window types including canted bay windows, arched windows with stone mullions and transoms and leaded lights, and Gothic arched windows with timber sash windows. The Old Rectory also has large timber sash windows.

These different styles enhance the historic character of the individual buildings and aid interpretation of the village's architectural development.

Traditional windows and window openings should be retained, maintained and repaired as far as possible. Dormer windows and roof lights are generally not acceptable on the front elevations of historic properties and if used on rear elevations should be designed so that they are in proportion with the building and do not dominate the roof slope. Roof lights should be fitted flush to the roof line.

If replacement of traditional windows is necessary, they should be:

- Sensitive to the original style

- Generally, either stone mullion, timber sash or metal or timber double casement
- If painted, window frames should be either white or where possible a relevant sensitive colour based on the originals
- Original brick, stone and timber lintels should be retained and every care taken not to damage them if the windows are being replaced
- If it is necessary to replace lintels, replacements should be like-for-like in terms of their design and materials
- UPVC is generally not an appropriate material for use in an historic property.

## 9.6 Doors and Porches

Traditional doors within the conservation area tend to be of timber plank style, with timber lintels above, or timber panelled doors (Section 8.4, photographs O and P). Manor Farmhouse has a stone four-pointed arch door surround (photograph Q).

Former non-domestic buildings, such as The Stables have wide door openings with segmental arched stone lintels. These openings add to the non-domestic character of the building and should be retained.

Porches are not a common feature in the conservation area although there are several exceptions. Manor Farmhouse has a canopy porch and the Gatehouse has a shallow brick-built porch with a four-pointed arch opening and pitched, slate roof (photograph P). The entrance to The Old Rectory takes the form of a portico with Doric pillars.

There will be a presumption against uPVC as a material for doors. Porches should not detract from or overwhelm the visual amenity of the relevant building elevation or the uniformity of the street scene, and be appropriately proportioned and scaled.

## 9.7 Roofing

The predominant roofing material for historic buildings within the conservation area is Welsh slate, although Manor Farmhouse has clay tiles and the Hall has a leaded roof. Just two cottages have retained their thatched roofs. (see Section 8.4, photographs K-N for typical roofing materials). Roofing at the The Stables incorporates a decorative zig-zag pattern of paler slates. Welsh slate has a distinctive quality and finish. It has a matt surface and a muted grey colouring with blue and/or purple tones. Alternatives often have a darker grey/black colour and a shiny finish, which results in a very different appearance. Traditional roofing materials such as Welsh slate, clay tiles and thatch should be retained wherever possible.

Ridgelines should be carefully designed so as not to obscure views of historic buildings or surrounding countryside. Modern development should seek to sit subservient to historic properties rather than dominating them.

## 9.8 Setting

There will be a presumption against developments which negatively affect the setting of the conservation area, particularly if they affect views into, out of and through the conservation area. The M1 motorway, which runs along the southwest edge of the

conservation area, has a negative visual impact as well as being a source of noise pollution. Any development along the motorway corridor in the vicinity of the conservation area that would further this negative impact should be avoided.

The location of Brockhall towards the summit of a south-west facing slope provides long panoramic views particularly to the south west, southeast and east, through the parkland to the surrounding countryside at the south end of the conservation area.

Where possible, the open spaces that enable these views and the wider rural setting of the village should be retained. Development should not detract from the built form of the village or from both long and short views of key buildings.

It is recognised that Brockhall is a working agricultural estate that is managed for arable and livestock farming purposes.

## **9.9 Trees**

The conservation area is well furnished with trees of differing varieties, including parkland trees, specimen trees, spinneys and shelter belts. They contribute to the amenity of the village and its rural character as well as the character of the designed landscape parkland. Important trees should be replaced where felling takes place, in order to conserve the green setting and amenity of the conservation area.

The many trees within the conservation area, and particularly those along its west, north and southern boundaries help to reduce the negative impacts of the motorway when inside the conservation

area and they should be retained, actively managed and enhanced where appropriate.

Trees and woodlands on the Estate should be managed in accordance with a comprehensive and up to date management plan. Sustainable management of trees and woodlands, which may include periodic felling and replanting with appropriate species, will sustaining and, where appropriate enhance the historic, landscape and wildlife value of these important features.

Where replanting or new planting takes place regard should be given to the impact on both upstanding and buried archaeological remains. Professional advice should be sought and appropriate assessment undertaken to assess the extent and significance of any remains which may be affected.

## **9.10 Public Realm**

The public realm should enhance the character of the conservation area. Signage and street furniture should not detract from the visual amenity of the street scape; their design should be sympathetic and number kept to a minimum in order to avoid clutter whilst properly taking account of public safety.

Public realm features that make a positive contribution to the character and amenity of the conservation area should be maintained. In Brockhall this includes the wall-mounted letterbox at Rose Cottage and the wide grass verges and the green. Minimal signage within the village is also a positive characteristic that should be maintained.



Satellite dishes should not be placed on the principal elevations of buildings, as they serve to detract from the visual amenity of the conservation area. Furthermore, external wiring should not be taken across the frontage of a building; or, where unavoidable, should be consolidated and kept tidy so as not to affect the visual amenity of the building or streetscape.

Any new development should seek to ensure that measures are taken so that large waste bins are not visible to the street, including back land.

There are wide grass verges and no pavements throughout much of the village. The verges are not delineated by kerb stones, which gives them an informal character and this contributes to the rural character of the village. Formalising the edges of grass verges with kerb stones or introducing pavements should be resisted.

### **9.11 Development and Built Form**

Any future development should aim to enhance the character of the conservation area.

Any new built form should be concentrated within the existing village. It should balance current highway standards with the historic character of the conservation area with regards to road widths, the number and widths of pavements, surfacing, street lighting and signage.

Unless there are opportunities for the sympathetic re-use of existing buildings, for example traditional/historic buildings, new development in the open countryside should be avoided. Should

there be reuse of traditional/historic buildings, careful consideration must be given to issues such as vehicular and pedestrian access and the urbanising influence of highway requirements.

Any new built form should be small-scale and incorporate a mix of building types i.e. detached or semi-detached, to reflect those types seen in Brockhall. Buildings and their layout should be designed in such a way as to create varied rooflines.

Future development should respect the plot size, layout and building alignments that characterise the particular part of the conservation area where development is proposed. For example, plots tend to be relatively small at The Stables in comparison to other residential buildings elsewhere in the conservation area. Infill development in the open spaces within the village, which form part of its rural, peaceful character, should be resisted.

Individual buildings should be designed to reflect the building materials and detailing evident within the conservation area, for example, stone hood moulding above windows, timber lintels or stone arched lintels; the use of ironstone for individual buildings; appropriately designed doors, door surrounds, windows and porches. Roof materials should closely match Welsh slate, which is the predominant roofing material in the conservation area.

Development which involves below-ground excavation should have regard to the potential for remains of archaeological interest. Professional advice should be sought and appropriate assessment undertaken to assess the extent and significance of any remains which may be affected by proposals.

## 10 Opportunities for Enhancement

### 10.1 Local List

Certain buildings, structures and sites make a particular positive contribution to the character and appearance of the conservation area or its setting and are therefore worthy of recognition in the planning process.

In response to this, West Northamptonshire Council is producing a "Local List" of locally special buildings, structures or sites, which provides those assets included on the list with appropriate consideration. The Local List differs from statutory "Listed Buildings" in that an asset's inclusion on the Local List does not confer any further planning controls. Rather, being included on the Local List provides weight to the asset's retention, should it be at risk.

Local List candidates are judged by criteria assessing their age; condition and quality; rarity; group value; and historic associations.

Entries on the Local List within Brockhall are as follows:

East and West Cottage, Muscott, a terrace of late 19<sup>th</sup> century cottages built from red brick with clay roof tiles. The cottages, which were probably built as estate cottages, are divided into four dwelling. They display decorative elements in the Arts and Crafts style of this period. Blue bricks are used in the arched lintels above windows and doors, as well as window sills. The building has decorative timber barge boards and terracotta ridge tiles. Each doorway has a canopy porch with timber brackets either side

supported by stone corbels. The doors themselves are of solid timber. To the rear of the cottages there are outbuildings, probably originally built as wash houses, which also display some detailing to match the cottages, for example the decorative terracotta ridge tiles. The cottages are a good example of late 19<sup>th</sup> century estate cottages that retain many features of their original design.

### 10.1.1 Images of local list candidates

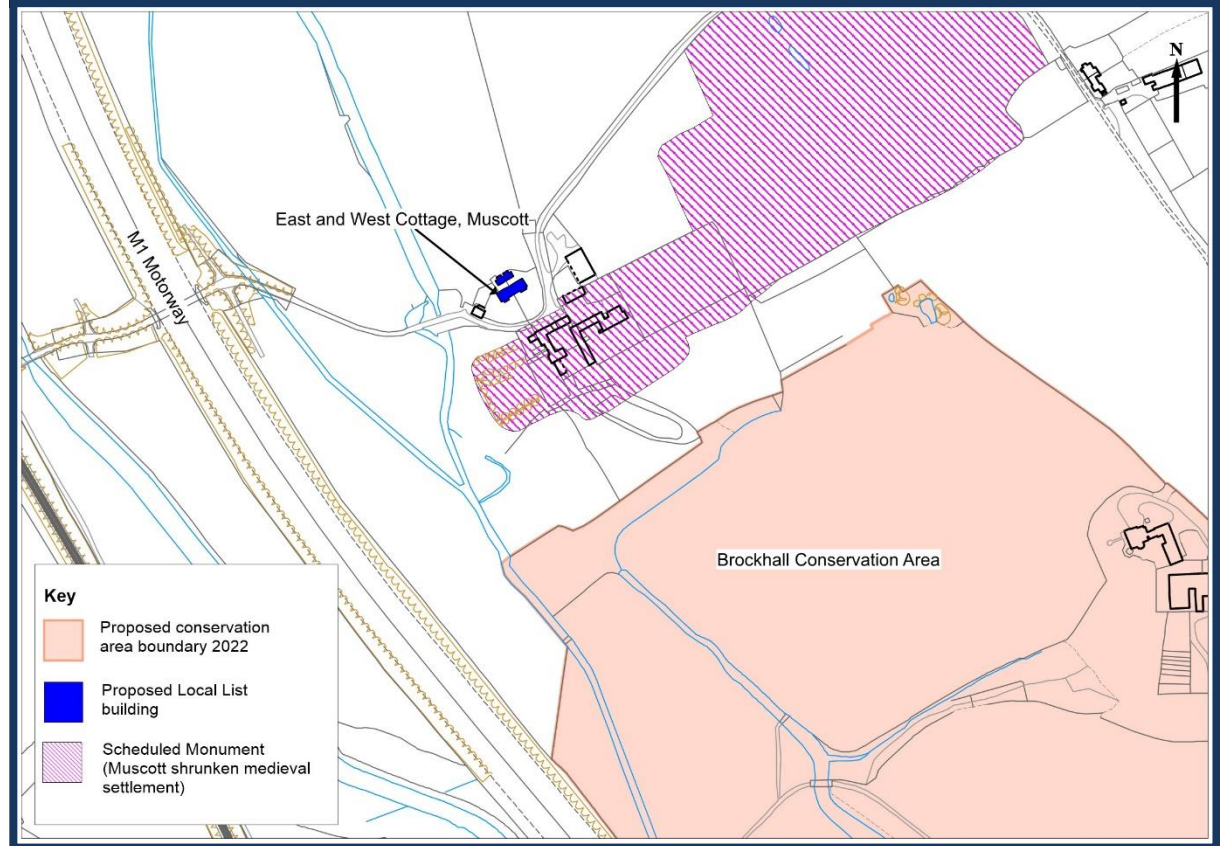
Figure 41: West Cottage, Muscott



Figure 42: East and West Cottage, Muscott



Figure 43: Buildings proposed for local listing



## 10.2 Article 4 Directions

Certain “permitted development” rights are automatically withdrawn as the result of conservation area designation, meaning that planning permission is normally required to undertake particular works (see Section 2.3). However, many works, such as the replacement of windows, doors or the painting of the exterior of a property are not controlled through conservation area designation and remain permitted development. Over time, these works can have a significant effect on the character and appearance of a conservation area which may cause harm to its special interest. In order to preserve the character of a conservation area the council may choose to remove certain permitted development rights through the placement of an **Article 4(1) Direction**. The result of an Article 4(1) Direction is that permitted development rights are withdrawn and planning permission is required to undertake certain works.

The placement of an Article 4(1) Direction is a separate process to conservation area designation. Certain Article 4(1) Directions are being explored as the result of this appraisal and are detailed below.

Subject to the outcome of the consultation on this appraisal, detailed proposals will be prepared and further consultation, including directly with the properties concerned, will be undertaken.



<b>Permitted Development Rights to be withdrawn</b>	<b>Location</b>
Alteration or replacement of windows and doors	The Dairy, 1 The Coach House, 2 The Coach House, Brockhall Road
Replacement or alterations to roofing	The Dairy, 1 The Coach House, 2 The Coach House, Brockhall Road
Alteration or addition of roof lights or sky lights	The Dairy, 1 The Coach House, 2 The Coach House, Brockhall Road
Alteration or replacement of cobbled surfaces	The Dairy, 1 The Coach House, 2 The Coach House, Manor Farmhouse, Manor Farm Cottage, Brockhall Road
Construction, demolition or alteration of walls, gates or fences	The Dairy, 1 The Coach House, 2 The Coach House, Brockhall Road

### **10.3 Public Realm Enhancements**

Specific aspects of the public realm within Brockhall were reviewed to assess whether they currently detract from the character and appearance of the conservation area and would benefit from sensitive redesign in the future. No aspects of the public realm were identified that require sensitive redesign.

## 11 Management Plan

Local planning authorities have a duty placed on them under Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to draw up and publish proposals for the preservation or enhancement of conservation areas.

Conservation area appraisals undertaken within the Daventry area help to identify threats to the character of the conservation area and opportunities for enhancement, which can then be developed into Management Plans which seek to address these issues through recommendations.

The following threats to the character and appearance of the Brockhall Conservation Area have been identified through the appraisal. Each Threat is accompanied by a Recommendation which should be used to guide future management and address key issues.

### 11.1 Threats and Recommendations

#### 11.1.1 Threat 1: Inappropriate development

Piecemeal and large-scale development, both on the fringes of the village as well as within the conservation area boundary, has the potential to harm the character of the conservation area as well as its setting. Development has led to the erosion of some historic character (see Section 8.4 – Loss of Character), the gradual effect of which is a threat to the general character and appearance of the conservation area.

**Recommendation 1:** Development proposals should have regard to the established form, scale, design and materials used within the conservation area as highlighted in this appraisal and other planning documents. Development should preserve and enhance the character of the local vernacular.

Loss of walling, fencing and hedges that have been identified as making a positive contribution to the character and appearance of the conservation area should be avoided.

There are important long, panoramic views of the rural landscape from within the landscape park and gardens of Brockhall House, and from the lanes approaching the village from both the north and south. Views along Brockhall's lanes are also an important contributor to the historic character of the village. Development that interrupts or detracts from these views would be detrimental to the character and amenity of the conservation area and should be resisted.

#### 11.1.2 Threat 2: Threat to the character and appearance of the conservation area through the loss of traditional features of value

The character of Brockhall is greatly enhanced by the presence of traditional architecture and the survival and maintenance of historic features of value, such as historic open spaces and vernacular buildings, which directly contribute to its historic interest and significance. A review of the village has identified some threats to traditional features and historic fabric, such as the replacement of traditional fenestration with modern UPVC counterparts, loss of original lintels and addition of skylights (see Section 8.4). The

piecemeal loss of traditional features that contribute to the historic or architectural interest of the conservation area forms a threat to its overall character and appearance and should be discouraged.

Individual buildings and structures that make a positive contribution through their architectural or social value are also at risk from gradual or wholesale loss. These buildings and structures may be deemed non-designated heritage assets (neither listed nor scheduled); the loss of these assets forms a significant threat to the character and appearance of the conservation area.

**Recommendation 2:** Development proposals should have regard to the design principles set out in Section 9 of this document in order to preserve the architectural interest of the conservation area. Through the appraisal process, the council will explore the use of Article 4 Directions which remove permitted development rights, in order to preserve or enhance the character and appearance of the conservation area. See Section 10.2 of the appraisal for more details.

Work to listed buildings will require consent in most cases.

Heritage assets which make a particular contribution to the character and appearance of the conservation area will be recognised through the Local List. Recognising the contribution made by these assets allows them to be appropriately preserved and re-used, securing their long-term future. The Council will seek to adopt and maintain a Local List of local special buildings and structures for Brockhall. Once adopted a Local List becomes a material consideration in the determination of planning decisions. See Section 10.1 of the appraisal for more details.

### **11.1.3 Threat 3: Impact on Trees**

Trees make an important contribution to the character of Brockhall. They form an important aspect of views within and towards the conservation area and they are an especially important feature of the Registered Park and Garden of Brockhall Hall. Trees help to soften views of the built environment and are especially important in screening the M1 motorway. They contribute to Brockhall's rural character. There currently no individual tree preservation orders or tree preservation order areas within the conservation area. Inappropriate or incremental loss of important trees risks harming the character and setting of the conservation area.

Recommendation 3: Under Section 211 of the Town and Country Planning Act 1990 permissions are required to carry out works to trees over a certain size within a conservation area. This includes topping, lopping, pruning and felling.

Development proposals should have regard for the contribution of trees throughout the conservation area as well as their effect on its setting.

Where individual or groups of trees are considered to be at risk of damage or loss the council will consider of the introduction of a Tree Preservation Order.

### **11.1.4 Threat 4: Impact on archaeology**

Brockhall has been inhabited for many centuries. It is recognised that evidence for past occupation survives as both extant and buried archaeological remains within the modern settlement and on its fringes (see Section 7.2).



In addition to the medieval settlement earthworks and earthworks relating to the 18<sup>th</sup> century landscape gardens, the area has the potential to yield further archaeology which would enhance our understanding of its development and the development of the wider landscape. Development proposals have the potential to have a detrimental impact on these remains, which forms a threat to the historic interest and subsequent character and appearance of the conservation area.

Recommendation 4: Development which involves below-ground excavation should have regard to the potential for remains of archaeological interest. Professional advice should be sought and appropriate assessment undertaken to assess the extent and significance of any remains which may be affected by proposals.

#### **11.1.5 Threat 5: Highways**

The potential loss of historic fabric, introduction of modern surfacing, boundary treatments and signage, and delineating verges and green spaces with kerbs, as the result of highways development forms a threat to the character and appearance of the conservation area.

Development that involves alterations to highways, footways and signage can have a dramatic impact on the character and appearance of the conservation area. The nature of narrow and secluded lanes and street pattern, often lined with hedgerows, stone walls and estate fencing, forms an important aspect of the special interest of the conservation area. Historic and traditional materials make a special contribution to this character and can easily be lost.

Furthermore, future development proposals could lead to an increase in traffic which could have a significant effect on the quiet character of the conservation area, as well as the physical fabric of buildings and structures that lie close to the highway.

Recommendation 5: The highways authority, Northamptonshire Highways, should as far as possible, seek to ensure that works to highways and footways do not negatively detract from the character and appearance of the conservation area.

The introduction of kerb stones between the edge of verges and the highway would result in a loss to the rural character of the conservation area and should be resisted.

Development proposals should have regard to the impact of modern highways standards, traffic levels, signage and parking provision on the historic environment.

#### **11.1.6 Threat 6: Public Realm**

The condition of the public realm has a great effect on the quality of the conservation area. Poor maintenance of the public realm, and street clutter could detract from the character of the conservation area.

**Recommendation 6:** Street furniture within the conservation area is minimal. Where possible street furniture should be consolidated and kept to a minimum in order to prevent cluttering of the street space. New or replacement telecommunications facilities and other utilities should be minimised and sensitively placed. Street furniture should be maintained to a high standard by all stakeholders. Good

design of new street furniture or that which is being replaced should be encouraged to enhance the conservation area.

Proposals should take the opportunity to enhance the character and appearance of the conservation area by using designs and materials appropriate to the historic character and appearance of the conservation area.

## Sources

Department of Housing, Communities and Local Government (2021)  
National Planning Policy Framework

Historic England (2019) Conservation Area Designation, Appraisal  
and Management

Historic England (2016) Local Heritage Listing

Historic England (2008) Conservation Principles, Policies and  
Guidance

Historic England (2017) The Setting of Heritage Assets: Historic  
Environment Good Practice Advice in Planning 3

Northamptonshire Green Infrastructure Suite

Northamptonshire Record Office

Northamptonshire Historic Environment Record

History and Antiquities of the County of Northampton, Volume II,  
Baker, G. (1841)

Royal Commission for Historic Monuments (1981) An Inventory of  
Historical Monuments in the County of Northampton, Vol. III:  
Archaeological Sites in North-West Northamptonshire, Her Majesty's  
Stationary Office: London.

## Internet Sources

[Magic Map Application \(defra.gov.uk\)](https://defra.gov.uk)

[Home | Domesday Book \(opendomesday.org\)](https://opendomesday.org)

[Northamptonshire's Environmental Character & Green Infrastructure  
Suite \(rnrepenvironmentalcharacter.org.uk\)](https://rnrepenvironmentalcharacter.org.uk)

## Further Information and Contact Details

Information regarding conservation areas can be found on our  
website at:

[Conservation areas | West Northamptonshire Council  
\(westnorthants.gov.uk\)](https://westnorthants.gov.uk)

Information regarding local history can be found at the  
Northamptonshire Record Office or Northamptonshire Libraries.

For advice relating to development within conservation areas,  
please contact the council's Development Management department  
via

Email: [planning.ddc@westnorthants.gov.uk](mailto:planning.ddc@westnorthants.gov.uk) or

Telephone: 0300 126 7000.

Information and advice for those living and working within  
conservation areas can also be found on the Historic England  
website at:

[Living in a Conservation Area | Historic England](https://historicengland.org.uk)

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## Appendix A: Listed Buildings and Registered Park and Garden

List Entry Number: 10372016

Name: Bridge over lake in Brockhall Park

Grade: II

National Heritage List for England web page: [BRIDGE OVER LAKE IN BROCKHALL PARK, Brockhall - 1372016 | Historic England](#)



List Entry Number: 107650

Name: Icehouse approximately 0.5 kilometres northeast of the hall, Brockhall

Grade: II

National Heritage List for England: [ICEHOUSE APPROXIMATELY 0.5 KILOMETRES NORTH EAST OF THE HALL, BROCKHALL, Norton - 1076506 | Historic England](#)

List Entry Number: 1075244

Name: The Gate House

Grade: II

National Heritage List for England web page: [THE GATE HOUSE, Brockhall - 1075244 | Historic England](#)



List Entry Number: 1045922

Name: Manor Farm, Barn and Stable

Grade: II

National Heritage List for England web page: [MANOR FARM, BARN AND STABLE, Brockhall - 1045922 | Historic England](https://www.gov.uk/heritage-list/buildings/manor-farm-barn-and-stable-brockhall)



List Entry Number: 1045891

Name: The Old Rectory

Grade: II

National Heritage List for England web page: [THE OLD RECTORY, Brockhall - 1045891 | Historic England](#)

List Entry Number: 1075247

Name: Manor Farm, Cottage used as outbuilding

Grade: II

National Heritage List for England web page: [MANOR FARM, COTTAGE USED AS OUTBUILDING, Brockhall - 1075247 | Historic England](#)



List Entry Number: 107528

Name Rose Cottage and Western Cottage

Grade: II

National Heritage List for England web page: [ROSE COTTAGE WESTERN COTTAGE, Brockhall - 1075248 | Historic England](#)



List Entry Number: 1045909

Name: The Hall, Stable Block and Attached Wall and Gatehouse

Grade:II

National Heritage List for England web page: [THE HALL, STABLE BLOCK AND ATTACHED WALL AND GATEHOUSE, Brockhall - 1045909 | Historic England](#)



Source: Geograph website © Burgess Von Thunen



List Entry Number: 1075246

Name: Manor Farmhouse

Grade: II

National Heritage for England web page: [MANOR FARMHOUSE, Brockhall - 1075246 | Historic England](#)



List Entry Number:1075243

Name: Church of St. Peter and St. Paul

Grade: II\*

National Heritage List for England web page: [CHURCH OF ST PETER AND ST PAUL, Brockhall - 1075243 | Historic England](#)



List Entry Number: 1075245

Name: The Hall

Grade: II\*

National Heritage List for England web page: [THE HALL, Brockhall - 1075245 | Historic England](#)



Source: stringfixer.com

List Entry Number: 1001383

Name: Brockhall Park

Grade: II

National Heritage List for England web page: [BROCKHALL PARK, Brockhall - 1001383 | Historic England](#)







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# WEST NORTHAMPTONSHIRE COUNCIL PLANNING POLICY COMMITTEE

25<sup>th</sup> October 2022

**PORTFOLIO HOLDER FOR PLANNING, BUILT ENVIRONMENT AND RURAL  
AFFAIRS: COUNCILLOR REBECCA BREESE**

<b>Report Title</b>	Ise Valley Strategic Plan
<b>Report Author</b>	Jane Parry, Senior Planning Policy Officer jane.parry@westnorthants.gov.uk

<b>Contributors / Checkers / Approvers</b>		
<b>S151</b>	Martin Henry, Executive Director Finance	05/10/22
<b>Director</b>	Stuart Timmiss, Executive Director Place, Economy & Environment	06/10/22
<b>Legal</b>	Neil Weeks, Planning Solicitor, Legal Services	05/10/22
<b>Communications</b>	Becky Hutson, Head of Communications	27/09/22

## List of Appendices

### Appendix 1 – Ise Valley Strategic Plan study area

#### 1. Purpose of Report

---

- 1.1 To inform members about the River Ise Partnership, the content of the Ise Valley Strategic Plan and to seek agreement to West Northamptonshire Council being a named “partner”.

#### 2. Executive Summary

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- 2.1 The report summarises the background and content of the Ise Valley Strategic Plan, which has been prepared by the River Ise Partnership. It sets out the benefits of West Northamptonshire Council being a partner.

### **3. Recommendations**

---

- 3.1 It is recommended that Planning Policy Committee:
- a) Notes and endorses the contents of the Ise Valley Strategic Plan.
  - b) Agrees that West Northamptonshire Council will be a partner of the River Ise Partnership.

### **4. Reason for Recommendations**

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- 4.1 Endorsement of the Ise Valley Strategic Plan and agreement for West Northamptonshire Council to join the Partnership will enable the council to use the evidence to support habitat enhancement projects and emerging strategic policy.

### **5. Report Background**

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- 5.1 The River Ise is the largest tributary of the River Nene. The River Ise Partnership (RIP) was formed in 2019 through a collective interest in the River Ise catchment and is now a working group of the Nene Valley Catchment Partnership. The RIP comprises representation from the Nene Rivers Trust CIO (NRT, formerly River Nene Regional Park CIC), Bedfordshire Cambridgeshire and Northamptonshire Wildlife Trust, Environment Agency, Natural England, Forestry Commission, Anglian Water, North Northamptonshire Council and the Wicksteed Charitable Trust. West Northamptonshire Council is currently a friend of the partnership, officer representation at partnership meetings was invited in March 2021. The aim of the partnership is to work together to enhance the quality of the Ise Valley's natural environment, mitigate against climate change, seek opportunities for sustainable tourism and improve access to nature for people. The terms of reference are set out in an appendix to the Ise Valley Strategic Plan (IVSP).
- 5.2 The IVSP has been prepared by the NRT on behalf of the Partnership and was launched in October 2022.
- 5.3 The IVSP study area comprises the catchment of the River Ise and is shown in appendix 1. It is predominantly located in North Northamptonshire, extending from Geddington in the north, through Kettering to Wellingborough. Central to the valley are the towns of Kettering, Wellingborough and Corby, the planned growth of which will create a requirement for high quality accessible green space for recreational and ecosystem services, as well as enhancing existing green spaces for local communities. The source of the Ise is in West Northamptonshire close to Naseby, from where it flows eastwards past Clipston and Arthingworth to Geddington.

### **6. Issues and Choices**

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#### Ise Valley Strategic Plan

- 6.1 Despite its title, the IVSP is not a statutory planning document in the same sense as a local plan or neighbourhood plan and does not therefore form part of the West Northamptonshire



development plan for decision making. In this case, “strategic” refers to the landscape scale of the study area. The study area is divided into three zones, north, central and south. Only a relatively small area of West Northamptonshire is within the study area (part of the north zone).

- 6.2 The IVSP was publicly launched in October. The first section sets out the mission and seven aims which align with the mission. The IVSP mission can be summarised as follows: creating a connected landscape, with an emphasis on restoring and developing resilient, better managed habitats; caring for the Ise so that its water quality is high and flooding reduced; creating an environment for people and wildlife that will benefit tourism; and enhancing and protecting ecosystem services (these include food, climate regulation, recreation and habitat provision). It goes on to describe the study area, the policy context, relevant documents and existing evidence.
- 6.3 The second section describes the need for a strategic approach to the Ise catchment. Profiles of each of the three zones describe the existing situation and opportunities with regards to biodiversity; connectivity and access; community health and wellbeing; landscape; heritage; flooding and water management; and ecosystem services. The north zone is relevant to West Northamptonshire.
- 6.4 This section goes on to describe the issues for the Ise Valley:
- A. Population growth leading to increased pressure on the natural environment.
  - B. Necessity to enhance existing and create new open spaces and/or destinations to accommodate population growth.
  - C. Balancing of needs between people and wildlife in open spaces.
  - D. Limited access to the river for recreation.
  - E. Physical modifications to the watercourse.
  - F. Resilience to climate change and contribution to mitigation.
  - G. Pollution.
  - H. Flood risk.
  - I. Threat of non-native species to native flora and fauna.
  - J. Management and maintenance of designated habitats to ensure restoration, conservation and enhancements.
- 6.5 The third section sets out proposals to implement the strategy based on three strands which are to develop working practices; general project principles; and delivering specific projects to realise the partnership mission and aims. These are set out in tables with activities, descriptions, leading partners and potential sources of funding for the projects. The list of projects include ones that could take place in multiple locations such as undertaking surveys and creating a cycling and pedestrian route at various locations along the river. It also includes place specific proposals, none of which are in West Northamptonshire.
- 6.6 The ISVP will be reviewed annually to measure progress and keep it up to date. It will undergo a comprehensive review every four years.

#### Benefits of West Northamptonshire being a partner

- 6.7 Despite only a small part of West Northamptonshire being in the study area there would be benefits to the council being a partner. The IVSP reinforces the understanding that the Ise is a connected network of blue and green infrastructure and it will be a useful resource to ensure

that proposals and works along the stretch of the river in West Northamptonshire take account of and align with the mission and aims. It would also facilitate identifying and implementing projects that cross local authority boundaries, including sources of funding.

- 6.8 The evidence for the plan includes habitat opportunity mapping which dovetails with natural capital and green infrastructure evidence produced to support the emerging West Northamptonshire Strategic Plan. This will inform policies and proposals including natural capital, green infrastructure, biodiversity net gain, climate change mitigation and place shaping. Where planning proposals arise in the north zone it can be used to support decision making and secure developer contributions where appropriate.
- 6.9 Lastly, it would be beneficial to be part of a network of partner agencies with specialist knowledge of ecology and water habitats.

## **7. Implications (including financial implications)**

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### **7.1 Resources and Financial**

- 7.1.1 Any funding required for projects etc. would be the subject of a separate report.

### **7.2 Legal**

- 7.2.1 There are no direct legal implications arising from the endorsement of the IVSP. The partnership was created prior to the formation of WNC. If WNC becomes a partner it will be bound by the terms of reference.

### **7.3 Risk**

- 7.3.1 There are no significant risks arising from the proposed recommendations in this report.

### **7.4 Consultation**

- 7.4.1 The IVSP does not form part of the West Northamptonshire development plan, there is therefore no requirement for statutory consultation. During its preparation it has been subject to internal consultation within the partnership.

### **7.5 Consideration by Overview and Scrutiny**

- 7.5.1 Not applicable.

### **7.6 Climate Impact**

- 7.6.1 The IVSP mission and aims promote an enhanced and restored natural environment. One of the issues is to build resilience to climate change and contribute to mitigation.

### **7.7 Community Impact**

- 7.7.1 The ISVP aims to create a connected and more accessible network of spaces for people and wildlife. It seeks to increase the level and diversity of partner and community participation in

the planning and delivery of projects and use of the valley. People will benefit in terms of health, fitness and wellbeing.

## **8. Background Papers**




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### 8.1 Ise Valley Strategic Plan (including terms of reference)


# Appendix 1: Ise Valley Strategic Plan study area

## Legend



### Study Area

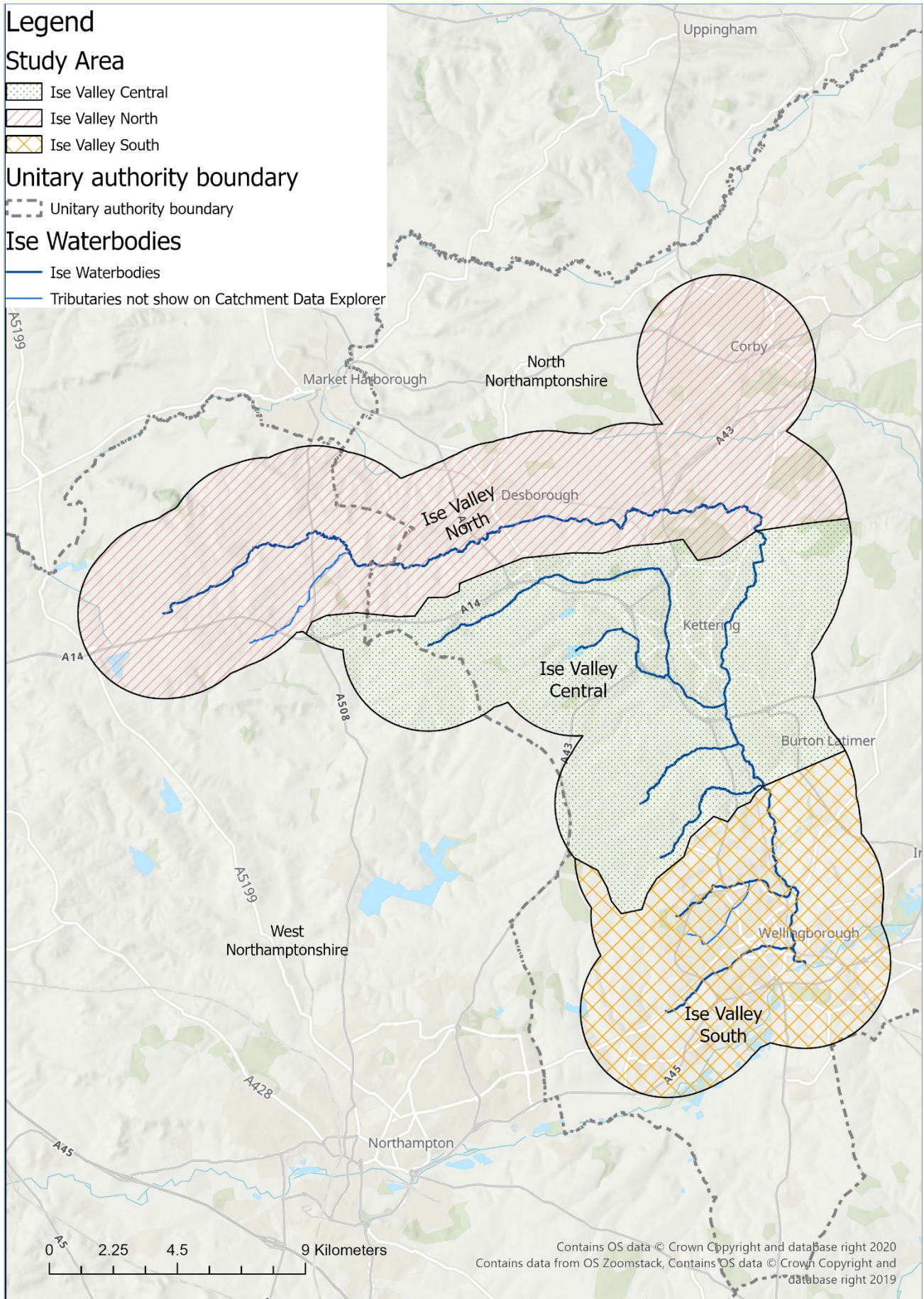
-  Ise Valley Central
-  Ise Valley North
-  Ise Valley South

### Unitary authority boundary

-  Unitary authority boundary

### Ise Waterbodies

-  Ise Waterbodies
-  Tributaries not show on Catchment Data Explorer





# WEST NORTHAMPTONSHIRE COUNCIL PLANNING POLICY COMMITTEE

25<sup>th</sup> October 2022

Cllr Rebecca Breese, Portfolio Holder for Planning, Built Environment and Rural Affairs

<b>Report Title</b>	<b>South Northamptonshire Local Plan Part 2 – Employment Allocations Supplementary Planning Document</b>
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<b>Report Author</b>	<b>Alan Munn, Planning Policy and Conservation Manager</b>
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## Contributors/Checkers/Approvers

<b>West 151</b>	Martin Henry	Approval obtained 11.10.2022
<b>Director</b>	Stuart Timmiss	Approval obtained 14.10.2022
<b>Communications Lead/Head of Communications</b>	Becky Hutson	Approval obtained 12.10.2022
<b>Legal</b>	Neil Weeks	Email sent 11.10.2022

## List of Appendices

Appendix A – South Northamptonshire Local Plan Part 2 – Employment Allocations Supplementary Planning Document consultation (07 July – 18 August 2022): Summary of responses received and Council response and action.

Appendix B – Draft South Northamptonshire Local Plan Part 2 – Employment Allocations Supplementary Planning Document (October 2022).



## **1. Purpose of Report**

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For members to consider the responses to the consultation on the draft Employment Allocations Supplementary Planning Document (Appendix A) and, subject to the amendments set out being agreed, endorse the adoption of the SPD as drafted at Appendix B.

## **2. Executive Summary**

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- 2.1 The South Northamptonshire Local Plan (Part 2) 2011-2029 was adopted in July 2020 and adds local context to the policies of the West Northamptonshire Joint Core Strategy Local Plan (Part 1) (WNJCS) which was adopted in December 2014 setting out the strategic policy position for the south Northamptonshire area.
- 2.2 Delivering appropriate new employment opportunities in both urban and rural areas is a key objective of the Part 2 Plan as is facilitating economic growth and encouraging investment and job creation. The Plan makes a number of employment allocations to support these objectives, these are detailed under Policies AL1 to AL5 of the Plan <https://www.southnorthants.gov.uk/downloads/download/698/local-plan-part-2-adoption-documents>
- 2.3 A Supplementary Planning Document (SPD) has now been prepared to ensure a positive approach to the development of the employment allocations, providing clarity and certainty to the public and developers whilst ensuring the wider sustainability objectives of the plan are also delivered.
- 2.4 This report summarises the process which has been followed to produce the SPD and presents the responses to the public consultation on the document along with suggested amendments to it.

## **3. Recommendations**

---

- 3.1 It is recommended that the Planning Policy Committee:
  - a) Note the response to the public consultation on the Employment Allocations SPD,
  - b) Accepts the recommended modifications (Appendix A) in respect of the Employment Allocations SPD,
  - c) Approves the adoption of the document (Appendix B), as modified in accordance with recommendation (b) above, as a Supplementary Planning Document (SPD),
  - d) Agrees that delegated authority be given to the Interim Head of Planning and Climate Change Policy to make further minor editorial changes to the SPD to address any factual and typographical errors and to reflect the fact that the document will be in its intended final form.

## **4. Reason for Recommendations**

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- 4.1 The South Northamptonshire Local Plan Part 2 – Employment Allocations Supplementary Planning Document has been prepared to ensure a positive approach to the development of the employment allocations, providing clarity and certainty to the public and developers whilst ensuring the wider sustainability objectives of the local plan are also delivered. Its adoption will allow it to be a material consideration in the determination of planning applications.

## **5. Report Background**

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- 5.1 Supplementary Planning Documents (SPDs) build upon and provide more detailed advice or guidance on policies in an adopted local plan. They do not however form part of the development plan, nor can they introduce new planning policies. They are however a material consideration in decision-making and an important tool in helping deliver the policies of the development plan.
- 5.2 The South Northamptonshire Local Plan (Part 2) 2011-2029 was adopted in July 2020 and makes a number of employment allocations to support these objectives, these are detailed under Policies AL1 to AL5 of the Plan.
- 5.3 In February 2022 work commenced on the production of a draft SPD to deliver the employment allocations of the South Northamptonshire Local Plan Part 2.
- 5.4 Should it be adopted the SPD will be a material consideration in decision making and provide more detailed advice and guidance in line with the adopted policies in the development plan.
- 5.5 At its meeting of 27 January 2022 the Council’s Strategic Planning Committee considered an application for the development of Local Plan Allocation AL3 (Tiffield Lane, Towcester). The committee resolved to approve that application and grant planning permission for the development. With matters already agreed in respect of AL3 and the Notice of Decision issued on 23 June 2022 the SPD does not consider or make recommendations in respect of that Local Plan Allocation.
- 5.6 The SPD provides an analysis of the existing planning policy and socio-economic context against which the employment allocations should be considered before providing an assessment of allocated sites (AL1, AL2, AL4 and AL5) and the wider area in which they are located. It concludes by setting out a number of overarching design principles and providing a development framework for each of the four allocated sites. It is against these principles and frameworks that the future proposals for the sites should be considered.
- 5.7 In order to adopt a document as an SPD and for the document to have weight, the document must pass through a period of not less than four weeks formal consultation, in line with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 5.8 At its meeting on 28 June 2022 West Northamptonshire Council’s Planning Policy Committee approved a draft of the Employment Allocations SPD for a six week public consultation. That consultation ran from 07 July 2022 to 18 August 2022.

- 5.9 The consultation was undertaken in accordance with the Council's adopted Statement of Community Involvement (South Northamptonshire Area – adopted July 2020) as detailed in the SPDs Consultation and Engagement Strategy considered by the June committee. This included press releases, a number of social media alerts and three public exhibitions which were held at Towcester and Old Stratford on the 13th, 14th and 20th July. A Frequently Asked Questions document was also produced and made available on the council's consultation website along with all other documents which were also held on deposit at local libraries.
- 5.10 All comments that were made during the consultation can be found at Appendix A to this report. In total 306 responses were received to the consultation. These were made by a variety of stakeholders including, residents, landowners, parish and town Councils, district councillors, the Member of Parliament for South Northamptonshire, local interest groups, neighbouring authorities, statutory consultees and the developers of the five Local Plan employment allocations.
- 5.11 Between them they made a variety of often differing observations and comments. A number of these were of a detailed nature relevant to the determination of planning applications and not the draft SPD. Others related to non planning matters beyond the scope of the SPD.

#### 5.12 **Consultation responses**

All consultation responses and the Council's response to them can be found at Appendix A. There have been a number of comments made on multiple occasions and those, along with some 'in principle' objections to the SPD, are discussed in the following paragraphs

##### 5.12.1 **The need for development/divergence from the local plan**

A number of responses objected to and consider that warehouse development is not justified under the Local Plan and suggest that the SPD should be amended to guide that given the level of local employment skills there is no demonstrated demand for warehousing.

In response to this the South Northamptonshire Local Plan Part 2 is clear that by allocating additional employment land and by facilitating more local employment growth it aims to attract new investment and provide more jobs to match the skills of local people, thereby balancing the ratio of in and out commuting. It is also recognised that the South Northamptonshire area is delivering high levels of housing growth and that there is a need to seek to ensure that this is complemented by additional provision of employment land and jobs. The Local Plan makes five employment allocations which are intended to:

- Meet local demand and strengthen the rural economy;
- Provide the ability to strengthen local supply chains;
- Provide local flexibility and choice of locations;
- Meet the demand for small and medium sized units; and
- Contribute to reducing the level of out commuting.

Employment Allocation policies detailing that the sites are suitable for an independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use. The SPD does not form part of the development plan and cannot introduce new planning policies, nor can it delete/amend existing planning policies.

### **5.12.2 The justification for the SPD**

Responses also questioned the justification for and timing of the SPD with comments made that the approach seems more about creating policy to justify the potential future concerns about the current applications rather than a genuine attempt to create positive planning policy for the area and are a reaction to the concerns raised during the determination of the application for AL3.

Others suggest that the policies of the Development Plan are sufficient and provide a clear guide to what is expected of future development and as a consequence there is no need for the SPD and that through the granting of planning permission at Allocation AL3 it is clear that the Officers, together with Members of the planning committee, were capable of assessing that planning application without the need for the SPD.

In response to this it should be noted that the SPD cannot and does not create new policy but instead provides more detailed advice and guidance on policies in an adopted local plan. The SPD has been produced to assist the Council and other parties on the decision making on future planning applications.

### **5.12.3 The non-inclusion of allocation AL3 at Tiffield Lane Towcester.**

A number of responses question the non-inclusion of local plan allocation AL3 in the SPD.

They recognise that the publication of the draft SPD for consultation followed the granting of planning permission for AL3 but considered that the approved scheme sets a context for the development of those sites in the vicinity of AL3 and the parameters and approach to what the council have already approved should be set out in the SPD and that that future reserved matters applications for AL3 should be pursuant to the hybrid application and guided by the parameters set in that permission but also the SPD. This it is felt should be the same way for all the other employment sites. It is also possible that the current planning permission is not implemented either entirely, or in part.

They further consider that the omission of AL3 is a fundamental flaw, which means the SPD does not have an effective evidence base for its assessment. It is seen that the omission of AL3 (and other cumulative developments) at Towcester negate the argument for medium and small-scale development based on the present context, when they should address the known and emerging future change to come to ensure a coordinated and unified design response.

In response to this it is considered that the non-inclusion of AL3 within the SPD does not represent a fundamental flaw. Any future applications submitted in relation to app Page 109

AL3 will need to be considered in respect of and comply with the parameters set out in that approved consent (WNC reference S/2020/1644/EIA) and the details will be subject to a further impact assessment carried out in line with the general principals set out in this SPD.

#### 5.12.4 The introduction of 'new policy'

A number of responses consider that as drafted the SPD introduces new policy. This an observation in relation to unit sizes and building heights and the design guidance suggestions in relation to exemplar development.

In respect of building heights and sizes it is argued that it should be recognised that nowhere in any of the policies in the Development Plan is there any reference to small and medium units. It is therefore suggested that limited weight can only be attributable to sections of the SPD that are drafted based on objectives or supporting text of the adopted development plan.

They continue that there is nothing in Local Plan policy which states that larger buildings should only be allowed in "exception circumstances" – this is considered to create a new policy hurdle and test which is not justified.

Other responses suggest that is inappropriate for the SPD to make a presumption on the range of unit sizes to be provided on the allocations which is not supported by an independently assessed market report.

Conversely other responses suggest that the use of the word 'Large' and the categorisation of buildings under that classification is adding new policy in itself as the policies and supporting text of the Local Plan Part 2 do not discuss large buildings making reference only to small and medium units. They follow that by stating that large buildings may be acceptable in exceptional circumstances the SPD is introducing new policy that could allow for the development of larger sized building which it is argued the policies of the Local Plan do not support.

Comments were also made in relation to the SPDs guidance on exemplar development with respondents highlighting that there is no requirement in the Part 2 Plan for developments within the Local Plan to be "exemplar" in their approach. They consider that by using the term exemplar within the SPD, it creates an unrealistic and new policy test for these developments which is unreasonable. The developments should be high quality in design terms with sustainable inclusiveness in line with Development Plan policy. The SPD should not refer to or expect exemplar development and all references to exemplar should be replaced with "high quality"

In response to this, as detailed above, the SPD cannot and does not create new policy but instead provide more detailed advice and guidance on policies in an adopted local plan. In respect of SPD making a presumption on the range of unit sizes to be provided on the allocations which is not supported by an independently assessed market report, the SPD reiterates that the development of the allocations are to be accompanied by independent studies in respect of uses and also sets out a development framework for each site that will inform future planning decisions.

With regard to exceptional circumstances and being exemplar developments the SPD is not introducing new policy but trying to encourage the raising of standards. However, paragraph 110



of the SPD has been amended to avoid any confusion. The use of 'exceptional circumstances' illustrates the interpretation of the policy but is not a new or additional policy.

### 5.12.5 Small, Medium and Large Buildings & Building heights

A number of comments were submitted in respect to the guidance on height put forward through the site development frameworks and the scale used in determining 'Small, Medium and Large' buildings. Also from what point on the land the height of buildings was to be measured from.

Some responses considered that the evidence base used to determine the building sizes is not appropriate or robust and requires further assessment stating that it must be revisited with additional regional and national evidence, to ensure the SPD is sound.

Others felt that the categorisation does not address the 'reality' on the ground via differing sites being able to accommodate development and it ignores the approved AL3 scheme, which they consider will fundamentally change to the character to the north of the A43. It is also suggested that there is no clear relationship between the footprint of a proposed building and its height in the examples provided, and it is unclear if the supporting studies for the SPD have investigated heights.

Conversely other responses consider the use of a sites on the M1 as a comparator for rural locations such as those in the South Northants Local Plan is inappropriate. They detail that the local plan states in the policy that proposals need to be in keeping with the surroundings and identify that, with the exception of AL3, all the other sites have industrial, retail or other units either on site or very near which it is felt to act as a very good marker as to the size and scale envisaged by the council as the time of adoption of the local plan.

Other responses identify that paragraph 13.2.2 of the Part 2 Local Plan states in respect of the allocations that Towcester that 'All three sites offer suitable locations for a range of new small and medium sized business units' and that Paragraph 13.2.3 (AL1/Bell Plantation) states that allocation represents an appropriate employment location for the provision of additional small and medium sized commercial buildings' and paragraph 13.3.2 (AL4/Shacks Barn) states 'This allocation proposed to extend the business park with a range of new small and medium sized business units.'

They consider that as currently written the SPD introduces new policies, with the possibility of providing large scale building. This it is consider is not the intent of the Local Plan Policies and therefore should not be included in the SPD.

Further responses suggest alternate sizes in respect of the thresholds proposed with a number of responses suggesting that 5,000 sqm should be the threshold for 'large' units and that anything over that size should not be permitted by the SPD. A further response suggests that the SPD should have a fourth category of 'very large' which would be more than 15,000sqm with units of that size not being allocated to the SPD sites.

In response to this the SPD is clear that building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping.

The heights are indicative and further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.

With regard to small, medium and large buildings this again has been informed by a thorough assessment of the surrounding area and the approach provides clarity and direction in respect of the future development of the sites.

#### **5.12.6 Highways issues**

A number of responses raised concerns in relation to the highways impacts of the allocations along with the approach to transport assessment and to the consideration of cumulative impacts.

In response to this the scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.

National Highways have undertaken their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.

#### **5.13 Summary of Main Changes**

A number of matters of detail and clarity were raised through the consultation, and in response to these, in some cases, amendments to the SPD are proposed. Whilst all changes are reported in Appendix A to this report and included in the SPD at Appendix B the following changes are worthy of note.

- 5.13.1 For clarity the SPD has been amended in a number of places to confirm that the heights identified in the Development Framework sections are indicative and should be measured from existing levels.
- 5.13.2 Revision has been made to para 6.10 in respect of Allocation AL1 to acknowledge the sensitivities of the whole site, not just the north and north-easter edges.
- 5.13.3 A 'Viewing Corridor' has been added to the Development Framework for AL2 to highlight the importance of the visual and historical relationship between the Greens Norton Church spire and Easton Neston House.
- 5.13.4 Amendments have been made to the Development Frameworks sections on drainage in response to the consultation response of the Environment Agency.
- 5.13.5 A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.

- 5.13.6 The wording 'in part' has been removed in respect to the presentation of the requirements of paragraph 13.1.5 of the South Northamptonshire Local Plan Part 2.
  - 5.13.7 Amendment to the red line site boundary for AL5 as it was noted that there was a plotting error in the draft SPD.
  - 5.13.8 Additional wording has been added in response to the comments of Northamptonshire Police's Crime Prevention Design Advisor to reinforce the need to design out crime.
  - 5.13.9 Amendments have been made to Paragraph 7.1 to avoid confusion in respect of exemplar developments.
  - 5.13.10 A glossary has been added.
- 5.14 For clarity within the document areas where the SPD has been amended are shown in red text in the draft at Appendix B. These amendments are discussed in the table at Appendix A with the original consultation draft SPD available to view at [https://westnorthants.citizenspace.com/place/sn-employment-allocations-spd\\_consultation/](https://westnorthants.citizenspace.com/place/sn-employment-allocations-spd_consultation/)

## **6. Issues and Choices**

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- 6.1 The Council could choose not adopt the SPD. However, this could lead to uncertainty over the future development of the allocations and the design principles it is expected future development should align to.

## **7. Implications (including financial implications)**

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### **7.1 Resources and Financial**

- 7.1.1 The SPD has been prepared using the existing budget of the Planning Policy Team.

### **7.2 Legal**

- 7.2.1 The process for preparing SPDs is set out in Part 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

### **7.3 Risk**

- 7.3.1 No risks arise from the content of this report.

### **7.4 Consultation**

- 7.4.1 As detailed in paragraph 5.8 - 5.10 public consultation ran from 07 July 2022 to 18 August 2022 and was undertaken in line with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's own Statement of Community Involvement (South Northamptonshire Area – adopted July 2020).

### **7.5 Consideration by Overview and Scrutiny**

7.5.1 Not applicable.

## 7.6 **Climate Impact**

7.6.1 There are no direct consequences of this report although the policies of the Development Plan and the guidance in the SPD promote the principles of sustainable development.

## 7.7 **Community Impact**

The SPD will provide clarity and certainty to the public in respect of the development and delivery of the local plan allocations.

## 7.8 **Communications**

7.8.1 Support was provided by the Communications Team to maximise engagement with the formal consultation process. A Consultation and Engagement Strategy was produced in respect of the draft SPD. The council will continue to keep the public and all other stakeholders informed of the progress of the SPD.

## **8. Background Papers**

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8.1 Planning Policy Committee – June 2022 Item 11

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD001	R Parry	<p>It makes no never mind what I think or anyone else for that matter.</p> <p>You build and keep allowing building here in Brackley. And you have ruined this town because of it.</p> <p>Building right next door to the lake is the last straw so why do you bother having ANY consultations it is a joke.</p> <p>Gone is the peace for people and more so the wildlife that lives there.</p> <p>Once it's gone it's Gone so congrats for that to.</p>	Comments Noted.	No change
SPD002	C Robertson	<p>Please find below concerns regarding the Warehouse Development at Shacks Barn and Around Towcester as follows:</p> <p>1. <b>TRAFFIC</b> – A cumulative Traffic study and assessment must be carried out to cover ALL the sites I know how congested the Tove/Abthorpe roundabouts become, as well as the centre of Towcester, and that our villages are used as rat-runs. National Highways and West Northants Highways have repeatedly ducked this key issue. I am concerned about HGVs using the A413 through Silverstone and increased rat running through Whittlebury. We need <b>ACCURATE/CONSISTENT TRAFFIC ANALYSIS</b>.</p> <p>2. <b>FOOTPRINTS</b>– The original Local Plan was intended for small and medium sized units only. Keep it to that with no building exceeding 5,000m<sup>2</sup>, which is precedent for this area. For comparison the largest units at Silverstone Circuit are 5,000m<sup>2</sup>. The SPD suggests that units over 8,000m<sup>2</sup> could be built on all sites 'in exceptional circumstances. We need to have this option removed. The <b>MAXIMUM FOOTPRINT is FOR MEDIUM UNITS of 5,000m<sup>2</sup> AND NO LARGE UNITS should be put in.</b></p> <p>3. <b>HEIGHTS</b> – the SPD allows for buildings on AL4 up to 15m high which is much too high for a site with wide visual impact; AL1 “rising to 16m” – which is too high (especially if they are</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>built on raised platforms adding up to 7m); AL2 up to 12m in height. All these are much taller than any other existing building in the area. <b>KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M.</b></p> <p>The existing employment space in Towcester has gradually developed over the last 30 years.</p> <p>Large scale, high bay logistics hubs of the sort proposed by DHL will be built and operational within 3 years. Therefore 30 years' worth of development in less than 3 years.</p> <p>These are serious concerns</p>	<p>improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029)..	
SPD003	K Movsessian	<p>To whom it may concern, I am writing to you to voice huge concerns with regards to the Podium development. I have lived in the village my entire life of 27 years so far and am horrified at the thought of our village - which is already used as a through road these days due to poor conditions on surrounding roads - having lorries thundering up and down at all times of the day. Please see the below points which further highlight mine and the communities concerns.</p> <p>1. <b>TRAFFIC</b> – A cumulative Traffic study and assessment must be carried out to cover ALL the sites. We know how congested the Tove/Abthorpe roundabouts become, as well as the centre of Towcester, and that our villages are used as rat-runs. National Highways and West Northants Highways have repeatedly ducked this key issue. We are concerned about HGVs using the A413 through Silverstone and increased rat running through Whittlebury. We need <b>ACCURATE/CONSISTENT TRAFFIC ANALYSIS.</b></p> <p>1. <b>FOOTPRINTS</b>– The original Local Plan was intended for small and medium sized units only. For comparison the largest units at Silverstone Circuit are 5,000m<sup>2</sup>. The SPD suggests that units over 8,000m<sup>2</sup> could be built on all sites 'in exceptional circumstances. We need to have this option removed. <b>MAXIMUM FOOTPRINT FOR MEDIUM UNITS SHOULD BE 5,000m<sup>2</sup> AND NO LARGE UNITS.</b></p> <p>2. <b>HEIGHTS</b> – the SPD allows for buildings on AL4 up to 15m high which is much too high for a site with wide visual impact; AL1 “rising to 16m” – which is too high (especially if they are built on raised platforms adding up to 7m); AL2 up to 12m in</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>height. All these are much taller than any other existing building in the area – NB Screwfix is 9.5m high. <b>KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M.</b></p> <p>I look forward to your response to the points I have raised.</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD004	A Minish	<p>I am writing as I am extremely concerned about the proposed new DHL development near the Bell Plantation on the A5. I hope that the planning is rejected.</p> <p>I do not want it to go ahead as it is too large, way too high, and will be a complete eyesore. It will greatly impact on the countryside and the beautiful area that we live in.</p> <p>I live in <b>(address removed)</b>, and traffic around Towcester at the moment is terrible. If the A5 or any other roads are closed, then traffic already goes through Greens Norton and becomes a rat run, and often congested on the high street. It will be even more of a problem if this warehouse is built. I am also worried about the extra traffic on the environment. I don't believe there has been any accurate traffic analysis.</p> <p>I believe that the value of the local properties will also be affected.</p> <p>I really do hope that it is rejected.</p>	<p>The planning application for the proposed DHL development is being considered through the Development Management process (reference WNS/2021/1819/EIA). Once adopted, this SPD will be a material planning consideration against which the planning application will be determined.</p> <p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include</p>	No change.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Property values are not a material planning consideration and cannot be considered.	
SPD005	A Lohman	<p>In respect of the above consultation, having read the SPD issued last week I wish to register my agreement with the proposal by the 'Save Towcester Now' campaign that the SPD must, as a minimum, include the following three points:</p> <p><i>1. A cumulative <b>TRAFFIC</b> study and assessment must be carried out to cover ALL the sites – AL1-4. We know how congested the Tove/Abthorpe roundabouts become, as well as the centre of Towcester, and that our villages are used as rat-runs. National Highways and West Northants Highways have repeatedly ducked this key issue. We do not have the road infrastructure to cope with developments of this type. We need <b>ACCURATE/CONSISTENT TRAFFIC ANALYSIS</b>.</i></p> <p><i>2. <b>FOOTPRINTS– MAXIMUM FOOTPRINT FOR MEDIUM UNITS 5,000m2 AND NO LARGE UNITS.</b></i></p> <p><i>The original Local Plan was intended for small and medium sized units. Keep it to that with no building exceeding 5,000m2, which is the precedent for this area. For comparison the largest units at Silverstone Circuit are 5,000m2. The SPD suggests that units over 8,000 m2 could be built on all the sites “in exceptional circumstances”. We need to have this option and ambiguity removed.</i></p> <p><i>3. <b>HEIGHTS – KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M.</b></i></p> <p><i>The SPD allows for buildings on AL1 “rising to 16m” – which is too high (it is not clear whether this still allows platforms adding</i></p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p><i>up to 7m); AL2's buildings up to 12m in height and on AL4's up to 15m high. All these are much taller than any other existing building in the area – NB Screwfix is 9.5m high. They'll be seen for miles and will have a negative visual impact on our area.</i></p> <p>Additionally I would stress that there must be no exceptions to any of the above points for 'exceptional' or other reasons. Period.</p> <p>Subject to inclusion, without qualification or alteration, of the above I support the SPD.</p> <p>We live in an area of virtually full employment (South Northants - as per latest ONS statistics) and such employment sites that have been identified should be used for their intended purpose: to facilitate additional small scale employment opportunities in the local i.e. Towcester/South Northamptonshire area.</p> <p>Out of interest I am also intrigued as to how new/additional warehousing in and around Towcester would ever be permitted, let alone considered, given the statement in the JCS (2.15 of the SPD refers) that 'delivering new space to cater for the warehousing sector.....would not be desirable in order to achieve a balanced (across West Northamptonshire) economy'.</p>	<p>of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			Paragraph 2.15 of the draft SPD sets out the jobs growth narrative as identified by the Local Plan Part 1.	
SPD006	L Saunders	<p>I have just returned from viewing the proposed planning applications for Towcester and the surrounding areas. There was so much I did not understand. I do not object to new building in Towcester if the buildings are appropriate for the area. The size and scale of the DHL proposal is far too big for the location. Towcester is a small, very old market town. It used to be a thriving town The residential building has increased so much that Towcester is no longer thriving as it is a permanent traffic jam.</p> <p>I was so disappointed and shocked that on the plans they are still suggesting that some of the warehouses which are proposed on land that should only have small to medium warehouses still state that the buildings could be up to 16metres high. That large not small to medium.</p> <p>Bell Plantation have developed the area with appropriate size buildings and the land next to it should be the same.</p> <p>In my opinion the council should not be passing any of these developments until there is a solution to the traffic problems encountered on a daily basis. If the developers want these warehouses so badly make them fund a proper bypass to the town that the lorries can use.</p> <p>I sincerely hope the councillors who have the future of this lovely town in their hands think about the long term damage allowing such huge developments will do. Without the proper infrastructure historic buildings will be damaged, pollution in town will be at dangerous levels, and traffic will be gridlocked.</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			<p>local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. The size and scale of units at Bell Plantation has been considered in the preparation of this SPD. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	
SPD007	D Bean	<p>I like playing in puddles but not in a flood and what you (she means the planning office) are doing is destroying the green (in Hulcote) because if you put the house (she means the proposed warehouse near Hulcote) there and we flood, you (not you personally) will destroy Hulcote.</p>	<p>The development frameworks set outs an integrated and attractive sustainable drainage network. The drainagenetwork should explore any opportunity to add ecological and amenity value to the developments, such as through the introduction of rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes. Ultimately the location</p>	<p>No changes necessary.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.	
SPD008	C Davis	<p>1. A cumulative TRAFFIC study and assessment must be carried out to cover ALL the sites – AL1-4. We know how congested the Tove/Abthorpe roundabouts become, as well as the centre of Towcester, and that our villages are used as rat-runs. National Highways and West Northants Highways have repeatedly ducked this key issue. We do not have the road infrastructure to cope with developments of this type. We need ACCURATE/CONSISTENT TRAFFIC ANALYSIS.</p> <p>2. FOOTPRINTS– MAXIMUM FOOTPRINT FOR MEDIUM UNITS 5,000m2AND NO LARGE UNITS. The original Local Plan was intended for small and medium sized units. Keep it to that with no building exceeding 5,000m2, which is the precedent for this area. For comparison the largest units at Silverstone Circuit are 5,000m2. The SPD suggests that units over 8,000 m2 could be built on all the sites “in exceptional circumstances”. We need to have this option and ambiguity removed.</p> <p>3. HEIGHTS – KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M. The SPD allows for buildings on AL1 “rising to 16m” – which is too high (it is not clear whether this still allows platforms adding up to 7m); AL2’s buildings up to 12m in height and on AL4’s up to 15m high. All these are much taller than any other existing building in the area – NB Screwfix is 9.5m high. They’ll be seen for miles and will have a negative visual impact on our area. Finally: The existing employment space in Towcester has gradually developed over the last 30 years. Large scale, high bay logistics hubs of the sort proposed by DHL will be built and</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>operational within 3 years. Therefore 30 years' worth of development in less than 3 years. It makes no sense. Please, go to the meeting on Wednesday and email WNC before 18th August to help protect us now - and the generations to come. Thank you.</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p>	



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD009	K Attenborough	<p>I would like to give comment and raise the concerns I have on the proposed DHL warehouse and other developments that are currently being proposed around Towcester. I live locally and I very much agree with the comments made by the Save Towcester Now group's charter of:</p> <p>1. <b>TRAFFIC ISSUES</b>– A cumulative Traffic study and assessment must be carried out to cover ALL the sites – AL1-4. Congestion at the Tove/Abthorpe roundabouts is already bad, as well as in the centre of Towcester, villages are used as rat-runs and the crossroads on the A5 at Banbury Lane/Pattishall is already a nightmare with an increase in accidents recently. More traffic on the A5 will only add to this issue. The huge number of people needed to staff these warehouses (I hear that they are also happening for a benefit of local employment) will have to travel in. There is not enough people needing work in this small area to staff them all. This will also increase traffic congestion and pollution. National Highways and West Northants Highways have not addressed this key issue. There is not the road infrastructure to cope with developments of this type. There needs to be <b>ACCURATE/CONSISTENT TRAFFIC ANALYSIS</b>.</p> <p>2. <b>FOOTPRINTS</b>– The original Local Plan was intended for small and medium sized units. Keep it to that with no building exceeding 5,000m<sup>2</sup>, which is the precedent for this area. For comparison the largest units at Silverstone Circuit are 5,000m<sup>2</sup>. <b>MAXIMUM FOOTPRINT FOR MEDIUM UNITS 5,000m<sup>2</sup> AND NO LARGE UNITS</b>. Units of larger than this will have significant visual impact on this rural area.</p> <p>3. <b>HEIGHTS</b> – the Supplemental Planning Document allows for buildings on AL1 “rising to 16m” – which is too high (especially if they are built on platforms adding up to 7m); AL2's buildings up to 12m in height and on AL4's up to 15m high. All these are much taller than any other existing building in the area – NB</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>Screwfix is 9.5m high. They'll be seen for miles and will have a negative visual impact on our area. <b>KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M.</b></p> <p>Thank you for registering the above concerns to these new developments.</p>	<p>considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p>	
SPD010	P & J Parris	<p>My wife and I have now had an opportunity to view the Supplementary Planning Document (SPD) relating to WNC proposed development zones AL1 to AL4 Inc.</p> <p>We have two fundamental concerns, namely the massive increase in traffic that will converge on to the Tove roundabout from the A5 and A43 potentially causing major congestion and</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. This has included understanding the historical context and heritage assets in the area.</p>	<p>The SPD will be amended to confirm that the heights are</p>

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		<p>thereby creating significant delays and difficulty in accessing Towcester from the North, East and West.</p> <p>We are also concerned over the visual impact especially by the proposed heights of the buildings on the DHL site (AL1) - 16m tall buildings placed on a proposed 7m increase in height of the ground level immediately adjacent to the A5, will take the overall height of such buildings opposite Bairstow Lodge to over 23 metres (75ft) and will clearly not be camouflaged or hidden effectively by currently proposed landscaping. At the very least we believe that the ground level of the DHL site should remain approximately level with that of the adjacent carriageway (A5) and that all such buildings on sites AL1 and AL2 should be restricted to approximately 10m in height, in an attempt to mitigate the visual impact on the immediate surrounds and the main access route to the ancient Roman town of (Lactodorum) Towcester . All displaced earth from the DHL development could and should be used to surround the site to provide suitably high earth bunds (with tree planting on top) to give as much visual protection from the distribution units which form their current proposals for site AL1. Clearly, DHL's current proposals simply create far too many traffic movements accessed from the single carriageway A5 and should be reduced significantly.</p> <p>We should be most grateful if you would give serious consideration to our concerns and restrict all proposed planning developments along the lines as outlined above. Clearly current proposals deviate from the 'small to medium business development' use that was originally in place on these zones and we firmly believe this restriction should be applied!</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the</p>	<p>indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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			heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.	
SPD01 1	E Carter	<p>I attended yesterday's Drop-in meeting at The Forum in Towcester on behalf of Cold Higham Parish Council. Although our Council have not formally been consulted, we have commented in the past on the proposals, in particular AL1.</p> <p>Along with other villages north of Towcester, along the A5, most of our residents depend on Towcester for every-day facilities such as shopping and eating out. It is hard enough at the moment to drive into the town at times due to the volume of traffic at the A5/A43 roundabout, and any increase in this will seriously harm residents' quality of life. Many are already talking about driving to Daventry or Northampton for daily essentials, a significantly greater distance.</p> <p>The exit/entrance for AL1 is planned to be straight onto the A5 and, as I understand it, there will be a further roundabout on the A5 to facilitate this access. This will significantly increase traffic delays just at the busiest point along the road, both north and south bound. Indeed it is hard to see how the north bound hold-ups at this new roundabout will not seriously impact on the current roundabout with the A43, making traffic flow in ALL directions a nightmare. Traffic coming from the direction of Greens Norton to the A43 roundabout, which is a commonly used alternative to the A5, already finds it extremely difficult to enter the roundabout. There does not appear to be any comprehensive, post-Covid, traffic analysis of this whole area, which is surely vital information for planners and public alike. I have not examined the plans for the other sites (AL2 is obviously going to add significantly to the problems AL1 will</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. In preparing the evidence base, consideration was given to the villages to the north of Towcester.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact</p>	No change.

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		introduce), but the cumulative effect of all this traffic increase is going to be a nightmare for our residents. I fail to understand why the warehouse site has to be located so far away from the motorway network, which the traffic will surely be wanting to access.	of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.	
SPD01 2	G Hillman	<p>Following my visit to The Forum for Drop In Session to view the proposed Local Plan I make the following comments.</p> <p>Although I am not against progress on a sustainable level feel that this plan is far too ambitious for the Towcester Area.</p> <p>The infrastructure is not in place to cope with anticipated traffic levels. Traffic at existing levels is almost at capacity as can be observed regularly on A43 between McDonalds Roundabout and Bell Plantation Roundabout.</p> <p>When existing building works are completed for Housing opposite Towcester Race Course via Wood Burcote to join A43 using the Relief Road which is not as previously thought of as an A5 ByPass this additional traffic will add to an already overloaded system.</p> <p>Towcester is a small Town and does not need all these industrial units. Employment is very high so where are all the workers coming from? This will again add more traffic to the road system. I appreciate that they could come from the additional housing but it is not affordable housing and as working in warehousing is a minimum wage job workers cannot afford them.</p> <p>These are my initial thoughts and feel that more work is required before agreeing to these proposals.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility</p>	No change.



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			to Towcester town centre and preserve its rich history and identity. Whilst these sites are not allocated for housing development, affordable housing will continue to be secured on residential sites in line with the development plan policy.	
SPD013	H Garton	<p>The draft SPD needs to be significantly stronger to have any effect. At the moment it seems to reinforce the unsuitability of AL1,2,3,4 and 5 by repeating elements of the Local Plan Part 2 of which they are in breach, without giving clear guidance on how to comply with LP2. At the meeting on 13th July the Barton Willmore representative asked for comments to suggest changes to the SPD.</p> <p><u>Employment</u> The SPD states (para 1.4) the role of the new sites set out in para 13.1.5 of LP2 being to meet local employment demand and contribute to reducing the level of out commuting. Para 2.35 then quotes statistics that local employment skills are not suited to warehousing work. Yet the obvious conclusion, that the building of warehousing units will not comply with LP2 is not drawn. Guidance should be inserted that given the level of local employment skills there is no demonstrated demand for such warehousing roles. Thus such development is unlikely to meet criteria of 13.1.5 of the LP2.</p> <p><u>Traffic</u> 1.21 states that it is important to give consideration to cumulative impacts arising from other committed development. This needs to be strengthened as anyone driving in the Towcester area knows how near log jam the existing road network is. The anticipated number of additional road movements generated by AL1, 2, 3 4, and 5 will clearly bring</p>	<p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. These need to be carried out to inform planning applications with particular detail about access points. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The SPD has been amended to reflect that the visual</p>

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		<p>the strategic road network in this area to a standstill. Could the paragraph not be strengthened that the developer WILL be required to carry out such an assessment to include traffic from the adjacent sites (AL1,2,3,4 and 5) as well as the new housing developments of the Southern Extension of Towcester.</p> <p>6.41 identifies the access point from Woolgrowers as 100m from the Tove Roundabout. It does not consider any guidance as to how that traffic is going to access the roundabout without bringing it to a standstill and severely impacting the through traffic on the A43. The “hamburger” roundabout at Headington might be suitable to handle such traffic, but clearly studies would need to be done on its effectiveness at this site, and whether there were the space available. At the moment there is no consideration on the impact of this additional traffic on an already failing roundabout.</p> <p>6.60 as with Woolgrowers, the access point for traffic out of the AL4 site is identified but there is no consideration of where the traffic then goes.... across two mini-roundabouts and along country lanes, past a primary school and through Silverstone village before gaining access onto the A43.</p> <p><u>Scale of buildings</u> The SPD identifies that both small and medium units are found adjacent to the A43, and that large units are at Swan Valley on the M1. It needs to give clear guidance that there is therefore no precedent for any large units along the A43, or in a setting close to an historic market town and residential areas.</p> <p>6.47 and 6.66 need to be strengthened to show that large buildings will not be suitable. I would suggest omitting comments about exceptional circumstances which muddies the otherwise clear guidance.</p> <p>Similarly height. The largest unit locally is considered to be the Screwfix Building south of the A43. This is 9m high, which should be set as the clear limit for these developments. Given</p>	<p>impacts on the roads would be severe.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>The SPD has been amended to reflect that the visual link between the spire of Greens Norton Church and Easton Neston House.</p> <p>With regard to AL3, any revised planning application will have to comply with the parameters set out</p>	<p>link between the spire of Greens Norton Church and Easton Neston House.</p>

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		<p>they sit on high ground and will be built on a platform, any taller will be out of scale with their surroundings.</p> <p>6.25 effectively suggests that a warehouse of 16m will have no significant visual impact. This is not true. It will be nearly twice the height of the Screwfix building and as such have a significant visual impact on the surrounding countryside. It also suggests that a 16m high warehouse will be screened by tree planting, which is not the case. It would take at least a decade for any tree to gain that height.</p> <p><u>Heritage</u></p> <p>There is no guidance to address the negative impact on the town's economic prospects that will be caused by this warehousing.</p> <p>Much of the economic activity of Towcester is due to people visiting the town, and coming to live here, to enjoy its position within the countryside and its heritage. This will all change should these warehouses be built and people will be less likely to wish to visit, work or live here.</p> <p>Comment is made that there is no longer a visual link between the spire of Greens Norton church and Easton Neston House. This is incorrect. The spire can clearly be seen from the steps of the House. Little guidance is given to reducing impact on the heritage of Towcester, Easton Neston and Caldecote.</p> <p>8.3 The SPD as is fails to give clear guidance, hence it needs to be tightened up to ensure it is fit for purpose.</p>	<p>in the relevant planning consent and the details will be subject to a further impact assessment carried out in line with the general principles set out in this SPD.</p>	
SPD014	T Peterkin	<p>In response to your recent presentations regarding the above, please find below my thoughts and concerns.</p> <p>1. I believe that it is essential that a cumulative TRAFFIC study and assessment must be carried out to cover ALL the sites – AL1-4. We know how congested the Tove/Abthorpe roundabouts become, as well as the centre of Towcester, and that our villages are used as rat-runs. National Highways and</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation</p>	<p>The SPD will be amended to confirm that the heights are indicative</p>

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		<p>West Northants Highways have repeatedly ducked this key issue. The proposed building of a roundabout on the A43 at the top of the Northampton Road junction will be an accident waiting to happen. You have motorists travelling from the Northampton direction, constantly exceeding 70 mph. You then have heavy goods vehicles exiting from the existing southbound layby, which will therefore push the existing inner lane traffic into the fast lane, prior to them braking for the roundabout. In my opinion you will need to close this existing layby completely if you are insistent on building this roundabout.</p> <p>We need ACCURATE/CONSISTENT TRAFFIC ANALYSIS.</p> <p>2. FOOTPRINTS– MAXIMUM FOOTPRINT FOR MEDIUM UNITS 5,000m2AND NO LARGE UNITS.</p> <p>The original Local Plan was intended for small and medium sized units. Keep it to that with no building exceeding 5,000m2, which is the precedent for this area. For comparison the largest units at Silverstone Circuit are 5,000m2. The SPD suggests that units over 8,000 m2 could be built on all the sites “in exceptional circumstances”. We need to have this option and ambiguity removed.</p> <p>3. HEIGHTS – KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M.</p> <p>The SPD allows for buildings on AL1 “rising to 16m” – which is too high (it is not clear whether this still allows platforms adding up to 7m); AL2’s buildings up to 12m in height and on AL4’s up to 15m high. All these are much taller than any other existing building in the area – NB Screwfix is 9.5m high. They’ll be seen for miles and will have a negative visual impact on our area.</p> <p>Finally: The existing employment space in Towcester has gradually developed over the last 30 years. Large scale, high bay logistics hubs of the sort proposed by DHL will be built and</p>	<p>implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to</p>	<p>and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		operational within 3 years. Therefore 30 years' worth of development in less than 3 years. It makes no sense.	be undertaken to best shape a proposal for each site. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.	
SPD015	N Berry	As the current owner of Jacks Hill Cafe, and Berry Cranes I took the time to visit the forum to see the Consultation display. I would like to pass on my observations/criticisms of the ill conceived plans I am seeing. Firstly in both businesses we have had little or no interest in employment from the local area. In fact in the case of the Cafe it became so hard to find employees that the business has had no option but to cease trading. And with the Crane Company out of 17 employees only three are located in Towcester of which 2 have relocated and are sharing a house for there convenience. The rest all travel from surrounding areas which in turn means extra traffic and pollution coming in and out of an already over burdened road network. What if anything are the local authorities, highways or developers doing to the road	The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment. There is a high employment rate across the West Northamptonshire area. However, the maintenance and delivery of new employment space is	No changes made.



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		<p>network to mitigate the environmental impact that thousands of extra vehicles both small and large will bring to the area? Secondly the impact these massive buildings will have on light, environmental and noise considerations.</p> <p>Braking it down the shadows and direct obstruction that these buildings will have in obstructing natural light to road networks and neighbouring residents. The environmental impact and draw on local resources of these massive buildings and the thousands of commercial vehicles that will service them. And then the noise impact from these same buildings and vehicles servicing these sites, especially if they are supporting refrigerated industry. Note these are 24 hour operations in a rural area, sound not only amplifies at night it also travels in whichever direction the wind blows, in a rural area with little or no protection even residential areas miles away who can have there peace and tranquility ruined. What is going to be done to prevent it?</p> <p>Thirdly I have real concerns about what would be the protocol if one or more of these massive buildings were to catch fire including the vehicles that are servicing them. We all know that emergency services are stretched beyond believe at the best of times. What proposals have the local authorities got to enhance these, and rehouse local residents if evacuation was required? I actually have no problem with new infrastructure that can benefit and enhance the local community i.e. the new blue hub and the improvements to the Bell Plantation. These others however are ill thought out ridiculous proposals that should never have been given the light of day.</p>	<p>essential to maintain this trend and to ensure we maintain a strong and competitive economy.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction</p>	

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			of the decision maker. Emergency and fire safety procedures will need to be in place.	
SPD016	J Garton	<p>In order to be fit for purpose the Supplementary Planning Document needs to be strengthened significantly. Several areas are too weak.</p> <p><u>Employment</u> The stated justification for these warehousing sites under the local plan to meet local employment demand and to contribute to reducing the level of out commuting. (para 13.1.5) Para 2.35 then demonstrates that the resident workforce is not suited to warehousing work. Therefore the warehouses are not justified under the Local Plan, but this is not stated in the guidance. It needs to be.</p> <p><u>Traffic</u> 1.21 states that it is important to give consideration to cumulative impacts arising from other committed development. Clear guidance needs to be given that these cumulative assessments will be required of any application. It is clear that the strategic road network in the Towcester area is already near breaking point and will not tolerate the additional volumes of traffic generated by these developments in addition to new warehousing at J15, 15A and 16 of the M1 and the Southern Extension of Towcester. Similarly the Tove Roundabout is already failing and will not cope with the additional traffic volumes. Consideration needs to be given on how to make this roundabout fit for purpose in the light of these developments, to avoid adversely effecting the economic prospects of Towcester.</p> <p><u>Scale of buildings</u> The SPD needs to give clear guidance that there is no precedent for any large units close to a market town and</p>	<p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>residential areas, or along the A43. Nor is there any precedence for units of more than 9m high (the Screwfix Building).</p> <p>6.25 suggests that a warehouse of 16m will have no significant visual impact. At nearly twice the height of the Screwfix building such a building would have a significant visual impact on the surrounding countryside.</p> <p><u>Heritage</u></p> <p>Much of the economic activity of Towcester is due to people visiting the town, and coming to live here, to enjoy its position within the countryside and its heritage. Guidance needs to be given on how to protect this heritage, through limiting traffic, noise light and air pollution.</p>	<p>of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping.</p>	
SPD017	Mr & Mrs Clark	<p>As residents of for the last sixteen years we have noticed the volume of traffic has increased over these years on the A43 and A5 .</p> <p>Main concerns are as follows –</p> <ol style="list-style-type: none"> <li>1. Has there been a independent Traffic and assessment carried out for ALL THESE PROPOSED SITES ?</li> <li>2. Tove roundabout after an expensive update - will this roundabout be able to cope with the new volume of traffic ?</li> </ol> <p>With accidents on the M1 between junctions 13 - 15 north and south the A43 and A5 are at gridlock most of the time during the day. This affects Towcester and the surrounding villages with the local rat runs being used more. The lane at Tove roundabout for Green's Norton is not safe if you are the third car depending on vehicle size . The new planned roundabout</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations.</p> <p>This SPD will be a material planning consideration in the determination of future planning applications.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation</p>	No changes necessary.

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		<p>at the Hulcote turning will make that turning safer but not help with traffic congestion on the A43/A5 and particularly the Northampton Road which will become another rat run coursing heavy build up of traffic at the lights in Towcester. Maybe it needs a Hamburger roundabout to keep the flow of traffic going on the A43 ! You also have the big development going on at the bottom of the A5 twice this week it took my husband 85 minutes to get home from form work due to problems at the bottom of the A5 usually take 40 mins</p> <p>3. Height and Size of Buildings - I thought the original Local Plan for small and medium size units was not to exceed 5,000m . The height of these buildings exceeds this, if being built on the original ground level the ridge level needs to be under 10m. If I am correct Screwfix in Towcester is 9.5 high. The size and scale of these building are more suitable by the side of a motorway like the ones on the M1. As you drive past Screwfix on the A43 it is barely visible with the screening of hedges. Is this going to be the case with these new developments using existing hedges, trees but also adding to the natural landscape on a major scale.</p> <p>All of the these applications AL1, AL2, AL4 will have a huge impact on Towcester and the surrounding villages bringing with them:</p> <p>Pollution - Air, Light, Noise  Traffic congestion  Towcester - High street would suffer with the levels of traffic with the residents on the high street already having to deal with high pollution levels.  Hulcote itself will suffer with air, light and noise pollution as the traffic levels raise. We think it is very important to get the balance right as these application could set a precedent for future application on this scale. When we we never thought we</p>	<p>implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local</p>	

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		could end up living surrounded by Industrial units which could easily happen.	supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This includes issues of noise, light and air on the village of Hulcote where relevant.	
SPD018	R Calvert	Having attended the drop in event and read the SPD in detail I make the following comments. Visual Impact Development site AL1 is a development far exceeding all earlier development in the area and intrudes significantly on the rural landscape. Development of this height and scale is not in keeping with the local area and the character of middle and long distance views. The original local plan was for building	The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key	No changes made.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>developments not exceeding 5000m<sup>2</sup>, this position should be maintained along with reduced building heights.</p> <p>Traffic Impact Assessment</p> <p>The document fails to address the issue of traffic congestion and impact of these proposed developments on the existing road network</p> <p>Sites AL1 and AL2 are proposed to connect onto the A5 (AL1) and Towcester Road AL(2) Both roads connect onto the local A43 Tove Roundabout. An existing traffic congestion hot spot. The A43 Tove Roundabout is seemingly at its limit in terms of capacity already with frequent congestion at this roundabout resulting in queues along the A43 in both directions, often extending as far as the A43</p> <p>Abthorpe Roundabout , and along the A5 Corridor. Towcester Road is a non signalised arm of the Tove Roundabout with local residents suffering from queues to join the roundabout. The proposed AL2 Woolgrowers development will exacerbate congestion from Towcester Road further deteriorating the safety and capacity of the A43 Tove Roundabout and increasing journey times</p> <p>The proposed sizeable AL1 development will increase load onto the road network. Operational traffic from the development alongside workforce out commuting will further deteriorate journey time reliability and safety.</p> <p>At peak periods local villages are already seeing 'rat running' to avoid congestion at the A43 roundabouts. The introduction of the Towcester Relief Road onto the A43 via a further roundabout will further increase traffic congestion and deteriorate safety of the community.</p> <p>The existing at grade A43 roundabouts, despite recent upgrades are at /nearing capacity. Further development of this scale combined with development further to the south and north along the A5 and the A43 corridors will impact nationally the</p>	<p>considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application</p>	



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>growth of the economy in terms of journey reliability, air quality and local amenity and commuting access</p> <p>What assurances / plans are being sought for the A43 / A5 corridors to upgrade the roundabout connections to grade separated junctions? Such improvements are essential before considering further development.</p>	<p>stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	
SPD019	The Coal Authority	<p>Thank you for your email below regarding the draft Employment Allocations Supplementary Planning Document Consultation. The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy &amp; Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, South Northamptonshire Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc. In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>	Comments noted.	No changes made.

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SPD020	Northamptonshire Police - Crime Prevention Design Adviser	<p>Thank you for the opportunity to comment on the SPD. Whilst safety and security have somewhat oblique references in the WNJCS policy S10 and Policy SS2 of the Part 2 Local Plan there are no specific references to the need to design out crime contained within this SPD. Reducing opportunities for crime can ensure the longevity and success of commercial estates and I would request that a reference is included in the SPD in the section on Overarching Design Principles.</p> <p>Under para 5.3 include:</p> <p><b><i>The layout of each development should incorporate the principles of Secured by Design thereby minimising the opportunities for crime and creating a sustainable development.</i></b></p> <p>If the phrase 'secured by design' is not acceptable then '<b><i>Each development should demonstrate that the principles of designing out crime have been incorporated into the layout to minimise opportunities for crime and disorder</i></b>'.</p>	Amendments made to reflect the need to design out crime.	Amendments made to reflect the need to design out crime.
SPD021	A Rickard	<p>I strongly object to the plans for warehousing detailed in the LP2 applications in Towcester and Silverstone. The historical market town of Towcester should not be blighted by gateway development akin to Magna Park. It is inappropriate, destroys the local character, is not required to satisfy local employment shortages.</p> <p>The traffic assessment should NOT be specific to each development but should be assessed as a whole. There are other developments afoot outside this area in Baynards Green and Milton Malsor that will already impact massively on the traffic levels on the A43 and minor roads. The planned development at Shacks Barn is frankly ridiculous. This site is better suited to small business units as originally planned.</p> <p>There is insufficient major road feeds to exit the site southbound without driving through the village of Silverstone on the A413, already bypassed to prevent this sort of traffic. The</p>	<p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications. The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken</p>

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		<p>route passes the entrance to the primary school, a raised zebra crossing, three small roundabouts and 9 housing estates as well as roadside properties.</p> <p>The A5 trunk road, a very busy road through Towcester, is already used regularly as a diversionary route for the M1 whenever roadworks or frequent accidents happen (Smart motorway section). The developing Towcester bypass is not a bypass but a single lane service road, with multiple roundabouts feeding housing estates. I can say with confidence, this road will NOT be used by the industrial development employees, providers and delivery traffic as they will take the shortest route through town or the back routes through the villages. The roundabouts on the service road are not suitable for heavy HGV traffic.</p> <p>The original local plan described small to medium sized units only. This has now changed to large units. In itself, this description does not even go any way to describe the impact of the height and size of these units. There appears to be NO limit to the size of the units. Apart from the inappropriate positioning of these planned units, the traffic impact, the safety impact, the lack of sustainable transport provision, the plans describe units that are larger than those in the nearby, and more appropriately placed warehouses, at the Circuit at Silverstone.</p> <p>No amount of landscaping will disguise the planned warehouses. These units are disproportionately high with some 16 metres tall in a region where the maximum height of the current buildings is 9 metres. That is nearly <b>twice as tall as the tallest building in the location!</b> These units will be visible for miles around, causing light and sound pollution.</p> <p>The Council has spent hundreds of thousands of pounds over the years to promote South Northants as a destination for visitors - the Heart of the Shires. Instead, these plans intend to make this a vast landscape of faceless warehouses that</p>	<p>development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>The SPD has been produced in an accessible format in an attempt to be as clear as possible for consultation purposes. The public consultation has also been structured to aid understanding including consultation drop in event, exhibition boards, opportunity to speak with officers and a set of Frequently Asked</p>	<p>to best shape a proposal for each site. A glossary has been added to the SPD to help useability.</p>

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		<p>overwhelm the local character and eat up whatever green spaces we have left.</p> <p>There are already huge warehouse developments at J15, J15A and J16 of the M1. These locations are suitable for this type of major development and have access to the M1.</p> <p>The development in Brackley contains smaller units, situated low down in the landscape to reduce visual impact, the town already has a suitable duelled bypass.</p> <p>The planned development of the Rail Terminal is Blisworth/Milton Malsor is akin to 30 Magna Parks together in one place.</p> <p>We have DIRFT just up the A5 in Crick. We have multiple Magna Parks within 30 miles.</p> <p>There are plans for a huge warehouse/distribution centre just over the border in Baynards Green.</p> <p><b>We do not need another three or four warehouse depots in South Northants and especially as a gateway to an historic market town.</b></p> <p>The document is not written in a very user friendly form. It skips and changes throughout and includes various planning and construction terminology that requires research by the reader.</p> <p>This document needs to be structured clearly and written in simple English. The community deserves to know exactly, clearly and succinctly what is being planned and what that means to them.</p> <p>Finally, let me refer to the local employment situation. There is very low unemployment in the South Northants region. There are, however, a high number of small businesses and one of the highest percentages of small office/home office in the country. We are already served by small business units in York Farm, Towcester, Whittlebury, Shacks Barn, Burcote Park, Silverstone Circuit, Pury Hill,</p>	<p>Questions hosted on the Council's website.</p> <p><b>Can we add a glossary?</b></p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.</p> <p>Generally speaking there is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	

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		<p>The Mill, Caswell Park and the Old Greens Norton Road behind Tesco. We need small and medium sized business units to support the growth in the business types that are so predominant in the area not huge warehouses.</p> <p>If you look at the number of positions needing to be filled, the demographic of the local workforce and the strong likelihood of employees being recruited from outside the region, you will immediately see that these positions are very unlikely to be filled by local employees but will definitely contribute to the traffic chaos already impacting the area. In fact, if some of the warehouses are automated, the staffing levels are likely to be low so there will be no benefit to the local communities whatsoever apart from some compensatory 106 money which will probably be directed to other areas NOT affected by the development but under the control of the WNC.</p> <p>Warehouse and driving jobs are already available in established locations. It is only 9 miles to J15a and Swan Valley. 10 miles to J15 and access to Brackmills. 9 miles to Brackley. 1 mile to the Circuit. 17 miles to the industrial areas of Milton Keynes. 7 miles to the industrial areas around Buckingham. 15 miles to the industrial areas in Banbury.</p> <p>Adverts have already started going out as far afield as London for positions in South Northants for warehouse workers and drivers. These adverts include the offer of transportation by minibus to the location. Provision for sustainable transport for any locals is already planned to break the rules regarding the minimum safe width of a shared cycle/pedestrian path on the route up Northampton Road. Any pedestrians would need to cross a very dangerous, busy, traffic controlled roundabout to access the site of the proposed DHL building, for instance. Our bus services are so few and far between, they are not available for the Bell Plantation or Shacks Barn in Silverstone. Cyclists cannot safely negotiate the journey along the A5 or A43 to</p>		

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		<p>access these sites. Because of the location of the units and the assumed location of the employees by the big corporates, no other provision has been allowed for. Very few employees are GOING TO BE COMING FROM TOWCESTER and this needs to be addressed in the traffic and sustainable transport assessment.</p> <p>In all, these plans are not suitable, not acceptable and not justified and we demand the council refuse planning permission based on the very real issues above.</p>		
SPD02 2	Sport England	<p>Thank you for consulting Sport England.</p> <p>In reviewing the document Sport England do not wish to make any comments.</p>	Comments Noted	No changes made.
SPD02 3	T Movessian	<p>I am writing to you to voice huge concerns with regards to the Podium development and various others around Towcester. I have lived in Whittlebury for over 28 years and extremely worried at the thought of our village - which is already been used as a through road these days due to poor conditions on surrounding roads - having lorries thundering up and down at all times of the day.</p> <p>Please see the below points which further highlight mine and the communities concerns.</p> <p>1. <b>TRAFFIC</b> – A cumulative Traffic study and assessment must be carried out to cover ALL the sites We know how congested the Tove/Abthorpe roundabouts become, as well as the centre of Towcester, and that our villages are used as rat-runs. National Highways and West Northants Highways have repeatedly ducked this key issue. We are concerned about HGVs using the A413 through Silverstone and increased rat running through Whittlebury. We need <b>ACCURATE/CONSISTENT TRAFFIC ANALYSIS.</b></p> <p>1. <b>FOOTPRINTS</b>– The original Local Plan was intended for small and medium sized units only. For comparison the largest</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. This has included site context from Whittlebury.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>



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		<p>units at Silverstone Circuit are 5,000m<sup>2</sup>. The SPD suggests that units over 8,000m<sup>2</sup> could be built on all sites 'in exceptional circumstances. We need to have this option removed. <b>MAXIMUM FOOTPRINT FOR MEDIUM UNITS SHOULD BE 5,000m<sup>2</sup> AND NO LARGE UNITS.</b></p> <p><b>HEIGHTS</b> – the SPD allows for buildings on AL4 up to 15m high which is much too high for a site with wide visual impact; AL1 “rising to 16m” – which is too high (especially if they are built on raised platforms adding up to 7m); AL2 up to 12m in height. All these are much taller than any other existing building in the area – NB Screwfix is 9.5m high. <b>KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M.</b></p>	<p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with</p>	

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			the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.	
SPD02 4	C Purvey	<p>I am writing to voice my concerns over the three proposed new warehouse sites.</p> <p>The buildings proposed are not in line with a small market town and will not benefit the Towcester and surrounding village people as the population demographic of warehouse operative means that people will be shipped in from external towns. There is zero unemployment within the West Northants area. Smaller units with a differing job diversification would be far better placed both for job prospects and aesthetically.</p> <p>The physical size of the warehouses will be viewed from every surrounding village as huge carbuncles on the landscape, the height is far above anything else and will dwarf the Town There are enormous warehouse sites just a couple of miles up the road off Junction 15 and 18 of the M1 with far better road coverage and access and with little or no impingement on local villages as they are out of town. Brackley is a small town with good road access and medium sized businesses. This enhances the town. The proposed sites around Towcester will do nothing of the sort.</p> <p>The town planning and highways cannot in their right mind think that a minimum of 350 vehicles per hour at peak times, just from DHL, will do anything but exacerbate the already congested and gridlocked roads surrounding the A5 and A43. Not only on standard weekdays is Towcester gridlocked, but at least once per week when accidents cause closures on the local motorways, Towcester is impassable. Had a twin lane bypass been approved this may have helped Towcester but a single lane 'estate' road will do nothing to alleviate the current</p>	<p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment. Generally speaking there is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy.</p> <p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	No changes made.

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		<p>road issues, and will likely cause more rat runs and accidents with frustrated drivers trying to circumvent the bottlenecks. Please re think these plans before it's too late and Towcester becomes blighted forever. Smaller business developments, a proper bypass and smaller building structures will help everyone.</p>	<p>development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other</p>	

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			material planning considerations. Any harm would need to be outweighed by benefits.	
SPD02 5	R Issott	<p>I attended the drop in session at the Forum to discuss the Supplementary Planning Guidance document. I believe the document needs to incorporate the following points.</p> <ol style="list-style-type: none"> <li>1. A cumulative TRAFFIC study and assessment must be carried out to cover ALL the sites – AL1-4. We know how congested the Tove/Abthorpe roundabouts become, as well as the centre of Towcester, and that our villages are used as rat-runs. National Highways and West Northants Highways have repeatedly ducked this key issue. We do not have the road infrastructure to cope with developments of this type. We need ACCURATE/CONSISTENT TRAFFIC ANALYSIS.</li> <li>2. FOOTPRINTS– MAXIMUM FOOTPRINT FOR MEDIUM UNITS 5,000m2AND NO LARGE UNITS. The original Local Plan was intended for small and medium sized units. Keep it to that with no building exceeding 5,000m2, which is the precedent for this area. For comparison the largest units at Silverstone Circuit are 5,000m2. The SPD suggests that units over 8,000 m2 could be built on all the sites “in exceptional circumstances”. We need to have this option and ambiguity removed.</li> <li>3. HEIGHTS – KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M. The SPD allows for buildings on AL1 “rising to 16m” – which is too high (it is not clear whether this still</li> </ol>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the</p>	The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.

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		<p>allows platforms adding up to 7m); AL2's buildings up to 12m in height and on AL4's up to 15m high. All these are much taller than any other existing building in the area – NB Screwfix is 9.5m high. They'll be seen for miles and will have a negative visual impact on our area.</p> <p>Finally: The existing employment space in Towcester has gradually developed over the last 30 years. Large scale, high bay logistics hubs of the sort proposed by DHL will be built and operational within 3 years. Therefore 30 years' worth of development in less than 3 years. It makes no sense.</p> <p>These concerns are shared by thousands of local residents, supported by our local MP, numerous councillors, and all parish councils of the surrounding area. WNC is fully aware of the level of concern by the local community.</p>	<p>local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	

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SPD026	Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p><b>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</b></p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p><b>Strategic Environmental Assessment/Habitats Regulations Assessment</b></p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>	Comments noted. The need for a SEA has been considered for this SPD and owing to the Local Plan Part 2 having had a sound SEA / HRA, the SPD does not require one.	No changes made. However the LP2 has undergone a full assessment under the Strategic Environmental Assessment and Habitats regulations. This was considered at the Examination in Public on the LTP2 and legal as well as procedural requirements.
SPD027	D Cranwell	<p>Members of SNATRA attended the consultation display at the Forum Towcester and spoke with three of the members of the WNC team.</p> <p>We were particularly interested in the fact that the employment planning was identifying sustainable travel as a design</p>	The SPD refers to the need for sustainable travel but this will be requirement will be informed by a transport assessment and travel plan at the planning application stage.	No changes made.



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		<p>principle, a very simple reference and statement was made, but without any detail of what should be provided as a minimum. As the sites for employment included those in the Towcester area along the A5/Bell Plantation and Whittlebury, we considered that the planners had concluded that merely mentioning Active Travel Routes and sustainable travel was sufficient to placate those with concerns such as SNATRA in respect of the increased traffic both for supply/distribution and the employed going to and leaving their place of employment. The maps displayed showed the approach roads to the west as far as Silverstone and no further, therefore it is apparent that no thought had been given to the effect of this increased traffic between Silverstone and the M40 via both the A43 and the B4525 (Welsh Lane), no doubt there will also be an effect on the traffic through Farthinghoe or its proposed relief road, whenever that is built. However, as it is well known traffic from the north and northwest exits the M40 at Banbury and travels via the B4525 (Welsh Lane) to access the A43 travelling east and traffic from the south and southwest exits the M40 to access the A43 at the Cherwell Valley Interchange also to travel east and northeast.</p> <p>Potential employees at the proposed employment allocation hubs in south Northants area of WNC who live in the area beyond Silverstone to the west will also have no alternative but to undertake "private car journeys" in order to access the employment areas.</p> <p>Towcester is inextricably linked to major national road networks, namely the A5, the A43, the M1 and the M40 (via both the A43 and the incorrectly designated B4525) and therefore the proposals must take into account the requirement for ATR/SUP's to provide "safe and suitable means of access" beyond the 5-kilometre radius indicated on the plans. It must be pointed out however, that details of the required "safe and</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. The desire to create active travel routes between Northampton and Towcester is beyond the scope of this SPD.</p>	

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		<p>suitable means of access” were not detailed on any plan submitted as part of the consultation.</p> <p>It is our opinion that the existing road network between the two motorways (M1 &amp; M40) is totally inadequate to cope with the increased volume of traffic the proposed employment hubs would generate. The need therefore is not only for safe and suitable alternatives, but also for improved roads to be constructed.</p> <p>We still await the final design decision regarding the overbridge carrying the A43 over the new HS2 line just East of Brackley, although this is an essential element of the proposals included in the Brackley/WNC Local Cycling &amp; Walking Infrastructure Plan. (LCWIP) and as we have made known to Towcester Town Council previously that LCWIP proposal terminates at Silverstone and does not continue eastward to Towcester, neither does it include the B4525 between the A43 at Syresham &amp; Banbury.</p> <p>It would appear that no consideration has been given to connecting to or linking the required “safe and suitable means of access” to the proposed Brackley/WNC LCWIP. In fact, no detail of the safe and suitable means of access has been given in the plans, even though the design principles (Copy extract below) state that planning permission requires this “safe and suitable means of access for all people (including pedestrians, cyclists and those using vehicles) without the need for private car journeys.”</p> <p>Instead of paying lip service to Active Travel and Sustainable Travel alternatives the Modifications proposed in the Northampton Local Plan Part 2 &amp; South Northamptonshire Part 2 Local Plan Employment Allocations Supplementary Planning Document Consultations must provide Active Travel Routes/Shared Use Paths (ATR/SUP) from Northampton to Towcester to the east of Towcester and from Brackley to</p>		

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		<p>Towcester to the west. In addition ATR/SUP must be provided along the B4525 between the A43 Syresham and Banbury. The full details of these routes must be included in the plans mentioned at the opening of this paragraph, otherwise it is clear that the planners intend for all traffic to be via motorised transport both for goods and employees and that the statement in the Design Principles is nothing more than a Red Herring. Without these ATR/SUP's being provided, under the Design Principles, within Policy SS2 General Development and Design Principles, planning permission cannot be granted for the proposed South Northamptonshire Local Plan Part 2 2011-2029 and the Employment Allocations Supplementary Planning Document.</p> <p>It should also be pointed out that without the inclusion of the ATR/SUP in the A43 overbridge to the East of Brackley, the A43 element of the LCWIP could not be completed. Therefore it would be impossible to provide the "safe and suitable means of access" as required in the above Design Principles, so once again Planning Permission could not be granted.</p> <p>SNATRA have no doubt that Towcester Town Council might also have concerns regarding the lack of provision of ATR/SUP along the A5 both north and south of Towcester.</p> <p>SNATRA are not offering any comments on the justification of the plans and the proposals seemingly to make Northamptonshire the centre of the ARC by both Central and Local government, if it does happen, then it must happen with the above provisions as a minimum.</p>		
SDP028	S Brackpool	<p>Members of SNATRA attended the consultation display at the Forum Towcester and spoke with three of the members of the WNC team.</p> <p>We were particularly interested in the fact that the employment planning was identifying sustainable travel as a design</p>	The SPD refers to the need for sustainable travel but this will be requirement will be informed by a transport assessment and travel plan at the planning application stage.	No changes made.

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		<p>principle, a very simple reference and statement was made, but without any detail of what should be provided as a minimum. As the sites for employment included those in the Towcester area along the A5/Bell Plantation and Whittlebury, we considered that the planners had concluded that merely mentioning Active Travel Routes and sustainable travel was sufficient to placate those with concerns such as SNATRA in respect of the increased traffic both for supply/distribution and the employed going to and leaving their place of employment. The maps displayed showed the approach roads to the west as far as Silverstone and no further, therefore it is apparent that no thought had been given to the effect of this increased traffic between Silverstone and the M40 via both the A43 and the B4525 (Welsh Lane), no doubt there will also be an effect on the traffic through Farthinghoe or its proposed relief road, whenever that is built. However, as it is well known traffic from the north and northwest exits the M40 at Banbury and travels via the B4525 (Welsh Lane) to access the A43 travelling east and traffic from the south and southwest exits the M40 to access the A43 at the Cherwell Valley Interchange also to travel east and northeast.</p> <p>Potential employees at the proposed employment allocation hubs in south Northants area of WNC who live in the area beyond Silverstone to the west will also have no alternative but to undertake "private car journeys" in order to access the employment areas.</p> <p>Towcester is inextricably linked to major national road networks, namely the A5, the A43, the M1 and the M40 (via both the A43 and the incorrectly designated B4525) and therefore the proposals must take into account the requirement for ATR/SUP's to provide "safe and suitable means of access" beyond the 5-kilometre radius indicated on the plans. It must be</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. The desire to create active travel routes between Northampton and Towcester is beyond the scope of this SPD. Provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of</p>	

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		<p>pointed out however, that details of the required “safe and suitable means of access” were not detailed on any plan submitted as part of the consultation. It is our opinion that the existing road network between the two motorways (M1 &amp; M40) is totally inadequate to cope with the increased volume of traffic the proposed employment hubs would generate. The need therefore is not only for safe and suitable alternatives, but also for improved roads to be constructed.</p> <p>We still await the final design decision regarding the overbridge carrying the A43 over the new HS2 line just East of Brackley, although this is an essential element of the proposals included in the Brackley/WNC Local Cycling &amp; Walking Infrastructure Plan. (LCWIP) and as we have made known to Towcester Town Council previously that LCWIP proposal terminates at Silverstone and does not continue eastward to Towcester, neither does it include the B4525 between the A43 at Syresham &amp; Banbury.</p> <p>It would appear that no consideration has been given to connecting to or linking the required “safe and suitable means of access” to the proposed Brackley/WNC LCWIP. In fact, no detail of the safe and suitable means of access has been given in the plans, even though the design principles (Copy extract below) state that planning permission requires this “safe and suitable means of access for all people (including pedestrians, cyclists and those using vehicles) without the need for private car journeys.”</p> <p>Instead of paying lip service to Active Travel and Sustainable Travel alternatives the Modifications proposed in the Northampton Local Plan Part 2 &amp; South Northamptonshire Part 2 Local Plan Employment Allocations Supplementary Planning Document Consultations must provide Active Travel Routes/Shared Use Paths (ATR/SUP) from Northampton to</p>	<p>walking and cycling links between the site and Towcester town.</p>	

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		<p>Towcester to the east of Towcester and from Brackley to Towcester to the west. In addition ATR/SUP must be provided along the B4525 between the A43 Syresham and Banbury. The full details of these routes must be included in the plans mentioned at the opening of this paragraph, otherwise it is clear that the planners intend for all traffic to be via motorised transport both for goods and employees and that the statement in the Design Principles is nothing more than a Red Herring. Without these ATR/SUP's being provided, under the Design Principles, within Policy SS2 General Development and Design Principles, planning permission cannot be granted for the proposed South Northamptonshire Local Plan Part 2 2011-2029 and the Employment Allocations Supplementary Planning Document.</p> <p>It should also be pointed out that without the inclusion of the ATR/SUP in the A43 overbridge to the East of Brackley, the A43 element of the LCWIP could not be completed. Therefore it would be impossible to provide the "safe and suitable means of access" as required in the above Design Principles, so once again Planning Permission could not be granted. SNATRA have no doubt that Towcester Town Council might also have concerns regarding the lack of provision of ATR/SUP along the A5 both north and south of Towcester. SNATRA are not offering any comments on the justification of the plans and the proposals seemingly to make Northamptonshire the centre of the ARC by both Central and Local government, if it does happen, then it must happen with the above provisions as a minimum.</p>		
SPD029	T Hearty	<p>Please find my feedback below regarding my opposition to the development of AL1 along the lines of the current planning proposals.</p> <ol style="list-style-type: none"> <li data-bbox="584 1318 904 1350">1. Lack of Due Process</li> </ol>	The Local Plan Part 2 was considered to be legally and procedurally compliant and sound by an independent Planning Inspector appointed by the Secretary of State.	No changes necessary.



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The approval of the Local Plan Part 2 did not follow due process and the Plan should be revisited in its entirety. Specifically the inclusion of a site for Towcester Town FC to build football pitches. [Redacted text]. AL1 would never have received the support it has by the council if the Towcester Town FC plans had not been pivotal. The approval of the Local Plan was flawed from the outset in terms of failure to follow due process. The plan needs to be thrown out on this basis alone.</p> <p>2. Traffic The impact of the development on the local road network makes this development unsustainable. The Traffic Assessments for this site are inadequate and completely fail to provide for the high volume of traffic, including HGVs, that will be generated. When main routes are congested, traffic will use local roads unsuitable for high volumes and large vehicles. The A43/A5 junction is already experiencing traffic chaos and a high number of Road Traffic accidents.</p> <p>3. Poor employment opportunities Large volume warehouses will not provide the local employment levels that Small Medium Enterprise businesses would provide and which was expected in the designation within the Local Plan. A greater number of smaller units will provide better quality and a greater quantity of employment opportunities.</p> <p>4. Infrastructure The site does not demonstrate a comprehensive planning approach in terms of strategic planning for infrastructure. There are inadequate plans for cycle/pedestrian/public transport access. Proposals for large scale high volume warehouses are neither demonstrably subservient nor complementary in scale to the existing industry in Towcester as required by the Local Plan.</p> <p>5. Ill considered benefit to local community</p>	<p>Following the adoption of the Local Plan Part 2, there was a 6 week opportunity to Judicial Review. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>These documents will be considered in due course against the planning application for AL1.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. However, there may be the opportunity for development</p>	

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		<p>Football pitches benefit a minority of the population and do nothing to mitigate the detrimental effects of this development to the area as a whole. Building football pitches next to an area producing high emissions from distribution vehicles is not compatible with the delivery of those pitches within the parameters of a sustainable environment.</p> <p>6. Size and footprint The Visual Impact Assessments for this site are biased in favour of the development and are not objective. The building of these huge warehouses will be a eyesore for miles around. This development does not adhere to the design and place shaping principles required both under SS2 and by the National Planning Protocol Format.</p> <p>7. Visual Sensitivity The Council's study sets out that there is a need for greater sensitivity in developing areas along the northern and north-eastern edges of the AL1 site, ie: near to Caldecote. Despite this the proposal is for the most intrusive (tallest) structure to be sited at this end of the AL1 site. This does not make any sense whatsoever. And the football pitches are to be located in the middle of the development surrounded by warehousing on all sides (including the AL3 development). It would make eminently more sense, if this ill thought out scheme does receive approval, to locate the football pitches at the northern-most end of the site. This would offer more protection to the visual sensitivity of that part of the site whilst also being a better, healthier environment for those using the pitches. It would also offer more of a barrier to individuals - especially children - seeking to risk crossing the A43 by foot to use these facilities if they were placed further away.</p>	<p>proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area. Large proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by the benefits. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This includes communities at Caldecote.</p>	
SPD030	C Brocklehurst	Firstly, there is genuine disquiet & perhaps even questions regarding the legality about the manner in which SNC drafted	The Local Plan Part 2 was considered to be legally and	

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		<p>its Local Plan Part 2. This was put in place in the dying days of South Northants. Council before the unitary councils were created, was not open to public enquiry due to Covid-19, was seemingly rushed through without proper analysis or full scrutiny and no clear thought as to the implications of what was being agreed, leaving WNC with the deeply unpopular consequences. An SNC Councillor has since declared a conflict of interest due to a very old friendship with the owners of Shacks Barn, Whittlebury (site AL4) but this was apparently not declared at the time. I trust that the Consultation Response Team have the courage and sense to mitigate the errors of SNLP2 and not make a trite statement that lessons have been learnt. The above aside and moving on to WNC's Joint Core Strategy, I am glad that it is acknowledged in point 2.11 that there are concerns about an over reliance upon one industry, namely warehousing and that opportunities should be created to provide diverse employment opportunities &amp; this in an area with one of the highest densities of jobs to people ratio in the whole of the UK of 0.95 to 1.0 which raises the question as to whether there are sufficient local people looking for jobs in the warehousing sector. The majority of residents in South Northants. work in managerial, skilled and technical jobs, so much so that the applicant for AL1(WNS/2021/1819/EIA) has stated that it will need to bus in employees from areas with a lower social demographic; in turn this would be at odds with WNC's green commitments and pledge to become carbon neutral. WNC's document goes on to state that "delivering new space for the warehouse sector on a trend-based trajectory, would not be desirable or sustainable in the long term to achieve a balanced economy", so why in the face of WNC's own evidence are they considering giving permission for so many more warehouses? Points 2.12 &amp; 2.13 WNC acknowledges in line with the NPPF, that brown field sites</p>	<p>procedurally compliant and sound by an independent Planning Inspector appointed by the Secretary of State. Following the adoption of the Local Plan Part 2, there was a 6 week opportunity to Judicial Review. The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. However, there may be the opportunity for development proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area. Large proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by the benefits. The Highways Authority (and where relevant National Highways) will be</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment</p>

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		<p>should be sought and the Council are, I am sure, aware that farm diversification does NOT mean building warehousing on agriculture land, that is not the purpose of the legislation. The war in Ukraine has brought into sharp focus how dangerous it can be to rely on others for food and taking agricultural land out of food production for housing, industry or solar fields thereby threatening our food security is something that must be considered very carefully, before decisions are made. The more food imported into the area whether by air miles or long distance transport is again at odds with WNC's green commitments. Point 2.17 Modal Shift! A fine aim, but currently and in the near foreseeable future completely unachievable. The proposed site AL4 has no public transport links and it is totally unrealistic to think that those employed there will use sustainable methods of transport. There is no pedestrian access, bicycle riders would risk injury on the A43 dual carriageway, no bus service and no mention in the plan of providing minibus services to potential employees. Rural bus services are always the first to be cut by local authorities and even where they do exist, the timetables often do not fit with working hours. The idea of building warehousing at Shacks Barn, Whittlebury (AL4) has met with heavy and justifiable criticism from the parish councils of Silverstone &amp; Whittlebury on the grounds that 60% of HGVs and LGVs from the site would be using the A413 through those villages day and night, passing two primary schools, rattling down local roads, emitting unacceptable &amp; possibly illegal levels of NO2 and noise. WNC's transport assessment is inadequate and in contravention of paragraph 85 of the NPPF that requires commercial development in rural areas do not have an unacceptable impact on local roads; furthermore, the application is not in compliance with the requirements of SNLP2 either. The obvious answer is not to build B8 warehousing at this site and to keep it as light industrial/offices for the use of local</p>	<p>consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduce the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of walking and cycling links</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking</p>	<p>and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>people and not for the use of multinational/national companies. AL4 – Visual Summary. This site sits at the local apex of National Character Area Yardley Whittlewood Ridge (NCA91) at 150 metres above sea level, which rather curiously has not been mentioned at all in WNC's joint publication with Barton Willmore, a private company specialising in commercial proposals &amp; development (end of year profit £13 million). The stand alone wind turbine at nearby Potterswood Farm is 11.1 metres high and visible to the naked eye from the Sulgrave to Helmdon road many miles away. To build warehousing 3 metres higher than this would be aesthetically and environmentally vandalism. When Silverstone track considered building a hotel next to the junction with the A43, the Planning Committee arranged for barrage balloons to be tethered at the four corners of the proposed hotel's footprint and then drove as far afield as Little Preston from where the balloons could be seen very clearly; it was not granted planning permission. Perhaps it would be an idea if the same might be considered here and dispel English Heritage's wholly inadequate assessment of the harm to the local countryside &amp; close proximity to the scheduled monument of Lordsfield Farm moated site. WNC's own viewpoint figures (49 – 60) and receptor points show how highly visible a development of this height and scale would be from a wide radius in the open country. From viewpoint 11, if you look in the opposite direction, the wind turbines near J15 of the M1 are clearly visible and are built on land 85 metres above sea level, 65 metres lower than the proposed site of AL4. Natural England state that their remit is to protect and maintain the current nucleated pattern of village settlements along the Ridge, restrict inappropriate development, limit the visual impact of any new development and ensure it is sensitively located, work with local authorities to ensure new developments are designed to minimise noise and light pollution, to protect the tranquillity of</p>	<p>into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Natural England have engaged in the process.</p>	

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		<p>the area and enhance undisturbed views from the surrounding countryside, maintain and manage strategic and elevated views across the surrounding countryside and provide a sense of history &amp; place. 15 metre high warehouses on the top of the Yardley Whittlewood Ridge are at odds with all of Natural England's remit and WNC must take the views of the Government organisation on board. AL4 – Development framework The original Local Plan was intended for small and medium sized units only with no building exceeding 5,000 sq. metres, which is a precedent for this area and compares with the largest units at Silverstone Circuit/Silverstone Park. The SPD suggests that units over 8,000 sq metres could be built on all sites AL1 – AL5 in exceptional circumstances, which is open to interpretation and an option that should be removed, so that there is a maximum footprint of 5,000 sq metres. The height of warehousing should also be restricted to no more than 10 metres high at any site. Whilst the planting of trees is always welcome, they are often planted at the height of summer and not watered (see Silverstone school as an example) because no one is responsible for them and they are neglected and die. Tree planting along the west and south west of the site has not been adequately addressed either. Building higher than the existing tree line, is as stated, only to be considered in exceptional circumstances – please could the residents of Silverstone, Whittlebury &amp; Abthorpe be advised what those might be at AL4 when warehousing is being built at AL1, 2 &amp; 3, junction 15, 15a and 16 of the M1 and along the A14 and just south of the county border at junction 11 of the M40 and WNC has stated the over building of them is not desirable or sustainable in the long term to achieve a balanced economy? Low level units yes, 12 – 15 metre high warehousing at this site, no – it is completely inappropriate in such a rural setting and NCA. No mention is made of all the attendant lighting that</p>		



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		<p>comes with developments of this kind; as this is a rural area, to be lit throughout the night has a negative effect on nesting birds, nocturnal animals and the night sky through light pollution. France has recently legislated that all such lighting should be turned off between the hours of 11 pm and 6 am to reduce the unnecessary use of electricity and to be more carbon friendly – something for WNC to consider perhaps? (see above re Natural England on this subject). Sewage and waste management. The NPPF says this must be given consideration to. In November last year, industrial waste was disposed of down the sewers from either Silverstone track or the light industrial units at Rookery Farm, Little London, Silverstone. The sewage plant that serves both Silverstone and Whittlebury had to be closed for a fortnight as unacceptable levels of ammonia were being discharged into Silverstone Brook killing aquatic life and tankers were driving up and Pitts Farm drive 24 hours a day to dispose of the effluent whilst the sewage plant was repaired and cleaned. Currently Anglian Water has great difficulty dealing with surges at the site during the Grand Prix and to have more facilities to accommodate employees at AL4 must be thought about and with the site being commercial, consideration must also be given to possible contamination either accidental or deliberate. There are so many inconsistencies relating to WNC's desire to build warehousing at AL1 – AL5 but in particular at AL4 given its rural setting, with the Council's own and national policies. WNC has failed consistently to address transport issues, additional road usage, increased levels of NO2. Whilst there has been an increase in the population of the county, the majority of those are over 60 &amp; not of working age, access issues have not been addressed, the visual impact not properly considered, the employment needs of local people are not in the warehousing industry (which is highly automated), South Northants. has one of the highest rates of</p>		

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		employment in the UK, there is considerable availability of office space, conference facilities and virtual tenancies currently available at Silverstone Park, the parish councils of Silverstone & Whittlebury have the greatest reservations about the height and scale of the site at Shacks Barn and Natural England do not appear to have been consulted – the list goes on.		
SPD03 1	M Burke	<p>I wanted to share my feedback to you after attending the above South Northants Supplementary Planning Document presentation which was discussed with Barton Wilmore Consultants and members of the WNC planning team. I cannot understand how the business model for the original local plan can be changed from accommodating small to medium businesses in the b1 usage class to suddenly accommodate b8 warehouse and distribution class as this will fall within a residential area?! I want to know from an environmental point of view how can it be justified to allow DHL and IM Properties (AL3 Site) to introduce more lorries, HGV'S and Vans onto our local roads and surrounding villages from a CO2 perspective and by increasing air pollution, noise pollution and light pollution? Their business model is 24/7 warehouse distribution with continued noise generation from such sites and floodlighting through the night..... Where is WNC's moral compass in protecting the environment, the residents of Towcester and surrounding villages and our wildlife habitat, <b>when there is a ready made solution of 1 million square foot of land available just off Junction 16 of the M1?</b></p> <p>You cannot conduct a traffic survey of the surrounding roads and vehicle usage without taking into account the cumulative effect of the already approved AL3 site at Tiffield as well. There needs to be a full and transparent traffic survey done counting in all 4 of these sites and their impacts by an expert with local knowledge of the area and the impacts of the Motorways from</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. With regard to AL3, any revised planning application will have to comply with the parameters set out in the relevant planning consent and the details will be subject to a further impact assessment carried out in line with the general principles set out in this SPD. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>both the M1 and M40 and not a 'desktop survey' completed which seems to be the norm by either the national highways agency or other council sponsored traffic consultants....</p> <p>DHL have made a big play about providing football pitches and new facilities for Towcester Town Football Club and yet we have been told for some time now that the new housing developments opposite the Towcester racecourse had 3 football pitches earmarked in their plans with ample space for Towcester Town F.C. to have been relocated there?! As DHL are not providing local employment due to their business model requiring out of town warehouse operatives then it makes no sense to allow them to build a logistics warehouse distribution site which would exceed the current 9.5 metres that was agreed within the original local plan?</p> <p>Currently the tallest commercial building around the Towcester area is Screwfix at 9.5 metres. I would not want to see anything taller as this is not acceptable for a historic market town and the surrounding villages. If these 3 proposed developments need taller buildings then they simply have to look at land available at junction 15 and 16 of the M1?! That is where these high building sites belong as they are located at the side of motorways up and down the country. Currently all of the new developments opposite the Silverstone racecourse do not exceed 9.5 metres high and the largest units at the circuit are 5,000m2. This should be the maximum applied to the SPD with 'No exceptional circumstances' allowed to go beyond this..... <b>It is very important that WNC are seen to do something positive to protect the residents of the town and its surrounding villages by applying common sense and acknowledgement of how SNC Planning have ruined the relationship between residents and both the original SNC and the new WNC UNITARY AUTHORITY</b></p>	<p>Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual</p>	

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		I would welcome your answers to my questions and feedback above please	information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The Local Plan Part 2 identifies the need for a football ground for Towcester football club on land north of Bell Plantation.	
SPD03 2	T Henderson	To whom it may concern, I would like to add my concern regarding the Shacks Barn development, as a long standing resident of I'm in a good position to know the knock on effects of even minor traffic diversion through our village so something major like Shacks barn would not be tolerable. Save Silverstone from traffic misery	The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development at Shacks Barn and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.	No changes made.
SPD03 3	P Daly	If this planning application is approved it will have a detrimental affect on those who face onto the A413 Silverstone. Not only will it increase the amount of traffic along this road but it could	The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation	The SPD will be amended to

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		<p>be dangerous to those who have to cross the road for schools, shops etc.  We had a similar problem before the by-pass was built, this is now much better although it is still used as a rat run.  A building of that height will be a blight on the landscape and the volume of traffic with not only the lorries but the traffic of those that work there.  This must not be allowed to proceed.</p>	<p>implications of the proposed development and to identify appropriate mitigation measures.  The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.  Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>
SPD034	I McCord	<p>Thank you for the time you have spent drafting the Supplementary Planning Guidance for the Employment Allocation sites in the South Northamptonshire Local Plan Part 2. In response to the consultation I have these points and recommendations to make.  <b>Background</b></p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p>	<p>Additional wording has been added regarding AL3 to set out that</p>

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		<p>When the South Northamptonshire Local Plan Part 2 was adopted by SNC in July 2020, following years of work and consultation, the employment sites within it were targeted for small to medium sized units on the sites allocated. All these sites were given the prefix AL.</p> <p>As Leader of South Northants Council at the time of adoption, in the foreword that I wrote, I made this explicit stating that the council would</p> <p><i>“aim to meet the demand for <b>small and medium sized units</b> by suitable land allocation.”</i></p> <p>The small scale nature of what the Part 2 plan envisaged was repeated at page 57. The employment sites were part of strategy to reduce out commuting and keep skilled workers in the district. Policy EMP1 Supporting Skills makes this clear. Page 121 – 122 of the Local Plan states <i>13.1.5 Strategic employment generation is focused through the WNJCS at Towcester and Brackley, Motorway junctions and at Silverstone. The district has 65 business parks and the new sites supported through the Part 2 Plan are intended to: South Northamptonshire Local Plan (Part 2) 122</i></p> <ul style="list-style-type: none"> <li>• <i>Meet local demand and strengthen the rural economy;</i></li> <li>• <i>Provide the ability to strengthen local supply chains;</i></li> <li>• <i>Local flexibility and choice of locations;</i></li> <li>• <i>Meet the demand for <b>small and medium sized units</b> and</i></li> <li>• <i>Contribute to reducing the level of out commute</i></li> </ul> <p>Page 123 para 13.2.1 states that the Towcester allocation sites AL1, AL2 and AL3 are <i>to facilitate some additional <b>small scale</b> employment opportunities to provide additional choice and opportunity for the growing population and to look to reduce out-commuting.</i></p> <p>At para 13.2.2 the Local Plan states <i>All three sites offer suitable locations for a range of new <b>small and medium sized</b> business units</i></p>	<p>With regard to AL3, any revised planning application will have to comply with the parameters set out in the relevant planning consent and the details will be subject to a further impact assessment carried out in line with the general principles set out in this SPD.</p> <p>Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. However, there may be the opportunity for development proposals to demonstrate the ability</p>	<p>alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p> <p>Wording 'in part' has been removed from the SPD.</p> <p>The SPD will be</p>



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		<p><i>including uses that are ancillary or complementary to existing or proposed B Class uses.</i></p> <p>At para 13.2.3 the Local Plan when describing the Bell Plantation site AL1, <i>represents an appropriate employment location for the provision of additional <b>small and medium sized</b> commercial buildings</i><sup>17</sup> the footnote 17 referred to stated <i>The usual definition of small and medium sized enterprises (SMEs) is any business with fewer than 250 employees</i></p> <p>This alone begs the question why global companies like DHL think it is acceptable, and policy compliant, to try to impose their plan on this site. WNC should have been very robust in telling them that this was not appropriate and put them off at an early stage.</p> <p>Page 131 para 13.3.1 when describing The Shacks Barns allocation AL4 states <i>This allocation proposes to extend the business park with a range of new <b>small and medium sized</b> business units</i></p> <p>The applications and proposals for these sites that have subsequently come in bear no relation to spirit or letter of the policy as adopted and are trying to stretch it to breaking point. This is helped in no small part by an officer team who are willing to interpret the policy in the most lax and liberal way. For example, during discussions on one of the AL sites in my ward, when I asked about where was the mix of B1, B2 and B8 as required by the policy, an officer, in all sincerity, stated that 0%, 0%, 100% would still constitute a mix. This view is clearly bonkers, but gives a fascinating insight into the thinking of the planning officers who adjudge the applications when they are submitted.</p> <p>The stated aim of the South Northants Local Plan was to identify sites that would be for small and medium size</p>	<p>to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area. Large proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by the benefits.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants</p>	<p>amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed developme</p>

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		<p>operations. The council was well aware of the strategic location and the attractiveness of the logistics industry. The accident of geography cannot be ignored, this area located mid way between London and Birmingham and gives access to 70% of the population within a 4 hour drive by truck. A full legal drive, within the hours of a tachograph, will take any truck well into Scotland and cover virtually all of England and Wales. E-retailing and the shift to online will lead to an rapid growth of home deliveries and demand for warehousing. Many want to say no. If they have ever clicked on a website and expect the goods to arrive tomorrow, or by 10pm same day, that 'amazing service' is only made possible by sophisticated logistics infrastructure. Unless there is a massive shift in the GB population this will be centred around Northamptonshire. As a direct result we have a lot of large B8 warehouses along the main strategic highways, attracting the national and global operators and driving up values, thus pricing out the local and smaller business. The local plan policy was designed to readdress that balance, not to feed into it. The policy was also wanting to address out-commuting for work. The proposals suggested will run contrary to that ambition, far from preventing and reducing the number of residents who live in the district and work elsewhere, many of the proposals for pick and pack operatives will required people to be bussed <b>into</b> the district who are non-resident. Any of the proposals that acknowledge this should be refused for the non-compliance to the existing policies. The council should seek to meet the policy aims by attracting smaller units, seedbed units, low impact business but offering skilled work and reducing travel time for those resident in the district. It is interesting to note, for example, on AL5 when the</p>	<p>towards more ambitious design standards.</p> <p>The assessment undertaken as part of this SPD is not intended to be exhaustive, as such further contextual and site assessment and design work will need to be undertaken at planning application stage.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>	<p>nt and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or</p>

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		<p>documentation that was used to promote the site with indicative layouts showed the entrance off the A5 roughly in the middle of the site. The screening opinion, recently consulted up, gave insight to their most recent thinking, showed this entrance much further up to accommodate a 350,000 sq feet monster warehouse on this site. The road, in its original position, was through this proposed building and therefore prevented it.</p> <p>It is my view that the council have been misled by the developers on this, and members were not as acutely aware of the dangers of such overdevelopment as they should have been. I am reasonably confident that should this have been indicated before adoption the council would NOT have done so in its present form and taken steps to have closed such loopholes that are currently being exploited. It would be nice to think the developers would be honourable and honour the ideas they used to get the allocation, however, I do understand that may just be a hope too far.</p> <p>Having set out the aims and objectives of the employment allocations in the South Northants Local Plan the council is now consulting on an additional Supplementary Planning Document (SPD) to give greater clarity to what it would like to see developed at these sites.</p> <p><b>Choice of Consultants</b></p> <p>I have enquired at full council as to any potential conflict of interest, but my question was not answered. What due diligence was undertaken by WNC when the choice of Barton Wilmore was made? Were the council aware that amongst their clients are DHL who have an application for site AL1 and IM Properties who have a permission for AL3?</p>		<p>the residual cumulative impacts on the roads would be severe.</p> <p>A glossary will include the terms transport assessment and travel plan to aid understanding.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate</p>

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		<p>At a recent member's briefing on this topic the consultants repeated the mantra that they thought the council should not be too prescriptive in what it was proposing. In whose interest is this advice being given?</p> <p>When the Local Plan Part 2 was being developed members were advised not to be overly prescriptive and indeed the NPPF calls for flexibility so that employment sites can change in response to local and national market changes. However, arguably, this lack of clear boundaries and expectation setting in the Local Plan has resulted in a flood of silly and highly unsuitable applications, which are way beyond what members had in mind when making the allocations. As it was not written down in an explicit way, the development community argue that this is policy compliant. This is a lesson that should be learned from the preparation of the Local Plan Part 2 and sticking to the same advice on not being prescriptive, I fear, will give the same outcome of allowing outrageously unsuitable applications for these sites all claiming to be policy compliant and in line with SPD and Local Plan.</p> <p><b>Exclusion of AL3</b></p> <p>The SPD as proposed will NOT cover AL3. It is proposed just to be applicable to AL1 (Bell Plantation / DHL site), AL2 – Woolgrowers (Services hub site), AL3 – (IM Properties site), AL4 – Shack Barns (Podium Developments site) and AL5 – Furtho Pit (Frontier Site). The stated reason is that AL3 has a permission granted and thus cannot be covered retrospectively. Whilst I acknowledge this point, the SPD should cover any</p>		<p>imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout</p>

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		<p>future development on AL3 not covered by the existing permission. For example, if that permission was not built out, any subsequent application would not have any of the design constraints imposed on it that the others have. If the development community were to think that the SPD reduces their freedom to built whatever they want AL3 could become a prized spot if not covered by the scope of the SPD. There is nothing to stop land deals where something that may prove harder to achieve on one of the other AL sites that are within the scope of the SPD get a land swap to be moved to AL3 without restriction.</p> <p>Even if built out, over time the shape of AL3 could change, units may be reconfigured to be of a size and scale not envisaged by this SPD, thus again its provisions could be defeated easily.</p> <p>It is a glaring omission on the part of the West Northants Council not to include AL3 for future developments on that site. I fully accept that the existing permission is excluded and anything built needs to follow that permission, but all future ones, or applications for any changes or expansion, should be within the scope of the SPD and its guidance followed. I trust that the links between Barton Willmore and IM Properties are not being used here to drive such a recommendation?</p> <p><b>Recommendation 1</b>  <b>Include all future development on AL3 within the scope of the SPD. This will include any changes, remodelling, extensions, renewing lapsed permissions or changes to the existing planning permission that has been granted.</b></p>		<p>the document that will seek to encourage/steer applicants towards more ambitious design standards.</p> <p>Certain wording in the SPD has been strengthened to ensure that issues such as noise and light are considered as part of the planning application process.</p>

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		<p><b>Definition of Small, Medium and Large Units</b></p> <p>The SPD is made a good attempt to define a small unit, up to 2,500 m<sup>2</sup> medium size unit, from 2,500 m<sup>2</sup> to 8,000 m<sup>2</sup> and then large being greater than 8,000 m<sup>2</sup>. I broadly welcome and support the approach.</p> <p>The reference point suggested of Swan Valley site at M1 Junction 15a is questionable. As I have said this area is in the centre of the UK logistics industry and has many mega size warehouses in the district and under construction. For example Northampton Gateway at M1 Jtn. 15. At every motorway junction in the district there are very large warehouses recently built or under construction. Given the strategic location, what constitutes large in this locality is mega large elsewhere.</p> <p>We need to keep a sense of scale, the Local Plan always wanted small and medium size buildings. My concern is that large is 8,000 m<sup>2</sup> to infinity. We should reflect in our local planning guidance that we are aware of the mega or very large category of warehouse that is often at the motorway junctions which serve the national and global strategic logistics industry. Because of our geographic location all sense of scale with warehousing is moved dramatically upward, we need to be conscious of this when thinking what is suitable for market town and rural locations.</p> <p>The use of the Swan Valley strategic site on the M1 to be a comparator for rural locations such as those in the South Northants Local Plan is inappropriate. The local plan states in the policy that proposals need to be in keeping with the surroundings. With the exception of AL3, all the other sites have industrial, retail or other units either on site or very near which act as a very good marker as to the size and scale</p>		



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		<p>envisaged by the council as the time or adoption of the local plan.</p> <p>The SPD should have a fourth category of very large which would be no more than 15,000 m<sup>2</sup>. The SPD directs that it would expect to see small and medium size units, which reinforces the policy aims in the Local Plan, but it does allow for large buildings in 'exceptional circumstances'. We need to take care that arguments will be put forward as to why there is an exceptional circumstance. However should the SPD set an upper limit on large and introduce a very large category we can allow the circumstances to be evaluated but make it clear no very large units will be allocated to these sites.</p> <p><b>Recommendation 2:</b>  <b>Update the guidance to have a fourth category of very large to reflect the strategic logistics settings of the district from above 15,000 m<sup>2</sup> giving the large category defined limits.</b></p> <p><b>Having set out that a very large category could exist the SPD should make clear that no very large units would be permitted on any site.</b></p> <p><b>Design Principles</b>  The SPD does a reasonable job in setting out the areas that are sensitive and the views and impacts that need to be considered by any applications that would come forward.  The height of the buildings is not specified or limited, rather we seek to use landscape and topographical features to try to set limits.</p>		

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		<p>Residents will want to see height limits set. Some of the proposals have alarmed residents as the height proposals. I accept that there are things that can be done to lower the ground levels and therefore reduce the impact as the measurements are from that platform and not from the existing ground levels. The use of bunds is common round these parks to give both acoustic and visual screening. The SPD should set out that if using treelines etc to set heights that bunds with tree planting on top is not an acceptable way to make a ridge height acceptable in planning terms.</p> <p><b>Recommendation 3</b>  <b>Tighten up the language within the SPD to set limits on building heights. If continuing to use geographic and topographic features to define this then make clear that tree planting on top of earth bunds is unacceptable.</b></p> <p><b>Recommendation 4</b>  <b>No building should be taller than any existing building on or in close proximity to the site. For AL1 &amp; 2 this the existing Bell Plantation complex , Old Greens Norton Road area and Tove Valley Business Park area; for AL4 the existing units at the Silverstone Business Park give a good reference and for AL5 the existing storage warehouse (Emmett's) should be the reference point, the Wolverton Mill area which in Milton Keynes municipal area does overlook it and is a reasonable reference, the Ouse Valley Park is too far away to be relevant</b></p>		

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		<p><b>Keeping Services On Site</b>  The SPD should make clear that all services and attenuation for example rain water balancing ponds must be kept on site and within the allocation area. The council should not allow the sites to gradually creep in size by allowing some of these services to be adjacent to the AL site. This would stick the small and medium size of the allocation and help ensure that policy aims of the local plan are delivered. A principle of 'dealing with your own smoke' onsite must apply.</p> <p><b>Recommendation 5</b>  <b>All services and attenuation works must be within the site allocation red line on the South Northants Local Plan Part 2</b></p> <p><b>Future Development – Units amalgamation</b>  In the same way that I have concerns about the exclusion of AL3 from the scope of the SPD, we need to ensure that this suite of policies are looking to the future and what may happen on these sites.  If designs come forward for a series of small and medium buildings what will prevent these from being joined up to make large and very large units in the future. The SPD makes it clear that small and medium are wanted and large only in exceptional circumstances. If we adopt my proposals of very large, and extend the SPD to exclude very large we will give some relief that the conversation from small to medium or medium to large cannot happen by stealth.</p> <p><b>Recommendation 6</b></p>		

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		<p><b>The SPD should give some guidance that future development will not allow for the combining of two or more smaller units to create units not envisaged in the SPD. If coupled with the recommendation on very large will allow none of those.</b></p> <p><b>Site limit for single buildings</b> The SPD should say that no one single building, including parking etc, can take up more than 15% of the total space as allocated in the Local Plan. This will continue to keep the focus on the small and medium size and also help prevent the combining of smaller units in the future.</p> <p><b>Recommendation 7</b> <b>The SPD should state that no single unit can take up more than 15% of the total area allocated in the South Northants Local Plan Part 2</b></p> <p><b>Traffic Surveys</b> The SPD does not give any guidance on the traffic issues that many of these AL sites could give rise to. I accept that any planning application must be accompanied with appropriate traffic survey and mitigation proposals, nonetheless some guidance would be welcomed. Many residents are concerned as to the traffic impact with some of the proposals that have been submitted.</p> <p>The cumulative impact of these, especially along the A43 and A5 and A508 does need to be addressed. I would like to see some guidance given that the council expects to see that a traffic survey will have impact from all</p>		

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		<p>these on the other one(s). AL1, AL2, AL3 and AL4 are all along the A43 corridor. However AL5 may impact those and these four may also impact AL5.</p> <p>Any traffic leaving AL5 with a route that involves the M40, may take the A5 toward Towcester or the A421 toward Buckingham and Brackley and then join the A43. This will impact on the movements generated by the AL1 to 4 proposals. In addition some guidance as to the scope and how wide any traffic survey should consider would be welcome. For example approx. 9 miles along the A5D at Fenny Stratford there is currently under construction 2m sq ft of warehouses. Some of this traffic will use the same stretch of the A5 as would be required for access to the AL5 Site. This needs to be included.</p> <p>It is also well known that much of the traffic that ends up in the pinch point at the village of Farthinghoe, south of the county, goes along the A422 toward Buckingham and Brackley. This village needs a by-pass that has been inexplicably shelved by WNC. These AL proposals will exacerbate this and prove the law of unintended consequences as there is a lack of strategic thinking at WNC. As well as giving answers to the immediate vicinity those further afield need to be thought about also, this SPD does not address these issues.</p> <p>We would also need to have some reference to the times when the A5 and A508 serve as the alternative routes to the M1. This is becoming a more frequent occurrence with at least an incident every couple of weeks. The traffic assessment must acknowledge the strategic role of the A5 and A508 when there are issues with the M1 via road works or traffic accidents.</p> <p><b>Recommendation 8</b></p>		

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		<p><b>The SPD should state give some indications as to what a full and comprehensive traffic survey for each of these allocations would be to include the cumulative impacts and the impact when the M1 has issues and traffic migrates to the A5 and A508 AL5 Impact on Residential Properties – Stratford Road</b></p> <p>Stratford Road has a row of homes that overlook the northern edge of AL5. This is acknowledged in the SPD and mentions that it needs to be handled sensitively. It may be more for the planning application to set out and add conditions as to hours of use, light, odour and noise pollutions. The SPD should give some indications that 24 hour working, or polluting operations along the road will not be permitted. The type of conditions that the council would be seeking would give clarity to both residents and the developers.</p> <p><b>Recommendation 9</b>  <b>The SPD should give an indication as to the type of conditions the council would seek to impose on the units near to the residential properties on AL5 to prevent noise, light or odour pollution and hours of operation.</b></p> <p><b>Clarity of Part 2</b>  The draft SPD at page 24 states para 3.2 that the role of the employment sites were in part to strengthen the local economy etc. The 'in part' addition is unwelcome. This gives a lot of wriggle room for other factors, no matter how spurious to be included 'in part'.</p> <p><b>Recommendation 10</b></p>		

Respo nse No	Respondent 's Name	Comments	Suggested Response	Suggested Action
		<p><b>Remove the words "in part" from page 24 para 3.2 to provide a more accurate representation of the Local Plan Part 2 as adopted.</b></p> <p>I trust you will incorporate these recommendations into the final draft of the SPD. I request that I am kept up to date with each development as this progresses to adoption.</p>		
SPD03 5	M Bishop	<p>With regard to the draft Employment Site Allocations Brief : Supplementary Planning Document, dated July 2022, I would like to make a comment.</p> <p>Whilst the need to limit noise pollution is referenced within the proposed Overarching Design Principles (page 62 – final paragraph), and also in Additional Relevant Policy S10 (point k.), it is not then noted within Policy SS2, which I believe to be an omission.</p> <p>Policy SS2 should be amended to include a statement that potential noise pollution should be limited so as to create no negative impact on the local environment and community; appropriate noise mitigation measures must be included where necessary.</p> <p>In this respect, for information I have attached my own assessment of the noise impact report that has been submitted as part of the current planning application for AL1. This assessment demonstrates the proposed development will have an adverse effect on the local environment and community.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>It is not possible for the SPD to make amendments to Policy SS2. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>Your noise impact report which was submitted to the planning application for AL1 will be considered as part of the determination of the planning application.</p>	No changes made.
SPD03 6	A Richards- Ellis	<p>I was unable to find the tiny url link to 2p85ssw7 as it came up with the Netherlands.</p> <p>I hope it wasn't a red herring to put people off responding to the consultation.</p> <p>I am extremely concerned about these plans and their affect on both the A5/ Towcester itself and Silverstone.</p> <p>At the Towcester site there already seems to be work being carried out as platforms of earth have been built; it certainly</p>	<p>It is unclear why the url link diverted to the Netherlands. However from this consultation response, it is evident that the consultation material was able to be found.</p> <p>The scope of the SPD is to establish general guidance and design</p>	The SPD will be amended to confirm that the heights are indicative and that



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>looks like planning consent has been assumed by the applicants. No account has been taken of the already congested A5 roundabouts and the fact that surrounding villages are being used as rat runs. It is also very concerning that increasing numbers of HGV vehicles will be using the A413 through Silverstone. There is no A43 southbound access at the Whittlebury roundabout ,therefore an increasing number of vehicles will be thundering through the village at all hours, ignoring all speed restrictions as usual. At Shacks Barn the original plan for small and medium units has been superseded by one for large units, over 8000m2 .The maximum size at the circuit is 5000. The SPD should assure that the maximum ,5000m2 ,is kept. It also allows for buildings of 15m at Shacks Barn and 16 on a 7m platform at Bell Plantation. Furthermore these buildings will not be hidden by planting and also illuminated 24/7 ,being visible for miles. The highest local building is 9.5m. Therefore the maximum size should be 10m and not lit 24/7. It is well known that there is too much light pollution already ,this affects health and quality of sleep. It does seem that no attempt has been made to take into account the historical setting of these areas or indeed, the health ,welfare and wellbeing of the local population.</p>	<p>principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree</p>	<p>further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			<p>heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties including health and welfare which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD037	S MacGregor (online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: I do not support this</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: The impact of noise, disturbance, smells it will be a huge environmental impact.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Yes</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No The high impact of on the environment. Noise. Smells. Disturbance. Impact on the countryside. Safety in the area. This development will add to dangers. Day/night traffic of lorries.</p>	<p>As part of the planning application process, any adverse impacts on communities (such as noise, disturbance and smells), the natural and historic environment and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. In terms of safety, the SPD will be amended to include reference to Design out Crime principles. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>The SPD will be amended to include reference to Designing out Crime principles.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: As above.</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: The environmental impact on of a beautiful area. The listed buildings and conservation area.</p>		
SPD038	M Laughlin (online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: sustainable transport(walking and cycling) in any meaningful degree never works and landscaping as screening can be a failure if not properly implemented and policed</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: large units can be dominating</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: there are already plenty of warehousing and employment opportunities in the area already and this includes milton keynes.The local landscape works alright as it is and a country park and an extension to the Ouse valley park is not critical</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. Sustainable transport measures will be considered. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>14 Are there any other comments you wish to make which you have not already made?            Are there any other comments you wish to make which you haven't already made?:            the surrounding area is already a pinch point for congestion and with the thousands of houses being considered for the area it would add to an already dangerous situation</p>	<p>The opportunity to extend the Ouse Valley Country Park is identified by the Local Plan Part 2.</p>	
SPD039	H Mistry (online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?            Yes            Please provide comments to support your answer:            I would like to lodge my objection regarding the planning application allocating land for employment development which expanded from the site pit inn old stratford parish land opposite the scout camp and homes in Stony Stratford Road, Cosgrove. If the plans are approved the Cosgrove village will be totally rammed by traffic which the village can hardly manage currently. The peaceful status which the Cosgrove residence have enjoyed upto now will be seriously impacted by virtue of increase in traffic which will automatically impact on the noise pollution and the safety of the local residence.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?            Yes            Please provide comments to support your answer:            No, see above comments</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?            Yes            Please provide comments to support your answer:            See my comments above</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.            The purpose of this consultation is to inform the emerging Supplementary Planning Document rather than planning applications.            In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations.            This SPD will be a material planning consideration in the determination of future planning applications.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer: see comments above</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: Not at this stage</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD040	Incomplete online response.			
SPD041	Environment Agency	<p>I refer to your consultation dated 6th July 2022 in respect of the above and wish to respond as follows:</p> <p>It is recognised that all 5 Sites are already allocated in your Council's adopted July 2020 Local Plan covering the former South Northamptonshire area.</p> <p>Furthermore, we note that sites AL1, AL2 and AL4 are subject to ongoing planning applications at the time of writing this letter (WNS/2021/1819 &amp; 2168 for AL1, S/2020/2045 for AL2 and S/2020/2337 for AL4) and that site AL 3 was subject to a planning application under reference S/2020/1644/EIA which was approved on 23rd June 2022.</p> <p>Accordingly, it is accepted that the principle of developing all 5 sites for employment purposes has already been accepted and, in the case of site AL3, the Planning Permission has established the final detail should it be implemented in that form.</p> <p>Notwithstanding this, we wish to make the following comments which we should be grateful if you could take into account where it is still possible in defining what happens on Sites AL1, AL2, AL4 and AL5 and in case Planning Permission S/2020/1644/EIA does not get implemented and a new application is received for site AL3.</p> <p>Flood risk Sites AL1, 2, 3 and 5 are in areas at risk of fluvial and/or surface water flooding. It is assumed the sequential test has been carried out to determine the appropriateness of allocating and developing these sites. Without this, we consider their allocation for employment purposes would have been unsound. Assessment of all sources of flood risk.</p>	It is agreed that the principle of developing AL1, AL2, AL4 and AL5 has been agreed as part of the LP2 and the employment allocations. The additional comments regarding the sites is welcomed and this will help to the determination of future planning applications.	The required amendments have been made to reflect comments made by the Environment Agency.



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The SPD has identified that the several of the sites either contain or are bounded by fluvial flood zones. Unfortunately, the risk of flooding from other sources, especially surface water flooding, has not been identified. The flood map for surface water identifies areas at risk of flooding that are not linked to watercourses, and it is critical that this risk was/is considered during any sequential test and the design of the development layout.</p> <p>Data quality assessment.</p> <p>The larger watercourses within these sites are modelled to indicate the general area of flood risk. The current level of information is sufficient to determine the feasibility of the developments but should not be solely relied upon to assess the risk of flooding in a site-specific Flood Risk Assessment (FRA). The developments that are bounded by or contain watercourses should be required to determine whether the best available information is fit for purpose and make improvements where significant uncertainties are identified.</p> <p>Requirement for reduction in flood risk.</p> <p>Sites AL1, 2, 3 and 4 offer opportunities to reduce flood risk downstream. AL1, 2 and 3 have the potential to attenuate and slow surface water from reaching the watercourse network through their drainage schemes. AL4 straddles the Dogsmouth Brook, providing the opportunity to expand the floodplain and/or constrict flows passing through the site.</p> <p>The wording of the SPD could be written to highlight these opportunities and link them to the requirement under the National Planning Policy Framework (NPPF) to reduce overall flood risk.</p> <p>Site AL4</p> <p>This site straddles the Dogsmouth Brook, which limits the developable area. In particular, the section of the site north of the brook will require careful consideration. It may require</p>		

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		<p>bridge access over the brook and during a flood this access may not be available.</p> <p>Groundwater and contaminated land</p> <p>From a groundwater and contaminated land point of view, we have no specific objections to these proposed employment site areas.</p> <p>The Agency's Groundwater and Contaminated Land team which cover this area advise they have had previous involvement in two of the proposed employment site areas, as summarised below:</p> <p>AL1 (approximate NGR: SP6879649983) – no previous involvement</p> <p>AL2 (approximate NGR: SP6856549580) – no previous involvement</p> <p>AL3 (approximate NGR: SP6941850149) – we have previously provided planning comments, most recently for Hybrid planning application ref S/2020/1644/EIA (our ref AN/2020/130980/01-L01, dated 20 October 2020).</p> <p>AL4 (approximate NGR: SP6834045783) – no previous involvement</p> <p>AL5 (approximate NGR: SP7859941609) - we have previously provided planning comments, most recently for scoping opinion ref WNS/2021/1985/SCO (our ref AN/2021/132551/01- L01, dated 21 January 2022).</p> <p>The sites are not in a groundwater Source Protection Zone (SPZ), but are underlain by secondary and principal aquifers. The regional use of groundwater in this area makes the sites vulnerable to pollution. The sites should be subject to Land Contamination Assessment (including a preliminary risk assessment as a first stage) following the requirements of the National Planning Policy Framework and the Environment Agency Land contamination risk management (LCRM) guidance.</p>		

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		<p>Development proposals should only be permitted where it is demonstrated that any identified contamination is capable of being appropriately remediated or rendered innocuous to make the site suitable for the proposed end use. The Environment Agency's Groundwater Protection webpages, including our Groundwater Protection Position Statements, provide information on groundwater protection including infrastructure and drainage.</p> <p>The initial designs should be flexible such that features of biodiversity value can be retained and enhanced if they are found to occur within sites. The sites may be used by including Great Crested Newts, Hedgehogs and Water Vole. Detailed ecological surveys should be undertaken to identify protected species and habitats of value. Habitats such as woodlands, trees, ponds and watercourses will be among the habitats of value on and adjacent to these development sites. Wherever possible, these should be retained on site and incorporated into the designs.</p> <p>Wildlife corridors will be important to retain or create, including 'blue' corridors of watercourses. SUDs can often be sympathetically designed to provide ecological benefit.</p> <p>Section 5. Over-arching Design Principles should include a paragraph stating 'recognise and retain important wildlife habitats and enhance these habitats to contribute to overall biodiversity net gain'.</p> <p>Biodiversity net gain (BNG) is an aim of the Local Plan Policy (<i>NE5, Biodiversity and Geodiversity: 1. Development proposals should aim to conserve and enhance biodiversity and geodiversity in order to provide measurable net gains</i>). 10% BNG becomes mandatory from 2023 under the Environment Act 2021.</p> <p>The SPD design briefs for each site should include an ecological assessment to inform design.</p>		

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		<p>Inclusion of the above comments would bring this SPD into line with the Local Plan Policy SS2: General Development and Design Principles:</p> <p><i>p. shows a detailed consideration of ecological impacts, wildlife mitigation and the creation, restoration and enhancement of wildlife corridors to preserve and enhance biodiversity</i></p> <p>Site specific comments:</p> <p>Site A5 contains a Local Wildlife Site (LWS) which is a site of county importance. This is Dogsmouth Brook Meadow LWS: a small meadow in the corner of a larger field bounded by scrub and the river. It contains red list plant species such as Hoary Plantain, which is indicative of undisturbed or old pastures. This area also supports a Nerc S.41 Habitat of Principle Importance: Good Quality Semi Improved Grassland.</p> <p>It appears that the LWS, together with Dogsmouth Brook, will be retained and will form part of a key green space which may form an extension to the Ouse Valley Park. This is welcomed. Opportunities to improve the connections across (below) the major roads in the areas should be investigated if possible (and if required). For example, improving culverts for access by riparian mammals; terrestrial mammal crossings. Enhancing connectivity through the locality would be a desirable.</p> <p>Waste</p> <p>We would like to make the following advisory comments at this stage:</p> <p>Any final development proposals must take into account the guidance on waste minimisation and waste management (storage, handling, transposition and disposal) and proposals must demonstrate compliance with waste regulatory requirements, more details are listed at:</p> <p><a href="https://environmentagency.blog.gov.uk/2021/03/25/dont-dump-it-sort-it/">https://environmentagency.blog.gov.uk/2021/03/25/dont-dump-it-sort-it/</a></p> <p><a href="https://www.gov.uk/topic/environmental-management/waste">https://www.gov.uk/topic/environmental-management/waste</a></p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Water quality/efficiency</p> <p>Although the volume of wastewater generated by these sites is predicted to be relatively modest, an additional design principle would be welcomed to protect the local environment.</p> <p>Planning applications should include evidence that foul sewers and sewage treatment facilities (of adequate design and capacity) are available to meet the demand created by new development or, where they are not available, can be provided in time to serve the development to ensure that the environment and the amenity of local residents are not adversely affected.</p> <p>Increased water efficiency for all new developments potentially enables more growth with the same water resources.</p> <p>Developers can highlight positive corporate social responsibility messages and the use of technology to help market the developments. For occupiers, lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.</p> <p>We are aware that Policy S11 of the Joint Core Strategy requires non-residential developments over 500m<sup>2</sup> in gross internal floor space to meet at least BREAM very good standards or the equivalent in any subsequent standards. Due to their potential impact on water supply, we would recommend that all new non-residential development of 1000 squares metres gross floor area or more should be encouraged to meet the BREEM 'excellent' standards for water consumption or the equivalent in any alternative set of standards.</p>		

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		<p>If the developer intends to abstract more than 20 cubic metres of water per day from a surface water source for these sites, for example, from a stream or from underground strata (via borehole or well) for any particular purpose, then they will need an abstraction licence from the Environment Agency. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. Certain private and small water supplies do not require a licence to abstract water. Therefore, we are not necessarily aware of their existence. The locations of private domestic sources may be held by the local authority on the register required by Regulation 14 Private Water Supplies Regulations 2016.</p> <p>I hope the above comments are of assistance in progressing the SPD. Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.</p>		
SPD04 2	P Vaughan	<p>Both my wife and I have recently moved into the village. The concept of an increase in HGV traffic through the Village due to this proposed development is ridiculous. How this project ever got this far down the line beggars belief.</p> <p>I am not opposed to development within the community and if all traffic to Shacks Barn entered and exited via the A43 then we would have a different opinion. However if traffic is going to be via the A413 then we are both totally opposed to it.</p> <p>The traffic congestion on the A43 is increasing and these types of warehousing projects will only compound the problem.</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment</p>

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		<p>Bell Plantation.  All warehousing should be restricted to a max of 10 Metres.  The same height restriction should also apply to Shacks Barn.  Please do your utmost for the frustrated retirees in Silverstone and the lives of our youngsters who walk to school via the A413, accidents will happen if the traffic volumes increase locally.</p>	<p>development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.  Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>
SPD043	P Bennett	<p>Some comments upon the above proposal, I've been a Silverstone resident since 2001.  Fundamentally the village has been failed for many decades, over multiple projects with a lack of joined up thinking around planning. Silverstone has grown from a tiny village with a race circuit within a mile or two that was used over spring and summer months at weekends for motor racing.  Today residential development has been to such an extent that a second village has been built and the evolution of the circuit has meant far greater utilisation meaning activities are no longer just weekend but throughout the week too, plus the season has been extended so the circuit business is almost 12 months of the year. I should know I'm a member of the BRDC [British Racing Drivers Club] who own it.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.  The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.  The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy</p>	<p>No changes necessary.</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Resource management in our village has been pitiful and that includes traffic management. The junior school is already at maximum capacity, certainly it was in the school year our daughter would have attended to the point that we now have to school our daughter privately.</p> <p>Traffic management sees international circuit traffic funnelled via the village, goodness knows why, and it all puts the burden and inconvenience further upon the village and enough is enough.</p> <p>For me the access to the A43 at Shacks Barn is another poorly thought out piece of planning and one wonders why anyone would entrust their future with the same idiocy of mind that created the current mess.</p> <p>I will commit significant sums to oppose the current development without the obvious necessary changes to road layout AHEAD of the development. That aside I also think that if you think 25 acres of warehousing comes without further demand on housing and village infrastructure then its more oversight and I just don't think this is appropriate especially since there is ongoing development at the race track site.</p>	<p>development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The Council has an Infrastructure Delivery Plan which identifies any future demand for infrastructure including education.</p>	
SPD04 4	Historic England	<p>Thank you for consulting Historic England on the Employment Allocations SPD.</p> <p>We have the following comments to make on this latest iteration of the document:-</p> <p><b>Section 1. Introduction</b></p> <p>It would be helpful to include reference to the required Heritage assessment within the Assessing Impacts section, page 8. Pages 10-13 are welcomed.</p> <p><b>Section 5. Overarching Design Principles</b></p> <p>Paragraph 5.3. Heritage assets and their settings should have an individual bullet point, similar to the fifth bullet point.</p> <p><b>6 Assessment and Evaluation</b></p>	Comments welcomed.	Changes made to the SPD in lines with comments made by Historic England.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Heritage assets should be considered as potential sensitive receptors.</p> <p>The Assessment and Evaluation section includes development frameworks illustrating spatial parameters. While these might be acceptable as a starting point for considering development based on constraints already identified, these will need to be flexible in order for the developments to take into account the findings of more detailed impact analyses (as per the Policy criteria). This should be clearer within section 6.</p> <p>In 6.84 (Site AL5 Assessment) reference is made to scheduled monument 'Motte and bailey castle, deserted village and monastic grange at Old Wolverton' (NHLE 1013660). Reference should also be made to the scheduled Roman villa site at Cosgrove ('Roman villa SE of Cosgrove Hall', NHLE 1003874).</p> <p><b>Appendices</b> Inclusion of the LDP Design Briefs is welcomed.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD045	S Richmond-Watson	<p>I set out below my comments on the two proposed Employment Sites in Towcester namely:</p> <ol style="list-style-type: none"> <li>1. Land at Bell Plantation</li> <li>2. Land at Woolgrowers Field.</li> </ol> <p>Towcester is an attractive small historic “market town” and in my view any development on Employment Land ought to reflect this. The town has retained its character and recent “in keeping” developments in the town centre have improved the town and added to its amenities.</p> <p>Developments on employment land, if they are well designed can also make a positive contribution. To do so they need to be relatively small in scale and built using appropriate materials.</p> <p>I support the policy that employment land in the Towcester area should ideally be developed to provide employment for people who live in the locality. This too implies the need for small scale buildings suitable for a large number of smaller businesses.</p> <p>Large warehouses would quickly take up the allocated land and provide minimal local employment. Surely largescale tall warehouse buildings should be confined to the numerous major warehouse parks around Northampton and adjacent to junctions 15,15a,16 and 17 of the M1 motorway.</p> <p>So that developments form a seamless part of the town and do not dominate/detract from the local landscape the height of buildings should be limited to maximum say 9 meters (and preferably 7.6 meters), which is plenty high enough for all normal users. Higher buildings will dominate the gently undulating landscape and spoil the views from the town and the surrounding countryside. The ravages of ash die-back disease is going to remove many of the hedgerow trees from the landscape in the next few years and mean that any new out of scale developments will have even more impact.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Both site and surrounding characteristics have informed the SPD including the market town of Towcester.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping.</p>	<p>Reference to the sightline from Easton Neston House to Greens Norton Church has been added.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>These sites are on major sightline from Easton Neston House (a building of international importance) to Greens Norton Church and high rise would adversely affect this. Careful landscaping of employment site is also an important consideration.</p> <p>In my experience most developers/landowners will go for the easiest option that will give them the quickest and highest returns. If they are allowed a "free hand" in Towcester this is likely to lead to a few large out of scale buildings providing minimal local employment. This can be avoided by the council seeking the development of well designed smaller scale buildings.</p>		
SPD04 6	Cllr L Fowler	<p>Thank you for the time you have spent drafting the Supplementary Planning Guidance for the Employment Allocation sites in the South Northamptonshire Local Plan Part 2. In response to the consultation I have some points and recommendations to make which will, I believe, mean that developments will be more closely aligned to the original intentions of the Local Plan. By ensuring that the height of local buildings does not exceed those already in place we will be better able to maintain the character of our local market town and rural environment, both of which our residents want to see</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium</p>	<p>The wording 'in part' has been removed from paragraph 3.2. The SPD will be</p>

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		<p>preserved. We also need to be mindful of the type of employment which is needed for local residents, and of the need to reduce commuting in and out, so that we are able to meet our sustainability pledges, which form part of the council's core principles. Whilst I recognise that logistics is a growth business, and the location of Northamptonshire makes it desirable for many companies to have a delivery hub here, we must adhere to the original intentions of the local plan (and in this guidance we must strengthen these intentions) to ensure that we create employment which is suitable for the population of WNC, and maintain a road network that will enable our residents to live, work and <b>thrive</b>.</p> <p><b>Background</b>  When the South Northamptonshire Local Plan Part 2 was adopted by SNC in July 2020, following years of work and consultation, the employment sites within it were targeted <b>for small to medium sized units</b> on the sites allocated. All these sites were given the prefix AL. In the foreword that Cll McCord wrote, he made this explicit by stating that the council would "aim to meet the demand for small and medium sized units by suitable land allocation." The small scale nature of what the Part 2 plan envisaged was repeated at page 57. The employment sites were part of strategy to reduce out commuting and keep skilled workers in the district. Policy EMP1 Supporting Skills makes this clear.  Page 121 – 122 of the Local Plan states  Page 121 – 122 of the Local Plan states  13.1.5 Strategic employment generation is focused through the WNJCS at Towcester and Brackley, Motorway junctions and at Silverstone. The district has 65 business parks and the new sites supported through the Part 2 Plan are intended to:</p> <ul style="list-style-type: none"> <li>• Meet local demand and strengthen the rural economy;</li> <li>• Provide the ability to strengthen local supply chains;</li> </ul>	<p>enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The purpose of the employment allocations in the Local Plan Part 2 was to reduce out-commuting and to help provide for local employment. There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy. In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications. By introducing the proposal for very large units only adjacent to the motorways would be the introduction of policy which can not be achieved through this SPD.</p>	<p>amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more</p>

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		<ul style="list-style-type: none"> <li>• Local flexibility and choice of locations;</li> <li>• Meet the demand for small and medium sized units and</li> <li>• Contribute to reducing the level of out commute</li> </ul> <p>Page 123 para 13.2.1 states that the Towcester allocation sites AL1, AL2 and AL3 are to facilitate some additional small scale employment opportunities to provide additional choice and opportunity for the growing population and to look to reduce out-commuting.</p> <p>At para 13.2.2 the Local Plan states All three sites offer suitable locations for a range of new small and medium sized business units including uses that are ancillary or complementary to existing or proposed B Class uses.</p> <p><b>The usual definition of small and medium sized enterprises (SMEs) is any business with fewer than 250 employees.</b> It is therefore clear that loopholes have been taken advantage of so that large corporations can develop these sites, going against the intentions of the local plan and thus failing to deliver on those intentions. The SPG must close these loopholes.</p> <p><b>Definition of Small, Medium and Large Units</b> Whilst I welcome the attempted of the SPD to define Small, Medium and Large Units I believe there needs to be another category, that of very large, and very large units should only be allowed on land adjacent to motorways which is not in the vicinity of residential areas. Small villages like Caldecote and Tiffield should not be under threat from mega units; the local plan was intended to protect them, not see a situation in which they were swallowed up by warehousing. The Local Plan was allocating land for small and medium sized business and they can meet their needs through small and medium units. I therefore recommend that the new guidance defines Very Large units as anything over 8000m squared and restricts their</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards. There is reference to the needs for drainage and ecological enhancements.</p>

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		<p>placement to land adjacent to motorways away from residential areas.</p> <p><b>Building Heights</b>  We have not yet had an answer as to why 16m was set as the height of buildings. I would like to see the height of buildings set at the height of current warehousing in the area, so that our natural environment is not threatened. Small and medium local business can bring employment to the area in buildings with a height of 12m. 16 metres seems designed to attract logistics businesses which are not going to attract the level of employment the area needs. I therefore recommend that no building should be taller than any existing building on or in close proximity to the site. For AL1 &amp; 2 this would be the existing Bell Plantation complex , Old Greens Norton Road area and Tove Valley Business Park area.</p> <p><b>Keeping Services On Site</b>  The SPD should make clear that all services and attenuation (for example rain water balancing ponds) must be kept on site and within the allocation area, and land set aside to ensure biodiversity should be kept on site <b>or be immediately adjacent to the development</b>. The council should not allow the sites to gradually creep in size by allowing some of these services to be adjacent to the AL site. This would stick the small and medium size of the allocation and help ensure that policy aims of the local plan are delivered. A principle of 'dealing with your own smoke' onsite must apply.</p> <p><b>Traffic Surveys</b>  The SPD does not give any guidance on the traffic issues that many of these AL sites could give rise to. I accept that any planning application must be accompanied with appropriate traffic survey and mitigation proposals, nonetheless some extra guidance on the acceptable levels of increased traffic the local road network can tolerate, would be welcomed. Many residents</p>		



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		<p>are concerned as to the traffic impact with some of the proposals that have been submitted. Whilst each planning application needs to be considered in isolation, we need to focus on the cumulative effect of traffic. Therefore I recommend the SPD should state what a full and comprehensive traffic survey for each of these allocations would be, and the level of traffic the Tove roundabout can tolerate without causing delays for local residents. The guidance should also lay out what mitigating factors should be put in place to relieve pressure on local residents when the M1 has issues.</p> <p><b>Employment</b></p> <p>The draft SPD at page 24 states para 3.2 that the role of the employment sites were in part to strengthen the local economy etc. The 'in part' addition is unwelcome. This gives a lot of wriggle room for other factors, no matter how spurious to be included 'in part'. The local plan is intended to provide land which small and medium sized businesses can use to expand in order to offer skilled and semi-skilled work to local residents, as well as to offer pathway employment.</p> <p>I recommend that the words "in part" should be removed from page 24 para 3.2 to provide a more accurate representation of the Local Plan Part 2 as adopted. The SPG should build on the intention of the Local Plan by making it clear that the sites are for local employment and thus placing quotas onto applications so that companies have to recruit within a five mile radius.</p> <p>We must ensure that the new guidance is robust and provides the planning department with clear guidelines and rules so that developers cannot ruin our rural communities.</p>		
SPD04 7	W Shankster	As residents of Silverstone , we would like to register our objections to this proposal for the following reasons	The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).	No changes necessary.

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		<p>1 in relation to employment opportunities warehousing does not have an intensive labour requirement are there any quotas they must meet?</p> <p>2 the visual impact of where the proposed buildings already at a high point of landscaping will be very heavy. Maximum height limit should be imposed.</p> <p>3 MOST IMPORTANT is LACK OF DIRECT ACCESS TO A43 this will mean that HGV travelling from the south will exit A43 just south of Silverstone travel all along the A143 a 30 mph zone with housing on both sides two mini roundabouts hardly suited to HGV two sets of Pedestrian crossings heavily used in particular at school times and of course past the new junior and infant school. The large Bovis housing development also accesses the A413 at two points only . Children walked to school will also face additional health issues associated with traffic</p> <p>Then HGV wishing to leave Shacks and travel South will again repeat their journey via the A413</p> <p>The noise level along this route will be considerable negotiating a very small recently constructed mini roundabout Dadford road to access A43 south</p> <p>If this proposal is to be granted there MUST be provision made for HGV to be prohibited from using A413 through village and they must travel to the Abthorpe road roundabout on the A43 Many residents will remember the difficulties accessing the then A43 prior to the bypass , traffic now is even heavier . The Bypass was built to relieve such issues To Allow HGV through our village is surely wrong</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The A43 provides good access to the M40 to the West and the M1 to the East allowing good direct transport links to the main conurbations in both the Midlands and London and the South East and as such will be attractive to incoming businesses looking to access those markets.</p>	
SPD048	R Kelso	<p>I am very concerned about the proposed development around the North of Towcester as set out in the public consultation at The Forum on 13th July 2022.</p> <p>The traffic increase during construction at AL1, AL 2 and AL 4 and when operational will cause grid-lock at the Towcester</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	<p>The SPD will be amended to confirm that the heights</p>

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		<p>roundabout. I understand that the traffic survey was undertaken during "lock-down" so will not have given a realistic representation of "normal flow". Every weekday evening the traffic there is solid in all directions. When the M1 is closed between Jcts 15-16 due to an accident, the diverted traffic make the problem even worse. It will become impossible for residents from surrounding villages to shop in Towcester in future under these plans and will go elsewhere. Businesses will close or move elsewhere.</p> <p>The Local Plan intended for SMALL/MEDIUM-SIZED UNITS, NO LARGER THAN 5000 SQ.M. This will not be the case with these units.</p> <p>The heights of the proposed buildings will be 12-16 metres, much higher than surrounding ones. Screwfix warehouse is 9.5 metres.</p> <p>I hope that the Council will re-think this proposal and consider the effect that it will have on a once attractive market town.</p>	<p>development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other</p>	<p>are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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			<p>material planning considerations. Any harm would need to be outweighed by benefits. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping.</p>	
SPD049	I Knight	<p>Here are my comments in response to the consultation exercise relating to the SPD which have been recently published. I should say to begin with that I was appalled that these development proposals were approved by the council planning committee a few months ago despite the huge amount of local opposition and the fact that these developments are clearly so unsuitable for the area. Similarly, it is a disgrace that multiple large scale developments, such as the Silverstone Circuit expansion near me and the enormous housing developments in Towcester and Silverstone have been approved previously despite the wishes of the people who live here. The SPD proudly asserts that South Northamptonshire is the 13th most desirable area to live in the country. That may be correct, but it was desirable because it wasn't built up, congested and polluted, which it clearly will be when all the above developments come to fruition. I certainly have no desire to stay in this area if things stay on their current trajectory. The SPD documents relate to 'employment sites'. As the document states, employment and standards of living in the area are already high, so additional large scale employment is not necessary for the local residents. The assumption must be therefore that the workers at these sites will commute from elsewhere, further increasing traffic levels. Objective 9 states that the development will seek to "...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is</p>	<p>Planning applications will continue to be determined against the development plan and any other material planning considerations. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. Matters of ecology, green space, tranquillity, lighting will all be taken account of as part of the determination of planning applications. Any impacts will be balanced against any benefits of the schemes. The Design Principles will continue to encourage people to use alternative modes of transport including through the provision of footpath and cycle links.</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/</p>

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		<p>respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes". No matter how much money the council or developers spend on greenwashing the proposals, these developments will adversely impact biodiversity and environmental character of the locality. How can spoiling green spaces like these and turning them into urban landscapes possibly conserve wildlife? Perhaps the council would like to employ an environmental consultancy to reappraise the developments? As for tranquility, how can numerous HGVs and increased commuter traffic possibly conserve the natural environment - it is a physical impossibility! I also note that at least one of the developments will be lit all night. This area has already suffered an appalling increase in night-time light pollution over the 20 years I have lived here (for example, whoever gave Silverstone Circuit permission to light up the night sky with its festive 'Lap of Lights' ? What a pointless and energy-wasting event that is!), and this will make things even worse.</p> <p>The Design Principles state that you will "Use footpath, cycle, and road networks to support and encourage sustainable travel to and around the site.". Here's a good example of how well the council and developers currently do this: the Wood Burcote road has recently been permanently closed to vehicular traffic between Silverstone and Towcester. So, Silverstone drivers now have to sit in the rush hour queues on the A43 until the housing development is completed. An alternative route through to Towcester could have been established immediately before house building gets underway and the road closure. Worse still, no thought whatsoever has been given to cycling provision along what was a nice rural lane joining the two towns, and the expectation is that cyclists should ride along the</p>	<p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>steer applicants towards more ambitious design standards. Provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing</p>

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		<p>A43 or A5. Similarly, there is no pedestrian crossing to the Jardines garage and on to Greens Norton from Towcester across the A43. Also, there is no safe pedestrian crossing across the A43 from Towcester to Tiffield.</p> <p><b>If, as I suspect, these developments get approval, despite the overwhelming opposition of residents, the council should insist on dedicated high quality cycling tracks, with traffic controls, to both the sites and between Tiffield/Greens Norton/Silverstone and Towcester - paid for by the developers. We, and the planet, need people to use their cars less, and these routes would be ideal for bicycle and e-bike use in the coming years. Look what the Dutch have done and learn!!!</b></p> <p>On traffic flows, I see that the 100 page SPD contains the word 'traffic' just once! I would urge the council to insist the planners do an assessment of rush hour flows around Towcester on the A43 and A5 to take into account the worst case scenario of all developments going ahead, and factoring in both the HGV traffic and commuting traffic to the new sites, as well as all the additional traffic from recent and planned future residential development in the area. Typically there is at least one problem a week on the M1 which results in additional traffic on the A43/A5, and these events too should be modelled. I would urge the council to insist on the developers paying for an A43 upgrade so that there is a proper flyover for the A5/A43 junction and relief road junction. The A43 is perpetually in a state of being patched up with numerous overnight closures, so I do wonder how the council thinks it can cope with all of the future additional traffic. The proposed logistics depots would be much better located near the M1 rather than at Towcester.</p> <p>Thank you for providing us with the opportunity to comment on the proposals. Now I hope the council will do the right thing.</p>		<p>local services to help promote sustainable travel as well as the enhancement of walking and cycling links</p>

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SPD050	M Humphreys	I have lived in Towcester since 1988. Due to the over development of our town with virtually no supporting infrastructure, accompanied by the near gridlock of traffic most days I am now looking to move away. Your plans are nothing but greedy desecration of the locality with no regard for the residents and their quality of life. You decision makers don't have to live here and suffer the long term consequences.	The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.	No changes necessary.
SPD051	L & D Ward	I wanted to write on behalf of my husband and I who, with our 2 children, live in Silverstone. With one child schooled in Towcester at secondary and one in Silverstone, and the requirement to shop etc, we spend time between both Towcester and Silverstone so both places matter a great deal to us. Our very immediate concern is for the new Shacks Barn development. We are extremely concerned about the operating hours of this site, operating 24/7 and this will cause noise and air and light pollution. We know that this is an already elevated location in the village meaning these buildings will tower over the area. The size of the proposed buildings both footprint and height are now proposed as 30% larger than the allocated area in the local plan. These large warehouses are not demonstrably subservient or complementary in scale to the existing industry at Shacks Barn as required by the Local Plan. We are mostly concerned about the traffic. There is no direct access planned for the site to be able to access the A43 and so this must mean the traffic will have to pass through Silverstone to go southbound on the A43. The bypass was created to remove trucks of this size from the village so it makes no sense. There is now a primary school located on this route with	The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed	The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.



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		<p>the another school that also has to use this section of road too. Children and parents have also been encouraged to not drive to school as it lacks parking so there is always lots of children travelling along the road sides too.</p> <p>Going the opposite way and heading for the M1 also causes me concern. The stretch on the A43 through Towcester is already horrendous so I am blown away that planning is considering expanding this area and the two developments of Woolgrowers field and Bell Plantation which will have huge volumes of HGV and vans travelling in and out using these roads. This will mean driving the local roads will be much more dangerous.</p> <p>The buildings proposed at The Bell Plantation are over sized and surely not in line with the local plan?</p> <p>Please take this as an official objection to the three developments.</p>	<p>development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. Due consideration will be given to the A43 and the local road network.</p> <p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications. Any objections to the planning applications will need to be separately.</p>	
SPD05 2	B Cox	<p>Please find my comments on the Supplementary Planning Document for employment land in the Silverstone/Towcester areas.</p> <p>I am not against development of land in the Silverstone/Towcester areas per se as it is important to provide opportunities for jobs and developments in the area however there needs to be a balance between development and</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation</p>	The SPD will be amended to confirm that the heights are indicative

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		<p>preserving both the environment and the ambience of the local community.</p> <p><b>TRAFFIC</b> The SPD should require that a cumulative traffic assessment be carried out for ALL sites (Shacks Barn, Bell Plantation and Woolgrowers Field). The Towcester roundabouts can become very congested and development will have a substantial effect on traffic flow around them. Additionally for Shacks Barn there is currently no direct access to the A43 and therefore substantial HGV traffic can be expected through the A413 in Silverstone village which would have a very detrimental effect on village life.</p> <p><b>BUILDING FOOTPRINTS</b> The original Local Plan allowed for small and medium size units only. The size envisaged by the Draft SPD is much greater in all locations. The maximum size of building footprint should be limited to that currently in place at the Silverstone racing circuit, which I believe is 5000m<sup>2</sup>. This size, I believe, allows for development while being less detrimental to the surrounding environment.</p> <p><b>HEIGHTS</b> Any development should be limited to 10m in height, again in line with limitations on building development at the Silverstone circuit. The adverse effects of the taller buildings envisaged in the Draft Local Plan would not be mitigated by planting and would be visible for miles around.</p>	<p>implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to</p>	<p>and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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			<p>be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p>	
SPD053	SUE	<p>I am writing to you to express my concerns with the proposed Warehouse development in Cosgrove. Please see my comments below.</p> <p>The proposed development will have an impact on the traffic on the A508. This road is already very busy and there is often gridlock situations when there is an accident on the M1 . There has been fatalities in the past due to the road turnings from Cosgrove and Castlethorpe. The warehousing development could cause further accidents.</p> <p>The summer months, the Caravan park in cosgrove has a lot of extra traffic coming in and out of Cosgrove on the A508. Increased traffic will cause congestion both on the A508 and the village itself.</p> <p>The position where the development has been proposed is too close to the main road and the village itself and will have a</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	No changes necessary.

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		negative impact on green spaces and natural habitats that are crucial for the environment and the local area .	National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Any development proposals for Old Cosgrove would need to consider the restoration of the canal to form an integral feature of the country park providing an opportunity to enhance both its ecological and recreational value.	
SPD054	J M Dolman	<p>Section 3 Contextual Considerations This section is very weak regarding AL4, a section is provided on the Rural Setting North of the A43 but not on the South of the A43. This is required as AL4 is located on a hill top and will impact the surrounding settlements particularly Whittlebury and Silverstone. How does AL4 fit in with Objective 9 - "...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes?</p> <p>Section 4 Landscape and Visual Consideration AL4 Visual Summary - No mention of the impact of light pollution due to the site's hill top position. An example of the impact of this already exists in West Northants at Rothersthorpe where light pollution from Swan Valley has</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Site specific and contextual information was used to inform the SPD including topography and heights. The assessment undertaken as part of this SPD is not intended to be exhaustive, as such further contextual and site assessment and design work will need to be undertaken at planning application stage.</p> <p>As part of the planning application process, any adverse impacts on</p>	A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery

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		<p>resulted in a village which is rural during the day and urban at night, as it never gets dark.</p> <p>Section 5 Overreaching Design Principles Para 5.3</p> <p>"Seek opportunities to address the existing road network in a positive manner, be that through new active building frontage and decorative planting or the retention and enhancement of existing native planted boundaries/edges"</p> <p>This is a very interesting statement in that a road primarily exists to allow people and goods to move from A to B, so the principle way to address the existing road network is to ensure it remains fit for purpose, by ensuring that planning applications do not result in the said road becoming overloaded.</p> <p>"Limit the impacts on tranquillity of each site's rural setting, this includes minimising/mitigating any light, noise &amp; air pollution or visual clutter (i.e. advertising) resulting from the future operation of new buildings."</p> <p>This is the only reference to light pollution in the whole document. As all the sites discussed in the document are rural why has light pollution not been covered for each site? This is also the only reference to air pollution in the entire document.</p> <p>Section 6 Site Assessment Para 6.56 Access and Movement - No mention that the A413 A43 junction has no slip roads in the Brackley direction which will result in all traffic to or from the south (M40) using the A413 through Silverstone village. The recent developments agreed since the bypass was built have resulted in the school moving beside the A413 and three housing developments which require children to cross the A413 to get to school. You also state that you want people to be able to travel to work on foot but currently there are no footways to AL4.</p> <p>Figure 70 - no ridge shown should be added.</p>	<p>communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include any impacts on the environment or local communities such as light pollution.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Local Plan Policy Part 2 requires the provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as</p>	<p>throughout the document that will seek to encourage/steer applicants towards more ambitious. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. design standards.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Para 6.60 Access and Movement - This existing access point from the A413 is very steep and the teardrop is very tight, are you sure this is suitable for a development of this size being used by large lorries? No mention that the A413 A43 junction has no slip roads in the Brackley direction which will results in all traffic to or from the south(M40) using the A413 though Silverstone village The recent developments agreed since the bypass was built have resulted in the school moving beside the A413 and three housing developments which require children to cross the A413 to get to school. You also state that you want people to be able to travel to work on foot but currently there are no footways to AL4.</p> <p>Para 6.61 Drainage - I assume this site will be served by the Silverstone Treatment Plant which is already severely overloaded as a result of the recent housing developments in area. While I understand this is the province of Anglian Water it does have a direct impact on your electorate and a statement should be added to reiterate Anglian Water's responsibilities.</p> <p>Para 6.65 Height, Scale and Massing - Due to the hill top position and the impact of light pollution a maximum high of 15m is inappropriate for AL4. The site should not be zoned for larger units due to the limited access from the A43 unless the developer pays for the addition of the additional slip roads.</p> <p>Para 6.66 It should be made clear that large units will not be considered.</p> <p>Appendix A - Design Briefs AL1 Bullet 5 &amp; AL2 Bullet 4- No mention is made of the impact of additional traffic from the development on the A5 and A43. The junction of these two roads is already severely congested and the opening of the Towcester Relief Road will increase the traffic flow on the A43 between the Relief Road Junction and the A5. While I understand that both these roads are designated as trunk roads and are therefore not the</p>	<p>the enhancement of pedestrian cycling. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>Certain wording in the SPD has been strengthened to ensure that issues such as noise and light are considered as part of the planning application process. Provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>responsibility of West Northants Council, this development will have a serious adverse effect on your electorate if you are careless with the planning.</p> <p>AL4 Bullet 2 &amp; 3 - Use B8 should be removed as this site does not have access from the A43 Brackley without having to drive through Silverstone Village. The recent developments agreed since the bypass was built have resulted in the school moving beside the A413 and three housing developments which require children to cross the A413 to get to school. As an alternative a prerequisite to use B8 should be the missing slip roads at the junction to be 'added at the cost of the developer'. Can you please provide a response to each of my comments and keep me informed.</p>		<p>contribution to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of walking and cycling links.</p>
SPD055	T & S Dibble	<p>We are writing to you with our concerns regarding the proposed development at Shacks Barn in Silverstone.</p> <p>The original plan was for small and medium size units only but the new plan is radically different and massively larger in scale. It, in our opinion, will be extremely intrusive and very out of character with the rest of its surroundings. We understand that it will be very visible from the village which will impact the whole ambience and countryside feel of Silverstone.</p> <p>The other very very concerning issue is the immense amount of heavy traffic that will be bound to use our village as a rat run.</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the</p>	<p>Provision of new footpaths and cycleways that link to existing networks; and good accessibility</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>There is no way on this earth that the lorry drivers will take a longer route if there is a quicker one available to them. The A413 passes through part of our village and also past the village primary school. Surely the idea of vast numbers of huge lorries thundering past the school and houses at all times of the day and night creating jams and noise and a enormous amount of pollution is something that should be avoided at all costs. This new application should be rejected completely as it is obviously not suitable at all for its surroundings and the road network.</p>	<p>development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. Any harm would need to be outweighed by benefits. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of walking and cycling links.</p>
SPD056	D Dalziel	<p>I wish to comment on the planned development at Shacks Barn. I am a resident of Silverstone living directly on Towcester Road so will be negatively impacted by this development. Firstly, the traffic volumes of heavy good vehicles this will generate. The A43 was built as a by pass to remove reduce the</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on</p>	<p>The SPD will be amended to confirm that the heights</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>volume of traffic driving along the A413 through Silverstone Village.</p> <p>The Shacks Barn proposal sees additional volumes of HGVs using the A413 for access. It must be said that the suggested volumes of additional vehicles submitted by Clowse the developer are farcical. They really have made the maths fit the answer they wanted to achieve.</p> <p>If these numbers are farcical the previous comments submitted by Cllr Bambridge that vehicles exiting the site should "travel Northbound up the A43 and turn around at the roundabout" are genuinely comedy gold.</p> <p>The Shacks Barn site does not have full access to the A43 so by default much additional traffic will travel through Silverstone Village.</p> <p>Any Supplementary Planning Documents should therefore require that a full traffic assessment be carried out that models the impact not only of Shacks Barn in isolation but also the proposed warehousing developments at Bell Plantation and Tiffield.</p> <p>Secondly, the original local plan allowed for small and medium sized units only. This latest SPD now seeks to change this and introduce large format units of over 8000m2. The recent expansion of the site around Silverstone Circuit tops out at 5000m2 so any move to increase the allowable size is without precedent locally and not in keeping with the surrounding environment.</p> <p>Thirdly, on the subject of the local environment this latest iteration of the plan would allow a building height of up to 15m. The highest building locally is 9.5m. I urge you to take a walk up to the top of Winterhills and see for yourselves what a blatant eyesore this would create. No amount of tree planting could possibly hide or diminish the impact of such a tall building in an area of open landscape.</p>	<p>highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p>	<p>are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		That these developers have been able to get this far in the planning process is a damning indictment of the failings of the now defunct SNCC and its leadership . It is not too late to reign them in.		
SPD057	L Drinkwater (online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: I do not see why areas of green field development are being looked at in South Northamptonshire. We are in close proximity to Milton Keynes which has a lot of vacant warehousing, and large areas of development already under way providing plenty of scope for the developments proposed without the need to swamp small villages with industrial units.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: The proposed building of distribution and office buildings along with lorry parking would be totally inappropriate in this area. This area is a haven for wildlife and has been enjoyed by the local community for many years. The current transport infrastructure is wholly unable to support further development and traffic of this nature. The A5 roundabout becomes congested very easily and the increase in volume of vehicles could cause gridlock. The noise impact on the houses adjacent to the development would be considerable and the quality of life for the residents would be severely impacted.</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). AL1, AL2, AL4 and AL5 are all allocated in the Local Plan Part 2 which has been through a formal Examination in Public process. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. Any</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: This is a rural area. The small village of Cosgrove would be sandwiched between the Cosgrove Caravan Park and this development, should it go ahead. This would mean we would be overwhelmed by development and the character of a conservation area would be destroyed. The countryside walks so long enjoyed by the local community in that area would no longer be possible and the local wildlife such as badgers, deer and many small mammals such as stoats and weasels would be driven out.</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: The safety of local residents leaving the village would also be impacted if there are large numbers of lorry and other vehicle movements associated with this development. Highways have told us many times that they cannot afford additional safety roundabouts and this will further add to the dangers.</p>	<p>ecological impact will also be considered and informed by ecological appraisals and reports as would any heritage impact arising from the development on the conservation area.</p>	
SPD058	C Aires (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:</p> <p>1. Traffic The impact of the development on the local road network makes this development unsustainable. The Traffic Assessments for this site are inadequate and completely fail to provide for the high volume of traffic, including HGVs, that will be generated. When main routes are congested, traffic will use local roads unsuitable for high volumes and large vehicles.</p> <p>2. Poor employment opportunities Large volume warehouses will not provide the local employment levels that Small Medium Enterprise businesses would provide and which was expected in the designation within the Local Plan.</p> <p>3. Infrastructure The site does not demonstrate a comprehensive planning approach in terms of strategic planning for infrastructure. There are inadequate plans for cycle/pedestrian/public transport access. Proposals for large scale high volume warehouses are neither demonstrably subservient nor complementary in scale to the existing industry in Towcester as required by the Local Plan.</p> <p>4. Ill considered benefit to local community Football pitches benefit a minority of the population and do nothing to mitigate the detrimental effects of this development to the area as a whole. Building football pitches next to an area producing high emissions from distribution vehicles is not compatible with the delivery of those pitches within the parameters of a sustainable environment.</p> <p>5. Size and footprint The Visual Impact Assessments for this site are biased in favour of the development and are not objective. The building of these huge warehouses will be a eyesore for miles around.</p>	<p>development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p>	<p>and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Summary: This development does not adhere to the design and place shaping principles required both under SS2 and by the National Planning Protocol Format.</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer: 1. Traffic and infrastructure There are benefits in improving the local emergency services provision. However the cumulative impact of developments AL1, AL2 and AL3 at this location will cause traffic congestion and possible gridlock due to the absence of adequate infrastructure planning.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: 1. Size and footprint There must be a stated limit on the height and volume of any buildings to go on this site to ensure that it does not adversely impact Towcester and the surrounding area.</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications.</p>	<p>further impact assessment in line with the general principles set out in the SPD.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:</p> <p>1. Traffic The lack of direct access to the A43 in both directions will result in all site traffic including HGVs either driving directly through the middle of the rural village of Silverstone, past the newly built school and the special needs school, or will use Whittlebury and Cowpastures Lane as rat runs. This will make accessing the schools and driving on local roads even more dangerous.</p> <p>2. Size and footprint The proposed development is nearly 30% larger than the allocated area in the Local Plan. The proposed development will operate 24/7 and will cause noise, air and light pollution in an otherwise rural location. The location of Shacks Barn is on the Whittlewood Ridge, the highest point in the area. This means these large warehouses will be visible for miles around, adversely impacting the rural environment. Large warehouses are not demonstrably subservient or complementary in scale to the existing industry at Shacks Barn as required by the Local Plan.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer:</p> <p>1. Poor employment opportunities Large volume warehouses will not provide the local employment levels that Small Medium Enterprise businesses would provide and which was expected in the designation within the Local Plan.</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: On a final point, the proposal at Shacks Barn (AL4) will hugely affect the quality of life and seriously endanger our children in the village. If the history and character of the village is not important, then the safety of our children must be conserved. These plans can not be approved!</p>		
SPD059	Incomplete online response			
SPD060	Mr & Mrs Daniels (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: The design principles do not take into account the local existing businesses and their expansion needs, or local community or culture which are fundamental to all development. Alternative employment options have been excluded from all the design principles and means these plans are too restrictive with business diversity and shows that turning green belt land to employment land prior to proper planning approval is not</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning</p>	<p>Reference has been added to the requirement to mitigate against the impacts of climate change. This will be</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>appropriate or democratic even if you can do a tick box exercise to make it fit your newly created design principles. The consultation on the strategic plan ought to have been done prior to the conversion of green belt to employment land and formed the design principles rather than the design principles driving future development based on aesthetic looks and short term business requirements that will probably be obsolete in a few years time like the buildings in many brownfield sites. These principles have too narrow focus on warehousing/business units and how it could look 'virtually' (no plan looks the same in reality). This is why we had a robust planning system to use brown belt land as first priority for employment needs and no mention has been made in the design principles.</p> <p>Excessive heat in summer, increased rainfall and storms will be 'normal' and this is not fully covered in the design principles or the impact of pollution on existing sensitive eco systems. No mention of ongoing running of these units in a sustainable way is in the design principles with regards to solar or alternative heating to gas.</p> <p>There is too little in these design principles to confirm how this meets with the CoP26 agreements with reducing climate change impacts for new projects.</p> <p>All new warehousing means increased amounts of traffic, energy and building materials, planting a few trees in one of the fields will not reduce the carbon footprint of these developments.</p> <p>The principles have clever wording to avoid preserving our sensitive eco systems as they will all be put into the 'where possible' or 'limited impact' categories in your document. This gives reasons for not preserving land that is currently very much enhancing the nature reserves it is sandwiched between and wasting lots of lottery and charity funding already used to</p>	<p>consideration in the determination of future planning applications. As with all local plan documents, there is a statutory process to go through. The Local Plan Part 2 was consulted upon several times prior to going through an Examination in Public process.</p> <p>The topography of the sites have been considered in producing this SPD. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals</p>	<p>alongside the requirements under Building Regulation to meet the current standards. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added following</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>enhance nature along routes which will be 'significantly impacted' or more likely lost in the proposal and would not meet light, noise and air pollution design principle unless the design principle was very, very vague like yours.</p> <p>There is nothing in your design principles about who enforces holding businesses to account when the design principles are not met as they are not legally binding.</p> <p>Covering over historic sites of interest that could enhance local economy and culture is not part of design principles for these warehouses/units.</p> <p>Land should not be considered for business use with the sole purpose of warehousing/business units as implied in these design principles. This restricts diversity and opportunities of enhancing the landscape with something like a marina and is not covered in the design principles of this document.</p> <p>The design principles do not cover impact on existing businesses which have sustained many local jobs for many years and no impact assessment for local business is included in these design principles.</p> <p>The design principles do not take into account the local topography as proposed warehouses/units would be situated on the top of hills or too big to be hidden which not only aesthetically would mean the warehouses could not be disguised behind any proposed planting which has been confirmed and witnessed from existing new developments no matter what colour the building is so the design principles relating to colours, sizes and aesthetics are of very limited value in your document.</p> <p>No mention in the design principles has been made with regards to brown field sites which were considered as first priority for redevelopment prior to converting green belt land for warehousing as the design principles are too narrow.</p>	<p>would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>The AL5 site at Old Stratford required the detailed consideration of the existing canal route through the site and the country park.</p> <p>There is also a requirement to protect the existing Anglian water drainage and water infrastructure including the Dogsmouth Brook.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications. Additional wording has been added following comments from the Environment Agency.</p>	<p>comments from the Environment Agency. Additional wording will be added to ensure that matters such as light and noise pollution will be considered at the planning application stage.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>There are other types of employment than working in a warehouse/business unit and it seems that consideration in the design principles has not given thought as to alternative places of work other than warehousing and business units and is fundamental to any meaningful consultation and design principles.</p> <p>Few jobs are required in large warehouses and business units as much of it is mechanised and done by robots, there is nothing in the design principles to state numbers and types of jobs these facilities would create. My opinion is that most jobs created would be driving jobs for freight movement and therefore warehousing must be closer to the freight terminal by the M1 to reduce freight by road and increase it by rail especially with increased fuel costs but too difficult to assess from the current design principles.</p> <p>Design principles do not mention freight movement being more environmentally beneficial and now more cost effective with increases in fuel prices so all of the warehouses for sorting and redistributing goods or manufacturing are in the wrong location. Alternative employment options have been excluded from all the design principles and means these plans are too restrictive with business diversity and shows that turning green belt land to employment land prior to planning approval is not appropriate or democratic.</p> <p>The SPD principles does not set out the long term principles of such developments so that sites do not become the brown field waste land and empty units like we currently have in many locations in 10 years time.</p> <p>I totally disagree with the design of this supplementary planning consultation document as it is designed for people to agree with questions in areas not local to them and numbers of people agreeing to design principles outside their own local area</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>MUST NOT be taken as overall agreement to these design principles of that area.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Alternative employment options have been excluded from all the design principles and means these plans are too restrictive with business diversity to only relate to business units.</p> <p>The scope of the size for each category is too wide and means that many units will over power the setting with which it sits.</p> <p>The size scope is designed to mislead and misguide people to agreeing to proposals that are not fit for current locations and MUST be amended in all consultation documents.</p> <p>AL5 could be a prime site for a new marina on the Buckingham Arm of the canal and a golf course enhancing local businesses in the area rather than destroying them with warehousing/units in what is a nature filled, leisure and tourist area, therefore, design principles of small, medium and large units of this proposal is too restrictive to cover all the locations.</p> <p>The design principles and unit sizes do not take into account the local existing businesses and their expansion and development needs.</p> <p>The methodology of unit size does not allow for the size of plot or large number of proposed units on each so is also very misleading in this document and ability to comment within the restricted questions on it.</p> <p>Methodology used in the whole of this process to date very much appears to be based on what will make the biggest short term profit by manipulation of planning laws and I am angry that I am part of a society that has lost its democratic rights and</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>planning laws and being forced to answer questions such as this.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: Alternative employment options have been excluded from all the design principles and means these plans are too restrictive with business diversity for this leisure, nature filled, historic area between nature reserves.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Proper local opportunities such as a new marina off the Buckingham Arm of the canal and golf course would be business much more suited to this location which would enhance this land that is currently already very much enhancing the nature reserves it is sandwiched between. A lot of charity money, grants and lottery funding has been spent enhancing nature along this route on the Buckingham arm of the canal which will be wasted due to significant impact or even lost with details explained in the plan of this current proposal. This makes me angry that charity money is being wasted due to such proposals as this being able to arise in the first place.</p> <p>The paper based pledges in the design principles will not be met under the 'constraints'.</p> <p>In reality the pristine Dogsmouth brook will become polluted without anyone being able to be held accountable due to 'where possible and limited impact' clauses, much loved footpaths lost, fear of being out alone on footpaths near an industrial area restricting how people live, hedgerows ripped out and habitat for wild flowers, bats, mammals and many insects destroyed and yet to be explored history covered over which should very much be the 'opportunity' of this land. Too much will be lost or 'largely overlooked' according to the constraints and opportunities warehousing proposal because this consultation exercise is like shutting the door after the horse has bolted and are trying to make a square peg fit. It doesn't.</p> <p>Orienteering skills would be lost by service users of the Scout camp opposite this development due to the size and scale of the proposed buildings, even the small units due to the extremely large scope of scale.</p> <p>Size of small business units is too wide a scope for this area.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>All freight must be by rail where ever possible due to climate change and warehouses situated appropriately for minimal road transportation.</p> <p>Only a very small part of this site might be appropriate for business units near the existing units and kept to the smallest small scale in keeping with existing buildings.</p> <p>There are no constraints mentioned on hours of work, light, noise or air pollution.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>This proposal is too restrictive and is not considering all opportunities. An impact analysis must be considered for a whole development framework for Cosgrove/Old Stratford to ensure existing businesses can expand and be enhanced by new development, not restricted or reduced as these are long term well established existing businesses. Once this has been done new development proposals could be drawn up which will be much more appropriate for the site.</p> <p>A lot of charity money, grants and lottery funding has been spent enhancing nature along this route on the Buckingham arm of the canal which needs to be preserved along the whole length and linked up with existing nature reserves which it enhances. This money must not be wasted.</p> <p>Local footpaths must be preserved and not woven through industrial estate.</p> <p>The scale of this development site just for business units is too big for this leisure and nature filled rural conservation area.</p> <p>The framework must include CoP26 environmental building efficiencies and running restrictions.</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>14 Are there any other comments you wish to make which you have not already made?            Are there any other comments you wish to make which you haven't already made?:            Why are the details on job types and numbers not included in the plan?            How much additional planting of trees and shrubs will be done to mitigate flood damage to existing properties in flood zones?            Will mitigation planting include fruit trees and herbs to help provide food when shortages from climate change and increased prices?            Will the new buildings be self sustaining from generating energy within existing limits which means zero rather than net zero for new developments.            It is difficult to contribute to the specific details of each area without knowing each plot of land so this form design is very restrictive.</p>		
SPD06 1	Incomplete online response			
SPD06 2	S Dickson (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?            No            5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?            No            6 Do you agree with the constraints and opportunities identified in respect of Site AL1?            No            7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p>	Comments notes.	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No 8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p> <p>No 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p> <p>No 10 Do you agree with the constraints and opportunities identified in respect of Site AL4?</p> <p>No 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>No 12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p> <p>No 13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p>		
SPD063	W Hine (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning</p>	<p>Strengthen the reference to consideration of carbon off-setting where necessary.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: To put it plainly, I do not think there should be any more destruction of countryside, especially those that are not at least carbon negative, never mind the increased congestion and air pollution. I certainly wont be supporting something that puts</p>	<p>consideration in the determination of future planning applications. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. This will include HGV traffic.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>more HGVs in and around the area. Maybe if you propose to give back an equal amount of land to nature somewhere within the vicinity, and make a proposal that is carbon negative then I might consider a proposal.</p>		
SPD06 4	C Bird (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: The SPD does not appear to consider the detrimental effects on the environment and residential settlements within the area AL5.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer: The size of any development must be controlled to prevent developers proposing unacceptably large units</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer: Little relevance to Cosgrove</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Little relevance to Cosgrove</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p>	<p>This SPD has been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including the environment and residential settlements.</p> <p>As part of the planning application process, any adverse impacts on communities including Cosgrove and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	<p>The SPD will ensure that there is appropriate reference to Cosgrove.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Little relevance to Cosgrove</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Little relevance to Cosgrove</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer: Little relevance to Cosgrove</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Little relevance to Cosgrove</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: AL5 was approved without any consultation of residents within the area</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the sit should be considered? No Please provide comments to support your answer:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The proposed development takes little account of the residents of Cosgrove, which is already adversely affected by unacceptable traffic levels from Cosgrove Park, and the interchange of the A5 and A508. When the M1 is disrupted, this route is heavily congested, and with the ongoing developments along the A5 corridor, will only get worse. Major changes to the highways infrastructure are needed before any such development can be considered. The environmental and visual impact will be immense, in what is open countryside with a river valley and floodplain. I believe a development of this size and nature is inappropriate for this site.</p>		
SPD065	S Loines (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: Any buildings should be no larger than 5000m2 and no taller than 10m</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: No large units. Ideally none at all but especially no large units. We have such limited countryside now which not only makes living here less appealing but continues to have major environmental impact</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: There are several empty warehouses across Milton Keynes that should be renovated and accommodated before ANY future developments in the surrounding area should be considered. It still provides plenty of job opportunities to do this</p>	<p>out commuting as well as to help provide for local employment. There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>and uses land already occupied by warehouses rather than causing major disruption and negative environmental impacts to our already limited countryside.</p> <p>I would insist that there be a full report of all empty and unused buildings across the Milton Keynes area to justify why new ones should be built.</p> <p>In addition to this commuting to work is already difficult through towcester, cowpastures lane and down to the a5 roundabout (stony Stratford) these plans will have a significant impact on this again affecting environmentally as well as mentally for everyone that has to travel this direction.</p> <p>These plans should not go ahead. If they absolutely must then it should be for limited small buildings only.</p>		
SPD066	A Bush (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: The development in Cosgrove is meant to be an employment zone. It is currently planned for warehousing which has extremely limited employment opportunity. Many warehouses operate in darkness and are fully automated. Warehousing is amply provided for on the M1 corridor and around Milton keynes where transport links are acceptable</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer: A mix of units will allow for a mix of employment opportunities</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes Please provide comments to support your answer:</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	No changes necessary.



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>In principal the road network around this area will cope with the additional traffic generated</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: This development should be limited to the Furtho Pit field and that should be limited to local industry, not to warehousing which is catered for elsewhere such as the M1 corridor and swan valley etc. Employment opportunities are very limited with warehousing - many operate in the dark!</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p>	<p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications. The future development at Furtho Pit must also deliver benefits in terms of the Canal Route and country park. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage including impacts on Castlethorpe and Haversham. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  This site should not be developed. The A508 and particularly the Old Stratford roundabout are already over capacity. (as identified by Highways England in the David Tucker document (date redacted) ) This overcapacity was understood back in 2008 when planning for a garden centre on this area was refused. The development will lead to massive traffic disruption in the area. The fields that you want to develop along the Stratford Road are residential areas and this development will be 24/7 causing disruption to their lives with lorry movements through the night together with light pollution</p> <p>14 Are there any other comments you wish to make which you have not already made?  Are there any other comments you wish to make which you haven't already made?:  This is the wrong development in the wrong location. It will have a massive negative impact on a rural area. Residents already try to avoid driving down to the Old Stratford roundabout by driving through Castlethorpe and Haversham. This traffic will become a great deal worse.</p>		
SPD067	K Padley-Knight (Online response)	<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?  Not Answered  Please provide comments to support your answer:  No mention of the BPA pipeline that runs through the site, and consequent easement restrictions in place.</p>	As part of any preparation for the planning application, the applicants will undertake utility searches to identify any constraints which exist.	The BPA pipeline on AL5 to be added.
SPD068	M Humphreys (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?  No  Please provide comments to support your answer:  The overarching design here is one of over-development dressed up as a benefit to the locality. [Text redacted]</p>	The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Building heights have been informed by a combination of desk-based	The SPD will be amended to confirm that the heights are

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Please provide comments to support your answer: Some of these "medium" units are several meters higher than any existing structures and are impossible to disguise.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p> <p>Please provide comments to support your answer: How much more traffic do you want to inject onto an already dysfunctional and accident ridden Tove roundabout? You are now adding the extra nuance of greatly increased pedestrian traffic crossing the A43 to visit sports pitches.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Complete over-development of the site in every respect from traffic to visual harmony</p>	<p>assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	<p>indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>Please provide comments to support your answer: Lets throw another lane of traffic onto the Tove roundabout which barely copes now.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Complete over development which Towcester does not need or want</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>Please provide comments to support your answer: The whole design is disgustingly out of context for the locale.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Over developed</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered</p> <p>Please provide comments to support your answer: No comment.I live in Towcester</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: Are there any other comments you wish to make which you haven't already made?: I have lived in the area since 1988.Due to the over development of our town with virtually no supporting infrastructure,accompanied by the near gridlock of traffic most days I am now looking to move away. Your plans are nothing but greedy desecration of the locality with no regard for the residents and their quality of life.You decision makers don't have to live here and suffer the long term consequences.</p>		
SPD069	F Sundrykov (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: A proper traffic assessment should be carried out for all proposed sites to see the combined implication of the extra traffic brought to the area.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p> <p>Please provide comments to support your answer: No consideration has been given to the actual implication of the additional traffic brought to the area. The road system is already under substantial pressure, particularly the single carriageway portion of the A5 between Milton Keynes and the Towcester roundabout. Also not evident consideration has been given to the disruption caused to the residents during the construction of the site. Furthermore, what studies have been undertaken to demonstrate that the job opportunities to be provided match the need of the local residents?</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: The site development should be in keeping with the rural nature of the town and should not attempt modernize the area.</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>Please provide comments to support your answer:</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Physical and mental health well-being can be a material consideration which can be taking into account as part of the determination of a planning application. The Council's Environmental Protection and Public Health teams will be consulted on planning applications and the impact of construction will be considered as part of this process.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No consideration has been given to the actual implication of the additional traffic brought to the area, especially considering all of the proposed developments in the area. The road system is already under substantial pressure, particularly the single carriageway portion of the A5 between Milton Keynes and the Towcester roundabout. Also not evident consideration has been given to the disruption caused to the residents during the construction of the site. Furthermore, what studies have been undertaken to demonstrate that the job opportunities to be provided match the need of the local residents?</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: It appears that the developers and Northamptonshire Council are keen to destroy all visible country side and ensure that every major junction in the area is surrounded by warehouses regardless of the impact that may have on the mental and physical wellbeing of the residents.</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>Please provide comments to support your answer: The plan fails to identify the fact that there will be no direct access to the Southbound A43 from the site. As such heavy good vehicles will have to travel through Silverstone village to access that major traffic route. No thought is given to the fact that HGVs will be travelling on a single carriage way past a</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>primary school increase not only the pollution but also the risk to the lives of children who walk to school. The road system in the village was not designed to handle the additional traffic which will be brought in by this development. In addition no consideration has been given to event days at Silverstone Circuit which bring further traffic problems to the area.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: As above.</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: No consideration to the impact of traffic to the, already over used, A5.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: As above.</p>		
SPD070	H Lloyd (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: The SPD doesn't appear to consider existing residential properties in the area of AL5. In the area known as Furtho Pit, Old Stratford Parish, existing medium sized unit sets a precedent along with the previous application to locate ACE Plant on the land between Cosgrove Road and the A508. This</p>	The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. This has been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including	A glossary has been added to help support the understanding of this SPD.



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>area is obscured from Old Stratford and has less impact on residents.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p> <p>Please provide comments to support your answer: The use of size bands is sensible and should prevent developers attempting to propose unacceptable sized units.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p> <p>Please provide comments to support your answer: AL1 is less of a concern to Cosgrove.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL1 is less of a concern to Cosgrove.</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>Please provide comments to support your answer:</p>	<p>existing tree heights and landscaping. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>AL2 is less of a concern for Cosgrove.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL2 is less of a concern for Cosgrove.</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>Please provide comments to support your answer: AL4 is less of a concern for Cosgrove.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL4 is less of a concern for Cosgrove.</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: AL5 was accepted as a development site by SNC, but without any consultation of residents that are going to be greatly affected by any development in this area.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Development in this area has the potential to destroy a village that already suffers greatly from a massive increase in population and traffic during the summer months, with no alternative access to Cosgrove Park. The road infrastructure in this area is barely adequate for today's traffic, with congestion at the Old Stratford roundabout a major concern. With issues experienced when the M1 motorway has been closed the affect on this area has to be considered before any additional logistic operations is allowed to operate from this area. As I am a resident which borders the potential site it would seem likely that future employees will soon learn of the road congestion that already happens along the A508 to Old Stratford roundabout. In this position Stratford Road could be used as an alternative car park for a quicker journey into Milton Keynes via Cosgrove, Castlethorpe and Haversham which would only produce more unwelcome traffic through these small villages.</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: AL5 was sanctioned by SNC, while only stating the area as Furtho Pit which is in Old Stratford Parish. The inclusion of land in Cosgrove Parish was introduced without any supporting communication to make it clear that the proposed area had</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>increased dramatically and will impact on residents. Consider better communication with parish councils and particularly residents who live in the vicinity of AL5. The welfare of people must be a high consideration and being a resident who will live close to the proposed site from the conversations I have had with other Stratford Road residents who live even nearer to the site, the fear of what may be is having a detrimental affect on our health and well being. Keeping all residents better informed and using language that people understand must be of the highest priority.</p>		
SDP07 1	B Fanthorpe (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: I have serious concerns about the volume of traffic produced by these suggestions and the impact on our village. The proposed height of the buildings seems ludicrous when surrounding buildings are taken into consideration.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p> <p>Please provide comments to support your answer: I agree with the methodology but if the original plan was to have small or medium size buildings then why are the proposed buildings as large as suggested?</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: What will be the effect on an already hugely busy and congested roundabout (A43-A5)?</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Should be more limited (effect on traffic/size)</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>Please provide comments to support your answer: What will the buildings be allowed to be so big?</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Again, effect on traffic and impact of huge buildings in that area.</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: Silverstone will become a rat run. We are still a smallish village - this will turn us into a rat run with huge lorries crashing through where our children walk to school</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: There are not adequate transport links to develop this site in this way.</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?: I think that the proposed building will really impact our local area in a hugely negative way. We are a rural area and I do not want to see huge lorries crashing through our village and</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		massive buildings surrounding our towns, forcing more and more cars onto our already congested roads.		
SPD07 2	C Chamberlain (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: AL5- Land at Former Furtho Pit, Old Stratford/Cosgrove. The proposed development in its current form would be an environmental disaster for the area, We are seeing record temperatures in the UK and time is running out for us as a species. A more sensible use of the land would be to plant a native woodland for carbon capture. This would not only be more in keeping with the area, it would create employment opportunities in managing the woodland to create sustainable timber. This could lead the way for similar initiatives nationwide. The impact of the proposal would be negative putting more pressure on an already overstretched and congested highway network. This would lead to a constant flow day and night of HGV's, creating light, noise and smell pollution for residents homes and the scout camp opposite the proposal. As a village we have been told many times by the highway agency that they can't afford additional safety roundabouts at the Castlethorpe, Dogs mouth and turns, so this development would add to the dangers.</p> <p>Cosgrove is revered for its access to the countryside and has many visitors to the area. The proposal to build a distribution centre so close to residents homes, listed buildings and a conservation area is a bad idea and isn't wanted. Cosgrove as a village will fight to stop this luscious proposal.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will</p>	Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Please provide comments to support your answer: AL5 proposal would create too much pressure on the already congested A508 and is far too close to a residential area.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p>	<p>need to mitigated to the satisfaction of the decision maker.</p> <p>Heritage considerations have been taken into account as part of this SPD. This is as well as the need to consider any heritage impacts including listed buildings and conservation area.</p>	



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer:</p> <p>AL5- Land at Former Furtho Pit, Old Stratford/Cosgrove. The proposed development in its current form would be an environmental disaster for the area, We are seeing record temperatures in the UK and time is running out for us as a species. A more sensible use of the land would be to plant a native woodland for carbon capture. This would not only be more in keeping with the area, it would create employment opportunities in managing the woodland to create sustainable timber. This could lead the way for similar initiatives nationwide. The impact of the proposal would be negative putting more pressure on an already overstretched and congested highway network. This would lead to a constant flow day and night of HGV's, creating light, noise and smell pollution for residents homes and the scout camp opposite the proposal. As a village we have been told many times by the highway agency that they can't afford additional safety roundabouts at the Castlethorpe, Dogs mouth and turns, so this development would add to the dangers. Cosgrove is revered for its access to the countryside and has many visitors to the area. The proposal to build a distribution centre so close to residents homes, listed buildings and a</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>conservation area is a bad idea and isn't wanted. The focus on this area should be in keeping with the conservation area of Cosgrove.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: As a whole employment initiatives need careful consideration when they impact the quality of life of residents who live close to the proposed development sites. Time is running out and global warming is showing significant effects as temperatures are drastically rising in the UK. There are so many empty industrial units in and around MK and Northamptonshire, why do we have to destroy more green spaces to create more?</p>		
SPD07 3	S Mills (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: I think the expansion is not in keeping with the existing towns and villages and not providing sufficient impact or mitigation of impact on local people, business and infrastructure.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p>	Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.	The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: As noted above, it is not in keeping with the local area.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p> <p>Please provide comments to support your answer: It is too high and large for both the area and infrastructure.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>Please provide comments to support your answer: It is a poor choice of location, it will be visually impactful from the local community and it does not allow ease of access to or from the site without significant damage to the local community.</p>	<p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	<p>stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: It should have a lower height so it cannot be seen and only allow the size of units to be in keeping with the local restrictions already in existence for the units at Silverstone circuit. In addition it needs to have its own access directly to and from the A43 and traffic under no circumstances should be allowed access through Silverstone or Whittlebury villages.</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: You have not considered the impacts at all on the local communities and the infrastructure needs to support such developments.</p>		
SPD074	A Taylor (Online response)	4 The SPD sets out a number of overarching design principles. Do you agree with these? No	The scope of the SPD is to establish general guidance and design	Amendments have been made

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: The size of this development is inappropriate for proposed location. Close to a conservation area, and inadequate road networks.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Please provide comments to support your answer: If the Stratford Road fields must be developed it should be small low level buildings in this area. Warehousing provides little employment opportunity. Many operate autonomously in darkness.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p>	<p>principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This includes the impact on any heritage assets such as conservation areas or listed buildings.</p>	<p>to the SPD in consultation with the Environment Agency. The Environment Agency have environmental responsibilities including flooding.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: This is a huge proposed development in a totally inappropriate location. It will have a huge impact of the village of Cosgrove and their access in and out of the village to the A508. Current business there is very small and low key The infrastructure is totally inadequate - the A508 and the A5 are already a bottle neck at large parks of the day. Additional heavy vehicles will only make this worse. Vehicles heading to the M1 will either be travelling through Milton Keynes, heading up the A508 or travelling down A5 through Hockliffe which is again, already a bottleneck.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No - there is more land next to it which the owner will want to develop Cosgrove is a conservation area and it is important that the historical interest are not destroyed</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: A further concern is the flooding aspect. The river is just to the south of this development significant flood area. Any risk that raises to flood levels will have a huge detrimental impact on Stony, Wolverton Mill and further along the river. These concerns together with the impact on roads, safety and light pollution cannot be ignored</p>		
SPD075	K Hughes (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: It will change the entire village dynamic. Making something so beautiful, peaceful into something chaotic and definitely not like a village</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p>	The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD076	S Smith (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: Not clear and not limited aspirations to build ridiculous oversized building which is unlikely to provide local employment as was the aim of South Northants Council.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p>	The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.	Further wording has been added to the SPD to ensure that issues such as noise and light pollution is considered as part of the planning application process.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: Employment opportunities are highly unlikely to be sufficient when compared to the damage to the local environment. Constraints are not strict enough to prevent overdevelopment of the land.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Use of Swan Valley units as the reference point for Large Units is inappropriate. Comparing the size of the units to that of a site adjacent to the M1 and those by the A508 and in a residential area is not a sensible comparison. Will have a large impact on highways which already struggle to cope with the volume of traffic. Noise will increase, light pollution will increase which in turn negatively impacts the conservation of green areas.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD077	H Armstrong-Smith (Online response)	<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: Making a comparison with the units at Swan Valley is inappropriate - that's next to the M1, not a small Northamptonshire country village. The A508 is already over used and an accident blackspot - this will hugely increase traffic and risk. The additional noise, light and disturbance of a currently wild area will hugely impact the wildlife that lives there. There are deer, foxes, voles, swans, ducks, birds of prey..... If there must be a development here it should be low level and not illuminated.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: See comments above</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: Developing this site will only be the start, it will provide access to the fields between Cosgrove and Wolverton Mill which have already been under threat.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Planning applications will need to be supported by ecological surveys and to include opportunities for biodiversity net gain.</p>	<p>Additional wording will be added to the SPD to ensure that issues such as noise and lighting and considered as part of the planning application process.</p>
SPD078	Incomplete online response			

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD079	K Miller	<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: There many such units within MK and Northants which are empty, I therefore feel that building any further units would not be beneficial and would not provide many jobs for the area.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: The suggested development for the area is far to vast for the area and would cause light and noise pollution, and completely devastate a beautiful green space and wild life area. The congestion within the area is already high and such a development would only add to the problem. Smaller units would benefit the area far more, with the development of housing around the area, gyms/sport centre small units to in courage small businesses to develop would be far more beneficial. With so many huge industrial units laying empty there is absolutely no justification in building more.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.</p> <p>As part of the planning application process, any adverse impacts on communities and the natural environment which are identified will need to mitigated to the satisfaction of the decision maker.</p>	Additional wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.
SPD080	I Keech (Online response)	<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: The size of the proposed units will dominate the landscape for miles around and cause untold noise and light pollution to the local residents and disturbance to the wildlife that currently</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation</p>	Strengthening of wording has been added to the SPD to ensure that issues such as

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>inhabit the area including , (protected) and nearby The site also borders the old Buckingham canal which is a designated conservation area. Most modern warehouses operate autonomously, so there will be little employment opportunities offered by a development of this kind. The proposed site will however see countless vehicle movements adding more poisonous and warming fumes into the local atmosphere.</p> <p>The development includes a new entry way onto the A508 which already suffers from lengthy queues in rush hour - up to and past the Northampton Road exit, adding more traffic especially articulated lorries which take up the space of 3 or 4 cars, will mean this already stretched part of road will put further strain on other nearby roads to compensate. If there must be a new entrance to the site, then I would suggest one from/to the A5 would be more suitable.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: The plan makes reference to the 'Swan Valley' units as a comparison, however comparing a site that borders a three-lane motorway (M1), and a rural A road in a residential area used by walkers and cyclists (A508) is not a fair assessment.</p> <p>The proposed site borders a scout camp and with warehouses planned to be built directly opposite where the children currently camp, there is no doubt the night time noise and loss of natural light during the day will lead to a loss of rural experience for countless children of future generations.</p>	<p>implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>noise and light are considered as part of the planning application process.</p> <p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		If there must be development then smaller units in line with those found nearby on the Northampton Road should be used as a benchmark.		
SPD08 1	P Simpkins (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	Strengthening of wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: Road to busy</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Wrong area to rural , loads of unnecessary noise and light pollution.</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: Detrimental to the environment Unnecessary disturbance To near residential area, and Scout campsite. Could engulf public wildlife area. Could be smells . Extra traffic.</p>		
SPD08 2	C Barrand (Online response)	4 The SPD sets out a number of overarching design principles. Do you agree with these? No	The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: I believe each development should be considered on its merits in its spatial context. You cannot use references relating to existing developments .</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Please provide comments to support your answer: The term 'small' is a misnomer if Swan Valley is a comparative</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p> <p>Please provide comments to support your answer: I believe that no serious consideration has been given to the impact of the development and additional roundabout will have on congestion in Towcester, especially as it is so close to the already congested A43/A5 interchange</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: There is no real consideration of vehicle movements, pollution or impact on the rural environment and wildlife. It is an affront to local democracy that consultation on such development and the local plan were minimal during the pandemic. Decisions which</p>	<p>supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications.</p> <p>As part of the planning application process, any adverse impacts on communities and individual</p>	



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>should have gone out to proper local consultation were bulldozed through even though it was known that there would be significant opposition</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: There has been insufficient identification of the constraints. The additional traffic it's impact on wildlife, adverse impact on local communities has not been considered. There is already a labour shortage, so placing emphasis on employment opportunities to the detriment of wildlife and the environment is wrong</p>	<p>properties which are identified will need to be mitigated to the satisfaction of the decision maker. This includes environmental impacts.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: The emphasis should be on the environmental impact.</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p> <p>Development, if really necessary, should be small scale and in keeping with the semi rural nature of the site. The government is moving towards making new development attractive, something locals can be proud of and what has been put forward for Furtho pit and Cosgrove, is not</p>		
SPD083	O Simpkins (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: Too many and too large</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Please provide comments to support your answer: Using all natural green areas</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	<p>Strengthening of wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: It will be low employment.</p>		application process.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The noise and light pollution will have a huge impact on peoples lives not to mention wildlife habitat</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: This land could be developed on a much smaller scale with low rise buildings and not 24 hr usage</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?: We love the Northamptonshire countryside and this is being eroded due to the detriment to wildlife .</p>		
SPD08 4	P Steane (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Not Answered</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Not Answered</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: Comparing unit size to a site adjacent to the M1 and this one in a residential area is not a comparison at all. Huge impact on highways.</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: It accesses onto narrow country roads. Major lorry movements will cause disruption. A 24 hour operation will impact life in a very quiet area of the county.</p> <p>Noise disturbance and light pollution as well as an impact on an already specified conservation and green area.</p> <p>Warehousing is not a major employment opportunity. Most will operate autonomously. I'm sorry I'm not very good at this [Redacted Text].</p>		
SPD085	J Illingworth	<p>This letter is in particular response to the draft SPD for employment site allocations concerning the following allocated sites and the wider area in which they are located:</p> <ol style="list-style-type: none"> <li>1. <b>AL1 - Land at Bell Plantation, Towcester</b></li> <li>2. <b>AL2 - Land at Woolgrowers Field, Towcester</b></li> <li>3. <b>AL4 - Employment Land, Shacks Barn, Whittlebury</b></li> </ol> <p>We refer to the Council's website information in relation to the above and wish to express our serious concerns, particularly relating to the following criteria:</p> <p><b><u>TRAFFIC</u></b></p> <ol style="list-style-type: none"> <li>1. <b>Highways impact:-</b> Traffic generated from the proposed developments would have an unacceptable</li> </ol>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>impact not only from cars for employees and visitors, but particularly HGV's and LGV's. The proposals for all these sites would indicate multiple HGV loading bays at the large units leading to a significant and concentrated increase in such vehicles travelling through the local areas.</p> <p>2. <b>Road safety and pollution:-</b> Increased traffic along the A413 through Siverstone and Whittlebury villages will pass Primary Schools and through concentrated residential areas, thereby increasing the accident risk to young children together with noise and air pollution. The proposed <b>Silverstone Village Neighbourhood Plan</b> indicates that the majority of any future development will be along both sides of the A413 to the north of its Primary School (closer to the AL4 site), which will be materially affected by any increased traffic from that proposed business park development.</p> <p>3. <b>Suggested Amendment:-</b> The SPD should require that a <b>cumulative</b> traffic assessment be undertaken for <b>all</b> these sites, including Tiffield Road (AL3), so as to consider the potential total detrimental impact to <b>all</b> the surrounding areas.</p> <p><b><u>DEVELOPMENT IMPACT</u></b></p> <p>4. <b>Landscape impact:-</b> It is being suggested that units are large in scale and some are proposed to be up to 15 metres high, with those at site AL1 being up to 16 metres high and at AL2 up to 12 metres. The highest building locally is only 9.5 metres.</p>	<p>highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. However, there may be the opportunity for development proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area. Large proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by the benefits.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual</p>	<p>shape a proposal for each site. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.</p>

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		<p>5. <b>Light pollution:-</b> Given that there is likely to be dusk-to-dawn floodlighting every night at these sites the detrimental effects will be visible for miles around.</p> <p>6. <b>Building footprints:-</b> The original Local Plan allowed for only small and medium sized units. The maximum size of units at the Silverstone Circuit area is 5,000m<sup>2</sup>. The proposal to permit large units of 8,000m<sup>2</sup> and above with no upper limit will allow for buildings that are domineering and unsympathetic to the rural surroundings contributing even further to the detrimental visual amenity of the area. In addition, such large structures will inevitably lead to increased HGV movements, as mentioned above.</p> <p>7. <b>Possible mitigation:-</b> Even the provision of landscaping belts within these sites will not cancel these issues and the impact can only be described as unacceptable.</p> <p>8. <b>Suggested Amendment:-</b> In order to minimise the negative impact of these developments the SPD should ensure that all new buildings should:</p> <ul style="list-style-type: none"> <li>• have a maximum ridge height of 10 metres</li> <li>• only be small and medium sized units each with a maximum footprint area of 5,000 square metres</li> </ul>	<p>information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>Certain wording in the SPD has been strengthened to ensure that issues such as noise and light are considered as part of the planning application process.</p>
SPD086	P Larkin	<p>I would like to register my concern at the continued attempts to increase the scope and size of the proposed Shacks Barn Development. In particular I am concerned that HGVs travelling on A43 from the M40 will use the junction south of Silverstone</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	<p>No changes necessary.</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>and continue on the A413 through the village to access Shacks Barn.</p> <p>Conversely HGVs leaving the site to travel to M40 will use A413 through the village to join the A43 at the Silverstone junction south of the village. Any further development at the site should be resisted until the A43 junction north of the village is altered to provide a northbound exit and a southbound entry thus removing the need for HGVs to use the A413 through the village.</p> <p>I believe an alternative solution is proposed to 'ask' HGV drivers to use the Abthorpe roundabout on A43 to reverse direction and use the restricted access junction north of the village giving direct access and exit to Shacks Barn. I can't imagine drivers wanting to perform such a manoeuvre which anyway will have added several miles to their journey. Given that the Abthorpe roundabout is very busy at the best of times and comes to a standstill at times this seems an inappropriate and possibly downright dangerous proposal.</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Detailed requirements regarding traffic movements will be dealt with at a planning application stage.</p>	
SPD08 7	C & J Green	<p>Comments on the SPD as follows</p> <p>1. Conflict of interest The SPD has been put together on WNCs behalf and their request by planning consultants, Barton Willmore. On Barton Willmores website it details their long standing relationship with the developer in this planning application DHL and therefore this paper cannot be taken as objective guidance for the council</p> <p>2. Under government planning guidance a council must take into account its strategic objectives when deciding on planning development One of its objectives is to provide a range of</p>	<p>Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner.</p> <p>The SPD has been prepared and refers to the LTP2's objectives. The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy,</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will</p>

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		<p>skilled jobs for local people With one of the best secondary schools in the UK it is sad to think the best these young people can aspire to locally is to work in a warehouse on zero hours minimum wage. It would seem the strategic objective has not been met</p> <p>3. The SPD does not take into consideration the commulative traffic impact of commercial and residential projects already built or approved at Brackley,M1junction warehouses, 4000 new homes in Towcester, Silverstone new home construction, Hulcote development and rail interchange at the M1 all impacting A43 and A5. A thorough commulative traffic impact plan is required on these projects hitting the inadequate A43/A5 roundabout which is unable to take HGVs in quantity now DHLs own estimation was for 370 HGV novements an hour....think about it. Neither the road nor roundabout can take it. Relief road or not</p> <p>4. Size of unit / development. With Hulcote/Tiffield already approved and so many more warehouses under development or built far better located near M1 or rail interchange it seems non sensical to build more warehousing in a location that patently cannot take the traffic. If development is to go ahead as per the local plan it should be in scale with buildings around it. Clearly small to medium not large nor joined together to make larger units. Likewise heights of buildings should be commensurate with those surrounding them not towering above everything</p> <p>5. Air quality - it is the councils responsibility to provide a safe healthy environment for its community. It already advises closing windiws on Watling St because of air quality. Increased</p>	<p>provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be</p>	<p>need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>traffic caused by development at this level will increase poor air quality and health risks</p> <p>6. Risk of death / accident. The A5/A43 roundabout is already highly dangerous. With increased traffic capacity and its inability to cope with HGVs there will be a higher risk of accident or death on this roundabout</p> <p>The councils own assessment is the infrastructure is "already at capacity" this cannot be approved on all the above grounds the the councils inability to provision for infrastructure of all types to support a growth of this type.</p> <p>As is usual the Highways consultation about the A5 follows after this paper closes whose input to this is clearly relevant. Perhaps better results may be obtained by joined up bigger scale thinking</p>	<p>an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	
SPD088	B Canavan	<p>I am writing to express my concern over the proposed development at Shacks Barn. I have been a resident of the village for nearly 20 years and am now in my eighties. It is a huge concern to me that the potential for increased traffic in the village will put me at risk as I walk around the.</p> <p>Since the bypass went in we've been lucky enough to enjoy sensible levels of traffic on what was the old A43. We are in danger of the traffic levels getting out of hand as the village is used as a rat run.</p> <p>We are fortunate that our community is safe and we would like to keep it that way. We have more younger children with the new housing developments and a substantial elderly community that rely on safe roads. This proposal will, in my opinion, remove the safety we currently feel as large lorries come through the village at pace in an effort to complete their work in good time.</p> <p>This is a lovely community please help us keep it that way.</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	No changes necessary.

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			<p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	
SPD089	A Lester	<p>To whom it may concern  We have lived in Silverstone for 23 years and have enjoyed living in this rural community.  However due to the intended development we see the area changing dramatically and having a negative impact on all aspects of everyday life, from increased traffic, visual impact, noise, pollution, light pollution. Please will you take these objections into consideration when making your decision:</p> <p><b>Traffic</b>  I am very concerned that these intended plans if they are given permission will create a huge increase in the number of vehicles that use the local roads. These will include HGV's supplying the warehouses. The development at Silverstone has no access to the south A43 without going through the village of Silverstone. The bypass was originally built to alleviate traffic flow/bottle necks and noise through the village. There is now a primary school on the main road street which would be impacted by the increase of traffic.</p> <p><b>Building Footprints</b>  We are concerned that a deviation from the original local plan which was to allow for small and medium sized units only will impact on the environment. It will be a visual eyesore and again</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>With regard to building heights and footprints, this has been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>no amount of landscaping will hide this monstrous development. Once illuminated will be seen for miles.</p> <p>Heights The intended heights up to 15 metres is ridiculous and this rural area will be blighted for generations. There is no need for this development in a rural country town. These buildings are better suited to the M1 corridor given them access to the main traffic routes. Again the height of any development should be restricted to a maximum ridge height of 10 metres. Once again the intended 24/7 lighting will be seen for miles having a dramatic impact on the visual environment, light pollution and wildlife.</p>	<p>heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	
SPD090	E Tye	<p>I am writing to raise my objection to the developments of the Bell Plantation, Shacks Barn and Woolgrowers Field. i do not believe the developers have shared the true account of the impact on the local community. I use the A43 every day for work and to collect my child I believe the impact of the traffic from these developments will be huge, and will add to an already congested A43, the Towcester roundabouts are already frequently at standstill. I also object as i believe the HGVs will use the A413 which runs right through the beautiful village of Silverstone rather than using the A43, this causes me worry to the amount of accidents that will be waiting to happen. I also object as the original local plan was for small/medium units but now the draft SPD is for large units. This will have a very detrimental impact on the stunning local countryside, and wildlife.</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The employment allocations were identified to meet local demand and</p>	No changes necessary.

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			<p>strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	
SPD09 1	C Aires	<p>I am aware that the plans by Clowes for Shacks Barn have been updated but it ignores the residence concerns and does not protect us!</p> <p>Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3 (which already has planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no southbound access into the A43, meaning all vehicles travelling south will pass directly through Silverstone village (past the primary school where most</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>children/parents walk to and from the school along the path next to the road) or Whittlebury.</p> <p>AL3 (Tiffield Lane) which already has planning permission, should be subject to the same SPD conditions on all future developments within that site ie on changes and extensions to the existing planning permission on that site. The size of the buildings that have already been allowed on this site must not be used as a precedent for the other sites.</p> <p>The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p> <p>Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn. and should not be used as a precedent. It is Strategic Development, whereas the LP2 allocations are ALL for Non-Strategic Development.</p> <p>The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be defined and specific – it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location. The existing development at Bell Plantation would be a good example of this.</p> <p>No building to be taller than any existing building on a nearby site ie for AL1 and AL2 this is site 4 (on page 28 of the SPD)</p>	<p>into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>and for AL4 this is site 6/Silverstone Business Park/Shacks Barn (on page 30 of the SPD).</p> <p>The control of the maximum ridge height of buildings on AL1 and AL2 should be 10 metres, whereas the maximum ridge height for the buildings at AL4 should be 7 metres. This is because of its rural location and position on the Whittlewood Ridge which lends to far reaching visibility of the site. That is the precedent for the local area and would fit with the intent of the Local Plan (2) for small and medium sized units.</p> <p>It should be clarified that smaller/medium buildings cannot be joined up at later dates to form larger units.</p> <p>On page 24, para 3.2 we advise that 'in part' is removed from the role of the employment sites. These sites were never intended only as 'in part' for small, medium developments but rather, the WHOLE of the LP2 is for small and medium development.</p> <p>Screening using trees must be large scale, not planted with the possibility of full screening only after 15 years. Further, maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable screening.</p> <p>The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. This is of particular importance for AL4, where the developer has already attempted to increase the</p>		



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		<p>development site area by 28% through placing the drainage ponds outside of the allocated land area.</p> <p>All these employment allocations were based upon fulfilling employment needs to reduce out-commuting. There is no evidence base for unskilled or low skilled warehouse jobs in South Northants. Developers need to demonstrate how their development will meet local skills requirements. They need to set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on types of jobs.</p> <p>We understand progress has to be made and this is not just about protecting our historic village of Silverstone, it's about making sure this progress does not negatively impact our and the villages families health and safety for generations to come.</p>		
SPD09 2	J Evans	<p>I am aware that the plans by Clowes for Shacks Barn have been updated but it ignores the residence concerns and does not protect us!</p> <p>Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3 (which already has planning permission) is operating.</p> <p>The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no southbound access into the</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best</p>

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		<p>A43, meaning all vehicles travelling south will pass directly through Silverstone village (past the primary school where most children/parents walk to and from the school along the path next to the road) or Whittlebury.</p> <p>AL3 (Tiffield Lane) which already has planning permission, should be subject to the same SPD conditions on all future developments within that site ie on changes and extensions to the existing planning permission on that site. The size of the buildings that have already been allowed on this site must not be used as a precedent for the other sites.</p> <p>The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p> <p>Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn. and should not be used as a precedent. It is Strategic Development, whereas the LP2 allocations are ALL for Non-Strategic Development.</p> <p>The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be defined and specific – it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location. The existing development at Bell Plantation would be a good example of this.</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>No building to be taller than any existing building on a nearby site ie for AL1 and AL2 this is site 4 (on page 28 of the SPD) and for AL4 this is site 6/Silverstone Business Park/Shacks Barn (on page 30 of the SPD).</p> <p>The control of the maximum ridge height of buildings on AL1 and AL2 should be 10 metres, whereas the maximum ridge height for the buildings at AL4 should be 7 metres. This is because of its rural location and position on the Whittlewood Ridge which lends to far reaching visibility of the site. That is the precedent for the local area and would fit with the intent of the Local Plan (2) for small and medium sized units.</p> <p>It should be clarified that smaller/medium buildings cannot be joined up at later dates to form larger units.</p> <p>On page 24, para 3.2 we advise that 'in part' is removed from the role of the employment sites. These sites were never intended only as 'in part' for small, medium developments but rather, the WHOLE of the LP2 is for small and medium development.</p> <p>Screening using trees must be large scale, not planted with the possibility of full screening only after 15 years. Further, maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable screening.</p> <p>The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. This is of</p>		

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		<p>particular importance for AL4, where the developer has already attempted to increase the development site area by 28% through placing the drainage ponds outside of the allocated land area.</p> <p>All these employment allocations were based upon fulfilling employment needs to reduce out-commuting. There is no evidence base for unskilled or low skilled warehouse jobs in South Northants. Developers need to demonstrate how their development will meet local skills requirements. They need to set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on types of jobs.</p> <p>We understand progress has to be made and this is not just about protecting our historic village of Silverstone, it's about making sure this progress does not negatively impact our and the villages families health and safety for generations to come.</p>		
SPD093	A Aires	<p>I am aware that the plans by Clowes for Shacks Barn have been updated but it ignores the residence concerns and does not protect us!</p> <p>Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3 (which already has planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be</p>

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		<p>Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no southbound access into the A43, meaning all vehicles travelling south will pass directly through Silverstone village (past the primary school where most children/parents walk to and from the school along the path next to the road) or Whittlebury.</p> <p>AL3 (Tiffield Lane) which already has planning permission, should be subject to the same SPD conditions on all future developments within that site ie on changes and extensions to the existing planning permission on that site. The size of the buildings that have already been allowed on this site must not be used as a precedent for the other sites.</p> <p>The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p> <p>Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn. and should not be used as a precedent. It is Strategic Development, whereas the LP2 allocations are ALL for Non-Strategic Development.</p> <p>The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be defined and specific – it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location. The existing development at Bell Plantation would be a good example of this.</p>	<p>impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles</p>

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SPD094	S Aires	<p>I am aware that the plans by Clowes for Shacks Barn have been updated but it ignores the residence concerns and does not protect us!</p> <p>Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3 (which already has planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no southbound access into the A43, meaning all vehicles travelling south will pass directly through Silverstone village (past the primary school where most children/parents walk to and from the school along the path next to the road) or Whittlebury.</p> <p>AL3 (Tiffield Lane) which already has planning permission, should be subject to the same SPD conditions on all future</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>Wording 'in part' has</p>

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		<p>developments within that site ie on changes and extensions to the existing planning permission on that site. The size of the buildings that have already been allowed on this site must not be used as a precedent for the other sites.</p> <p>The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p> <p>Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn. and should not be used as a precedent. It is Strategic Development, whereas the LP2 allocations are ALL for Non-Strategic Development.</p> <p>The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be defined and specific – it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location. The existing development at Bell Plantation would be a good example of this.</p> <p>No building to be taller than any existing building on a nearby site ie for AL1 and AL2 this is site 4 (on page 28 of the SPD) and for AL4 this is site 6/Silverstone Business Park/Shacks Barn (on page 30 of the SPD).</p> <p>The control of the maximum ridge height of buildings on AL1 and AL2 should be 10 metres, whereas the maximum ridge height for the buildings at AL4 should be 7 metres. This is because of its rural location and position on the Whittlewood Ridge which lends to far reaching visibility of the site. That is the precedent for the local area and would fit</p>	<p>information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>been removed. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>



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		<p>with the intent of the Local Plan (2) for small and medium sized units.</p> <p>It should be clarified that smaller/medium buildings cannot be joined up at later dates to form larger units.</p> <p>On page 24, para 3.2 we advise that 'in part' is removed from the role of the employment sites. These sites were never intended only as 'in part' for small, medium developments but rather, the WHOLE of the LP2 is for small and medium development.</p> <p>Screening using trees must be large scale, not planted with the possibility of full screening only after 15 years. Further, maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable screening.</p> <p>The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. This is of particular importance for AL4, where the developer has already attempted to increase the development site area by 28% through placing the drainage ponds outside of the allocated land area.</p> <p>All these employment allocations were based upon fulfilling employment needs to reduce out-commuting. There is no evidence base for unskilled or low skilled warehouse jobs in South Northants. Developers need to demonstrate how their development will meet local skills requirements. They need to set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on types of jobs.</p> <p>We understand progress has to be made and this is not just about protecting our historic village of Silverstone, it's about making sure this progress does not negatively impact our and the villages families health and safety for generations to come.</p>		

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SPD095	M Aires	<p>I am aware that the plans by Clowes for Shacks Barn have been updated but it ignores the residence concerns and does not protect us!</p> <p>Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3 (which already has planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no southbound access into the A43, meaning all vehicles travelling south will pass directly through Silverstone village (past the primary school where most children/parents walk to and from the school along the path next to the road) or Whittlebury.</p> <p>AL3 (Tiffield Lane) which already has planning permission, should be subject to the same SPD conditions on all future developments within that site ie on changes and extensions to the existing planning permission on that site. The size of the buildings that have already been allowed on this site must not be used as a precedent for the other sites.</p> <p>The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy,</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the</p>

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		<p>maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable screening.</p> <p>The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. This is of particular importance for AL4, where the developer has already attempted to increase the development site area by 28% through placing the drainage ponds outside of the allocated land area.</p> <p>All these employment allocations were based upon fulfilling employment needs to reduce out-commuting. There is no evidence base for unskilled or low skilled warehouse jobs in South Northants. Developers need to demonstrate how their development will meet local skills requirements. They need to set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on types of jobs.</p> <p>We understand progress has to be made and this is not just about protecting our historic village of Silverstone, it's about making sure this progress does not negatively impact our and the villages families health and safety for generations to come.</p>		
SPD09 6	M Aires	<p>I am aware that the plans by Clowes for Shacks Barn have been updated but it ignores the residence concerns and does not protect us!</p> <p>Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design</p>

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		<p>(which already has planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no southbound access into the A43, meaning all vehicles travelling south will pass directly through Silverstone village (past the primary school where most children/parents walk to and from the school along the path next to the road) or Whittlebury.</p> <p>AL3 (Tiffield Lane) which already has planning permission, should be subject to the same SPD conditions on all future developments within that site ie on changes and extensions to the existing planning permission on that site. The size of the buildings that have already been allowed on this site must not be used as a precedent for the other sites.</p> <p>The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p> <p>Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn. and should not be used as a precedent.</p> <p>It is Strategic Development, whereas the LP2 allocations are ALL for Non-Strategic Development.</p> <p>The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be defined and specific – it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location. The existing</p>	<p>development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p>	<p>work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>development at Bell Plantation would be a good example of this.</p> <p>No building to be taller than any existing building on a nearby site ie for AL1 and AL2 this is site 4 (on page 28 of the SPD) and for AL4 this is site 6/Silverstone Business Park/Shacks Barn (on page 30 of the SPD).</p> <p>The control of the maximum ridge height of buildings on AL1 and AL2 should be 10 metres, whereas the maximum ridge height for the buildings at AL4 should be 7 metres.</p> <p>This is because of its rural location and position on the Whittlewood Ridge which lends to far reaching visibility of the site. That is the precedent for the local area and would fit with the intent of the Local Plan (2) for small and medium sized units.</p> <p>It should be clarified that smaller/medium buildings cannot be joined up at later dates to form larger units.</p> <p>On page 24, para 3.2 we advise that 'in part' is removed from the role of the employment sites. These sites were never intended only as 'in part' for small, medium developments but rather, the WHOLE of the LP2 is for small and medium development.</p> <p>Screening using trees must be large scale, not planted with the possibility of full screening only after 15 years. Further, maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable screening.</p> <p>The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. This is of particular importance for AL4, where the developer has already attempted to increase the development site area by 28% through placing the drainage ponds outside of the allocated</p>	<p>Any harm would need to be outweighed by benefits.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	<p>assessment in line with the general principles set out in the SPD.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>land area.</p> <p>All these employment allocations were based upon fulfilling employment needs to reduce out-commuting. There is no evidence base for unskilled or low skilled warehouse jobs in South Northants. Developers need to demonstrate how their development will meet local skills requirements. They need to set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on types of jobs.</p> <p>We understand progress has to be made and this is not just about protecting our historic village of Silverstone, it's about making sure this progress does not negatively impact our and the villages families health and safety for generations to come.</p>		
SPD097	D & A Wood	<p>We welcome the introduction of a Supplementary Planning Document (SPD) for the development sites AL1, 2, 4 and 5. The saga of the Local Plan, and especially its consultation process, has been a sorry tale indeed and the SPD will go some way to mitigating the major errors made by the Local Plan. We are only sorry that AL3 is excluded from the SPD and, as a result, Towcester and its hinterland will be saddled with a completely inappropriate development that future generations will have to live with.</p> <p>Aside from specific comments below we consider that much of the wording across the document needs to be much tighter. At present the SPD is littered with 'may', 'should', 'seek to', 'where possible', 'explore', 'look to', 'could', etc. The purpose of the SPD is to reduce uncertainty and provide clear guidance to landowners, developers, planners and the local community. Tightening the wording will help this.</p> <p>We have focused particularly on development site AL1, although we have some comments on AL2 and AL4. We have no comments on the sections of the SPD relating to AL5 but will</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>A 'Viewing Corridor' to the framework in order to highlight the importance of the visual relationship between Greens Norton Church spire and Easton Neston House. The wording relating to frontages onto the A5 and Towcester Road has been strengthened.</p> <p>The SPD reiterates the need for further assessment work to be undertaken by applicants, particularly in relation to doing a thorough landscape and visual assessment. This is stated at the</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>leave that to those local groups directly affected by the proposed AL5 development.</p> <p><b>1.7</b> We believe that <b>the SPD should emphasise that sites AL1-4 were identified to facilitate some small scale employment opportunities to provide additional choice and opportunity for the growing population associated with the strategic development site to the south of (Towcester).</b> To date the proposals for all 4 development sites appear to have completely lost sight of this requirement.</p> <p><b>South Northamptonshire's Economic Growth Strategy 2.6 and 2.22</b> You rightly describe the 5 roles set out in the Part 2 Local Plan as very clear to ensure they meet local demand. We agree and suggest that the <b>SPD needs to reinforce the importance of developments needing to meet all the 5 tests</b> namely:</p> <ul style="list-style-type: none"> <li>• Meet local demand and strengthen the rural economy;</li> <li>• Provide the ability to strengthen local supply chains;</li> <li>• Local flexibility and choice of locations;</li> <li>• Meet the demand for small and medium sized units; and contribute to reducing the level of out-commuting.</li> </ul> <p><b>2.15</b> We have a number of observations on this section: <b>Manufacturing.</b> The Joint Core Strategy states that <i>some elements of manufacturing related to the high performance technologies sector are growing but often means fewer employees.</i> We agree. What the strategy fails to mention is that exactly the same is happening with warehousing but on a much larger scale and without the benefit of high performance technology jobs at scale.</p> <p><b>Warehousing.</b> We note that <i>delivering new space to cater for the warehousing sector on a trend-based trajectory would not</i></p>	<p>start of the 'Assessment &amp; Evaluation' and 'Landscape &amp; Visual Consideration' sections.</p> <p>indicate where the existing landscape structure of each site could be strengthened/enhanced to accommodate new development. In terms of putting in an active frontage along the northern edge, there is already a new footpath link indicated as well as a belt of structural tree planting, any new development in this area of the site will also have to take cognisance of impacts on viewpoints south from Caldecotte.</p>	<p>A 'Viewing Corridor' to the framework in order to highlight the importance of the visual relationship between Greens Norton Church spire and Easton Neston House. The wording relating to frontages onto the A5 and Towcester Road has been strengthened. Additional wording has been added regarding AL3 to set out that</p>



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		<p><i>be desirable nor sustainable in the long term in order to achieve a balanced economy.</i> Unfortunately the current proposals for all 4 sites are completely trend-driven with no provision for future growth requirements.</p> <p><b>Research and Development.</b> South Northants has a very rich history of applied R&amp;D in areas such as automotive advanced manufacturing. None of the current proposals for all 4 development sites appear to meet this objective</p> <p>2.21 We consider that the <b>SPD needs to reinforce that the aim of the Local Plan is to attract new investment and provide more jobs to match the skills of local people.</b> Local skills means meeting the needs of Towcester and South Northants where skills and education attainment are significantly higher than those of West Northants and the region, otherwise there is a real risk of lowering rather than raising aspirations.</p> <p>2.23 The employment sites are to be accompanied and supported by an independent study providing market led evidence on the proportion of B1, B2 and B8 uses to be delivered. <b>The SPD needs to remind developers that the study needs to be truly independent and based on market demand, not on justifying their proposed use.</b> To be demonstrably independent these need to be jointly commissioned by the developer and WNC.</p> <p><b>Socio-Economic Context</b> 2.29 to 2.35 We consider that <b>more emphasis needs to be placed in the SPD on the socio-economic context for Towcester and South Northants.</b> You rightly point out that South Northants' skills and educational attainment are significantly above those of the East Midlands (and West</p>		<p>alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Northants): Quality of Life Survey, prosperous with a highly skilled workforce, one of the lowest unemployment rates, higher than average number of residents employed in managerial, professional and skilled occupations, etc. Unfortunately this data appears to have been ignored by DHL. They commissioned Savills in February this year to carry out a labour market assessment which claimed that local skills and educational attainment were worse than the regional average. This painted a completely misleading picture of local skills and educational attainment since it was based on West Northants data. We have produced a comparison table in Appendix A using Nomis data (same source as Savills) to emphasise the point.</p> <p>What the <b>SPD does not address is that developers need to demonstrate <i>how</i> their development will meet local skills requirements</b>. They need to set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on types of jobs. For instance Savills/DHL just stated the types of employment they expected may be created but with no attempt to state actual numbers. A commercial developer may be better placed to have a strong indication of likely demand through local commercial agents' pipeline of prospective business occupants.</p> <p><b>M1 Corridor – Scale, Form and Character</b>  3.3-3.5 We note the SPD's wish to use Swan Valley and other large scale developments along the M1 as a comparison to the developments sites round Towcester. We would make the point that Swan Valley is a designated strategic site that has no similarities whatsoever with the non-strategic sites in Towcester. It is an open, very large group of sites, with no established housing nearby, and immediately next to a major</p>		

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		<p>arterial route which is one of the busiest motorways in the UK. You point out that it largely consists of very large scale, predominantly distribution developments. <b>The SPD needs to be quite clear that Swan Valley does not set a precedent for Towcester, or better still do not use it as a comparison.</b></p> <p><b>AL1 &amp; AL2 – Towcester A43 Junctions and AL4 Technology Park</b>  3.10 and 3.12-3.14 We note that the SPD recognises that the scale of development at Old Greens Norton Road and Tove Valley Business Park varies between 350m2 and 5,000m2. Even at Silverstone Business Park and Silverstone Park the units vary between 250m2 and 5,000m2. We further note that the SPD acknowledges that <i>there is a corridor of technology-related employment emerging along this stretch of the A43</i>. We think that the <b>SPD is selling Towcester short. There is considerable scope for the technology corridor to extend from Silverstone to the Towcester Northern Gateway</b> – an approach which has a far closer fit with the skills and educational attainment levels in the vicinity.</p> <p><b>Rural Setting North of A43</b>  3.15-3.17 We note and agree your assessment of the area surrounding AL1 and AL2 to the north of the A43 as characterised by <i>land form that gently slopes north to south down to the River Tove with views from the public road and path network towards Towcester and the wider countryside</i>, and that there are a series of small settlements largely of a height and scale in keeping with that of large agricultural buildings in the area. <b>The SPD needs to be quite clear that a large agricultural building, such as that shown in Figure 19, does not in any way relate to a large warehouse</b></p>		

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		<p><b>building.</b> In fact it is more likely to be similar to a small industrial unit (using the SPD's definition on p39).</p> <p>3.18 We support the SPD's view that <i>the ability to provide development whose form and scale considers/reflects the rural character of this area through built or landscape elements will enable a more gradual and sensitive transition from North Towcester to the surrounding countryside. We believe that the SPD should place a much stronger emphasis on this key consideration.</i></p> <p><b>Towcester Northern Gateways</b></p> <p>3.20 <b>We completely disagree with the statement: <i>if delivered sensitively and in line with policy this could see the delivery of some small sized buildings alongside medium and large development units.</i></b> The reference to large development to units is introducing a new planning policy and is therefore contrary to the remit of an SPD (2.2). Equally this statement does not reflect the earlier narrative about the open and sensitive nature and characteristics of the areas surrounding AL1 and AL2. <b>The statement should read ... <i>the delivery of some medium sized buildings alongside small development units.</i></b></p> <p>3.22 We agree that the northern gateway acts as a key arrival point into the historic settlement of Towcester, which needs to be reflected in the design quality, scale and massing of AL1 and AL2. <b>Caldecote, Duncote, Greens Norton and Tiffield are also important historic settlements that deserve the same level of design quality, scale and massing considerations</b> in relation to the AL1 and AL2 development sites.</p> <p><b>Small, Medium and Large Unit Sizes</b></p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>We welcome this section in principle since it is helpful to have an indication of what is meant by small, medium and large developments.</p> <p>We agree with the SPD's definition of small units i.e. 250m<sup>2</sup> to 2,500m<sup>2</sup>. However, <b>we disagree with the SPD's definition of medium sized units, which should be between 2,500m<sup>2</sup> and 5,000m<sup>2</sup> (not 8,000m<sup>2</sup>).</b> The SPD cites Tove Valley Park and Silverstone Park as local examples of medium sized buildings. <b>We reject entirely the inclusion of Swan Valley since this is not reflective of buildings appropriate in scale, form and character local to the Towcester area.</b></p> <p>We note the inclusion of large buildings for academic comparison but <b>we do not support development of large buildings since they are completely alien to the landscape surrounding Towcester and would be introducing a new planning policy</b>, contrary to the remit of the SPD.</p> <p>One of the major issues relating to the proposed developments on the edge of Towcester are the building heights, and the potential impact on surrounding areas. In fact under section 4 the SPD rightly looks in detail at the potential visual impact of each development site. As a consequence <b>we are very concerned that this section makes no mention of building heights</b>, especially as they relate to floor area. For instance the current planning application for the AL1 site proposes up to 24m ridge height. These are truly enormous building heights which are totally alien to this locality and dwarf any existing buildings in Towcester let alone its rural hinterland. <b>We strongly urge the SPD to adopt a maximum height of 10 metres across sites AL1 and AL2, and lower for AL4.</b></p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p><b>Landscape and Visual Consideration</b>  pp 43-55 We welcome the Sensitive Receptors, and in particular the Viewpoints 1-15 for AL1 &amp; AL2 and Viewpoints 1-12 for AL4, which illustrate the enormous impact inappropriate developments could have on Towcester and its surrounding rural areas. It is a pity that, so far as we are aware, the planning applications submitted to date have not attempted to assess the real visual impact of their schemes. <b>The SPD should make it a requirement that all future applications include visual impact assessments based on the Sensitive Receptor/Viewpoint locations as a minimum.</b></p> <p><b>Overarching Design Principles</b>  5.1 We understand why the SPD cannot be <i>overly prescriptive about design, allowing for a level of flexibility</i>. We agree, but would urge WNC to encourage prospective developers to be ambitious in their quality of design rather than rolling out their standard design pattern book with no regard to the importance, and opportunity, presented by development in this vicinity. Industrial buildings do not have to mean poor quality design. Towcester deserves much better than the mediocre designs so far submitted under planning applications.</p> <p>5.3. We support the 12 general design principles, but we have comments on some of them, and one additional bullet:  <b>Bullet 2 – this fails to recognise that development platforms are determined almost entirely by the size of building, especially on a sloping site.</b> For instance an 8,000m<sup>2</sup> building will require proportionately more cut and fill compared with a building half its size. As a consequence there is a far greater likelihood of a platform having to be built up from existing ground level, thereby causing a much greater visual impact.</p>		

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		<p><b>Bullet 7</b> – we support using <i>footpath, cycle and road networks to support and encourage sustainable travel to and around the site</i>. However, <b>this fails to take into account that the type of use will have a major impact on sustainable travel</b>. For instance distribution warehousing is likely to require a workforce well outside the Towcester area (especially when you consider the local socio-economic profile - 2.29) which completely undermines the case for sustainable transport. We were also extremely disappointed that the current AL1 planning application fails to provide a quality cycle and pedestrian route from Caldecote to the site and then on to Towcester. We feel that this is a real missed opportunity.</p> <p><b>Bullet 9</b> – we support the need for <i>new active building frontage and decorative planting...</i> However, this <b>active frontage needs to extend to the northern boundary of site AL1</b> since that is the boundary that will have the greatest impact on Caldecote.</p> <p><b>Bullet 12</b> – the <b>list of limiting the impact on tranquillity of each site's rural setting should also include operating times</b>, especially since the prevailing wind in the UK is from the south-west so in the case of AL1 noise pollution is more likely to be carried to residential areas.</p> <p><b>New Bullet - Provide evidence of cumulative impacts on the wider road network and key junctions/roundabouts as well as assessing the local impact of increased traffic arising from the development proposed.</b></p> <p><b>Site AL1 Development Framework</b>  6.21 We welcome the proposal for new substantial landscape edges/buffers, with tree planting along the northern, eastern and western perimeter. <b>The SPD should indicate a minimum depth for each of the buffers</b>. We could find no mention of bunding. Given the proposed building heights we <b>wish to see a</b></p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p><b>minimum bunding height of 7m (plus planting) along the northern boundary, or provision that the buildings are sunk so that their visual impact is minimised or removed.</b></p> <p>6.23 Since the siting of the TFC's pitches is not defined in policy we would far rather <b>the pitches were located along the northern boundary of the site so that they act as a buffer between Caldecote and the development site.</b> We would also question the sense of currently locating the sports pitches next to the very busy A43 dual carriageway with all the air pollution risks that brings to players and spectators.</p> <p>6.25 We are <b>very unhappy with an indicative building height of 16m. All buildings on the AL1 site should be a maximum of 10m in line with the maximum industrial building height in Towcester and with the framework for AL2.</b> Please remove the reference to large buildings for the reasons stated earlier in this response.</p> <p>6.26 We would like to see the <b>northern boundary also treated as a key frontage since it has considerable impact on Caldecote, the closest settlement to the AL1 development.</b> That said if the buffer/bunding outlined in 6.21 above is improved and the buildings hidden then this key frontage requirement would be superfluous.</p> <p><b>Site AL2 Development Framework</b></p> <p>6.47 We welcome the limit of building heights but <b>this should be capped at a maximum of 10 metres. This reinforces that the AL1 site should also be restricted to 10 metres.</b> We assume the reference to sensitive views refers to the view from Easton Neston to Greens Norton Church Spire. We consider that <b>this requirement should be strengthened by stating that this view should be maintained.</b> Again, please <b>remove the reference to large buildings</b> for the reasons stated earlier in this response.</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6.49 While we welcome the proposed key frontage for the A5 and Towcester Road frontage we believe that the <b>wording should be stronger</b>.</p> <p><b>Site AL4 Development Framework</b></p> <p>6.60 We are <b>very disappointed that the SPD makes very little reference to access to and from the AL4 site</b>. The site has good north-bound on and off access onto the A43, although there will still be major issues at the Abthorpe and Towcester roundabouts. However access south-bound on and off is completely compromised by lack of direct access to the A43, requiring all south-bound traffic to go through Silverstone village. The whole point of the A43 being dualled, and Silverstone village being by-passed, was to remove heavy traffic from the village. This strikes us as being a very retrograde step and will almost certainly lead to an increase in traffic through Silverstone and in adjoining areas such as Whittlebury. As referenced in 5.3 above <b>developers of the AL4 site need to provide evidence of cumulative impacts on the wider road network and key junctions/roundabouts as well as assessing the local impact of increased traffic arising from the development proposed</b>.</p> <p>6.65 We consider that <b>the maximum development height for AL4 should be 7 meters</b>, not the 10-15 metres referenced. This is due to the local topography and the site's position in open countryside on rising land away from it to Whittlebury in particular. Capping at this height will help to limit the site's impact on Silverstone village, nearby Whittlebury (probably even more directly affected by the visual impact of the development) and Abthorpe. Linked to this, and because of the sweeping topography in the area, <b>we also think that there</b></p>		

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		<p><b>need to be more sensitivity receptors, for instance from Abthorpe (not shown on the map).</b>  We further consider that <b>the maximum unit size for this development, given the access difficulties and other constraints, should be the existing development (1200m2) and Silverstone Fields (2,500m2).</b> We understand that the justification for AL4 was linked to the technology opportunities presented by its proximity to Silverstone circuit. If that is the case then we fail to understand the need for warehousing, for which there is little or no demand from this type of highly advanced manufacturing. If indeed warehousing is needed to facilitate businesses at the Circuit then it should be located next to the circuit itself.</p> <p>6.66 please <b>remove this section and in particular the reference to large buildings</b> for the reasons stated earlier in this response.</p> <p><b>Exemplar Development</b>  We welcome this entire section since it exemplifies that approach that should be adopted by all new major developments. We would urge that WNC encourages developers to adopt these four key requirements from the outset as a key driver for their development rather than as an after-thought.</p> <table border="0" data-bbox="551 1114 1375 1393"> <thead> <tr> <th data-bbox="551 1114 1010 1214"><b>Appendix A – Labour Market Assessment Data for South Northants vs West Northants LMI Category</b></th> <th data-bbox="1048 1114 1122 1137"><b>SNPC</b></th> <th data-bbox="1211 1114 1267 1137"><b>WNC</b></th> <th colspan="2"></th> </tr> <tr> <th data-bbox="551 1222 584 1246"><b>No.</b></th> <th data-bbox="1048 1222 1070 1246"><b>%</b></th> <th data-bbox="1211 1222 1245 1246"><b>No.</b></th> <th colspan="2"></th> </tr> </thead> <tbody> <tr> <td data-bbox="551 1254 730 1278">Population (16-64)</td> <td data-bbox="1048 1254 1122 1278">73700</td> <td data-bbox="1211 1254 1290 1278">406700</td> <td colspan="2"></td> </tr> <tr> <td data-bbox="551 1310 741 1334">Economically active</td> <td data-bbox="1048 1310 1122 1334">64500</td> <td data-bbox="1144 1310 1200 1334">83.1</td> <td data-bbox="1211 1310 1290 1334">204800</td> <td data-bbox="1312 1310 1357 1334">79.7</td> </tr> <tr> <td data-bbox="551 1366 674 1390">Unemployed</td> <td colspan="2"></td> <td colspan="2" data-bbox="1211 1366 1375 1390">Estimate not available</td> </tr> </tbody> </table>	<b>Appendix A – Labour Market Assessment Data for South Northants vs West Northants LMI Category</b>	<b>SNPC</b>	<b>WNC</b>			<b>No.</b>	<b>%</b>	<b>No.</b>			Population (16-64)	73700	406700			Economically active	64500	83.1	204800	79.7	Unemployed			Estimate not available			
<b>Appendix A – Labour Market Assessment Data for South Northants vs West Northants LMI Category</b>	<b>SNPC</b>	<b>WNC</b>																											
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		Economically inactive	12700	16.9	50600	20.3	Jan 2021 to Dec 2021	
		Employment by occupation	Jan 2021 to Dec 2021					
		Soc 2010 Major Group 1-3						
		1 Managers, directors, senior officials	8900	14.0	22200		11.4	
		2 Professional occupations	14700	23.0	34500		17.7	
		3 Associate, professional & technical	9200	14.4	26500		13.6	
		Soc 2010 Major Group 4-5						
		4 Administrative & Secretarial	5400	8.4	19100		9.8	
		5 Skilled trades occupations	7100	11.1	21700		11.2	
		Soc 2010 Major Group 6-7						
		6 Caring, Leisure And Other Service Occupations	5100	8.0	16100		8.3	
		7 Sales And Customer Service Occupations	3800	6.0	13100		6.7	
		Soc 2010 Major Group 8-9						
		8 Process Plant & Machine Operatives	14000	7.2			SNPC sample size too small	
		9 Elementary occupations	7000	11.0	27600		14.2	
		Qualifications	Jan 2021 to Dec 2021					
		NVQ 4 and above	32600	43.2	75100		30.3	
		NVQ 3 and above	50400	66.8	132900		53.5	
		NVQ 2 and above	66700	88.4	187100		75.3	
		NVQ 1 and above	72300	95.7	219800		88.5	
		Other	15400	6.2			SNPC sample size too small	
		None	13100	5.3			SNPC sample size too small	
		Earnings by place of residence (Gross weekly pay FT £)	665.2	598.8			2021	
		Earnings by place of work (Gross weekly pay FT £)	607.4	573.6			2021	
		Employee Jobs	2020					
		Manufacturing	3500	5.3	17000		8.2	
		Transport and storage	12000	18.2	27000		13.0	
		Information and communication	3000	4.5	7000		3.4	
		Financial and insurance	5000	7.6	9000		4.3	
		Professional, scientific & technical	6000	9.1	15000		7.2	
		Enterprises						
		Mico (0-9)	6109	90.4	19220		90.2	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action															
		<table border="0"> <tr> <td>Small (10-49)</td> <td>505</td> <td>7.5</td> <td>1725</td> </tr> <tr> <td>Medium (50-249)</td> <td>110</td> <td>1.6</td> <td>290</td> </tr> <tr> <td>Large (250+)</td> <td>30</td> <td>0.4</td> <td>75</td> </tr> </table>	Small (10-49)	505	7.5	1725	Medium (50-249)	110	1.6	290	Large (250+)	30	0.4	75	<table border="0"> <tr> <td>8.1</td> </tr> <tr> <td>1.4</td> </tr> <tr> <td>0.4</td> </tr> </table>	8.1	1.4	0.4	
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SPD098	M Bailey	<p>We welcome the introduction of a Supplementary Planning Document (SPD) for the development sites AL1, 2, 4 and 5. The saga of the Local Plan, and especially its consultation process, has been a sorry tale indeed and the SPD will go some way to mitigating the major errors made by the Local Plan. We are only sorry that AL3 is excluded from the SPD and, as a result, Towcester and its hinterland will be saddled with a completely inappropriate development that future generations will have to live with. Of utmost importance is that the wording across the document needs to be much tighter. At present the SPD is littered with 'may', 'should', 'seek to', 'where possible', 'explore', 'look to', 'could', etc. The purpose of the SPD is to reduce uncertainty and provide clear guidance to landowners, developers, planners and the local community. Tightening the wording is therefore crucial to all parties, particularly as, it seems, DEVELOPERS HAVE TAKEN ADVANTAGE OF LOOPHOLES IN THE ORIGINAL LOCAL PLAN (2) that was voted through in July 2020 to put forward planning applications for warehousing round Towcester and in very much larger units than we all envisaged when consulted about land for small and medium enterprises. THIS SHOULD NOT HAVE BEEN ALLOWED TO HAPPEN and it imperative that this is recognised and firmly dealt with.</p> <p><b>South Northamptonshire's Economic Growth Strategy 2.6 and 2.22</b> You rightly describe the roles set out in the Part 2 Local Plan as very clear to ensure they meet local demand. We agree and suggest that the <b>SPD needs to reinforce the importance of developments needing to meet all the tests</b> namely: Meet local demand and strengthen the rural economy;</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications</p>															

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		<p>Provide the ability to strengthen local supply chains; Local flexibility and choice of locations; Meet the demand for small and medium sized units; and contribute to reducing the level of out-commuting. Our main concerns are: 1. <b>TRAFFIC</b> – A cumulative Traffic study and assessment must be carried out to cover ALL the sites We know how congested the Tove/Abthorpe roundabouts become, as well as the centre of Towcester, and that our villages are used as rat-runs. National Highways and West Northants Highways have repeatedly ducked this key issue. WE are concerned about HGVs using the A413 through Silverstone and increased rat running through Whittlebury. We need <b>ACCURATE/CONSISTENT TRAFFIC ANALYSIS.</b></p> <p>1. <b>FOOTPRINTS</b>– The original Local Plan was intended for small and medium sized units only. Keep it to that with no building exceeding 5,000m<sup>2</sup>, which is precedent for this area. For comparison the largest units at Silverstone Circuit are 5,000m<sup>2</sup>. The SPD suggests that units over 8,000m<sup>2</sup> could be built on all sites 'in exceptional circumstances. We need to have this option removed. <b>MAXIMUM FOOTPRINT FOR MEDIUM UNITS 5,000m<sup>2</sup> AND NO LARGE UNITS.</b></p> <p>1. <b>HEIGHTS</b> – the SPD allows for buildings on AL4 up to 15m high which is much too high for a site with wide visual impact; AL1 “rising to 16m” – which is too high (especially if they are built on raised platforms adding up to 7m); AL2 up to 12m in height. All these are much taller than any other existing building in the area – NB Screwfix is 9.5m high. <b>KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M.</b></p>	<p>into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		We trust our concerns will receive serious consideration.		
SPD099	Cllr M Cubley	<p>Thank you very much for listening to residents and drafting the Supplementary Planning Guidance, as it was disappointing that following the adoption of the Local Plan Part 2 that Council Officers (Planners) engaged with developers on large scale developments when the local plan clearly set out that the employment sites were targeted for small to medium business . Towcester is an historic market town supporting rural communities and must never be allowed to become a logistics hub or home to any large developments to diminish its historic stature of a rural roman town and being a place sought after by people to live.</p> <p>I have seen the very detailed report of Cllr Ian McCord, with which I am in agreement with.</p> <p>I would make the following additional points which need addressing in the SPG to ensure that there can be no confusion as to its intention:</p> <ol style="list-style-type: none"> <li>1. The A5 is continually gridlocked or at a standstill and air quality is poor with residents being advised to keep windows closed. It is not sufficient for traffic assessments to be carried out for each development utilising a variety of data models/sources. A cumulative traffic assessment should be carried out to cover all AL sites from Pattishall, in the north to the Stony Stratford roundabout in the south and from the M1 east to Silverstone in the west. At the present time each developer is utilising different data sets/models having never visited Towcester which is inaccurate. The A5 cannot cope with any further traffic. The relief road is being built for the benefit of local residents and not corporate companies.</li> </ol>	<p>Planning applications can be submitted by any applicant at any point in time.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>The wording relating to frontages onto the A5 and Towcester Road has been strengthened.</p> <p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<ol style="list-style-type: none"> <li>2. On every planning application detailed information should be given by Developers as to the employment opportunities their development would bring to Towcester residents and those in surrounds villages and for confirmation that the employment is for semi/skilled workers.</li> <li>3. The local plan clearly states small to medium sized units. Therefore, the SPG are should clearly state that no building will be allowed exceeding 5,000m and there should be no allowance for exceptional buildings over 8,000. From a height perspective no building should be visible above the tree line or over the height of any existing building. The maximum to be allowed in Towcester should be 10 meters.</li> <li>4. Swan Valley has no bearing on Towcester s an historic market town and this reference should not be used as a precedent.</li> <li>5. 5. It should be clarified that it will not be permissible for smaller buildings to be joined up to make larger ones in due course.</li> <li>6. Any development must be screened by trees large enough to ensure buildings are not visible from the road or on entry to Towcester.</li> </ol>		
SPD100	T Palacio	Having studied the South Northants Supplementary Planning Guidance Document (SPD) and attended the Drop-in session at The Forum on 13th July 2022 I make the following comments which I believe provide a reasonable expectation for our historic and beautiful town.	The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.	The SPD will be amended to confirm that the heights are

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		<p>Whilst these are generic based on the stance of the Save Towcester Now group, of which I am a member, I wholeheartedly agree with them, as does my wife, and indeed raised these very issues at the aforesaid Drop-in session.</p> <p>1. A cumulative TRAFFIC study and assessment must be carried out to cover ALL the sites – AL1-4. We know how congested the Tove/Abthorpe roundabouts become, as well as the centre of Towcester, and that our villages are used as rat-runs. National Highways and West Northants Highways have repeatedly ducked this key issue. We do not have the road infrastructure to cope with developments of this type. We need ACCURATE/CONSISTENT TRAFFIC ANALYSIS.</p> <p>2. FOOTPRINTS– MAXIMUM FOOTPRINT FOR MEDIUM UNITS 5,000m2AND NO LARGE UNITS.</p> <p>The original Local Plan was intended for small and medium sized units. Keep it to that with no building exceeding 5,000m2, which is the precedent for this area. For comparison the largest units at Silverstone Circuit are 5,000m2. The SPD suggests that units over 8,000 m2 could be built on all the sites “in exceptional circumstances”. We need to have this option and ambiguity removed.</p> <p>3. HEIGHTS – KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M.</p> <p>The SPD allows for buildings on AL1 “rising to 16m” – which is too high (it is not clear whether this still allows platforms adding up to 7m); AL2’s buildings up to 12m in height and on AL4’s up to 15m high. All these are much taller than any other existing building in the area – NB Screwfix is 9.5m high. They’ll be seen for miles and will have a negative visual impact on our area.</p> <p>Finally: The existing employment space in Towcester has gradually developed over the last 30 years. Large scale, high</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to</p>	<p>indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>



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		<p>bay logistics hubs of the sort proposed by DHL will be built and operational within 3 years. Therefore 30 years' worth of development in less than 3 years. It makes no sense. I hope these reasonable changes can be made to the current plans</p>	<p>be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	
SPD10 1	S Parkinson	<p>Along with the Pattishall Parish Council I fully support the purpose of the SPD to “reduce uncertainty” and provide “clear guidance” on what is expected from future developments. I note from paragraph 1.20 that the Part 2 Local Plan requires Health Impact assessments. However there is a lack of clarity in the document about what kind of health impact assessments are required. One important aspect of health and wellbeing for the areas around the four sites is the use of minor roads for recreational purposes such as walking, cycling and horse riding. Paragraphs 5.2 and 5.3.2 should be amended to read as follows:</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. This should also cover opportunities for sustainable transport such as walking and cycling.</p>	

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		<p>5.2 These principles must be reflected in any development proposed for the four employment sites. No justification will be accepted for any development proposal that does not fulfil these general design principles.</p> <p>5.3 New development for all of the four allocated employment sites will:</p> <ol style="list-style-type: none"> <li>1. Support Local Plan policy to deliver high quality small and medium scale development that is respectful of its setting within the boundaries of the allocation sites.</li> <li>2. Provide evidence of cumulative impacts on the wider road network and key junctions/roundabouts as well as assessing the local impact of increased traffic arising from the development proposed. Evidence predicting diversion of trunk road traffic onto minor country roads will be unacceptable. The health and wellbeing value of minor rural roads for recreational use is a valuable resource which must be preserved.</li> </ol>		
SPD10 2	P Higgins	<p><b>Employment</b> We consider that the SPD <b><i>needs to reinforce that the aim of the Local Plan is to attract new investment and provide more jobs to match the skills of local people.</i></b></p> <ul style="list-style-type: none"> <li>• You rightly point out that South Northants' skills and educational attainment are significantly above those of the East Midlands (and West Northants). A Quality of Life Survey shows that South Northants is a prosperous area with a highly skilled workforce, one of the lowest unemployment rates, higher than average number of residents employed in managerial, professional and skilled occupations. Unfortunately this data appears to have been ignored by DHL. They commissioned Savills in February this year to carry out a labour market assessment which claimed that local skills and educational attainment were worse than the regional average. This painted a completely misleading picture of local skills and</li> </ul>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites and therefore the local skills and educational attainment will need to be considered via the planning application process.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>educational attainment since it was based on West Northants data.</p> <ul style="list-style-type: none"> <li>• One of the aims of the SPD is to reduce out-commuting to work, yet the workforce for these warehousing sites will have to be found from outside the area of Towcester (Daventry, Northampton etc.), thus increasing the numbers of people on the roads travelling to work.</li> <li>• Local skills means meeting the needs of Towcester and South Northants where skills and education attainment are significantly higher than those of West Northants and the region, otherwise there is a real risk of lowering rather than raising aspirations. Developers need to demonstrate how their development will meet local skills requirements. They need to set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on types of jobs.</li> </ul> <p><b>Traffic</b></p> <ul style="list-style-type: none"> <li>• Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3 (which already has planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it</li> </ul>	<p>consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with</p>	<p>shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>has no southbound access into the A43, meaning all vehicles travelling south will pass directly through Silverstone village or Whittlebury.</p> <ul style="list-style-type: none"> <li>• The numbers of people travelling from West Northants to South Northants for employment at the warehouse sites needs to be added to this traffic Impact data.</li> </ul> <p><b>Area and Heights of proposed buildings</b></p> <ul style="list-style-type: none"> <li>• The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site.</li> <li>• Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn. and should not be used as a precedent.</li> <li>• The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be defined and specific – it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location. The existing development at Bell Plantation would be a good example of this.</li> <li>• No building to be taller than any existing building on a nearby site i.e. for AL1 and AL2 this is site 4 (on page 28 of the SPD) and for AL4 this is site 6/Silverstone Business Park/Shacks Barn (on page 30 of the SPD).</li> </ul>	<p>the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	

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		<ul style="list-style-type: none"> <li>• The control of the maximum ridge height of buildings on AL1 and AL2 should be 10 metres, whereas the maximum ridge height for the buildings at AL4 should be 7 metres. This is because of its rural location and position on the Whittlewood Ridge which lends to far reaching visibility of the site. That is the precedent for the local area and would fit with the intent of the Local Plan (2) for small and medium sized units.</li>   <li>• The maximum unit size for AL4, given the access difficulties and other constraints, should be the existing development (1200m2) and Silverstone Fields (2,500m2). We understand that the justification for AL4 was linked to the technology opportunities presented by its proximity to Silverstone circuit. If that is the case then we fail to understand the need for warehousing, for which there is little or no demand from this type of highly advanced manufacturing. If indeed warehousing is needed to facilitate businesses at the Circuit then it should be located next to the circuit itself.</li>   <li>• It should be clarified that smaller/medium buildings cannot be joined up at later dates to form larger units.</li>   <li>• Screening using trees must be large scale, not planted with the possibility of full screening only after 15 years. Further, maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of mounds is unacceptable screening.</li>   <li>• The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. This is of particular importance</li> </ul>		

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		<p>for AL4, where the developer has already attempted to increase the development site area by 28% through placing the drainage ponds outside of the allocated land area.</p> <ul style="list-style-type: none"> <li>• I also object to these business/warehouse sites being called 'employment sites'. As it is well known that warehousing offers few low level jobs and it may be confusing for people to think that these sites are concerned with finding general employment possibilities in the vicinity.</li> </ul>		
SPD103	K Cooper	<p>I am a resident in Silverstone and I am writing about my concerns over the developments in the local area, particularly at Shacks Barn and the impact they will have on traffic. Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed and once AL3 (which already has planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no southbound access onto the A43, meaning all vehicles travelling south will pass directly through Silverstone village and past the new primary school or through Whittlebury.</p> <p>The Local Plan 2 allocated these local development sites for small and medium sized units. The SPD has added large units and defines them as 8,000sqm with no limit - this is clearly both unacceptable and outside of the remit of the Supplementary PLanning Documents. 5,000sqm is the maximum acceptable</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. and 'Landscape &amp; Visual</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>footprint on any site and is well evidenced as the local precedent.</p> <p>The SPD has introduced specific building heights. At Shacks Barn this is up to 15m high when the existing highest building locally is 9.5m. The visual impact cannot be hidden by planting and the illuminated buildings will be visible for miles next to rural villages. A maximum ridge height of 10m is more appropriate.</p> <p>I hope the response from the local community will help protect our region from the scale of these developments and ensure appropriate levels of traffic can be maintained on our roads.</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The document reiterates the need for further assessment work to be undertaken by applicants, particularly in relation to doing a thorough landscape and visual assessment. This is stated at the start of the 'Assessment &amp; Evaluation'</p>	<p>Consideration' sections. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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SPD104	M Hockley	<p>I wish to make it known that as our representatives the planning committee and others should not go ahead with AL1, AL2, AL4 and AL5.</p> <p>My immediate concerns are, Traffic volumes.</p> <p>Has any representative actually got a grasp on the local traffic situation? Already there are severe problems when accessing any facilities from / on the A5 for local residents. As for "guiding" traffic away from the A5 I am sure you all know that will not work, so why lie about it?</p> <p>Employment. I estimate that the amount of staff working will be in excess of 1500, where will they come from? So we assume they are going to be bussed in, they cannot afford transport costs via own vehicles being paid approx £400 p.w. either way more traffic or are the buildings to become oversized white elephants? To expect local people to take up the jobs where will they live? No social housing available and earning £21 / 25k is not going to buy a house in this area.</p> <p>Blot on the landscape. Do we really need more sheds in what is fast becoming known as "shed valley" stretching from Luton along the M1 as far as the M6 and beyond. Other counties get modern tech valleys not West Northants we get the leftover warehouse valley, aim higher for the sake of LOCAL PEOPLE . I could keep writing but I guess this e mail has been deleted by now</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>



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			heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.	
SPD10 5	M Black	<p>Letter attached against AL1 planning application. Letter has been redacted owing to GDPR.</p> <p>In reference to previous letters I sent Daniel Callis and Jim Newton regarding the DHL proposal for an Enormous Logistic Super Hub shown by the red arrow in the images below.</p> <p>I thought I would give you some background from my position being to the proposed development. Obviously, I am shocked at the size of this development considering the</p> <p>. I do not want to go over old ground with regards to the lack of communication from both the Council and DHL and that fact that until this year the proposed development was very much under the radar to most of the local residents.</p>	As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.	No changes necessary.
SPD10 6	R Paice (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: I think these design principles do not target the type of employment required by the residents of the town nor constrain</p>	The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation	The SPD will be amended to confirm that the heights are indicative

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>the type of buildings required for the Towcester. The plan refers to maintaining the rural nature of the area which the current proposed developments are driving a "bulldozer" through.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Please provide comments to support your answer: No consideration was given to the size of the massive buildings concerned no the effect these massive warehouses at AL1 will have on the already challenged road system</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p> <p>Please provide comments to support your answer: They are oaky but are insufficient to prevent the development of warehousing that is almost half the size of the town itself.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: No, already the land is being cleared under the pretence of archaeological work. You do not use the size of machinery to clear an entire field those guys are using to do delicate work required to examine the site. On social media many expressed concern about this work and when the council was challenged</p>	<p>implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 has been through a formal local plan preparation process.</p>	<p>and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>to visit the site (why hadn't they already) they took the word of the workers on site this was only archaeological. If the council can't constrain pre final approval work I do not believe the Site Development Framework will be successful.</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes</p> <p>Please provide comments to support your answer: With reservations on this smaller site yes, we do need some development.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>Please provide comments to support your answer: The lower size of the developers and location means they have less opportunity to bulldozer expansion</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Yes</p> <p>Please provide comments to support your answer: Same as AL2</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Yes</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: Same as AL2</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Not Answered Please provide comments to support your answer: NO view</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: Now view</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p> <p>Only that I hope this disastrous SNC local plan can be rewritten by West Northants Council with a mind to appropriate development and not the ruination of one of the oldest rural areas in the country</p>		
SPD10 7	L Brooks (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations,</p>	<p>No changes necessary.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Please provide comments to support your answer: I would prefer to see a higher concentration of small and medium units rather than large ones.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>Please provide comments to support your answer: There needs to be a slip road onto the A43 from this site.</p>	<p>meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: There needs to be a slip road onto the A43 from this site.</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Yes</p> <p>Please provide comments to support your answer:</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Yes</p>		
SPD108	T Leeming (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes</p> <p>Please provide comments to support your answer: More sensible size buildings and heights proposed in the SPD v's the DHL proposals. More reflective of the market, situation and demand in a small market town.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p> <p>Please provide comments to support your answer:</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>It clearly defines the size bands with the largest units rightly by motorway junctions.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Yes</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Yes</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: The scale of development should be reflective of the situation. The proposed DHL warehouse is too large and high in scale for the market town and rural setting. A smaller medium scale development would be more appropriate. The key consideration is highways and capacity on an already very busy network.</p>		
SPD109	A Smith (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: The SPD doesn't appear to consider existing residential properties in the region of AL5. In the area known as Furtho Pit, Old Stratford Parish, existing medium sized unit sets a precedent along with with previous application to locate ACE Plant on the land between Cosgrove Road and A508. This area is obscured from Old Stratford and has less impact on residents.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p>	<p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. The Local Plan Part 2 has been through a local plan preparation process. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application</p>	A glossary is to be added.



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p> <p>Please provide comments to support your answer: AL1 is less of a concern for Cosgrove.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL1 is less of a concern for Cosgrove.</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>Please provide comments to support your answer: AL2 is less of a concern for Cosgrove.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL2 is less of a concern for Cosgrove.</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p>	<p>stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: AL4 is less of a concern for Cosgrove.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL4 is less of a concern for Cosgrove.</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: AL5 was accepted as a development site by SNC, but without any consultation of residents that are greatly affected by any development in this area.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Development in this area has the potential to destroy a village that suffers greatly from a massive increase in population and traffic during the summer months, with no alternative access to Cosgrove Park.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The road infrastructure in this area is barely adequate for today's traffic, with congestion at the Old Stratford roundabout a major concern.</p> <p>With issues experienced where the M1 has been closed, the affect on this area has to be considered before any additional logistic operations is allowed to opearte from the area..</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>AL5 was sanctioned by SNC, while only stating the area as Furtho Pit, which is in Old Stratford Parish. The inclusion of land in Cosgrove Parish was introduced without any supporting communication to make it clear that the proposed area had increased dramatically and will impact on residents.</p> <p>Consider better communication with Parish Councils and residents who live in the vicinity of AL5. The welfare of people must be a high consideration and from the conversations I have with people who reside in this area, the fear of what may be is having a detrimental affect on their health and well being.</p> <p>Keeping people better informed and using language that people understand must be a high priority.</p>		
SPD110	W Smith (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>The SPD has no regard for the residential properties that are situated on its doorstep around AL5 the areas known as Furto pit in Old stratford has some small units and one medium size unit whhich sets a president for the area. The devlopment as it was agreed was never on the understanding that it would be for large units and was set for local small enterprise, the original</p>	<p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to mitigated to the satisfaction of the decision maker. This would include the caravan park where relevant.</p> <p>Any harm would need to be outweighed by benefits.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>application in the parish of old stratford was for ACE plant to move thier small business over to this side and this would have had little impact on the residents. as that was on the cosgrove side of old stratford it was supported by that PC due to its location. the inclusion of the land in Cosgrove along the stratford road was not visioned and the size of the units proposed go completely against the principlal in which the original authority from council was granted. I belive that small and medium units no larger than already placed should be permitted</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p> <p>Please provide comments to support your answer: Placing an idea of small medium and large is subjective AL5 is not sutible for large</p> <p>6 Do you agree with the constraints and oppportunities identified in respect of Site AL1? Not Answered</p> <p>Please provide comments to support your answer: AL1 is not a concern that I can make comment on</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer:</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>AL1 is not a concern that I can make comment on</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>Please provide comments to support your answer: AL2 is not a concern that I can make comment on</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL2 is not a concern that I can make comment on</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>Please provide comments to support your answer: AL4 is not a concern that I can make comment on</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL4 is not a concern that I can make comment on</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No</p> <p>Please provide comments to support your answer:  AL5 was accepted as permitted development without any consultation with residents, its parish council etc. the addition of the land that was referred to as further pit was not further pit and was added under the radar.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?  No</p> <p>Please provide comments to support your answer:</p> <p>This area is already on extreme pressure from traffic visiting the village to service the Caravan park and the canal, this development will destroy the lives of those that will be living on its door step, those that have invested their lives to live in open countryside. the traffic infrastructure can't cope with traffic that forms part of this proposal and the noise and light operation for both Cosgrove and Old stratford will have a detrimental effect on the health of those forced to live with it. where the motorway is closed this becomes the through route to Junction 16 and 14 and traffic coming from the other AL sites will only increase the demand on the A5 roundabout this will also become the route to the M40 through buckingham the whole traffic management needs to be looked at in the wider detail.</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>AL5 was sanctioned by SNC, while only stating the area as Furtho Pit, which is in Old Stratford Parish. The inclusion of land in Cosgrove Parish was introduced without any supporting communication to make it clear that the proposed area had increased dramatically and will impact on residents. Consider better communication with Parish Councils and residents who live in the vicinity of AL5. The welfare of people must be a high consideration and from the conversations I have with people who reside in this area, the fear of what may be is having a detrimental affect on their health and well being. Keeping people better informed and using language that people understand must be a high priority. someone is accountable for allowing this to become more than was originally agreed to which was Furtho pit not the land adjacent to stratford road Cosgrove.</p>		
SPD11 1	D Smith (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: The SPD doesn't appear to consider existing residential properties in the region of AL5. In the area known as Furtho Pit, Old Stratford Parish, existing medium sized unit sets a precedent along with with previous application to locate ACE Plant on the land between Cosgrove Road and A508. This area is obscured from Old Stratford and has less impact on residents. In the area that sits in Cosgrove Parish, business units located at Brook Farm indicate a precedent that is in keeping with a village.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to mitigated to the satisfaction of the decision maker. This will include impacts on Brook Farm business units where relevant.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	A glossary is to be added.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Yes</p> <p>Please provide comments to support your answer: Stating acceptability of size bands is sensible and should prevent developers attempting to propose unacceptable sized units.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p> <p>Please provide comments to support your answer: AL1 is less of a concern for Cosgrove.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL1 is less of a concern for Cosgrove.</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>Please provide comments to support your answer: AL1 is less of a concern for Cosgrove.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: AL1 is less of a concern for Cosgrove.</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>Please provide comments to support your answer: AL1 is less of a concern for Cosgrove.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL1 is less of a concern for Cosgrove.</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: AL5 was accepted as a development site by SNC, but without any consultation of residents that are greatly affected by any development in this area.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  Development in this area has the potential to destroy a village that suffers greatly from a massive increase in population and traffic during the summer months, with no alternative access to Cosgrove Park.  The road infrastructure in this area is barely adequate for today's traffic, with congestion at the Old Stratford roundabout a major concern.  With issues experienced where the M1 has been closed, the affect on this area has to be considered before any additional logistic operations is allowed to opearte from the area..</p> <p>14 Are there any other comments you wish to make which you have not already made?  Are there any other comments you wish to make which you haven't already made?:  AL5 was sanctioned by SNC, while only stating the area as Furtho Pit, which is in Old Stratford Parish. The inclusion of land in Cosgrove Parish was introduced without any supporting communication to make it clear that the proposed area had increased dramatically and will impact on residents.  Consider better communication with Parish Councils and residents who live in the vicinity of AL5. The welfare of people must be a high consideration and from the conversations I have with people who reside in this area, the fear of what may be is having a detrimental affect on their health and well being.  Keeping people better informed and using language that people understand must be a high priority.</p>		
SPD11 2	J Proctor (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?  Yes</p> <p>Please provide comments to support your answer:</p>	The SPD has been produced in an accessible format in an attempt to be as clear as possible for consultation purposes. The public consultation has also been structured to aid	A glossary will be added.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Yes but it's important and all plans are clearly shared with the Parish / Cosgrove community as early as possible. Not all residents have access to the internet / email and this needs to be considered.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p> <p>Please provide comments to support your answer: The area for this project must not have large units. I agree that small and a couple of medium units may have to be adopted but the local impact on our community will be affected. This impact needs to be as minimal as possible.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p>	<p>understanding including consultation drop in event, exhibition boards, opportunity to speak with officers. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Yes</p> <p>Please provide comments to support your answer: Yes but only with small and medium units. This will affect the local community and traffic conditions.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: Yes but as previously stated our local community needs to be impacted as little as possible. It's not a completely through route village.</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		consideration and clear publications on all future communications.		
SPD113	J Oliff (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes</p> <p>Please provide comments to support your answer: If they are followed. For instance - AL5 is a very rural community with no building more than 2 storeys. Are the new buildings to be limited in height? If not, then no amount of tree planting will disguise them, they will be an eyesore.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Please provide comments to support your answer: The AL5 site is far too big for its location. The village closest to it is Cosgrove which is a very small village.</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: It appears that site is for industrial/warehousing units. This will place enormous pressure on the local roads (which are already over-used especially in rush hours) It will affect not only the residents of Cosgrove but also those of Castlethorpe and Hanslope who use Yardley Road/Stratford Road to gain access to the A508. The employment opportunities for residents of these villages will be almost non-existent as the majority are of managerial grades with a fairly high population of retired.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p>	<p>The neighbouring authorities were involved at the local plan preparation stage.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No</p> <p>Please provide comments to support your answer: It is a rural community. Any large development is inappropriate</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: Where is the consideration of the effect of these proposals on the Milton Keynes villages which border South Northamptonshire? So far, there is no evidence of any.</p>		
SPD114	J Miller (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p> <p>Please provide comments to support your answer: I strongly believe that this development should not go ahead . Its very scale will have a detrimental effect on all our lives in terms of vastly increased traffic and pollution. quite apart from, being a visual blight.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: I do not believe that any building of this scale should be possible on this site</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Yes</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Yes</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p>	<p>development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Yes</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		
SPD11 5	Incomplete online response			
SPD11 6	Incomplete online response			
SPD11 7	A Pateman (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes</p> <p>Please provide comments to support your answer: Strengthen planning over local issues</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p> <p>Please provide comments to support your answer: Hoping that greater clarity is achieved when development is along all three sizes</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes</p> <p>Please provide comments to support your answer:</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Providing greater control is applied during application stages for AL1's</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer: As above</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No  Please provide comments to support your answer: Constraints should be made stronger to avoid developers finding loop holes</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No  Please provide comments to support your answer: As above</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Yes  Please provide comments to support your answer: Providing they adhered to</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>Please provide comments to support your answer: As above</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: All constraints and opportunities must be applied to each and every AL5, if not developers will take advantage of any lax in application</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: As above</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: A much stronger approach must be made when applications for AL5's are applied for otherwise we will get the same result as is currently being see at the Furtho Pit Development Old Stratford.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD118	Incomplete online response			
SPD119	Incomplete online response			
SPD120	C Hockley (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p> <p>Please provide comments to support your answer: Not a 'methodology' - just a 'method' !!</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes</p> <p>Please provide comments to support your answer:</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p> <p>Yes</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?</p> <p>Yes</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>Yes</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p> <p>Yes</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>Yes</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p> <p>The overall approach and design etc., all look fine. What is missing is the evidence that all this employment development is NEEDED. There are no statistics to show that these proposals are :</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>"generating development to meet localised employment needs. Meeting local demand and strengthen the rural economy;</p> <ul style="list-style-type: none"> <li>• Provide the ability to strengthen local supply chains;</li> <li>• Local flexibility and choice of locations;</li> <li>• Meet the demand for small and medium sized units; and</li> <li>• Contribute to reducing the level of out commuting</li> </ul> <p>Nowhere in any of the proposals are figures to show that there is local need in any of these locations.</p> <p>The size of the proposals would mean that to fill the employment vacancies would need to import staff from elsewhere. This would then generate a need for more domestic dwellings to house them.</p> <p>So more and more of the 'green and pleasant land' that is South Northants will be buried under concrete</p>		
SPD12 1	M Whiteley (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes</p>	The need to allow for parking spaces for people with disabilities will need to be met in line with the Council's parking and accessibility guidelines. Disability standards will need to be met as part of any planning applications.	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Yes</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Yes</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		At all four new employment allocations, I would like to see a wide range of work opportunities for people with disabilities. I would also like to see parking spaces for drivers with disabilities, cycle parks for cyclists with disabilities, and accessible footpaths for people with disabilities.		
SPD12 2	Incomplete online response			
SPD12 3	R Duxbury Banbury Town Council (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Not Answered</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p> <p>Please provide comments to support your answer: NO OBJECTIONS RAISED</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p>	Comments noted.	No changes necessary.



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: No objections raised</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>Please provide comments to support your answer: No objections raised</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Not Answered</p> <p>Please provide comments to support your answer: No objections raised</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Not Answered</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>14 Are there any other comments you wish to make which you have not already made?            Are there any other comments you wish to make which you haven't already made?:            Thank you for consulting us an adjoining authority</p>		
SPD12 4	E Darby (Online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?            No</p> <p>Please provide comments to support your answer:            Not enough detail</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?            No</p> <p>Please provide comments to support your answer:            Inappropriate planning</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?            No</p> <p>Please provide comments to support your answer:            Not sufficient planning</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?            No</p> <p>Please provide comments to support your answer:</p>	The design principle that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.	Appropriate imagery to be included.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not an appropriate site from a single carriageway trunk road</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>Please provide comments to support your answer: Access to A5?...</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Not sufficient plans</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>Please provide comments to support your answer: Access?</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Not enough planning</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered</p> <p>Please provide comments to support your answer: N/A</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: As above</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: What provisions are in place for ecological ideals. Solar panels, top water /rain water conservation</p>		
SPD12 5	S Bonner	<p>I have been a resident of Cosgrove since 1991 and this development will impact on the environment as it is green land not brown! An area of brown land would be much better for building warehouse and industrial units as it wouldn't impact wild life of the whole area. Also the roads around the Old Stratford roundabout can't cope with the existing traffic so putting even more especially big lorries would cause danger as it would be 24/7 as it's to be large vehicles day and night. The whole area proposed will impact on trees and over all green open areas to the detriment of local residents with noise, disturbance and smells!</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029)The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. Additional wording has been added to the SPD to ensure that issues</p>	<p>Additional wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			such as noise and light are considered as part of the planning application process.	application process.
SDP12 6	J Dineen	<p>I would like to register my objections to the proposed developments round Towcester and Tiffield. My objections arise from a view that these developments are not viable from either operational or aesthetic reasons. My objections arise from a deep knowledge of logistics operations arising from 38 years experience in the industry and not a NIMBY approach.</p> <p>1. Employment offering. At present there are around 175 people registered in the area as available for employment. the DHL development alone states 1200 jobs. there is obviously a serious shortfall of available labour in the area. This will inevitably result in agency and other remotely resourced labour being driven into the area. For example Clipper and Yusen at J15 Grange Park are bringing in staff from a radius of 80 miles daily. This adds to congestion and pollution. Our local skills base is more suited to engineering and research and development. Highly qualified professional skills and not the 'under achievers' as so inaccurately reported in the recent employment survey.</p> <p>2. The local plan labour survey commented that the development would encourage reducing 'out commuting'. If the aspiration is to encourage local people to change jobs to eliminate this commuting then this is a naive assumption. e.g. My neighbour is an airline pilot. I hardly see him swapping that for a reach truck driver role. The developments need to match the local profile.</p> <p>3. The planned warehouse development should be made to fit with local appearances and not be allowed to go higher than</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment. The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	The wording relating to frontages onto the A5 and Towcester Road has been strengthened.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>those buildings currently in place. This is in keeping with the original plans.</p> <p>4. I met with the DHL Vice President of Property Acquisitions some time ago. He admitted to me that DHL had been slow off the mark when it came to acquiring the properties along the M1. When asked why they did not go to J18 DIRFT he was vague with this answer. From an operational point of view adding 20 miles onto the journey from the M1 and back this does not square with DHL's environmental credentials.</p> <p>5. Traffic. An outbound traffic increase of 8% from DHL is projected to go through Towcester town centre. This does not take into account any increase in inbound supplier traffic. This is wholly unacceptable from an environmental perspective (noise and pollution). Further damage to the buildings along Watling street. The council advised local residents a couple of years ago to close windows due to the levels of pollution along the narrow part of Watling street. Any increase in traffic, both inbound and outbound, will increase an already dangerous levels of pollution.</p> <p>6. Housing. There is an assumption of 'build it and they will come'. Average warehouse salary circa £25,000 pa. Average house price in the local area - £380,000. There is no way that the average warehouse person or HGV driver can afford housing in the area. There is also not enough social housing available or even planned to be built to satisfy the labour demand. This will inevitably lead to an influx of mobile labour. As stated earlier, I have had 38 years experience in the Logistics industry. Eighteen of them with DHL. This development has been ill thought out, a knee-jerk decision due to their lack of planning when it came to getting land adjacent to the M1. There will be further challenges around noise and light pollution generated from this development. It was interesting</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	

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		(and worrying) that in my discussions with various DHL personnel that they could not fully justify this development as many of my knowledge related questions could not be answered. I hope the council will take my points into consideration and actually allow any development to be suitable for the local area.		
SPD12 7	C Trotter	<p>I am grateful for the submission of the SPD in relation to the greatly flawed South Northamptonshire Local Plan Part 2 re. AL1, 2 &amp; 4 prepared by Barton Willmore and I support all the comments made in the representation of Save Towcester Now. My primary comment is that much of the document is open to reinterpretation/misinterpretation and should be tightened up to ensure there is no misunderstanding of the development framework as mentioned in the <b>Barton Willmore SPD on page 68 - Purpose of the SPD 1.13 "To provide a robust &amp; clear development framework with clear, specific development principles to inform the preparation and determination of planning applications."</b></p> <p>My further comments are as follows:</p> <p>1. It must be considered at all times that Towcester is an historic market town with Roman origins and this <b>MUST</b> be considered when any potential development is under scrutiny. This should be reflected in the height of the buildings (up to 10m, a precedent set by Screw Fix just north of Towcester town centre) and design (at no point should the proposed buildings under consideration be 'in contrast' to the surrounding rural landscape). <b>See page 62 of SPD, 5.3 Support Local Plan Policy "To deliver high quality development that is respectful of its setting"</b>.</p> <p>2. Although I support the important ideal of providing 'local jobs for local people', I fail to see how this will be the case should the proposed developments of gargantuan logistics hubs</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>suitable for robotic working be the outcome of the approved applications. It is a proven fact that Towcester and the surrounding villages have more or less full employment of the population of highly skilled workers to the extent that much of the available local work-force out-commute. There is little 'affordable housing' within a 10 mile radius. Distribution warehousing will require largely unskilled labour resulting in long distance commuting into the sites, little requirement for cycle/pedestrian routes as the workers will either drive themselves or require busing in, contributing greatly to the already dysfunctional arterial A43/A5 routes and the already high levels of local pollution.</p> <p>3. As per the Local Plan Part 2, the proposed Employment sites AL1, 2 and 4, should be small or medium sized and the maximum size must be stipulated as not exceeding 5,000sqm. Large units (at the current definition of over 5,000sqm) are not acceptable if the requirement to preserve the "rural character" of the area is to be upheld. Units of this size should be located alongside motorways as is the case with Swan Valley &amp; Panettone Park being 'strategic developments'.</p> <p>4. Above all else and this should be added to the final SPD, each proposed development MUST include a CUMULATIVE traffic survey which covers not only the effects of AL1 - 4 but also the ongoing developments within a 20 mile radius thus including all the strategic developments of the M1 corridor. Vehicles wanting to travel east to west from anywhere between M25 and M6 will use the already heavily congested &amp; dysfunctional A43 having an unacceptable impact on Towcester and the surrounding villages which become gridlocked regularly even now.</p> <p>Finally! A great deal of time, effort and public money has been spent on producing this draft document, it is imperative that no</p>	<p>development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>further planning applications can be submitted, including AL1, AL2, AL4 and any future further development of AL3, until this policy is in place and has influence over these proposed developments, otherwise, this has been a total waste of public resources.</p> <p>Thank you for your time in considering my comments above.</p>		
SPD12 8	Old Stratford Parish Council	<p>In addition to the support for Cllr Ian McCords response dated 30 July 2022</p> <p><b>Supplementary Planning Guidance AL5 Response by Old Stratford Parish Council Employment site allocation development brief:</b></p> <p>If 38% of the population in South Northamptonshire attained NVQ 4 Level or higher qualifications the large scale warehousing developments and distribution businesses are surely at the lower end of qualification level than that of NVQ 4 Level as most of these job opportunities are of unskilled or semiskilled levels.</p> <p><b>Contextual:</b></p> <p>What is the reasoning behind the joining up of the Ouse Valley Parkland? Is this a backdoor entry for Milton Keynes to move into South Northamptonshire as they have tried to do with their 2050 Vision?</p> <p>Why does this document put great enforces on the Ouse Valley Parkland at Old Wolverton Mill and Old Wolverton?</p> <p>In AL5 the document states small to medium scale units the dimensions state small 220 M2 and Medium 7,150M2 But on the footprint size of the Small units it states 250 M2 Medium units 8,000M2. Is this to give developers the opportunity to increase the size above that stated AL5?</p> <p><b>Visual:</b></p>	<p>There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation</p>	<p>The design principle that directly addresses the need for high quality building &amp; landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Why are there NO maximum height for warehousing units as this height shown in AL5 will have a massive visual impact, not only on visibility from the A5 roundabout also on the Stratford Road to Cosgrove. If this was planning brief's for domestic properties then then the phrase Incongruous to the Street Scene this surely hold true with such high buildings as warehouses.</p> <p><b>Should the SPD provide guidance on the types of materials to be used in the types of buildings as well as their maximum heights?</b></p> <p><b>Exemplar Development:</b></p> <p>In the light of high density warehousing and distribution developments how can this be shown to promote zero carbon footprint due to large scale vehicle movements? It should be mindful of the expected 180,000 daily vehicle movements at the rail freight gateway terminal at junction 15 of the M1. Unless all these extra vehicle movements are to be done by electric vehicle the zero carbon footprint is not achievable, merely planting thousands of trees is not the full answer to achieving zero carbon footprint. The document talks about reducing the need to use private transport and to promote a more sustainable public transport system. AL5 is situated some five to six miles to the nearest railway station and three to four miles from Milton Keynes. At present there is little or NO public transport to interconnect between either of the two a fore mentioned places.</p>	<p>implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to mitigated to the satisfaction of the decision maker. Reference is made to heritage which reflects the LTP2. Additional wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>	<p>design standards. Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change. Additional working in line with the Environment Agency's comments has been included to address such matters.</p>

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		<p>For Companies to fulfill their employee requirement they will have to recruit from outside of Old Stratford catchment area, which will mean transporting into the area adding to the volume of traffic in the Old Stratford area; this also damages the zero carbon footprint.</p> <p><b>Flooding:</b>  The document recognises that there is a flood plain site within the AL5 development. The large 16 hectare site will generate vast volumes of run-off water and one have to assume that this would be directed to this flood plain area, the volume generated during a rain storm delivering one inch of rain would generate some 27 million gallons of run-off water and again it must be assumed that there will be attenuation lakes and ponds to cope with volume of run-off water. If the surface runoff water is allowed to flow into the Dogs Mouth Brook this will produce flooding not only to the already stated flood plain, but may generate a new flood plain within the AL5 development site.it should be remembered that the Dogs Mouth Brook passes through the AL5 site and leaves via a 1.5 X1.5 meter brick lined culvert passing under and through the Buckingham Arm canal. Reference to the recent (xmas 2000) damage caused to the residents of neighbouring Cosgrove, Stony Stratford and Deanshanger parishes.</p> <p><b>Sewage:</b>  Sewage waste from this AL5 will have to be disposed of into old antiquated systems developed in the 1950's. These are not suitable for such a large scale development as AL5.</p>		

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		<p>Some 10 meters from the brick lined culvert there is a large open sewage outlet which on many occasions, throughout a year, runs raw sewage directly into the Dogs Mouth Brook. Evidence of this can be seen downstream of the brick lined culvert, where toilet paper and sanitary products can be seen hanging from the vegetation and when this open sewer culvert is running the colour of the Dogs Mouth Brook looks like raw sewage.</p> <p><b>Land Use:</b> Land use has purposely been left to degrade to allow the land owner to provide this, so called poor quality land to be used for warehousing development.</p> <p><b>Transport Access:</b></p> <p><b>Traffic surveys:</b> The Supplementary Planning Document (SPD) does not provide any guidance on traffic issues that many of these AL sites may give rise to, it is understood that any planning application must be accompanied with appropriate traffic surveys and mitigation proposals, nonetheless some guidance would be welcomed. The cumulative impact of the AL sites along the A5, A43, and A508 must be addressed. Guidance should be given that West Northamptonshire Council would expect to see that traffic surveys will show that all of these AL sites will have impact from all of the AL sites. AL1 to AL4 are along the A43 corridor, however, AL5 may have impact on this road corridor also. Any traffic leaving AL5 with routes to the M40 may use the A5 towards Towcester or the A421 towards Buckingham and Brackley and then join the A43, this will have impact on the movements generated by the AL1 to AL4 proposals.</p>		

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		<p>Some guidance should be given as to the scope and how exhaustive any traffic survey should consider would be very welcome, e.g. approximately 9 miles along the A5D at Fenny Stratford there is currently under construction of 2 m2 ft. of warehousing; some of this traffic will use the same stretch of the A5 as would be required to access the AL5 site, this should be taken into consideration.</p> <p>It is also well documented that much of the traffic end at a pinch point in Farthinghoe, in the South of the county, which goes the A422 towards Buckingham and Brackley, creating the need for a village bypass at Farthinghoe.</p> <p>Some reference should be given in the guide to times when the A5 and A508 serve as an alternative route to the M1, this becoming a more frequent occurrence with at least an incident every couple of weeks. The traffic survey/assessment must acknowledge the strategic role of the A5 and A508 when there are issues with the M1 via road works or traffic accidents.</p> <p><b>The SPD should state some indication as to what a full and comprehensive traffic survey should cover for these allocated sites and to include the cumulative impacts and the impact when the M1 has issues and traffic mitigates to the A5 and A508.</b></p> <p><b>Transport access to the AL5 site will be via a new roundabout, which is to be sited some 500 Metres from the A5 roundabout already identified by West Northamptonshire Council as a traffic pinch point.</b></p> <p><b>Heritage and Conservation:</b> I am somewhat perplexed to see that this document keeps discussing the sit heritage as being the Motte and Baily Castle, deserted village and Monastic grange at Old Wolverton, these</p>		

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		<p>references occur several times and these sites are some 3 to 4 miles from AL5; whereas the conservation area within and around Old Stratford, which is less the half a mile from the AL5 only get a cursory mention, what is the rationale for this?</p> <p><b>AL5 Impact on Residential Properties – Stratford Road and Old Stratford (Black Horse Drive)</b>  Stratford Road and Black horse Drive homes that overlook the northern and western edges of the AL5 site. This is acknowledged in the SDP and mentions that it needs to be handled sensitively.  This may be more for a planning application to set out and add conditions as to hours of use, light issues, odour and noise pollution. The SDP should give some indication that 24 hour operating times or pollution along the road will not be permitted. The type of conditions that the Council should be seeking would give clarity to both residents and developers.</p> <p><b>The SDP should give an indication as to the type of conditions the Council would seek to impose on the units near to residential properties on the AL5 site to prevent noise, light or odour pollution also the conditions for the hours of operation.</b></p>		
SPD129	B Barton	<p>Dear sir, further to the letter from CCTown Planning on behalf of Clowes Developments I would like to make additional comments to that previously made.  There is not enough detail in the SPD re CTIA on the A5/A43 roundabouts and specifically through Whittlebury and Cowpasturers Lane. Little traffic assessment has been made as to what would happen when the M1 is closed or once AL3 is up and running. Has anything been noted either once the new housing estates have been completed as to what effect this would have on traffic movements?</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment</p>

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		<p>The Shacks Barn access is unsuited to HGV use as there is no 'on' slip road directly onto the southbound A43 which would mean all traffic leaving the site heading south would have to either go through Silverstone (A413) or Whittlebury.</p> <p>The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p> <p>The use of other large industrial sites in the area such as Northampton has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn, and should not be used as a precedent. LP2 allocation's are for all Non-Strategic Development.</p> <p>No building to be taller than existing nearby sites, i.e. AL1 and AL2 this is site 4 on page 28 of the SPD and for AL4 it is site 6 on page 30 of the SPD.</p> <p>No building should be set higher than 10m at AL2 due to its rural location and the geology of the site which sits on the Whittlebury Ridge and makes the site more exposed.</p> <p>Tree screening should be large scale and immediate and not after 15 years and maintenance to the trees on going to make sure any dead trees are replaced.</p> <p>Lastly the employment allocations were based on the need to employ local people. This won't happen. The developers need to demonstrate how they will meet local skills requirements. We need to know more about these jobs and the skill levels.</p>	<p>development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further</p>

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			<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>impact assessment in line with the general principles set out in the SPD.</p>
SPD130	J Reason	<p>I am seriously concerned about the large scale applications that have been put forward by various developers around the A5 roundabout and at Shacks Barn.</p> <p>My major concern is the massive increase in traffic that these developments will create, not only at that already extremely busy and dangerous roundabout, but also through Towcester and the villages of Silverstone and Whittlebury in particular. I see that each of the proposed developments has put forward a predicted increased traffic assessment. These are individually worrying enough, but I believe that there has as yet been no cumulative assessment if all the developments go ahead. The prospect is extremely disturbing.</p> <p>I am also extremely concerned that the proposals diverge so far from the original Local Plan. I believe the idea was to encourage local industry and provided local employment, and, for this purpose only small to medium size units were to be built, not the huge warehouses that have been proposed, which can be of no benefit to the local community but will be very</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on</p>	<p>No changes necessary.</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>imposing and very damaging to the landscape of this rural community.</p> <p>I would like to know why were these proposals even considered when there is clearly no need for extra huge warehousing in the area due to already existing and empty warehousing very close by, but even more so why they have got this far at all when they are so far away from what was stated in the original Local Plan?</p>	<p>the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	
SPD13 1	D Wallen	<p>I have been made aware over the last few weeks of the large scale applications that have been put forward for the areas around the A5 and the A43.</p> <p>I am a Silverstone Village resident and have a number of concerns regarding these currently beautiful areas.</p> <p>From the documents that I have seen I worry that unless strict controls are legally in place any developments may grow out of control. I would like some assurances that the following points in particular have been thoroughly considered.</p> <p>1. Traffic</p> <p>In the case of Shacks Barn in particular, although there is access from the North to the site, there is no direct access from the South. This obviously means that haulage and other traffic will leave the A43 at Brackley Hatch and travel along the A413 through Silverstone village past the Infant and Junior School to Shacks Barn.</p> <p>Furthermore once the Towcester relief road is complete this will be made worse, probably in both directions. I can only imagine that this becomes massively worse when there are problems on the M1. I would hope that a full traffic assessment has been completed including the effects of housing developments at (but not restricted to) Silverstone Leys and at Towcester Race Course.</p> <p>2. Building Footprints</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Strengthening of wording has been added to the SPD</p>

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		<p>I am extremely concerned over the changes to footprint sizes that I understand have been proposed. I am led to believe that originally discussions allowed for small and medium sized units. However this has now changed to 8,000m2 units with no upper limit. I would certainly oppose anything along those lines. I would also like there to be some legally binding control over how these structures would look. As you know the country side around this area is currently beautiful. Once it is ruined there will be no going back!</p> <p>3. Building Heights I am advised that a proposal exists for a 15m structure at Shacks Barn, 16m at The Bell Plantation and 12m at Woolgrowers. As a dog walker, I am very much aware that Shacks Barn is visible from a considerable distance and that no amount of tree planting will hide this, also trees can take 15 years to reach sufficient height to be considered a screen. In all of the above locations I would ask that height restrictions are imposed to limit build heights to be well below the proposed levels. I understand that a 7m maximum has been suggested.</p> <p>4. Light Pollution As one has to assume that the proposed buildings will operate 24x7 I would be very unhappy with the potential light pollution that will emanate from these buildings.</p> <p>5. Potential Employment for local people. As far as I am aware there is no evidence that unskilled or low skilled warehouse jobs would be suitable for people who live in the surrounding villages. I would like to know how this has been assessed in tangible terms including actual skill levels and NVQs. I would hope that you will take the above into consideration, and come back to me with your answers to the</p>	<p>to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>to ensure that issues such as noise and light are considered as part of the planning application process.</p>

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		<p>questions raised and reassurance that I have asked for. I hope you will gather that I am opposed to all of these developments.</p>		
SPD13 2	B German	<p>I would like to make the following points regarding the SPD. I feel that the wording in the guidance is too fluffy and too vague which will allow too wide an interpretation of the guidance.</p> <p>The employment criteria should reflect what was agreed in the LP(2) document ie to provide suitable employment opportunities to fit the skills of the local people and not low value warehouse roles. The objective is to reduce out commuting and not promote in commuting.</p> <p>The Local Plan (2) States that the land allocated is for small to medium sized units. Large Scale buildings were never mentioned in the plan and is a clear breach of the intentions of the LP(2) . There should be no mention of large scale or B8 warehousing. That would be a clear breach of the aims of the LP(2).</p> <p>The Ridge heights should be specified as no taller than 10m AOD for AL1/2 and 7.5 M AOD for AL4.</p> <p>LP(2) aims to make Towcester a Tourist friendly place to visit and it is a Historical Town , It is not an area for strategic development like the Swan Valley.</p> <p>There needs to be a comprehensive traffic risk assessment on how these sites AL 1-5 will impact on the road network around Towcester and the surrounding villages. This needs to be done in a professional way, taking into account not only increased traffic numbers but the noise and air pollution which will result.</p> <p>AL3 should also be included in the SPD to provide consistency and to follow the time of the original LP(2).</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>Additional wording has been added regarding AL3 to set out that alongside revised planning</p>

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		<p>Landscape screening , any trees planted to screen the sites should be large scale and the site operators must be made legally responsible for the upkeep and management of the woodland. Tree planting on the top of bunds is unacceptable. *AOD means the reference points from which all the measurements are taken prior to building are expressed as 'Above Ordnance Datum' using the national ordnance levels (derived from sea level). This ensures there is consistency in levels throughout each site and can be compared to road levels. Therefore ridge heights must be considered in combination with "Above Ordnance Datum" (AOD) and site topography. Where a site slopes, developers may (as is intended for AL1 and AL3) create plateaux on the land, which elevates buildings well above road level and has the effect of elevating the building up into the sky.</p> <p>I do not want the SPD to Large Scale buildings in any final document which might open the door to developers considering this document as the key to impose their plans on the people of Towcester and the surrounding area.</p>	<p>will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>
SPD13 3	J Rudland	<p>I write in connection with the public consultation that is taking place with regard to the Shacks Barn industrial estate.</p> <p>I would like to put on record that insufficient consideration has been given by the developer of Shacks Barn Industrial Estate and West Northants Council Planning Dept, for the very valid concerns of Silverstone residents.</p> <p>Among these concerns are the following:</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application</p>	<p>No changes necessary.</p>

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		<p>9. Having a huge number of extra commercial vehicles through the village to access this estate will increase danger to all occupants, particularly the elderly and children, traffic will have to come through the village, there is no direct access to the site from the A43 coming from the south. The notion that vehicles will drive further down the A43 to come back up to the access road for this site is wishful thinking and long term will never happen.</p> <p>10. Over the years Silverstone has become the dumping ground for large scale developments to the detriment of what was once a beautiful, historic, woodland village. What remains, is now to be scarred again by oversized and over high industrial tin sheds. These structures will be visible from the village however many hedges or trees are planted and will be a visual eyesore for all future generations. Even the Industrial Park at Silverstone Track has limited the size and height to which their units are to be constructed, no such restrictions have been entertained by Shacks Barn.</p> <p>11. If the units that are being built are classified warehousing there is not even the benefit from employment since very few staff are required to run a warehouse.</p> <p>Please ensure that considerate planning is given to this development and that further degeneration of Silverstone village is avoided, it would be unforgivable if our village were to become the 'slum' area of Northamptonshire.</p>	<p>stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	

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SPD134	D Keeble	<p>I am one of a very large number of South Northants residents who was shocked and most concerned by the approval of the IM Properties proposed development for AL3 by WNC back in January. I am therefore pleased to see the publication of the draft SPD and sincerely hope that when completed it will be effective in guiding and supporting the future development of 4 of the 5 employment allocations in South Northants (AL1, AL2, AL4 and AL5) to ensure sensible and appropriate outcomes. I fully support its purpose to “reduce uncertainty” and provide “clear guidance” on what is expected from future developments and while the format and much of the content is good, I believe there are certain sections where it must be amended if the document is to meet its stated purpose. I have focussed my comments on 3 key areas:</p> <ol style="list-style-type: none"> <li>1. Cumulative Traffic Impact Assessment</li> <li>2. Small and Medium buildings - with a Maximum Footprint of 5000m2</li> <li>3. Maximum Ridge Height of buildings – up to 10m.</li> </ol> <p><b>Cumulative Traffic Impact Assessment:</b> Para 1.21 on p8 describes Transport Assessments and Statements and I know that this is an area which greatly concerns me and many other local people. On that basis it is very important that the correct wording is used in the SPD and my proposal for 1.21 is: “It is important to give appropriate consideration to the cumulative impacts arising from the other committed development (ie development that is consented or allocated where there is a reasonable degree of certainty it will proceed within the next 3 years). At the decision-taking stage this will require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of transport network as well as other relevant local sites benefitting from as yet</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the</p>

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		<p>unimplemented planning approval. For each development application, traffic impact should be assessed on a consistent basis across sites, and cumulatively factoring all built and committed sites that have an impact on the same stretches of road. This is in the context of prior pinch point funding on the Tove/Abthorpe roundabouts and predicated on creating a road network able to cope with 3000 new houses on the southern side of Towcester”.</p> <p><b>The principle of Small and Medium buildings with a Maximum Footprint of 5000m2:</b> I firmly believe that the original Local Plan was always intended for employment developments with small and medium sized buildings. This is of course in line with current developments along the A43 corridor around Towcester and these have already set the precedent with buildings up to 5000m2. I therefore strongly request that the wording in the SPD makes it clear that AL1, AL2 and AL4 will only have small and medium (up to 5000m2) buildings permitted and all references to large buildings over 8000m2 being allowed “in exceptional circumstances” are removed. The section of the SPD which starts on p24 provides important details about the Contextual Considerations for these four employment allocations including the precedent set by the existing scale, form and character of development along the A43 and particularly the sensitivity required for any new development within the rural setting north of the A43 (i.e. for AL1 and AL2). This concludes on page 38 with a description and definitions of Small, Medium and Large buildings. I request that the final paragraph on p38 is amended to read:  “The presumption will be for the accommodation, across the employment sites of a mix of small and medium units up to 5,000 m2, as defined above. There will be no ‘exceptional circumstances’ where large scale buildings are agreed for AL1-</p>	<p>information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>4 as this would contradict the relevant Local Plan policies and the precedent already set for the A43 corridor".</p> <p>The section of the SPD called Assessment and Evaluation (p66 onwards) gives details for each of the 4 employment allocations, and this includes "Building Height, Scale and Massing" in 6.25 (AL1), 6.47 (AL2), 6.65 (AL4) and 6.91 (AL5). In each case I request that the relevant paragraphs are amended to clearly state that only Small and Medium sized buildings will be acceptable, and any references to Large sized buildings are removed.</p> <p>Finally in para 3.1 on p24 the 1st bullet point states that "the existing scale, form and character of development along the M1 and A43 relating to AL1 – AL4" is a "contextual consideration". I strongly argue that the current development along the M1 is NOT a contextual consideration for AL1, AL2 and AL4 in the rural setting along the A43. The M1 / Swan Valley area is defined as a "Strategic" development in the West Northants Joint Core Strategy and as such its numerous very large buildings are viewed as appropriate. In contrast I believe the sites AL1, AL2, AL3 and AL4 were selected as "non Strategic" for the Local Plan and identified as being suitable for small and medium sized buildings. I recommend that the wording on pages 24 and 25 is corrected to make this point clear as Contextual Consideration.</p> <p><b>The control of the Maximum Ridge Height of buildings to 10m:</b> the Landscape and Visual Considerations for the 4 employment allocations is described on pages 42 to 59, along with the many sensitive receptors in each case. Like many local people I firmly believe that controlling and restricting building Height is a key consideration in reducing the visual impact of each new development. From p66 onwards (Assessment and Evaluation) the SPD gives details for each of the 4 employment</p>		



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		<p>allocations and this includes "Building Height, Scale and Massing" in 6.25 (AL1), 6.47 (AL2), 6.65 (AL4) and 6.91 (AL5). The stated maximum building heights vary by site but I firmly believe that the maximum Building Ridge Height (AOD) must be no more than 10m for all the employment allocations to effectively manage the significant risk of adverse visual impact and request that the relevant paragraphs in Section 6 are changed to state this. For clarity my recommendation is that Ridge heights must be measured in combination with "Above Ordnance Datum" (AOD) and site topography. AOD provides a standardised measure of height across sites (usually relative to sea level). Where a site slopes, developers must not create a plateau on the land to elevate buildings above road level. Instead the site should be excavated to AOD road level to reduce visual impact on the neighbourhood. A ridge height limit of 10m in relation to existing road levels is therefore essential, and I recommend that the existing road level reference is the A5 for AL1 and Towcester Road for AL2.</p> <p>I sincerely hope that these points and my proposals for amending certain sections of the SDP will be taken into consideration.</p>		
SPD13 5	Syresham Parish Council	<p>Syresham Parish Council would like to make the following comments regarding the draft Employment Allocations Supplementary Planning Document:</p> <p>The proposals will increase the traffic on the B4525, from which the weight and speed limits have already been removed. The status of this road is not suitable for an increase in traffic.</p> <p>The plans are not compliant with WNC's own design principles on provision of access.</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on</p>	No changes necessary.

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			highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.	
SPD13 6	Canal and Rivers Trust	<p>We are the charity who look after and bring to life 2000 miles of canals &amp; rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.</p> <p>One of the Canal &amp; River Trust's charitable objects is to promote, facilitate, undertake, and assist in for public benefit, the restoration and improvement of inland waterways. We are, therefore, generally supportive of any sustainable project seeking to expand the country's inland waterway network.</p> <p>Based on the information available we have the following general advice:</p> <p>Of the employment sites identified in the draft Employment Allocations Supplementary Planning Document (SPD) AL5 - land at Former Furtho Pit, Old Stratford/Cosgrove is of most relevance to the Trust. The site is crossed by the line of the disused Stratford Arm of the Grand Union Canal which connects to the mainline at Cosgrove, just north of the site. Although only the first section of the Arm is still in water, the bed of the canal arm is owned by the Canal &amp;</p>	The Local Plan Part 2 requires the detailed consideration of the safeguarding of the existing canal route through the site and how the layout of the country park has regard to the potential future need for new sections of canal to cross it to facilitate restoration.	

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		<p>River Trust up to the point it is crossed by the A5 dual carriageway. A significant section of the disused canal falls within the site allocation as identified by the red line on the submitted plan.</p> <p>As per the requirements of Policy AL5 of the South Northamptonshire Local Plan (Part 2) it is important to ensure that there is detailed consideration of the safeguarding of the existing canal route through the site. The location of the existing route of the Stratford Arm of the Grand Union Canal and any potential restoration lines should be clearly identified within the SPD and the requirement for any future development proposals to fully consider any potential impacts to it or its future restoration should be clearly stated.</p>		
SPD137	Cllr D Bambridge	<p>I attach the response to the current AL site Supplementary Planning Guidance consultation that has already been sent to you by fellow Silverstone Ward Councillor Charles Manners and supported by Cllr Alison Eastwood.</p> <p>I as a ward member for the Silverstone Ward fully support this response.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a</p>

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			<p>safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local</p>	<p>proposal for each site.</p> <p>The wording relating to frontages onto the A5 and Towcester Road has been strengthened.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout</p>

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			<p>flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The SPD can be revised in future to include AL3 as necessary. Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner. Planning applications and the suitability of the redline boundary will be determined against the development plan and material considerations</p>	<p>the document that will seek to encourage/steer applicants towards more ambitious design standards. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be</p>

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				subject to a further impact assessment in line with the general principles set out in the SPD.
SPD138	P German	<p>With regards to the Local Plan part 2 and the Draft Consultation, I would like to point out the following areas of concern which I believe need to be addressed in the SPG:</p> <p>1. No buildings should be larger than adjacent, current max allowance (page 28 of SDP for AL1/2) (page 6 for AL4). The Ridge heights should be 10m or less AOD for AL1/2 and 7.5 AOD AL4 which currently stand as precedents.</p> <p>2. A cumulative traffic impact assessment should be set out in more detail regarding A5/A43 roundabouts and surrounding local roads. This assessment should include postopening of relief road, M1 closures which are very frequent and cause huge delays, completion of Towcester Vale housing and traffic arising from completion of AL3. The SDP absolutely must include cumulative assessment to include the afore-mentioned scenarios and sufficient funds should be allocated specifically for mitigating arising ratrunning through villages Tiffield, Caldecote, Duncote and Green's Norton. More scrutiny should be made of the dangers of the resulting rat-running through these small villages on narrow (single-track included) roads where vulnerable pedestrians can be found.</p> <p>3. Landscaping should include a large proportion of sufficiently mature trees to make a difference and not employ the bunds as</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has</p>

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		<p>screening/planting areas. Saplings are of little use and all landscaping should be maintained by the developers given recent drought experience.</p> <p>4. Local Plan 2 showed allocation of these sites for <b>small and medium-sized units</b> and that should remain the maximum scale for these sites (i.e. 5000sqm). <b>Large units (8000sqm) will be wholly unacceptable</b> and would be, in fact, a new policy.</p> <p>It must be stressed that units cannot be joined at a later date to enhance their size.</p> <p>5. One of the given aims of LP2 is to reduce out-commuting. Taking into account the demographics of the town and surrounding villages, this will not happen and will in fact cause heavy in-commuting with the resultant traffic arising (see below).</p> <p>6. Employment offering - 'in part' page 24 para 3.2 should be removed and more made of the 5 employment criteria in LP2. "To attract new investment and provide jobs to match the skills of local people'. As outlined in point 5 above, this aim will not be met due to the highly skilled demographic of the area (professional, managerial, high tech).</p> <p>7. Swan Valley should not be used as context in the case of AL1-5. It is a 'strategic' development according to WNJCS whereas AL1-5 are sited as non-strategic.</p> <p>8. The wording for the Design Principles need to be more directive. 'may', 'should', 'could' invite interpretation by the developers.</p> <p>Please add my thoughts above to the SPD response.</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduce the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals</p>	<p>been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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			would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.	
SPD139	M Dean	<p>Large scale development sites are not required in Towcester due to the plethora of such sites by the M1 motorway junctions, Swan Valley, et cetera.</p> <p>I recognise the need for limited small-scale development to provide employment opportunities for the expanding local population but it should be just that-small scale.</p> <p>The developments proposed are definitely not small scale and would draw in low skilled workers from outside the area adding to the traffic problems that would arise from large trucks supplying components to, and finished goods from the premises.</p> <p>Any development near the A5 /A43 junction must provide for the fact that at some stage, a flyover will need to be constructed with associated slip roads. Any development that impedes this eventuality should be refused.</p> <p>As a chartered surveyor having been involved with Milton Keynes since its inception, the original concept of no buildings being higher than existing surrounding trees stood it in good stead and ensured minimal visual impact of all the construction work and completed buildings. After the development corporation was disbanded, this restriction has been ignored with disastrous results. West Northants District Council should adopt the original MKDC approach to any new development.</p>	The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.	No changes necessary.
SPD140	G Meller	Firstly, I wish to make the point that the rate at which Towcester is being developed is alarming, particularly given the lack of	The Local Plan Part 2 requires a transport assessment and travel plan	Additional wording will



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		<p>consultation with local people – when I told DHL there is no chance their monstrous plans would be allowed, I was informed that my Council had already allocated this land for their purposes!</p> <p>I cannot understand why Towcester is projected to grow at a rate of what must be 600 or 700% when the ONS predicts about 7.5% UK population growth for the next 20 years! It feels like WNC has lost control of development in this area, so I hope that this consultation is an attempt to take back (albeit belatedly) some of that control.</p> <p>The consultation focuses on employment, but it is well known in the logistics sector that in the early days, these massive warehouses bus in staff from other areas, and then automate the facility so that they are no longer required. As a consequence, there is no benefit locally.</p> <p>The proposed large-scale buildings for AL1-5 are completely inappropriate for Towcester and would totally ruin the character of this market town. If any development is allowed, please keep its height to a minimum and prevent the requirement for large numbers of heavy vehicles.</p> <p>We have lived in this area since 1989 and have witnessed a gradual and serious deterioration in the traffic situation, to the point where the A5 and A508 are now difficult/dangerous to access during rush hours. The Towcester bypass was under discussion when we first arrived so it is enormously disappointing that it is now set to be a single-lane service road for the vast numbers of new houses. With several roundabouts, the road will be avoided by heavy traffic which will continue to congest Towcester and its air quality management area.</p> <p>On the subject of air quality, I find it shocking that the Council does not have any real-time monitoring in place; preferring to rely on a handful of cheap (monthly average) NO2 tubes.</p>	<p>to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include matters such as air quality.</p>	<p>be added to the SPD to reflect the need to mitigate against the impacts of climate change.</p>

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		<p>Particulate matter is not monitored at all! Nor indeed is any other parameter. As a consequence, the Council writes to Watling street residents and businesses warning them to shut their windows because, in the absence of data, it knows that such a congested highway must result in air pollution, and the proposed developments will only make it worse.</p> <p>When DHL held their open day, their traffic consultant, astonishingly, had no traffic data to offer.</p> <p>I very much hope therefore that the Council will apply a high degree of scrutiny to the cumulative effect of all of these outrageous proposals, particularly given the unacceptable nature of the current highways.</p> <p>As I hope you know, one of the main traffic problems that Towcester faces is the regular issues that occur on the M1, which force satnavs to divert drivers through J15a and J15 into our area, creating chaos. Please take this into consideration when assessing the cumulative impact of all these proposed developments. Towcester is grid-locked and Shutlanger becomes a rat-run during these periods.</p> <p>Finally, WNCs policy on climate change is woeful. The vast majority of a Council's impact is in the carbon footprint of the development that it permits, so why is this not the major issue? CPRE recently said: "The vast majority of local councils have now declared climate emergencies – but they don't have strategies in local plans to make sure they reach net zero" adding: "</p> <p>'Without clear strategies involving housing, businesses, industry and transport ... it's unlikely that councils can meet their climate targets"</p> <p>The SPD document says: "7.1 The Applicant will need to <b>explore and demonstrate</b> the delivery of measures that enhance the development's sustainability, <b>pushing it towards a</b></p>	<p>Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change.</p>	

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		<p>zero carbon development. This should take account of all aspects of construction from the supply chain to building design and its lifecycle, as well as the environment in which it sits.” Developers will laugh at this. This woolly language will have little effect on developers, providing them with an opportunity for greenwash – install a few electric car chargers and solar panels and the box is ticked – maybe throw in a few offset contributions.</p> <p>This language needs to be much stronger and the greenhouse gas emissions data needs to be defined. If the developer is ripping up green fields and replacing them with concrete and asphalt, what is the carbon effect of this? And going forward, what will the carbon footprint of the proposed business be??</p> <p>Further to my previous comment, on a slightly different but connected matter, I would also like to add a general comment about housing development in general.</p> <p>According to the ONS from 2025 more people in England will be dying than being born so the perceived housing shortage will gradually diminish anyway. So I cannot understand the Council’s desire for rampant unrestricted development of this area. Why have local landowners been asked to suggest land for development when it clearly is not needed?</p> <p>My suspicion is that if there is a temporary housing shortage it will be for low cost or starter homes, but the vast swathes of new homes that now envelop Towcester do not fit that category.</p>		
SPD14 1	Karen Lockton	Please find following my comments on the above document. No doubt many of my comments will reflect and be reflected in the comments you receive from others. It is hoped that the statements by WNC representatives that community input will be properly taken into account and reflected in the final version of this document.	The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The employment allocations were identified to meet local demand and	The SPD will be amended to confirm that the heights are

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		<p>The development of the Local Plan, and especially its consultation process, has been less than adequate or transparent to the communities that it is supposed to benefit. There is now hope within our communities that the SPD will go some way to mitigating the major errors made during that process.</p> <p>I am deeply disappointed that, as a result of badly informed Strategic Planning Committee members and poor Committee protocol, massive warehouse development at AL3 has been accepted and is excluded from the SPD. As a result, Towcester will be forever scarred by a completely inappropriate development that future generations will have to live with.</p> <p>At first read, the SPD is littered with terms such as 'may', 'should', 'seek to', 'where possible', 'explore', 'look to', 'could', etc. The purpose of the SPD, as stated in several places is to reduce uncertainty and provide clear guidance to landowners, developers, planners and the local community. Removing this type of phrasing and tightening the wording is essential to achieve this.</p> <p>I have noted paragraph references for ease of interpretation of my more detailed comments.</p> <p>1.7 The SPD should emphasise that the whole purpose of the LP2 sites AL1-4 was to identify and to facilitate non-strategic small scale employment opportunities to provide additional choice and opportunity for the growing population associated with the strategic development site to the south of (Towcester). To date the proposals for all development sites appear to have completely lost sight of this requirement. South Northamptonshire's Economic Growth Strategy 2.6 and 2.22 The SPD describes the 5 roles set out in the Part 2 Local Plan as very clear to ensure they meet local demand. I agree, however the SPD needs to categorically reinforce the</p>	<p>strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	<p>indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent,</p>

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		<p>importance of developments needing to meet all the 5 tests namely:  Meet local demand and strengthen the rural economy;  Provide the ability to strengthen local supply chains;  Local flexibility and choice of locations;  Meet the demand for small and medium sized units; and contribute to reducing the level of out-commuting.</p> <p>2.15 I have two observations on this section:  The WNC Joint Core Strategy states that some elements of manufacturing related to the high performance technologies sector are growing but often means fewer employees. I agree, but the strategy fails to mention is that exactly the same is happening with warehousing albeit on a much larger scale and without the benefit of high performance technology jobs at scale as is required locally.  The SPD states that delivering new space to cater for the warehousing sector on a trendbased trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy. It is very evident that the current proposals for all 4 sites are completely trend-driven with no provision for future growth requirements as is required within the NPPF guidelines for sustainable development.  Research and Development Objective  South Northants has a very rich and ongoing association with applied R&amp;D in areas such as automotive advanced manufacturing. None of the current proposals for all 4 development sites appear to meet this objective.  All these employment allocations were based upon fulfilling employment need to reduce out-commuting. There is no evidence base for unskilled or low skilled warehouse jobs in South Northants. Developers need to demonstrate in detail how their development will meet local skills requirements. It should be a requirement that the developers set out the actual jobs</p>	<p>impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	<p>that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on possible types of jobs.</p> <p>Part 2 Local Plan</p> <p>2.21 On the same theme, the SPD needs to reinforce that the aim of the Local Plan is to attract new investment and provide more jobs to match the skills of local people. Local skills means meeting the needs of Towcester and South Northants where skills and education attainment are significantly higher than those of West Northants and the region, without this there is a inevitability of lowering the overall local skills set and thereby, the economic profile of the area.</p> <p>2.23 The SPD states that employment sites are to be accompanied and supported by an independent study providing market led evidence on the proportion of B1, B2 and B8 uses to be delivered. The SPD needs to remind developers that the study needs to be both current and truly independent, based on verifiable market demand, not on justifying their proposed use. To be demonstrably independent these need to be at a minimum, jointly commissioned by the developer and WNC, reasoning would require that for transparency and true objectivity, they should be completely commissioned by WNC.</p> <p>Socio-Economic Context</p> <p>2.29 to 2.35 Again, far more emphasis needs to be placed in the SPD on the socioeconomic context for Towcester and South Northants. The SPD rightly points out that South Northants' skills and educational attainment are significantly above those of both the East Midlands and West Northants. I refer to the Quality of Life Survey, showing the area to be prosperous with a highly skilled workforce and one of the lowest unemployment rates, a higher than average number of residents employed in managerial, professional and skilled</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	

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		<p>occupations, etc. I would point out that this data appears to have been ignored by the developers.</p> <p>Scale, Form and Character</p> <p>3.3-3.5 It is extremely disappointing to see the SPD using Swan Valley and other large scale strategic developments along the M1 as a comparison to the non-strategic, small and medium developments sites round Towcester. It is very evident that Swan Valley has no similarities whatsoever with Towcester or the A43 technology corridor. It is an open, very large group of sites, with no established housing nearby, and with immediate access to a major arterial route which is one of the largest motorways in the UK. Swan Valley largely consists of large scale, predominantly distribution developments. The SPD needs to be quite clear that Swan Valley is not compatible and does not set a precedent for Towcester and its surrounds.</p> <p>To reiterate, Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn (AL4) and should not be used as a precedent. It is Strategic Development, whereas the LP2 allocations are ALL for Non-Strategic Development.</p> <p>On page 24, para 3.2 I request that 'in part' is removed from the role of the employment sites. These sites were never intended only as 'in part' for small, medium developments but rather, the WHOLE of the LP2 is for small and medium development.</p> <p>AL1 &amp; AL2</p> <p>3.10 and 3.12-3.14 The SPD recognises that the scale of development at Old Greens Norton Road and Tove Valley Business Park varies between 350m2 and 5,000m2. Even at</p>		

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		<p>Silverstone Business Park and Silverstone Park the units are only between 250m<sup>2</sup> and 5,000m<sup>2</sup>.</p> <p>The SPD acknowledges that there is a corridor of technology-related employment emerging along this stretch of the A43. Following this, the SPD is failing to promote the opportunities this presents for Towcester. There is considerable scope for the technology corridor to extend from Silverstone to the Towcester Northern Gateway – an approach which has a far closer fit with the skills and educational attainment levels in the area.</p> <p>Rural Setting</p> <p>3.15-3.17 The assessment of the area surrounding AL1 and AL2 to the north of the A43 is appropriately characterised by land form that gently slopes north to south down to the River Tove with views from the public road and path network towards Towcester and the wider countryside, and that there are a series of small settlements largely of a height and scale in keeping with that of large agricultural buildings in the area. Although there is a failure here to note that the proposed development of Shacks Barn (AL4) stands upon the Whittlewood Ridge with wide ranging visibility for miles around. The SPD needs to be quite clear that a large agricultural building, such as that shown in Figure 19, does not relate in form, scale or character to a large warehouse building. It is far more similar to a small industrial unit (using the SPD's definition on p39). The control of the maximum ridge height of buildings on AL1 and AL2 should be 10 metres, whereas the maximum ridge height for the buildings at AL4 should be 7 metres. This is because of its rural location and position on the Whittlewood Ridge which lends to far reaching visibility of the site. That is the precedent for the local</p>		



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		<p>area and would fit with the intent of the Local Plan (2) for small and medium sized units.</p> <p>3.18 Again, the SPD statement that the ability to provide development whose form and scale considers/reflects the rural character of this area through built or landscape elements will enable a more gradual and sensitive transition from North Towcester to the surrounding countryside is entirely appropriate. The SPD should place a much stronger emphasis on this key consideration.</p> <p>The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be defined and specific – it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location. The existing development at Bell Plantation would be a good example of this.</p> <p>Unit Size Definitions</p> <p>3.20 I entirely and forcefully disagree with the statement ‘if delivered sensitively and in line with policy this could see the delivery of some small sized buildings alongside medium and large development units’. This is a dangerous precedent to set within the SPD. Further, the reference to large development units is introducing a new planning policy and is therefore contrary to the remit of an SPD (2.2). Equally this statement is in direct contradiction to the earlier narrative about the open and sensitive nature and characteristics of the areas surrounding AL1 and AL2. The statement should read ... the delivery of some medium sized buildings alongside small development units.</p> <p>3.22 The Towcester Masterplan states that the northern gateway acts as a key arrival point into the historic settlement of Towcester. This needs to be reflected in the design quality, scale and massing of all the</p>		

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		<p>allocated land sites. The SPD should note that Silverstone, Whittlebury, Caldecote, Duncote, Greens Norton and Tiffield are also important historic settlements that deserve the same level of design quality, scale and massing considerations in relation to the development sites.</p> <p>This section in principle is extremely important since it is essential to have a definition of what is meant by small, medium and large developments.</p> <p>I would agree with the SPD's definition of small units being 250m<sup>2</sup> to 2,500m<sup>2</sup>. However, definition of medium sized units, should be between 2,500m<sup>2</sup> and 5,000m<sup>2</sup> (not 8,000m<sup>2</sup>). The SPD cites Tove Valley Park and Silverstone Park as local examples of medium sized buildings. As already stated, I reject entirely the inclusion of Swan Valley since this is not reflective of buildings appropriate in scale, form and character local to the Towcester area.</p> <p>I understand the inclusion of large buildings for academic comparison but do not support any possibility of development of large buildings since they are completely alien to the landscape surrounding Towcester and most importantly would be introducing a new planning policy, contrary to the legal remit of the SPD.</p> <p>The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p> <p>It should be clarified that smaller/medium buildings cannot be joined up at later dates to form larger units.</p>		

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		<p>One of the major issues relating to the proposed developments on the edge of Towcester are the building heights, and the potential impact on surrounding areas. In fact under section 4 the SPD rightly looks in detail at the potential visual impact of each development site. As a consequence I am very concerned that this section makes no mention of building heights, especially as they relate to floor area. For instance the current planning application for the AL1 site proposes up to 24m ridge height. These are truly enormous building heights which are totally out of keeping to this locality and will dwarf any existing buildings in Towcester let alone its rural hinterland.</p> <p>I would strongly urge the SPD to adopt a maximum height of 10 metres across sites AL1 and AL2, and lower for AL4. With the proviso that no building to be taller than any existing building on a nearby site ie for AL1 and AL2 this is site 4 (on page 28 of the SPD) and for AL4 this is site 6/Silverstone Business Park/Shacks Barn (on page 30 of the SPD).</p> <p>AL3 (Tiffield Lane) which already has planning permission, should be subject to the same SPD conditions on all future developments within that site ie on changes and extensions to the existing planning permission on that site. The size of the buildings that have already been allowed on this site must not be used as a precedent for the other sites.</p> <p>Landscape and Visual Consideration p43-55 I welcome the Sensitive Receptors, and in particular the Viewpoint 1-15 for AL1 &amp; AL2 and Viewpoints 1-12 for AL4, which illustrate the enormous impact inappropriate developments could have on Towcester and its surrounding rural areas. It is a pity that, so far as we are aware, the planning applications submitted to date made no real attempt to assess the real immediate visual impact of their schemes. A period of 15 years until planting is fully effective is not acceptable. The SPD should make it a requirement that all</p>		

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		<p>applications include visual impact assessments based on the Sensitive Receptor/Viewpoint locations as a minimum. Further, those buildings that impact the roadscape should be compatible with the heights of existing building on those roads to ensure that they do not visually overwhelm that scape. I would reiterate that screening using trees must be large scale, not planted with the possibility of full screening only after 15 years. Further, maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable and insufficient screening.</p> <p><b>Allocated Land Over-Development</b></p> <p>The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. This is of particular importance for AL4, where the developer has already attempted to increase the development site area by 28% through placing the drainage ponds outside of the allocated land area.</p> <p>Ensuring that all planing mitigation and infrastructure associated with these developments is contained within the allocated land areas will prevent over-development of the sites and reduce the temptation to attempt further development on non-allocated neighbouring land.</p> <p><b>Overarching Design Principles</b></p> <p>5.1 I understand that the SPD needs to offer a degree of flexibility in order to conform to the NPPF. However, I would urge WNC to ensure that prospective developers to be ambitious in their quality of design rather than rolling out their standard design pattern book with no regard to the existing nature of the area.</p> <p>5.3. The 12 general design principles are very welcome, I would like to add further as follows.</p>		

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		<p>Bullet 2 – this fails to recognise that development platforms are determined almost entirely by the size of building, more particularly on a sloping site. For instance an 8,000m<sup>2</sup> building will require proportionately more cut and fill compared with a building half its size. As a consequence there is a far greater likelihood of a platform having to be built up from existing ground level, as that is more cost effective, thereby causing a much greater visual impact.</p> <p>Bullet 7 – using footpath, cycle and road networks to support and encourage sustainable travel to and around the site is completely appropriate. However, this fails to take into account that the type of use will have a major impact on the levels of sustainable travel.</p> <p>Distribution logistics/warehousing is likely to require a workforce to be sourced outside the Towcester area (especially when you consider the local socio-economic profile - 2.29) which completely undermines the case for sustainable transport. It is also extremely disappointing that the current AL1 planning application fails to provide a quality cycle and pedestrian route from Caldecote to the site and then on to Towcester.</p> <p>Bullet 12 – the list of methods for limiting the impact on tranquillity of each site's rural setting should also include operating times, especially since the prevailing wind in the UK is from the south-west so in the case of AL1 noise pollution is more likely to be carried to residential areas.</p> <p>It is essential to provide evidence of cumulative impacts on the wider road network and key junctions/roundabouts as well as assessing the local impact of increased traffic arising from the development proposed.</p> <p>Much greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the</p>		

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		<p>villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3 (with its large scale planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no southbound access into the A43, meaning all vehicles travelling south will pass directly through Silverstone village or Whittlebury.</p> <p>Site AL4</p> <p>6.60 I am enormously disappointed that the SPD makes very little reference to access to and from the AL4 site. The site has good north-bound on and off access onto the A43, although there will still be major issues at the Abthorpe and Towcester roundabouts. However access south-bound on and off is completely compromised by lack of direct access to the A43, requiring all south-bound traffic to and from the site to go through Silverstone village.</p> <p>Despite the obvious impact of this development on both Silverstone and Whittlebury, little data has been forwarded to planning regarding pollution, pedestrian safety or the impact of the traffic levels on the rural character of those villages. The SPD has failed to adequately request this information, this should be required for any development at AL4.</p> <p>The whole point of the A43 being dualled, and Silverstone village being by-passed, was to remove heavy traffic from the village. This development raising as it does, the spectre of HGVs yet again running through the centre of this rural village is a very retrograde step.</p>		

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		<p>Applications for the AL4 site need to provide evidence of cumulative impacts on the wider road network and key junctions/roundabouts as well as assessing the local impact of increased traffic arising from the development proposed.</p> <p>6.65 I would request that the maximum development height for AL4 should be 7 meters, not the 10-15 metres referenced. This is due to the local topography and the site's position in open countryside on rising land away from it to Whittlebury in particular. Capping at this height will help to limit the site's impact on Silverstone village, nearby Whittlebury (probably even more directly affected by the visual impact of the development) and Abthorpe. Linked to this, and because of the sweeping topography in the area, I would also request that there should be more sensitivity receptors, for instance from Abthorpe.</p> <p>I would also ask you to consider that the maximum unit size for this development, given the access difficulties and other constraints, should be the existing development (1200m<sup>2</sup>) and Silverstone Fields (2,500m<sup>2</sup>). It is understood that the justification for AL4 was linked to the technology opportunities presented by its proximity to Silverstone circuit. If that is the case then there should be no need for warehousing, for which there is little or no demand from this type of highly advanced manufacturing. If indeed warehousing is needed to facilitate businesses at the Circuit then it should be located next to the circuit itself.</p> <p>6.66 please remove this section and in particular the reference to large buildings for the reasons stated earlier in this response.</p>		
SPD14 2	Paula Chaplin	<p>Supplementary Planning Guidance</p> <p>Although this document is welcomed for some clarification of guidance on future developments, the AL3 development is excluded from this document because of the decision made on</p>	Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their	Additional wording will be added to the SPD to reflect the

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		<p>27<sup>th</sup> January 2022. Surely any future proposed changes to AL3 should be included in the SPG?</p> <p>The decision for the AL1 (DHL) development is due to be made in September. Can you provide assurance that this decision will not be made until after the SPG is published?</p> <p>I am given to understand that Barton Wilmore has been appointed by WNC as consultants to develop the SPG document. They also act for IM Properties and DHL. Surely this is a conflict of interest?</p> <p>We have no clarification as to the size and height of the proposed buildings. We were given to understand in the Local Plan 2 that any development would be of small and medium size only.</p> <p>As has been stated many times by the Parish Council and individual residents of Tiffield, we are extremely concerned at the total lack of understanding or willingness to understand the effects that the 3 developments will have on local traffic. So far the traffic studies have been for the individual developments which will not show a true picture of the volumes once all sites are developed. As a village we are primarily concerned at the extra traffic movement coming from AL3, which IM Properties have sought to deny from the outset. Add to this AL2 and AL3 and I hope you can appreciate our fears! Tiffield and Caldicote are prime candidates for cut-throughs and rat-runs that will inevitably occur to avoid the traffic build up at the A5/A43 roundabout. Yet wherever we turn, our fears are dismissed. Referring to AL3, are there any proposals for solar panel roofing?</p>	<p>submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>need to mitigate against the impacts of climate change. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general</p>



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				principles set out in the SPD.
SPD14 3	L Ratcliffe Yardley Gobion Parish Council	<p>The stated aim of the South Northants Local Plan Part 2 was to identify sites that would be for small and medium sized local businesses. The Council was well aware of the strategic location of the area and the attractiveness of this to the logistics industry.</p> <p>We consider that no one single building, including parking bays etc. should take up more than 15% of the total space as allocated in the Local Plan. This will continue to keep the focus on the small and medium sized companies and also prevent the combining of smaller units in the future. The SPD has added 'large units' and defines them as 8,000 sqm with no limit, which is clearly unacceptable. 5,000 sqm is the maximum acceptable footprint on any site and is the local precedent. The height of the buildings is not specified or limited, rather the SPD seeks to use landscape and topographical features to try to set limits. Residents will want to see height limits set. Some of the proposals have alarmed residents as to the heights proposed. We accept that there are things that can be done to lower the ground levels and therefore reduce the impact as the measurements are from that platform and not from the existing ground levels. The use of bunds is common in South Northants to give both acoustic and visual screening. The SPD should set out that if using treelines etc. to set heights, that bunds with tree planting on top are not a justifiable way to make a ridge height acceptable in planning terms.</p> <p>No building should be taller than any existing building on or in close proximity to the site. For AL5 (Furtho Pit) the existing storage warehouse (Emmett's) should be the reference point,</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Strengthening wording has been added to the SPD to ensure that issues such as noise</p>

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		<p>the Wolverton Mill area which is in the Milton Keynes municipal area does overlook it and is a reasonable reference.</p> <p>The SPD does not give any guidance on the traffic issues that many of these AL sites could give rise to. We accept that any planning application must be accompanied with appropriate traffic surveys and mitigation proposals, nonetheless some guidance would be welcomed. Many residents are concerned as to the traffic impact of some of the proposals that have been submitted. The cumulative impact of these, especially along the A43 and A5 and A508 does need to be addressed. AL1, AL2, AL3 and AL4 are all along the A43 corridor. However, AL5 may impact those, and these four may also impact AL5. Any traffic leaving AL5 with a route that involves the M40, may take the A5 towards Towcester or the A421 towards Buckingham and Brackley and then join the A43. This will impact on the movements generated by the AL1 to 4 proposals.</p> <p>The SPD should state some indications as to what a full and comprehensive traffic survey for each of these allocations would be to include the cumulative impacts and the consequences when the M1 has issues and traffic migrates to the A5 and A508. For example, approximately 9 miles along the A5D at Fenny Stratford there is currently under construction 2m sq ft of warehouses. Some of this traffic will use the same stretch of the A5 that would be required for access to the AL5 Site. This needs to be included in such a survey.</p> <p>There would also need to be some reference to the times when the A5 and A508 serve as the alternative routes to the M1. This is becoming a more frequent occurrence with at least an incident every couple of weeks. The traffic assessment must acknowledge the strategic role of the A5 and A508 when there are issues with the M1 via road works or traffic accidents.</p>	<p>be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>and light are considered as part of the planning application process. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment</p>

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		<p>AL5 will impact considerably on residential properties on Stratford Road in Cosgrove, which has a row of homes that overlook the northern edge of AL5. This is acknowledged in the SPD which mentions that it needs to be handled sensitively. It may be more for the planning department to set out and add conditions as to hours of use, light, odour and noise pollutions. The SPD should give some indications that 24-hour working, or light or odour polluting operations along the road will not be permitted. The type of conditions that the council would be seeking would give clarity to both residents and the developers. On this site it is concerning to note that the documentation that was used to promote the site with indicative layouts showed the entrance off the A5 roughly in the middle of the site. The screening opinion, recently consulted on, gave insight to the developers most recent thinking, and showed this entrance much further up to accommodate a 350,000 sq feet enormous warehouse on this site. The road, in its original position, was through this proposed building and therefore prevented it.</p>		<p>in line with the general principles set out in the SPD.</p>
SPD14 4	M Djahanbaksh	<p>I am writing to voice my grave concerns about the above development (Shacks barn &amp; Bell Plantation and Woolgrowers field). All of these developments increase traffic and congestion (on top of the already highly congested Tove round about which backs up traffic to A413 Silverstone and A43), air pollution, noise pollution and light pollution. The structures are very high which means trees will not cover them. A43 was built to take traffic away from Silverstone village but this (in specific (Shacks Barn development) will bring it back to A413. It will increase risk of accidents, reduces neighbourhood safety, reduces environmental sustainability. The traffic will be 24x7x365 which will destroy our village life and its peaceful enjoyment. A413 roads and Silverstone village are not designed for such increase in traffic of HGV's. Silverstone village already has more than its fair share of traffic, noise and air pollution,</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	<p>No changes necessary.</p>

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		reduced health and safety issues from Silverstone Race Track events and this (Shack Barn development and others) will be the straw that breaks camel back! Approving these plans will be a catastrophic regret in years to come for all those who were involved in approving it!	impacts on the roads would be severe.	
SPD14 5	Wendy Maxwell	<p>I was extremely disappointed to receive notification of amended plans for this planning permission. My original comments in support of opposing this development still stand, however I now understand that similar local developments are also included within the supplementary planning documents.</p> <p>I oppose all of these developments for the following reasons:</p> <p><b>TRAFFIC</b></p> <p>Towcester is already very busy, most days of the week. These developments will bring additional traffic to an already over congested area. I believe a cumulative traffic assessment should be carried out for ALL sites, they should not be assessed in isolation.</p> <p>The A413 through Silverstone is already used as a rat run when there are issues on the surrounding roads. We do not want to go back to the days before the Silverstone bypass, when HGV vehicles were coming through the village at all hours of day and night. I remember the noise, pollution and disruption that was caused. Please do not allow this to return to our village. It is not suitable for a road next to a Primary school.</p> <p><b>BUILDING FOOTPRINTS</b></p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>The original Local Plan allowed for small and medium sized units, the new draft SPD introduces large units which is very concerning. These large units are much bigger than the units at Silverstone Circuit and it is important that any units which are granted permission are a suitable size for the location. A maximum of 5,000m<sup>2</sup> is preferable, if something bigger is needed then these locations are NOT suitable and should be placed in a different location. Towcester/Silverstone is not a City. Such large units are more suitable next to a motorway, not in the middle of a town.</p> <p><b>UNIT HEIGHTS</b></p> <p>Similar to the size of the units, the same principle applies to the height of the units. 16 metres is far too high for an area such as this. The highest local building is currently 9.5m, extremely lower than those proposed. Any buildings over 10m will be seen for miles and no amount of planting will hide them. Again, if this height is needed it should be placed in a different area where there is no local community (ie next to motorway).</p>	<p>heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	
SPD14 6	Elizabeth Holt	<p>I have just studied relevant sections of these planning proposals, particularly those concerning Site AL4, I would like to make two comments about this site's proposals.</p> <p>Under Assessment and Evaluation, Point 6.65, it reads: "With no direct southbound slip road access onto the A43, alternative southbound access is provided via Silverstone." I wish to take exception to this proposed solution on the grounds that the A413 that passes through Silverstone Village is not wide</p>	<p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation</p>	No changes necessary.

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		<p>enough to carry heavy-duty lorries, especially at the double-mini roundabout located at the zigzag junction of the A413 and Whittlebury Road. This roundabout does not appear on the site maps in this consultation because the map stops north of it.</p> <p>The second reason for my objection to this route is because it passes in front of, and close to, the new Primary School. This would present a danger to life and limb to both parents and young children.</p> <p>Therefore, I would like to respectfully suggest that a dedicated slip road from the Shacks Barn site onto the A43 southbound be built. Otherwise, lorries should be required to turn right upon leaving the AL4 site, using Whittlebury Road towards the Village of Whittlebury, as their southerly route.</p>	<p>implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. There are no proposals to create a further slip road onto the A43.</p>	
SPD14 7	Prue Young	<p>When we are asked to consult on the Local Plan in about 2013 , we , living in the local villages, concentrated on our immediate area of concern and trusted that others, more aware of the urban areas in our district would take care that the towns were protected, the roads protected for through and local traffic and that our environment would be protected from unnecessary and unsightly development.</p> <p>We should have known better.</p> <p>These current proposed changes to the Local Plan , known as SPD, only serve to underline how badly we have been served by local officers and, by omission to their overseeing role, by our elected councillors.</p> <p>Now we are threatened by enormous changes to our area and eventually our whole way of</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>With regard to building heights and skylines, this has been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken</p>

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		<p>life.  South Northamptonshire, where I have lived all my life ( ) used to be a predominantly rural area served by three main market towns , Towcester, Brackley and Daventry. The M1 brought people to the county, but mostly they drove through it on their way somewhere else. We lived quietly , a life we enjoyed and we flourished.  Things change. But we really do NOT NEED these new massive warehouse buildings all along our main routes.  They will  a) ruin the skylines from all approach roads to Towcester and along A43 to Brackley. All the proposed warehouse are TOO BIG, unsightly and UNNECESSARY - there are huge developments only a few miles away at Northampton, Weedon and Harlestone. Soon there will be the massive Rail Freight terminal at Milton Malsor. WE DO NOT NEED ANY MORE.  b) impact on the lives of all new and old housing in Towcester by dwarfing the town as a centre of activity and employment  c) hugely increase TRAFFIC in and around Towcester - and as escape and avoidance routes, the local backroads and villages. The new ring road will be constantly clogged by lorries and delivery vans aiming for the warehouse industrial site. Every time there is an incident on the M1 the A5 is instantly stationary with diverted traffic - with hugely</p>	<p>be undertaken to best shape a proposal for each site.  The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.  As part of the planning application process, any adverse impacts on the environment will be taken into consideration.</p>	<p>to best shape a proposal for each site.</p>

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		<p>increased local traffic movements these situations , which occur frequently , this can only get worse.</p> <p>Any employment allocations ( or 'jobs' as they used to be called) will have to be given to people being brought into the area - there is very little UNEMPLOYMENT in Towcester, so the jobs are not needed. This will unnecessarily increase TRAFFIC at key times of the working day, making it more difficult for people delivering children to schools and getting to work in the town. In Corby, workers in warehouses have to be bused in. They sleep in converted containers during the week and are bused out again at the weekend. We DO NOT WANT this happening in Towcester.</p> <p>It was foolish ever to have suggested or allowed or to have been influenced by developers to agree to warehouse development on ANY OF THE PROPOSED SITES. But, it having been agreed, we should only have SMALL, INDIVIDUAL( NOT JOINED) BUILDINGS DESIGNED FOR TECHNICAL BUSINESSES.</p> <p>Only those receiving financial gain want these developments. As a local resident I know I am speaking for many when I say WE DO NOT NEED OR WANT OUR ENVIRONMENT DESPOILED in this way.</p>		
SPD14 8	Les Glassock	I have read the draft Employment Site Allocations Development Brief Supplementary Planning Document (SPD) with great interest. While it provides a comprehensive analysis of some of the items of concern to	The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). The employment allocations were identified to meet local demand and	which are identified will need to mitigated to the



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		<p>the residents affected, it is almost silent on the rationale behind allowing large scale warehousing development and any action proposed to mitigate the traffic impact on surrounding villages.</p> <p>Large Scale Commercial and Warehousing Building: My first objection is to the proposal to widen the range of permitted warehousing to include large warehousing units which is beyond the currently defined policy direction. As you may know, this is limited to small and medium sized units, as described in the South Northamptonshire Local Economic Assessment (SNLEA). The grounds for my objection are set out below:</p> <p>1. Allowing large scale warehousing is unlikely to meet the policy objectives for local employment as increasing automation is the defined strategic business goal of most major distribution and warehousing operators, including DHL, the world's second largest by revenue. Their intention is to reduce full-time employment to a minimum. In DHL's published 'Strategy 2025' they make clear that "automation of operations<sup>2</sup> is a key driver. See slide 19 from their June 2022 presentation to investors reproduced below. Slide 19: DPDHL-Alliance-Bernstein-Management-Roadshow-2022-06-22 DHL make clear what Automation of Operations includes later in their presentation. It refers to 12 core technologies all of which are designed to replace people with machines within their supply chain as shown in slide 43 of the same presentation – see below. The company makes clear that automation applies to</p>	<p>strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. which are identified will need to be mitigated to the satisfaction of the decision maker. Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process. Construction Management Plans will be secured through the planning process.</p>	<p>satisfaction of the decision maker. Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

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		<p>physical operations robots for picking, wrapping, transport, stock management and ultimately, delivery. Alongside these 'back office' operations too are to be automated – process control, data analytics, asset tracking and so forth.</p> <p>Slide 43: DPDHL-Alliance-Bernstein-Management-Roadshow-2022-06-22</p> <p>The SNLEA's goals are summarised as “to increase the number of jobs so that its resident population could remain within the local area for work and help to increase spending within the associated settlements and thus contributing to their improved vitality and viability”. The evidence suggests that, given that automation is embedded in DHL's 'Strategy 2025', the medium-term outlook for a contribution to the SNLEA local employment objectives is not commensurate with DHL's proposed footprint on any of the Economic Site Allocations, particularly AL1, as proposed. In simple terms, they will take up a lot of space and deliver fewer and fewer jobs over time.</p> <p>Would it make any difference to employment if DHL was replaced by a different large scale logistics company? Probably not. DHL are not alone among the Global Top 10 Logistics and distribution businesses intent on automating their operations. UPS, the #1 by revenue, plans a “Global Smart Logistics Network optimizing a data-driven end-to-end global integrated network “applying automation. FEDEX has a similar business strategy using similar automation technologies named “Deliver Today; Innovate for tomorrow”.</p> <p>This plans to “enable a collaborative network and quality returns through advanced digital systems”.</p>		

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		<p>Whichever large scale logistics partner occupies space on any of the SNLEA sites is likely to follow a similar business path: replacing people with automation. So, my argument is that the local employment case for large scale warehousing at Towcester will become progressively weaker while its environmental and opportunity costs will increase over time. By environmental costs I am referring to the incremental impact on traffic and pollution of a 24/7/365 distribution centre. By opportunity costs I am referring to a large allocation of productive economic land producing progressively fewer employment opportunities for Towcester. My conclusion is that the local employment case for large warehousing and distribution units is weak and should not be followed. Towcester is likely to receive greater employment benefits for longer if only medium and small units are constructed. These can be restricted in footprint and height to those of similar sized buildings already built without compromising their operational efficiency which is 5000m2 and a height limited to 10 metres AOD.</p> <p><b>Traffic Analysis and Calming Measures</b></p> <p>My second objection is that the report is silent concerning the impact of increased traffic on the surrounding villages and the A43/A5 and includes no specific measures to analyse the impact of the developments on traffic and air quality nor does it suggest traffic calming measures.</p> <p>While the charity Sustrans has its critics, few would argue with its information sheet "Traffic calming measures for minor rural roads" published in 2004. Sustrans made the case that minor rural roads need to</p>		

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		<p>be kept safe for walkers, cyclists and horse riders, be they residents walking to shops and work-places or children cycling to school or leisure facilities. They make the point that people will only walk along a minor rural road if they perceive it as safe. Having recently moved from Oxford I have experienced how significantly and quickly traffic volumes, speeds and accidents can rise in villages and hamlets peripheral to commercial developments. Clearly, it is easier to maintain people's trust in road safety than to regain it after a tragic event. Nottingham County Council's comprehensive paper "Traffic Calming: design guide", of the same vintage as that of Sustrans, makes the simple point that reducing road speeds and reducing unnecessary traffic, such as villages and lanes used as 'rat runs' reduces accidents and injuries.</p> <p>My argument is not that commercial development should not take place; it is that detailed traffic analysis should form part of the development schedule. It should precede and follow it. In addition, where construction traffic is highly likely to have an immediate impact on local villages and hamlets, traffic calming measures should be implemented pre-emptively during the construction phase</p>		
SPD14 9	Ken Pritchard	<p>After viewing the response document and refreshing myself with the original SNC Local Plan Part 2 I have the following comments as follows.</p> <p>SPG – Purpose ,firstly what weight would the SPG have when a potential developer decided that they would want to engage with variations not covered by the Part 2 and the eventual approved SPG. Also if it went to appeal would the inspector be able to 'disregard ' the agreed SPG and approve the appeal.</p>	<p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications.</p>	<p>Additional wording has been added regarding AL3 to set out that alongside revised planning</p>

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		<p>After all the SPG is a guidance document and cannot change any policies contained in LP Part 2. Without rewriting it. Scope. With the case of AL/5 the LP part 2 page 135 par 3.a it states that 'B1, B2 and B8 use should be complimentary and subservient and complimentary in both scale and nature to existing or proposed uses'. This also would apply to AL 1/2/3/4/. Does the SPG cover this?</p> <p>Sizes, None of the proposed plans would, in my opinion be described as small /medium particularly the B8 content. . Should consideration be given to establishing an additional category from 8000m2 maxing out to 15.000m2 not just 8000m2 with no limit. I appreciate that the LP part 2 did state that all, of the AL's would be for employment purposes but B1 has disappeared and B8 has become the norm</p> <p>Local Employment. South Northants has one of the lowest unemployment statistics and these new logistics projects will be encouraging employees from much further a field . So much for local employment. When you consider the demand for this type of B8 employment with(MK jnt 13 plus Fenny Stratford, The DERV. Roade RFT) will be considerable. Not always highly skilled.</p> <p>Road Traffic. Have precise traffic surveys really been conducted particularly taking in to consideration at Towcester AL1/AL2/AL3/AL4 and the traffic generated on the A1 at Old Stratford. The RFT at Roade will be generating 26000 traffic movements per day. ( A43/A45/A508/A5) additional B8 traffic from Towcester will certainly not improve traffic flow . Even when the Towcester Link road is completed. Has the potential of the 'Blue light Centre' at Woolgrowers been considered</p> <p>Building Heights . All new building structures should not be taller than their local neighbours in the vicinity. In the case of AL5 due consideration should be given to existing housing .</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The SPD may be reviewed in the event that AL3 needs to be included. Any conditions will be attached as part of any planning approvals.</p>	<p>applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>AL3 (IM Properties) In the case of AL3 why has this been 'outside ' of the SPG? If it has been approved outside of the SPG what stops the developer putting revisions or increasing the size of dimensions or the amount of the B8 structures.? Potential Growth.- Has any consideration been given to the Spatial Strategy and other potential extensive housing growth particularly around Deanshanger /Old Stratford.</p> <p>Timing I gather that one of the remaining AL projects will be coming to the Strategic Committee for outline approval middle of next month ( August) . Can this and other projects be delayed until the SPG gets approved by the PPC. IF not what is the situation if projects were approved by the relevant planning committee would they be subject to the SPG conditions ( recommendations).</p> <p>As I stated earlier all these AL's are part and allocated for growth via the LP part 2 but we have to be able to determine what sort of growth. Will the SPG be able to control this if not what is the point of having and SPG in place?</p>		
SPD150	Chris Hart	<p>In short, our main issues are over the height of the proposed warehouse units which far exceed those already built in the local area and which would be an eyesore to the local community and where no amount of planting would be able to camouflage the 15m high structure or the light pollution that the buildings would emit. This would have a devastating impact on local residents and detract from the beautiful surrounding countryside.</p> <p>Second, from someone who has worked within the warehousing &amp; distribution industry for many years, by their nature, warehouse units are not profitable by the simple storage of products alone, there needs to be a high throughput of such products into these warehouses at all times. High throughput equates to large vehicle</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be</p>

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		<p>movements in to and out of the site. Going “northbound” on the A43 toward the M1 would mean additional congestion at the two roundabouts at Towcester even without the added impact as a result of the proposed development at the Bell Plantation by DHL. With these proposals, the congestion will be immense and would impact all road users and local residents with untold delays and pollution.</p> <p>Even more of an issue, is that the movements going “southbound” on the A43 toward Brackley and the M40 and those coming to the site from the direction of the M40, would use the A413/Towcester Road through Silverstone itself. This would have devastating impact on local residents and the village itself in regards to noise, emission pollution and general road safety. As I’m sure you are aware these vehicles would be passing Silverstone Primary School which can not be acceptable. I note that the developers and their agents make reference to the fact that their proposals are less than design &amp; potential maximums. We find this argument perverse and of no consequence at all. It pays no concern as to the impact on local residents and what is best for our community. In summary, we oppose the development as it stands and believe it is flawed and will have detrimental impact on the health and wellbeing of residents with minimal benefits to those same people. We are experiencing the ongoing development at the Silverstone Circuit and do not see any further development justification at Shacks Barn.</p>	<p>to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	<p>undertaken to best shape a proposal for each site.</p>
SPD15 1	Derek Everett Cosgrove	<p>In addition to the support for Cllr Ian McCords response dated 30 July 2022 Supplementary Planning Guidance AL5 Response by Cosgrove Parish Council</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p>	<p>The SPD will be amended to confirm that</p>

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	Parish Council	<p>Response to Supplemental Planning Document Part AL5 Contextual:  Why does this document put great emphasis on the Ouse Valley Parkland at Old Wolverton Mill and Old Wolverton?  In AL5 the document states small to medium scale units the dimensions state small 220 M2 and Medium 7,150M2 But on the footprint size of the Small units it states 250 M2 Medium units 8,000M2. Is this to give developers the opportunity to increase the size above that stated AL5 which is of great concern.  Employment site allocation development brief:  With large scale warehousing developments and distribution businesses, employment opportunities are of unskilled or semiskilled levels.at the lower end of the qualification level NVQ 4 Level outlined in the Planning Document, so employees are likely to come from outside the local area  Visual:  Why are there NO maximum heights for the warehousing units, as this height shown in AL5 outline will have a massive visual impact, not only on visibility from the A5 roundabout also on the Stratford Road in Cosgrove. If this was planning brief for domestic properties then the phrase Incongruous to the Street Scene would surely hold true with such high buildings as warehouses dominating the landscape.  Should the SPD provide guidance on the types of materials to be used in the types of</p>	<p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be</p>	<p>the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change. Wording has been added to the SPD in line with Environmen</p>



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		<p>buildings as well as their maximum heights?  Development:  Zero Carbon.  In the light of high density warehousing and distribution developments how can this be shown to promote zero carbon footprint due to large scale vehicle movements? It should be mindful of the expected 180,000 daily vehicle movements at the rail freight gateway terminal at junction 15 of the M1. Unless all these extra vehicle movements are to be done by electric vehicle the zero carbon footprint is not achievable, merely planting thousands of trees is not the full answer to achieving zero carbon footprint. The document talks about reducing the need to use private transport and to promote a more sustainable public transport system. AL5 is situated some five to six miles to the nearest railway station and three to four miles from Milton Keynes. At present there is little or NO public transport to interconnect between either of the two aforementioned places.  For Companies to fulfil their employee requirement they will have to recruit from outside of Cosgrove and Old Stratford catchment area, which will mean transporting into the area adding to the volume of traffic in the Old Stratford area; this also damages the zero carbon footprint.  Flooding:  The document recognises that there is a flood plain site within the AL5 development. The</p>	<p>consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.  As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include heritage considerations.</p>	<p>at Agency advice.</p>

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		<p>large 16 hectare site will generate vast volumes of run-off water and one have to assume that this would be directed to this flood plain area, the volume generated during a rain storm delivering one inch of rain would generate some 27 million gallons of run-off water and again it must be assumed that there will be attenuation lakes and ponds to cope with volume of run-off water. If the surface runoff water is allowed to flow into the Dogs Mouth Brook this will produce flooding not only to the already stated flood plain, but may generate a new flood plain within the AL5 development site, it should be remembered that the Dogs Mouth Brook passes through the AL5 site and leaves via a 1.5 X1.5 meter brick lined culvert passing under and through the Buckingham Arm canal. Reference to the recent (xmas 2000) damage caused to the residents of neighbouring Cosgrove, Stony Stratford and Deanshanger parishes.</p> <p>Sewage: Sewage waste from this AL5 will have to be disposed of into old antiquated systems developed in the 1950's. These are not suitable for such a large scale development as AL5. Some 10 meters from the brick lined culvert there is a large open Anglian Water sewage outlet which on many occasions, throughout a year, runs raw sewage directly into the Dogs Mouth Brook. Evidence of this can be seen downstream of the brick lined culvert, where</p>		

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		<p>toilet paper and sanitary products can be seen hanging from the vegetation and when this open sewer culvert is running the colour of the Dogs Mouth Brook looks like raw sewage.</p> <p>Land Use: The inclusion of open countryside fields adjacent to Furtho Pit appears folly for land to be used for this warehousing development.</p> <p>Transport Access: Traffic surveys: The Supplementary Planning Document (SPD) does not provide any guidance on traffic issues that many of these AL sites may give rise to, it is understood that any planning application must be accompanied with appropriate traffic surveys and mitigation proposals, nonetheless some guidance would be welcomed. The cumulative impact of the AL sites along the A5, A43, and A508 must be addressed. Guidance should be given that West Northamptonshire Council would expect to see that traffic surveys will show that all of these AL sites will have impact from all of the AL sites. AL1 to AL4 are along the A43 corridor, however, AL5 may have impact on this road corridor also. Any traffic leaving AL5 with routes to the M40 may use the A5 towards Towcester or the A421 towards Buckingham and Brackley and then join the A43, this will have impact on the movements generated by the AL1 to AL4 proposals. Some guidance should be given as to the scope and how exhaustive any traffic survey</p>		

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		<p>should consider would be very welcome, e.g. approximately 9 miles along the A5D at Fenny Stratford there is currently under construction of 2 m2 ft. of warehousing; some of this traffic will use the same stretch of the A5 as would be required to access the AL5 site, this should be taken into consideration.</p> <p>It is also well documented that much of the traffic will end at a pinch point in Farthinghoe, in the South of the county, which goes via the A422 towards Buckingham and Brackley, creating the need for a village bypass at Farthinghoe.</p> <p>Some reference should be given in the guide to times when the A5 and A508 serve as an alternative route to the M1, this is becoming a more frequent occurrence with at least an incident every couple of weeks. The traffic survey/assessment must acknowledge the strategic role of the A5 and A508 and Old Stratford roundabout when there are issues with the M1 via road works or traffic accidents.</p> <p>The SPD should state some indication as to what a full and comprehensive traffic survey should cover for these allocated sites and to include the cumulative impacts and the impact when the M1 has issues and traffic mitigates to the A5 and A508.</p> <p>Transport access to the AL5 site will be via a new roundabout, which is to be sited some 500 Metres from the A5 roundabout already identified by West Northamptonshire Council as a traffic pinch point. It is rumoured that this will</p>		

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		<p>change to traffic signalled T junction</p> <p>Heritage and Conservation:  We are somewhat perplexed to see that this document keeps discussing the site heritage as being the Motte and Baily Castle, deserted village and Monastic grange at Old Wolverton, these references occur several times and these sites are some 3 to 4 miles from AL5; whereas the conservation area within and around Old Stratford and Cosgrove is less than half a mile from the AL5 only get a cursory mention, what is the rationale for this?</p> <p>AL5 Impact on Residential Properties – Stratford Road, Cosgrove and Black Horse Drive, Old Stratford  Stratford Road and Black Horse Drive homes that overlook the northern and western edges of the AL5 site. Whilst it is acknowledged in the SDP and mentions that it needs to be handled sensitively.  This may be more for a planning application to set out and add conditions as to hours of use, light issues, odour and noise pollutions. The SDP should give some indication that 24 hour operating times or pollutions along the road will not be permitted. The type of conditions that the Council should be seeking would give clarity to both residents and developers.  The SDP should give an indication as to the type of conditions the Council would seek to impose on the units near to residential properties on the AL5 site to prevent noise,</p>		

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		<p>light or odour pollution also the conditions for the hours of operation.</p> <p>We have also had sight of the comprehensive response from Cllr Ian McCord the former Leader of South Northants Council at the time of the South Northamptonshire Council Local Plan Part 2 and fully support and endorse his comments</p>		
SPD15 2	Linda Paice Greens Norton Parish Council	<p>This is the response of Greens Norton Parish Council to the consultation on the above.</p> <p>The Council would like to confirm its support for the attached document which it has received via the "Save Towcester Now" group, it highlights the key critical point which the Council has taken from the consultation.</p> <p>The Consultation uses language that is subject to debate and offers the use of "could" or "may" where a more definitive "will" or "must" would give clear route to what is acceptable. Any doubt or debate over terms, heights or sizes would lead to applications pushing the margins or asking for "exceptional circumstances" none of which should be permitted. It is critical that the guidance leaves certainty and structure for all parties specifically applicants as well as local residents. Please refer to Barton Wilmore Review page 68 Purpose of SPD, 1.13 "To provide a robust &amp; clear development framework with clear, specific development principles to inform the preparation and determination of planning applications".</p> <p>It is important that this document, which makes critical comments and guidance, is in force and used in consideration of the outstanding applications AL1-4. It would not be acceptable to have done this much work and the contents be ignored for critical applications that are in progress already.</p> <p>As one of the Parishes critically impacted by the developments AL1-4 there are specific comments around the Consultation that the Council would like to be taken into account.</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p><b>Traffic Management and Pollution</b></p> <p>The Council believes that the road infrastructure around these proposed developments is already over capacity, this includes local as well as national routes. The Council does not believe there is enough attention paid to the impact of development on a cumulative basis on the local roads. It is clear that development will create additional use of local roads as rat runs or diversions and there needs therefore to be evidence provided of the impacts and required mitigations for these impacts. It is also important to consider impact on pathways and provision for people and bikes, not just vehicles. Specifically there are major issues with additional traffic through the hamlet of Duncote, use of the Tove A43/A5 roundabout and the Greens Norton village road from this roundabout. In addition the Abthorpe roundabout and diversions through Greens Norton over a narrow dangerous bridge is likely. There MUST be a requirement for proper consideration of traffic impacts on a CUMULATIVE basis, involving both National Highways and Northamptonshire Highways in concert. It is not good enough for each application to be considered on its own. Consideration should be made of all the ongoing over-development within a 20 mile radius e.g. M1: Junctions 15 - 17 that will impact the traffic volume using A43/AS routes. There is no reference to the provision of HGV parking and facilities for drivers with the inclusion of secure off road parking facilities with toilets and showers. Lorries arriving early or late disrupt the loading facilities and there is a concern this can disrupt the local community. The issue is compounded with HGV bans in specific countries over the weekend and lack of provision for parking in Kent through which the majority will exit, which will encourage European drivers to wait around the vicinity after unloading for the bans to pass, as evident on other local roads around Swan Valley and DIRFT.</p>	<p>to Towcester town centre and preserve its rich history and identity. Strengthening wording has been added to the SPD to ensure that issues such as air quality and pollution are considered as part of the planning application process. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	

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		<p>GREENS NORTON PARISH COUNCIL Pollution</p> <p>The proposed developments are in an area which already exceeds three World Health Organization limits. The addition of logistics will further increase these levels this could directly impact the health of the residents. The following measurements have been taken from the location at AL1 and found 1:</p> <ul style="list-style-type: none"> <li>• PM2.5 - the annual average of the pollutant at this location is 9.87mcg/m3. The World Health Organization limit is 5mcg/m3. PM2.5 can cause asthma, respiratory inflammation and promote cancers.</li> <li>• PM10 - the annual average of the pollutant at this location is 16.05mcg/m3. The limit is 15mcg/m3. Cardiovascular mortality increases by 0.76% and respiratory mortality by 0.58% for every 10mcg/m3 increase of PM10. PM10 can cause wheezing, bronchitis and reduce lung development.</li> <li>• NO2 – the annual average of the pollutant at this location is 13.14mcg/m3. The limit is 10mcg/m3. Long term exposure to even low levels of this toxic gas increases mortality rates and contributes to the development of asthma, and other respiratory issues.</li> </ul> <p>Even PM2.5 (the larger particles) have a radius of 30 miles when blown by the wind which puts the residents of Greens Norton and Duncote at risk of higher levels. These levels will rise with the increase in HGV's and there is no other form of transport to service the Logistics businesses as there are no electric trains servicing this area. A cold starting HGV, low revs with air con on can generate an average of 2.83 PM2.5 (g/hr)<sup>2</sup>. A similar location to the proposal of AL1 at DIRFT pushes air pollution up from Medium to Significant with a notable increase of NO2.</p> <p>Rural Nature</p>		



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		<p>The Council agrees that insufficient weight so far has been paid to the historic rural nature of the area, it is critical to maintain this and there must be constraints on building heights and lighting as the overall visual impact could be disastrous for the long term historic nature of the area. Limits to these impacts with reference to the current structures (eg Screwfix at 9.5m) seems reasonable, additional height, light or visual impact seems completely unnecessary given the local employment that WNS should be trying to create – ie that which is in line with the local skills and needs. There is no value in creating local employment that cannot be filled from the local talent pool. One final concern that may be covered by the Environment Act 2021 is that considerations of the impact of development do not lend sufficient weight to bio-diversity and environmental damage and are usually based on projections and estimates for population/traffic/economic activity which are flawed at best and which use “growth” as a better thing than “sustainability” which on a global basis must be the only criteria to use. Growth is not a concept that can continue forever in isolation.</p> <p>1 <a href="https://addresspollution.org/">https://addresspollution.org/</a>  <a href="https://uk-air.defra.gov.uk/library/air-quality-targets">https://uk-air.defra.gov.uk/library/air-quality-targets</a></p> <p>2  <a href="https://trace.tennessee.edu/cgi/viewcontent.cgi?referer=&amp;httpsredir=1&amp;article=3320&amp;context=utk_graddiss">https://trace.tennessee.edu/cgi/viewcontent.cgi?referer=&amp;httpsredir=1&amp;article=3320&amp;context=utk_graddiss</a></p> <p><b>There is also a copy of the Save Towcester Now Doc attached to this response but have not saved it here as part of response – might need adding in! ALan to advise</b></p>		
SPD15 3	Richard Gladdle	<p>I wish to object to the above proposal on the following grounds :</p> <p>1/ The Shacks Barn location is unsuited for large HGV traffic AND there is NO southbound access to the A 43 meaning that large heavy vehicle traffic will go through Silverstone or Whittlebury and surrounding lanes.</p>	The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>2/ The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit - that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p> <p>The size of buildings, already granted permission on the nearby Tiffield lane development, will be used as a precedent for similar, or change to similar, large buildings on this site. This is too large and not what is proposed here in the first place.</p> <p>3/ Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn. and should not be used as a precedent. It is Strategic Development, whereas the LP2 allocations are ALL for Non-Strategic Development.</p> <p>4/ The wording of the Overarching Design Principles for determining the appearance of the buildings is currently too vague and open to interpretation by the developers. It needs to be defined and specific - the design of these buildings should be appropriate to the rural location. (The existing development at Bell Plantation would be a good example of this). It is my opinion that the design is not appropriate for this rural location.</p> <p>5/ I am concerned that there is no clarification that smaller/medium buildings cannot be joined up at later dates to form larger units. This should be stated.</p> <p>6/ Not enough tree screening conditions in proposal.</p> <p>7/ The developer of AL4 has already attempted to increase the development site area by 28% through placing</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p>	

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		<p>the drainage ponds outside of the allocated land area. This is of particular importance as all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. I fear the developer is thus being 'inaccurate' in the exact extent of this proposal.</p> <p>8/ Developers need to demonstrate how their development will meet local skills requirements. As far as I can see there is no evidence for unskilled or low skilled warehouse jobs in South Northants. The proposal needs to set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on types of jobs.</p>		
SPD154	Tiffield Parish Council	<p>The Local Plan (2) was voted through by SNC in July 2020 and has led to inappropriate developments being proposed for sites AL1/2/3/4/5. We therefore welcome the introduction of a Supplementary Planning Document by WNC to reduce “uncertainty” and provide “clear guidance on what is expected from future developments”. In response to the consultation Tiffield Parish Council has the following points to make:</p> <p>Potential Conflict of Interest</p> <p>Barton Wilmore has been appointed by WNC as consultants to develop the Supplementary Planning Guidance Document. It has now become public knowledge that amongst their clients are DHL, who have an application for site AL1 and IM Properties who have a permission for AL3. This presents a real and specific conflict of</p> <p>TIFFIELD PARISH COUNCIL</p> <p>2</p> <p>interest and despite a strict Code of Conduct applying to all parties in the planning process, no declaration of conflict of interest has been made.</p>	<p>Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>In many respects this is a helpful observation as this conflict manifests itself in two major flaws to the SPG Document. Firstly, the language used throughout the document is vague and imprecise. For example, on p38 the words 'exceptional circumstances' are used as a bypass for developers to avoid size constraints on buildings and on page 67 there are 'large building mitigation' terms when there should be no large buildings at all. Secondly the omission of AL3 from the whole document is unacceptable, but understandable if seen through the lens of the conflict of interest of Barton Wilmore. They would not wish this to be in the document because it would be to the detriment of their client.</p> <p>Indeed, as it currently stands the SPG Document is a backward step from the manifestly unsatisfactory Local Plan (2) as it actually increases the uncertainty which the whole process is trying to solve.</p> <p>Exclusion of AL3 Tiffield Parish Council objects to the exclusion of AL3 from this document.</p> <p><b>RECOMMENDATION</b> All future development on AL3 should be included within the scope of the SPG Document. This should include any changes, remodelling, extensions, renewing lapsed permissions or changes to the existing planning permission that were granted in the meeting of 27th January 2022.</p> <p>A gun against our heads. From the first mention of Supplementary Planning Guidance, it was made apparent that it could not apply to decisions already made and that the decision on 27th January 2022 to approve IM Properties development proposal, would not be affected by the SPG. We fear that if the DHL development proposal is approved, before the meeting which will respond to the</p>	<p>material planning considerations. Any harm would need to be outweighed by benefits. The SPD may be reviewed in the future.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>Wording 'in part' has been removed. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles</p>

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		<p>consultation on SPG, then DHL will get their proposal though without any supplementary constraints.</p> <p>This is a known but unspoken threat, which now threatens to become a gun against the residents' heads. If we contest the (very unsatisfactory) SPG Document as it currently stands, and as a consequence, it is delayed, DHL will be allowed to build to their appallingly inappropriate plans. This is an intolerable situation and cannot be allowed to continue.</p> <p>TIFFIELD PARISH COUNCIL</p> <p>3</p> <p>RECOMMENDATION</p> <p>The September Strategic Planning Meeting must be cancelled if the SPG is not live. This should be indefinitely extended for all proposed developments on AL1 to AL5 until the SPG is confirmed as a working Policy Document.</p> <p>Small and Medium</p> <p>LP(2) promised the residents 'Small' and 'Medium' sized units only. The Planning Act requires that any Supplementary Planning Guidance refers to existing policies within the plan. Yet the SPG Document blatantly introduces new definitions of size. This is illegal because it contravenes the Planning Act and must be removed from the document before adoption. We already have a definition of small and medium units and this can be further clarified but CANNOT be extended.</p> <p>RECOMMENDATION</p> <p>Only Small and Medium sized units can be accepted on these sites. The SPG Document (page 39) defines 'Large' units as 8,000 sqm to infinity which is clearly unacceptable. This is also inadmissible as it introduces new policy. A definite limit of 5,000 sqm must be the maximum acceptable footprint on any site based on the local precedent. Also, smaller/medium buildings should not be joined up at later dates to form larger units.</p>		<p>set out in the SPD.</p>

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		<p>Height of buildings  We want to see height limits set. No building should be taller than any existing building on a nearby site, for example: for AL1/2 this is site 4 (page 28 of the SPG) and for AL4 this is site 6/ Shacks Barn (page 30). Ridge heights should be no more than 10m for AL1/2, and 7.5m for AL4. This must apply to AL3 for any future development as referred to above.</p> <p>RECOMMENDATION  No building should be taller than any existing building on or in close proximity to the site. For the avoidance of doubt all heights should be stated as above existing Ordnance Survey Contour heights but for the avoidance of doubt AOD.</p> <p>Traffic Surveys  There is a need in the SPG Document for a cumulative traffic assessment, not just an assessment based on the individual proposals. Greater detail is required in the SPG Document of a Cumulative Traffic Impact Assessment on the A5/A43, particularly at the Tove/Abthorpe roundabouts and surrounding local roads. It should include traffic flows after the Towcester relief road is open; when the M1 is closed or has hold ups; the SUE Towcester Vale houses are completed; once AL1 to 5 are operational (to</p> <p>TIFFIELD PARISH COUNCIL  4  include all potential movements of employees), and also, when the Northampton Gateway is completed.</p> <p>RECOMMENDATION  The SPD should give indication of the expectations from a full traffic survey. The current approach of taking each development separately is misleading. A cumulative traffic impact assessment should be provided</p> <p>Effect on the local economy</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The skills and education attainment of Towcester and South Northants are significantly higher than those of West Northants therefore employment emphasis should be on skilled, managerial and professional, high-performance technology, which exploits our rich regional history of applied Research and Development in areas such as automotive advanced manufacturing. B8 risks lowering rather than raising aspirations. RECOMMENDATION</p> <p>Remove 'in part' from page 24 para 3.2 and reinforce the importance of the 5 employment criteria of the LP(2) and its aim "to attract new investment and provide more jobs to match the skills of local people" (page 20) which large scale, B8 warehousing conspicuously fails to meet.</p> <p>I hope that this set of recommendations is helpful and that they will be incorporated into the final Supplementary Planning Guidance Document. Tiffield Parish Council particularly requests that it be kept informed as the document progresses towards adoption.</p>		
SPD15 5	Judith Hodges	<p>SHACKS BARN SUPPLEMENTARY PLANNING.</p> <p>We have lived in ( ) and we are really worried for the traffic which would use the A413 through the village if the Shacks Barn proposal goes ahead. We fought hard to get a bypass through the village and this would put us back where we started, making it unsafe, especially for children and older people to cross the road, cutting the village once again into two parts, plus of course the noise and pollution which would affect us all too. A slip road from the proposed development directly onto the A43 South should be put in place before any of these plans are considered</p> <p>The height of the proposed development is also completely unacceptable, no amount of planting</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>would hide these buildings and would be visible for miles, plus they would be illuminated 24/7.  We did email before and lodged our worry and concern over this issue and now there are also proposed developments for the Bell Plantation and the Woolgrowers Field so again meaning so much more traffic &amp; pollution in this area.  We are not good at filling in forms or expressing our views very well but we felt we needed, once again, to give our voice in some way to urge the WNC to reject these proposed plans.</p>	<p>stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>undertaken to best shape a proposal for each site.</p>
SPD15 6	Liz Crussell	<p>My concerns are concentrated on:  1 Heights of the proposed warehouses and their footprint  2 Traffic flow and congestion of the A43 and A5  3 Current air quality within the Towcester area and its effects on health  4 The claim by DHL that this development will offer employment opportunities to the local community. Hence most comments are applied to AL2 and AL3 tho some reference to AL4/5  5 General comments</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>As a non-technical mere resident, I hope I've understood and applied my comments to the correct sections.  Heights of the buildings and footprint.</p> <ol style="list-style-type: none"> <li>1. The local plan part 2 clearly and regularly sets out the need for small and medium sized employment units.</li> <li>2. There was flexibility for some larger units but currently that's all being proposed. The SPD has defined the large units as 8,000 m2 onwards with no upper limit. So any large development could be acceptable apparently</li> <li>3. There are large warehouses in use and currently being developed all along the M1 corridor. These have good links to the motorway, and are in keeping with their setting. They are often adjacent to other large units. To apply that scale to small market towns and rural settings lacks any sense of proportion and the negative impact on the communities.</li> <li>4. The SPD Cites Swan Valley (p24/25) as a comparator where there are huge units – I understand some of 50,000 m2 – but with 13.1 m heights. This does not seem to be reasonable nor deliver the 'high quality' design principle laid out.</li> <li>5. Yet on p 68 6.25 its suggesting that a height of 16m would be acceptable on AL1</li> <li>6. The warehouses recently built adjacent to M1 J15A have a ridge height of 14m but have, from what I can see, been recessed into the ground to minimise their impact. Even tho they're within the Swan Valley locality already mentioned in 4.</li> <li>7. I guess that's a more expensive construction but don't understand why DHL should have permission to go so much higher in a completely different setting. DHL stated in their public meetings that their business plan is to build in house (tho they took over and used existing warehouses at DIDC at J18). Surely their business needs should not trump local considerations and the setting and the SPD document appears to neatly fit with their proposals. They have held several online</li> </ol>	<p>the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	<p>work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>Wording 'in part' will be removed from the SPD.</p> <p>Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>briefings and in person presentations and are very keen to infer that this is a done deal. Local understanding is that they purchased the land from a farmer so have a much greater imperative to pressure WND planning into accepting what they require?</p> <p>SPD consultation comments EC 150822</p> <p>2</p> <p>8. The heights for sites AL2/5 10-12 m, AL4 10-15m, means that DHL can build higher, and assumes that's measured from ground with no platform?</p> <p>9. Screening and landscaping must be and remain the developer's responsibility – and be meaningful rather than a few trees which may or may not grow to useful maturity and height.</p> <p>Traffic Flow and congestion on A43 and A5</p> <p>1. I was astonished to hear at the planning meeting where permission for AL3 was granted, that traffic flow and cumulative volumes from other proposed large developments within the same vicinity cannot be a consideration.</p> <p>2. The SPD does not give details of how this should be done and the impact it will have on access to and from these already congested roads. This seems a glaring omission given the predicted vehicle movements from DHL – let alone for sites AL3 and AL2</p> <p>3. The A5 is used regularly for night time diversions from the M1, with the resultant constant flow of HGVs. Similarly whenever there are accidents or hold ups on the M1 – and M40 – traffic routinely diverts along both these highways and thru small villages as drivers attempt to find alternatives.</p> <p>4. The Tove roundabout is already dangerous when going north or south from the A43 as the 'shelter' offered from fast flowing lanes on the A43 is limited to 2 to 3 cars or one HGV. This often creates bottlenecks.</p> <p>Air quality and its effects on health</p>	<p>impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include matters of pollution.</p>	<p>planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>1. Recent research issued by COMEAP and reported in the press points toward an increasing evidence that poor air quality and pollution adds to the risk of dementia.</p> <p>2. For many years it was accepted by SNC – and presumably by WNC - that the A5 in central Towcester often exceeds recommended levels. The increase in vehicle movements resulting from all these large-scale developments will not ease this and only add to the problem.</p> <p>3. The suggestion that access to AL2 will be along public footpaths or cycle lanes– all adjacent to the A5 and A43 – for recreation and leisure surely exposes more children and adults to pollution?</p> <p>Local employment</p> <p>1. Unemployment rates are low in the Towcester area.</p> <p>2. Recent surveys show that what was the SNC area has a high proportion of self-employed. It also noted that key sectors for the area are high performance technologies, farming and tourism with a special emphasis on high performance engineering.</p> <p>SPD consultation comments EC 150822</p> <p>3</p> <p>3. As a result of the huge social upheaval caused by the pandemic – nationally multiple sectors are reporting that vacancies and problems recruiting labour are impacting their businesses.</p> <p>4. Recently large warehouses in the vicinity have reportedly considered building accommodation for staff.</p> <p>5. The majority of the workforce in warehousing – even those with robotics – are not highly skilled, relatively poorly paid with shift work as an essential.</p> <p>6. The risk is that the workforce will be bussed in from outlying areas, adding to the traffic volumes.</p>		

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		<p>7. P24 para 3.2 wording 'in part' does not seem to reflect the intention of the LP2 in any way.</p> <p>General comments</p> <ol style="list-style-type: none"> <li>1. The local plan part 2 clearly intends for a mix of small and medium employment units, with some larger if appropriate to the setting.</li> <li>2. This mix is not evidenced by the proposals under consideration</li> <li>3. Once given approval, rigorous requirements to limit any joining up smaller units should be applied so that developers are not able to alter the intended permission.</li> </ol>		
SPD15 7	Nigel Wickens	<p>The intent of the South Northants Local Plan Part 2 was sites for small and medium sized local businesses. The attraction of this area to distribution businesses should not be a priority influence.</p> <p>In consideration: -</p> <ol style="list-style-type: none"> <li>1. No one single building, including parking bays etc. should take up more than 15% of the total space as allocated in the Local Plan.</li> <li>2. The focus should be on small and medium sized companies and prevent the combining of smaller units in the future.</li> <li>3. Large units, i.e., 8,000 sqm with no limit is clearly unacceptable.</li> <li>4. 5,000 sqm is the maximum acceptable footprint on any site and is the local precedent.</li> <li>5. The maximum height of buildings should be specified or limited.</li> <li>6. Tree planting on top of bunds is not a justifiable way to make a ridge height acceptable in planning terms.</li> </ol>	As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.	

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		<p>7. No building should be taller than any existing building on or in close proximity to the site. For AL5 (Furtho Pit) the existing storage warehouse (Emmett's) should be the reference point.</p> <p>8. The traffic impact of some of the proposals are unacceptable. The cumulative impact, especially along the A43 and A5 and A508 could be excessive.</p> <p>9. At Fenny Stratford there is currently under construction 2m sq ft of warehouses. Some of this traffic will use the same stretch of the A5 that would be required for access to the AL5 Site. This needs to be included in all considerations.</p> <p>10. The use of the A5 and A508 as diversion routes when the M1 has blockages / is closed must be part of the traffic assessment</p>		
SPD15 8	Arthur Hlckie (online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Not Answered Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Not Answered Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p>	<p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>The SPD sets out the objectives from the Local Plan 2 and sets the developments in this context.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations,</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?  Not Answered</p> <p>Please provide comments to support your answer:  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered</p> <p>Please provide comments to support your answer:  11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p>	<p>meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Further discussions will need to take place regarding the country park should development proposals come into fruition.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>The land is divided east and west of Old Cosgrove Road. The east section is within the village of Cosgrove.</p> <p>The proposed development is wholly inappropriate for almost every conceivable reason.</p> <p>It contravenes 7 of the 10 Objectives under section 2.2.3 of the SNLP (Part 2).</p> <p>It drives through the outstanding planning permission limited to the western section (quoted as "a mixture of farmland, derelict former (now filled) gravel pit, plant hire testing and builder's storage facility"; what might be referred to as 'brown field') for solely B1 and B2 development which was granted after commentary and revision of the initial application/s - dimensions, increase of traffic on to the congested A508, etc.. It should be noted that previously permission had been refused for a garden centre for similar reasons. What has changed in planning to now allow for B8 development on a site which was considered appropriate only for B1 and B2?</p> <p>The east section is wholly farmland and has never previously been considered for development.</p> <p>While some of the land is designated within Old Stratford, Old Stratford itself is to the south of the raised dual-carriageway A5 and will be largely protected from the impact of the development. It is Cosgrove, a small rural village which will be most impacted and it's rurality destroyed visually and from continuous noise, light and traffic pollution, all of which contravene the Objectives of 2.2.3 of the SNLP (Part 2).</p>		

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		<p>Because of their size warehouses have a significant impact on their location and are (normally) sited well away from villages, certainly not within their boundaries as is the case here with Cosgrove. I wonder whether this wholly inappropriate siting is unique in West Northamptonshire?</p> <p>Ease of access to major routes and motorways is a prerequisite. This is not the case here where access is on to the two-way A508, and within 200 metres of a busy 4 way intersection, while the M1 is 10 miles distant. The A508 is a two way minor, certainly by no means a major, A road, which accesses between the M1 and the A5; at no point between these two is it duelled. It is heavily used (often when the M1 has traffic problems, whether north or southbound, it is used as a diversionary route) and the roundabout at the intersection of the A5/A508/A422 is already a bottleneck with often and daily significant traffic queues. The identified access point is unacceptably close to the A5/A508/A422 roundabout intersection and will severely affect traffic flow.</p> <p>The eastern section of the land, which, is sited in Cosgrove to the south of Stratford Road, is greenfield farmland. The development will 100% do away with this. The land is also clearly visible when entering and leaving Cosgrove and the visual impact of the development will be massively evident.</p> <p>Noise and light pollution will very heavily affect Cosgrove. The more so as the prevailing wind is from the west and south. The value of a Country Park is a highly questionable benefit. Currently it is open countryside greenfield farmland. Due to the A5 dual-carriageway it is only</p>		



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		<p>accessible from Old Stratford via a footbridge over the A5. Old Stratford already has two such amenities to the north and south (Ouse Valley Park) of the 'old' A5 on the border with Stony Stratford. Furthermore, what constitutes a 'country park' and who will be responsible for and guarantee making it into a park, let alone its maintenance, and overseeing of that maintenance, into the future? And what if the owners of the proposed development run into difficulties?</p> <p>Thank you.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: The land is divided east and west of Old Cosgrove Road. The east section is within the village of Cosgrove. The proposed development is wholly inappropriate for almost every conceivable reason. It contravenes 7 of the 10 Objectives under section 2.2.3 of the SNLP (Part 2). It drives through the outstanding planning permission limited to the western section (quoted as "a mixture of farmland, derelict former (now filled) gravel pit, plant hire testing and builder's storage facility"; what might be referred to as 'brown field') for solely B1 and B2 development which was granted after commentary and revision of the initial application/s - dimensions, increase of traffic on to the congested A508, etc.. It should be noted that previously</p>		

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		<p>permission had been refused for a garden centre for similar reasons. What has changed in planning to now allow for B8 development on a site which was considered appropriate only for B1 and B2?</p> <p>The east section is wholly farmland and has never previously been considered for development.</p> <p>While some of the land is designated within Old Stratford, Old Stratford itself is to the south of the raised dual-carriageway A5 and will be largely protected from the impact of the development. It is Cosgrove, a small rural village which will be most impacted and its rurality destroyed visually and from continuous noise, light and traffic pollution, all of which contravene the Objectives of 2.2.3 of the SNLP (Part 2).</p> <p>Because of their size warehouses have a significant impact on their location and are (normally) sited well away from villages, certainly not within their boundaries as is the case here with Cosgrove. I wonder whether this wholly inappropriate siting is unique in West Northamptonshire?</p> <p>Ease of access to major routes and motorways is a prerequisite. This is not the case here where access is on to the two-way A508, and within 200 metres of a busy 4 way intersection, while the M1 is 10 miles distant. The A508 is a two way minor, certainly by no means a major, A road, which accesses between the M1 and the A5; at no point between these two is it duelled. It is heavily used (often when the M1 has traffic problems, whether north or southbound, it is used as a diversionary route) and the roundabout at the intersection of the A5/A508/A422 is already a bottleneck with often and daily significant traffic queues. The identified access point is unacceptably</p>		

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SPD159	Wendy Page (online response)	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p>	There are currently no known Neighbourhood Plans in place which would form part of the development	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>I am particularly pleased to see the protection of rural environments addressed, as well as provision of care home places for the appalling under provision of care in South Northants and the provision of a modern public transport system. These are major reasons why I have felt obliged to arrange to move away from the village of Cosgrove after twenty five years of seeing declines in these provisions.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: I think a further category of VERY large developments is needed to cover structures such as that proposed at Furtho Pits. These plans are well outside of the concept of a large development and in addition, for their size provide relatively few jobs per square foot of spoiled rural environment Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p>	<p>plan against which planning applications will be determined. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>The Local Plan Part 2 was subject to a full plan preparation process which included the legal requirements of Duty to Cooperate with neighbouring authority Milton Keynes.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: I believe that existing similar sites being constructed around Milton Keynes and the M1 already provide the potential required. The obliteration of rural</p>		

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		<p>environment at these sites demonstrates that the proposals of the Neighbourhood Plan are incompatible with the constraints of this site - not mitigated by any potential opportunities. This is an instance of the new city of Milton Keynes stretching outward from its boundaries to engulf Northamptonshire, particularly in terms of loss of rural environment and overwhelming increase in traffic and Highway burdens.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:  The difficulties with Highways needed to support this proposal have been greatly underestimated and take no account of existing plans to increase lorry movement up and down the A508. In Cosgrove we are already told that Highways cannot support safety roundabouts to enable people to move safely in and out of the village, and onward to the A5 or back up the A508 towards Northampton. Again, the AL5 plan directly mitigates against the development of the city of Northampton as a regional centre to enhance the importance of Milton Keynes.</p> <p>On a local level, the proposals for a distribution centre and multiple warehousing units represent a complete underestimation of the environmental impact of such a development in the Old Stratford / Cosgrove area, with accompanying noise, road danger and disturbance to the community - as well as</p>		

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		<p>completely obliterating the centre for youth training at the Quarries Scout camp directly opposite - where young people from both MK and the wider area come at present to have possibly their only rural experience. I would be interested to know how many jobs would be created by a development like this, measured at jobs per square foot of lost open space, compared with similar sized job creation schemes.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>I do not feel that West Northamptonshire can delay any longer in revealing what their "bottom line" limits for further loss of rural heritage and open spaces and increase in traffic movements and burdens on the local Highways is to be. We are constantly reminded to await planning applications from the owners of AL5 land, and it is time that officers and developers began to work together to identify what is actually demanded, needed and acceptable to both parties, and how this will benefit West Northamptonshire as opposed to neighbouring authorities. The Village of Cosgrove in particular is beleaguered by extremely limited access as a cul-de-sac village, pressured by huge increased at the Cosgrove Park end, through traffic at the Castlethorpe turn, restrictions of the A508 as a boundary, and potential internal development by local landowners within the village, as yet unrevealed.</p>		
SPD160	Nic Manners	4 The SPD sets out a number of overarching design principles. Do you agree with these?	The scope of the SPD is to establish general guidance and design	The SPD will be

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No</p> <p>Please provide comments to support your answer: Tighten up the language within the SPD to set limits on building heights to no more than 12metres AOD. Tree planning on top of earth bunds is unacceptable and the trees will likely never to grow well. Tree maintenance must be legally binding. No building should be taller than any existing building on or in close proximity to the site. For AL1 &amp; 2 this the existing Bell Plantation complex , Old Greens Norton Road area and Tove Valley Business Park area; for AL4 the existing units at the Silverstone Business Park give a good reference and for AL5 the existing storage warehouse (Emmett's) should be the reference point, the Wolverton Mill area which in Milton Keynes municipal area does overlook it and is a reasonable reference, the Ouse Valley Park is too far away to be relevant</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer: Restrict the medium size units size to a maximum of 5,000sq/ft unless there are exceptional reasons. Update the guidance to have a fourth category of very large to reflect the strategic logistics settings of the district from above 15,000 m2 giving the large category defined limits. And further design planning changes will not allow these buildings to be joined up.</p>	<p>principles for the allocated employment sites. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The wording relating to frontages onto the A5 and Towcester Road has been strengthened.</p>	<p>amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Having set out that a very large category could exist the SPD should make clear that no very large units would be permitted on any site.</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>Yes the constraints are identified</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>The height and the massing of the buildings needs to be smaller</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>The heights of the buildings need to be lower than 10m, and not dominate the roundabout</p>		

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		<p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>The SPD should make clear that all services and attenuation for say flooding like balancing pools must be kept on site and within the allocation area.</p> <p>The size and height of the buildings need to be limited to under 5000sq/ft and 12 meters in height</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>as per the other sites AL4</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Are there any other comments you wish to make which you haven't already made?:</p> <p>Towcester is an attractive small historic "market town" and in my view any development on Employment Land ought to reflect this. The town has retained its character and recent "in keeping" developments in the town centre have improved the town and added to its amenities. Developments on employment land, if they are well designed can also make a positive contribution. To do so they need to be relatively small in scale and built using appropriate materials.</p>		
SPD16 1	Emily Tye Online Reponse	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: due to the impact on the countryside/wildlife and transport routes in the local area</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: it should only be for small/medium units Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer:</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p>	<p>impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer:</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: i object to the plans due to the impact on the local transport systems, i do not believe there is sufficient infrastructure to cope with the amount of extra HGVs in the areas. I also object to the size of the buildings and the blot and impact this will have on the local countryside/wildlife</p>		
SPD16 2	Julie Lloyd Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: The SPD doesn't appear to consider existing residential properties in the area of AL5. In the area known as Furtho Pit, Old Stratford Parish, existing medium sized unit sets a precedent along with the previous application to locate Ace Plant on the land between Cosgrove Road and the A508. This area is obscured from Old Stratford and has less impact on residents.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Contextual information such as proximity to residential properties has been considered.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will</p>	A glossary will be added to aid understanding of language.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer: The use of size bands is sensible and should prevent developers attempting to propose unacceptable sized units. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer: AL1 is less of a concern to Cosgrove.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: AL1 is less of a concern to Cosgrove. Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer: AL2 is less of a concern to Cosgrove.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p>	<p>need to be mitigated to the satisfaction of the decision maker. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered Please provide comments to support your answer: AL2 is less of a concern to Cosgrove. Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer: AL4 is less of a concern to Cosgrove. 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: AL4 is less of a concern to Cosgrove. Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: AL5 was accepted as a development site by SNC, but without any consultation of residents that are going to be greatly affected by any development in this area. 13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer:</p>		

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		<p>Development in this area has the potential to destroy a village that already suffers greatly from a massive increase in population and traffic during the summer months, with no alternative access to Cosgrove Park. The road infrastructure in this area is barely adequate for today's traffic, with congestion at the Old Stratford roundabout a major concern. With issues experienced when the M1 Motorway has been closed the affect on this area has to be considered before any additional logistic operations is allowed to operate from this area.</p> <p>As I am a resident who lives on the Stratford Road which borders the potential site it would seem likely that future employees will soon learn of the road congestion that already happens along the A508 to the Old Stratford roundabout. In this position Stratford Road could be used as an alternative car park for a quicker journey into Milton Keynes via Cosgrove, Castlethorpe and Haversham which would only produce more unwelcome traffic through these small villages.</p> <p>Any other comments  14 Are there any other comments you wish to make which you have not already made?  Are there any other comments you wish to make which you haven't already made?:  AL5 was sanctioned by SNC, while only stating the area as Furtho Pit which is in Old Stratford parish. The inclusion of land in Cosgrove parish was introduced without any supporting communication to make it clear that the proposed area had increased dramatically and will impact on residents.</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Consider better communication with parish councils and particularly residents who live in the vicinity of AL5. The welfare of people must be a high consideration and being a resident who will live close to the proposed site from the conversations I have had with other Stratford Road residents who live even nearer to the site, the fear of what may be is having a detrimental affect on our health and well being. Keeping all residents better informed and using language that people understand must be of the highest priority.</p>		
SPD16 3	Christine Wells Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Not Answered Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Not Answered Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The SPD has been</p>

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		<p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: There are a number of issues:</p>	<p>need to mitigated to the satisfaction of the decision maker.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>amended to reflect comments from the Environment Agency.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>1. Traffic. The Old Stratford roundabout is already a pinch point for traffic and this increases when there are issues on the M1. There would be an increase in noise, light pollution and a major impact on local wildlife and green belt. The building of warehouses at Bletchley an Jct15 of the M1 along with many thousands of houses along the Watling St (Towcester, Stony Stratford etc) will add to the problem.</p> <p>2. If any application is approved it must blend in with the landscape- both in size and design. Warehousing would be too large for a village area and provide little employment and be of disproportionate scale. Any building on the Stratford Road MUST be low level and set back from the road.</p> <p>3. Flooding is already an issue in the village and this can only increase with more land utilised for buildings. Sewage problems are also likely to increase with the old sewage system already overflowing into the feeder stream for the Ouse during heavy rain.</p> <p>4. The area in question is used by many pedestrians and cyclists as a safe route into Stony. Existing public footpaths and bridle ways would therefore require retention - any development would impact on their use and enjoyment.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: See above. Any other comments</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>14 Are there any other comments you wish to make which you have not already made?            Are there any other comments you wish to make which you haven't already made?:            The Swan Valley units which have been used as a reference for large units are inappropriate as they are abutting the M1 and the A508/Cosgrove area is clearly residential.</p>		
SPD16 4	Jill Stillman Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?            No            Please provide comments to support your answer:            N/A</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?            No            Please provide comments to support your answer:            N/A            Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?            No            Please provide comments to support your answer:            N/A</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?            Not Answered            Please provide comments to support your answer:</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>N/A Your comments about Site AL2 - Land at Woolgrowers Field, Towcester 8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer: N/A 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: N/A Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer: N/A 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: N/A Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p>	<p>the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No Please provide comments to support your answer: Proposal allows for large warehousing that is incompatible with a rural village site. The need for employment opportunities is accepted, but what is required for this area is small to medium development for office space and start up business utilised by Cosgrove residents and residents of the surrounding villages. Large warehousing will not satisfy this need and will require employing people from outside the area with the inevitable increase of traffic on already overcrowded roads.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The road system is already inadequate for purpose. The A5 and A508 cannot support the current traffic load with long queues during the morning and evening rush hours and gridlock at the Old Stratford roundabout whenever there is a problem on the M1 or all or part of one of the roads is closed. Problems with diversions from the M1 are a regular occurrence. These problems will only increase when the development currently under way at the Fenny Stratford end of the A5D becomes operational and traffic from the site uses the A5D, and A508 to reach J15 of the M1 north.</p> <p>Any other comments 14 Are there any other comments you wish to make which you have not already made?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Are there any other comments you wish to make which you haven't already made?:</p> <p>Maximum size (area and height) of each unit must be specified. Provision needs to be made to prevent light pollution 24 hour working and pollution from factory processes. There is no regular bus service so the number of cars in the Stratford Road area is bound to increase. Stratford Road is narrow and already busy, has no pavements and a number of blind corners making it dangerous to walkers, cyclists and horses. Of particular concern is the safety of our young people using the Quarries Scout Camp. The advent of electric cars makes this more dangerous as their approach cannot be heard</p>		
SPD165	Elizabeth Robinson Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood. Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer:</p>	<p>safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local</p>	<p>proposal for each site.</p> <p>The wording relating to frontages onto the A5 and Towcester Road has been strengthened.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood. Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood. 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood. Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood. 13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site</p>	<p>flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The SPD can be revised in future to include AL3 as necessary. Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner. Planning applications and the suitability of the redline boundary will be determined against the development plan and material considerations</p>	<p>the document that will seek to encourage/steer applicants towards more ambitious design standards. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p>		subject to a further impact assessment in line with the general principles set out in the SPD.
SPD166	NO INFO			
SPD167	Christopher Whitlock Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>Yes</p> <p>Please provide comments to support your answer: It is important that the buildings be sympathetically designed in accordance with the local environment. They should be aesthetically pleasing and not just boxes. They should be tailored to a rural environment with natural screening.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The original local plan only allowed small and medium size units, there was no scope for large units. The maximum size should be limited to 5,000m<sup>2</sup>. The Maximum height should be limited to 10m. The SPD allows for units at AL1 to be up to 15m high (on a 7m platform?) That suggests a maximum height of 22m; it would take years for trees to grow tall enough to screen the site.</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer: The proposed constraints do not go far enough; allow for large units where the local plan only allows small and medium development.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: There is no traffic assessment for this site. The road infrastructure all too readily becomes congested especially if there are problems with the M1 and motorway traffic is diverted to the A5. The A43/A5 junction is not well designed bringing 3 lanes into 2 at the North and South exits onto the A43; this causes conflict and accidents.</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p>	<p>implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Again there is no traffic impact assessment. The access to the site off the Greens Norton road has no traffic light control onto the A43/A5 roundabout. It is not suitable for heavy goods vehicles. The site should be limited to small units. Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: The site should exclude large units in accordance with the local plan. I agree that the height and placing of units should be allowed to overshadow the solar farm. There is no traffic constraint on the site which only has access to the A43 to the North. The A43 is a key cross country link between the M40 and M1 so traffic from the site would need access in both directions; currently the only route south would be through Silverstone Village past the school and over mini roundabouts not suitable for HGV traffic. HGVs could be banned from Silverstone and forced to travel North to the Tove roundabout</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>before going South; but how would this be enforced?</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The proposals allow for large units which are outside the local plan. No traffic impact is included. Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: The proposals allow for large units to be constructed which are outside the local plan. It is sensible to donate much of the site to the parkland providing additional recreational opportunities; however care must be taken not to impinge on the flood plain.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The access point to the site requires the construction of a roundabout on the A508 very close to the existing traffic light controlled A5/A508/A422/Stony Strafford Road. That roundabout becomes congested in every rush hour with tailbacks on the A5 North &amp; South. Again no traffic impact assessment is included.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>Development on all four sites should be held back until a cumulative traffic assessment has been made and suitable controls included in the SPDs to limit the size of the developments in keeping with the local plan.</p>		
SPD168	John Robinson Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>No</p> <p>Please provide comments to support your answer:</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The wording relating to</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p>	<p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals</p>	<p>frontages onto the A5 and Towcester Road has been strengthened.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood. Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer:</p>	<p>would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The SPD can be revised in future to include AL3 as necessary. Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner. Planning applications and the suitability of the redline boundary will be determined against the development plan and material considerations</p>	<p>applicants towards more ambitious design standards.</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>I would support the SPD if it was modified to include all 8 recommendations submitted by Councillors Charles Manners and Alison Eastwood.</p>		
SPD169	No Info			
SPD170	Kim Monro SCOUT ASSOCIATION Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>As a Scout Campsite of 100 years the impact to all aspects of our site will be huge. I do not believe the environmental impact to our site has been considered, an environmental report on the impact to the Scouts property needs to be considered. Likewise with the noise disturbance to hundreds of camping children and the increased traffic. It makes a mockery of all our previous planning dealings with the council.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p>	As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include consideration of the Scout Hut where applicable.	Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: As a Scout Campsite of 100 years the impact to all aspects of our site will be huge. I do not believe the environmental impact to our site has been considered, an environmental report on the impact to the Scouts property needs to be considered. Likewise with the noise disturbance to hundreds of camping children and the increased traffic. It makes a mockery of all our previous planning dealings with the council.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: As a Scout Campsite of 100 years the impact to all aspects of our site will be huge. I do not believe the environmental impact to our site has been considered, an environmental report on the impact to the Scouts property needs to be considered. Likewise with the noise disturbance to hundreds of camping children and the increased traffic. It makes a mockery of all our previous planning dealings with the council.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Are there any other comments you wish to make which you haven't already made?:</p> <p>The impact to 1000's involved in Scouting, DofE and many other youth groups that use the campsite will be huge. The development of the site will cause changes that will have a cost yet to be considered.</p>		
SPD17 1	Owen Clements Online response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Not Answered Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Not Answered Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process. The SPD will be amended to confirm that the heights are indicative and that further assessment and design</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury  10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered</p> <p>Please provide comments to support your answer:  11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove  12 Do you agree with the constraints and opportunities identified in respect of Site AL5?  No</p> <p>Please provide comments to support your answer:  I have a number of concerns looking at the plans;  1 - Light noise and traffic disruption to the area and residents, the area is already very difficult from a traffic perspective for a Village like Cosgrove, additional noise, light pollution and traffic will not help the situation.</p>	<p>at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>2 - I have a concern over the size of the units, that are proposed, the mega units currently already in the MK area are on the M1 with access to the motorway network, these will not have that access. This is also an area of natural beauty (Swan valley), has this been taken into account?</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		
SPD17 2	No Info			
SPD17 3	Martyn Dearsley Online Response	<p>The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer: the local infrastructure cannot cope with these increases in development</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>the traffic estimations are always geared to be the best scenario in favour of the developers. Reality is vastly different. Silverstone is effectively cut off from Towcester every Friday from 2pm to early evening at present and frequent issues with the M1 or M40 cause the same on any other day</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>No</p> <p>Please provide comments to support your answer: Towcester is now a huge car park due to the current traffic volumes. The bypass/ relief road currently under construction will only add to the queues</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p> <p>No</p> <p>Please provide comments to support your answer: its in an inappropriate area and will just add to congestion, noise and pollution</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p>	<p>safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: it doesnt account for the fact that there is no southbound A43 sliproad which will result in HGV traffic running through the village past the school 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The building footprints and heights are excessive. They will be a blight on the landscape Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: The A508 and A5 are now a substitute motorway at busy times. Putting further development at this location will add to this 13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer:</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>South Northants was once voted as one of the top 4 places to live in the country, people seem determined to make it one of the worst by destroying landscapes, reducing air quality, adding to flooding risk and adding light pollution.</p>		
SPD174	Ron Childs Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer: The SPD doesn't consider the effects on the village of Cosgrove and is far larger than is reasonable and not appropriate for the area which is open countryside.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>Yes</p> <p>Please provide comments to support your answer: There has to be a limit on the size of units and this should help stop developers from proposing units that are too large. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>Not Answered</p> <p>Please provide comments to support your answer: AL1 is of little concern to Cosgrove</p>	<p>This SPD has been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: AL1 is of little concern to Cosgrove Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer: AL2 is of little concern to Cosgrove</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: AL2 is of little concern to Cosgrove Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer: AL4 is of little concern to Cosgrove</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p>	<p>impacts on the roads would be severe. As part of the planning application process, any adverse impacts on communities such as Cosgrove and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: AL4 is of little concern to Cosgrove Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: SNC approved the development without any consultation, and this will have great implications for the village of Cosgrove</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: This proposed development will have major impact on the village of Cosgrove, which already suffers from intolerable traffic levels from Cosgrove Park. This must not be allowed to proceed without major improvements to the highway's infrastructure. The roundabout at the A5/A508 interchange is already heavily congested, particularly when there are delays on the M1. The development and operation of this site will result in unsustainable traffic levels. Noise and light pollution will also have a detrimental effect on what is currently open countryside.. Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		This development was proposed without consultation with the village of Cosgrove and as such is having major effect on the health and well being of residents.		
SPD17 5	Rachel Lalor Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: Traffic already a regular nightmare Destruction of rural spaces while plenty of space in MK</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: Wrong place Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No Please provide comments to support your answer: 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p> <p>No Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4?</p> <p>No Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>No Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p> <p>No Please provide comments to support your answer: 13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No Please provide comments to support your answer: Any other comments</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		
SPD17 6	Peter Karklis Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: See my later comments</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: See my later comments Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer: See my later comments</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: See my later comments Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Ecological studies will also need to be provided at the planning application stage.</p>	Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer: See my later comments</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: See my later comments Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: See my later comments</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: See my later comments Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: See my later comments</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: See my later comments Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: Areas of concern with regard to the development from a Cosgrove perspective</p> <p>1. Excessive increase in Traffic, Noise, and Pollution It is our understanding that the proposed development will at peak generate at least 900 HGV movements per day on a 24 / 7 basis. This will create a massive increase in the already overloaded A5 /A508 / A422 Island - Junction. Currently it is not unusual to experience delays of 20-30 minutes during peak times on all the four approaches to the Old Stratford Island. Upon reviewing the development, based on the parking allocations, around the nine units, it would appear to there are in excess of the following vehicle allocations: 605 parking allocations 90 HGV1 off-loading bays 65 HGV1 parking allocations i.e the site has the potential for at least 150 HGV's &amp; 600 cars/vans</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Over a 24 hour period the manning levels could be between 500 to 1000 personnel  Based on this assumption over a 24 hour day, with at least two shift changes there could be the following:-  2000 car / van movements  900 HGV 1 movements  This coupled with the already over-loaded road system around Cosgrove due to the massive 'Cosgrove Caravan Park' which when occupied outnumbers the village residents by approaching 10 to 1, and at weekend and holiday peaks generate 1500 vehicle movements per day. NB all through Cosgrove village  I feel this is just another significant element that I consider should be taken into consideration when reviewing the validity of the Frontier Development.  Taking this rational a stage further, I do feel that the proposed development should be viewed in context with the following other potential developments in the area.  i.e  a) Deanshanger - Furtho - Old Stratford 6000 houses. If developed this could add another 8,000 vehicle movements to the A5/A422/A508 network  b) Northampton Gateway J15-M1 between Courteenhall &amp; Milton village - 10,000 employees, so a proportion of the potential 15,000 vehicle movements impacting the A5/A422/A508 network  c) Towcester Racecourse development of 4,500 houses, again contributing a proportion of the potential 6,000 vehicle movements impacting the A5/A422/A508 network.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>d) The proposed A5 Towcester 'DHL Transport Depot' local to Bell Plantation Garden Centre - 1200 employees, as again contributing a proportion of the envisaged 2000 traffic movements per day to the A5/A422/A508 junction.</p> <p>Conclusions</p> <p>a) A very major increase in CO2 emissions, which could be unacceptable.</p> <p>b) Noise associated with the addition of at least 900 HGV movements, and up to 2,000 car/van movements per day. This not considering the additional impact of the other four developments as detailed above. Detailed modelling would be required to ensure unacceptable noise and CO2 pollution levels are not transmitted to the adjoining villages.</p> <p>c) Light Pollution - the potential of 12 hectares being illuminated on a 24 / 7 basis would create a significant 'sky-glow' for at least a 5 mile radius. Effectively impinging on Cosgrove; Deanshanger; Old Stratford;; Stony Stratford; and Wolverton. The light pollution being especially relevant to the 12 properties on the Stratford Road (Cosgrove), and most of Cosgrove and Old Stratford villages.</p> <p>d) Consideration should be given to the access of the emergency services to the above villages due to the increase load on the A5/A422/A508 Island. This is an existing issue in the current road network.</p> <p>e) Should this development be granted in it's current form and size, we see this as creating irrevocable damage to a ancient settlement area, which was named in the Domesday Book</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>f) The presence of the predicted traffic increase on an already 'unfit for purpose' road infrastructure would create mayhem in the locality, so creating an impossible bottleneck at the Old Stratford Island. With this consequence, the increased CO2 level we feel would be unacceptable, both locally and in a county perspective.</p> <p>Cosgrove is already blighted by the ever increasing caravan park patronage , which would be dwarfed by this proposed development in it's current scale.</p> <p>g) The effect on the ecosystem and wildlife would be irreparable, due to the points made above. The area and brook has deer; fox; rabbits; badgers; kingfishers; &amp; newts in residence, to name but a few. Should this development be granted in it's current size and form, we see this as a water-shed, creating an 'open-book' for further development projects.</p> <p>This being especially relevant for future housing, which could go beyond the proposed 'Country Park', right through to the Cosgrove Church of St. Peter &amp; Paul, and the site of Cosgrove Manor.</p>		
SPD17 7	Tony Maroun Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p>	<p>highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: I believe there will be huge disruption to the neighbouring town in terms of traffic on the short term and long term with heavy trucks and vehicles coming in and out from the area</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: I do think that this is beneficial in some ways, but regardless, this area is known to have its quiet and rural type. With this big development, all the aspects that locals praise themselves to have, will be violated</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: As a resident of the area, i am more concerned eith traffic, noise, disruption and environmental effect of these units, which I believe they would be on a high scale for such a development, therefore i am against them, especially the AL5</p>		
SPD178	Jean Gillett	4 The SPD sets out a number of overarching design principles. Do you agree with these?	Building heights have been informed by a combination of desk-based	The SPD will be

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
	Online response	<p>No</p> <p>Please provide comments to support your answer: The overall building height for AL4 Shacks Barn is 15m I don't think it should be more than 9.5m which is the height of the highest existing building, The original local plan allowed for small and medium size units only the draft SPD is now introducing large units. I want the SPD to ensure that only small and medium size units are built and the maximum size is 5,000m<sup>2</sup></p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Please provide comments to support your answer: the Shack barn site has no direct access from A43 for south bound traffic which means the A413 will be used and Silverstone will be polluted from HGVs and Lorries access the site via Silverstone Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes</p> <p>Please provide comments to support your answer: 7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes</p> <p>Please provide comments to support your answer:</p>	<p>assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer:</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: I do not agree with large units of 8,000m2 being built the largest size at the moment is 5,000m2 in Silverstone Park and they have access to A43</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No the height of the buildings are too high and will not be able to be screened by vegetation and the building units of 8,000m2 is without access to the A43 for south bound arriving and departing traffic means silverstone will be used as a rat run for lorries and HGVs</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Yes Please provide comments to support your answer:</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer: Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: I believe the SPD should require a cumulative traffic assessment be carried out for ALL sites. I am aware of how congested the Towcester roundabouts become at rush hour and I am very concerned that Silverstone will be used by HGV coming from and joining the south bound A43</p>		
SPD179	Lucy Scott Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer:</p>	<p>The SPD has been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including neighbouring settlements and communities.</p> <p>As part of the planning application process, any adverse impacts on</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Areas have been identified, however where those areas are, doesn't seem to have been taken into account, nor the impact. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p>	<p>communities and individual properties and the environment which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>considered as part of the planning application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Don't understand the constraints when you consider the impact this will have on conservation areas, wildlife, trees and on a rural area already struggling with traffic and congestion</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Future development set against this would completely decimate the area. It would blight the lives of local people but also negatively impact tourism and the opportunities city children have to experience and appreciate the countryside at The Quarries Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>I think that any development should think about the short and long term affects of this. Not only does it ruin and reduce the countryside, it also will cause traffic, as the roads are not suitable to support it, pollution which will affect the remaining countryside and the people living here, and it will cause danger for those living in the village, of all ages due to all the traffic and congestion.</p>		
SPD180	Colin Kightley Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Not Answered Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Not Answered Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to mitigated to the satisfaction of the decision maker.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: An area of natural beauty at the entrance to a small village who's road infrastructure and that of associated villages cannot cope with the addition lorries.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The A5 roundabout at present cannot cope with the traffic it gets at the minute and when there are incidents on M1 or surrounding roads it's worse. The access to the roundabout cannot take any more. It will be dangerous, costly and of no benefit to local residents and would make moving to the area a bad choice</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: It's ridiculous to consider it, if there would be expansion it would have no where to go but to join up to the outlying houses of Cosgrove</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		
SPD18 1	James Smart Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p> <p>Please provide comments to support your answer: I do not agree with these design principles. Beyond the visual impact for everyone living in the area, the traffic issues are staggeringly obvious. Even now, before any such development, Towcester is a bottle neck that even a brand new bypass would not fix. Currently, each day there are huge traffic queues.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The proposed business sites will have a hugely detrimental effect on the local roads. But worse of all is the lack of access to the A43 from the Shacks Barn site. Instead the lorries and vans all drive through the village of Silverstone, clogging the roads, speeding...I see it now, almost daily. All lorries should currently be forced to drive to join the northbound slip road onto the A43 to Towcester where they can use the roundabout to continue southbound.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: Bearing in mind the size of the current buildings at the Silverstone Circuit (5,000m<sup>2</sup>) and over the road at the Technology Park I am surprised that the large buildings on the proposed sites will be considerably larger in size. Easily visible for miles around and likely lit up for hours. An eyesore. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer: I see no opportunities for the local population as a result of the Bell Plantation site. instead, we are subjected to huge buildings, lit up every single day of the year, around the clock. Illuminating the sky and the area....constantly. Just look</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduce the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy.</p> <p>A design principle has been added that directly addresses the need for high quality building &amp; landscape design across the site as well as including more appropriate imagery</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>at the sites at Crick and further up the A5 at Magna Park, these are huge, huge buildings. Constantly active and busy. Would you want to live on the doorstep to a site like this?</p> <p>Any proposed opportunity/jobs are not going to be filled by locals. Local people already live in the area right now. They live and work here already. So the vast, vast majority of potential posts being filled will be for people driving to the site to work. People who do not live in the local area already....doubling down on the traffic issues.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: I see no opportunities for the local population as a result of the Bell Plantation site. instead, we are subjected to huge buildings, lit up every single day of the year, around the clock. Illuminating the sky and the area....constantly. Just look at the sites at Crick and further up the A5 at Magna Park, these are huge, huge buildings. Constantly active and busy. Would you want to live on the doorstep to a site like this?</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p> <p>No</p> <p>Please provide comments to support your answer:</p>	<p>throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please see AL1 answer for exact same response. The same applies.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Please see AL1 answer for exact same response. The same applies.</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: Please see AL1 answer for exact same response. The same applies.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: In addition to the huge building sizes, proposed for the site, Far too large. The bigger issue is the traffic. As stated earlier, the lack of direct and immediate access tot he A43 southbound means that all traffic will drive through Silverstone village. I currently follow lorries on a daily basis coming from the Shacks Barn road and not a single one drives on the northboudn slip to Towcester to turn around. Instead</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>they all drive through the village. Ironically, slow for the most part and then fast through the actual village. Each one drives through the village and onto the A43 southbound. This proposed site will destroy the relative peace of the community.</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Not Answered Please provide comments to support your answer:</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: No. Hopefully the gist of the comments left here are clear. The buildings are far too large. The impact upon the local road network will be catastrophic (please visit in the afternoons, even now for proof). The village of Silverstone will be ruined by the constant stream of lorries, vans and cars from the Shacks Barn site. There MUST be a slip road the site directly onto the southbound A43. Without it, the lorries will all drive through the village. They already do.</p>		
SPD18 2	Karen Bush	4 The SPD sets out a number of overarching design principles. Do you agree with these?	The scope of the SPD is to establish general guidance and design	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
	Online Response	<p>No Please provide comments to support your answer: The document sets out to answer a question that no one is asking - namely to situate an employment zone and industrial estate in a hazardous location on a green field site</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: The Cosgrove/Furtho Pit location is unsuitable to medium or large units Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer: 7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p>	<p>principles for the allocated employment sites.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: We are on the edge of Milton Keynes which already caters for the employment opportunities offered here. Warehousing of this nature should be restricted to MK and the M1 corridor - and Northampton if it wishes to become a city. Warehousing provides few skilled employment opportunities and only supports multinational companies not local ones</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: This is on the edge of a residential area and will cause 24 hour noise and light pollution. Residents already have issues with traffic going to the Stratford roundabout and on the roundabout its self any further development will only exacerbate the situation. Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: Leave our green spaces alone this development does not fit with the governments green agenda</p>		

<p>SPD18 3</p>	<p>Alexander Bush Online Response</p>	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: You are perfectly well aware that the LP part 2 was pushed through with inadequate consultation during lockdown. There is no current requirement for these developments and the road network is not capable of coping with the increased traffic flow 5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: This is inappropriate development for a rural location Your comments about Site AL1 -Land at Bell Plantation, Towcester 6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer: 7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester 8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer: 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4</p>	<p>The Local Plan Part 2 was undertaken as part of a robust local plan preparation process which included consultation.  The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.  The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>No changes necessary.</p>
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Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD18 4	Laura Hewetson Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts including noise and heritage on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: Impact on highways network Noise pollution in a conservation area 13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Light pollution in a green conservation area. Any other comments 14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		The highways network can't take this development. This is a conservation area, it should be preserved not destroyed and built on.		
SPD18 5	Caroline Hickie Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Not Answered Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Not Answered Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 allocates these sites for future employment development. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: The proposed development is wholly inappropriate. It contravenes 7 of the 10 Objectives under section 2.2.3 of the SNLP (Part 2). It drives through the outstanding planning permission limited to the section to the west of Old Cosgrove Road (quoted as "a mixture of farmland, derelict former (now filled) gravel pit, plant hire testing and builder's storage facility"; what might be referred to as 'brown field') for solely B1 and B2</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>development which was granted after commentary and revision of the initial application/s - dimensions, increase of traffic on to the congested A508, etc..</p> <p>It should be noted that previously permission had been refused for a garden centre for similar reasons. What has changed in planning to now allow for B8 development on a site which was considered appropriate only for B1 and B2?</p> <p>The east section is wholly farmland and has never previously been considered for development.</p> <p>While a proportion of the land is designated within Old Stratford, Old Stratford itself is to the south of the raised dual-carriageway A5 and will be largely protected from the impact of the development. It is Cosgrove, a small rural village which will be most impacted and it's rurality destroyed visually and from continuous noise, light, dust and traffic pollution, all of which contravene the Objectives of 2.2.3 of the SNLP (Part 2). Warehouses have a significant impact on their location. Have any such ever been sited within the boundary of a village, as is the case here with Cosgrove?</p> <p>Ease of access to major routes and motorways is a pre-requisite. This is not the case here where access is on to the two-way A508, and within 200 metres of a busy 4 way intersection, while the M1 is 10 miles distant. The A508 is a two way minor, certainly by no means a major, A road, which accesses between the M1 and the A5; at no point between these two is it duelled. It is heavily used (often when the M1 has traffic problems, whether north or southbound, it is used as a diversionary route) and the roundabout</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>at the intersection of the A5/A508/A422 is already a bottleneck with often and daily significant traffic queues. The identified access point is unacceptably close to the A5/A508/A422 roundabout intersection and will severely affect traffic flow.</p> <p>The eastern section of the land, which, is sited in Cosgrove to the south of Stratford Road, is greenfield farmland. The development will 100% do away with this. The land is also clearly visible when entering and leaving Cosgrove and the visual impact of the development will be massively evident.</p> <p>Noise and light pollution will very heavily affect Cosgrove. The more so as the prevailing wind is from the west and south. The value of a 'Country Park' is a highly questionable benefit. Currently the identified land is open countryside greenfield farmland. Cosgrove does not need a Country Park having adequate and considerable public pathways throughout the village. Due to the A5 dual-carriageway the 'Park' will only be accessible from Old Stratford via a footbridge over the A5. Old Stratford already has two such amenities to the north and south (Ouse Valley Park) of the 'old' A5 on the border with Stony Stratford. Furthermore, what constitutes a 'country park' and who will be responsible for and guarantee making it into a park, let alone its maintenance, and overseeing of that maintenance, into the future? And what if the owners of the proposed development run into difficulties?</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No</p> <p>Please provide comments to support your answer:  The proposed development is wholly inappropriate.  It contravenes 7 of the 10 Objectives under section 2.2.3 of the SNLP (Part 2).  It drives through the outstanding planning permission limited to the section to the west of Old Cosgrove Road (quoted as "a mixture of farmland, derelict former (now filled) gravel pit, plant hire testing and builder's storage facility"; what might be referred to as 'brown field') for solely B1 and B2 development which was granted after commentary and revision of the initial application/s - dimensions, increase of traffic on to the congested A508, etc..</p> <p>It should be noted that previously permission had been refused for a garden centre for similar reasons. What has changed in planning to now allow for B8 development on a site which was considered appropriate only for B1 and B2?</p> <p>The east section is wholly farmland and has never previously been considered for development.</p> <p>While a proportion of the land is designated within Old Stratford, Old Stratford itself is to the south of the raised dual-carriageway A5 and will be largely protected from the impact of the development. It is Cosgrove, a small rural village which will be most impacted and its rurality destroyed visually and from continuous noise, light, dust and traffic pollution, all of which contravene the Objectives of 2.2.3 of the SNLP (Part 2). Warehouses have a significant impact on their location. Have any such ever been sited within the boundary of a village, as is the case here with Cosgrove?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Ease of access to major routes and motorways is a prerequisite. This is not the case here where access is on to the two-way A508, and within 200 metres of a busy 4 way intersection, while the M1 is 10 miles distant. The A508 is a two way minor, certainly by no means a major, A road, which accesses between the M1 and the A5; at no point between these two is it duelled. It is heavily used (often when the M1 has traffic problems, whether north or southbound, it is used as a diversionary route) and the roundabout at the intersection of the A5/A508/A422 is already a bottleneck with often and daily significant traffic queues. The identified access point is unacceptably close to the A5/A508/A422 roundabout intersection and will severely affect traffic flow.</p> <p>The eastern section of the land, which, is sited in Cosgrove to the south of Stratford Road, is greenfield farmland. The development will 100% do away with this. The land is also clearly visible when entering and leaving Cosgrove and the visual impact of the development will be massively evident.</p> <p>Noise and light pollution will very heavily affect Cosgrove. The more so as the prevailing wind is from the west and south. The value of a 'Country Park' is a highly questionable benefit. Currently the identified land is open countryside greenfield farmland. Cosgrove does not need a Country Park having adequate and considerable public pathways throughout the village. Due to the A5 dual-carriageway the 'Park' will only be accessible from Old Stratford via a footbridge over the A5. Old Stratford already has two such amenities to the north and south (Ouse Valley Park) of the</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>'old' A5 on the border with Stony Stratford. Furthermore, what constitutes a 'country park' and who will be responsible for and guarantee making it into a park, let alone its maintenance, and overseeing of that maintenance, into the future? And what if the owners of the proposed development run into difficulties?</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p>		
SPD186	Loren Kaiser	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>The area that concerns me ( Furtho Pit AL5 ) isn't a suitable place to build a huge logistics park. The environmental and highways impact would be negative and of no value to Cosgrove. The Design and layout is too vast and too close to a rural historic residential area.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Read my previous views on the proposal</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>Not Answered</p>	<p>AL5 has been identified for employment opportunities in the Local Plan Part 2.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>As part of the planning application process, any adverse impacts on</p>	<p>Additional wording has been added to the SPD to address comments from the Environment Agency.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?  Not Answered</p> <p>Please provide comments to support your answer:  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered</p> <p>Please provide comments to support your answer:  11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p>	<p>communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: AL5- Land at Former Furtho Pit, Old Stratford/Cosgrove. This proposal would be a disaster for Cosgrove. In its current form, it sprawls in front of a residential area and scout camp. It consumes public space which has a public foot path. The already busy and congested A508 wouldn't cope with the estimated 1000 HGV's that would be coming and going from the proposed logistics hub. Cosgrove residents would be subjected to light and noise pollution. The pollution and smells from HGV's would impact residents health and well being. It would have a dire impact on trees, listed buildings and the conservation areas in Cosgrove. Cosgrove is in a conservation area and many visitors come to walk and enjoy the beautiful surroundings which are positive for well being. We are facing climate change, serious drought and water shortages. There is an opportunity to use the proposed site to plant trees and create a sustainable woodland. The government have stressed the need to plant trees and are paying land owners to initiate this. This would create sustainable employment for land management of the area and would be in keeping with the ethos of Cosgrove. Cosgrove as a village is very much against the proposal and are very angry that such a proposal is being considered for our village, IT'S NOT WANTED!</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>should be considered?  No  Please provide comments to support your answer:  I do not agree with this proposed site for a vast industrial development so close to a historical residential area that would bring bring no benefit, only misery.  Any other comments  14 Are there any other comments you wish to make which you have not already made?  Are there any other comments you wish to make which you haven't already made?:  Cosgrove is not a good area to build a sprawling industrial hub.</p>		
SPD187	Trevor McCarthy-White Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?  No  Please provide comments to support your answer:  5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?  No  Please provide comments to support your answer:  Your comments about Site AL1 -Land at Bell Plantation, Towcester  6 Do you agree with the constraints and opportunities identified in respect of Site AL1?  Not Answered  Please provide comments to support your answer:  7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester 8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer: 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer:</p>	<p>need to mitigated to the satisfaction of the decision maker. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The premise that these developments will provide a large number of employment opportunities is flawed in so much as modern warehousing typically operates with low local manpower and is mostly automated. This will be an increasing trend.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: Comparing similar units built alongside the M1 to those proposed for a site adjacent to an A road (A508) is completely inappropriate and misleading, as anyone with a suitable background would know. Notwithstanding the proposed development's proximity to the residential area of Cosgrove.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p> <p>I am seriously concerned about the level of noise, vehicle movement, light pollution and general impact on the existing wildlife and green areas. It is clear this proposal is not in any way sympathetic with the existing environment.</p> <p>This proposal will significantly impact a huge number of residents and if successful will also set precedence for other such development.</p> <p>The opportunity to prepare the area for such a large disruption has been ignored and indicates the lack of forethought prior to this proposal. Not only is</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>this worrying but does not bode well for future grand proposals. One example was the large project to prepare the Old Stratford roundabout to cope with the increased traffic to and from Towcester and the M1, not to mention how pedestrians navigate this area, which has resulted in no improvement at all for users.</p>		
SPD188	Elizabeth McCarthy-White Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: 5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester 6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer: 7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester 8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered Please provide comments to support your answer: 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p> <p>Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4?</p> <p>Not Answered Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p> <p>No Please provide comments to support your answer: Definitely not. This plan is appalling. It will provide little employment opportunity in the future due the nature of the industry.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No</p> <p>Please provide comments to support your answer:            You can't compare a site by the M1 to those proposed by the A508 which is a residential area. The roads already are very busy and worse when there are problems on the M1 which will increase in the future. The Old Stratford roundabout is already inadequate for the amount of traffic and causes long tailbacks in peak travel times on a good day.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?            Are there any other comments you wish to make which you haven't already made?:</p> <p>The noise, traffic, congestion, pollution and light pollution will have a huge negative impact on the countryside, environment, wildlife and green areas. The size of the development proposed is hugely inappropriate for the area. The amount of traffic trying to get in and out of Cosgrove village is already out of proportion for the size of village due to Cosgrove Park being allowed to be overdeveloped.</p>		
SPD189	No Info			
SPD190	Lorraine Beechey Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?            No</p> <p>Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?            No</p>	<p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	<p>A design principle has been added that directly addresses the need for high quality building &amp;</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  Sites may have been identified but areas the sites are in do not seem to have been considered.  Your comments about Site AL1 -Land at Bell Plantation, Towcester  6 Do you agree with the constraints and opportunities identified in respect of Site AL1?  Not Answered  Please provide comments to support your answer:  7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?  Not Answered  Please provide comments to support your answer:  Your comments about Site AL2 - Land at Woolgrowers Field, Towcester  8 Do you agree with the constraints and opportunities identified in respect of Site AL2?  Not Answered  Please provide comments to support your answer:  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?  Not Answered  Please provide comments to support your answer:  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury  10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered  Please provide comments to support your answer:</p>	<p>This will include matters such as greenspace and amenity and heritage.</p>	<p>landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Can not see any constraints applied to the size and positioning of proposed development</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The size of the proposed development is totally inappropriate for the area. It will negatively impact the environment, listed buildings and conservation areas. A public open space will be lost and it will negatively impact the Scout site at The Quarries which is used to give children who do not live in a rural area, the chance to experience it - something that is important to all of us with the effects of climate change already evident. Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		The development is totally inappropriate for a rural area already experiencing problems with traffic and congestion. It will have a negative impact in terms of noise and disturbance and irreversibly damage trees, conservation areas, wildlife.		
SPD19 1	Jennife Evans Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include matters of ecology. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: This is a semi rural area and allowing large warehouses to be constructed with 24/7 usage is completely inappropriate. The effect of floodlit operation on residents and fauna will be severe. I am very worried about the increase in traffic on A508, A5 and through the village of Cosgrove. There is often congestion at the A5 roundabout near Old</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Stratford with tailbacks in all directions. Allowing warehouses to be built will exacerbate the problem. The A508 already has a large number of HGV using it as a cut through to the M1. There is a noticeable increase in traffic when there are problems on M1. Allowing warehouses to be built will exacerbate the problems. There are only two roads into Cosgrove village neither of which is suitable for HGV. Residents already suffer from pollution - noise and air - from heavy road traffic to and from Cosgrove Park allowing warehouses to be built will exacerbate the problems. At peak times traffic queues to get onto the A508. Allowing warehouses to be built will exacerbate the problems. The development of AL5 needs to be considered taking into account the effect of the distribution centres already under construction at the A5 roundabout near Fenny Stratford and north of Road.</p> <p>If AL5 has to be developed then it should be small and medium units that would offer greater local employment opportunities and fewer HGV movements.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		

SPD19  
2

Crispin Black  
Online  
Response

4 The SPD sets out a number of overarching design principles.

Do you agree with these?

No

Please provide comments to support your answer:

5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?

No

Please provide comments to support your answer:

Your comments about Site AL1 -Land at Bell Plantation, Towcester

6 Do you agree with the constraints and opportunities identified in respect of Site AL1?

No

Please provide comments to support your answer:

7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?

No

Please provide comments to support your answer:

It's in necessary due to the hudge development already done in the Milton Keynes area.

Your comments about Site AL2 - Land at Woolgrowers Field, Towcester

8 Do you agree with the constraints and opportunities identified in respect of Site AL2?

No

Please provide comments to support your answer:

These developments will increase pollution, road noise ect and are inappropriate for these areas

9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?

No

Please provide comments to support your answer:

These developments will increase pollution, road noise ect and are inappropriate for these areas

Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury

10 Do you agree with the constraints and opportunities identified in respect of Site AL4?

No

Please provide comments to support your answer:

These developments will increase pollution, road noise ect and

The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.

The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.

No changes necessary. Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD193	Amanda Proctor Online Response	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer: under the right conditions Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p>	<p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment. As part of any future planning applications, a series of conditions will be secured.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. material planning considerations.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Using Swan Valley units as the reference point for Large Units seems odd – comparing unit size to a site adjacent to the M1 and those by the A508 and in a residential area is not a sensible comparison. The two areas are completely different and impact the local environment differently. No large units should be on the Cosgrove site but a mix with majority small units would be more suitable. The site should only be used between normal business hours and not 24x7. 13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>should be considered?  No  Please provide comments to support your answer:  Any other comments  14 Are there any other comments you wish to make which you have not already made?  Are there any other comments you wish to make which you haven't already made?:  Cosgrove is a small no through route village with existing infrastructure issues / constraints. Any development will impact the residents so this Needs to be kept to an absolute minimum.</p>		
SPD19 4	Cllr Manners & Cllr Alison Eastwood	<p>Towcester is an attractive small historic "market town" and in my view any development on Employment Land ought to reflect this. The town has retained its character and recent "in keeping" developments in the town centre have improved the town and added to its amenities. Developments on employment land, if they are well designed can also make a positive contribution. To do so they need to be relatively small in scale and built using appropriate materials.</p> <p>I support the policy that employment land in the Towcester area should ideally be developed to provide employment for people who live in the locality. This too implies the need for small scale buildings suitable for a large number of smaller businesses.</p> <p>Large warehouses would quickly take up the allocated land and provide minimal local employment. Surely largescale tall warehouse buildings should be confined to the numerous major warehouse parks around Northampton and adjacent to junctions 15,15a,16 and 17 of the M1 motorway.</p> <p>So that developments form a seamless part of the town and do not dominate/detract from the local landscape the height of buildings should be limited to maximum say 12 metres (and preferably under 10 meters), which is plenty high enough for all</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>normal users. Higher buildings will dominate the gently undulating landscape and spoil the views from the town and the surrounding countryside. The ravages of ash die-back disease is going to remove many of the hedgerow trees from the landscape in the next few years and mean that any new out of scale developments will have even more impact. Careful landscaping of each employment site is also an important consideration retaining current hedgerows and trees and creating green spaces in the sites. Developers/landowners will go for the easiest option that will give them the quickest and highest returns. If they are allowed a “free hand” at Towcester this is likely to lead to a few large out of scale buildings providing minimal local employment. This can be avoided by the council seeking the development of well-designed smaller scale buildings.</p> <p>Background</p> <p>When the South Northamptonshire Local Plan Part 2 was adopted by SNC in July 2020 following years of work and consultation the employment sites within it were targeted for small to medium sized units on the sites allocated. As a Councillor in South Northants Council at the time of adoption, in the foreword there was the statement that the council would “aim to meet the demand for small and medium sized units by suitable land allocation.”</p> <p>The small scale nature of what the Part 2 plan envisaged was repeated at page 57. The employment sites were part of strategy to reduce out commuting and keep skilled workers in the district. Policy EMP1 Supporting Skills makes this clear. Page 121 – 122 of the Local Plan states</p> <p>13.1.5 Strategic employment generation is focused through the WNJCS at Towcester and Brackley, Motorway junctions and at Silverstone. The district has 65 business parks and the new sites supported through the Part 2 Plan are intended to:</p>	<p>impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations,</p>	<p>The wording relating to frontages onto the A5 and Towcester Road has been strengthened.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will</p>



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		<p>South Northamptonshire Local Plan (Part 2) 122</p> <ul style="list-style-type: none"> <li>• Meet local demand and strengthen the rural economy;</li> <li>• Provide the ability to strengthen local supply chains;</li> <li>• Local flexibility and choice of locations;</li> <li>• Meet the demand for small and medium sized units and</li> <li>• Contribute to reducing the level of out commute</li> </ul> <p>Page 123 para 13.2.1 states that the Towcester allocation sites AL1, AL2 and AL3 are to facilitate some additional small scale employment opportunities to provide additional choice and opportunity for the growing population and to look to reduce out-commuting. At para 13.2.2 the Local Plan states All three sites offer suitable locations for a range of new small and medium sized business units including uses that are ancillary or complementary to existing or proposed B Class uses. At para 13.2.3 the Local Plan when describing the Bell Plantation site AL1, represents an appropriate employment location for the provision of additional small and medium sized commercial buildings<sup>17</sup> the footnote 17 referred to stated The usual definition of small and medium sized enterprises (SMEs) is any business with fewer than 250 employees I would not have supported any planned development that did not meet the above criteria and would not have voted for the Local Plan in 2020 if the risks had been highlighted. I cannot understand why our Planning Officers have not discouraged developers such as DHL and IM by stating the above policy. Page 131 para 13.3.1 when describing The Shacks Barns allocation AL4 states This allocation proposes to extend the business park with a range of new small and medium sized business units</p>	<p>meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner. Planning applications and the suitability of the redline boundary will be determined against the development plan and material considerations.</p>	<p>seek to encourage/steer applicants towards more ambitious design standards.'</p>

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		<p>The applications and proposals for these sites that have subsequently come in bear no relation to spirit or letter of the policy as adopted and are trying to stretch it to breaking point. During discussions on one of the AL sites the mix of use between B1, B2 and B8 stated that the proposed mix of 95% B8 as proposed by DHL was a true mix, this goes against the spirit of the plan and needs firming up. A mix needs to be defined and no more than 33% B8.</p> <p>The stated aim of the South Northants Local Plan was to identify sites that would be for small and medium size operations. The council was well aware of the strategic location and the attractiveness of the logistics industry.</p> <p>That has resulted in a lot of large B8 warehouses along the main strategic highways, attracted the national and global operators and driven up values thus pricing out the local and smaller business. The policy was designed to readdress that balance not to feed into it.</p> <p>The policy was also wanting to address out commuting for work. The proposals suggested will run contrary to that ambition, far from preventing and reducing the number of residents who live in the district and work elsewhere, many of the proposals for pick and pack operatives will required people to be bussed into the district who are non-resident. Any of the proposals that acknowledge this should be refused for the non-compliance to the existing policies.</p> <p>Having set out the aims and objectives of the employment allocations in the South Northants Local Plan the council is now consulting on an additional Supplementary Planning Document (SPD) to give greater clarity to what it would like to see developed at these sites.</p> <p>Barton Wilmore</p>		

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		<p>I would like to have assurance that Barton Wilmore are independent as I understand their clients include both DHL and IM Properties.</p> <p>At the member's briefing on this topic the consultants repeated the mantra that they thought the council should not be too prescriptive in what it was proposing, which is precisely why we are now in the position we are.</p> <p>When the Local Plan Part 2 was being developed members were advised not to be overly prescriptive and indeed the NPPF calls for flexibility that employment sites can change in response to local and national market changes. What the events have demonstrated is we need to be more prescriptive.</p> <p>Exclusion of AL3</p> <p>The SPD as proposed will NOT cover AL3. It is proposed just to be applicable to AL1 (Bell Plantation / DHL site), AL2 – Woodgrowers (Services hub site), AL3 – IM Properties site, AL4 – Shack Barns (Podium Developments site) and AL5 – Furtho Pit (Frontier Site). The stated reason is that AL3 has a permission granted and thus cannot be covered retrospectively. Whilst I acknowledge this point, the SPD should cover any future development on AL3 not covered by the existing permission.</p> <p>For example if that permission was not built out, any subsequent application would not have any of the design constraints imposed on it that the others have. If the development community were to think that the SPD reduces their freedom to build whatever they want AL3 could become a prized spot if not covered by the scope of the SPD, there is nothing to stop land deals where something that may prove harder to achieve on one of the other AL sites that are covered get a land swap to be moved to AL3.</p> <p>Even if built out, the current planning permission is outline and over time the shape of AL3 could change, units may be</p>		

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		<p>reconfigured to be of a size and scale not envisaged by this SPD, thus again its provisions could be defeated easily.</p> <p>Recommendation 1            Include all future development on AL3 within the scope of the SPD. This will include any changes, remodelling, extensions or changes to the existing planning permission that has been granted.</p> <p>Definition of Small, Medium and Large Units            The SPD has made a good attempt to define a small unit, up to 2,500 m2 medium size unit, from 2,500 m2 to 8,000 m2 and then large being greater than 8,000 m2</p> <p>We need to keep a sense of scale, the Local Plan always wanted small and medium size buildings. The definition of large units at 8,000 m2 with no limit is unacceptable. We should reflect in our local planning guidance that we are aware of the mega or very large category of warehouse that is often at the motorway junctions which serve the national and global strategic logistics industry.</p> <p>The local precedent should be that no building's should be larger than 5000 m2 unless there exceptional reasons.</p> <p>Introduce the concept of very large 15,000 m2 category but stating that this will not be allowed within the AL sites.</p> <p>The use of the Swan Valley strategic site on the M1 to be a marker for rural locations such as those in the South Northants Local Plan is inappropriate and has no contextual consideration for a market town such as Towcester. The local plan states in the policy that proposals need to be in keeping with the surroundings. With the exception of AL3, all the other sites have industrial, retail or other units either on site or very near which act as a very good marker as to the size and scale envisaged by the council at the time of adoption of the local plan.</p>		

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		<p>The SPD directs that it would expect to see small and medium size units which reinforces the policy aims in the Local Plan but it does allow for large buildings in exceptional circumstances.</p> <p>Recommendation 2:  Restrict the medium size units size to a maximum of 5,000 m2 unless there are exceptional reasons.</p> <p>Update the guidance to have a fourth category of very large to reflect the strategic logistics settings of the district from above 15,000 m2 giving the large category defined limits. And further design planning changes will not allow these buildings to be joined up.</p> <p>Having set out that a very large category could exist the SPD should make clear that no very large units would be permitted on any site.</p> <p>Design Principles</p> <p>The SPD does a reasonable job in setting out the areas that are sensitive and the views and impacts that need to be considered by any applications that would come forward. The use of balloons / height indicators paid for by the developers should be asked for each application.</p> <p>The use bunds to provide screening, the lowering of buildings should both be encouraged. Residents will want to see height limits set.</p> <p>The SPD should set out that if using treelines etc to set heights that bunds with tree planting on top is not an acceptable way to make a ridge height acceptable in planning terms. In addition no building should be higher than 12 metres AOD and lower for AL2 at 10 metres.</p> <p>No building to be taller than any existing building on a nearby site ie for AL1 and AL2 this is site 4 (on page 28 of the SPD) and for AL4 this is site 6/Silverstone Business Park/Shacks Barn (on page 30 of the SPD).</p>		

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		<p>7) The control of the maximum ridge height of buildings to be 12m AOD. That is the area precedent and would fit with the intent of the Local Plan (2) for small and medium sized units.</p> <p>Recommendation 3</p> <p>Tighten up the language within the SPD to set limits on building heights to no more than 12 metres AOD. Tree planning on top of earth bunds is unacceptable and the trees will likely never to grow well. Tree maintenance must be legally binding.</p> <p>No building should be taller than any existing building on or in close proximity to the site. For AL1 &amp; 2 this the existing Bell Plantation complex , Old Greens Norton Road area and Tove Valley Business Park area; for AL4 the existing units at the Silverstone Business Park give a good reference and for AL5 the existing storage warehouse (Emmett's) should be the reference point, the Wolverton Mill area which in Milton Keynes municipal area does overlook it and is a reasonable reference, the Ouse Valley Park is too far away to be relevant</p> <p>Keeping Services On Site</p> <p>The SPD should make clear that all services and attenuation for say flooding like balancing pools must be kept on site and within the allocation area. The council should not allow the sites to be gradually creep in size by allowing some of these services to be adjacent to the AL site. This would stick the small and medium size of the allocation and help ensure that policy aims of the local plan are delivered.</p> <p>Recommendation 4</p> <p>All services and attenuation works must be within the site allocation red line on the South Northants Local Plan Part 2 Future Development – Units amalgamation</p> <p>In the same way that I have concerns about the exclusion of AL3 from the scope of the SPD we need to ensure that this suite of policies are looking to the future and what may happen on these sites.</p>		

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		<p>If designs come forward for a series of small and medium buildings what will prevent these from being joined up to make large and very large units in the future. The SPD makes it clear that small and medium are wanted and large only in exceptional circumstances. If we adopt my proposals of very large and extend the SPD to say no very large we will give some relief that the conversation from small to medium or medium to large cannot happen by stealth.</p> <p>Recommendation 5 The SPD should give some guidance that future development will not allow for the combining of two or more smaller units to create units not envisaged in the SPD. If coupled with the recommendation on very large will allow none of these.</p> <p>Site limit for single buildings The SPD should set that no one single building can take up more than 15% of the total space as allocated in the Local Plan. This will continue to keep the focus on the small and medium size and also help prevent the combining of smaller units in the future.</p> <p>Recommendation 6 The SPD should state that no single unit can take up more than 15% of the total area allocated in the South Northants Local Plan Part 2</p> <p>Traffic Surveys The SPD does not give any guidance on the traffic issues that many of these AL sites could give rise to. I accept that any planning application has to be accompanied with appropriate traffic survey and mitigation, none the less guidance is required. Many residents are concerned as to the traffic impact with some of the proposals that have been submitted. The cumulative impact of these, especially along the A43 and A5 and A508 does need to be addressed and a cumulative traffic assessment undertaken.</p>		

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		<p>I would like to see some guidance given that the council expects to see that a traffic survey will have impact from all these on the other one(s). AL1, AL2, AL3 and AL4 are all along the A43 corridor. However AL5 may impact those and these four may also impact AL5. In addition the traffic survey should take into account for example 9 miles along the A5 at Fenny Stratford there is currently under construction 2m sq ft of warehouses in addition to Junction 15 Seagro site. Some of this traffic will use the same stretch of the A5 as would be required for access to the AL5 Site. This needs to be included.</p> <p>We would also need to have some reference to the times when the A5 serves as the alternative route to the M1. This is becoming a more frequent occurrence with at least an incident every couple of weeks. The traffic assessment must acknowledge the strategic role of the A5 when there are issues with the M1 via road works or traffic accidents.</p> <p>For example AL4 the estimates are that there will be 245 HGV movements day &amp; night is possibly on the low side, but it is agreed that the majority will travel through Silverstone village (past a village school) en route to the southbound A43 &amp; M40; likewise those accessing the site from the south &amp; west will travel this route in reverse, which is not acceptable.</p> <p>Recommendation 7</p> <p>The SPD should state give some indications as to what a full and comprehensive traffic survey for each of these allocations would be to include the cumulative impacts and the impact when the M1 has issues and traffic migrates to the A5 and A508.</p> <p>Hours of Use</p> <p>It may be more for the planning application to set out and add conditions as to, hours of use, light, odour and noise pollutions, however the SPD could give some indications that 24 hour working, or polluting operations along the road will not be</p>		



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		<p>permitted. The sort of conditions that the council would be seeking would give clarity to both residents and the developers. Recommendation 8</p> <p>The SPD should give an indication as to the sort of conditions the council would seek to impose on the units near to the residential properties on all AL sites to prevent noise, light or odour pollution and hours of operation.</p> <p>I trust you will incorporate these recommendations into the final draft of the SPD. I request that I am kept up to date with each development as this progresses to adoption.</p>		
SPD195	C Duckworth Turley – IM Properties	<p>We act for IM Properties Plc (IMP) and these representations in relation to the draft Employment Site Allocation Development Brief Supplementary Planning Document dated July 2022 (Draft SPD) are submitted on their behalf. IMP is the developer of the consented employment park development scheme at the land to the east of Tiffield Road, Towcester (Site AL3), which is an allocated employment site within the adopted South Northamptonshire Part 2 Local Plan (July 2020). Approved IMP Proposals</p> <p>The IMP proposals were the subject of a hybrid planning application submitted to South Northamptonshire Council (SNC) for determination in August 2020. Following extensive consideration, the application was approved by Strategic Planning Committee on 27 January 2022 which ratified a January 2021 resolution to grant. The decision notice was issued by the Council on 23 June 2022 following the completion of the Section 106 Agreement on the same date.</p> <p>The approved IMP proposals will provide a high quality best in class employment park development. They will deliver sustainable economic growth and a comprehensive package of planning benefits at a site that is allocated for employment development. They represent exemplary development in a number of respects including design, landscaping,</p>	<p>Comments noted. The position regarding the AL3 approved development is clear. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>	<p>No changes necessary. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be</p>

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		<p>sustainability, and the response of the proposals to the local context and surroundings of the AL3 Site.</p> <p>The IMP proposals have been the subject of comprehensive and thorough consideration by the Council, with the benefit of considerable input and feedback from the local community, relevant statutory consultees, and from a broad range of key stakeholders. The approved application was subject to extensive engagement with Council officers, various interested parties, local community groups, and other local public representatives for a prolonged period. The pre-application process for the IMP proposals started in 2017.</p> <p>2</p> <p>The comprehensive programme of consultation and stakeholder engagement was undertaken in full accordance with the Council's Statement of Community Involvement and included ongoing engagement following the submission of the application including the maintenance of a dedicated project website. Further supplementary information was submitted on a voluntary basis in support of the application during the determination period and appropriate updates were made to the proposals to respond to the comments of consultees as well as the helpful feedback received from various interested parties and stakeholders.</p> <p>The consultation on the proposals included engagement with the following:</p> <ul style="list-style-type: none"> <li>• Immediate site neighbours and businesses</li> <li>• Towcester Town Council</li> <li>• Tiffield Parish Council</li> <li>• Tiffield Residents</li> <li>• Representatives of SNC</li> <li>• Highways England</li> <li>• Northamptonshire County Council</li> </ul>		<p>subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>The approved planning application was supported by a broad suite of relevant technical documents including an Environmental Statement to assess the likely significant environmental effects. All of these documents were produced by expert consultants following best practice. These documents provided a detailed evidence base to inform the Council's determination of the application proposals and their acceptability in planning terms. The assessments included, among other things, consideration of the site's context, its landscape character, and its visual sensitivity. All of the technical documents submitted with the application (including supplementary reports and evidence) were made available for public review and comment.</p> <p>The matters covered included the following:</p> <ul style="list-style-type: none"> <li>• Design</li> <li>• Transportation (including traffic and access)</li> <li>• Sustainability</li> <li>• Climate change</li> <li>• Built heritage</li> <li>• Landscape</li> <li>• Visual impacts</li> <li>• Flood risk</li> <li>• Drainage</li> <li>• Noise</li> <li>• Air quality</li> <li>• Biodiversity</li> <li>• Archaeology</li> <li>• Lighting</li> <li>• Arboriculture</li> </ul> <p>The conclusions from these assessments were used to inform the most suitable development principles, parameters, and development framework for the site. The parameters defined by the application and reflected in the approved parameters plan</p>		

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		<p>include, in summary, specified use classes, a range and number of units, a range of unit sizes, maximum total floorspace, unit floor levels, and maximum ridge heights.</p> <p>3</p> <p>These development parameters were approved by the Council, and it is a condition of the planning permission that the details of the proposals to be brought forward through reserved matters must accord with these approved parameters (as noted by the draft SPD at Paragraph 1.10) which sets the framework for the consent.</p> <p>The other conditions of the planning permission, together with the obligations of the Section 106 Agreement, include a package of measures to robustly regulate the delivery of the approved development including in respect of highway works (on-site and off-site); cycleway provision; design; on-site landscaping; strategic landscaping around the site; necessary tree protection; lighting; the heights of buildings; construction management; sustainability (including energy); noise and vibration mitigation; surface water drainage; ecology; and archaeology.</p> <p>The Council's determination of the application was, therefore, thoroughly informed by the outcomes of a broad range of assessments and expert inputs (including from statutory consultees). The Council's decision to approve the proposals had appropriate regard to the allocation of the site, other relevant policies, and the balance of other material considerations including the considerable benefits of the proposals which individually and collectively weighed very heavily in favour of the proposals and significantly outweighed any identified impacts.</p> <p>Exclusion of Site AL3 from the scope of the Draft SPD</p> <p>We agree with the Council that the contents and recommendations of the Draft SPD are not engaged and do not</p>		

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		<p>apply to the IMP proposals. Among other things, this is because the IMP proposals have already been the subject of a detailed planning application process that has allowed the Council to robustly assess and determine the acceptability of the proposals in planning terms including in respect of the matters covered by the Draft SPD in relation to the other AL sites. It is the hybrid permission for AL3 and the details approved pursuant to it, including the development parameters, which sets the framework for the proposals and in respect of which applications for reserved matters and discharge of conditions will be assessed against.</p> <p>Having regard to the very thorough level of assessment and expert consideration of the IMP proposals undertaken through the extensive and prolonged planning application process, and the terms of and details approved pursuant to the hybrid permission, it is entirely appropriate that the Council has confirmed at paragraph 1.10 of the Draft SPD that it does not apply to Site AL3 and the IMP proposals. The Council's positive determination of the IMP planning application has already allowed for suitable consideration and approval of the proposed development principles, framework, and parameters of the development.</p> <p>Requested Amendment to Text at Paragraph 1.10  For the reasons set out above, IMP support the position of the Council as set out in paragraph 1.10 of the Draft SPD. This makes it clear that the contents and recommendations of the SPD are not engaged and do not apply to Site AL3.</p> <p>This text should be amended slightly, however, to reflect the fact that the planning permission for the IMP proposals at Site AL3 has been granted since the Draft SPD was published for consultation. For clarity, we would also request that the wording of Paragraph 1.10 is also slightly adapted to confirm that future reserved matters and discharge of condition applications</p>		

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		<p>relating to the IMP proposals at Site AL3 would also have to comply with the approved development parameters set by the hybrid planning permission.</p> <p>4</p> <p>Our proposed wording for an amended Paragraph 1.10 of the Draft SPD would therefore be (our proposed amendments underlined):</p> <p>At its meeting of 27 January 2022 the Council's Strategic Planning Committee considered an application for the development of Local Plan Allocation AL3 (Tiffield Lane, Towcester). The committee resolved to approve that application and grant planning permission for the development. Planning permission was formally issued on 23 June 2022 following the completion of the related S106 Agreement. With matters already approved in respect of AL3 and with planning permission granted, this SPD does not consider or make recommendations in respect of that Local Plan Allocation. Any revised and/or reserved matters and/or discharge of condition applications for AL3 will have to comply with the approved parameters set out in that consent.</p>		
SPD19 6	John Russell	<p>Find below my observations on the Barton Willmore SPD</p> <p>1. The SPD prepared by Barton Willmore was designed to reduce uncertainty and provide clear guidance to all on what is expected from future developments.</p> <p>2. However, having reviewed the document in conjunction with the SNC Local Plan there are still anomalies and inconsistencies, which if the SPD is to reduce uncertainty and provide clear guidance, should be amended or removed.</p> <p>3. In the SNC local plan the employment areas were identified and paragraph 2.22 identifies</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the</p>

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		<p>that the allocated sites were intended to</p> <ol style="list-style-type: none"> <li>1. Meet local demand and strengthen the local economy,</li> <li>2. Provide the ability to strengthen local supply chains,</li> <li>3. Local flexibility and choice of locations,</li> <li>4. Meet the demand for small and medium size units,</li> <li>5. Contribute to reducing the level of out-commuting</li> </ol> <p>4. The emphasis is on the word "local". Local demand, local economy, local flexibility. How do the current applications meet these requirements?</p> <p>5. The SNC Local Plan also highlights the demand for small to medium sized units. How do the existing applications meet these criteria? Why is the planning authority even considering such applications?</p> <p>Other observations follow</p> <p>6. Cumulative Transport Impact Assessments (Paragraph 1.21)– With the likely traffic generation of the sites AL1, AL2, AL4 and AL5. In the SPD remove the word "may" and add the word "will" after "At the decision-taking stage this" This will ensure there will be a cumulative traffic impact assessment arising from the developments noted above. The developers must be required to carry out such an assessment, the results of which should be reviewed by an independent authority. This would be especially revealing at the current pinch points ie the Tove Roundabout, the Abthorpe roundabout and the A5 through Towcester and would also highlight the overall negative impact of further roundabouts on the A5 and the A43.</p>	<p>material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	<p>application stage will need to be undertaken to best shape a proposal for each site.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer</p>

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		<p>7. Scale of Buildings (Paragraphs 3.1, 3.3.) – The SPD in this respect is contrary to the requirements of the Town and Country Planning Regulations 2012 and the National Planning Policy Guidance, namely in the former that SPDs must not be in conflict with the adopted development plan and in the latter that SPDs cannot introduce new planning policies into the development plan. The reference to large buildings should therefore be omitted throughout the SPD. Going further it should specifically state that large scale buildings will not be accepted on the employment sites.</p> <p>8. The contextual relationship – (Paragraph 3.1) The SPD identifies the precedent set by the existing scale, form and character of developments along the A43 which are of a much smaller scale than the sites under consideration. I strongly disagree that there is any contextual relationship between the developments along the M1 e.g. Swan Valley and the rural nature of the sites north of the A43. There is a world of difference to the M1 sites which have very large buildings and excellent access to the M1 and the specific anticipation in the SNC Local Plan for small to medium size buildings. There should be a limit on the size of buildings to all the sites under review of 5000m<sup>2</sup> which more reflects the existing size of developments along the A43 as far as and including the Silverstone Circuit buildings.</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>



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		<p>9. Overarching Design Principles (Paragraphs 5.1-5.3) – Obviously a very important section given the need for the building to sit comfortably in their rural surroundings. Some words in this section are too woolly and need to be made stronger. For instance :-</p> <ol style="list-style-type: none"> <li>1. Line starting “New Development” the “should” should be changed to “will”</li> <li>2. Sub paragraph 4 Remove the words “Seek to” Visual impact should be a specific requirement not a maybe.</li> <li>3. Sub paragraph 6 Remove words “Recognise and”. Sentence will then start “Enhance existing landscaping features etc”.</li> <li>4. Sub paragraph 7 Remove words “Where possible” Sentence will then start “Contribute to” This should not be a maybe.</li> <li>5. Sub paragraph 9 Remove words “help explore opportunities” and add new words “ensure proposals” SPD wording is not strong enough.</li> <li>6. Sub paragraph 10 Remove words “Seek opportunities” and add “Provide definite plans” Remove the word “or” after decorative planting and add the word “and”</li> <li>7. Sub paragraph 11 Remove the words “Seek to visually break up” so the sentence will start “New areas of parking will incorporate etc “</li> <li>8. Sub paragraph 12 Remove the words “Look to” so the sentence starts “Integrate the movement etc”</li> <li>9. Paragraph 5.2 needs to be a lot stronger. The words “Clear justification” should be</li> </ol>		

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		<p>removed and the Overarching Design Principles must be totally met without compromise.</p> <p>10. There are other woolly words eg under paragraph 6.20 the words “should be explored “should be omitted and the word “implemented” inserted instead.</p> <p>11. Under clause 6.25 the words “likely to rise to 16.0m” are unacceptable and the word “effectively” should be changed to “fully”. But how long will it take to fully screen a 16.0m or even a 10.0m high building with new planting?</p> <p>12. Under paragraph 6.26a remove the word “would” and add the word “must” after “These frontages”. Also, same paragraph, remove the word “where possible”.</p> <p>13. These are a few examples where the SPD wording needs to be made much stronger.</p> <p>10. Small and Medium Buildings – Any reference to large buildings in the SPD should be removed as it sets out to change the parameters of the size of buildings ie small to medium, set out in the SNC Local Plan. It is noted that the size of buildings along the A43 corridor from the MI as far as the Silverstone Circuit Buildings is 5000m<sup>2</sup>. This should be written into the SPD as the maximum permitted size allowed.</p> <p>11. Maximum Ridge Heights - Coupled with the maximum size defined above is the need for a similar limitation on the ridge heights of proposed buildings to reduce the visual impact</p>		

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		<p>of each new development. Each of the sites in question has different ridge heights, the highest being that of AL1 at 18m from slab level. A maximum ridge height from ground slab level of 10.0m should be implemented in the SPD which is in line with similar developments along the A43 corridor referenced above. Paragraph 6.10 of the SPD makes specific objectives on the need for greater sensitivity in developing areas along the northern and north eastern edges of the site due to the rising topography and rural character of the land making this part of the site sensitive to receptors from the north, east and west, across the countryside from several PRowS. How can the buildings on AL1 at 18.0m to the parapet sitting on a raised plateau on the eastern side of the A5 and the buildings on AL2 which could be 10-12m in height on the western side of the A5 comply with the greater sensitivity proposed by the SPD? There should also be an additional proviso that the ground slab levels should relate closely to the existing ground levels at the front of the site. This is to prevent buildings being sited on unacceptably high plateaux.</p> <p>12.Site AL2 Access and Movement – (Paragraph 6.26) The proposed access is from the narrow Towcester Road leading to Greens Norton. There is no footway or cycleway along this road. How is this to be overcome? A new safe route from Towcester Town Centre</p>		

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		<p>should be provided.</p> <p>13.Site AL2 Heritage – (Paragraph 6.39) Remove the word “consider” and add the word “protect” after “Future proposals for AL2 should”</p> <p>14.Site AL4 – Location, Height, Scale, Massing, Screening and Traffic Impact – It is difficult to understand any logic for this application as follows</p> <p>1. Location – The site has no direct access onto the A43 going south. The route south would therefore be via Silverstone Village or via Whittlebury Village. There is no alternative. This is clearly something that must not be approved.</p> <p>2. Height, Scale and Massing - The proposed height is far in excess of that of the Shacks Barn development. Height should be restricted to 7.5m as the site is on relatively high ground and building size limited to 5000m2 as stated previously. On the current planning application, the SUDS are shown outside the current site area. This is surely not acceptable as this will lead to overdevelopment of the site.</p> <p>3. Screening – The current developer’s estimate for the proposed screening to be effective is 15years. This is far too long and if building heights were reduced the effectiveness would be so much quicker.</p> <p>4. Traffic Impact – This should be part of the Cumulative Transport Impact Assessment noted earlier but given the access issues as noted in 1. above, traffic will find the crosscountry alternative routes through villages.</p>		

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		<p>15. Site AL5 – This site should come within the parameters set out in the final version of the SPD.</p> <p>In Conclusion This is the opportunity to give the SPD some bite from a planning point of view and hence the need to change the woolly wording highlighted above so as to “reduce uncertainty” and “provide clear guidance” on what is expected from future developments.</p> <p>By allowing these developments in their present form would result in a death knell for the town of Towcester and the rural surroundings.</p> <p>The SPD should concentrate on clarifying the 4 key areas set out below:-</p> <ul style="list-style-type: none"> <li>0. Cumulative Traffic Impact Assessment</li> <li>1. Clarifying and giving more impact to the Overarching Design Principles</li> <li>0. Building size limited to Small to Medium size only as the SNC Local Plan with a maximum size of 5000m<sup>2</sup></li> <li>1. Maximum Ridge height of 10.0m above ground slab level which should also relate closely to the existing surrounding ground levels to prevent the introduction of unacceptably high building plateaux</li> </ul> <p>Finally, I sincerely hope that the words of the local inhabitants in reviewing the SPD and proposing worthwhile changes will be considered and acted upon and not just filed away like so many other objections.</p>		

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SPD197	Save Towcester Now	<p>General Pg 6 para 1.10 Pg 8 para 1.21</p> <p>The publication of an SPD to add supplementary guidance for the 4 sites is welcomed, although there are some reservations with part of the content.</p> <p>The format is helpful, but there are some inaccuracies in places. Details of which are listed below.</p> <p>The selection of sites AL1-4 was predicated on those sites providing employment to “match the skills of the local people. Thus balancing the ratio of in and out commuting” – see page 20 para 2.21</p> <p>2.22 also states that the allocated sites are intended to:</p> <ol style="list-style-type: none"> <li>1. Meet local demand and strengthen the rural economy;</li> <li>2. Provide the ability to strengthen local supply chains;</li> <li>3. Local flexibility and choice of locations;</li> <li>4. Meet the demand for small and medium sized units; and</li> <li>5. contribute to reducing the level of out-commuting</li> </ol> <p>Given the socio-economic context detailed on page 21 paras 2.29 to 2.35 the irrefutable evidence is for professional and managerial employment to be provided locally in order comply with the 5 criteria above and bring about modal shift. The lower skilled employment offered by B8 warehousing on AL1/2/4 is not compatible with the resident workforce and expressly fails the intention of the Local Plan (2) given in-commuting will increase to fulfil those vacancies.</p> <p>There should be more emphasis on the Design Principles, both overarching and detailed for the four sites. These are not worded sufficiently clearly to effectively supplement the policy. This para should end with: - The outcome of the planning application on AL3 is not relevant to consideration of proposals on the other sites.</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>

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		<p>Reads: 1.21. It is important to give appropriate consideration to the cumulative impacts arising from the other committed development ie development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years. REF: Paragraph: 014 Reference ID: 42-014-20140306 Travel Plans, Transport Assessments and Statements. At the decision-taking stage this may will require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of 2 transport network as well as other relevant local sites benefitting from as yet unimplemented planning approval. And add For each development application, traffic impact should be assessed on a consistent basis across sites, and cumulatively factoring all built and committed sites that have an impact on the same stretches of road. This in the context of prior pinch point funding on Tove/Abthorpe roundabouts and predicated on creating a road network able to cope with 3000 new houses at SUE.</p> <p>Scale of buildings Paragraph 3.1, 3.3 on page 24, 26 page 38 Contextual Considerations Page 24 Page 26 para 3.7</p> <p>The SPD as currently written introduces new policies, with the possibility of providing large scale building. This is not the intent of the Local Plan Policies and therefore should not be included in the SPD. Regulation 8 (3) of the Town and Country Planning Regulations 2012 states that SPDs must not conflict with the adopted development plan, and National Planning Policy Guidance (NPPG) Paragraph: 008 Reference ID: 61-008-20190315 clarifies that as SPD's do not form part of the</p>	<p>highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>Provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of pedestrian cycling and walking links.</p> <p>All relevant planning policies will also be applicable to the decision making</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered</p>

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		<p>development plan; they cannot introduce new planning policies into the development plan.</p> <p>Para 3.1 reads 'The existing scale, form and character of development along the M1 and A43 relating to AL1-AL4. The contextual considerations for AL1-4 are identified on page 26 as 2-7.</p> <p>Reference to the M1 in this paragraph should be removed as relevant context for AL1/2/4. The contextual considerations for AL1-4 are identified on page 26 as sites 2-7. Site 1 is situated on a motorway node, is strategic development and does not therefore represent a relevant reference point for AL1/2/4.</p> <p>All references to the Strategic Scale sites used as context within the SPD should make it absolutely clear that the sites subject of the SPD are not for large scale buildings. All wording should be 'Large Scale buildings will not be accepted on these sites' (the current definition being above 5,000 sqm.)</p> <p>In order to prevent future amalgamation of buildings to circumvent the intent of the SPD there must be a cap on the m2 for large buildings (e.g. 5,000m2 x 2). This should clearly state that despite a definition for large buildings being included, they will not be permitted on any of these sites.</p> <p>A43 Corridor – Scale, Form and Character Add to para 3.7</p> <p>This section considers the character of the A43 from the M1 down to Silverstone Circuit. It demonstrates the small and medium scale, form and character of existing and operational employment development. This helps to define an appropriate scale range for buildings/units within the four sites.</p> <p>Swan Valley and the J12A developments are defined as 'Strategic' development under the WNJCS, whereas the AL1-5 sites were specifically identified as 'non-strategic' for the Local Plan (2).</p> <p>3</p>	<p>process including biodiversity net gains and sustainable drainage systems.</p> <p>AL3 benefits from planning permission and is therefore outside the scope of this SPD. The SPD can be revised if this situation changes in the future.</p>	<p>against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>



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		<p>Page 38  Swan Valley is not contextual to the rural character of the land to the north of the A43 and therefore not applicable to AL1 and AL2.  The contextual considerations for scale, form and character for AL1 and AL2 are identified below as sites 2-7 and specifically site 4 at The Tove Roundabout.  The contextual considerations for scale, form and character for AL4 are identified below as sites 2-7 and specifically site 6 at Silverstone Business Park (Shacks Barn) which is the adjoining site to AL4.  Page 38 needs paragraph numbers  Second bullet point  The scale of buildings along the A43 Technology corridor indicates a maximum of 5,000 sqm including Silverstone Circuit buildings. Therefore, 'medium buildings' maximum is 5000sqm  Third bullet point  Large reflects the scale of buildings/units found in Swan Valley, a distribution park along the M1, setting a minimal footprint of 8,000 sqm at that location.  A cap on 'Large' is needed.  Final paragraph reads  The presumption will be for the accommodation, across the employment sites of a mix of small medium and in exceptional circumstances, large sized units, as defined above.  It should read  The presumption will be for the accommodation, across the employment sites AL1-4 of a mix of small and medium units up to 5,000 sqm and in exceptional circumstances, large sized units, as defined above.  There would be no 'exceptional circumstances' where large scale buildings are agreed for AL1-4 as this would contradict</p>		

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		<p>the relevant Local Plan policies. (Page 122 13.1.5 of LP repeated page 123 para 13.2.2.)</p> <p>4</p> <p>Overarching Design Principles (Paragraphs 5.1-5.3)</p> <p>Page 62</p> <p>The 12 'Overarching Design Principles' for all 4 sites (paragraph 5.3) are the key considerations for any planning application submitted (or submitted and not yet determined) for all of the sites. They are worded in general terms with further specifics given separately for each site later in the document. Two should be added with regard to 'traffic impact assessment' and 'electric charging'.</p> <p>These principles should be numbered and made more prominent in the document e.g. by a coloured text box. The wording of each should be reassessed and made stronger. Changes needed (deletions shown and additions in bold):</p> <p>New development for all each of the four allocated employment sites should will:</p> <ol style="list-style-type: none"> <li>1. Support Local Plan policy to deliver high quality small and medium scale development that is respectful of its setting within the boundaries of the allocation sites. This is core to the effectiveness of LP2.</li> <li>2. Provide evidence of cumulative impacts on the wider road network and key junctions/roundabouts as well as assessing the local impact of increased traffic arising from the development proposed.</li> <li>3. Ensure that development platforms are created to reduce the impact of the scale and massing of buildings on local character and the setting of the site, either in response to their height and/or the long &amp; uniform ridge lines they may introduce.</li> <li>4. Seek to Minimise any visual overbearance on short distance views, through immediately effective measures such as</li> </ol>		

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		<p>landscape screening and elevational treatment, and avoid significantly altering the character of middle or long distance views.</p> <p>Add</p> <p>Ridge heights must be measured in combination with "Above Ordnance Datum" (AOD) and site topography. AOD provides a standardised measure of height across sites (usually relative to sea level). Where a site slopes, developers may not create plateaux on the land to elevate buildings above road level. Plateaux must be excavated to AOD road level to reduce visual impact on the neighbourhood. A ridge height limit of 10m in relation to existing road levels is therefore essential to prevent overbearance.</p> <p>5. Incorporate high quality design solutions (including the use of material, colour palette, and/or architectural articulations) and landscaping to reduce the impact of building heights.</p> <p>6. Recognise and Enhance existing landscape features and planting, where possible using traditional field patterns and woodlands as design inspiration. Provide high quality large scale and immediately effective planting to the boundaries of the site within the confines of the existing allocation site.</p> <p>7. Where possible Contribute to the area's wider green network, including rights of way, habitat corridors and linkages. At least 10% biodiversity net gain will be provided on all sites in line with the requirements of the Environment Act 2021.</p> <p>8. Use existing and provide new footpath, cycle, and road networks to support and encourage sustainable travel and promote modal shift to the site from local residential areas and around the site.</p> <p>5</p> <p>9. Ensure the council and public transport operators are consulted to help explore ensure proposals opportunities for funding public transport improvements, including frequency and</p>		

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		<p>access to services for future employees and providing new services where applicable.</p> <p>10. Seek Provide definitive plans opportunities to address the existing appearance of the road network in a positive manner, be that through new active building frontage and decorative planting or and the retention and enhancement of existing native planted boundaries/edges.</p> <p>11. Seek to visually break up New areas of parking will incorporate with specified planting, areas of permeable material and SUDs features such as dry or wet swales, allowing the absorption and channeling of surface water.</p> <p>12. Look to Integrate movement, landscape and SUDs networks within the site by combining new or retained tree planting/hedgerow and SUDs provision along new roads.</p> <p>13. Limit the impacts on tranquility of each site's rural setting, this includes minimizing/mitigating any light, noise &amp; air pollution or visual clutter (i.e. advertising, corporate livery and logos) resulting from the future operation of new buildings.</p> <p>14. Provision of electric charging points in carparks will be required to the most up to date standards.</p> <p>Paragraph 5.2 gives a get-out clause saying that a 'clear justification' can be given if the proposal does not reflect them. This wording should be stronger, there is no reason why any proposal should breach these overarching design principles at all, given their general wording, even if an exemplar development is proposed.</p> <p>Should be worded 'These principles must be reflected in any development proposed for the four employment sites. No justification will be accepted for any development proposal that does not fulfil these general design principles.'</p> <p>Section 6 Assessment and Evaluation'</p> <p>Each of the sites should have an 'Assessment' and a 'Development Framework' Section. The headings are</p>		

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		<p>inconsistent. The Development Framework should have numbered development requirements highlighted in the text. As presented, it is not clear what is a development principle, there are just paragraphs. The wording of these development principles should be tightened up so its intent is clear and unambiguous...many are worded as descriptive rather than prescriptive. 'Should/will' to replace 'could'. Site AL1 Development</p> <p>AL1 Assessment page 66 and Framework 6.18 – 6.26 Page 68</p> <p>Page 66 (proposed changes shown as strike through for deletions and bold for additions of text)</p> <p>Surrounding Land Use and Scale</p> <p>6.1 The site comprises 9.71ha with a cluster of uses on 6.5ha, referred to as The Bell Plantation are situated within the south western corner of the site on 6.5 ha, uses include garden centre, nursery, vet and play centre. Buildings are relatively small in scale ranging from 4-10 4-6.5 metres to ridge height. The northern section of the AL1 site comprises 25 ha of fields, formerly agricultural use.</p> <p>6</p> <p>6.2 Brickyard Farm, including farmhouse and ancillary buildings is situated on the eastern edge of the site. Primary use is Brickyard Farm Dog Kennels, and Restful Pets (Pet cremations) which was established in 2002.</p> <p>A complex of buildings, referred to as Bairstows Lodges are situated along the A5 to the west of the site. Bairstows Lodge is an occupied residence located on the western side of the A5 opposite the south-western corner of this site. Next to Bairstows Lodge is a complex of buildings, formally Jack's Café. One building is used by Berry Cranes.</p>		

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		<p>6.6 The scale of tree belts varies but more substantial mature tree belts are an approximate height of 20m. Tree screening is limited to non-existent along the section abutting the A5 and will need to be replanted to screen the development from the A5 and sensitive visual receptors.</p> <p>Heritage Add that AL1 runs next to Watling Street (Roman Road) – A5. Site AL1 Development page 68</p> <p>General comments – It is important to separate the two applications on AL1 and rename to avoid confusion ie AL1(N) and AL1(S) referring to AL1 North development by DHL which includes the 6ha land for the potential football pitches; and AL1 South which is the site developed by the Warren Family who own the Bell Plantation Garden Centre. Each site is allocated in the Local Plan for development for a mix of small and medium units.</p> <p>To maintain the separation of both sites and to preserve biodiversity and improve visual and sound screening the coppice woodland dividing the two sites must be retained at its existing depth and density, contrary to the point at 6.22.</p> <p>Access &amp; Movement Para 6.18 – 6.19. Pedestrian and cycle routes from Towcester should be mentioned here and that any development must provide a traffic-controlled crossing point from the A5 across the A43.</p> <p>AL1N – (WNS/2021/1819/EIA 25.06 has + 6ha for sports pitches = 31.05 ha total)</p> <p>6.18 The development framework AL1(N) provides a number of key access points into the site off the A5 – a roundabout and a footpath east west. These include an access located to the immediate north of the Bell Plantation and an access half way along the northern field boundary where a new roundabout is to be located. New link roads to lead off these this access point to</p>		

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		<p>utilise all parts of the development areas, including an access to any sports pitches including a separate access road to any sports pitches to maintain user safety. (Under current plans the football pitch users (including visitors who will not know the area) will be expected to drive through a 24/7 logistics hub.)</p> <p>7</p> <p>6.19 The development framework AL1 includes new east west active travel routes that link the A5 footpath with PRoW SB1. Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of an eco-lighting plan and consistent use of wayfinding/signage should to be considered implemented which is sensitive to light pollution on the neighbouring rural area.</p> <p>Drainage</p> <p>6.20 The development framework AL1 sets out an integrated and attractive sustainable drainage network with swales located along woodland edges, the sports pitches, A43 frontage and a central green link, directing and filtering surface water to a series of basins located on the site's periphery. Any flood risk to the A5 and Bairstow's Lodge must be eliminated. The 6ha allocated to sports pitches must incorporate an integrated and attractive sustainable drainage network in order to prevent flooding on the A43, whether the pitches are located there or not.</p> <p>Opportunities for this network to offer ecological value should to be explored implemented as should the introduction of rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes.</p> <p>Ultimately the location of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.</p> <p>Green Infrastructure</p>		

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		<p>6.21 The development framework AL1 proposes green infrastructure that comprises a series of enhanced and new edges/belts of woodland/hedgerow planting and areas of green space. New substantial landscape edges/buffers, with tree planting are shown as a requirement along the northern, eastern and western perimeter to mitigate visual impact of any new buildings in the framework's northern area of development. Species of trees and hedgerows to be indigenous, and subject to legal agreement to require maintenance until such planting is fully established.</p> <p>6.22 A green link helps separate development in the northern and southern halves of the site, cutting east west across it. This link could comprise an active travel route and a SUDs basin situated within one of the areas of green space. An existing belt of juvenile woodland could be removed to ensure the link is overlooked by new buildings, enhancing its safety and accessibility. To preserve biodiversity and maintain visual and sound screening the coppice woodland dividing the two sites must be retained at its existing depth and density. A separate, dedicated active pedestrian/cycle travel route to be built alongside this green link to join with SB1.</p> <p>6.23 The southern half of the site is broken up by a series of narrower belts of landscape, these run north south separating new development from land earmarked for Towcester Football Club (TFC). The siting of TFC's pitches is not currently defined in policy, as such these could be accommodated in an alternative location if justified. If the sports pitches are not located on the 6ha allocated to TFC then development of those 6ha for small and medium size units must take place before the adjoining 25 ha in northern section are developed. See Page 66 para 6.7 (Topography) and para 6.10 (Views and Visual Sensitivity). This would mirror the Porsche development on 8</p>		



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		<p>the southern side of the A43 in the Tove Valley Business Park. The far northern section of the site closest to Caldecote should be the final area to be developed.</p> <p>6.24 This needs clarification – does it mean the southern end of the northern section opposite Bairstow's Lodge (along the east-west footpath) or the southern end by the football pitches on the A43 – or both?</p> <p>Building Height, Scale and Massing The reference to 16m is too high, these are not small or medium size and what does 'rising to' mean? is it the AOD height or the building height?</p> <p>6.25 Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 16m in height –and being effectively fully screened from sensitive views by either existing or proposed tree planting.</p> <p>10m ridge height is the maximum acceptable height and buildings with 10m heights and up to 5,000 sqm footprints should be set back from the site edges to minimise visual sensitivity from sensitive receptors.</p> <p>Buildings which have a greater impact ie are visible above tree cover / from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering deliver the highest design quality and a thorough programme of landscape measures which must be subject of a maintenance programme set out in a legal agreement.</p> <p>Placemaking / Urban Form</p> <p>6.26 The development framework AL1 suggests a series of key frontage opportunities across areas of new development, including along both the central green link / SUDs parkland, the A43, mirroring frontage on the southern side of the road. There should be screening alongside , and the A5 adjacent to an</p>		

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		<p>access to the northern area of development. These frontages would must require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building façade can be created.</p> <p>No high 10m buildings facades alongside the A5 will be accepted which would increase density and create an urban corridor, and block out light to Bairstows Lodge.</p> <p>New Section to be added for AL1S – new paragraph numbers needed</p> <p>Access &amp; Movement – AL1S – (Application WNS/2021/2168/MAO 31,800 sqm (3.18 ha))</p> <p>6.18a The development framework AL1S provides two key access points into the site off the A5. These include a new access point (point 7) located to the immediate north of the Bell Plantation and an access and a dedicated pedestrian/cycle access at the existing entrance to the Garden Centre. New link roads to will lead off these this vehicle access point to utilise all parts of the development areas, including an access</p> <p>9</p> <p>to any sports pitches. There are pedestrian/cycle links to the sports pitches which are only identified as 'potential' – there is currently no vehicle link. There is no legal obligation for the owners of AL1S to provide any link which should be provided by AL1N only.</p> <p>6.19a The development framework AL1 includes new east west active travel routes that link the A5 footpath with PRoW SB1. Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of an eco lighting plan and consistent use of wayfinding/signage should to be considered implemented which is sensitive to light pollution on the neighbouring rural area.</p> <p>Drainage</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6.20a The development framework AL1S sets out an integrated and attractive sustainable drainage network with swales located along woodland edges, the site's A43 frontage and a central green link, directing and filtering surface water to a series of basins located on the site's periphery. Opportunities for this network to offer ecological value should to be explored implemented as should the introduction of rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes. Ultimately the location of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.</p> <p>Green Infrastructure</p> <p>6.21a The development framework AL1 proposes green infrastructure that comprises a series of enhanced and new edges/belts of woodland/hedgerow planting and areas of green space. New substantial landscape edges/buffers, with tree planting are shown as a requirement along the northern, eastern and western perimeter to mitigate visual impact of any new buildings in the framework's northern area of development. Species of trees and hedgerows to be indigenous, and maintenance arrangements will be subject to legal agreement.</p> <p>6.22a A green link helps separate development in the northern and southern halves of the site, cutting east west across it. This link could comprise an active travel route and a SUDs basin situated within one of the areas of green space. An existing belt of juvenile woodland could be removed to ensure the link is overlooked by new buildings, enhancing its safety and accessibility. To preserve biodiversity and maintain visual and sound screening the coppice woodland dividing the two sites must be retained at its existing depth and density. Current application WNS/2021/2168/MAO proposes removing half the existing woodland on the East West link which is not acceptable</p>		

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		<p>6.23 (delete, the football pitches are not applicable to the 2021/2168 application.)</p> <p>6.24a The southern end of the site accommodates the key area of green space within the framework, potentially incorporating a SUDs basin. It is important given the</p> <p>10 topography that the location of the SUDs is specified given the potential flood risk to the A5, A43 and the Tove Valley Business park.</p> <p>Building Height, Scale and Massing (note – the application WNS/2021/2168/MAO is for 13m ridge height which is unacceptable)</p> <p>6.25a Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 16m in height 10m is the maximum to ridge height and being effectively screened from sensitive views by either existing or proposed tree planting. Large buildings over 5,000 sqm and 10m ridge height are unacceptable for this site. 10m ridge height should be defined as the maximum acceptable height and buildings with 10m heights should be set back from the site edges to minimise visual sensitivity from sensitive receptors.</p> <p>Any buildings which have a greater impact ie are visible above tree cover / from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering deliver the highest design quality and a thorough programme of landscape measures and the maintenance programme secured through legal agreement</p> <p>Placemaking / Urban Form</p> <p>6.26a The development framework AL1 suggests a series of key frontage opportunities across areas of new development, including along both the central green link / SUDs parkland, the A43, mirroring frontage on the southern side of the road, and</p>		

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		<p>the A5 adjacent to an access to the northern area of development. These frontages would must require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building façade can be created.</p> <p>Any larger buildings should be located away from the edges of any site to minimise visual impact.</p> <p>Site AL2 Development Framework 6.41-6.49 Page 70 -72 Surrounding Land Use &amp; Scale</p> <p>6.27 A cluster of uses, referred to as Bell Plantation (Garden Centre) is situated to the east of AL2 on the opposite side of the A5. Land uses include garden centre, nursery, vet and play centre. Buildings are relatively small in scale, ranging from 4-10 4-6.5 metres to ridge height.</p> <p>6.28 Jardine Select, a car forecourt is located to the south of AL2 and the other side of the Towcester Road. The building associated with this use is below road level, rising to approximately 8 metres in height.</p> <p>6.29 Linden Barn Food Shop, Towcestrians Sports Club and a series of agricultural buildings sit to the west of AL2, along or just off Towcester Road. The food shop sits approximately 200 metres west of the site and comprises a series of 5-7 metre high buildings which is only open to the public two mornings a week.</p> <p>11 The sports club sits approximately 250 metres to the north west of the site and comprises a single 1,000m2 building, approximately 6 metres high surrounded by sports facilities, including tennis courts and sports pitches.</p>		

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		<p>6.30 There are a number of office, retail, light industrial and distribution uses situated around to the south east of the Tove Roundabout, refer to section 3 for further details.</p> <p>6.32 The south eastern corner of the site is planted with semi-mature trees; this structured planting is likely to have been introduced as part of works associated with Tove Roundabout and provides an element of visual screening. These must be retained in the event of the A5 being widened.</p> <p>Flooding</p> <p>6.34 Along the western edge of the site flood zones 2 and 3 follows the watercourse. Zone 3 is contained within the watercourse itself with zone 2 spreading no further than 10 metres into the south western corner of the site. The south eastern section of this field feeds into the flood zone affecting Towcester. There must be no risk of AL2 exacerbating this risk.</p> <p>Access &amp; Movement</p> <p>6.36 There is a continuous, at grade frontage of approximately 120 metres onto the A5, along the eastern edge of the site. There is a continuous, at grade frontage of approximately 180 metres onto Towcester Road, along the southern edge of the site. The only access point is from the narrow Towcester/Greens Norton Road. There is no footpath at this point.</p> <p>6.37 A footpath runs along the eastern edge of the A5, providing a continuous footpath that links into the centre of Towcester. There is currently no safe crossing point to that footpath over the A5 or A43 and is separated from that footpath by the 5 arm Tove roundabout. There are no footpaths along Towcester Road nor any footpaths on the western side of the A5, therefore no pedestrian or cycle access.</p> <p>Heritage</p>		

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		<p>6.39 AL2 is roughly 1km west of the boundary of the Registered Park and Garden/Conservation Area of Easton Neston House, with the A43, housing and employment development situated between it and the protected estate. AL2 sits on the alignment of a tree-lined avenue in front of the House, this once provided provides a visual link from the House to the church spire in Greens Norton which is an important view and forms an 'eyecatcher' (i.e. a distant feature deliberately incorporated as an intentional view within the design of a park). Although any relationship is largely severed by intervening development Future proposals for AL2 should consider protect views along this alignment when preparing the arrangement, height and massing of any built form.</p> <p>Page 72 – AL2 Framework 12 Access &amp; Movement</p> <p>6.41 The development framework AL2 provides a key access point into the site off Towcester Road / Greens Norton Road, from the south. The access is to be sited at least 100 metres from Tove Roundabout. Independent assessment is required to establish safety and viability of this access point, road width and the approach to allow safe crossing of the Tove roundabout.</p> <p>6.42 Active travel provision to the site is currently provided along the existing footpath on the A5. In addition to ensuring safe, comfortable and direct connection to this path for pedestrians any development should also explore provide a new safe signal pedestrian connection to Tove Roundabout from along Towcester Road. This crossing must not impede the traffic flow on the Tove Roundabout, particularly travelling west or cause back up of traffic across the roundabout itself and block the A5 north exit. This additional crossing must work with the existing signal-controlled pedestrian crossing on the</p>		

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		<p>eastern side of the A43 which is used to access the A5 north from Towcester.</p> <p>6.43 Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of an eco-lighting plan and consistent use of wayfinding/signage should be considered implemented which minimises light pollution.</p> <p>Drainage</p> <p>6.44 The development framework AL2 sets out an integrated and attractive sustainable drainage network with swales located along green and woodland edges directing and filtering surface water to a basin located on the site's periphery.</p> <p>Opportunities and the 10% requirement for biodiversity net gain for this network to offer ecological value should be explored implemented as should the introduce rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes.</p> <p>Green Infrastructure</p> <p>6.45 The development framework AL2 proposes introducing new tree planting to reinforce the northern, eastern and southern all edges of any new development and to separate the buildings within the site to prevent overly dense development. These will link up to the existing treelined watercourse along the western edge of the site and extensive belt of tree planting along Towcester Road.</p> <p>The depth of these green areas, woodland and planting must be clearly defined in metres and included in any masterplans.</p> <p>6.46 In addition the development framework AL2 shows the inclusion of green space along the edges of any development with a larger green space at the south western corner, incorporating a SUDs basin. These will allow for any development to be setback from the enhanced planted boundary treatments.</p>		



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		<p>The surrounding belts must be specified and defined in terms of width, height and planting. Maintenance of all planting to be secured by legal agreement.</p> <p>13</p> <p>Height, Scale and Massing</p> <p>6.47 Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 10-12 metres in height, to a maximum height of 10m and being effectively screened from sensitive views by either existing or proposed tree planting. The site's size and proximity to development of a moderate scale adjacent to the Tove Roundabout is likely to will prohibit large buildings which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit. Buildings up to 10m AOD should be located in the centre of the site to reduce visual impact with appropriate screening.</p> <p>These will only be considered in exceptional circumstances if acceptable mitigation is provided such as delivering the highest design quality and thorough programme of landscape measures.</p> <p>Placemaking / Urban Form</p> <p>6.48 The development framework AL2 suggests a key frontage opportunity onto the Tove Roundabout and along Towcester Road. These frontages would require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building facade can be created. This must be compatible with the vision of an attractive 'northern gateway' to Towcester (see page 34 para 3.23). The enhanced planting section at the north east section of AL2 should be extended to the south east corner.</p> <p>6.49 There may be an opportunity to address stretches of the site's A5 &amp; Towcester Road frontage, adjacent to the</p>		

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		<p>roundabout with a bolder form and scale. Building orientation &amp; treatment and landscape proposals could help contribute a new gateway frontage into Towcester. Development on AL2 must respect Objective 9 of the Local Plan regarding high quality design that is respectful to heritage assets and their settings. It should contribute to a new gateway frontage into Towcester by retaining and enhancing dense screening to eliminate clutter on the Tove roundabout.</p> <p>Site AL4 Development Framework 6.60 – 6.67 Current planning application (S/2020/2337/MA0) The developers for the current planning application (S/2020/2337/MA0) for this site (Clowes) intend to buy a much larger piece of land if its planning application is successful and originally submitted a blue line application for that larger site. It included that land on Prime Location advertising implying that it would become available. Government guidelines (NPPF) state that sustainability is at the heart of all planning decisions, not only for an initial application for development on the allocation site but future applications. Therefore, should a business prove successful, there would need to be an assessment of whether the expansion of the business on that site will still meet the criterion of sustainable development. Sustainability covers traffic and visual impact and given the ownership implications for Shacks Barn AL4; this wider assessment should be required.</p> <p>14 Page 30 paras 3.13 to 3.15 SUDs need to be provided within the existing 10 hectare allocated site per LP2, the developer's proposal and application S/2020/2337/MA0 to site the SUDs outside of the 10h, thereby enlarging the allocated area by 28%, would lead to over</p>		

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		<p>development of the site. Given the sensitive nature of its location this should not be permitted.</p> <p>The SPD as currently proposed would facilitate the largest of the units in the current application, (6968m<sup>2</sup> x 15m) which are intended as warehousing with 16 bays for HGVs. It is this aspect of the proposed development on AL4 that must not be allowed to proceed through wording in the SPD. Application S/2020/2337/MAO locates these largest units in the area of maximum sensitivity as identified in the SPD.</p> <p>As has already been made clear the definition of medium sized units as up to 8000m<sup>2</sup> is unacceptable as it bears no relationship to the precedent set in the surrounding area. Specifically, the developments at Silverstone Circuit (the motor sport technology industry there being one of the justifications for AL4) which are a maximum of 5,000m<sup>2</sup>.</p> <p>Given its prominence in the landscape, being high on the Whittlewood/Yardley Ridge and visible from the North, West and South for many miles around the maximum permitted height at AL4 should be no higher than the existing buildings on the site. The land for AL4 rises above the existing units at Shacks Barn and 10m on this site is too high. 15m is unacceptable and facilitates warehousing which has the additional problem of lack of access on the South side of the A43.</p> <p>AL4 Technology corridor 3.13.</p> <p>Current existing units at Shacks Barn (referred to as Silverstone Business Park) are 250m<sup>2</sup> to 1200m<sup>2</sup>. Silverstone Fields on the opposite side of the A43 on a visually less prominent site has units up to 2,500m<sup>2</sup>. There should be no units larger than 2,500m<sup>2</sup> at AL4 given the precedent for this location and the access difficulties for HGVs.</p> <p>3.14.</p>		

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		<p>Units at Silverstone Park (adjacent to the Circuit) are between 250m<sup>2</sup> and 5000m<sup>2</sup>. Reference is made to the scale and form of these buildings being heavily informed and in scale to buildings within the circuit. A similar link must be made to assess the suitable scale and form for AL4 in relation to the existing development at Shacks Barn.</p> <p>Note: the Silverstone Circuit development is not in a visually impactful site and has good access to the A43 with very limited direct impact on residential areas -unlike AL4 that will require access via Silverstone village and encourage rat-running through Whittlebury and along Cowpastures Lane.</p> <p>15 Page 50 Page 74 para 6.55 Page 76/77</p> <p>3.15 notes that there is a corridor of technology related employment emerging on this stretch of the A43 (between Shacks Barn, Silverstone Fields and Silverstone Circuit). It fails to note that there is no easy dual carriageway access between Silverstone Circuit and AL4. There is no justification for units of a scale that will facilitate warehousing relating to technology employment at AL4. What purpose in relation to Silverstone Circuit will they serve? What route will they use as access between the two sites? If such warehousing is needed, why is it not located at Silverstone Circuit closer to point of production and less impactful both visually and on local roads?</p> <p>Visual Summary</p> <p>The authors noted that not all the PRoW were covered in their research. Located as it is on the Yardley/Whittlewood Ridge, AL4 can be seen for several miles around and from Abthorpe, Gayton, Silverstone and Greens Norton. There are many unreferenced receptors along Whittlebury Road and from footpaths between Whittlebury and Silverstone. Much more</p>		

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		<p>work required on visual receptors as the SPD is currently misleading about the impact.</p> <p>AL4 Site assessment</p> <p>6.55 notes the visual sensitivity from the South and West but fails to note the sensitivity from the North (referenced above).</p> <p>AL4 Development framework</p> <p>The plan shows the development falling entirely within the allocated 10ha including the SUDS. If this is applied to the site it is to be welcomed. The current planning application has the SUDS on separate land outside the allocated area which is encouraging over development. Reference should be made to this requirement within paragraph 6.61</p> <p>Access &amp; Movement</p> <p>6.60 There is insufficient reference to the extreme difficulty of access to this site. In addition to the lack of direct access to the south side of the A43, there is no current bus service, nor are there footpaths or safe cycling routes.</p> <p>The acknowledged problems of additional traffic using the A413 past two schools in Silverstone and one in Whittlebury is not addressed. Nor is the cumulative traffic impact of all the A1- 5 developments that will increase traffic loads on narrow roads through Whittlebury towards Silverstone and Buckingham and on Cowpastures Lane. The A413 is not suited to HGVs, nor are local rural roads: they need direct access to the A43/M1/M40.</p> <p>Green Infrastructure</p> <p>16</p> <p>6.62 Screening on all sides needs to be provided within the site boundaries due to the location on the ridge lending high visibility - the sight lines indicated do not extend far enough as, because of its position on the ridge, the location is visible from footpaths further away.</p> <p>Figures 49 – 60 (pages 52 to 55) The enhanced planting would need to be specified, time-scaled and enforced in relation to</p>		

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		<p>permissions being given to each section of the development. The most recent amendment to the current application confirms that it would take 15 years for mature growth to provide screening. This is clearly far too long.</p> <p>Heights, Scale and Massing  6.65. Heights of 10-15 metres are unacceptable on this highly visible site. Heights should be in line with the current maximum at that location at Shacks Barn. Final sentence should read This may see development rise to a maximum that does not exceed 7.5 metres in height.</p> <p>6.66 This paragraph regarding 'Large Units' should be removed as it introduces new policy.</p> <p>Additionally  Light and noise pollution in an area currently not lit at night and with near neighbours is not covered.</p> <p>The impact of the site on the rural business at Lordsfield Farm is not covered.</p> <p>Site AL5 Development Framework  6.85 – 6.93  Whilst Save Towcester Now is not responding on AL5 the cumulative traffic impact of all the developments AL1-5 is of grave concern. There is no coherent plan for the traffic generated by these sites to travel on the single carriageway north/south, nor for alleviating the already congested A43 round Towcester town. Instead, further congestion will follow when more roundabouts are added to the A43 driving more road users to seek dangerous alternatives. When the M1 is blocked, as happens regularly, and during rush hour when there are lengthy tailbacks along the A5, traffic seeks alternative routes through rural villages totally unsuited to the loads they are expected to take. Page 84  Exemplar development</p>		

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		<p>Will planning applications be rejected if they fail to meet the 'exemplar' standards? This should be specified/explained.</p> <p>Please find attached the formal detailed response from Save Towcester Now (STN) to the July 2022 Supplementary Planning Document, which has been advised by an independent Planning Consultant.</p> <p>STN has a following of 983 members with 3,957 petition signatures to save our town and the surrounding countryside from inappropriate, large scale development. We therefore welcome the introduction of this SPD to "reducing uncertainty" and to provide "clear guidance on what is expected from future developments". We are only sorry that AL3 has been excluded as it is clearly against the spirit and intent of the Local Plan(2) and precisely the sort of development the SDP is intended to prevent. Therefore it is of paramount importance that the heights and footprints which have been allowed on AL3 are not permitted on the AL1/2/4 developments. We have concentrated on AL1/2/4, but acknowledge that the traffic generated from AL5 will negatively impact on the A5, the relief road, A43, Abthorpe/Towcester roundabouts as well as the wider local road network.</p> <p>In addition to the attached we wish to make the following additional comments:-</p> <ol style="list-style-type: none"> <li>1. The wording for the Design Principles needs to be much clearer, the SPD is</li> </ol>		

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		<p>currently littered with 'may', 'should', 'seek to', 'where possible', 'explore', 'look to', 'could' - all too vague and open to interpretation by the developers of AL1/2/4 and contradict the 1.12 SPD aim to "provide a robust and clear development framework with clear, specific development principles to inform the preparation and determination of planning applications".</p> <p>2. Employment offering: Remove 'in part' from page 24 para 3.2 and ensure that all 5 employment criteria stated in the Local Plan(2) are applied to the AL developments. The LP's aim was "to attract new investment and provide more jobs to match the skills of local people" (page 20) which large scale, B8 warehousing fails to meet. The skills and education attainment of Towcester and South Northants are significantly higher than those of West Northants therefore employment emphasis should be on skilled, managerial and professional, high performance technology - which exploits our rich regional history of applied Research and Development in areas such as automotive advanced manufacturing. B8 risks lowering rather than raising aspirations with all the attendant negative economic and social consequences for this area.</p> <p>3. Modal Shift: The Local Plan(2) aims to reduce out commuting and encourage pedestrian/cycle use to access work. B8 warehousing will not address this, indeed it will generate in-commuting from workers based outside the locality.</p>		



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		<p>4. Footprints:- The Local Plan(2) allocated these sites for 'small and medium sized units' and that is what should be built. Large Scale buildings must not be accepted on these sites. The SPD (page 39) defines 'Large' units as 8,000 sqm to infinity - clearly unacceptable, but also inadmissible as it introduces new policy. 5,000 sqm must be the maximum acceptable footprint on any site based on the local precedents.</p> <p>5. Control:- Wording must also be included in the SPD to ensure that smaller/medium buildings cannot be joined up at later dates to form larger units.</p> <p>6. Heights:- No building to be taller than any existing building on a nearby site, ie for AL1/2 this is site 4 (page 28 of the SDP) and for AL4 this is site 6/Shacks Barn (page 30). Ridge heights should be no more than 10m AOD for AL1/2, and 7.5m AOD for AL4.</p> <p>7. Context: Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester and should not be used as a precedent. NB Swan Valley is defined as a 'Strategic' development under the WNJCS, whereas the AL1-5 sites were specifically identified as 'non-strategic' for the purpose of Local Plan (2).</p> <p>8. Traffic: Much greater detail is required in the SPD of a Cumulative Traffic Impact Assessment on the A5/A43, Tove/Abthorpe roundabouts and surrounding local</p>		

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		<p>roads; not just from the allocations but after the relief road is open; when the M1 is closed or has hold ups; the SUE Towcester Vale houses are completed, and once AL3 is operational. The SPD needs to require that any site applications must include cumulative traffic assessment across all these effects, not just an assessment on the access for the specified proposal.</p> <p>9. Health: The SDP should also set pollution and noise limits generated from these sites and ensure good air quality in Towcester and the surrounding villages within a minimum 5 mile radius. Large scale warehouse developments are not compatible with these important environmental and health requirements.</p> <p>9. Heritage: Greater reference should be made in the SPD to protect the area's local heritage from the substantial harm large scale warehousing and over-development will cause. Towcester dates from the Iron Age and is therefore acknowledged as the oldest town in Northamptonshire. It was occupied by the Romans as Lactodurum adjoining Watling Street (the main Roman Road running North West from London); Bury Mount evidences Norman connections and the town was used as the Royalist headquarters during the Civil War; nearby Easton Neston House (Grade 1 listed) dominated the local countryside through the last 5 centuries providing employment, housing, and the race course.</p>		

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		<p>10. AL3 – This site (Tiffield Lane) should also be subject to the same SPD conditions on future developments within that site. Importantly the heights already permitted on AL3 (21.5m building, therefore 27.5 AOD) must not be used by AL1/2/4 developers as existing precedent for their sites.</p> <p>11. Screening using trees must be large scale, and maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable screening.</p> <p>12. Boundaries The importance of all the proposed buildings and associated infrastructure such as planting and SUDs needs to be within the allocation site area (which is not the case for AL4).</p> <p>We would be happy to meet with you to discuss this email and the attached response. Please acknowledge safe receipt. Save Towcester Now</p>		
SPD198	Hayden Shirley	<p>AL5 Land at Former Further Pit, Old Stratford /Cosgrove. This proposed development is totally wrong for this position for many reasons .. it is located on a narrow country road, with narrow access from the A508. This access is only a few hundred yards from the Old Stratford roundabout which is extremely busy from all directions, but in gridlock at rush hour times. Also if there is a problem on the M1 the traffic diverts on to A508 and A5 which causes serious congestion for long periods.</p>		

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		<p>The development is proposed across the road from residential bungalows, and a scout camp which is used by young children , posing many dangers and disturbance.</p> <p>The site is bordered on one side by ancient hedgerow, and on the other is the Buckingham Arm of the Grand Union Canal, so industrial development will have a huge impact destroying the natural environment and wildlife.</p>		
SPD199	Mark Olejnik	<p>With reference to the amended plans for the warehousing at Shacks Barn, my previous objection still applies. Even forgetting the size and intrusive nature of the development, the traffic issue alone must cause the most serious misgivings about the plan. Without a commitment to enabling large numbers of heavy goods vehicle journeys to be channelled straight onto the A43 by changing the configuration of the junction, the A413 will become even busier and the lives of large numbers of people living along the route will be permanently blighted.</p> <p>I do hope that the Council will consider the impact this will have on ordinary people and refuse this illconsidered development.</p>	<p>The Local Plan Part 2 allocates these sites for employment purposes.</p> <p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			impacts on the roads would be severe.	
SPD200	Christine Pearson	<p>As a resident of I am writing to comment on the Supplementary Planning Guidance (SPG) for the Employment Allocation sites in the South Northamptonshire Local Plan Part 2. I am concerned that developments AL1 and AL 2 (the DHL site) will continue to threaten the rural nature of Tiffield and Caldecote. The following changes are needed to the guidance:</p> <p>1. Change 1 – remove imprecise language which is open to exploitation by developers.</p> <p>Much of the terminology in the SPG document is woolly and gives too much room for developers to exploit the various development sites, contrary to the spirit of the Part 2 Local Plan in meeting the demand for small and medium sized units. For example, page 38 states</p> <p>“The presumption will be for the accommodation, across the employment sites of a mix of small, medium and in exceptional circumstances, large sized units, as defined above.” The highlighted phrase should not be in the guidance.</p> <p>2. Change 2 – consider the if need for mitigation is valid</p> <p>The Guidance implies that the whole emphasis is on mitigation rather than not having the large buildings in the first place for example page 67 states</p> <p>“Large buildings, which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering the highest design quality and a thorough programme of landscape measures.”. No building should be taller than any existing building on a nearby site, ie for AL1/2 this is site 4 (page 28 of the SPG). We should not be relying on ‘mitigation’ measures for buildings that are</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>inappropriate in the first place. Any screening trees planted must be maintained or it will not thrive and be useless.</p> <p>3. Change 3 – consider if massive warehousing meets local need The SPG will not meet local demand and strengthen the rural economy if it encourages B8 warehousing. In particular, it will generate in-commuting from workers based outside the Towcester area increasing traffic flows.</p> <p>4. Change 4 - The Tiffield Lane site (AL3) should also be subject to the same final SPG conditions as all other sites, As I understand the planning application was outline only. Any future developments within AL3, importantly the heights already supposedly permitted, must not be used by AL1/2 developers as existing precedent for their sites.</p> <p>5. Change 5 – Act on the need for holistic traffic projections In all of the guidance there is the continued presumption that the local road network is fit for purpose in handling all the extra traffic from AL1 to 5 (and any future housing developments) will create. Given the traffic congestion that can occur at peak times or when the M1 is closed or subject to lane restrictions, this premise is flawed. The proposed Towcester relief road will not ease congestion on the Tove roundabout from the A5 North. The projected traffic movements on all the developments need to be considered together to protect local residents from air quality problems and congestion. Tiffield and Caldecote in particular need to have their small rural roads protected from extra traffic of all types. I support the Save Towcester Campaign and would commend any feedback from them made to this SPG. I also draw your attention to any submission Tiffield Parish Council may make on residents' behalf.</p>	<p>development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>
SPD20 1	Fiona Threfall	I write to voice our concern at the proposed development at Shacks Barn in Silverstone based on	The Local Plan Part 2 requires a transport assessment and travel plan	The SPD will be

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		<p>the following:</p> <p>Traffic – The SPD should require that a cumulative traffic assessment be carried out for ALL sites. We all know how congested the Towcester roundabouts become and that our villages are used as rat runs. We are VERY concerned that large numbers of HGVs will be using the A413 through Silverstone.</p> <p>BUILDING FOOTPRINTS – The original Local Plan allowed for small and medium size units only. The draft SPD is now introducing large units. This means 8,000m<sup>2</sup> and over, with no top limit. The max size at the Circuit is 5,000m<sup>2</sup>. We want the SPD to ensure that only small and medium size units are built and that the maximum size is 5,000m<sup>2</sup>.</p> <p>HEIGHTS – The SPD has introduced specific building heights. At Shacks Barn this is up to 15m high, Bell Plantation is up to 16m (but built on a 7m high platform) and Woolgrowers is 12m. No amount of planting will hide any of these, the buildings will be illuminated 24/7 and visible for miles. The existing highest building locally is 9.5m. We want all the new builds to have a maximum height of 10m.</p>	<p>to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local</p>	<p>amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			<p>supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	
SPD202	Jeanne Ford	<p><b><u>ALS - LAND AT FORMER FURTHO PIT, OLD STRATFORD/COSGROVE</u></b></p> <p>I am extremely concerned about the proposed industrial development at the above site.</p> <ol style="list-style-type: none"> <li>1. The rural environment will be badly affected. At present, the wild life at this location is very active aided by the existing trees and hedgerows.</li> <li>2. New building works and construction traffic will create considerable pollution, dust and disturbance to the adjacent residential properties and the large scout camp directly opposite the proposed development.</li> </ol>	<p>The land at AL5 is allocated within the Local Plan Part 2 for employment purposes. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include any impacts on the scout camp and heritage. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. A Construction Management Plan would be a requirement of any future planning permission.</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>3. It is surprising that this virgin site has been chosen for such a large development especially as there is a conservation area less than a quarter of a mile away in the village itself.</p> <p>4. Normal traffic is heavy at peak times due to commuters travelling to and from work and is made worse when traffic is diverted on to the A508 due to road works and accidents on the M1. The proposal for a new junction to give access to the site will inevitably add to this congestion causing extra delays and possible grid lock. Should the application be successful it will be essential for all construction traffic to be banned from the existing turn to Cosgrove to protect the residents from noise, dust and pollution.</p> <p>5. The outline plan shows the industrial units extremely closely packed together. This would, not only be impractical but would surely be a fire hazard.</p>		
SPD203	Derek Ford	<p><b><u>ALS - LAND AT FORMER FURTHO PIT, OLD STRATFORD/COSGROVE</u></b></p> <p>I am extremely concerned about the proposed industrial development at the above site.</p>	<p>The land at AL5 is allocated within the Local Plan Part 2 for employment purposes. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will</p>	<p>No changes necessary.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The rural environment will be badly affected. At present, the wild life at this location is very active aided by the existing trees and hedgerows. New building works and construction traffic will create considerable pollution, dust and disturbance to the adjacent residential properties and the large scout camp directly opposite the proposed development. It is surprising that this virgin site has been chosen for such a large development especially as there is a conservation area less than a quarter of a mile away in the village itself. Normal traffic is heavy at peak times due to commuters travelling to and from work and is made worse when traffic is diverted on to the A508 due to road works and accidents on the M1. The proposal for a new junction to give access to the site will inevitably add to this congestion causing extra delays and possible grid lock. Should the application be successful it will be essential for all construction traffic to be banned from the existing turn to Cosgrove to protect the residents from noise, dust and pollution. The outline plan shows the industrial units extremely closely packed together. This would, not only be impractical but would surely be a fire hazard.</p>	<p>need to be mitigated to the satisfaction of the decision maker. This will include any impacts on the scout camp and heritage. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. A Construction Management Plan would be a requirement of any future planning permission</p>	
SPD20 4	Paul Parsons	4 The SPD sets out a number of overarching design principles. Do you agree with these?	The scope of the SPD is to establish general guidance and design	Additional wording will

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No</p> <p>Please provide comments to support your answer: The 12 'Overarching Design Principles' for all 4 sites (paragraph 5.3) are the key considerations for any planning application submitted (or submitted and not yet determined) for all of the sites. They are worded in general terms with further specifics given separately for each site later in the document. Two should be added with regard to 'traffic impact assessment' and 'electric charging'.</p> <p>These principles should be numbered and made more prominent in the document e.g. by a coloured text box. The wording of each should be reassessed and made stronger.</p> <p>Changes needed (deletions shown and additions in bold): New development for all each of the four allocated employment sites should will:</p> <ol style="list-style-type: none"> <li>1. Support Local Plan policy to deliver high quality small and medium scale development that is respectful of its setting within the boundaries of the allocation sites. This is core to the effectiveness of LP2.</li> <li>2. Provide evidence of cumulative impacts on the wider road network and key junctions/roundabouts as well as assessing the local impact of increased traffic arising from the development proposed.</li> <li>3. Ensure that development platforms are created to reduce the impact of the scale and massing of buildings on local character and the setting of the site, either in response to their height and/or the long &amp; uniform ridge lines they may introduce.</li> <li>4. Seek to Minimise any visual overbearance on short distance views, through immediately effective measures such as landscape screening and</li> </ol>	<p>principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Other local plan policies will also apply to the determination of planning application such as ecology and green infrastructure and sustainable drainage systems.</p>	<p>be added to the SPD to reflect the need to mitigate against the impacts of climate change. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer</p>

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		<p>elevational treatment, and avoid significantly altering the character of middle or long distance views.</p> <p>Add</p> <p>Ridge heights must be measured in combination with "Above Ordnance Datum" (AOD) and site topography. AOD provides a standardised measure of height across sites (usually relative to sea level). Where a site slopes, developers may not create plateaux on the land to elevate buildings above road level. Plateaux must be excavated to AOD road level to reduce visual impact on the neighbourhood. A ridge height limit of 10m in relation to existing road levels is therefore essential to prevent overbearance.</p> <p>5. Incorporate high quality design solutions (including the use of material, colour palette, and/or architectural articulations) and landscaping to reduce the impact of building heights.</p> <p>6. Recognise and Enhance existing landscape features and planting, where possible using traditional field patterns and woodlands as design inspiration. Provide high quality large scale and immediately effective planting to the boundaries of the site within the confines of the existing allocation site.</p> <p>7. Where possible Contribute to the area's wider green network, including rights of way, habitat corridors and linkages. At least 10% biodiversity net gain will be provided on all sites in line with the requirements of the Environment Act 2021.</p> <p>8. Use existing and provide new footpath, cycle, and road networks to support and encourage sustainable travel and promote modal shift to the site from local residential areas and around the site.</p>		<p>applicants towards more ambitious design standards.' Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being</p>

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		<p>9. Ensure the council and public transport operators are consulted to help explore ensure proposals opportunities for funding public transport improvements, including frequency and access to services for future employees and providing new services where applicable.</p> <p>10. Seek Provide definitive plans opportunities to address the existing appearance of the road network in a positive manner, be that through new active building frontage and decorative planting or and the retention and enhancement of existing native planted boundaries/edges.</p> <p>11. Seek to visually break up New areas of parking will incorporate with specified planting, areas of permeable material and SUDs features such as dry or wet swales, allowing the absorption and channeling of surface water.</p> <p>12. Look to Integrate movement, landscape and SUDs networks within the site by combining new or retained tree planting/hedgerow and SUDs provision along new roads.</p> <p>13. Limit the impacts on tranquility of each site's rural setting, this includes minimizing/mitigating any light, noise &amp; air pollution or visual clutter (i.e. advertising, corporate livery and logos) resulting from the future operation of new buildings.</p> <p>14. Provision of electric charging points in carparks will be required to the most up to date standards.</p> <p>Paragraph 5.2 gives a get-out clause saying that a 'clear justification' can be given if the proposal does not reflect them. This wording should be stronger, there is no reason why any proposal should breach these overarching design principles at all, given their general wording, even if an exemplar development is proposed.</p>		<p>considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Should be worded 'These principles must be reflected in any development proposed for the four employment sites. No justification will be accepted for any development proposal that does not fulfil these general design principles.'</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer: Each of the sites should have an 'Assessment' and a 'Development Framework' Section. The headings are inconsistent. The Development Framework should have numbered development requirements highlighted in the text. As presented, it is not clear what is a development principle, there are just paragraphs. The wording of these development principles should be tightened up so its intent is clear and unambiguous...many are worded as descriptive rather than prescriptive. 'Should/will' to replace 'could'.</p> <p>Page 66 (proposed changes shown as strike through for deletions and bold for additions of text) Surrounding Land Use and Scale</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6.1 The site comprises 9.71ha with a cluster of uses on 6.5ha, referred to as The Bell Plantation are situated within the south western corner of the site on 6.5 ha, uses include garden centre, nursery, vet and play centre. Buildings are relatively small in scale ranging from 4-10 4-6.5 metres to ridge height. The northern section of the AL1 site comprises 25 ha of fields, formerly agricultural use.</p> <p>6.2 Brickyard Farm, including farmhouse and ancillary buildings is situated on the eastern edge of the site. Primary use is Brickyard Farm Dog Kennels, and Restful Pets (Pet cremations) which was established in 2002.</p> <p>A complex of buildings, referred to as Bairstows Lodges are situated along the A5 to the west of the site. Bairstows Lodge is an occupied residence located on the western side of the A5 opposite the south-western corner of this site. Next to Bairstows Lodge is a complex of buildings, formally Jack's Café. One building is used by Berry Cranes.</p> <p>6.6 The scale of tree belts varies but more substantial mature tree belts are an approximate height of 20m. Tree screening is limited to non-existent along the section abutting the A5 and will need to be replanted to screen the development from the A5 and sensitive visual receptors.</p> <p>Heritage Add that AL1 runs next to Watling Street (Roman Road) – A5. Site AL1 Development page 68 General comments – It is important to separate the two applications on AL1 and rename to avoid confusion ie AL1(N) and AL1(S) referring to AL1 North</p>		

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		<p>development by DHL which includes the 6ha land for the potential football pitches; and AL1 South which is the site developed by the Warren Family who own the Bell Plantation Garden Centre. Each site is allocated in the Local Plan for development for a mix of small and medium units.</p> <p>To maintain the separation of both sites and to preserve biodiversity and improve visual and sound screening the coppice woodland dividing the two sites must be retained at its existing depth and density, contrary to the point at 6.22.</p> <p>Access &amp; Movement  Para 6.18 – 6.19. Pedestrian and cycle routes from Towcester should be mentioned here and that any development must provide a traffic-controlled crossing point from the A5 across the A43.</p> <p>AL1N – (WNS/2021/1819/EIA 25.06 has + 6ha for sports pitches = 31.05 ha total)</p> <p>6.18 The development framework AL1(N) provides a number of key access points into the site off the A5 – a roundabout and a footpath east west. These include an access located to the immediate north of the Bell Plantation and an access half way along the northern field boundary where a new roundabout is to be located. New link roads to lead off these this access point to utilise all parts of the development areas, including an access to any sports pitches including a separate access road to any sports pitches to maintain user safety.</p> <p>(Under current plans the football pitch users (including visitors who will not know the area) will be expected to drive through a 24/7 logistics hub.)</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6.19 The development framework AL1 includes new east west active travel routes that link the A5 footpath with PRoW SB1. Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of an eco-lighting plan and consistent use of wayfinding/signage should to be considered implemented which is sensitive to light pollution on the neighbouring rural area.</p> <p>Drainage</p> <p>6.20 The development framework AL1 sets out an integrated and attractive sustainable drainage network with swales located along woodland edges, the sports pitches, A43 frontage and a central green link, directing and filtering surface water to a series of basins located on the site's periphery. Any flood risk to the A5 and Bairstow's Lodge must be eliminated. The 6ha allocated to sports pitches must incorporate an integrated and attractive sustainable drainage network in order to prevent flooding on the A43, whether the pitches are located there or not. Opportunities for this network to offer ecological value should to be explored implemented as should the introduction of rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes. Ultimately the location of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.</p> <p>Green Infrastructure</p> <p>6.21 The development framework AL1 proposes green infrastructure that comprises a series of enhanced and new edges/belts of woodland/hedgerow</p>		

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		<p>planting and areas of green space. New substantial landscape edges/buffers, with tree planting are shown as a requirement along the northern, eastern and western perimeter to mitigate visual impact of any new buildings in the framework's northern area of development. Species of trees and hedgerows to be indigenous, and subject to legal agreement to require maintenance until such planting is fully established.</p> <p>6.22 A green link helps separate development in the northern and southern halves of the site, cutting east west across it. This link could comprise an active travel route and a SUDs basin situated within one of the areas of green space. An existing belt of juvenile woodland could be removed to ensure the link is overlooked by new buildings, enhancing its safety and accessibility. To preserve biodiversity and maintain visual and sound screening the coppice woodland dividing the two sites must be retained at its existing depth and density. A separate, dedicated active pedestrian/cycle travel route to be built alongside this green link to join with SB1.</p> <p>6.23 The southern half of the site is broken up by a series of narrower belts of landscape, these run north south separating new development from land earmarked for Towcester Football Club (TFC). The siting of TFC's pitches is not currently defined in policy, as such these could be accommodated in an alternative location if justified. If the sports pitches are not located on the 6ha allocated to TFC then development of those 6ha for small and medium size units must take place before the adjoining 25 ha in northern section are developed. See Page 66 para 6.7 (Topography) and para 6.10 (Views and Visual</p>		

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		<p>Sensitivity). This would mirror the Porsche development on the southern side of the A43 in the Tove Valley Business Park. The far northern section of the site closest to Caldecote should be the final area to be developed.</p> <p>6.24 This needs clarification – does it mean the southern end of the northern section opposite Bairstow's Lodge (along the east-west footpath) or the southern end by the football pitches on the A43 – or both?</p> <p>Building Height, Scale and Massing The reference to 16m is too high, these are not small or medium size and what does 'rising to' mean? is it the AOD height or the building height?</p> <p>6.25 Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 16m in height –and being effectively fully screened from sensitive views by either existing or proposed tree planting.</p> <p>10m ridge height is the maximum acceptable height and buildings with 10m heights and up to 5,000 sqm footprints should be set back from the site edges to minimise visual sensitivity from sensitive receptors. Buildings which have a greater impact ie are visible above tree cover / from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering deliver the highest design quality and a thorough programme of landscape measures which must be subject of a maintenance programme set out in a legal agreement.</p> <p>Placemaking / Urban Form</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6.26 The development framework AL1 suggests a series of key frontage opportunities across areas of new development, including along both the central green link / SUDs parkland, the A43, mirroring frontage on the southern side of the road. There should be screening alongside , and the A5 adjacent to an access to the northern area of development. These frontages would must require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building façade can be created.</p> <p>No high 10m buildings facades alongside the A5 will be accepted which would increase density and create an urban corridor, and block out light to Bairstows Lodge.</p> <p>New Section to be added for AL1S – new paragraph numbers needed</p> <p>Access &amp; Movement – AL1S – (Application WNS/2021/2168/MAO 31,800 sqm (3.18 ha))</p> <p>6.18a The development framework AL1S provides two key access points into the site off the A5. These include a new access point (point 7) located to the immediate north of the Bell Plantation and an access and a dedicated pedestrian/cycle access at the existing entrance to the Garden Centre. New link roads to will lead off these this vehicle access point to utilise all parts of the development areas, including an access to any sports pitches. There are pedestrian/cycle links to the sports pitches which are only identified as 'potential' – there is currently no vehicle link. There is no legal obligation for the owners of AL1S to provide any link which should be provided by AL1N only.</p>		

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		<p>6.19a The development framework AL1 includes new east west active travel routes that link the A5 footpath with PRoW SB1. Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of an eco lighting plan and consistent use of wayfinding/signage should to be considered implemented which is sensitive to light pollution on the neighbouring rural area.</p> <p>Drainage</p> <p>6.20a The development framework AL1S sets outs an integrated and attractive sustainable drainage network with swales located along woodland edges, the site's A43 frontage and a central green link, directing and filtering surface water to a series of basins located on the site's periphery. Opportunities for this network to offer ecological value should to be explored implemented as should the introduction of rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes. Ultimately the location of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.</p> <p>Green Infrastructure</p> <p>6.21a The development framework AL1 proposes green infrastructure that comprises a series of enhanced and new edges/belts of woodland/hedgerow planting and areas of green space. New substantial landscape edges/buffers, with tree planting are shown as a requirement along the northern, eastern and western perimeter to mitigate visual impact of any new buildings in the framework's northern area of development</p> <p>Species of trees and hedgerows</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>to be indigenous, and maintenance arrangements will be subject to legal agreement.</p> <p>6.22a A green link helps separate development in the northern and southern halves of the site, cutting east west across it. This link could comprise an active travel route and a SUDs basin situated within one of the areas of green space. An existing belt of juvenile woodland could be removed to ensure the link is overlooked by new buildings, enhancing its safety and accessibility. To preserve biodiversity and maintain visual and sound screening the coppice woodland dividing the two sites must be retained at its existing depth and density. Current application WNS/2021/2168/MAO proposes removing half the existing woodland on the East West link which is not acceptable</p> <p>6.23 (delete, the football pitches are not applicable to the 2021/2168 application.)</p> <p>6.24a The southern end of the site accommodates the key area of green space within the framework, potentially incorporating a SUDs basin. It is important given the topography that the location of the SUDs is specified given the potential flood risk to the A5, A43 and the Tove Valley Business park. Building Height, Scale and Massing (note – the application WNS/2021/2168/MAO is for 13m ridge height which is unacceptable)</p> <p>6.25a Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 16m in height 10m is the maximum to ridge height and being effectively screened from sensitive views by either existing or proposed tree planting. Large buildings over 5,000</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>sqm and 10m ridge height are unacceptable for this site. 10m ridge height should be defined as the maximum acceptable height and buildings with 10m heights should be set back from the site edges to minimise visual sensitivity from sensitive receptors.</p> <p>Any buildings which have a greater impact ie are visible above tree cover / from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering deliver the highest design quality and a thorough programme of landscape measures and the maintenance programme secured through legal agreement</p> <p>Placemaking / Urban Form</p> <p>6.26a The development framework AL1 suggests a series of key frontage opportunities across areas of new development, including along both the central green link / SUDs parkland, the A43, mirroring frontage on the southern side of the road, and the A5 adjacent to an access to the northern area of development. These frontages would must require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building façade can be created.</p> <p>Any larger buildings should be located away from the edges of any site to minimise visual impact.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: see above</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Site AL2 Development Framework 6.41-6.49 Page 70 -72 Surrounding Land Use &amp; Scale</p> <p>6.27 A cluster of uses, referred to as Bell Plantation (Garden Centre) is situated to the east of AL2 on the opposite side of the A5. Land uses include garden centre, nursery, vet and play centre. Buildings are relatively small in scale, ranging from 4-10 4-6.5 metres to ridge height.</p> <p>6.28 Jardine Select, a car forecourt is located to the south of AL2 and the other side of the Towcester Road. The building associated with this use is below road level, rising to approximately 8 metres in height.</p> <p>6.29 Linden Barn Food Shop, Towcestrians Sports Club and a series of agricultural buildings sit to the west of AL2, along or just off Towcester Road. The food shop sits approximately 200 metres west of the site and comprises a series of 5-7 metre high buildings which is only open to the public two mornings a week.</p> <p>The sports club sits approximately 250 metres to the north west of the site and comprises a single 1,000m<sup>2</sup> building, approximately 6 metres high surrounded by sports facilities, including tennis courts and sports pitches.</p> <p>6.30 There are a number of office, retail, light industrial and distribution uses situated around to the south east of the Tove Roundabout, refer to section 3</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>for further details.</p> <p>6.32 The south eastern corner of the site is planted with semi-mature trees; this structured planting is likely to have been introduced as part of works associated with Tove Roundabout and provides an element of visual screening. These must be retained in the event of the A5 being widened.</p> <p>Flooding</p> <p>6.34 Along the western edge of the site flood zones 2 and 3 follows the watercourse. Zone 3 is contained within the watercourse itself with zone 2 spreading no further than 10 metres into the south western corner of the site.</p> <p>The south eastern section of this field feeds into the flood zone affecting Towcester. There must be no risk of AL2 exacerbating this risk.</p> <p>Access &amp; Movement</p> <p>6.36 There is a continuous, at grade frontage of approximately 120 metres onto the A5, along the eastern edge of the site. There is a continuous, at grade frontage of approximately 180 metres onto Towcester Road, along the southern edge of the site. The only access point is from the narrow Towcester/Greens Norton Road. There is no footpath at this point.</p> <p>6.37 A footpath runs along the eastern edge of the A5, providing a continuous footpath that links into the centre of Towcester. There is currently no safe crossing point to that footpath over the A5 or A43 and is separated from that footpath by the 5 arm Tove roundabout. There are no footpaths along Towcester Road nor any footpaths on the western side of the A5, therefore no pedestrian or cycle access.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Heritage</p> <p>6.39 AL2 is roughly 1km west of the boundary of the Registered Park and Garden/Conservation Area of Easton Neston House, with the A43, housing and employment development situated between it and the protected estate. AL2 sits on the alignment of a tree-lined avenue in front of the House, this once provided provides a visual link from the House to the church spire in Greens Norton which is an important view and forms an 'eyecatcher' (i.e. a distant feature deliberately incorporated as an intentional view within the design of a park). Although any relationship is largely severed by intervening development Future proposals for AL2 should consider protect views along this alignment when preparing the arrangement, height and massing of any built form.</p> <p>Page 72 – AL2 Framework Access &amp; Movement</p> <p>6.41 The development framework AL2 provides a key access point into the site off Towcester Road / Greens Norton Road, from the south. The access is to be sited at least 100 metres from Tove Roundabout. Independent assessment is required to establish safety and viability of this access point, road width and the approach to allow safe crossing of the Tove roundabout.</p> <p>6.42 Active travel provision to the site is currently provided along the existing footpath on the A5. In addition to ensuring safe, comfortable and direct connection to this path for pedestrians any development should also explore provide a new safe signal pedestrian connection to Tove Roundabout from</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>along Towcester Road. This crossing must not impede the traffic flow on the Tove Roundabout, particularly travelling west or cause back up of traffic across the roundabout itself and block the A5 north exit. This additional crossing must work with the existing signal-controlled pedestrian crossing on the eastern side of the A43 which is used to access the A5 north from Towcester.</p> <p>6.43 Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of an eco-lighting plan and consistent use of wayfinding/signage should be considered implemented which minimises light pollution.</p> <p>Drainage</p> <p>6.44 The development framework AL2 sets out an integrated and attractive sustainable drainage network with swales located along green and woodland edges directing and filtering surface water to a basin located on the site's periphery.</p> <p>Opportunities and the 10% requirement for biodiversity net gain for this network to offer ecological value should be explored implemented as should the introduce rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes.</p> <p>Green Infrastructure</p> <p>6.45 The development framework AL2 proposes introducing new tree planting to reinforce the northern, eastern and southern all edges of any new development and to separate the buildings within the site to prevent overly dense development. These will link up to the existing treelined watercourse along the western edge of the site and extensive belt of tree planting along Towcester Road.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The depth of these green areas, woodland and planting must be clearly defined in metres and included in any masterplans.</p> <p>6.46 In addition the development framework AL2 shows the inclusion of green space along the edges of any development with a larger green space at the south western corner, incorporating a SUDs basin. These will allow for any development to be setback from the enhanced planted boundary treatments.</p> <p>The surrounding belts must be specified and defined in terms of width, height and planting. Maintenance of all planting to be secured by legal agreement.</p> <p>Height, Scale and Massing</p> <p>6.47 Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 10-12 metres in height, to a maximum height of 10m and being effectively screened from sensitive views by either existing or proposed tree planting. The site's size and proximity to development of a moderate scale adjacent to the Tove Roundabout is likely to will prohibit large buildings which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit. Buildings up to 10m AOD should be located in the centre of the site to reduce visual impact with appropriate screening.</p> <p>These will only be considered in exceptional circumstances if acceptable mitigation is provided such as delivering the highest design quality and thorough programme of landscape measures.</p> <p>Placemaking / Urban Form</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6.48 The development framework AL2 suggests a key frontage opportunity onto the Tove Roundabout and along Towcester Road. These frontages would require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building facade can be created. This must be compatible with the vision of an attractive 'northern gateway' to Towcester (see page 34 para 3.23). The enhanced planting section at the north east section of AL2 should be extended to the south east corner.</p> <p>6.49 There may be an opportunity to address stretches of the site's A5 &amp; Towcester Road frontage, adjacent to the roundabout with a bolder form and scale. Building orientation &amp; treatment and landscape proposals could help contribute a new gateway frontage into Towcester. Development on AL2 must respect Objective 9 of the Local Plan regarding high quality design that is respectful to heritage assets and their settings. It should contribute to a new gateway frontage into Towcester by retaining and enhancing dense screening to eliminate clutter on the Tove roundabout.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: see above Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No</p> <p>Please provide comments to support your answer:  Current planning application (S/2020/2337/MA0)  The developers for the current planning application (S/2020/2337/MA0) for this site (Clowes) intend to buy a much larger piece of land if its planning application is successful and originally submitted a blue line application for that larger site. It included that land on Prime Location advertising implying that it would become available.</p> <p>Government guidelines (NPPF) state that sustainability is at the heart of all planning decisions, not only for an initial application for development on the allocation site but future applications. Therefore, should a business prove successful, there would need to be an assessment of whether the expansion of the business on that site will still meet the criterion of sustainable development. Sustainability covers traffic and visual impact and given the ownership implications for Shacks Barn AL4; this wider assessment should be required.</p> <p>SUDs need to be provided within the existing 10 hectare allocated site per LP2, the developer's proposal and application S/2020/2337/MAO to site the SUDs outside of the 10h, thereby enlarging the allocated area by 28%, would lead to over development of the site. Given the sensitive nature of its location this should not be permitted.</p> <p>The SPD as currently proposed would facilitate the largest of the units in the current application, (6968m<sup>2</sup> x 15m) which are intended as warehousing with</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>16 bays for HGVs. It is this aspect of the proposed development on AL4 that must not be allowed to proceed through wording in the SPD. Application S/2020/2337/MAO locates these largest units in the area of maximum sensitivity as identified in the SPD.</p> <p>As has already been made clear the definition of medium sized units as up to 8000m<sup>2</sup> is unacceptable as it bears no relationship to the precedent set in the surrounding area. Specifically, the developments at Silverstone Circuit (the motor sport technology industry there being one of the justifications for AL4) which are a maximum of 5,000m<sup>2</sup>.</p> <p>Given its prominence in the landscape, being high on the Whittlewood/Yardley Ridge and visible from the North, West and South for many miles around the maximum permitted height at AL4 should be no higher than the existing buildings on the site. The land for AL4 rises above the existing units at Shacks Barn and 10m on this site is too high. 15m is unacceptable and facilitates warehousing which has the additional problem of lack of access on the South side of the A43.</p> <p>AL4 Technology corridor 3.13.</p> <p>Current existing units at Shacks Barn (referred to as Silverstone Business Park) are 250m<sup>2</sup> to 1200m<sup>2</sup>. Silverstone Fields on the opposite side of the A43 on a visually less prominent site has units up to 2,500m<sup>2</sup>. There should be no units larger than 2,500m<sup>2</sup> at AL4 given the precedent for this location and the access difficulties for HGVs.</p> <p>3.14.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Units at Silverstone Park (adjacent to the Circuit) are between 250m<sup>2</sup> and 5000m<sup>2</sup>. Reference is made to the scale and form of these buildings being heavily informed and in scale to buildings within the circuit. A similar link must be made to assess the suitable scale and form for AL4 in relation to the existing development at Shacks Barn.</p> <p>Note: the Silverstone Circuit development is not in a visually impactful site and has good access to the A43 with very limited direct impact on residential areas -unlike AL4 that will require access via Silverstone village and encourage rat-running through Whittlebury and along Cowpastures Lane.</p> <p>3.15 notes that there is a corridor of technology related employment emerging on this stretch of the A43 (between Shacks Barn, Silverstone Fields and Silverstone Circuit). It fails to note that there is no easy dual carriageway access between Silverstone Circuit and AL4. There is no justification for units of a scale that will facilitate warehousing relating to technology employment at AL4. What purpose in relation to Silverstone Circuit will they serve? What route will they use as access between the two sites? If such warehousing is needed, why is it not located at Silverstone Circuit closer to point of production and less impactful both visually and on local roads?</p> <p>Visual Summary</p> <p>The authors noted that not all the PRow were covered in their research. Located as it is on the Yardley/Whittlewood Ridge, AL4 can be seen for several miles around and from Abthorpe, Gayton, Silverstone and Greens Norton. There are many unreferenced receptors along Whittlebury Road and from</p>		



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		<p>footpaths between Whittlebury and Silverstone. Much more work required on visual receptors as the SPD is currently misleading about the impact.</p> <p>AL4 Site assessment 6.55 notes the visual sensitivity from the South and West but fails to note the sensitivity from the North (referenced above).</p> <p>AL4 Development framework The plan shows the development falling entirely within the allocated 10ha including the SUDS. If this is applied to the site it is to be welcomed. The current planning application has the SUDS on separate land outside the allocated area which is encouraging over development. Reference should be made to this requirement within paragraph 6.61</p> <p>Access &amp; Movement 6.60 There is insufficient reference to the extreme difficulty of access to this site. In addition to the lack of direct access to the south side of the A43, there is no current bus service, nor are there footpaths or safe cycling routes.</p> <p>The acknowledged problems of additional traffic using the A413 past two schools in Silverstone and one in Whittlebury is not addressed. Nor is the cumulative traffic impact of all the A1- 5 developments that will increase traffic loads on narrow roads through Whittlebury towards Silverstone and Buckingham and on Cowpastures Lane. The A413 is not suited to HGVs, nor are local rural roads: they need direct access to the A43/M1/M40.</p> <p>Green Infrastructure 6.62 Screening on all sides needs to be provided within the site boundaries due to the location on the ridge lending high visibility - the sight lines</p>		

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		<p>indicated do not extend far enough as, because of its position on the ridge, the location is visible from footpaths further away. Figures 49 – 60 (pages 52 to 55) The enhanced planting would need to be specified, time-scaled and enforced in relation to permissions being given to each section of the development. The most recent amendment to the current application confirms that it would take 15 years for mature growth to provide screening. This is clearly far too long.</p> <p>Heights, Scale and Massing</p> <p>6.65. Heights of 10-15 metres are unacceptable on this highly visible site. Heights should be in line with the current maximum at that location at Shacks Barn. Final sentence should read This may see development rise to a maximum that does not exceed 7.5 metres in height.</p> <p>6.66 This paragraph regarding 'Large Units' should be removed as it introduces new policy.</p> <p>Additionally</p> <p>Light and noise pollution in an area currently not lit at night and with near neighbours is not covered.</p> <p>The impact of the site on the rural business at Lordsfield Farm is not covered.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: see above</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No</p> <p>Please provide comments to support your answer:  Site AL5 Development Framework  6.85 – 6.93 Whilst Save Towcester Now is not responding on AL5 the cumulative traffic impact of all the developments AL1-5 is of grave concern. There is no coherent plan for the traffic generated by these sites to travel on the single carriageway north/south, nor for alleviating the already congested A43 round Towcester town. Instead, further congestion will follow when more roundabouts are added to the A43 driving more road users to seek dangerous alternatives. When the M1 is blocked, as happens regularly, and during rush hour when there are lengthy tailbacks along the A5, traffic seeks alternative routes through rural villages totally unsuited to the loads they are expected to take.</p> <p>Page 84  Exemplar development  Will planning applications be rejected if they fail to meet the 'exemplar' standards? This should be specified/explained.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:  see above</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?  Are there any other comments you wish to make which you haven't already made?:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>General Pg 6 para 1.10 Pg 8 para 1.21</p> <p>The publication of an SPD to add supplementary guidance for the 4 sites is welcomed, although there are some reservations with part of the content.</p> <p>The format is helpful, but there are some inaccuracies in places. Details of which are listed below.</p> <p>The selection of sites AL1-4 was predicated on those sites providing employment to “match the skills of the local people. Thus balancing the ratio of in and out commuting” – see page 20 para 2.21</p> <p>2.22 also states that the allocated sites are intended to:</p> <ol style="list-style-type: none"> <li>1. Meet local demand and strengthen the rural economy;</li> <li>2. Provide the ability to strengthen local supply chains;</li> <li>3. Local flexibility and choice of locations;</li> <li>4. Meet the demand for small and medium sized units; and</li> <li>5. contribute to reducing the level of out-commuting</li> </ol> <p>Given the socio-economic context detailed on page 21 paras 2.29 to 2.35 the irrefutable evidence is for professional and managerial employment to be provided locally in order comply with the 5 criteria above and bring about modal shift. The lower skilled employment offered by B8 warehousing on AL1/2/4 is not compatible with the resident workforce and expressly fails the intention of the Local Plan (2) given in-commuting will increase to fulfil those vacancies.</p> <p>There should be more emphasis on the Design Principles, both overarching and detailed for the four sites. These are not worded sufficiently clearly to effectively supplement the policy.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>This para should end with: - The outcome of the planning application on AL3 is not relevant to consideration of proposals on the other sites.</p> <p>Reads: 1.21. It is important to give appropriate consideration to the cumulative impacts arising from the other committed development ie development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years. REF: Paragraph: 014 Reference ID: 42-014-20140306 Travel Plans, Transport Assessments and Statements. At the decision-taking stage this may will require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of transport network as well as other relevant local sites benefitting from as yet unimplemented planning approval.</p> <p>And add</p> <p>For each development application, traffic impact should be assessed on a consistent basis across sites, and cumulatively factoring all built and committed sites that have an impact on the same stretches of road. This in the context of prior pinch point funding on Tove/Abthorpe roundabouts and predicated on creating a road network able to cope with 3000 new houses at SUE.</p> <p>Scale of buildings Paragraph 3.1, 3.3 on page 24, 26 page 38 Contextual Considerations Page 24 Page 26 para 3.7 Page 38</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The SPD as currently written introduces new policies, with the possibility of providing large scale building. This is not the intent of the Local Plan Policies and therefore should not be included in the SPD. Regulation 8 (3) of the Town and Country Planning Regulations 2012 states that SPDs must not conflict with the adopted development plan, and National Planning Policy Guidance (NPPG) Paragraph: 008 Reference ID: 61-008-20190315 clarifies that as SPD's do not form part of the development plan; they cannot introduce new planning policies into the development plan.</p> <p>Para 3.1 reads 'The existing scale, form and character of development along the M1 and A43 relating to AL1-AL4. The contextual considerations for AL1-4 are identified on page 26 as 2-7.</p> <p>Reference to the M1 in this paragraph should be removed as relevant context for AL1/2/4. The contextual considerations for AL1-4 are identified on page 26 as sites 2-7. Site 1 is situated on a motorway node, is strategic development and does not therefore represent a relevant reference point for AL1/2/4.</p> <p>All references to the Strategic Scale sites used as context within the SPD should make it absolutely clear that the sites subject of the SPD are not for large scale buildings. All wording should be 'Large Scale buildings will not be accepted on these sites' (the current definition being above 5,000 sqm.)</p> <p>In order to prevent future amalgamation of buildings to circumvent the intent of the SPD there must be a cap on the m2 for large buildings (e.g. 5,000m2 x 2). This should clearly state that despite a definition for large buildings being included, they will not be permitted on any of these sites.</p>		

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		<p>A43 Corridor – Scale, Form and Character Add to para 3.7 This section considers the character of the A43 from the M1 down to Silverstone Circuit. It demonstrates the small and medium scale, form and character of existing and operational employment development. This helps to define an appropriate scale range for buildings/units within the four sites. Swan Valley and the J12A developments are defined as 'Strategic' development under the WNJCS, whereas the AL1-5 sites were specifically identified as 'non-strategic' for the Local Plan (2). Swan Valley is not contextual to the rural character of the land to the north of the A43 and therefore not applicable to AL1 and AL2. The contextual considerations for scale, form and character for AL1 and AL2 are identified below as sites 2-7 and specifically site 4 at The Tove Roundabout. The contextual considerations for scale, form and character for AL4 are identified below as sites 2-7 and specifically site 6 at Silverstone Business Park (Shacks Barn) which is the adjoining site to AL4. Page 38 needs paragraph numbers Second bullet point The scale of buildings along the A43 Technology corridor indicates a maximum of 5,000 sqm including Silverstone Circuit buildings. Therefore, 'medium buildings' maximum is 5000sqm Third bullet point Large reflects the scale of buildings/units found in Swan Valley, a distribution park along the M1, setting a minimal footprint of 8,000 sqm at that location.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>A cap on 'Large' is needed.  Final paragraph reads  The presumption will be for the accommodation, across the employment sites of a mix of small medium and in exceptional circumstances, large sized units, as defined above.  It should read  The presumption will be for the accommodation, across the employment sites AL1-4 of a mix of small and medium units up to 5,000 sqm and in exceptional circumstances, large sized units, as defined above.  There would be no 'exceptional circumstances' where large scale buildings are agreed for AL1-4 as this would contradict the relevant Local Plan policies.  (Page 122 13.1.5 of LP repeated page 123 para 13.2.2.)</p>		
SPD204	Paul Parsons EMAIL RESPONSE	<p>Comment type:  Objection  Comments:  Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3 (which already has planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no southbound</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>access into the A43, meaning all vehicles travelling south will pass directly through Silverstone village or Whittlebury.</p> <p>AL3 (Tiffield Lane) which already has planning permission, should be subject to the same SPD conditions on all future developments within that site ie on changes and extensions to the existing planning permission on that site. The size of the buildings that have already been allowed on this site must not be used as a precedent for the other sites.</p> <p>The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit - that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p> <p>Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn. and should not be used as a precedent. It is Strategic Development, whereas the LP2 allocations are ALL for Non-Strategic Development.</p> <p>The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be defined and specific - it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location.</p> <p>The existing development at Bell Plantation would be a good example of this.</p> <p>No building to be taller than any existing building on a nearby site ie for AL1 and AL2 this is site 4 (on</p>	<p>an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local</p>	<p>proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>page 28 of the SPD) and for AL4 this is site 6/Silverstone Business Park/Shacks Barn (on page 30 of the SPD). The control of the maximum ridge height of buildings on AL1 and AL2 should be 10 metres, whereas the maximum ridge height for the buildings at AL4 should be 7 metres. This is because of its rural location and position on the Whittlewood Ridge which lends to far reaching visibility of the site. That is the precedent for the local area and would fit with the intent of the Local Plan (2) for small and medium sized units.</p> <p>It should be clarified that smaller/medium buildings cannot be joined up at later dates to form larger units.</p> <p>On page 24, para 3.2 we advise that 'in part' is removed from the role of the employment sites. These sites were never intended only as 'in part' for small, medium developments but rather, the WHOLE of the LP2 is for small and medium development.</p> <p>Screening using trees must be large scale, not planted with the possibility of full screening only after 15 years. Further, maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable screening.</p> <p>The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. This is of particular importance for AL4, where the developer has already attempted to increase the development site area by 28% through placing the drainage ponds outside of the allocated land area.</p> <p>All these employment allocations were based upon fulfilling employment need to reduce out-commuting.</p>	<p>flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		There is no evidence base for unskilled or low skilled warehouse jobs in South Northants. Developers need to demonstrate how their development will meet local skills requirements. They need to set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on types of jobs.		
SPD205	Towcester Town Council	<p>Re: Consultation: South Northamptonshire Local Plan Part 2 Employment Allocations – Draft Supplementary Planning Document</p> <p>The above Supplementary Planning Document was discussed by Towcester Town Council's Resources &amp; Planning Committee at its meeting held on 25th July 2022. Its response is included below:-</p> <p>Transport Assessments &amp; Statements (Page 8)</p> <p>Paragraph 1.21 states 'it is important to give appropriate consideration to the cumulative impacts arising from other committed development (i.e. development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next three years).' Towcester Town Council consider that West Northamptonshire Council, as the planning authority, must take responsibility for setting the parameters for an independent location-based traffic assessment for current and predicted traffic conditions impacting the A43, A5, M1 and A508, the town centre and surrounding villages. To date, traffic and transport assessments have been desk-top analysis based on locations elsewhere and not considering the actual conditions locally. Initial responses to a consultation currently being carried out by Towcester Town Council; demonstrate that these issues are the primary concern for most residents.</p> <p>7</p> <p>Small, Medium and Large Unit Sizes (Page 38)</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester.</p>	<p>The SPD will include reference to the important viewpoint. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document</p>

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		<p>The Draft Supplementary Planning Document states that 'The presumption will be for the accommodation, across the employment sites of a mix of small, medium and in exceptional circumstances, large sized units'. However, in the adopted South Northamptonshire Local Plan Part 2, paragraph 13.2.2, referring to the three Towcester employment allocations; it states 'All three sites offer suitable locations for a range of new small and medium sized business units'. Paragraph 13.2.3 (AL1/Bell Plantation) states represents an appropriate employment location for the provision of additional small and medium sized commercial buildings' and paragraph 13.3.2 (AL4/Shacks Barn) states 'This allocation proposed to extend the business park with a range of new small and medium sized business units.</p> <p>Under the Town &amp; Country Planning Regulations (2012), Supplementary Planning Guidance cannot introduce new policy by declaring that large units are acceptable on these sites. Furthermore, this mix of different sized units must be more clearly defined in order to achieve the aim of diversity and resilience in the local economy. The mix should be based on the area utilised for each size category, rather than the number of units of each size. A prerequisite must also be placed on each developer to demonstrate that its proposals will deliver suitable semi-professional and professional employment opportunities for the benefit of local people.</p> <p>The definition of small, medium and large units is only given in terms of a building's footprint and does not consider the height as a relevant factor. Given that Swan Valley has been chosen as a reference for the size of building footprint considered 'medium' it would be reasonable to consider the height of the buildings within Swan Valley, adjacent to the M1 at the edge of Northampton, which fall into this category. At Swan Valley, units below 8,000m<sup>2</sup>, the highest is approximately 13m.</p>	<p>The main objectives for this include improve safety, reduces the impact of air and noise pollution. Provision of new footpaths and cycleways that link to existing networks; and c. Good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of pedestrian cycling and walking links between the site and Towcester town.</p>	<p>that will seek to encourage/steer applicants towards more ambitious design standards.'</p>

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		<p>Given the sensitivity of the landscape and visual impact of development, Towcester Town Council is of the view that a maximum height of 12m is far more appropriate for the employment sites designated in the SN Local Plan Part 2. Site AL1 Development (Page 68) Paragraphs 6.18 &amp; 6.19</p> <p>Towcester Town Council supports the consultation response submitted by South Northants Active Travel Routes (SNATRA) and would urge West Northamptonshire Council to prioritise the creation of a Local Cycling &amp; Walking Infrastructure Plan (LCWIP) to maximise opportunities for active travel and the supporting infrastructure as a key planning consideration for new environmentally sustainable developments.</p> <p>Paragraph 6.23 states 'The siting of Towcester Football Club's (TFC) pitches is not currently defined in policy, as such, these could be accommodated in an alternative location if justified. This statement should clarify that the alternative locations referred to are within the boundary of the AL1 employment allocation.</p> <p>Paragraph 6.25 states 'Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 16m in height, and being effectively screened from sensitive views by either existing or proposed tree planting. Large buildings, which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering the highest design quality and a thorough programme of landscape measures'. This wording is not strong enough. It should state that they be effectively screened from sensitive receptors. This also applies to Page 72, paragraph 6.42 (AL2), Page 76, paragraph 6.66 (AL4) and Page 80, paragraph 6.92 (AL5). Site AL2 Development (Page 70)</p>		

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		<p>Paragraph 6.39 states 'AL2 sits on the alignment of a tree-lined avenue in front of the House, this once provided a visual link from the House to the church at Greens Norton. Although any relationship is largely severed by intervening development...'</p> <p>You can see in the photograph included below that the spire is clearly visible on the horizon. Indeed, the configuration of the Persimmon Homes development 'Shires Estate' was designed to maintain this view.</p> <p>The wording of this paragraph should be changed to take this into account and paragraph 6.47, which deals with scale and massing, must include specific wording to ensure that the AL2 development does not impact on this historically important view.</p>		
SPD206	Sarah Lawson	<p>We wish to make the following observations about the future development of Towcester:</p> <p>Traffic - there needs to be a cumulative traffic assessment not individual ones for each development. Ironically, several people arrived late for the council-organised Drop-In in Towcester because the traffic was so slow and congested on the A43 and A5. And that was mid-Weds pm. If the Drop-In had been early evening, they would still be waiting for us now.</p> <p>The A43 and A5 are routinely gridlocked and lengthy standstills caused when traffic is diverted from the (frequently closed) Junctions 15 / 15A of the M1. Such blockages also result in quiet local villages being used as rat-runs. It was explained to us at the Drop In that, for procedural reasons, a cumulative traffic assessment was not done. If it isn't, then councillors need to use their own observations and common sense. Locals are very happy to take councillors for a research "drive" - although you won't be going anywhere - on the A43 and A5</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>during one of the many already gridlocked periods. And with the new houses along the single carriageway relief road, the massive increase in lorries from the new warehouses, plus, presumably buses bringing in the workers, it is only going to get much worse.</p> <p>Apart from the difficulty of moving around the area, there is also the question of pollution. Towcester residents on Watling st have already been told to keep their windows shut due to pollution. Villages, such as Greens Norton, need to be protected too as they are suffering from being used as rat runs. The question councillors need to answer is: how can you justify actions that will have such a devastating effect on the quality of life and health of your electorate?</p> <p>Building size - the local plan says that only small or medium sized units should be built. This should be enforced vigorously with footprint and height restrictions. Height should be no taller than 10m. It should also be made clear that small and medium units can not be joined in future to make bigger units. AL3 should be subject to same SPD conditions on future developments.</p> <p>Sustainability and screening - all sites should be screened by native trees- and a 10 year management scheme for maintenance and establishing the trees should be legally binding. Warehouses should have solar panels and rainwater capture to make them as sustainable as possible.</p> <p>In conclusion, having talked to councillors and planners we cannot see one benefit to Towcester from these warehouses, so everything possible needs to be done to reduce the damage to the environment and health and well being of local people and future generations.</p>	<p>the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change.</p>
SPD207	Fiona Mytton	We welcome the Supplementary Planning Document (SPD) as it will provide clarity for the local	The Local Plan Part 2 requires a transport assessment and travel plan	The SPD will be

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		<p>community and guidance for developers, and those assessing planning applications.</p> <p>We have the following comments on the document:  Transport Assessments and Statements  We are pleased the SPD recognises the importance of giving appropriate consideration to the cumulative impact of committed development on traffic in paragraph 1.21. However we feel this section of the report needs to be more robust and provide more detail as follows:</p> <p>a) the SPD should require all applications for development on the allocated sites to carry out a cumulative traffic assessment  b) the traffic assessments should look at the impact on traffic on the A5, A43, the Tove and Abthorpe roundabouts. It also needs to address the situation before and after the development of the Towcester Relief Road  c) the traffic assessments should consider not only all committed development on the allocated sites, but also the impact of the Towcester Vale housing development once complete and AL3 when operating. The assessments also need to consider the impact of M1 closures and holdups.</p> <p>Size of units  The local plan specified that the allocated sites would be suitable locations for a range of small and medium sized business units. However, the SPD has introduced the possibility of AL1, AL2 and AL4 having, in exceptional circumstances, large units which it defines as 8000 square metres. We are very concerned that this opens up the scope for large-scale units, which would</p>	<p>to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the</p>	<p>amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already</p>



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		<p>be contrary to the local plan and the development of the area to date. We request that all references to large units being considered for AL1, AL2 and AL4 are removed from the SPD and the maximum footprint on any site is up to 5000 m<sup>2</sup>, as this is the local precedent which should be honoured. We also request that the SPD makes it clear that only small and medium-sized units will be acceptable for AL1, AL2 and AL4</p> <p>The explanation of the nature of development along the M1 corridor, the A43 corridor, the rural setting north of the A43 and the Towcester gateways is very useful. However, equal weight is given to the development along the M1 corridor and that of the A43, which cannot be appropriate. We do not accept the statement in paragraph 3.1 that the development along the M1 is a contextual consideration for AL1, AL2 and AL4. The development around the M1 is the type of development commonly permitted along motorway corridors. This should not set a precedent for development of Towcester which is essentially a small rural historic town some distance from the motorway. We request that the SPD makes it clear that the current development along the M1 is not a contextual consideration for the development of AL1, AL 2 and AL 4.</p> <p>The SPD should make it clear that buildings cannot be joined up at a later date to form larger units.</p> <p>Height of Buildings</p>	<p>heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>Controlling building height is important in reducing the visual impact of each development. We request that no building should be taller than any existing building on a nearby site subject to a maximum height of 10 m as this is the area precedent, and in line with the intent of the Local Plan for small and medium-sized units.</p> <p>Role of employment sites</p> <p>We are puzzled by the use of the words 'in part' in paragraph 3.2. We believe that these words are unnecessary as the list is complete. If there are other roles, which are not listed, these should be included.</p> <p>AL3</p> <p>This development was approved before the SPD was drafted. The size of the buildings that have already been permitted on this site must not be used as a precedent for other sites, as that would make a mockery of the SPD. The SPD should apply to any revised or future planning applications for this site so that this site is developed against the same framework as AL1, AL2 and AL4</p> <p>Please ensure that the above comments are taken account of in your review of comments on the SPD.</p>		
SPD208	James Guthrie Quod - DHL	<p>Representations to the South Northamptonshire Local Plan Part 2 - Employment Allocations SPD Consultation</p> <p>DHL Real Estate Solutions ('DHL') is the owner of the northern and eastern portion of the Bell Plantation, which forms part of land allocated under AL1. Please find enclosed representations to the South Northamptonshire Local Plan Part 2 - Employment Allocations SPD Consultation on behalf of DHL, providing in</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The live planning application is being assessed against the material submitted alongside the planning</p>	<p>Additional wording has been added regarding AL3 to set out that alongside</p>

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		<p>principle support to this consultation, subject to the comments and concerns in this representation being appropriately addressed. The additional guidance is largely welcomed, alongside the consistency in approach to development and elevated design standards it will bring.</p> <p>Emerging West Northamptonshire Strategic Plan Ahead of directly addressing the SPD consultation, it is important to note the emerging local policy position, with the West Northamptonshire Strategic Plan Spatial Options Consultation held in late 2021. Supporting this consultation was the Housing and Economic Needs Assessment (September 2021), with the Spatial Options Consultation document stating (p.8):</p> <p>“For West Northamptonshire as a whole the HENA identifies an unmet need for industrial land of around 48 hectares, equivalent to about 67 football pitches.</p> <p>However, the HENA recognises that there is uncertainty about strategic warehousing demand which may require additional provision above the 48ha shortfall identified in the study.</p> <p>Having regard to the length of the plan period i.e. up to 2050, the HENA recommends that the requirements for strategic warehousing are revisited through a separate study or plan update which incorporates wider sub-regional issues of logistics demand and supply.”</p> <p>This sets out an expectation that significantly more land will be required in addition to the existing Employment Allocations to meet the anticipated need of West Northamptonshire, which is expected to be well beyond the 48ha identified in the HENA.</p> <p>The HENA recognises that existing stock is ageing and in need of replacement and it is likely the Strategic West Northamptonshire Plan will need to plan for and allocate a significant amount of new</p> <p>Our ref:</p>	<p>application. Detailed work in support of the planning application will be considered against the planning application.</p> <p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations.</p> <p>The emerging HENA will form part of the evidence for the emerging West Northamptonshire Strategic Plan.</p> <p>This SPD will be a material planning consideration in the determination of future planning applications.</p> <p>The assessment undertaken as part of this SPD is not intended to be exhaustive, as such further contextual and site assessment and design work will need to be undertaken at planning application stage.</p> <p>The AL3 site now benefits from planning permission. In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations. This SPD will be a material planning consideration in the determination of future planning applications.</p>	<p>revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p> <p>Wording of the SPD amended to more accurately reflect the wording of LTP2 “provision of an</p>

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		<p>Q200664  Email:  Date:  17 August 2022  Planning Policy Team  The Forum  Moat Lane  Towcester  NN12 6AD  By Email (localplanconsultation.snc@westnorthants.gov.uk)  2  employment floorspace. This SPD provides an important opportunity to act as an exemplar Development Brief for all future employment led development in West Northamptonshire, and it is strongly encouraged the SPD is cognisant of the emerging position.  Response to the SPD Consultation  This representation addresses the Draft Employment Site Allocations Development Brief SPD (June 2022) (the 'Draft SPD') in chronological order with comments addressed under a series of numbered subheadings.  1 AL3: Land at Tiffield Lane, Towcester  The lack of inclusion of AL3 in the draft SPD is a fundamental flaw.  It is unclear as to why AL3 has not been included in this document, and its lack of inclusion risks the soundness of the entire Draft SPD. It is clear from a number of paragraphs and figures that AL3 has previously been included in drafts of this SPD, and it is important AL3 is reintroduced to the next draft as its exclusion has left obvious flaws in approach. Not including AL3 ignores consented parameters for which all employment allocations should be assessed against to adopt a consistent approach.</p>	<p>The assessment undertaken as part of this SPD is not intended to be exhaustive, as such further contextual and site assessment and design work will need to be undertaken at planning application stage.  In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations.  This SPD will be a material planning consideration in the determination of future planning applications in line with clear Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315). Additional reference has not been made to ensure the longevity of the SPD against PPG referencing amendments.  The assessment undertaken as part of this SPD is not intended to be exhaustive, as such further contextual and site assessment and design work will need to be undertaken at planning application stage.  The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p>	<p>unfettered road access point to the edge of the football club site”.</p>

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		<p>It is, of course, acknowledged that the planning application (S/2020/1644/EIA) by IM Properties PLC was permitted by West Northamptonshire Council ('WNC') on 23 June 2022. This is however no reason as to why AL3 would warrant any specific exclusion from this SPD. AL3 benefits from a hybrid (unimplemented) consent only. Future reserved matters applications pursuant to the hybrid should be guided by the parameters set in that permission but also the SPD. This should be the same way for all the other employment sites. It is also possible that the current planning permission is not implemented either entirely, or in part.</p> <p>It is important that all the allocated employment sites are considered, as far as possible, as a whole; and that opportunities for complementary development are considered with efficiencies between the sites maximised. This approach will facilitate sustainable development in accordance with development plan policies.</p> <p>It is strongly recommended another round of consultation on the draft SPD is undertaken to allow for further comments following AL3's inclusion, as it is likely to influence various sections of the document. The next draft of the SPD should include the same level of guidance for AL3 as the other employment sites, and that all references are updated as such to reflect in the SPD guidance for all five employment sites. It is proposed that the AL3 guidance includes clear direction for AL3 to provide sustainable connections to AL1 to maximise the opportunity for public transport and foot/cycleway connections between the employment sites.</p> <p>3</p> <p>2 Policy AL1: Bell Plantation (p.10)</p> <p>There are errors in the summarising of the policy wording in the first paragraph (e.g. the wording of the football club access). It</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. However, there may be the opportunity for development proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area. Large proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by the benefits. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to</p>	

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		<p>is requested the wording is repeated in full to avoid any misunderstanding of the policy wording.</p> <p>While the live planning applications are noted, there is no statement or acknowledgement here, or elsewhere in the document as to how these have influenced the landscape and visual impact work on the draft SPD, and to what extent these conclusions are pre-determined.</p> <p>3 Local Plan Part 2 (LPP2) (p.20) / Contextual Considerations (p.25)</p> <p>The SPD is overly selective in the paragraphs it references to fit a narrative that does not accord with adopted development plan policy. There are important aspects of policy and supporting text that are not referenced, for example the supporting text to Section 13 Employment Allocations in the Part 2 Local Plan is clear that "Plans should meet anticipated employment needs over the plan period. Policies should, however, be flexible enough to accommodate needs not anticipated in the Plan and to allow a rapid response to changes in economic circumstances."</p> <p>This flexibility is a pillar of planning, and it is successfully integrated into the relevant policies of the LPP2, e.g. Policy AL1 which clearly states:</p> <p>"3. Land Uses: Employment a. An independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use."</p> <p>It is recommended the flexibility provided by the adopted policies (and supporting text) of the LPP2 is made clear in the SPD, and less reliance is placed on supporting text.</p> <p>This demonstrates the usefulness of the context supporting text can give, however material weight can only be placed on the Policy AL1 wording. Much of the text referenced in the SPD is</p>	<p>be undertaken to best shape a proposal for each site.</p> <p>The appropriateness for any cut and fill will be determined as part of the planning application process on an individual site by site basis.</p>	

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		<p>supporting text and while helpful in part, it is not planning policy and is misleading in the way it is being presented. It is strongly recommended the weight that can be attached to extracts chosen in the SPD be made clear.</p> <p>An example of the issue is with paragraph 13.1.5 of the LPP2. This is repeated numerous times in the SPD to emphasise local demand and local supply chains, but the SPD does not reference wider demand sought in other paragraphs of the LPP2. It must also be acknowledged in the next draft of the SPD that nowhere in any of the policies in the LPP1 or LPP2 Plan is there any reference to small and medium units.</p> <p>4</p> <p>The weight that can be given to the SPD in any planning determination will be based on its consistency with the policies of the adopted development plan. Planning practice guidance is clear (Paragraph: 008 Reference ID: 61-008-20190315) that the role of an SPD is to:</p> <p>“Build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development”</p> <p>Limited weight is therefore attributable to sections of the SPD that are drafted based on objectives or supporting text of the adopted development plan. It is strongly recommended the approach the SPD, including the Contextual Considerations (p.25 onwards) section is revisited, with relevant LPP2 policies referenced (e.g. EMP1, EMP3, etc.) in line with national guidance.</p> <p>4 Rural Setting North of A43 (p.32)</p> <p>The agricultural land to the north of the A43 is not acknowledged as being allocated for, and consented for, the</p>		

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		<p>delivery of the AL3 scheme. The last sentence of paragraph 3.16 regarding the visibility of Towcester and the wider countryside is misleading about the extent of visibility, but demonstrates views are already characterised by roads and development (while AL3 is omitted, which forms part of the known future context).</p> <p>The geographic extent of the observation at paragraph 3.17 is unclear, but while the roads between Towcester and Greens Norton are single lane in each direction, the description of them as single tracks is misleading and should be amended.</p> <p>A strong objection is raised to the wording of paragraph 3.19 which seeks to go well-beyond the requirements of Policy AL1, and other LPP2 policies. Many of the reference points selected are inappropriate and distant from the AL allocations. The justification that the scale and form of new employment development should be based on existing agricultural buildings and Towcestrians Sports Club is not justified, due to being both inappropriate for the operation requirements of modern employment land uses, negating innovative design and the policy requirements of LP Objective 9, as well as ignoring the scale and form of the AL3 development. It is strongly recommended paragraph 3.19 be removed.</p> <p>5 Exceptional Circumstances (p.34 / p.38)</p> <p>We object in the strongest possible terms to references of "large sized units" being in "exceptional circumstances". This strongly conflicts with the LPP2 policy wording which states: "An independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably</p> <p>5 subservient and complementary in both scale and nature to an existing or proposed B class use."</p>		



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		<p>Nowhere in the LPP2 is there a reference to exceptional circumstances being required for larger sized units. All references should be removed.</p> <p>As per Section 3 Part 2 Local Plan above, the LPP2 purposely has flexibility to respond to market requirements, and for the SPD to be sound, it must acknowledge this flexibility – seeking to restrict the provision of large units in any way is beyond the scope of what the SPD can do and would clearly conflict with both national and local policy.</p> <p>6 Towcester Northern Gateways (p.34)  Figure 1: Development Plan Extract  Inset Map 76 of the LPP2 which sets the settlement confines for Towcester to the south of the A44 – extract below. It is therefore recommended paragraph 3.23 is made clear that the key arrival point / gateway into Towcester is south of the Tove roundabout.</p> <p>Paragraph 3.23 must also be amended to remove reference to AL1 &amp; AL2 forming part of this gateway. AL1, AL2 &amp; AL3 form part of the “approach into Towcester [...] along the A5 and A43” referenced in paragraph 3.22, and as such the design approach should focus on creating “a more active and distinctive approach”.</p> <p>It is further considered that if the employment sites are to form part of a “distinctive approach”, this will require larger buildings and unashamed design, that demarcate such a support – which would conflict with other parts of the SPD which seek to overly mitigate the visual impact of the buildings. It is recommended that the approach to this section is for consistency.</p> <p>6  7 Unit Sizes (p.38-39)  The justification for small and medium scale led development at the SPD sites has been justified on the basis of some existing transport routes, and that there is less large-scale development</p>		

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		<p>in comparison to the M1. This is not an effective evidence base as it ignores the scale and extent of Towcester, it's demonstrated lack of supply and requirement to meet demonstrated need (both in the adopted and emerging plans) and future consented development of the area.</p> <p>It does not address the 'reality' on the ground via differing sites being able to accommodate development and as per earlier, it ignores the approved AL3 scheme, which will fundamentally change to the character to the north of the A43.</p> <p>There is no clear relationship between the footprint of a proposed building and its height in the examples provided, and it is unclear if the supporting studies for the SPD have investigated heights.</p> <p>Unit Sizes Approach</p> <p>While there is not a strong objection to the approach to the size categories in the SPD, the approach is not robust and requires further assessment. It must be revisited with additional regional and national evidence, to ensure the SPD is sound. The LLP2 and any supporting SPDs must be sound against national planning policy and using very localised studies is not appropriate.</p> <p>In particular, the SPD bases its large size categories on a single local cluster of industrial units, while other unit sizes are based on a very local sample. This approach, for example, does not include Northampton Gateway ('NG'), located in South Northamptonshire and only 8km from the majority of the Employment Allocations. NG is consented for 5 million sq ft, with plots of between 530,000 sq ft and 1,919,000 sq ft. For context, the smallest plot at NG is larger than the largest unit that can be delivered at AL3).</p> <p>Furthermore, it is recommended the anticipated unit sizes of the consented AL3 are assessed and integrated into this</p>		

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		<p>section of the SPD to ensure a robust approach to the emerging position in Towcester.</p> <p>As a reminder, the SPD provides the following unit size hierarchy:</p> <ul style="list-style-type: none"> <li>▪ Small units: 250 sqm to 2500 sqm (about 2700 sqft to 27,000 sqft)</li> <li>▪ Medium units: 2500 sqm to 8000 sqm (about 27,000 sqft to 86,000 sqft)</li> <li>▪ Large scale units: 8,000 sqm or greater (86,000 sqft or greater)</li> </ul> <p>In the Towcester Market Analysis Report that supported the DHL AL1 planning application the following hierarchy was used to assess the market:</p> <ul style="list-style-type: none"> <li>▪ Small units: 930 sqm and less (about 10,0000 sqft)</li> </ul> <p>7</p> <ul style="list-style-type: none"> <li>▪ Medium units: 930 sqm to 9,300 sqm (10,000 sqft to 100,000 sqft)</li> <li>▪ Large scale units: 9,300 sqm or greater (100,000 sqft pr greater)</li> </ul> <p>While the distinction between small and mid-sized units is somewhat fluid, the Savills Big Shed Briefing (the industry standard report on large industrial premises) uses 9,300 sqm (100,000 sqft) as the threshold for defining large units. This is the threshold that industrial agents use, reflects best national recognised practice, and it is recommended this is utilised in the SPD.</p> <p>The illustrations provided on p.39 are misleading, unclear, unhelpful, and impossible to ascertain their accuracy – while their intention is unknown. It is strongly recommended these are removed.</p> <p>8 Visual Summary AL1 (p.42 onwards)</p> <p>The omission of AL3 is a fundamental flaw, which means the SPD does not have an effective evidence base for its</p>		

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		<p>assessment. The omission of AL3 (and other cumulative developments) at Towcester negate the argument for medium and small-scale development based on the present context, when they should address the known and emerging future change to come to ensure a coordinated and unified design response.</p> <p>The viewpoints chosen are considered robust; however, the analysis significantly over-emphasises the sensitivity of the landscape, and is inconsistent – for example, there is one view to the north of the Site at Caldecote, yet it is suggested an area of land to the north of Caldecote is also sensitive to the scheme.</p> <p>It is strongly recommended the approach to this section is revisited, starting with including the AL3 proposals, then assessing how each scheme may link with and compliment AL3, supported by simple block model images of various building heights to justify the rationale for a new skyline.</p> <p>If the SPD does not identify the sensitivity of the visual receptors at paragraph 4.2, then it is unclear how the SPD can claim to identify a series of sensitivity receptors as part of the visual analysis.</p> <p>The suggestion at paragraph 4.3 is that the countryside is highly accessible to the north of the A43. There is one route between the A43 and Caldecote, which crosses the AL1 allocation and is relevant to the visibility of AL1. All other routes would not have views of AL1 due to the undulating landform and intervening vegetation. The allocation of AL1 inherently accepts visual change from this route across AL1.</p> <p>The potential for visual change from the 1 ProW (referenced at paragraph 4.4) which extends between the A43 and Caldecote is accepted by the allocation of the AL1 Site. The approach to Towcester is already characterised by development, as set out</p>		

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		<p>in the SPD (paragraph 3.16) and the SPD ignores the AL3 allocation within these views.</p> <p>8</p> <p>Figure 30 highlighting key receptors around AL1 and AL2 is unclear, with the base mapping not visible. The extent of the yellow line is not justified as it ignores the AL3 site in relation to View 2. AL1 and AL2 would not be visible from Views 1 and 11. If View 6 is the furthest northwards views, clarity would be welcomed as to why the yellow line extend to the north of Caldecote. The remaining views demonstrate the localised visibility of AL1, from the local road networks and from elevated locations in the landscape, not the lower lying land, from which views would also be obtained of AL3, which is ignored by the SPD.</p> <p>The dashed red lines on p.46-49 are inconsistent – for examples, Figure 42 uses an arrow. It is strongly recommended it be made clear the dashed red lines indicate the theoretical extent of the allocated sites within the view but not that the allocated sites are necessarily visible within these views. It must be clearly noted there is no analysis from these locations to link the potential visibility of various building heights to be able to provide design advice.</p> <p>9 Overarching Design Principles (p.62)</p> <p>DHL is supportive of the overarching design principles set out in Section 5 of the SPD, and welcomes the reference design needing to be dependent “on the needs of the user and market conditions”. It is considered important that all of the proposed overarching design principles are retained in future drafts of the SPD to ensure the highest quality design comes forward across all the AL employment sites.</p> <p>It would be beneficial for the design principles to also make reference to the design approach being done in the most sustainable way, including aspirations for sites to achieve a cut</p>		

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		<p>and fill balance where possible, which would avoid the movement of materials to / from sites as far as possible. If materials are to be moved to / from sites, this should be done in the most sustainable way possible (e.g. using local sites). The relevance of the pictures provided on p.63 is unclear, and it is recommended these are removed.</p> <p>10 Site AL1 Assessment (p.66)</p> <p>No objection is raised to the majority of the assessment, however paragraph 6.10 makes reference to “a need for greater sensitivity” – which is beyond the factual nature of this section and should be amended to just include references to any potential sensitive receptors, rather than making recommendations on approach, which should be in the following section.</p> <p>11 Site AL1 Development (p.68)</p> <p>The development of AL1, and all other sites, should be done in accordance with the policies set out in the LPP2, alongside detailed technical assessments and studies. It is not immediately clear regarding the level of work undertaken to support the development framework proposed, or whether reliance has been placed on submitted documentation by live planning applications, with untested conclusions drawn by the author of the SPD.</p> <p>9</p> <p>The Development Framework is overly prescriptive, and it is strongly recommended it is reviewed to deliver high-level principles only as to not restrict development. In its current form it conflicts with adopted development plan policy and seeks to restrict the amount of deliverable floorspace to a level below that set out by Policy AL1, and against national policies to make the most efficient use of land.</p> <p>The framework has clearly been strongly influenced by the live planning applications, but has also sought to introduce new</p>		

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		<p>aspects without any justification. Each of the paragraphs in this section are addressed in turn. Paragraph Draft SPD Text Comment Access &amp; Movement</p> <p>6.18 The development framework AL1 provides a number of key access points into the site off the A5. These include an access located to the immediate north of the Bell Plantation and an access half way along the northern field boundary. New link roads to lead off these access points to utilise all parts of the development areas, including an access to any sports pitches. It is inappropriate for the development framework to prescribe precise "key access point" locations from the A5 unless sufficient assessment and liaison has been undertaken with the relevant highway's authorities.</p> <p>6.19 The development framework AL1 includes new east west active travel routes that link the A5 footpath with PRow SB1. Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of a lighting plan and consistent use of wayfinding/signage should be considered. This is supported. Drainage</p> <p>6.20 The development framework AL1 sets out an integrated and attractive sustainable drainage network with swales located along woodland edges, the site's A43 frontage and a central green link, directing and filtering surface It is made clear that SUDs locations will need to be informed by a drainage strategy.</p> <p>10 Paragraph Draft SPD Text Comment water to a series of basins located on the site's periphery. Opportunities for this network to offer ecological value should</p>		

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		<p>be explored as should the introduction of rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes. Ultimately the location of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.</p> <p>No drainage strategy has been undertaken in support of the SPD.</p> <p>While an integrated and sustainable drainage network is supported, it is strongly recommended that specific SUDs locations are removed from the framework and informed by technical surveys and agreed with respective approving consultees. Green Infrastructure</p> <p>6.21</p> <p>The development framework AL1 proposes green infrastructure that comprises a series of enhanced and new edges/belts of woodland/hedgerow planting and areas of green space. New substantial landscape edges/buffers, with tree planting are shown as a requirement along the northern, eastern and western perimeter to mitigate visual impact of any new buildings in the framework's northern area of development. There is no policy justification for requiring pockets of green space in specific areas. Green space and green networks require a cohesive approach to landscape and ecology to maximise opportunities.</p> <p>The proposed green space is opposite a (currently non-operational) café, and serves no justifiable benefit in that location, with no evidence provided to support the proposal.</p> <p>The identification of such a large area of green space, above the football club land (see below) will impinge on the ability of AL1 to meet its policy requirement to deliver 35ha of mixed employment space – indeed, the Development Framework areas identified provide only 30ha (18ha+12ha) which would hinder the ability of AL1 to deliver on the aspirations of policy.</p>		



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		<p>11 Paragraph Draft SPD Text Comment Policy AL1 already sets an onerous requirement of 6ha of land to be provided for the football club, which the framework places entirely within the DHL ownership and seeks to render the football club inaccessible from other parts of AL1.</p> <p>6.22 A green link helps separate development in the northern and southern halves of the site, cutting east west across it. This links could comprise an active travel route and a SUDs basin situated within one of the areas of green space. An existing belt of juvenile woodland could be removed to ensure the link is overlooked by new buildings, enhancing its safety and accessibility. A green / active link from the A5 through AL1 and linking with the PRoW and AL3 is supported. It is recommended the Development Framework for AL3 includes a similar provision to maximise the opportunity.</p> <p>6.23 The southern half of the site is broken up by a series of narrower belts of landscape, these run north south separating new development from land earmarked for Towcester Football Club (TFC). The siting of TFC's pitches is not currently defined in policy, as such these could be accommodated in an alternative location if justified. As per the above, the purpose of the framework is not clear. It is not supported by any detailed studies, and questions its own ability to justify the locations provided. It is requested that justification is provided as to why the sports pitches are in this location, and not, for example, abutting the A43.</p> <p>6.24</p>		

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		<p>The southern end of the site accommodates the key area of green space within the framework, potentially incorporating a SUDs basin.</p> <p>As per the above, concerns are raised regarding the ability and appropriateness of the Framework setting specific locations for SUDs without detailed drainage strategies being commissioned. Building Height, Scale and Massing</p> <p>12 Paragraph Draft SPD Text Comment 6.25</p> <p>Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 16m in height, and being effectively screened from sensitive views by either existing or proposed tree planting. Large building, which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering the highest design quality and a thorough programme of landscape measures.</p> <p>It is welcomed and agreed that buildings which have a potential for "greater impact" should provide robust mitigation, however using a set height that does not consider AODs, established tree lines, etc. is inappropriate.</p> <p>There is no evidence or justification to conclude on 16m in height given the SPD identifies that the western part of the Site is open in character and without existing vegetation. The suggestion that there is no significant visual impact should be clarified to state with the establishment of new planting, as there will inevitably significant visual effects during the construction phases and early operational phases from the development of a greenfield site.</p>		

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		<p>The justification is not effective by ignoring AL3 and the permitted heights across this area of 21.5m. Placemaking / Urban Form 6.26</p> <p>The development framework AL1 suggests a series of key frontage opportunities across areas of new development, including along both the central green link / SUDs parkland, the A43, mirroring frontage on the southern side of the road, and the A5 adjacent to an access to the northern area of development. These frontages would require a considered approach to building orientation, materiality and massing to ensure an attractive and,</p> <p>The provision of “key frontage opportunities” is supported, but as per concerns raised above, this should be led by appropriate assessment and detailed design.</p> <p>Specific locations / frontages should not be set out in the AL1 Development Framework. 13</p> <p>Paragraph Draft SPD Text Comment where possible active building facade can be created. References to specific locations should be removed.</p> <p>It is important to reiterate the support for the overarching principles of the AL1 Development Framework, however it must be higher-level as to not overly restrict the ability of the AL1 site to deliver on the aspirations of Policy AL1.</p> <p>Summary DHL is supportive of the Employment Allocations SPD and welcomes the additional guidance, alongside the consistency in approach to development and elevated design standards it will bring. It is however considered that some significant changes are required to the draft SPD before it can be considered robust and deliver on its aspirations for delivering the highest quality of employment development.</p>		

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		<p>DHL would welcome the opportunity to continue engagement on the SPD, and strongly recommends a further public consultation is undertaken on the next draft given the significant nature of the amendments required to the document.</p>		
SPD209	Ann Atkin	<p>On Friday 12th August I travelled to Towcester down the A5 from the Astcote turn, and due to an accident/incident on the M1, the traffic at 7.45am was already solid from the Tove roundabout to the Traffic lights in the Centre of Towcester. At around 10.30am I returned to Towcester and the traffic was at a standstill going south from just after the Astcote turn on the A5. When we returned from Towcester, needing to come home via Greens Norton Surgery, we were met by endless cars coming the other way who had turned off the A5 heading south to make a short cut through Duncote and Greens Norton. If DHL, or any other companies that depend on transportation had been trying to move vehicles in or out of their sites they would have been severely hampered that day. Not to mention the added noise, pollution and inconvenience for the residents of Duncote and Greens Norton. This is not an uncommon problem and I hope that the Local Plan for the area around Towcester will be changed to allow more suitable developments.</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

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SPD210	Roade Parish Council	<p>RE: Supplementary Planning Guidance Response</p> <p>Thank you for the time you have spent drafting the Supplementary Planning Guidance for the Employment Allocation sites in the South Northamptonshire Local Plan Part 2. In response to the consultation, we have some points and recommendations to make which will, We believe, mean that developments will be more closely aligned to the original intentions of the Local Plan. By ensuring that the height of local buildings does not exceed those already in place we will be better able to maintain the character of our local market town and rural environment, both of which our residents want to see preserved. We also need to be mindful of the type of employment, which is needed for local residents, and of the need to reduce commuting in and out, so that we are able to meet our sustainability pledges, which form part of the council's core principles. Whilst WE recognise that logistics is a growth business, and the location of Northamptonshire makes it desirable for many companies to have a delivery hub here, we must adhere to the original intentions of the local plan (and in this guidance we must strengthen these intentions) to ensure that we create employment which is suitable for the population of WNC, and maintain a road network that will enable our residents to live, work and thrive.</p> <p>Background</p> <p>When the South Northamptonshire Local Plan Part 2 was adopted by SNC in July 2020, following years of work and consultation, the employment sites within it were targeted for small to medium sized units on the sites allocated. All these sites were given the prefix AL. In the foreword that Cll McCord wrote, he made this explicit by stating that the council would "aim to meet the demand for small and medium sized units by suitable land allocation." The small scale nature of what the Part 2 plan envisaged was repeated at page 57. The</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The wording 'in part' has been removed from the SPD. Additional wording has been added regarding AL3 to set out that</p>

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		<p>employment sites were part of strategy to reduce out commuting and keep skilled workers in the district. Policy EMP1 Supporting Skills makes this clear.</p> <p>Page 121 – 122 of the Local Plan states</p> <p>13.1.5 Strategic employment generation is focused through the WNJCS at Towcester and Brackley, Motorway junctions and at Silverstone. The district has 65 business parks and the new sites supported through the Part 2 Plan are intended to:</p> <ul style="list-style-type: none"> <li>• Meet local demand and strengthen the rural economy;</li> <li>• Provide the ability to strengthen local supply chains;</li> <li>• Local flexibility and choice of locations;</li> <li>• Meet the demand for small and medium sized units and</li> <li>• Contribute to reducing the level of out commute</li> </ul> <p>Page 123 para 13.2.1 states that the Towcester allocation sites AL1, AL2 and AL3 are</p> <p>to facilitate some additional small scale employment opportunities to provide additional choice and opportunity for the growing population and to look to reduce out-commuting.</p> <p>At para 13.2.2 the Local Plan states</p> <p>All three sites offer suitable locations for a range of new small and medium sized business units including uses that are ancillary or complementary to existing or proposed B Class uses.</p> <p>The usual definition of small and medium sized enterprises (SMEs) is any business with fewer than 250 employees. It is therefore clear that loopholes have been taken advantage of so that large corporations can develop these sites, going against the intentions of the local plan and thus failing to deliver on those intentions. The SPG must close these loopholes.</p> <p>Definition of Small, Medium and Large Units</p> <p>Whilst We welcome the attempted of the SPD to define Small, Medium and Large Units We believe there needs to be another category, that of very large, and very large units should only be</p>	<p>including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>	<p>alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>allowed on land adjacent to motorways which is not in the vicinity of residential areas. Small villages like Caldecote and Tiffield should not be under threat from mega units; the local plan was intended to protect them, not see a situation in which they were swallowed up by warehousing. The Local Plan was allocating land for small and medium sized business and they can meet their needs through small and medium units. We therefore recommend that the new guidance defines Very Large units as anything over 8000m squared and restricts their placement to land adjacent to motorways away from residential areas.</p> <p><b>Building Heights</b>  We have not yet had an answer as to why 16m was set as the height of buildings. We would like to see the height of buildings set at the height of current warehousing in the area, so that our natural environment is not threatened. Small and medium local business can bring employment to the area in buildings with a height of 12m. 16 metres seems designed to attract logistics businesses which are not going to attract the level of employment the area needs. We therefore recommend that no building should be taller than any existing building on or in close proximity to the site. For AL1 &amp; 2 this would be the existing Bell Plantation complex , Old Greens Norton Road area and Tove Valley Business Park area.</p> <p><b>Keeping Services On Site</b>  The SPD should make clear that all services and attenuation (for example rainwater balancing ponds) must be kept on site and within the allocation area, and land set aside to ensure biodiversity should be kept on site or be immediately adjacent to the development. The council should not allow the sites to gradually creep in size by allowing some of these services to be adjacent to the AL site. This would stick the small and medium size of the allocation and help ensure that policy aims of the</p>		

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		<p>local plan are delivered. A principle of 'dealing with your own smoke' onsite must apply.</p> <p><b>Traffic Surveys</b>  The SPD does not give any guidance on the traffic issues that many of these AL sites could give rise to. We accept that any planning application must be accompanied with appropriate traffic survey and mitigation proposals, nonetheless some extra guidance on the acceptable levels of increased traffic the local road network can tolerate, would be welcomed. Many residents are concerned as to the traffic impact with some of the proposals that have been submitted. Whilst each planning application needs to be considered in isolation, we need to focus on the cumulative effect of traffic. Therefore, we recommend the SPD should state what a full and comprehensive traffic survey for each of these allocations would be, and the level of traffic the Tove roundabout can tolerate without causing delays for local residents. The guidance should also lay out what mitigating factors should be put in place to relieve pressure on local residents when the M1 has issues.</p> <p><b>Employment</b>  The draft SPD at page 24 states para 3.2 that the role of the employment sites were in part to strengthen the local economy etc. The 'in part' addition is unwelcome. This gives a lot of wriggle room for other factors, no matter how spurious to be included 'in part'. The local plan is intended to provide land which small and medium sized businesses can use to expand in order to offer skilled and semi-skilled work to local residents, as well as to offer pathway employment.  We recommend that the words "in part" should be removed from page 24 para 3.2 to provide a more accurate representation of the Local Plan Part 2 as adopted. The SPG should build on the intention of the Local Plan by making it clear that the sites are</p>		



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		<p>for local employment and thus placing quotas onto applications so that companies have to recruit within a five mile radius. We must ensure that the new guidance is robust and provides the planning department with clear guidelines and rules so that developers cannot ruin our rural communities</p>		
SPD21 1	Abthorpe Parish Council	<p>Response to planning application: S/2020/2337/MAO Though not in our Parish this planning application does have a considerable negative impact on some of our residents, and due to the local increase of traffic will affect all those living in South Northamptonshire. We as a Council would like to object to this application for the following reasons: 1. Traffic. The development would cause an unacceptable increase in the local traffic, especially at the A43 McDonald's roundabout. It is noted that there is no South bound access to the A43 (needed for 60% of the site's traffic) so HGVs and LGVs from the Shacks Barn site will either have to go through Silverstone village and past the Primary school, go through Whittlebury and then part of Silverstone, or go all the way round a roundabout on the A43 (McDonald's) or the new proposed roundabout for the relief road south of Towcester. All of these options are clearly unacceptable. The effect on traffic for the A43 and A5 of this development has not been assessed in a cumulative way including the relief road and the other proposed sites for development in the Towcester vicinity. The A5/A43 roundabout to the north of Towcester is already inadequate for the current volumes of traffic let alone when there are problems on the M1. An up to date cumulative traffic assessment needs to be produced for all development applications in the</p>	<p>The consultation was regarding the draft SPD rather than the planning application itself.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations,</p>	No changes necessary.

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		<p>Towcester area due to the rapidly changing situation with the relief road and also other warehousing developments. The area needs to be assessed in the whole and not just to look at the accessibility of the site.</p> <p>This appears to be done by Highways England who as of last week still recommends rejection until more information is gathered on traffic in the local area of the development site.</p> <p>2. Height of the development is too high at 15-18m. This height of building will completely overshadow the surrounding area which it will dominate. The whole development will change the rural character of the area cause overbalance and create a negative visual impact. Assessment with AOD (above ordnance datum) gives some clear information about the visual effect this site will have on the locality.</p> <p>3. Context.</p> <p>The Towcester potential developments should not be compared with the area known as Swan Valley. The latter, which flanks the M1, is well situated for warehousing and this was a strategic decision to allow the buildings to be built in this valley. The Towcester applications are not strategic developments and it must be remembered that Towcester is an historic old town with many Roman remains which should be looked after and not built on. Its origins can be traced back to the middle stone age and thus it can be said to be as old as any community in Britain. It appears to have been settled continuously since then, as besides the Mesolithic remains, there is also evidence of Iron Age burials.</p> <p>4. Footprint size. The LP 2 had designated these sites around Towcester including the Shacks Barn</p>	<p>meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	

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		<p>application as small/medium development areas. However the more recent Supplementary Planning Document appears to designate this area for large scale developments of greater than 8,000 m2. This would appear to be an oversight as the site is not appropriate for such large scale development.</p> <p>There also seems to be some discrepancy in the size of the actual site . This needs to be confirmed with the proposed developers as they as their longer term strategy which would appear to include another parcel of land (Option 2) which may imply the developers are already looking at increasing the site further which we feel is already an over developed site.</p>		
SDP212	DPP PLANNING - WOOLGROWERS FIELD Ltd	<p>Our response will first set out the background of our application. The response will then address general comments on the Employment Site Allocations Development Brief SPD, before turning to comment on the site-specific elements of the SPD which relate to the development principles. In respect to the latter issue our comments relate solely to the employment allocation known as AL2.</p> <p>Our comments are set out under the following headings below.</p> <ul style="list-style-type: none"> <li>• Background</li> <li>• Timing</li> <li>• Need</li> <li>• AL2 Framework</li> </ul> <p>Background</p> <p>Our client is the Applicant for the site at Woolgrowers Field. The site is allocated for employment use under Policy AL2 of the South Northamptonshire Local Plan Part 2 (2011-2029). The wording of Policy AL2 is attached for ease of reference. DPP, on behalf of the client, submitted an outline planning application on the 27th October 2020 and was validated on</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations.</p> <p>The planning application 2020/2045.MAO is supported by a range of technical information which will be considered as part of the planning application process. This SPD will be a material planning consideration in the determination of future planning applications.</p> <p>The assessment undertaken as part of this SPD is not intended to be exhaustive, as such further</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>17th November 2020 under application reference 2020/2045/MAO. The application seeks:  “outline application with all matters reserved except access, for industrial and commercial development including a potential car showroom, builders' merchants and an emergency services hub.”  Ref: 3721LE/L004 2</p> <p>An indicative layout plan in support of the application was submitted to illustrate how the site could be developed and to allow officers to assess the principle of the scheme. This was simply indicative and further details of the layout of the scheme will be determined at a later date as part of a future reserved matters submission. A copy of the submitted master plan is shown below.</p> <p>As can be seen on the indicative masterplan, an emergency service hub is proposed along the southern boundary of the Site in close proximity to the site access, to allow swift entrance and exit for the emergency vehicles. To the north of this a car showroom, with associated parking. Within the eastern part of the site a divisible unit is proposed for industrial and/or storage use which can provide medium size commercial space. To the west of the site, the indicative masterplan shows a further flexible industrial and/or storage building which can be divided into a number of small footprint units as well as a potential builder's merchants and associated yard. The final layout mix and scale of the units will be considered at a later stage; however, the outline application proposes the following maximum floorspaces.</p> <p>Use GEA (sqm)  General Industrial (B2) and Storage and Distribution (B8)  12,793  Emergency Services Hub 2,322</p>	<p>contextual and site assessment and design work will need to be undertaken at planning application stage.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. However, there may be the opportunity for development proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area. Large proposals</p>	<p>The SD's wording has been amended in line with the suggestions from the Environment Agency.</p>

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		<p>Car Showroom 720 Builders Merchant 1,737</p> <p>The above maximum floorspaces and the indicative proposals have been informed by a market assessment prepared by JLL which provides an indication of the likely commercial needs in this part of Towcester and the surrounding area.</p> <p>In terms of the scale of the individual units, the floorspace will be dictated by the market at the time that of any reserved matters submission and will be within the parameters of the above maximum floorspaces.</p> <p>Ref: 3721LE/L004 3</p> <p>In terms of height, it is envisaged that the heights of the units will vary but will be of similar height to those within the wider area. For the purposes of the application, it was assumed that the maximum height of any of the units would be 11.5m to ridge.</p> <p>Comments have been received in respect of the proposed development from statutory consultees but following amendments to the scheme there are now no objections to the grant of planning permission.</p> <p>Further, during the course of the application there have also been no comments made in respect of the indicative masterplan, nor with regards to the maximum floorspaces or heights indicated on the plan.</p> <p>The application is currently pending consideration however all outstanding matters have now been resolved and we understand that the application is to be heard at planning committee on 12th September 2022.</p> <p>Timing</p> <p>The draft SPD was published in June 2022 and is the subject of a consultation period until August 2022. The draft SPD seeks to provide a framework to regulate development on the employment allocations in West Northamptonshire,</p>	<p>would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by the benefits.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. This will be assessed as part of the planning application.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include</p>	

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		<p>namely AL1, AL2, AL3, AL4 and AL5.</p> <p>Whilst we do not object to the SPD in principle, we would question the timing of the publication and its effectiveness. Whilst we do not doubt that the SPD has been in production for some time, and possibly before the submission of any of the planning applications on the sites, given that planning applications have been submitted for employment development on AL1, AL2, AL3 and AL4 and consent already granted on AL3, we would question whether this document is necessary. The purpose of the SPD is to set out the key parameters for the development of the sites, and whilst weight can be attached to the document through the decision-making process when the SPD is adopted, it would have been more beneficial if the document had been available prior to the submission of the various applications to ensure that the principles could be followed throughout the design process. The reality is that planning permission is likely to have been granted on the majority of these sites by the time the SPD has been reviewed, any modifications made, and the final version of the document published.</p> <p>Need</p> <p>Significantly, the draft SPD has been published after the date of the grant of planning permission on the Tiffield Lane site, known as employment allocation AL3, under planning application reference number S/2020/1644/EIA. The application for the AL3 site sought planning permission for:</p> <p>“Hybrid planning application comprising: Outline application with all matters reserved for an employment park comprising B1a, B1b, B1c, B2 and/or B8 uses, including ancillary offices (B1a), Sui Generis (selling and/or displaying motor vehicles, showrooms and petrol filling station), and/or A1 and A3 uses, service yards and HGV</p>	<p>improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	

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		<p>parking, plant, vehicular and cycle parking, earthworks and landscaping. Full planning application for a new roundabout access from the A43, internal spine road, substation, lighting infrastructure, engineering operations including foul pumping station, earthworks (including creation of development plot plateaus), pedestrian and cycle infrastructure and strategic landscaping including drainage infrastructure. (Application accompanied by an Environmental Statement)”</p> <p>The application was approved by Members of the planning committee on 27th January 2022, and the decision notice was issued by the LPA on 23rd June 2022 following confirmation from the Secretary of State that it did not need to be called in.</p> <p>Ref: 3721LE/L004 4</p> <p>Through the granting of planning permission, it is clear that the Officers, together with Members of the planning committee, were capable of assessing that planning application without the need for the SPD. Officers and Members of the planning committee evidently found that the proposed development was acceptable on this site without the need for specific design principles and a framework to guide the development. It is our view that the majority, if not all, of the design elements contained within the SPD can be dealt with through the planning application process. There is therefore plainly no need for the SPD.</p> <p>AL2 Framework</p> <p>The Council have undertaken a series of high-level site assessments including both desk based and site visits to underpin the contents of the draft SPD. The AL2 Framework therefore seeks to establish the key parameters and principles for the site.</p>		

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		<p>The Development Framework for AL2 is shown on the image below.  Ref: 3721LE/L004 5  We will now turn to comment on the site-specific requirements associated with AL2 under the headings below.</p> <p><b>Access and Movement</b></p> <p><b>Access</b></p> <p>In terms of access, the draft SPD requires a key access point into the site off Towcester Road / Greens Norton Road, from the south, which is to be sited at least 100 metres from Tove Roundabout.</p> <p>As illustrated on the indicative masterplan submitted with the planning application seeking the development of this site, the Applicant has proposed to access the site via a new access point taken from Towcester Road / Greens Norton Road. The access is to located approximately 180m from Tove Roundabout and therefore the proposed access meets this parameter of the SPD.</p> <p>Discussions have been undertaken with both the local highways authority and National Highways and it has been agreed that proposed access is suitable to serve the site. Therefore, we have no concerns with the inclusion of this in the SPD and indeed, we welcome the recognition that this is the most appropriate access point.</p> <p><b>Pedestrian Access</b></p> <p>The second elements considered under access is pedestrian access. The SPD requests that a direct connection to the existing footpath on the A5 is provided, as well as exploring potential options for providing a new pedestrian connection to Tove Roundabout from along Towcester Road. Again, as shown on the indicative masterplan submitted with the</p>		



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		<p>planning application for the development of the site, a pedestrian crossing is proposed across the roundabout junction and across to the existing path provided along the A5, as well as providing a new footpath along Towcester Road to link up to the new connection at Tove Roundabout. This has been assessed by the local highway's authority and found to be acceptable. Therefore, we have no concerns with the inclusion of this parameter in the SPD. Indeed, it is considered that the works proposed in the current planning application go beyond the requirements set out within the SPD.</p> <p><b>Pedestrian Footways</b></p> <p>The final criterion sought under the Access and Movement sub-heading relates to the pedestrian footways. The SPD simply indicates that these should be well-lit and suitable signs is provided in order to ensure public safety. Whilst this is not included in the planning application it is a matter normally dealt with in the Section 38 submission and it goes without saying that this will be provided. We again do not have any issues with this being included within the SPD, albeit to reiterate our point from earlier, this is something that would be dealt with through a separate process and does not need to be in supplementary guidance.</p> <p><b>Conclusion</b></p> <p>To conclude on access and movement, whilst we do not object to the guidance here it is noted that access and transport matters are covered by criterion 4 of Policy AL2 of the South Northamptonshire Local Plan Part 2 which deals with site access and the creation of new footpaths to link to existing networks and the need to provide a safe crossing points on the A43 and is all very similar to what is proposed within the SPD.</p> <p>Ref: 3721LE/L004 6</p>		

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		<p>Whilst we do not object to the inclusion of these elements within the SPD, as they are all provided for as part of the planning application, we would query the need for this given that Policy AL2 already sets out these requirements.</p> <p><b>Drainage</b>  The SPD indicates that an integrated and attractive sustainable drainage network, with swales located along green and woodland edges directing and filtering surface water to a basin located on the site's periphery, should be provided.  The Flood Risk Assessment and Drainage Strategy submitted alongside the planning application which seek permission for the development of the site sets out the proposed drainage strategy and states that in terms of surface water, the below ground geology suggests that infiltration will be non-viable and the report therefore recommends a restricted discharge rate, based on a 1 in 100- year return period storm event plus 20% for climate change, and this is to be discharged into the Duncote Brook on the western boundary. Both the LLFA and the Environmental Agency have confirmed that they have no objections to the proposals but suggest that a number of conditions are attached to any planning permission granted on the AL2 site. As such, this is already found to be acceptable without the need for the guidance within the draft SPD.  The SPD also seeks opportunities for the drainage network to offer ecological value, and the introduction of rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes. Some of these objectives would seem to conflict with the allocation. For example, AL2 is a small site in comparison to the other employment allocation and surface attenuation and swales would significantly reduce the sites developable area.</p>		

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		<p>Further, as an employment site there is likely to be yard areas and potential for spillage of hydrocarbons. It would be inappropriate to have permeable surfacing in such areas. We would therefore question the desirable and appropriateness of these objectives and object to their inclusion. In particular we strongly object to the location of the SUDs area shown on the development framework of AL2 as these conflicts with the drainage strategy submitted with the planning application and would not secure the most efficient use of the site as required by the NPPF.</p> <p>In any event such matters can be conditioned, and we would again question the need for the guidance in the SPD.</p> <p><b>Green Infrastructure</b></p> <p>In term of Green Infrastructure, the SPD seeks to introduce new planting to reinforce the northern, eastern and southern edges of any new development.</p> <p>To some extent this is accepted and indeed the indicative masterplan shows tree planting on all boundaries to reinforce the existing boundary planting. However, the key on the development framework suggests that this is to be in the form of tree planting. Perhaps a more effective boundary would include a mix of low- and high-level foliage. In addition, we have some concerns about the depth of the planting shown on the development framework for AL2 and in particular the northern boundary which is approximately 20 metres deep. This would seem excessive in order to screen views. Whilst the development framework can only be regarded as illustrative the depth of this planting here will significantly reduce the developable area and is plainly excessive.</p> <p>The development framework recognises that it is acceptable to have an active frontage onto the southern part of the A5, which is welcomed and supported, but that the northern part of the A5 frontage boundary should be reinforced with</p>		

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		<p>planting. This is illogical particularly as it will be located opposite the AL1 employment site, and we have seen no Ref: 3721LE/L004 7 justification for treating the two parts of the same boundary differently. We strongly object to how the new planting areas are depicted and the suggestion that these planting areas should solely be formed by tree planting.</p> <p>As such we consider that this consideration is best dealt with at the reserved matters stage, and it is another issue that can be agreed through the planning application process as opposed to the need for the SPD.</p> <p>Height, Scale and Massing</p> <p>In terms of height, scale and massing, the SPD suggests that AL2 is only suitable for small to medium sized buildings in order to avoid significant visual impact. The SPD defines small to medium sized buildings as being as follows:</p> <p>Small Between 250sqm-2,500sqm  Medium Between 2,500sqm-8,000sqm  Large 8,000sqm+</p> <p>We do not dispute that small and medium sized unit might be the best type of development on the site and indeed the masterplan that accompanies the planning application show such a range of buildings. However, this is not supported by local circumstances. The local area is characterised by large scale buildings, including a Tesco, Aldi, Screwfix and the Porsche Centre. Further, substantial distribution buildings are proposed on both employment allocations AL1 and AL3. In the context of the above it would be inappropriate to limit the size of the units on AL2 to 8,000sqm or below. We therefore strongly object to this provision.</p> <p>The proposed SPD also sets out that the proposed units will likely rise to approximately 10-12 metres high. The buildings</p>		

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		<p>that we have assessed as part of our planning application are 11.5m high and therefore fall within the parameters set by the Council within the SPD. It is also noted that these aspects of the proposed development have been found to be acceptable by the LPA officers given that no comments have been received in respect of the proposed height and that the application is to be heard at planning committee shortly. However, we would question this requirement as the development on AL2 will be seen in the context of what could be extremely large buildings on AL1 and AL3. We have not seen any justification for this height restriction. Until a robust justification is provided, we strongly object to this guidance.</p> <p><b>Placemaking/Urban Form</b> Under Placemaking and Urban Form, the SPD suggests that a key frontage opportunity is provided onto the Tove Roundabout and along Towcester Road. The indicative masterplan shows a draft layout for the scheme which would create a frontage onto Towcester Road. The recognition that there needs to be some visibility of the proposed development is welcomed. We support this provision.</p> <p><b>Heritage</b> In terms of Heritage, the SPD states that although any relationship is largely severed by intervening development, future proposals for AL2 should consider views along this alignment when preparing the arrangement, height and massing of any built form.</p> <p>It is clear from the wording that the Council accept that there is little intervisibility between the Site and the Easton Neston House. However, we would go as far as to say that there is no intervisibility when considered in the context of Ref: 3721LE/L004 8</p>		

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		<p>the heights that we are proposing. There are a wide range of land uses including residential properties and retail units between the Easton Neston House and the site, all of which block any views and therefore result in no intervisibility. Notwithstanding the above, the inclusion of a corridor through the site to retain views as depicted on the image on page 71 of the would result in a significant reduction of the developable area and therefore having a substantial impact on the schemes viability. It is on this basis that we strongly object to the inclusion of this within the SPD.</p> <p>Summary</p> <p>To summarise, we do not object to the creation of an SPD for the employment allocations in the District, but we note that the majority of sites now having planning applications submitted on them (AL1, AL2, AL3 and AL4) with AL3 having already been granted planning permission and the others will have planning permission shortly. Further, most of the matters covered in the SPD are addressed in the allocation policies themselves. Decision have clearly been made without reference to the SPD. We therefore have queried the need for the document. However, we do have some serious concerns relating to the parameters and guidance given in respect of AL2 and the lack or rational reasons or justification and as such we strongly object to the SPD</p>		
SPD213	Potterspurv Parish Council	<p>The stated aim of the South Northants Local Plan Part 2 was to identify sites that would be for small and medium-sized local businesses. The Council was well aware of the strategic location of the area and the attractiveness of sites AL 1-5 to the logistics industry. However, we are disappointed that none of the</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	No changes necessary.

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		<p>stated proposals appear to be for the benefit of small and medium sized local businesses.</p> <p>We would urge West Northamptonshire Council to adopt a more holistic approach when considering the various proposals for new logistic units alongside the A5, A43 and A508 in the Towcester area. As conceived, most of these developments will only increase traffic on local roads without any benefit for local communities.</p> <p>We believe that the imposition of these five sites as logistics hubs, in one form or another, will fundamentally alter the rural character of the area that West Northamptonshire Council says it wants to cherish.</p> <p>Traffic</p> <p>The SPD does not give any guidance on the traffic issues that many of these AL sites could give rise to. We accept that any planning application must be accompanied with appropriate traffic surveys and mitigation proposals, nonetheless some guidance would be welcomed. Many residents are concerned as to the traffic impact of some of the proposals that have been submitted.</p> <p>The installation of logistics units will have a detrimental effect on the local roads and on the lives of residents living nearby. The Northampton Gateway</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will</p>	

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		<p>logistics park currently under construction at the junction of the M1 and A508, which now appears to lack the promised rail connection, will generate a considerable amount of HGV traffic which will inevitably utilise the notorious Representing the historic South Northamptonshire village alongside the Roman Watling Street 'pinch point' of the Old Stratford Roundabout, the junction of the A5, A508 and A422.</p> <p>The addition of another logistics hub as promised by the AL5 proposals will simply exacerbate traffic build-up in this area. The knock-on effect when traffic is diverted off the M1, which happens several times a week, already paralyses the roads around our village. It will also increase the occasions when traffic which is trying to avoid congestion at the Old Stratford roundabout seeks to take a short cut through our narrow village roads. We hope that the SPD will advocate for a full and comprehensive traffic survey for each of the AL1-AL5 allocations and include the cumulative impacts and the consequences when the M1 has issues and traffic migrates to the A5 and A508. For example, approximately 9 miles south along the A5 at Fenny Stratford there is currently under construction 2 million sq ft of</p>	<p>need to mitigated to the satisfaction of the decision maker.</p>	



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		<p>warehouses. Some of this traffic will use the same stretch of the A5 that would be required for access to the AL5 Site. This needs to be included in such a survey.</p> <p>There would also need to be some reference to the times when the A5 and A508 serve as the alternative routes to the M1. The traffic assessment must acknowledge the strategic role of the A5 and A508 particularly when there are issues with the M1 via road works or traffic accidents. It is not acceptable to consider just the ideal case of a freely flowing M1 when assessing traffic flows. Local planning concerning traffic flows must include reliance planning.</p> <p>AL5 site Cosgrove/Furtho Pits</p> <p>Councillor Ian McCord has made very valid points in his comments submitted to you about the definition of size limits for buildings on this development, which we echo. The promotional literature by Framptons includes images of solar panels and we would suggest that WNC requires all such developments to include the provision of solar panels on industrial logistics buildings. In addition, the provision of electric charging points which could be used by local residents as well as employees would enhance the sustainability of the proposals.</p>		

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		<p>Potterspury is a small village and its residents use the A5 and A508 to go about their daily lives. It is already becoming increasingly difficult to be sure that previously simple local journeys can be undertaken without significant delays. Journeys into Old Stratford can take from 5 minutes to approaching 30 minutes with queues of stationary traffic extending from Old Stratford to Potterspury Lodge. As a parish council we feel powerless to control what is happening to our local area, especially with regard to traffic. We hope that West Northamptonshire Council will revisit the SPD and consider the effects of the SPD proposals on residents' health and lives.</p>		
SPD214	Sophie & Martin	<p>Application Number: S/2020/2337/MAO  Outline application with all matters reserved except access, for proposed mixed use employment site comprising of Use Class E (g) (Offices, R&amp;D and Industrial Processes), Class B2 (General Industrial) and B8 (Storage and Distribution). To include complimentary uses and associated works.  Location: Podium Business Park, Shacks Barn Farm, A43 Oxford Road, Silverstone  Whilst it is understood that the current application is an outline application with all matters reserved except access, the supporting documentation gives an undeniably clear notification by the developer of the intended parameters of the whole. No permissions for this current application or future applications should be granted</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken</p>

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		<p>until ALL the supporting documentation conforms to both the absolute letter of the Local Plan, specifically Policy AS4 AND its spirit within the parameters of the NPPF. Recommendations on the SPD to ensure that any developments adhere to the intent of the Local Plan have been produced in coordination with several experts at Save Towcester Now, The Silverstone &amp; Whittlebury Residents' Association and a qualified planning consultant. Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3 (which already has planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no southbound access into the A43, meaning all vehicles travelling south will pass directly through Silverstone village or Whittlebury. AL3 (Tiffield Lane) which already has planning permission, should be subject to the same SPD conditions on all future developments within that site ie on changes and extensions to the existing planning permission on that site. The size of the buildings that have already been allowed on this site must not be used as a precedent for the other sites.</p>	<p>development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p>	<p>to best shape a proposal for each site. The wording 'in part' has been removed from the SPD. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to</p>

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		<p>The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site and is well evidenced as the local precedent.</p> <p>Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester or a rural location such as Shacks Barn. and should not be used as a precedent. It is Strategic Development, whereas the LP2 allocations are ALL for Non-Strategic Development.</p> <p>The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be defined and specific – it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location. The existing development at Bell Plantation would be a good example of this.</p> <p>No building to be taller than any existing building on a nearby site ie for AL1 and AL2 this is site 4 (on page 28 of the SPD) and for AL4 this is site 6/Silverstone Business Park/Shacks Barn (on page 30 of the SPD).</p> <p>The control of the maximum ridge height of buildings on AL1 and AL2 should be 10 metres, whereas the maximum ridge height for the buildings at AL4 should be 7 metres. This is because of its rural location and position on the Whittlewood Ridge which lends to far reaching visibility of the site. That is the</p>	<p>Any harm would need to be outweighed by benefits.</p>	<p>encourage/steer applicants towards more ambitious design standards.</p> <p>Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact</p>

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		<p>precedent for the local area and would fit with the intent of the Local Plan (2) for small and medium sized units.</p> <p>It should be clarified that smaller/medium buildings cannot be joined up at later dates to form larger units.</p> <p>On page 24, para 3.2 we advise that 'in part' is removed from the role of the employment sites. These sites were never intended only as 'in part' for small, medium developments but rather, the WHOLE of the LP2 is for small and medium development.</p> <p>Screening using trees must be large scale, not planted with the possibility of full screening only after 15 years. Further, maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable screening.</p> <p>The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. This is of particular importance for AL4, where the developer has already attempted to increase the development site area by 28% through placing the drainage ponds outside of the allocated land area.</p> <p>All these employment allocations were based upon fulfilling employment need to reduce outcommuting.</p> <p>There is no evidence base for unskilled or low skilled warehouse jobs in South Northants.</p> <p>Developers need to demonstrate how their development will meet local skills requirements. They need to set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just</p>		<p>assessment in line with the general principles set out in the SPD.</p>

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		broad statements on types of jobs.		
SPD215	Blakesley Parish Council	<p>This is the response of Blakesley Parish Council to the consultation on the above.</p> <p>The Council would like to confirm its support for the attached document which it has received via the "Save Towcester Now" group, it highlights the key critical point which the Council has taken from the consultation.</p> <p>Supplementary Planning Guidance Document</p> <p>The views that are expressed in this letter are from Blakesley Parish Council and relate to both direct and indirect consequences of the proposed 5 developments.</p> <p>Whilst the Council do not object to the principle of development it feels that it should reflect the character of the area and the Local Plan (2) which came into being in July 2020 .</p> <p>1. Traffic</p> <p>There is already a problem with traffic, which has been exacerbated by the new residential developments of at least 2750 residential units at Wood Burcote and Towcester Racecourse,</p> <p>The relief road, or more correctly the link road, when built will help the south side of Towcester to an extent.</p> <p>The consequence of increased traffic movements is that a number of villages eg Greens Norton, Whittlebury and Blakesley become even larger 'rat runs', as vehicles try and get across from the A43 to the A5.</p> <p>Highlighted stress points include the roundabout on the A43/ Abthorpe Rd.</p> <p>The IMProperties scheme ( AL3) alone at Tiffield will generate 3000 extra traffic movements a day.</p> <p>2. Height</p> <p>Towcester is a market town and is an inappropriate location for a high bay major distribution centres.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work</p>	<p>Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change.</p> <p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process. The SPD will be amended to confirm that</p>

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		<p>Major distribution warehouse developments are generally found along the M1/M40 corridors examples being the BA Pension Fund scheme at Banbury and Prologis scheme DIRFT at J18 of the M1, where DHL already have a distribution centre.</p> <p>Eaves heights should be restricted to 12.5 m, a number of new warehouses at Banbury and Bicester including the Axis and DB Symmetry schemes as examples, where units range from 100,000 to 160,000 sq ft, they do not have higher eaves heights. The proposed eaves heights on AL1 are double, standard distribution warehouse heights.</p> <p>3. Size</p> <p>The Local Plan envisages small and medium sized units which the Council contends should be (SDP figures in brackets) small from 1500 sq ft – 10,000 sq ft ( as opposed to 2500-25,000 sq ft ) medium 10,000 to 50,000 sq ft( 25,000-80,000 sq ft), large 50,000+ (80,000sq ft which are not allowed for in the outline applications, except in AL2 Woolgrowers.</p> <p>Small businesses units like the ones on the Greens Norton to Blakesley Road should be catered for. Larger units generally employ fewer people and therefore do little for local employment.</p> <p>4. Sustainability</p> <p>The proposed BREEAM rating ' very good ' does not go far enough. An excellent certification should be the gold standard example being the Panattoni Park development , Northampton,</p> <p>5. Noise &amp; Light Pollution</p> <p>Units Lit up 24/7 and 365 days of the year are unacceptable in the rural environment.xp</p> <p>Light pollution for miles around when you combine AL1-AL3..</p> <p>There should be limited hours of access on Sundays and Bank Holidays.</p> <p>The Council's view is that none of the current five applications should be determined until the views of all the local Parish</p>	<p>at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p>	<p>the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the</p>

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		Councils are considered ( AL3 excepted as permission granted).		planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.
SPD216	M BALLARD	<p>There needs to be consideration of the cumulative effect of the increased traffic as a result of the developments around the Whittlebury/Silverstone/Towcester area. The traffic assessment must take a holistic view of the impact of all the planned local developments not solely the impact of the individual developments in isolation. The local area already becomes gridlocked at busy times especially when there are issues on the M1. The area will simply not be able to cope with the increased traffic levels associated with these proposed developments.</p> <p>It is inevitable that HGVs will inappropriately use local, small, rural roads as 'rat runs'. We have already had 'close calls' with HGVs nearly hitting children and pedestrians especially around the Whittlebury school area</p> <p>The size of the buildings must be no bigger than the small/medium buildings previously</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway</p>	No changes necessary.



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>envisaged. Larger buildings that have been allowed in line with the previous seriously flawed local plan should not be used as a precedent for future developments.</p> <p>The SPD must have clearly defined and specific requirements/regulations - not vague references that can be easily be circumvented by developers</p> <p>Proposed developments claims to providing local employment. This is clearly untrue. We are already aware that similar new developments are having to transport in staff from far away locations and not using a local workforce.</p> <p>There is no consideration of the impact of either the traffic or buildings on such an historic area</p> <p>The impact on the pollution levels has not been fully considered. It is clear that the huge increase in traffic movements coupled with the fact that the level of stationary traffic will increase in line with the inevitable gridlock will increase pollution to wholly unacceptable (and probably illegal) levels.</p> <p>Therefore, the proposed developments will result in congested roads, unacceptable high levels of pollution, dangerous traffic movements through small village roads, spoil the local environment and provide no local jobs</p>	<p>safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p>	
SPD21 7	T Lyons, Warwickshire County Council	<p>1. Introduction (i) Thank you for inviting Warwickshire County Council (WCC) to comment on the West Northamptonshire Council, Draft Employment Site Allocations Development Brief, Supplementary Planning Document (SPD) (July 2022). (ii) This response has been prepared by the WCC Transport Planning Team. 2. Consultation Response (i) The Draft SPD notes that</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>sites AL1, AL2 and AL4 described below are currently at planning application stage. We have undertaken a high-level review of the respective Transport Assessment (TA) submissions for these sites to inform our consultation response. (ii) We have also referred to West Northamptonshire Council's (WNC's) highway comments dated November 2021 in response to Technical Note FUP-BWB-GEN-XX-RP-TR-0002-SN for site AL5 which is understood to be at TA scoping stage.</p> <ul style="list-style-type: none"> <li>• AL1 - Land at Bell Plantation, Towcester - 111,709 sqm B8 employment, 4,000 B2 and 6 ha reserved for football pitches (northern parcel) and 31,800 sqm B2 and/or B8 employment (southern parcel).</li> <li>• AL2 – Land at Woolgrowers Field, Towcester - mixed employment use comprising 6,652 sqm B2/B8, potential 720 sqm car showroom, 1,737 sqm builders' merchants and a 2,323 sqm emergency services hub.</li> <li>• AL4 – Employment Land, Shacks Barn, Whittlebury - comprising 35,344 sqm B2/B8 employment.</li> <li>• AL5 – Land at Former Furtho Pit, Old Stratford/Cosgrove - 9 commercial units are proposed including Unit 1 as a B8 storage and distribution centre, the remainder to be flexible B2/B8 use, totalling 74,901sqm GFA. (iii) Based on information provided in the TAs for sites AL1 and AL2, our estimates suggest a combined total of approximately 80 two-way development-related vehicle trips on the section of the A5 to the north of A5/A43 Tove Roundabout, Towcester, on an average weekday in both the 8-9 am and 5-6 pm peak hours. (iv) Sites AL4 and AL5 are also likely to generate development-related traffic on this section of the A5, although it is more difficult to estimate the extent of this based on existing information. (v) This section of the A5 provides a strategic connection into Warwickshire and Leicestershire and directly supports access to a number of major employment sites, including Birch Coppice, the Horiba-</li> </ul>	<p>to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Further opportunities for joint working are welcomed.</p>	

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		<p>MIRA Enterprise Zones, Sketchley Meadows (Hinckley), Magna Park and also DIRFT in Daventry District.</p> <p>2   Page OFFICIAL</p> <p>(vi) All of these sites are either in the process of expanding or have plans to do so in the next 5-10 years. A further inter-modal freight facility is proposed in Blaby District, known as the Hinckley Strategic Railfreight Interchange (SRFI). (vii) Although the cumulative increase in traffic on the section of the A5 north of Towcester from employment sites AL1, AL2, AL4 and AL5 is likely to be relatively small, the combined effect of these sites and other spatial options in West Northamptonshire may lead to adverse impacts on local and strategic highway routes in Warwickshire, without an effective mitigation strategy.</p> <p>(viii) Key examples of critical routes and junctions in Warwickshire were outlined in our December 2021 submission to the West Northamptonshire Strategic Plan Spatial Options Consultation which is attached at Appendix 1.</p> <p>(ix) One of these junctions (A5/A426 Gibbet Hill roundabout to the north-east of Rugby) has been identified as a key RIS3 priority by Midlands Connect, the A5 Partnership and WCC.</p> <p>(x) National Highways is currently developing scheme options for improving the A5/A426 Gibbet Hill roundabout with technical support from officers at Warwickshire and Leicestershire County Councils.</p> <p>(xi) We consider it critical to ensure that this scheme development work is informed by robust and evidence-led assumptions which account for planned growth in our respective authority areas, including those in West Northamptonshire.</p> <p>(xii) We would therefore request an early opportunity to work jointly with West Northamptonshire Council to agree methodologies and scope for a Strategic Transport Assessment</p>		

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		<p>of shortlisted Spatial Options which are likely to be taken forward in the WNC area, so as to assess their cumulative impacts on key routes in Warwickshire, particularly at A5/A426 Gibbet Hill roundabout.</p> <p>1. Introduction  (a) This note outlines the consultation response from Warwickshire County Council (WCC) Transport Planning Team to the West Northamptonshire Strategic Plan Spatial Options Consultation.  (b) It focuses on specific spatial options which are considered to be most relevant to WCC in terms of their potential to impact on key routes and junction in Warwickshire.</p> <p>2. Spatial Option 2: Growth at Daventry  (a) WCC keen to ensure that the cumulative traffic impacts of Spatial Options 2a and 2b are appropriately assessed in terms of their likely impacts on the following routes:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> A45/M45;</li> <li><input type="checkbox"/> A425 Daventry Road;</li> <li><input type="checkbox"/> A361 Daventry Road.</li> </ul> <p>(i) A45/M45 Corridor  (a) As noted in our response to the Issues Consultation, WCC with consultancy support assisted Rugby Borough Council (RBC) to identify the strategic transport infrastructure and sustainable transport interventions essential to support major development allocations in the subsequently adopted Rugby Local Plan (June 2017).  (b) These included a major allocation at South West Rugby comprising 5,000 dwellings and 35 hectares of B8 employment land adjacent to the M45/A45 corridor.  (c) In December 2018, the A45 between M1 Junction 16 to the west of Northampton and the M45 south of Dunchurch was designated by DfT as part of the Major Road Network (MRN)</p>		

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		<p>comprising the busiest and most economically important local authority 'A' roads nationally.</p> <p>(d) WCC consider that Spatial Options 2a and 2b are likely to generate additional vehicle demands on the A45 MRN corridor which may adversely impact on capacity, road safety and air quality.</p> <p>(e) There is, for example, a capacity constrained traffic signalised junction at the northern end of the A45 at A426/B4429 Dunchurch Crossroads to the south-west of Rugby. Opportunities for further improvements over and above those already committed or planned to mitigate the traffic impacts of SW Rugby at this junction are extremely limited.</p> <p>2   Page</p> <p>(f) Furthermore, the whole of Rugby and surrounding villages including Dunchurch are covered by a single Air Quality Management Area (AQMA).</p> <p>(g) Therefore, WCC will be seeking to ensure traffic-related capacity and air quality impacts at this sensitive location in the centre of Dunchurch village brought about by further large-scale housing and employment growth in Daventry are effectively mitigated.</p> <p>(h) As part of the mitigation strategy for SW Rugby, there is a committed improvement scheme at the A45/M45 roundabout near Thurlaston which is currently undergoing technical approval.</p> <p>(i) An increase in development-related traffic on the A45/M45 corridor generated by Spatial Options 2a and 2b may lead to a requirement for additional capacity improvements at this location.</p> <p>(j) An increase in traffic volumes on the A45 MRN route between Daventry and Rugby also has potential to adversely affect an existing accident cluster site identified at the A45</p>		

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		<p>London Road/Longdown Lane/Woolscott Road junction north of Willoughby.</p> <p>(k) Our previous consultation response noted an apparent trend in the type of accidents occurring at this junction, with vehicles tending to overshoot from the side roads onto the A45.</p> <p>(l) Although a scheme has already been introduced to convert Woolscott Road to a Stop junction, it would appear that junction requires more comprehensive improvements to address the safety problem described above, such as the installation of traffic signals or a roundabout.</p> <p>(m) It may therefore be appropriate to secure developer funding contributions from site promoters of Spatial Options 2a and 2b towards further improvements if there are likely to be demonstrable development-related traffic impacts at this location.</p> <p>(n) The section of the A45 between its junction with the M45/B4429 and the Warwickshire county boundary which includes the junction referred to above has a poor accident record relative to its short length with high severity of injuries in comparison to other routes in Warwickshire.</p> <p>(o) WCC would therefore seek an opportunity to work jointly with West Northamptonshire Council and National Highways at an appropriately early stage to agree modelling assumptions, methodologies and scope for a Strategic Transport Assessment of Spatial Options 2a and 2b on the A45/M45 corridor and other affected routes which feed into Dunchurch and Rugby.</p> <p>(p) This assessment would seek to ensure that the potential cumulative traffic impacts associated with both of these spatial options are identified and appropriately mitigated where there are likely to be demonstrable impacts on capacity, road safety and/or air quality.</p> <p>3   Page</p> <p>(ii) A425 Daventry Road Corridor</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>(a) Spatial Option 2a may generate a journey to work trips which use the A425 Daventry Road east-west corridor and routes feeding it to access employment opportunities in Warwick, Leamington Spa, and potentially at Jaguar Land Rover at Gaydon.</p> <p>(b) Spatial Option 2b is a large-scale employment allocation which given its significant size is likely to attract employment trips from a wide catchment area, including towns and villages in Warwickshire served by the A425 Daventry Road corridor and surrounding routes.</p> <p>(c) Locations where these trips may originate include Southam, Leamington Spa, Warwick and Gaydon/Lighthorne Heath, a major new settlement in Stratford-on-Avon District comprising 3,000 dwelling located near M40 Junction 12 which is currently under construction.</p> <p>(d) Employment trips may also be attracted from smaller rural villages in Warwickshire, such as Bishops Itchington and Harbury.</p> <p>(e) There are a number of traffic-sensitive junctions on the A425 corridor itself and routes feeding it, for example the B4455 Fosse Way/Southam Road roundabout and the B4451 at Deppers Bridge which would potentially experience an increase in development-related traffic flows generated by these spatial options.</p> <p>(f) WCC would therefore seek an opportunity to work jointly with West Northamptonshire Council at an appropriately early stage to agree modelling assumptions, methodologies and scope for a Strategic Transport Assessment of Spatial Options 2a and 2b on the routes referred to above.</p> <p>(g) This assessment would seek to ensure that the potential cumulative traffic impacts associated with these spatial options are identified and appropriately mitigated where there are likely</p>		

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		<p>to be demonstrable impacts on capacity, road safety and/or air quality.</p> <p>(iii) A361 Daventry Road Corridor</p> <p>(a) Spatial Options 2a and 2b have potential to generate additional trip demands on the A361 corridor which connects with the A5 to the east of Kilsby.</p> <p>(b) The A361 also provides access onto the capacity constrained A428 Hillmorton Road/Ashlawn Road corridor in Rugby and other traffic-sensitive routes in the town, via Kilsby Lane and Barby Lane.</p> <p>(c) Large scale committed residential development at Houlton (6,200 dwellings) to the south-east of Hillmorton in Rugby is also likely to fall within the employment catchment area of Spatial Option 2b and it is likely that these trips would use the A5 and A361 corridors as the most direct access route.</p> <p>4   Page</p> <p>(d) WCC would therefore seek an opportunity to work jointly with West Northamptonshire Council at an appropriately early stage to agree modelling assumptions, methodologies and scope for a Strategic Transport Assessment of Spatial Options 2a and 2b on the routes referred to above.</p> <p>(e) This assessment would seek to ensure that the potential cumulative traffic impacts associated with these spatial options are identified and appropriately mitigated where there are likely to be demonstrable impacts on capacity, road safety and/or air quality.</p> <p>3. Spatial Option 3 – Employment Options at M1 Junction 18</p> <p>(a) WCC is keen to ensure that the cumulative traffic impacts of Spatial Options 3a and 3b are appropriately assessed in terms of their likely impacts on routes and junctions in Rugby and surrounding area.</p> <p>(b) Key examples of capacity constrained routes and junctions which may be affected by these options are listed below:</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<ul style="list-style-type: none"> <li><input type="checkbox"/> M6 Junction 1;</li> <li><input type="checkbox"/> A5 /A426 Gibbet Hill;</li> <li><input type="checkbox"/> A426 Leicester Road corridor;</li> <li><input type="checkbox"/> A428 Crick Road/Hillmorton Road/Ashlawn Road corridor;</li> <li><input type="checkbox"/> A426/A428/B4642 Rugby Gyrotory;</li> <li><input type="checkbox"/> Lower Hillmorton Road;</li> <li><input type="checkbox"/> The Kent/Hillmorton Lane;</li> <li><input type="checkbox"/> Lilbourne Road/Rugby Road/Newton Road (Cliton-upon-Dunsmore)</li> <li><input type="checkbox"/> Newton Manor Lane</li> <li><input type="checkbox"/> Newton Road/Newton Manor Lane (St Thomas Cross)</li> <li><input type="checkbox"/> Houlton Way/Clifton Road/Butlers Leap</li> <li><input type="checkbox"/> Central Primary Street (Houlton)</li> </ul> <p>(c) The significant scale of Spatial Option 3a to the east of the M1 is likely to generate additional commuter and HGV trips on already congested routes and at capacity constrained junctions and may require further mitigation over and above scheme interventions which are already planned or committed</p> <p>(d) WCC would therefore seek an opportunity to work jointly with West Northamptonshire Council and National Highways at an appropriately early stage to agree modelling assumptions, methodologies and scope for a Strategic Transport Assessment of Spatial Options 3a and 3b on the routes referred to above.</p> <p>(e) This assessment would seek to ensure that the potential cumulative traffic impacts associated with these spatial options are identified and appropriately mitigated where there are likely to be demonstrable impacts on capacity, road safety and/or air quality.</p> <p>5   Page</p> <p>(f) Representatives from WCC, Kier WSP on behalf of Northamptonshire Highways, National Highways, Urban &amp; Civic and Prologis currently sit on the DIRFT III/Rugby SUE</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>(Houlton) Transport Review Group (TRG) which meets bi-annually.</p> <p>(g) A key role for the TRG is to oversee and vote on proposals to mitigate unforeseen transport impacts which can be directly attributable to DIRFT III. The DIRFT III – Planning Consent Order and Consent Obligation (SI 2014 No.1796 – The Daventry International Rail Freight Interchange Alteration Order 2014) includes the following obligations:</p> <p>13 – to contribute towards the funding of additional highway improvement works out of the Additional Highway Works Fund (£1 million) as directed by the Transport Review Group where traffic impact is adjudged to be greater than originally predicted in the Transport Assessment.</p> <p>14 – to pay out of the Unforeseen Transport Impacts Fund (£500,000) as determined by the Transport Review Group for measures to address any unforeseen transport impacts arising out of the traffic generation from the development.</p> <p>(h) Should Spatial Option 3a Land to the East of DIRFT be taken forward, it may be appropriate to consider securing similar planning obligations to those already in place at DIRFT III for the proposed development, to mitigate potentially unforeseen development traffic-related impacts.</p> <p>(i) In terms of improving rail connectivity in the vicinity of Houlton and DIRFT, WCC continues to actively promote the development and construction of a new rail station south of Rugby on the Northampton Loop.</p> <p>(j) The Lead Designer for the station has now been appointed and will develop a station design that will provide for:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> 2 platforms with footbridge and lifts;</li> <li><input type="checkbox"/> Station car park;</li> <li><input type="checkbox"/> Public Transport Interchange;</li> <li><input type="checkbox"/> Active Travel connectivity.</li> </ul> <p>(k) The development activity to date has delivered the following:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p> <input type="checkbox"/> A refresh of the business case with updated timetable and destination information and a revised BCR and NPV for the scheme;         </p> <p> <input type="checkbox"/> Extensive timetable modelling to demonstrate the level of service that could be offered at the station;         </p> <p> <input type="checkbox"/> Appointment of a Lead Designer;         </p> <p> <input type="checkbox"/> Updated Demand and Revenue Forecasts which are currently being refined further to reflect post-COVID growth patterns as per the latest DfT modelling guidance;         </p> <p> <input type="checkbox"/> On-going stakeholder engagement with the relevant stakeholders including the DfT, Network Rail, West Midlands Rail and freight operators to ensure continued industry buy-in to the Scheme.         </p> <p>           (l) Further work is being undertaken to deliver the following:         </p> <p> <input type="checkbox"/> Outline Planning Application with all matters reserved for a new station development and including public engagement in Spring 2022;         </p> <p> <input type="checkbox"/> Land Acquisition. A proportion of the land has already been secured as per the acquisition strategy and negotiations are continuing regarding the other plots required to deliver the station and associated works.         </p> <p>           (m) The proposed location of the station which is referred to as Rugby Parkway is adjacent to the Houlton development to the south of A428 Crick Road, approximately 1 mile from M1 Junction 18 which is considered to be in reasonable walking/cycling distance of Spatial Options 3a and 3b.         </p> <p>           (n) It is currently anticipated that the broad timescale for delivery of Rugby Parkway is by 2026, which is the date assumed in the West Midlands Rail Investment Strategy for both 'return to growth' and 'low growth' Covid scenarios.         </p> <p> <b>4. Spatial Option 5a – Growth at Long Buckby</b> </p> <p>           (a) Although Spatial Option 5a is served by rail, there is potential for car-based trips generated by a residential         </p>		

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		<p>development of this scale to impact on rural routes in Warwickshire, potentially including The Rideway and Longdown Lane, the A45/M45 corridor and the B4429 route into Dunchurch.</p> <p>(b) WCC would therefore seek an opportunity to work jointly with West Northamptonshire Council at an appropriately early stage to agree modelling assumptions, methodologies and scope for a Strategic Transport Assessment of Spatial Option 5a on the routes referred to above</p>		
SPD218	CPRE G Caverhill	<p>1.1 CPRE is encouraged that West Northamptonshire Council (WNC) has acknowledged the need for planning guidance for the future allocation and specification of 'Employment Allocation' sites in South Northants, but is concerned about the impartiality of the consultant used to oversee the document, Barton Willmore. Their clients include DHL, who have an application for site AL1 and IM Properties, who have a permission for site AL3 as well as an application for site AL4. Barton Willmore consider themselves experts in achieving planning permission for the logistics industry. CPRE sees this as a conflict of interest.</p> <p>1.2 The South Northamptonshire Local Plan Part 2, which was adopted in July 2020, made provision for employment sites, known as AL1, AL 2, AL3 and AL4, for small to medium sized units. These sites were designed to "meet the demand for small and medium sized units by suitable land allocation." The sites were part of a strategy to "contribute to reducing the level of out commute" and ultimately to keep skilled workers in the district. The Local Plan also highlighted a need to "provide the ability to strengthen local supply chains" and "... to strengthen the rural</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner. The sites are allocated for employment use in the Local Plan Part 2. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>economy” as per 13.1.5, pages 121 and 122 of the Local Plan Part 2 (LP2). AL5 was later added to the allocated sites list.</p> <p>2. Comments and recommendations</p> <p>2.1 The emphasis on “small and medium sized business units” is repeated throughout the Local Plan Part 2, to include business units whose uses are ancillary or complementary to existing or proposed B Class uses. There is no provision for large scale units on any sites within LP2.</p> <p>2.2 The applications for sites AL1, AL3 and AL4 have shown that the applicants have seen fit to flout and misinterpret the wording of the LP2 when making their applications, to include mega warehouse developments similar in scale and size to those at Northampton Gateway, a strategic development adjacent to junction 15 on the M1. This interpretation is not compliant with LP2. Any deviation or re-interpretation of the original LP2 is not permitted under the 2012 Town &amp; Country Planning Regulations, which states that Supplementary Planning Documents cannot introduce new policy. This is acknowledged in paragraph 2.2 of the draft SPD. Despite this ‘own goal’, the SPD intends to introduce the potential for large scale and therefore inappropriate sized units to the sites. Paragraph 3.3 shows that the wording ‘large units’ has been inserted into the document. As there is no mention of ‘large units’ within LP2, this must constitute a new policy, and cannot be legally inserted into a supplementary planning document and therefore all references to ‘large units’ must be removed.</p> <p>2.3 The comparative definitions used in the Supplementary Planning Document (SPD), i.e. mega logistics units at Swan Valley by junction 15a of the M1, do not relate to the size and scale of units specified in the LP2, i.e. small and medium units. The size of units should therefore, in order to comply with the Local Plan, be re-defined as follows: A maximum height</p>	<p>heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.’ Additional wording has been added</p>

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		<p>criterion for buildings should be that no new building should be taller than any existing nearby building. AL1, AL2 and AL3 buildings should be no more than 10m in ridge height. AL4 buildings should be no more than 7m in ridge height, due to the site position being on the crest of a hill, Whittlewood Ridge, and visible for a considerable distance around the area.</p> <p>2.4 Paragraph 3.2 on page 24 of the SPD incorrectly states that the role of the employment sites is “in part to meet the demand for small and medium size units.” There is no such statement in LP2 stating that the sites are only catering ‘in part’. CPRE reiterates that LP2 strives to meet the demand for small and medium-sized units. This erroneous statement must be removed.</p> <p>2.5 Although the SPD has attempted to make a definition of what constitutes a small, medium or large unit, the definition of large – “8,000m<sup>2</sup> or larger” (with no upper limit) is so wide that you can drive a horse and cart through it, as well as several 38 ton articulated trucks! As has already been established in 2.3, the height of buildings should be capped at 10m and that wording should be added to the SPD to demonstrate that the largest permissible building footprint on any site in the area covered by LP2, if it is to comply with the non-strategic aims of the LP2, should be no more than 5,000 m<sup>2</sup>, i.e. medium-sized. This would also enable planning officers to clearly demonstrate a defined size limit to a developer and that large and very large units, such as the ones in the DHL (AL3) and IM Properties (AL4) applications, are not compliant with LP2 and therefore not permissible. Paragraph 3.21 of the SPD again alludes to ‘large units’. These comments should be deleted.</p> <p>2.6 CPRE does not accept that site AL3 should be omitted from any SPD discussion, just because it has outline planning permission, due to the danger that if full permission is granted without LP2 compliance being part of that permission, a</p>	<p>seek to encourage/steer applicants towards more ambitious design standards.’</p>	<p>regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>precedent for the other sites will be set, which could seriously compromise any future supplementary planning guidance.</p> <p>2.7 Apart from the size and mass of buildings being put forward by logistics companies, huge potential problems associated with these large scale developments and cumulative impact of traffic on the area is a major problem that has not been addressed. The SPD does not offer guidance on traffic impact from any of the sites and needs to give an overall assessment of the traffic impact on the area and not just on individual sites. This is a major omission and needs to be addressed.</p> <p>2.8 The wording of the Overarching Design principles for determining the appearance of the buildings needs to be defined and specific. It is currently too vague and open to interpretation by developers to create buildings that are not appropriate for rural locations. In paragraph 6.25, weak wording such as “Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 16m in height” is unacceptable and should be deleted as it is effectively sanctioning large buildings, which are not compliant with LP2. Again, the wording “large units... will only be considered in exceptional circumstances if acceptable mitigation is provided.” must be deleted in order to avoid opportunities on the part of a developer, or their barrister at appeal, to obtain permission by mitigation that is clearly not LP2 compliant. The SPD also needs to ensure that a restriction is placed on small and medium sized units when planning is granted, to ensure that they cannot be joined up at a later date to create larger units.</p> <p>2.9 It is important that all proposed buildings on all sites are placed within the allocation site area. This is particularly relevant to AL4, where the developer has already attempted to increase the development site area by 28% by placing drainage ponds outside of the allocated land area.</p>		

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		<p>Conclusion</p> <p>3.1 In its current form, the Barton Willmore version of the SPD is an exercise in corporate 'greenwashing', with vague and inconclusive statements and enough loopholes to give logistics developers carte blanche (this means to allow them to do what they want) to place inappropriate buildings in a semi-rural setting which is not suited, and was never meant for, large scale development of a Strategic nature. The South Northants Local Plan Part 2 was created as a blueprint non-strategic document to serve the employment needs of the South Northamptonshire community, not the corporate needs of remote logistics businesses.</p> <p>3.2 The Supplementary Planning Document needs to show that future development must be compliant with the SNC Local Plan 2, with clear, unambiguous instruction that cannot be misinterpreted by developers, and while it is understood that West Northamptonshire Council had inherited the Local Plan 2, it should be noted that the officers who authored the document deserve to not have the plan undermined. West Northamptonshire Council have a duty of care to uphold the contents of that plan and all of its adopted content.</p>		
SPD219	Public Health Northants S BEISHON	We would be keen to act work with businesses around health impacts that occupy the sites when they are confirmed. Highlighted text.	Comments noted.	No changes necessary.
SPD220	Whittlebury Parish Council	Response to Employment Site Allocations SPD Consultation Although generally supportive of the stated goals, Whittlebury Parish Council has a number of concerns with some of the details in the Employment Site Allocations Development Brief Supplementary Planning Document (SPD) Draft July 2022. Part of the AL4 Shacks Barn site is within the Parish of Whittlebury, and there has been a great deal of local concern over the proposed "Podium Park" development. This SPD is intended to clarify the design guidelines and development	The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals	The consistency of language will be addressed where necessary.



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>principles for the allocated sites, which we welcome, and we have the following feedback on the draft document.</p> <p>1. Scale categories - Small, Medium and Large The three scale categories for employment buildings/units defined in the draft SPD is a cause for concern as the Parish Council feels strongly that each of the categories is too broad. As defined, even the "Small" scale of 250 to 2,500m<sup>2</sup> is hardly small at the upper end, as 2,500m<sup>2</sup> is more than double that of the largest units on the existing AL4 Shacks Barn site which are 1,200m<sup>2</sup>. The "Medium" scale of 2,500 to 8,000m<sup>2</sup> allows for units that are significantly larger than anything in the local area today, and is totally inappropriate for a rural setting. The "Large" scale from 8,000m<sup>2</sup> upwards has no upper bounds, and is enormous and even more inappropriate for a rural environment.</p> <p>In arriving at these categories, the authors of the draft SPD have referred to Swan Valley and Silverstone [Technology] Park, but these sites are very different in terms of size, scale, location and road connectivity to the relatively small site and rural location of AL4.</p> <p>The Parish Council would like to see greater granularity in the scale categories, perhaps with 4 or 5 categories, to allow a true Small and Medium scale, suitable for the sites around Towcester and AL4 in particular.</p> <p>2. Scale of Development at Shacks Barn AL4 For context, the Local Plan states that the AL4 site was intended "for additional small-scale employment opportunities", and "for a range of small and medium-sized businesses". This is what the Parish Council and local residents were led to believe was planned for this site, but the definition of the "Medium" category in the draft SPD gives the Parish Council serious cause for concern, and does not align with the original stated intentions.</p>	<p>would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>The draft SPD suggests that the “appropriate scale of buildings on AL4 is likely to be small to medium”, which sounds reasonable until the definition of Small and Medium categories in this draft SPD is applied. The Parish Council believes that the scale of buildings allowed on AL4 should at most be Small by the definition in this SPD.</p> <p>6.65 The appropriate scale of buildings on AL4 is likely to be small to medium due to its topography, irregular shape and proximity to Silverstone Business Park, an area with small to medium units. This may see development rise to approximately 10-15 metres in height.</p> <p>“Small” is defined as 250 – 2,500m<sup>2</sup> and the current size of units on Shacks Barn is 1,200m<sup>2</sup>, so even that would be more than double the current size. “Medium” in this document is defined as 2,500 – 8,000m<sup>2</sup> which would represent a massive increase in size from the current 1,200m<sup>2</sup> units. The Parish Council believes that buildings up to 15 metres in height are way too high and completely inappropriate for this rural site.</p> <p>6.65 [continued] The site's capacity to accommodate large units is further limited by restricted access onto the A43, with no direct southbound slip road access onto the A43 - alternative southbound access is provided via Silverstone.</p> <p>This “restricted access on the A43” (no south-bound slip roads) should call into question the site's capacity to take Medium units, not Large.</p> <p>6.66 Large units, which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit, will only be considered in exceptional circumstances if acceptable mitigation is provided such as delivering the highest design quality and thorough programme of landscape measures.</p>	<p>an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The consistency of language will be addressed where necessary..</p>	

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		<p>The Parish Council believes that site AL4 should be limited to "Small" units, as the "Medium" category defined by this draft SPD is too big for this site.</p> <p>The Parish Council is extremely concerned that paragraph 6.66 appears to allow developers to propose "Large" units (over 8,000m<sup>2</sup>) "in exceptional circumstances" which is open to interpretation and exploitation. There should be no option for this size of unit on the AL4 site as there never could be any acceptable mitigation for buildings greater than 8,000m<sup>2</sup>.</p> <p>3. Visual Impact for Development at AL4</p> <p>The draft SPD contains a number of photographs showing the rural landscape around AL4. It is hard to imagine how any development with the proposed definition of "Medium" sized units would not significantly impact that landscape.</p> <p>Although the nearby Silverstone Fields Farm (Linnell Bros timber merchant) site has one unit just over 2,000m<sup>2</sup>, this is situated in a low-lying location which is hardly visible from the road.</p> <p>Being on a ridge the AL4 site is quite high, in a prominent location in a rural setting, mostly surrounded by fields and visible from miles around. It is hard to see how any design or landscaping could reduce the visual impact of warehouse units with a roof height of 15 metres (if allowed).</p> <p>The Parish Council believes that buildings up to 15 metres in height are totally inappropriate for this rural site and that development on site AL4 should be limited to a maximum of 7.5 metres in height in keeping with the location and the existing development.</p> <p>The Parish Council is also concerned about the visual impact of floodlights that could accompany the use of warehousing and distribution, and would like to see the SPD protect against this.</p> <p>A "high quality landscaped setting" sounds desirable but is open to interpretation. The Parish Council believes the SPD</p>		

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		<p>should clearly state that any planting that is designed to mitigate the visual impact of industrial units needs to be wholly within the AL4 site boundary, needs to be adequate within a defined timeframe, and needs to be strictly monitored and enforced. For reference, the Council has seen inadequate and poorly enforced planting at the nearby solar farm where the solar panels were meant to be adequately screened but are still clearly visible several years later as the "hedge" planted is still less than 1 metre high.</p> <p>4. Transport - Inadequate Road Infrastructure for AL4 The Parish Council remains very concerned that over-development of site AL4, together with other employment sites in the Towcester area, will have a severe impact on the traffic and congestion of the local road infrastructure which is already a major problem for the village of Whittlebury and surrounding areas.</p> <p>The draft SPD does mention in passing that the AL4 site has "restricted access on the A43, with no direct southbound slip road access onto the A43", but it does not acknowledge that this will mean that a significant proportion of the traffic to/from the site will pass through local villages and over rural roads which are unsuitable for heavy goods vehicles.</p> <p>The Parish Council is disappointed that there is nothing in this draft document that talks about the impact of traffic on the local road network, or the unsuitability of the local roads to carry heavy traffic to/from these employment areas. There is a huge difference in traffic flow for the different classes of use, and although "a variety of employment types" is encouraged, there is nothing to stop large B8 warehouse units being proposed for the AL4 site, despite the rural location, already struggling local road network, and the incomplete A413/A43 dumbbell junction which has no southbound sliproads.</p>		

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		<p>Despite being on the junction of the A43 and A413, this site does not have good access to the road network. In addition to the lack of direct access to the south side of the A43, there is no bus service, nor are there footpaths or safe cycling routes. Additional traffic will have to use the A413, going directly past local primary schools in Whittlebury and Silverstone villages. Despite being an A road the A413 is not suited to HGVs, and nor are the local roads, which again makes this site totally unsuitable as a warehouse/distribution hub.</p> <p>As a result of the incomplete A413/A43 junction, South-West bound traffic from AL4 is very likely to use the A413 through Whittlebury and Akeley villages to Buckingham or worse, the A413 via Church Way towards the A43/Brackley/M40.</p> <p>South-East bound traffic (e.g. to Milton Keynes) would very likely use the A413 and Cowpastures Lane to get to the A5. Cowpastures Lane is an unclassified single carriageway country road passing through Whittlebury Parish, currently used as a rat-run for traffic between the A5 and A43. The so-called "Towcester Relief-Road" is unlikely to mitigate this, as it is not a bypass, more an access road to the Towcester SUE housing estates, and Highways have admitted it will be unsuitable for heavy traffic. Even when the new road is completed, the Cowpastures route will remain shorter and contain fewer roundabouts than the relief road, so will be more attractive to HGVs travelling to/from A5 South.</p> <p>As a reminder, the original site allocation for AL4 was for "for additional small-scale employment opportunities", and "for a range of small and medium-sized businesses" which would provide for local employment. This is very different to a proposal of mostly B8 warehouse units for storage and distribution with associated movements of HGVs thundering down rural roads and through local villages, past local primary schools.</p>		

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		<p>The Parish Council believes the SPD should address this more clearly, with strong guidance towards the development of AL4 being more suitable to its smaller footprint, rural location and inadequate connection to the road network (to be clear, that is totally inadequate for the HGV traffic generated by a storage and distribution hub).</p> <p>The Parish Council would like to ensure that any transport assessment must include the traffic impact on local highways, especially if a developer should choose to submit plans for a combined warehouse and distribution depot for HGVs. Quite importantly, this should be part of a cumulative traffic assessment taking into account the other large-scale developments in the Towcester area which will cause the already congested road network, including A43 and A5, to become seriously overloaded.</p> <p>The Parish Council is also concerned about the additional impact of goods vehicles on the local roads if a 24x7 distribution operation were to be permitted, and would like to see the SPD protect local residents from this.</p> <p>5. Business Use – Employment Mix</p> <p>The original site allocation for AL4 was for “for additional small-scale employment opportunities”, and “for a range of small and medium-sized businesses” which would provide for local employment, with an aim “to attract new investment and provide more jobs to match the skills of local people”.</p> <p>The Parish Council is concerned that recent outline planning applications for the AL sites, including the recent application for Shacks Barn (site AL4), have tended towards providing large B8 warehousing units with multiple HGV loading bays. Not only do these units cause concern for their traffic impact on the local road network, and the visual impact of large units against a rural environment, but they threaten to fail to deliver the</p>		

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		<p>employment opportunities that the AL sites were intended to provide.</p> <p>The Parish Council believes the SPD should make clear that development of the AL4 site should provide facilities for a range of small to medium sized businesses with an employment emphasis on skilled, managerial, professional services, and technology, and should not be allowed to be developed for oversized B8 warehouse units forming a distribution hub that does not provide a mix of skilled jobs and employment opportunities for the local area. A development largely composed of warehouse space would provide mostly low skilled jobs for workers who would likely have to travel from further afield, increasing commuting traffic.</p> <p>6. Inconsistent use of Shacks Barn [Farm] and Silverstone Business Park</p> <p>Site AL4 is referred to as “Land at Shacks Barn” in the Part 2 Local Plan. In this draft SPD document it is initially referred to (pages 6, 12 and 94) as “Shacks Barn” or “Shacks Barn Farm”, but in other sections of the document (pages 38, 51–55 and 74–77) site AL4 is referred to in text and diagrams as “Silverstone Business Park”.</p> <p>This inconsistency within the draft SPD document is confusing, especially as the document also makes reference to “Silverstone Park”, which is a much larger science and technology park adjacent to Silverstone circuit, referred to in recent planning applications as “MEPC Silverstone Park”.</p> <p>The outline planning application for site AL4 has been submitted using the commercial name of “Podium Business Park, Shacks Barn Farm”.</p> <p>The Parish Council would like to see the SPD amended to refer to AL4 consistently as either the “Land at Shacks Barn” or the “Shacks Barn Farm” site.</p>		

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SPD22 1	R Brightman		Query with AM - provides his CV not sure what to redact	
SPD22 2	S Payne	<p>I am writing to register my response to the proposed South Northants Supplementary Planning Guidance Document which is currently undergoing consultation.</p> <p>Firstly, I would like to express extreme concern over the increased amount of traffic which the proposed developments - particularly AL1 (the DHL development) will produce. Estimates appear to be around 350 HGV movements PER HOUR on this development which will severely impact the A43, A5, A508 and all village roads in the immediate area, which already become severely congested daily not only at rush hour, but also whenever there is an incident on the M1 and any kind of roadworks in the area (also almost a daily occurrence with recent works on A508 for Roade bypass and HS2/train works). I have seen no documentation anywhere which attempts to either explain how this amount of extra traffic will be managed, or give any possible solutions to mitigate this. Greater detail is required for the SPD, at the very least a comprehensive, cumulative traffic survey needs to be carried out to cover all sites and provide an accurate analysis of the massive detrimental impact on local traffic the developments will make. Continuing on the topic of traffic impact, could you please tell me if National Highways and West Northants Highways have joined up the dots between all the new proposed</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>different sites in the area and see the links in the enormous amount of strain on local roads? By this I refer to 1) the increased traffic from the AL1 project (DHL warehouses); 2) the increased housing and therefore increased amounts of daily traffic from hundreds of new residents in the proposed new housing areas both in Towcester and at the Milton Keynes end of the A5 at Old Stratford/Stony Stratford roundabout; and 3) the recent amendment to the original planning application regarding the SEGRO Northampton Gateway Development which will impact Roade, Blisworth, Towcester and surrounding areas which proposes early use of warehouse units ahead of the completion of the rail/freight interchange. Finally I refer to the AL3 Tiffield development, and I would like the SPD to include that the same conditions on future developments should be observed, specifically that the size allowed for this one should not be used as a precedent for other sites - the local plan specified 'small and medium-sized units' which was then disregarded (the SPD has added 'Large units) and should not be allowed to happen again in this predominantly rural area. It should also specify/clarify that smaller units cannot then be joined up together in the future to make larger units. These restrictions should also take into account a limit on the height of buildings to be no more than 10m AOD, and drainage and planting should be legally</p>	<p>considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>binding and continuous until fully established, therefore creating actual screening from the developments, not the bare minimum planted to be forgotten so that residents are left with buildings which are eyesores and out of keeping with anything in the area.</p> <p>I trust that my views regarding the matters above will be taken into consideration along with those of other concerned residents and parties and I look forward to being fully updated on the above email address at your earliest convenience.</p>		
SPD223	P Taylor	<p>I have recently been reviewing this document and feel obliged to forward on some of my opinions and concerns.</p> <p>My first issue is with the sheer size of the developments proposed. The added proposal of buildings designated 'large units' is unacceptable, the original proposals were for 'small and medium sized units'. To add a building of 8000 sq metres, and with no limit is unthinkable.</p> <p>The Swan Valley industrial site (M1 / Jcn 15a ) is colossal in scope and scale. It is an unattractive necessity placed in an ideal and functional location: adjacent to the motorway network, close to a town with a logistics workforce and in a hub of industrialisation.</p> <p>Towcester has none of the above. To build similar sized warehouses in the Towcester area is preposterous and would be totally out of keeping. I understand 5000 sq metres is the original standard size for such units in the area.</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	<p>Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be</p>

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		<p>The height of some of these constructions bothers me. AL3 (Tiffield Lane) has planning permission. The height of these buildings is too much (10m) and should not be used as a precedent for 'small and medium' sized buildings elsewhere. Equally I would like it ensured that 'small and medium sized' buildings are not allowed to link up at some future date.</p> <p>The second issue is that of traffic. Should the developments proceed, the cumulative amounts of traffic in the area will be unbearable...literally. It is my understanding that the relief road west of Towcester will not be a trunk road. Traffic will flow through the town via the A5. The A43 north and south will be impacted heavily. Severe congestion already exists within and around Towcester. The two roundabout systems on the A43 north of the town are often unfit for purpose through sheer congestion. The A5 is often congested north/south to Old Stratford roundabout. Add hundreds of HGV's and workers travelling to their places of work and it is quick to see gridlock. Presently when the M1 is closed, Towcester becomes a diversionary 'rat run' and comes to a standstill. The River Tove occasionally floods, closing the A5 completely. Congestion will become a by word for Towcester. Workers will travel to Towcester also and probably by car and throughout the day. There is little to no alternative to the car in such a semi rural, diverse location.</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>subject to a further impact assessment in line with the general principles set out in the SPD.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>I am assuming that cumulative traffic assessments will be submitted along with any further development along the A43/A5/ ove/Abthorp roundabouts and be added to the existing AL3 access assessments?</p> <p>Finally, please think of externalities, not everything has a cost benefit. Towcester is a historic small coaching town with some notable architecture. It is set in some glorious rural countryside with complimentary villages, areas like this need to be cherished and gradually developed.</p> <p>As the population of the UK is near 68 million the needs of the nation are pressing. Housing, employment and transport links need to be met; it is a given. However, there are more suitable locales within the region, with less impact and with areas that do require accessible employment.</p> <p>Much of the current SPD is abruptive in respect of size, scope and implementation. It will destroy the very fabric and aesthetics of the area, changing it utterly.</p>		
SPD22 4	L Croft	<p>Please accept this email as my response to the Supplementary Planning Document dated July 2022, submitted by WNC in conjunction with Barton Willmore. The reason the SPD has been written is because the Local Plan (2) was hastily voted through by SNC as one of its last throes before it absorbed into WNC; as a result checks and balances were not in place which allowed opportunistic developers to swoop in and submit plans that were</p>	<p>The planning application on AL3 Tiffield Road was approved and now has planning permission. The SPD can be reviewed should this be deemed necessary in the future. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local</p>	<p>The wording 'in part' has been removed from the SPD. The SPD will be amended to</p>

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		<p>completely inappropriate with the spirit, intent (and indeed wording) of that LP.</p> <p>I am therefore at a loss to understand why AL3 (the IMP proposal for Tiffield Lane) has been excluded from the remit when it is precisely the type of development the SPD seeks to prevent.</p> <p>Far greater scrutiny is still needed into the Planning Decision on 27th January as I and many others believe the process was flawed. Regarding page 6 para 1.10 the fact is that the decision to seek SPG was announced at the SPC meeting before the approval decision was made and Barton Willmore were appointed (February 2022) and the SPD was written (In March/April/May 2022) when the Final Decision Notice on AL3 had NOT been signed off, indeed that decision was under review by the Dept. Levelling UpHC at that time – therefore it would have been entirely possible and justified for AL3 to also be covered by the SPD. That omission has exposed WNC to the real risk that developers of A1/2/4 will cite AL3 as the existing precedent for their proposals so it is vital that this is not allowed to happen. If this cannot be guaranteed then everyone has wasted their time (and public money) on the SPD.</p> <p>I welcome the SPD to reduce “uncertainty” and ‘provide a robust and clear development framework’ but the current loose wording does not achieve that. ‘Should, may, where possible, look to” must be replaced with imperatives, otherwise the developers will reinterpret any ambiguity to suit their own narrative and requirements – which is what happened with the Local</p>	<p>flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.’</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree</p>	<p>confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via</p>

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		<p>Plan (2) and led to the current situation.</p> <p>1.7 The SPD needs to emphasise that sites AL1-4 were identified to facilitate non-strategic small scale employment opportunities to provide additional choice and opportunity for the growing population associated with the strategic development site to the south of Towcester. Therefore Swan Valley is not a relevant contextual consideration for those sites (page 26). The relevant context for AL1 and AL2 is site 4 (page 28) which is for small and medium scale, form and character employment development. The relevant context for AL4 is the adjoining Shack's Barn development (page 30) also for small and medium scale. As a result, the maximum footprint must be restricted to 5,000 sqm and below as that is the established and existing precedent. The SDP must also include a section that prohibits the future joining up of multiple smaller/medium buildings at a later date.</p> <p>South Northamptonshire's Economic Growth Strategy Page 19 para 2.15 The West Northants Joint Core Strategy (2014) Local Plan (1) states that "some elements of manufacturing related to the high performance technologies sector are growing but often means fewer employees due to successful mechanisation". This is true, but the strategy fails to mention that exactly the same is happening with warehousing, but on a much larger scale, and without the benefit of high performance technology jobs at scale, as the WNJCS required.</p>	<p>heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	<p>the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>I agree with the SPD statement on Warehousing “that delivering new space to cater for the warehousing sector on a trend-based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy”. The current proposals for AL1/2/3/4 sites are completely trend-driven with no provision for future growth requirements.</p> <p>Research and Development. South Northants has a very rich history of applied R&amp;D in areas such as automotive advanced manufacturing. None of the current proposals for all 4 development sites appear to meet this objective.</p> <p>All these employment allocations were based upon fulfilling employment need to reduce outcommuting. There is no evidence base for unskilled or low skilled warehouse jobs in South Northants. Developers need to demonstrate in detail how their development will meet local skills requirements. It should be a requirement that the developers set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on possible types of jobs. The SPD should include a % restriction on the total workforce permitted to in-commute. Page 21 outlines very clearly why the jobs provided by B8 warehousing will not meet the skill set and educational attainment of the locality. Page 20 para 2.22 The SPD describes very clearly the 5 roles set out in the Part 2 Local Plan to ensure they meet local demand. The SDP must reinforce the importance of developments to</p>		

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		<p>comply with and meet all 5 tests namely:  Meet local demand and strengthen the rural economy;  Provide the ability to strengthen local supply chains;  Local flexibility and choice of locations;  Meet the demand for small and medium sized units; and  contribute to reducing the level  of out-commuting.</p> <p>Part 2 Local Plan  2.21 The SPD needs to reinforce that the aim of the Local Plan is “to attract new investment and provide more jobs to match the skills of local people”. Local skills means meeting the needs of  Towcester and South Northants where skills and education attainment are significantly higher than those of West Northants and the extended region, without this there is a inevitability of  lowering the overall local skills set and thereby the economic profile of the area.</p> <p>2.23 The employment sites “are to be accompanied and supported by an independent study providing market led evidence on the proportion of B1, B2 and B8 uses to be delivered”. The SPD must state that any study should be both current and truly independent, based on verifiable market demand, not on justifying their proposed use. To be demonstrably independent these need to be commissioned by WNC, otherwise we continue to run the risk of accommodating the developers’ agenda.</p> <p>Socio-Economic Context  Page 21 2.30 Refers to the Halifax Quality of Life Survey (2017) and that South Northants is a</p>		



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		<p>good place to live, with a “skilled workforce, good education rates and low deprivation”. The SDP should emphasise how important it is for any development to maintain and improve that status, any compromise caused by development will not be acceptable. This requirement appears to have been ignored by the developers as increased traffic, visual blight, noise and air pollution will all have a deleterious effect on the existing population.</p> <p>Scale, Form and Character Page 24 3.3-3.5 Swan Valley and other large scale strategic developments along the M1 must not be used as a relevant comparison to the non-strategic, small and medium developments sites round rural Towcester. It is obvious that Swan Valley has no similarities with Towcester or the A43 technology corridor. Swan Valley an open, very large group of sites, with no established housing nearby, and with immediate access to a major arterial route which is one of the largest motorways in the UK. Swan Valley largely consists of large scale, predominantly distribution developments. The SPD needs to be quite clear that Swan Valley is not contextual and does not set a precedent for Towcester and its environs.</p> <p>I repeat, Swan Valley, beside the M1, has no contextual consideration to a historic rural town like Towcester or a rural location such as Shacks Barn (AL4) and must not be used as a precedent. It is Strategic Development, whereas the LP2 allocations are ALL for Non-Strategic Development.</p>		

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		<p>Page 24, para 3.2 'In part' must be removed from the role of the employment sites wording.  These sites were never intended only as 'in part' for small, medium developments, indeed wording for the land allocations in the LP2 (page 121-122) is "to meet the demand for small and medium units". Therefore there can be no 'exceptional circumstances' (page 38) where large units will be acceptable on AL1-4. I would ask for this to be included in the SPD.</p> <p>AL1 &amp; AL2  3.10 and 3.12-3.14 The SPD recognises that the scale of development at Old Greens Norton Road and Tove Valley Business Park varies between 350sqm and 5,000msqm. Even at Silverstone Business Park and Silverstone Park the units are between 250m2 and 5,000m2. No unit exceeds 5,000sqm.  The SPD acknowledges that there is a corridor of technology-related employment emerging along this stretch of the A43. Therefore, the SDP should promote and give preference to the opportunities this presents for Towcester. There is considerable scope for the technology corridor to extend from Silverstone to the Towcester Northern Gateway – an approach which has a far closer fit with the skills and educational attainment levels in the area.</p> <p>Rural Setting  3.15-3.17 The assessment of the area surrounding AL1 and AL2 to the north of the A43 is appropriately characterised by land form that gently slopes north to south down to the River</p>		

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		<p>Tove with views from the public road and path network towards Towcester and the wider countryside, and that there are a series of small settlements largely of a height and scale in keeping with that of large agricultural buildings in the area. Please also note in the SPD that the proposed development of Shacks Barn (AL4) stands upon the Whittlewood Ridge with wide ranging visibility for miles around. The SPD needs to be clear that a large agricultural building, such as Figure 19, does not relate in form, scale or character to a monolithic warehouse. It is far more akin to a small industrial unit (using the SPD's definition on p39). The control of the maximum ridge height of buildings on AL1 and AL2 should be 10 metres AOD (road), whereas the maximum ridge height for the buildings at AL4 should be 7.5 metres to account for the rural locations – please note that the map on Page 33 of land to the north of the A43 fails to identify a further 6 farms in the vicinity. 9.5m is the precedent for the local area therefore 10m AOD would fit with the intent of the Local Plan (2) for small and medium sized units.</p> <p>3.17 – please add to “the road network is made up on single track country roads” ‘and is therefore unsuitable to accommodate increased traffic flow from nearby development’.</p> <p>3.18 Again, the SPD statement that the ability to provide development whose form and scale considers/reflects the rural character of this area through built or landscape elements will enable</p>		

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		<p>a more gradual and sensitive transition from North Towcester to the surrounding countryside is entirely appropriate. The SPD should place a much stronger emphasis on this key consideration and request that development of AL1 begins at the southern end (closest to the A43) and is built incrementally towards the hamlet of Caldecote.</p> <p>The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be more defined and specific – it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location. The existing development at Bell Plantation (Garden Centre) is a good example of aesthetic design and should be used as the design precedent for the application by DHL on the northern part of the AL1 site, as well as AL2 in order to provide a similarly attractive Northern Gateway. Please note maximum existing ridge height on the Bell Plantation Garden Centre section of the AL1 site is 6.5m (not 10m as per page 68).</p> <p>For clarity and the avoidance of doubt the SPD must split the AL1 site into two sections with two separate applications. One should not be allowed to piggy back on the other; they are separated by woodland and will have two separate entrances onto the A5. Each application shows very different intent for the land use and must be appraised and considered separately eg the DHL section is mostly monolithic large scale B8 warehousing, whereas the Bell Planation section is a</p>		

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		<p>broad mix. In addition (page 68 para 6.18) only the DHL section of site AL1 should include vehicular access to any sports pitches - it is not the responsibility or obligation of the southern site to provide any access.</p> <p>Page 66 6.2 – Fails to detail the existing dog kennels business at Brickyard Farm and that Bairstow's Lodge is an occupied domestic residence.</p> <p>Page 68 para 6.25 "Rising to approximately 16m" should be removed and replaced with 10m as the AOD height. 16m is far too high, exceeds the existing precedent and would lead to overbearance and negative visual impact on the sensitive receptors and wider area, it would also create an urban style corridor to the Northern Gateway.</p> <p>Towcester Northern Gateway</p> <p>Page 34 3.21 Please remove the final sentence 'if delivered sensitively and in line with policy this could see the delivery of some small sized buildings alongside medium and in exceptional circumstances, large development units' and replace with "This could see the delivery of some small and medium development units" in accordance with the LP 2 land allocation for "small and medium units". In addition the reference to large development to units is introducing a new planning policy and is therefore inadmissible as it would be contrary to the remit of an SPD (2.2).</p> <p>Equally this statement is in direct contradiction to the earlier narrative about the open and sensitive nature and characteristics of the areas surrounding AL1 and AL2.</p>		

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		<p>3.22 The Towcester Masterplan states that the northern gateway acts as a key arrival point into the historic settlement of Towcester. This needs to be reflected in the design quality, scale and massing of all the allocated land sites. The SPD should note that Silverstone, Whittlebury, Caldecote, Duncote, Greens Norton and Tiffield are also important historic settlements that deserve the same level of design quality, scale and massing considerations in relation to the development sites.</p> <p>Small, Medium and Large Unit Sizes – Page 38/39</p> <p>In order to “provide a robust and clear development framework” and to remedy the deficiencies of the Local Plan (2) this section is extremely important as it is key to define precisely what is meant by small, medium and large developments. There can be no ambiguity.</p> <p>The SPD’s definition of small units is correct at 250sqm to 2,500sqm but the definition of medium sized units should be between 2,500sqm and 5,000sqm (not 8,000sqm). The SPD cites Tove Valley Park and Silverstone Park as local examples of medium sized buildings. Again, Swan Valley is not relevant in terms of buildings appropriate in scale, form and character local to the rural Towcester area.</p> <p>Large buildings are defined as 8,000sqm to infinity – which is clearly unacceptable, and whilst inclusion of large buildings may be justified for academic comparison, this SPD must not support the possibility of development of any large buildings on AL1/2/4 as they are incongruous to the</p>		

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		<p>rurality of Towcester and would contravene the remit of an SPD by introducing a new planning policy.</p> <p>Given the intention and wording in the Local Plan (2) for 'small and medium sized units', then that is what should be built. The local precedent for 5,000 sqm should be the maximum acceptable footprint on any site, with no future amalgamations permitted to exceed these parameters. These footprint restrictions will automatically limit the heights of those buildings but for clarity, and the avoidance of doubt, the maximum AOD (road) building height for AL1 and AL2 should be 10m; and 7.5m for AL4. This will ensure that the visual impact is lessened to the local sensitive receptors. No new building to be taller than any existing building on a nearby site - ie for AL1 and AL2 this is site 4 (page 28 of the SPD) and for AL4 this is site 6/Silverstone Business Park/Shacks Barn (page 30 of the SPD).</p> <p>I wish to stress that the enormous building heights permitted for AL3 (Tiffield Lane) of 21.5 (27.5 AOD) must not be allowed to provide context or relevance to AL1/2/4.</p> <p>Landscape and Visual Consideration Page 43 to 55 The Sensitive Receptors, and in particular Viewpoints 1-15 for AL1 &amp; AL2 and Viewpoints 1-12 for AL4 demonstrate the profound impact inappropriate developments could have on Towcester and its surrounding rural areas. Why then have the planning applications submitted to date made no consideration of their negative visual impact? It is a perfect example</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>of developers 'trying it on' and thus far (AL3) being allowed to 'get away with it'.</p> <p>The SPD should make it a requirement that all applications include visual impact assessments based on the sensitive receptor/viewpoint locations as a minimum.</p> <p>Roadside buildings should be compatible with the heights of existing building on those roads to avoid visual overbearance.</p> <p>All existing boundary screening and vegetation must be retained and enhanced where necessary.</p> <p>Screening using trees must be large scale, not planted with the possibility of full screening only after 15 years and screening maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable and insufficient screening.</p> <p>Allocated Land Over-Development</p> <p>The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area. This is of particular importance for AL4, where the developer has already attempted to increase the development site area by 28% through placing the drainage ponds outside of the allocated land area.</p> <p>Ensuring that all planning mitigation and infrastructure associated with these developments is contained within the allocated land areas will prevent over-development of the sites and reduce the temptation to attempt further development on non-allocated neighbouring land.</p>		



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		<p>Overarching Design Principles</p> <p>5.1 Of course the SPD needs to offer a degree of flexibility in order to conform to the NPPF, however the SDP must ensure that prospective developers provide the very best quality of design rather than trundling out bog standard box designs with no regard to the existing nature of the area.</p> <p>5.3. The general design principles are welcome but need to be numbered and should include:-</p> <p>Point 2 – this fails to recognise that development platforms are determined almost entirely by the size of building, more particularly on a sloping site. Therefore an 8,000m2 building will require proportionately more cut and fill compared with a building half its size. As a consequence there is a far greater likelihood of a platform having to be built up from existing ground level, as that is more cost effective, thereby causing a much greater visual impact.</p> <p>Point 7 – using footpath, cycle and road networks to support and encourage sustainable travel to and around the site is completely appropriate. However, this fails to take into account that the type of use ie warehousing will have a major impact on the levels of sustainable travel.</p> <p>Distribution logistics/warehousing is likely to require a workforce to be sourced outside the Towcester area (evidenced by the local socio-economic profile - 2.29) which completely undermines the case for sustainable transport. It is also disappointing that the current AL1</p>		

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		<p>planning application fails to provide a quality cycle and pedestrian route from Caldecote to the site and then on to Towcester.</p> <p>Point 12 – the list of methods for limiting the impact on tranquillity of each site’s rural setting should also include operating times and limits to operations (e.g. refrigeration), especially since the prevailing wind in the UK is from the south-west so in the case of AL1 noise pollution is more likely to be carried to residential areas.</p> <p><b>TRAFFIC</b></p> <p>To date, the potential traffic problems from these developments have been ignored and dismissed. This problem is not going to disappear and therefore it is essential the SPD requires evidence of cumulative traffic impacts on the wider road network and key junctions/roundabouts as well as assessing the impact of increased traffic arising from the proposed development plus other contributory influences such as after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale SUE houses are completed, and once AL3 is operating.</p> <p>Much greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts (which have already received pinch point funding), the local road network and specifically through the villages of Greens Norton, Whittlebury, Silverstone and along Cowpastures Lane.</p> <p>The SPD needs to require that any planning application for any AL site must include a wide</p>		

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		<p>ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal.</p> <p>Site AL4</p> <p>6.60 The SPD should make reference to the site's poor south-bound access to the A43, requiring all south-bound traffic to and from the site to go through Silverstone village, which was dualled in 2002 specifically to remove heavy traffic from the village.</p> <p>6.65 The maximum development height for AL4 should be 7/7.5 meters, not the 10-15 metres referenced. This is due to the local topography and the site's position in open countryside on rising land away from it to Whittlebury in particular. There should also be more sensitive receptors for this site.</p> <p>The maximum unit footprint for the AL4 development, given the access difficulties and other constraints, should be the existing development (1200m<sup>2</sup>) and Silverstone Fields (2,500m<sup>2</sup>)</p> <p>6.66 No large buildings on this site for the reasons stated above.</p> <p>Thank you again for commissioning and producing the SPD, it is a step in the right direction after a truly disastrous interpretation of the Local Plan by some WNC Planners and Developers alike.</p> <p>The existing employment space in Towcester has gradually developed over the last 30 years; large-scale, high bay logistics hubs of the sort proposed by DHL for AL1 will be built and operational within 3 years. Therefore 30 years' worth of development in less than 3 years, which</p>		

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		<p>makes no sense at all. Of course land is required for employment, but an employment use befitting a small, rural market town - not a major town or city with all the immediate infrastructure to hand. Simply restricting building height to 10m AOD and building size to 5,000sqm will control the speed and take-up of the land and ensure the scale of development befits the town it serves.</p> <p>I wish to add the following comment to my response below.  Page 24 – Contextual Considerations reads Objective 3: “To facilitate tourism and leisure related growth creating a distinct offer within North Northamptonshire” – this should of course read  Objective 3: “To facilitate tourism and leisure related growth creating a distinct offer within South Northamptonshire” –please make this amendment and also include in the SDP that none of the developments AL1/2/3/4/5 should prejudice or hinder the delivery of tourism in South Northamptonshire, and specifically the programme of events at Silverstone race track</p>		
SPD22 5	G Phillips	<p>I would like to object to the proposed development of the above site on the following grounds:</p> <p>1. Impact on the highway network  The development is situated adjacent to the A508 single carriageway road and close to the Old Stratford roundabout. The A508 is already a busy road, particularly during peak periods, and traffic is likely to increase (HGVs/commercial vehicles particularly) once the rail freight terminal at J15 of the M1 is completed. The Old Stratford roundabout is already identified as a pinchpoint</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered</p>

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		<p>with the volume of traffic at peak periods from the A5 northbound from Milton Keynes, A5 southbound from Towcester, A422 and A508. Other proposed developments, if completed, in the Deanshanger and Towcester areas will only exacerbate this issue.</p> <p>At times when there are issues on the M1, the roundabout can become very congested, particularly with HGVs.</p> <p>The proposed access to the development is via a new roundabout between the Old Stratford roundabout and the first Cosgrove entry road (Northampton Road). Due to the short distance between the Old Stratford roundabout and the proposed new roundabout, this is very likely to result in tailbacks blocking the Old Stratford roundabout at busy periods. Construction of this access will also result in enormous disruption and inconvenience for Cosgrove residents and anyone else using the A508.</p> <p>If this proposed new roundabout does not go ahead, how will traffic safely access the development? The only access then would be via the narrow Northampton Road which would be quite unsuitable for the heavy traffic flow of goods/commercial vehicles which would be expected for the size of the development.</p> <p>2. Impact on local residents</p> <p>The proposed development will unfavourably impact the residents of Cosgrove and particularly the residents of Stratford Road. The size of the proposed warehousing/offices will dwarf the</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p>	<p>as part of the planning application process.</p>

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		<p>adjacent properties and, with proposed 24-hour operation, will result in considerable disturbance from noise and light pollution. It will completely change the character of this rural area, causing loss of habitat and destruction of trees as well as loss of residential amenity.</p> <p>It is noted that an area of the development adjacent to the A5 dual carriageway is proposed to be set aside for a country park – what use is this to the residents of Cosgrove? It would be better situated opposite the residential properties in Stratford Road.</p> <p>3. Need for this development There are already many warehouse developments in progress in Milton Keynes, notably one large one at the further end of the A5 dual carriageway, one at Towcester and the rail freight depot at M1 J15. Is there a requirement for a further development here?</p>		
SPD22 7	C Askew		Issue with redacting doc	
SPD22 8	Blisworth Parish Council	<p>Response to consultation on South Northamptonshire Local Plan Part 2, Employment Allocations. Supplementary Planning Document</p> <p>Blisworth Parish Council have discussed the application at public meetings on 1 August 2022 and wish to submit the following representation in response to the public consultation. Blisworth Parish Council is open and supportive of providing areas of the county for development for employment, however we believe that this needs to be complementary to rural villages and should not cause material harm. We have concerns surrounding proposed increases in industrial development</p>	<p>APPX 1 not copied over - photos to support document</p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the</p>

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		<p>density south of Northampton, surrounding Towcester and east of Old Stratford.</p> <p>We would like to make the following points for consideration:</p> <p>1. We have found that there is a significant increase in the number of proposals to provide warehousing in South Northamptonshire which primarily attracts low skilled workers to the region. Could there be an aim to bring other forms of employment to the region beyond warehousing and distribution and encourage other forms of employment for the locality. As South Northamptonshire currently has low unemployment levels, we believe that this would build local skills and capability in our communities for the future. We have seen increasing numbers of large developments of warehousing and distribution facilities which have limited economic benefit to our communities. We would like the local plan to develop industries beyond the low skilled roles in distribution and encourage the development of local talent in partnership with our Schools, colleges, and universities. This in turn would inspire school leavers and young people to settle within the county rather than look beyond our boundaries for higher skilled employment. We find currently that workers are travelling from beyond the county, in cars, thereby increasing the traffic issues this style of development attracts. We believe that the current focus on distribution facilities is significantly increasing HGV traffic movements across the county.</p> <p>2. Often these facilities are of scale which is not appropriate to protecting the rural landscape often with proposed units exceeding 18m high. This proposal aims to limit future development to 16m, but the widespread opinion is that this is too high and should be limited to 12m as to not impact the rural views across South Northamptonshire. Often these larger scale developments are significantly altering the landscape and views across the county</p>	<p>out commuting as well as to help provide for local employment. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>countryside particularly along the transport corridors of the M1, A43 and A45.</p> <p>3. Blisworth like many of the county's villages is a rural settlement of approx. 1000 buildings largely comprising a conservation area with several prominent listed buildings, of which many are situated alongside the primary routes that traffic uses to access these development areas. The protection of Blisworth's rural, visual, historic, and archaeological qualities is supported by Local Plan. It was recognised by the Highways Authority and Northamptonshire County Council in 1995 that the village was unsuitable for HGV traffic when the village was bypassed creating the A43. We have found that increasing developments south of Northampton, surrounding Towcester and east of Old Stratford force traffic to use the rural road network as "cut throughs", particularly where major trunk roads are congested or blocked. Any proposal must consider the cumulative effect on the rural road network and the fact that the junctions and routes are unsuited to HGV traffic (Appendix A)</p> <p>4. Blisworth, as with other smaller Parishes is blighted with traffic using the village as a cut through from Northampton and Milton Keynes to the A43/M1 and A508. This issue has been identified as one of the Policing Regional team's strategic priorities. We have seen significant increasing traffic movements and lack of compliance with speed limits through the village despite investment, and this causes issues as footpaths are close to and not protected from the traffic in the highway. There are many restrictions on the rural highway that cause hazards for example, the rail bridge on the Northampton Road outside Blisworth brings cycle and pedestrian traffic adjacent to the highway and represents a significant hazard. At present there are c5000 traffic movements every day through</p>	<p>Any requirements for highway mitigation will need to be meet the S106 tests at a planning application stage.</p>	



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		<p>the centre of our village and this continues to grow, equating to c1.8 million journeys over an annual period.</p> <p>5. West Northamptonshire Council have installed traffic signage routing HGV traffic away from the route through Blisworth and Milson Manor at the Mereway roundabout in Northampton as an active control policy. These signs are hidden in the clutter of the street signage and are fairly ineffective at preventing HGV traffic using the route through Hunsbury, Milton Malsor and Blisworth to connect with the A43. The purpose of directing traffic along the trunk roads and not through the rural road network is to protect heritage and listed buildings adjacent the highway in Blisworth and for residents using local facilities such as the village shop, Primary School and public house. We believe that the local plan needs to take account of improvements at critical junctions to direct traffic along the major trunk roads and not through the rural road network.</p> <p>6. Any development proposals require adequate cycle, pedestrian, and bus access to the site for workers. Often, we have seen developments proposed which prevent access to the site by cycle due to the absence of cycle ways beyond the immediate development; and a limited bus services only operates between 0800 and 1800 at two hourly intervals and would therefore be unsuitable for many of the proposed employees utilising these proposed locations. The footpaths are also narrow and poorly lit from rural locations. As our county has low unemployment levels. We therefore believe that a) any development would have limited economic benefit to the villages and b) that workers would travel from further afield, in cars, thereby increasing the traffic issues already identified.</p> <p>7. Often WNC considers any application in isolation and misses the context of the many other developments underway or planned in the area which will impact rural communities. We consider that it is essential that the cumulative impact is</p>		

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		<p>considered alongside the expansion in housing and industrial use South of Northampton Town and North of Towcester by the Council when considering individual proposals.</p> <p>We would also raise a strong concern around the ongoing practice of developers gaining permission and subsequently applying for alterations to the application. We are concerned that any agreement to develop these identified areas could be subject to future expansion and the resulting traffic impact. If WNC are minded in considering individual applications to develop the areas identified in the Local Plan there would need to be significant investment in the highways infrastructure locally including footpaths using instruments such as the former 106 agreement/CIL levies. As I am sure you agree there would undoubtedly be a significant need to upgrade and improve all the local roads, junctions, signage and pedestrian and cycle networks throughout the rural network to support this proposed local plan.</p>		
SPD229	J Brearley Jennifer Lampert Associates		Unable to copy and paste from email	
SPD230	Rt Hon Andrea Leadsom	<p>I write in my capacity as Member of Parliament for South Northamptonshire in response to this consultation and on behalf of my constituents who have expressed their serious concerns to me about the future of the town.</p> <p>I hear with increasing frequency from constituents who are deeply apprehensive about the existing capacity of the road network, the scale of development sites already identified as part of the Local Plan Part 2, and the number of planning applications, notably AL1, AL2, AL4 and AL5 that are the subject of the SPD.</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the</p>

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		<p>Combined with AL3, which received approval earlier this year, these existing development proposals will negatively affect the character of Towcester while simultaneously increasing traffic on local roads as well as the major roads network. It is important that the SPD considers the following:</p> <p>Air quality: The A5, particularly Watling Street, is constantly at a standstill with traffic. Air quality is poor, and residents have been advised by West Northamptonshire Council to keep their windows closed for their own health. What practical measures does the local authority have in place to tackle this problem and will these form part of the SPD and requirements for future planning applications?</p> <p>Traffic: traffic modelling is not consistent and a cumulative traffic assessment should be undertaken to cover all of the AL sites. The Towcester Relief Road is in its construction phase and this vital piece of infrastructure was designed to help to relieve longstanding issues for residents. Whilst Persimmon are committed to delivering the relief road by spring 2023, this road is not designed to enable future development to the south of the area. I am continuing to pursue restrictions on HGVs through the centre of Towcester with local representatives and National Highways. Continued use of the A5 Watling Street by these vehicles would cause detrimental, irreversible damage to our area and should be considered as part of the future development viability for the south of Towcester.</p> <p>Employment: detailed information should be provided by developers as to the economic and social</p>	<p>highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including contributions</p>	<p>application stage will need to be undertaken to best shape a proposal for each site. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants</p>

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		<p>benefits that employment opportunities from their development would bring to the local area as well as the specific type of employment (skilled or semi skilled) that is on offer. It is not desirable to have large additional numbers of warehousing roles in an area with close to full employment as it will necessitate further inward commuting from significant distances.</p> <p>Height and appearance of units: The SPD provides definitions for a small, medium or large building size unit, with small ranging in size at 250m<sup>2</sup> to 2,500m<sup>2</sup>, medium between 2,500m<sup>2</sup> to 8,000m<sup>2</sup> and large with a minimal footprint of 8,000m<sup>2</sup>. The SPD should have stronger guidance in place, with specific height and footprints restrictions issued, particularly for large units. No building should be visible above tree lines or over the height of any existing buildings in the vicinity and tree screening should be used to minimise the appearance of new buildings. The local authority should be clearer about what type of screening is used and provide greater detail on the landscaping that is acceptable.</p> <p>I echo the comments made in the submission by the residents of Slapton and Save Towcester Now whereby no new building on any of these sites should have a footprint that is greater than 5,000 square metres.</p> <p>Local, historic surroundings: any new developments should respect and enhance the local environment, particularly the historic nature of Towcester and its surrounding villages.</p>	<p>to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of pedestrian cycling and walking links between the site and Towcester town.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	<p>towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. Additional wording has been added regarding AL3 to set out that</p>

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		<p>Active travel: the opportunities and benefits of active travel provision (cycling, walking) should also be considered as part of the plan as well as what financial provision the local authority has for specific and wider projects.</p> <p>As I have reiterated in previous correspondence, these applications will continue to exert pressure on our local area and its essential infrastructure, making it more important than ever that the Farthinghoe Bypass and the northern Northampton ring road are expedited, with funding options explored and obtained as a priority action by West Northamptonshire Council.</p> <p>Concerns over planning and the future of Towcester is the top local issue that constituents write to me about. The volume of cases has increased in recent years as residents become even more concerned about the development of the local area, and the impact continued construction will have on businesses, health, wellbeing and way of life. I fully support my constituents in their calls for action to be taken to protect our local area, and to ensure that South Northamptonshire can be an attractive place to both live and work.</p> <p>In summary, whilst I welcome the SPD and the chance to share the views of my constituents and myself, I would like to reiterate that a thorough review of the road and transport infrastructure needs to take place. Any further developments in our area will require improvements to major roads to be carried out in advance.</p>		<p>alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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SPD23 1	Deanshanger Parish Council	<p>The South Northants Local Plan Part 2 intended that the employment sites allocated within it were for small to medium sized units providing small scale employment opportunities. This was explicitly stated throughout the plan itself and in its foreword. Having set out the aims and objectives of the employment allocations in the South Northants Local Plan West Northants Council is now consulting on an additional Supplementary Planning Document (SPD) to give greater clarity to what it would like to see developed at these sites. We feel that the intention of the Local Plan should be honoured in full and that only small and medium sized operations that deliver the stated aims of the plan (13.1.5 below) should be permitted. This should not be watered down in any way through this SPD and instead needs to be tightened.</p> <p>It is unclear to us why national/international companies (B8) have come forward with plans for such large-scale warehousing and distribution on the allocated sites as these proposals are not compliant with the stated aims of the SN Local Plan Part 2. If this SPD can close any 'gaps' in the Local Plan Part 2 that would allow such mega enterprises into these allocated sites this would be welcomed.</p> <p>While it is clear that West Northants is a strategically well-placed county for the logistics industry and that the larger logistics/distribution companies want to build large operations here, the stated aims of the SN Local Plan are clear that this is not appropriate. This SPD needs to confirm and reiterate the stated intention of the SN Local Plan which is to:</p> <p>13.1.5</p> <ul style="list-style-type: none"> <li>• Meet local demand and strengthen the rural economy;</li> <li>• Provide the ability to strengthen local supply chains;</li> <li>• Local flexibility and choice of locations;</li> <li>• Meet the demand for small and medium sized units and</li> <li>• Contribute to reducing the level of out commute.</li> </ul>	<p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment. AL3 is not included within the scope of the SPD as it already benefits from planning permission. The SPD could be reviewed however if necessary.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>This SPD has been informed by a combination of desk-based assessments and site visits, taking</p>	<p>The wording 'in part' has been removed. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised</p>

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		<p>The Planning Policy Team West Northamptonshire Council The Forum Moat Lane Towcester NN12 6AD Localplanconsultation.snc@westnorthants.gov.uk</p> <p>Indeed, should large scale, global operations (B8) be permitted, this will:</p> <ul style="list-style-type: none"> <li>• Drive out the very small and medium sized companies that the Plan was designed to encourage. Costs of units will be pushed out of the reach of small and medium enterprises.</li> <li>• Lead to major issues for the local population with traffic issues bringing chaos to already grid locked areas such as around Towcester and the A5 Old Stratford roundabout.</li> <li>• See workers bussed in for these organisations instead of supplying much needed work for the local population. The low paid, low skilled workforce needed for many of the operations of large-scale warehousing and distribution do not match the skill sets and needs of the local population and we will continue to see commuting out of the area while workers for mega warehouses are being bussed-in.</li> </ul> <p>Clarity of Part 2 Aims The draft SPD at page 24 states para 3.2 that the role of the employment sites was in part to strengthen the local economy etc. The 'in part' addition is unwelcome. This is too loose and should be tightened to reflect the aims of the SN Local Plan Part 2.</p> <p>AL3 should be included in the SPD This SPD as proposed will NOT cover AL3. It is proposed just to be applicable to AL1 (Bell Plantation / DHL site), AL2 – Woolgrowers (Services hub site), AL3 – (IM Properties site), AL4 – Shack Barns (Podium Developments site) and AL5 –</p>	<p>into account a wide range of key considerations and site contextual information including the proximity of residential properties in neighbouring villages.</p>	<p>planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>Furtho Pit (Frontier Site). The stated reason is that AL3 has a permission granted and an SDP cannot apply retrospectively. This may be the case, but the SPD should cover any future development on AL3 not covered by the existing permission. This would future proof the site should the current permission not be progressed and cover any further developments that may take place in years to come. Future permissions or applications for any changes or expansion, should be within the scope of the SPD and its guidance followed.</p> <p>Definition of Unit Size – Put a Limit on Large Definition  The SPD provides definitions of unit size a small unit, up to 2,500 m2 medium size unit, from 2,500 m2 to 8,000 m2 and then large being greater than 8,000 m2. This is useful but does not limit the size of what constitutes large. The SN Local Plan states the need for small and medium business units, and we continue to expect the WNC to ensure that this is delivered for the local area. However, in other parts of WN, including around motorway junctions, having no upper limit for large could mean that massive units come through where this does not meet local needs. An upper limit should be further clarified/defined for large and a fourth category for perhaps 15,000 + (Mega/Giant/Super) would be usefully introduced. It should also be stated that no units in the large (unless in exceptional circumstances) or this fourth category would be permitted at any of these SN allocated AL sites.</p> <p>Design  The factors included in the SPD are important, but the height of permitted units needs to also be included. The building should be no taller than any existing building in proximity to the site and the SPD should set out that if using treelines etc to set heights that bunds with tree planting on top is not an acceptable way to make a ridge height acceptable in planning terms.</p>		



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		<p>Keeping Services On-Site – No ‘Creep’ of Site Size  The SPD should make clear that all services and attenuation for example rainwater balancing ponds must be kept on site and within the allocation area. The council should not allow the sites to gradually creep in size by allowing some of these services to be adjacent to the allocated SN AL sites.</p> <p>Future Development – Prevent Units Amalgamating to become Very Large (Mega/Giant/Super)  The guidance should be clear enough to prevent small and medium buildings from being joined up to make large and very large units in the future. The SPD makes it clear that small and medium are wanted and large only in exceptional circumstances. If we adopt proposals to have a fourth category for very large units and extend the SPD to exclude very large units even through future amalgamation, we can prevent the amalgamation of units to create very large units in the future.</p> <p>Site Size limit for single buildings  The SPD should say that no one single building, including parking etc, can take up more than an agreed % of the total AL site space. A real mix is needed to deliver the desired outcomes as detailed in the SN Local Plan. A suggested maximum of 15% of the total space as allocated in the Local Plan would seem appropriate. This will continue to keep the focus on the small and medium size and provide the desired mix.</p> <p>Traffic and Traffic Surveys  The SPD does not give suitably robust guidance on the traffic issues that many of these AL sites could give rise to. We accept that any planning application must be accompanied with appropriate traffic survey and mitigation proposals, nonetheless specific guidance would be welcome. Many residents are greatly concerned about the traffic impact with some of the proposals that have been submitted.</p>		

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		<p>The cumulative impact of these, especially along the A43 and A5 (A422) and A508 needs to be addressed as there are a number of existing traffic pinch points that will be further exacerbated. As such, we would like SPD guidance that the council expects to see that a traffic survey will include the have impact from all these AL sites on the other one(s).</p> <p>In addition guidance as to the scope and how wide any traffic survey should be, would be welcome. For example nearby, along the A5 at Fenny Stratford there is currently under construction 2m sq. ft of warehouses. Some of this traffic will use the same stretch of the A5 as would be required for access to the AL5 Site. This needs to be included as the A5 Old Stratford roundabout and along the A422 and A508 is already subject to frequent tailbacks.</p> <p>We would also need to have some reference to the times when the A5 and A508 serve as the alternative routes to the M1. This is becoming a more frequent occurrence with incidents almost weekly.</p> <p>Traffic routes to the AL sites is already extremely heavy and subject to frequent congestion and tailbacks. As such guidance on how workers will reach these sites is very important and the integration of public transport must be a pre-requisite to any application. This should include routes that bring workers from rural areas and villages and not just the towns. For example Deanshanger and nearby villages have no buses that link with Towcester and so bus routes from the villages must be in place. This should be specified in the SPD – integrated public transport that allows workforce from surrounding villagers to get to the site and not have to rely on cars.</p> <p>AL5 Impact on Residential Properties – Stratford Road Stratford Road has a row of homes that overlook the northern edge of AL5. This is acknowledged in the SPD and mentions that it needs to be managed sensitively. The SPD should give</p>		

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		<p>some guidance that 24-hour working, noise pollution or other polluting operations along the road will not be permitted. The type of conditions that the council would be seeking would give clarity to both residents and the developers. It may be more for the planning application to set out and add conditions as to hours of use, light, odour and noise pollutions but the SPD can make it clear the minimum expectations.</p> <p>We trust that these comments and recommendations will be taken into account for the final draft of the SPD. We also request that we are kept up to date with each development as this SDP progresses to adoption.</p>		
SPD23 2	C Neale	<p><b>TRAFFIC AND IMPACT</b></p> <p>1. A cumulative TRAFFIC study and assessment must be carried out to cover for ALL the sites - AL1-4. We know how congested the Tove/Abthorpe roundabouts become, as well as the centre of Towcester, and that our villages are impacted significantly by this. We need full traffic analysis that assesses over all day and all week as the traffic levels can change and be very high as impacted by flows elsewhere including the M1 and M40. A full traffic impact assessment is required to include an assessment of the potential percentage increase of traffic on A5 and through Towcester and how it would impact on the new relief road and the existing and proposed junctions/roundabouts. There should be assessment of the impact of increased traffic on the health and wellbeing and sustainability of our communities. In the Local Plan introduction on page 16 of there is considerable emphasis placed on the</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>importance of the A5 and A43 roundabout and the Abthorpe roundabout. The developments proposed (AL1 and AL2) will impact negatively on the already heavy traffic and effectiveness of the roundabouts. It is not just the potential volume and timing, it is the fact that it is at a roundabout junction which is already very critical to flows of traffic in the area.</p> <p>Traffic on the A5, through the town and the A43 already has considerable impact on the accessibility in and around the town in all directions which is important to the economic activity of the area, but already a pressure on the sustainability of the economic activity in the town itself.</p> <p>Has there been any consideration of the impact on the air quality management area in the SPD.</p> <p>Whilst the area is in the town centre and the relief road is intended to help this, the proposed development will add traffic and therefore will have an impact on the A5 through the town? Has this been assessed ?</p> <p>What consideration has been given to the potential role of traffic volume restrictions in the SPD ?</p> <p>2.SIZE AND SCALE IMPACT FOOTPRINTS FOR MEDIUM UNITS 5,000m2AND NO LARGE UNITS.</p> <p>The original Local Plan was intended for small and medium sized units. It should be that no building exceeds 5,000m2, which is the precedent for this area. For comparison the largest units</p>	<p>The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p>	

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		<p>at Silverstone Circuit are 5,000m2. The SPD suggests that units over 8,000 m2 could be built on all the sites "in exceptional circumstances". This option needs to be removed.</p> <p>The size and proportion of AL1 in relation to the town of Towcester will have a significant negative impact on the visual amenity of the town and surrounding area . The SPD must address this. The Local Plan referred to small scale employment opportunities.</p> <p>It will have a very significant detrimental impact on the heritage of the historic town, the approaches, the views from within and emerging from the town will change the character of the Town. The heritage of Towcester is the essence of the town, it is the oldest town in Northamptonshire. A development of this proposed size and height will irrevocably negatively change the town.</p> <p>P 17 para 2.1.17 of the Local Plan refers to the specific importance of the developments appropriately placed at J16, 15 and 15a. These should be required to be considered, they are more appropriate places for the proposed development for strategically placed employment without the significant negative impact on the heritage of the town, local communities, visual amenity, the ecology, environment and sustainability.</p> <p><b>3. HEIGHTS AND IMPACT – KEEP THE RIDGE HEIGHTS FOR ANY BUILDING UNDER 10M.</b></p> <p>The SPD allows for buildings on AL1 "rising to 16m" – which is too high. AL2's buildings up to</p>	<p>Any harm would need to be outweighed by benefits.</p>	

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		<p>12m in height and on AL4's up to 15m high. All these are much taller than any other existing building in the area. They will have a very negative visual impact on our area and the heritage of the town. There should be a 10m high restriction.</p>		
SPD233	P Pankhurst	<p>We have been shown the link to the proposed developments for the above. I am e-mailing as the Manager of the Quarries Scout Active Support Unit at The Quarries Scout Campsite, Stratford Road, Cosgrove MK19 7BD Milton Keynes Scout District own The Quarries Scout Campsite, Stratford Road, Cosgrove MK19 7BD and have done so for 98 years, we are self funding and receive no grant from other sources besides what we charge for usage and any charitable requests we make for works on site. The site originally catered for local scouting in Stony Stratford and Wolverton but over the years the site and its usage has developed at Milton Keynes and its surround areas did. The Scout District now caters for Scouting throughout MK - to Stewkley/Newton Blossomville, across to Stony Stratford, Hanslope, Olney and back towards the M1 and across to Broughton and across the Western flank. This is 23 groups and Explorers and Scout Network Units ages ranging from 8 - 25. The site is now used by our local Groups in Milton Keynes (we have a membership of over 1500 and growing) all year round for evening activities as well as other Scout District in Northamptonshire.</p>	<p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include any impact on the Scout Campsite.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Future planning applications will need to be supported by appropriate</p>	No changes necessary.

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		<p>We also cater for schools for their Duke of Edinburgh Award expeditions and other youth organisations be it residential (we are currently drawing up plans to replace our residential building before going to planning permission) or camping. We also welcome International scouts and other charity organisations or private companies for team building days.</p> <p>All arrive either by car, bus or on foot. Walkers come in via the Public Footpaths around the area and they also leave this way as well. Day trips to the canal are sometimes planned by people on site and they cross the road and enter the public footpath further down Stratford Road,</p> <p>The site sometimes has 170 plus campers for a weekend all arrive by car and dropped off or mini buses. Some arrive by coach which has happened recently and 120 plus campers arrived in two coaches from inner City London. We are welcoming the British contingent of Boy Scouts of America by car and coach later in the year approx 170.</p> <p>All use the roads in and out of Cosgrove, be it through Castlethorpe and through Cosgrove or down the A5 to the roundabout and turning off to the A508 and then into Cosgrove to the site. At times we have to ensure that we have site crew on traffic duty, ensuring the smooth flow into the site as well as the traffic coming along Stratford Road.</p> <p>We encourage wildlife, squirrels abound, foxes are seen on wildlife cameras and birds nest</p>	<p>ecological surveys and associated mitigation strategies.</p>	

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		<p>in boxes and from the Quarries to the proposed development. We want to ensure that this area is preserved for the wildlife and have recently introduced an environmental area on the site.</p> <p>All of the development may have an impact on the site and its use, will it be seen as they come to view the site as being in the middle of a concrete jungle and not out in the countryside as it was originally when the air pollution is not as what it was by previous users or new ones.</p> <p>We work with our neighbours to ensure we live in harmony, some are elderly and we ensure that any major events are notified to them. None of this would be possible without us all working together and we want to ensure that the quality of life that we have continues.</p>		
SPD23 4	J Hamer	<p>S/2020/2337/MAO</p> <p>My main objection to the proposed development is the increase in traffic, particularly HGVs, on the A413. Since the bypass was built there has been an increase in residential building and more people crossing the road to access village services including the school.</p> <p>Any future development should include new slip roads on to the A43.</p> <p>I am also concerned about the size of the units - both height and area. Small and medium units would allow for a greater variety of businesses and more scope for employment from</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning</p>



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		<p>the local area. The height of the units should also be limited so they can be screened by planting and are not obtrusive in the landscape. Light pollution should also be considered.</p> <p>Any building should not exceed the size of the current units built on the land opposite the Silverstone circuit.</p>	<p>safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>application process.</p>
SPD23 5	A Young on behalf of Slapton Residents	<p>1. This letter is being sent to WNC on behalf of residents of Slapton as a response to the draft Employment Site Allocations Development Brief Supplementary Planning Document (SPD) dated July 2022, which invited responses in paragraph 1.13 of the document by today.</p> <p>2. The SPD notes that new planning policies cannot be introduced via a SPD and that it can only provide guidance as to the application of existing planning policies to the future development of four of the five employment allocation sites already identified as AL1, AL2, AL4 and AL5 in the Part 2 Local Plan adopted in July 2020. The report also notes in paragraph 1.10 that the SPD has been prepared without any pre-determination of the planning applications which are pending in respect of these four sites.</p> <p>(1) Proposed height and size of buildings in identified development sites</p> <p>3. The role of the five employment sites, AL1-AL5, is set out in paragraph 13.1.5 of the Part 2 Local Plan in 5 bullet points, the most important being:</p> <p>(1) to meet local demand and strengthen the rural economy;</p> <p>(2) to meet the demand for small and medium sized businesses;</p> <p>(3) to contribute to reducing the level of out commuting.</p> <p>As recorded in paragraph 1.7 of the SPD report, the sites were also identified 'to facilitate some additional small scale</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that</p>

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		<p>employment opportunities for the growing population associated with the strategic development site to the south of the town.' Paragraph 13.2.2 of the Part 2 Local Plan explained that '(sites AL1, AL2 and AL3) offer suitable locations for a range of new small and medium sized business units' and paragraph 13.2.3 further explained that the AL1 site 'represents an appropriate location for the provision of additional small and medium sized commercial buildings.'</p> <p>4. It is noted that nowhere in the Part 2 Local Plan does the plan raise the possibility that any of these sites would be a suitable location for a large business unit, however defined.</p> <p>5. It appears that the Part 2 Local Plan did not define what was meant by 'small and medium sized commercial buildings', but in its first bullet point summarising the overarching design principles that the authors of the SPD report themselves recommend to guide decision making in relation to planning applications for the sites in question, the SPD report states that any new development for sites AL1, AL2, AL4 and AL5 should 'support Local Plan policy to deliver high quality development that is respectful of its surroundings.' (emphasis added)</p> <p>2</p> <p>6. Applying that principle, Slapton residents support the proposals made by Save Towcester Now, Cllr Charles Manners and others in their written submissions to WNC on this issue, namely:</p> <p>(1) that no new building should be permitted on any of these sites which is taller than any existing building on a nearby site, which means that the ridge height of any new permitted development should be no more than 10 metres above ground level;</p> <p>(2) that no new building on any of these sites should have a footprint that is greater than 5,000 sq. metres.</p>	<p>out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This includes on villages such as Slapton where appropriate.</p>	<p>alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>7. The SPD report has introduced for the first time under the heading of Contextual Considerations the possibility of granting planning permission for the AL1-AL5 sites not only for small and medium sized buildings but also for large buildings. The report then proceeds to offer a definition for these three categories of building. The SPD report defines medium sized buildings as having a footprint of between 2,500 sq. metres and 8,000 sq. metres and large buildings as having a footprint of at least 8,000 sq. metres with no maximum figure. However, there is no large building within this definition anywhere in the Towcester area: the only buildings of this size cited in the report are in the large scan Swan Valley industry/distribution estate alongside the M1 near Northampton, which it is not accepted is in any respect a suitable comparator to the small and medium sized developments envisaged for these sites by the Part 2 Local Plan. Moreover, the maximum footprint of any present building on the Tove Valley Business Park and the Silverstone Park development, which are the only appropriate comparators for the AL1-AL5 sites, is 5,000 sq. metres, so this is a more suitable figure to adopt as the maximum footprint for a medium sized building.</p> <p>8. Having introduced the new category of large buildings and expanded the definition of medium sized buildings, the SPD report then recommends, under the heading of Building Height, Scale and Massing, that medium sized buildings should be acceptable up to a height of 16 metres and that there should be a presumption that large buildings should be granted planning permission 'in exceptional circumstances', which are wholly undefined, except that they should be of high design quality and should be accompanied by a thorough programme of landscape measures. The report contains no reasoned justification for these proposed amendments to the existing guidelines set out in the Part 2 Local Plan. Therefore, Slapton</p>		

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		<p>residents strongly urge WNC to reject this unjustified introduction of what amounts to a new, or at the very least a radically altered, planning policy via the SPD.</p> <p>9. The stated purpose of the SPD report (at paragraph 8.3) is to reduce uncertainty and set out clear guidance as to what is expected from development proposals, but it is submitted that, by introducing the express possibility of planning permission being granted for large build-ings on these sites without any limit on their maximum size and by expanding the definition of a medium sized building, the report is increasing uncertainty and encouraging unsuitable applications, like the pending application of DHL for the AL1 site, which involves a build-ing which is more than 18 metres high and has a footprint in excess of 110,000 sq. metres. WNC would still have a residual discretion to allow a planning application that fell outside its stated guidelines, if the SPD report was amended to delete all references to large build-ings and to redefine medium sized buildings for the purposes of these guidelines as having a footprint of no more than 5,000 sq. metres and Slapton residents strongly recommend that these amendments should be made to the draft report before it is finalised.</p> <p>3</p> <p>(2) Traffic implications of possible development of identified sites</p> <p>10. The SPD does not address the traffic implications of any of the four developments which are the subject of the report. In fact, the only mention of traffic implications is in paragraph 1.21 of the report, which concedes that it is important to take into account the cumulative impact of other approved developments when considering any planning application for AL1, AL2, AL4 or AL5 and suggests that, at the decision-making stage, the developer may be required to carry out a traffic impact assessment.</p>		

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		<p>11. Slapton residents believe that this guidance is wholly inadequate, given the fact that local roads and in particular both the A5 and A43 are regularly very heavily congested as a result of present traffic volumes, without the added impact of any further development in the Towcester area. The pending DHL planning application for site AL1 includes a transport assessment which predicts that the development will generate 465 arrivals and departures of commercial vehicles in the 7am-9am rush hour and 355 more arrivals and departures of commercial vehicles in the 4pm-6pm rush hour. This could well be an underestimate and also does not predict traffic movements either between 9am and 4pm or outside normal working hours. If traffic movements in the 4 hours of rush hour are estimated by the applicants to be likely to generate 820 movements of commercial vehicles, traffic movements over a 24 hour period could amount to more than 2,000, or even 3,000 if they continue outside normal working hours. This would have a major adverse effect on traffic movements throughout the Towcester area which will be to the serious detriment of all local residents.</p> <p>12. Residents of South Northants already have to cope with a very heavily overburdened road network, with the A43 bypass being regularly reduced to a stationary or very slow moving traffic jam and the A5 Watling Street also being heavily congested especially when the M1 is closed or traffic is diverted from the motorway. In these circumstances, Slapton residents feel very strongly that the traffic implications of any new proposed development in or near Towcester should be a very important factor in deciding whether or not to grant planning permission and that any development that is likely to generate additional traffic movements comparable to those of the DHL pending application should be refused planning consent on that ground alone, on the basis that the existing road network does</p>		

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		<p>not have the capacity to handle the additional traffic that would result from such development.</p> <p>13. It is possible that it will be argued that developments involving smaller enterprises will generate as much additional traffic as a single large warehouse development, but there is no evidence that this would be the case in Towcester and in any event traffic movements have been greatly altered by the experience of the pandemic, which has led to far fewer face-to-face meetings and much greater use of remote communications and present indications are that this will continue to be the pattern for the foreseeable future.</p> <p>14. Given the importance of the extent of additional road traffic generated by any proposed new development, the SPD should require any application to include details of the estimated traffic movements likely to be created by the new development and should give details of WNC's suggested maximum figures for new traffic generation and as well as conditions likely to be imposed on use of the site, for example a ban or restriction on 24 hour working.</p> <p>15. It was apparently suggested at a public meeting called to discuss the SPD report that traffic concerns are not relevant in assessing sites allocated for development or specific planning applications. It is thought that this must be a reference to paragraph 111 of the National Planning Policy Framework ('NPPF'), which states that development should only be refused on highway grounds if the impact on the road network would be severe, but the impact on the road network would in this case be extremely severe, if planning guidance allowed a large building, especially a national distribution centre, to be built on the AL1 site.</p> <p>(3) Effect of SPD report guidelines in preventing other more suitable development</p>		

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		<p>16. One of the stated aims of the Part 2 Local Plan is to offer suitable locations for a range of new small and medium sized business units, but this aim is likely to be frustrated if a single large company is allowed to develop the whole of site AL1 (or any of the other sites). Such a development would also undermine the aim of meeting the local demand for employment of a highly skilled nature, because warehouse employment would be predominately low skill. In addition, the Swan Valley distribution estate is a far more suitable place for the sit-ing of large scale developments of national importance, both because of its position and be-cause of the other facilities available at Swan Valley.</p> <p>Other factors</p> <p>17. It is noted by Slapton residents that Save Towcester Now has a following of 980 residents and that 3,950 people have signed its petition opposing large scale development on all these sites. So far as is known, there is no significant support amongst local residents for the type of large scale development proposed by the DHL application which it is submitted would be encouraged by the SPD report in its current unamended form.</p> <p>18. Slapton residents also support the comments and proposals for amendment of the SPD re-port contained in the Save Towcester Now email of 8th August 2022, the letter dated 14th August 2022 by Cllr Charles Manners, the email dated 17th August 2022 by James Miller and the letter dated 18th August 2022 by Andrea Leadsom M.P.</p> <p>Conclusion</p> <p>19. Slapton residents urge the WNC to adopt the proposals summarised in paragraph 6 above as supported by Save Towcester Now and others in relation to the employment allocation sites, AL1 to AL5, namely to limit planning consent on these sites to new buildings that are not more than 10 metres in height and have a footprint of not more than 5,000 sq.</p>		

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		metres. The WNC is also encouraged to invite the authors of the SPD report to amend it so that it omits all references to large buildings and redefines medium sized buildings as those which have a footprint of not more than 5,000 sq. metres.		
SPD23 6	Frampton Planning Frontier Estates	<p>1.1 This submission is made on behalf of Frontier Estates to the draft Employment Sites Allocations Development Brief Supplementary Planning Document. Frontier Estates control employment allocation AL5 land at the former Furtho Pit, Old Stratford/Cosgrove and have recently submitted a full planning application for its development by: '9 no. employment units comprising circa 69,744 sq.m./750,714 sq.ft. (GIA) of floorspace within Class B2 or B8 uses of the Town and Country Planning Use Classes Order 1987, with ancillary Class E(g)(i) offices and E(g)(ii) research and development, together with a Country Park, ground re-profiling in the Country Park, new vehicular access from the A508 and associated site infrastructure including lorry parking.'</p> <p>1.2 The proposed development satisfies the requirements of Policy AL5.</p> <p>2.0 SUBMISSIONS Draft SPD</p> <p>2.1 Paragraph 1.12 of the draft SPD states that the purpose of the SPD is to: 'To improve the planning and development process by reducing uncertainty and providing landowners, developers and the wider community with clear guidance on what is expected from future developments;'</p> <p>Response</p> <p>2.2 It is maintained that the existing policies contained within the development plan already achieve this purpose. Draft SPD</p> <p>2.3 'To provide a robust and clear development framework with clear, specific development principles to inform the preparation</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 an independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use. This is to be prepared at the planning application stage.</p> <p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations.</p> <p>This SPD will be a material planning consideration in the determination of future planning applications.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	No changes necessary.



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		<p>and determination of planning applications. This will ensure a comprehensive approach to the appropriate uses on the allocated site in accordance with the development plan;'</p> <p>Response</p> <p>2.4 Criterion 2 of Policy AL5 requires: An integrated, coordinated and comprehensive planning approach will be taken for the employment site and a masterplan must be prepared, in consultation with the local planning authority, the relevant highway authorities and other statutory</p> <p>Employment Allocation AL5 3 Frampton Town Planning Ltd Furtho Pit, Old Stratford/Cosgrove PJF/cn/JT/10512 On behalf of Frontier Estates August 2022 undertakers prior to the submission of a planning application covering the development of the whole site.</p> <p>2.5 Criterion 2 of Policy AL5 already achieves this purpose.</p> <p>2.6 The Council already provide a pre -application advice service which can provide further guidance if required.</p> <p>Draft SPD</p> <p>2.7 To provide guidance ensuring that the evidenced based land uses are appropriate to the wider context; and</p> <p>Response</p> <p>2.8 The Criterion 3a OF Policy AL5 requires: An independently assessed, market-evidenced proportion of B1 (business)(office), B2 (general industrial) and B8 (storage and distribution) with ancillary with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.</p> <p>2.9 Criterion 3a of Policy AL5 already achieves this purpose.</p> <p>Draft SPD</p> <p>2.10 To raise design standards and the overall quality of development to create sustainable, exemplary place which are functional and respond to their surroundings.</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Any alternative access proposals will be determined in full at the planning application stage.</p>	

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		<p>Response</p> <p>2.11 Policy SS2 states:</p> <p>1. Planning permission will be granted where the proposed development:</p> <p>a. maintains the individual identity of towns and villages and their distinct parts, does not result in physical coalescence that would harm this identity and does not result in the unacceptable loss of undeveloped land, open spaces and locally important views of particular significance to the form and character of a settlement; and</p> <p>b. uses a design-led approach to demonstrate compatibility and integration with its surroundings and the distinctive local character of the area in terms of type, scale, massing, siting, form, design, materials and details; and</p> <p>Employment Allocation AL5 4 Frampton Town Planning Ltd Furtho Pit, Old Stratford/Cosgrove PJF/cn/JT/10512 On behalf of Frontier Estates August 2022</p> <p>c. is designed to provide an accessible, safe and inclusive environment which maximises opportunities to increase personal safety and security through preventative or mitigation measures; and</p> <p>d. incorporates suitable landscape treatment as an integral part of the planning of the development; and</p> <p>e. incorporates sensitive lighting schemes that respects the surrounding area and reduce harmful impacts on wildlife and neighbours; and</p> <p>f. will result in a good standard of amenity for its future occupiers in terms of privacy, sunlight, daylight, outlook, natural ventilation, noise, odour and vibration; and will not unacceptably harm the amenity of occupiers and users of neighbouring properties and the area through noise, odour, vibration, overshadowing or result in loss of privacy, sunlight</p>		

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		<p>daylight or outlook, unless adequate mitigation measures are proposed and secured; and</p> <p>g. has appropriate regard to its effect on air quality and the effects of air quality on its future occupiers; and</p> <p>h. does not result in the loss of the best and most versatile agricultural land or valued soils; and</p> <p>i. contributes towards the creation of a healthy community and, in the case of major development, demonstrates the health and wellbeing implications of the proposed development through a suitable health impact assessment (HIA). All major developments (10 or more dwellings or 1000 or more square metres) will be expected to complete and submit a rapid HIA in order to determine if more substantial HIA is necessary or not, while larger developments above 100 homes will be expected to complete a more substantial HIA to support their application; and</p> <p>j. would include a safe and suitable means of access for all people (including pedestrians, cyclists and those using vehicles); and</p> <p>k. takes into account existing or planned social and transport infrastructure to ensure development is adequately served by public transport or is in reasonable proximity to a range of local facilities which can be reached without the need for private car journeys; and South Northamptonshire Local Plan (Part 2)</p> <p>l. is adequately serviced with utility infrastructure appropriate to the development including power, water supply, sewerage, waste management and telecommunications, and provides for satisfactory foul and surface water drainage and incorporates mitigation identified through an assessment of flood risk and the management requirements to address current and future risks incorporating the required climate change allowances; and meets the optional higher water efficiency standard of 110 litres per person per day<sup>4</sup> and</p>		

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		<p>m. will not adversely affect built heritage and sites of nature conservation value or sites of geological, geomorphological or archaeological importance; and</p> <p>n. is not on or in proximity to land containing known mineral resources, or if known resources exist without first considering the need to safeguard these resources; and</p> <p>Employment Allocation AL5 5 Frampton Town Planning Ltd Furtho Pit, Old Stratford/Cosgrove PJF/cn/JT/10512 On behalf of Frontier Estates August 2022</p> <p>o. would not pose additional risk to users, occupiers and neighbours located in the vicinity of sites that are used for the storage, or processing or transporting of hazardous substances; and</p> <p>p. shows a detailed consideration of ecological impacts, wildlife mitigation and the creation, restoration and enhancement of wildlife corridors to preserve and enhance biodiversity; and</p> <p>q. ensures an appropriate degree of facility provision and waste and recycling storage. Provision should be made for discrete bin storage, ideally within private rear gardens and service yards where it will not result in visual clutter which can substantially detract from the character and perceived quality of the streetscene.</p> <p>2. Proposals that contravene any of the above criteria (of relevance to that proposal) will be refused unless outweighed by other material considerations.</p> <p>3. Major development proposals will also be required to: a. retain, enhance or create a high quality public or semi-public realm; and b. enhance legibility through the spatial pattern of development and street hierarchy.</p> <p>4. The use of design codes, masterplans or planning briefs will be considered for multi-phased developments to ensure consistency of design approach.</p> <p>2.12 Policy SS2 already achieves this purpose.</p>		

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		<p>2.13 It has been demonstrated that the purposes of SPD have already been met through the existing policies contained within the development plan, as such it is not considered that a need arises for an Employment Sites Allocations Development Brief Supplementary Planning Document. Draft SPD</p> <p>2.14 Page 38 of the SPD refers to 'small, medium and large unit sizes', and states: For AL5 the scale of buildings in Wolverton Mill provides a broadly similar scale context for small to medium buildings/units, with units ranging from 220m<sup>2</sup> to 7,150m<sup>2</sup>. As such the above will also apply to this site. Response</p> <p>2.15 Criterion 3a of Policy AL5 requires the submission of an independently assessed market report, this report will provide evidence of the market demand for the proportion of B2 (general industrial), B8 (storage and distribution) and E(g)(i) offices and E(g)(ii) research and development uses. It will also provide evidence of the scale of the units required by the market; it is therefore inappropriate for the SPD to make a presumption on the range of unit sizes which is not supported by an independently assessed market report. Employment Allocation AL5 6 Frampton Town Planning Ltd Furtho Pit, Old Stratford/Cosgrove PJF/cn/JT/10512 On behalf of Frontier Estates August 2022 Draft SPD</p> <p>2.16 Paragraph 6.85 states that: 'The development framework AL5 provides an access into the site off the A508, with a new roundabout midpoint between Old Stratford Roundabout and the road's flyover of the Dogsmouth Brook' Response</p>		

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		<p>2.17 Following detailed highway surveys and assessment vehicle access is proposed from the A508 via a signalised T-junction, this differs from Policy AL5, which is a roundabout junction. The proposed access has been moved further away from the Old Stratford roundabout, in order to alleviate potential issues of traffic backing up between junctions and causing problems along the A508. The reason for the change is that there are potential safety concerns providing a roundabout further north as it would prevent forward visibility for drivers approaching from the north on the A508 to the nearside signal head. A signalised T-junction would remove the potential safety concern.</p> <p>2.18 The SPD should recognise that alternative access arrangements may be provided if they remove potential safety concerns.</p> <p>3.0 CONCLUSIONS</p> <p>3.1 It has been demonstrated that the purposes of SPD have already been met through the existing policies contained within the development plan, as such it is not considered that a need arises for an Employment Sites Allocations Development Brief Supplementary Planning Document.</p> <p>3.2 It is inappropriate for the SPD to make a presumption on the range of unit sizes to be provided on employment allocation AL5 which is not supported by an independently assessed market report.</p> <p>3.3 The SPD should recognise that alternative access arrangements may be provided at employment allocation AL5 if they remove potential safety concerns.</p> <p>ONLINE SUBMISSION</p> <p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No</p>		

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		<p>Please provide comments to support your answer: Please refer to attachment submitted in email 18/08/22.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Not Answered</p> <p>Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p> <p>Please provide comments to support your answer: 7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>Please provide comments to support your answer: 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury  10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered  Please provide comments to support your answer:  11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?  Not Answered  Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove  12 Do you agree with the constraints and opportunities identified in respect of Site AL5?  No  Please provide comments to support your answer:  Please refer to email submitted 18/08/22.  13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?  No  Please provide comments to support your answer:  Please refer to email submitted 18/08/22.  Any other comments  14 Are there any other comments you wish to make which you have not already made?  Are there any other comments you wish to make which you haven't already made?:  Please refer to email submitted 18/08/22.</p>		



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SPD237	R Middleton CC Town Planning Clowes Development	<p>We write on behalf of our client Clowes Developments (UK) Ltd in regard to the ongoing consultation, by West Northamptonshire Council (WNC), into the content of the recently published (draft) Employment Allocations Development Brief Supplementary Planning Document which was issued in June 2022.</p> <p>The SPD serves to provide supplementary guidance on the implementation of policies contained within the South Northamptonshire (Part 2) Local Plan (2011-29) (LP2), most notably those policies (AL1-5) which each allocated land for economic development purposes.</p> <p>On behalf of our client, CC Town Planning have engaged extensively with WNC and the predecessor authority of South Northamptonshire Council at every stage of the production process of the LP2.</p> <p>For clarity, Policy AL4: Shacks Barn of the LP2 allocates our client's site for economic development purposes and is referenced throughout the draft SPD.</p> <p>The site is now the subject of an outline planning application (Ref: S/2020/2337/MAO) which is now progressing towards determination in the second half of 2022.</p> <p>It is not the purpose of this letter to rehearse those points which have been raised with the Council during those formal phases of consultation during the production of</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>In accordance with planning law, planning applications will continue to be determined against the development plan and any other relevant planning considerations.</p> <p>This SPD will be a material planning consideration in the determination of future planning applications.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p>	

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		<p>the LP2. Furthermore, the outline planning application is at an advanced stage and within that submission, which is publicly available on the Council's website, there is a wealth of technical information in regard to the site and its context.</p> <p>This submission therefore relates to the content of the SPD, the role it will play, its content and implementation and these comments are made in the context of our client's landholding at AL4.</p> <p>Representations</p> <p>Our client welcomes the principle of producing an SPD to provide clarity and guidance on the implementation of those policies within the LP2. It is an approach which will serve to manage expectations and provide clarity to all parties including the general public, elected members, officer's and landowners alike. Therefore,</p> <p>CC Town Planning Ltd. Registered Office: Thistledown Barn, Holcot Road, Sywell, Northamptonshire, NN6 OBG Registered No. 9729552. VAT No. 219570792</p> <p>the approach is welcomed as a positive addition to the Council's suite of local development documents.</p> <p>Our client's site, known within Policy AL4 of the LP2 as Shacks Barn, Whittlebury, is allocated for employment generating purposes within the development plan and will serve to meet those five roles which are set out at Para 13.1.5 of the LP2 and quite correctly rehearsed at Para 1.4 of the consultation document.</p>		

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		<p>Our client welcomes the acknowledgement provided within the SPD at Paras 1.23 to 1.25 relating to the conclusions of the Sustainability Appraisal (SA), Habitat Regulations Assessment (HRA) and Equality Impact Assessment (E&amp;I) undertaken for the LP2 being applicable to this SPD.</p> <p>The client recognises the importance of the Rapid Health Impact Assessment (RHIA) tool and the emphasis that the Council place on its completion during the application process. As part of their outline planning application, our client has engaged in the continuous revision of a RHIA which will be revisited at appropriate stages both during their current and subsequent reserved matters applications.</p> <p>Para 1.28 of the SPD provides assured recognition of the locational importance of the Shacks Barn site and the key role that the A43 will play in its future success. This important part of the country's strategic infrastructure will be both a key driver of the longevity of the site and will ensure that the site remains relevant to the economic growth of the area long into the future.</p> <p>In explicit reference to the Shacks Barn site, Para 1.41 – 1.44 provides some wider contextual details which, although not incorrect, serves to provide unnecessary detail which is covered elsewhere in the wider suite of Local Development</p>		

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		<p>Documents (LDD). Therefore, it is urged that these paragraphs be simply condensed to reflect the strategic contextual info as contained within the LP2 rather than providing unnecessary detail or repetition. The point raised at Para 2.9 of the SPD is key to the interpretation and implementation of the document. The literature is exactly as titled, supplementary, and it should be made abundantly clear to the reader that the document does neither compete with or override the provision of the LP2 or its primacy in the decisionmaking process.</p> <p>At Para 3.2 the SPD quite correctly highlights the provisions of Para 13.1.5 of the LP2. It is our client's position that the bullet points from the LP2 (at Para 13.1.5 of the DPD) are correctly paraphrased within the SPD. However, there is some confusion when comparing this to the explanatory text to Policy AL4 which allocates the Shacks Barn site for employment generating purposes. Para 13.3.2 of the LP2 states 'this allocation proposes to extend the business park with a range of new small and medium sized business units...' It is this particular sentence which, along with others within the DPD, has caused some confusion to the reader of the LP2.</p> <p>The SPD provides a real opportunity to define what the Council is attempting to</p>		

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		<p>achieve. The approach advocated within Para 13.1.5 of the LP2 provides a hook for the SPD to provide prescription which limits the physical size of a unit. However, Para 13.3.2 of the LP2 appears to ensure that the needs of small to medium sized business (SME's) are met. With the above in mind, it is clear that for economic prosperity to be maximised, the needs of the market need to be met. Some medium sized businesses may have a high or low employment density which could require a range of unit sizes. Some smaller businesses may have a significantly lower employment density but may require a larger unit for fabrication or storage purposes. It is felt that these differing needs should be recognised and conveyed to the reader.</p> <p>CC Town Planning Ltd. Registered Office: Thistledown Barn, Holcot Road, Sywell, Northamptonshire, NN6 OBG Registered No. 9729552. VAT No. 219570792</p> <p>At page 38 of the SPD a discussion is provided in respect of small / medium / large unit sizes. Whilst it is appreciated that the documentary is only supplementary it is felt that this is a key opportunity to instil flexibility into the suite of LDDs. Such an approach will ensure that the needs of all SMEs can be met and that in some cases that smaller or medium sized businesses do not necessarily fit within those prescribed parameters set out within the visual representations provided by the</p>		

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		<p>author.            To rehearse, the issue and relationship between unit size and business size needs to be fully recognised and reflected throughout the SPD. Whilst the prescription provided at Page 39 does provide the reader with clarity it is considered that such prescriptive requirements could in some cases serve to stifle development. At Section 6 the National Planning Policy Framework (NPPF) seeks to create conditions where business needs can be met and which allow them to invest, expand and adapt. On this basis it is urged that page 39 be supplemented with an appropriate caveat to state that such sizes are only an indication and will be flexibly applied with a full appreciation of respective sites and their known constraints. Therefore, whilst we do not completely discount their inclusion, these sizes should be highlighted as guidance only and be supplemented with the caveat that they are not an absolute cap. Whilst the Overarching Design Principles within the SPD do provide the reader with an overall appreciation of the context for decision making, it is once again considered overly prescriptive and unnecessary. The LP2, which has been independently examined and ratified, contains those detailed policies relating to design and provides sufficient provisions to negate the need for Section 5 of the SPD which is</p>		

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		<p>repetitive of adopted policy.  Pages 74-77 relates specifically to our clients holding at Shacks Barn, Whittlebury.  The inclusion of the assessment at the aforementioned pages is considered to be needless and too strategic in its assessment to provide any supplementary guidance to assist the decision maker.  The AL4 site assessment provides further unnecessary discussion of the site, and the key features are set out within the evidence base which supported the production of the LP2. It is urged that the reader be signposted to the LP2 evidence base for background information in respect of the site rather than providing a snapshot discussion of the sites current condition. The reader needs to be aware that this SPD covers the life of the plan and the life of those policies to which it relates and should be flexible to changing circumstances over the plan period.  Para 6.58 of the consultation document states that no ecological surveys have been undertaken for our client's site. This particular sentence is wholly incorrect, and a wealth of ecological work has been progressed for the Shacks Barn, Whittlebury site this work commenced in 2020 and remains ongoing. It is therefore urged that this reference be updated to reflect the reality or alternatively removed altogether.  Having reviewed the SPD's Development Framework for our client's landholding, it</p>		

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		<p>is considered that whilst this portion of the document does not cause offence, it is not appropriate for inclusion within the document. A key question that should be investigated and answered is that of what has informed the Development Framework and what evidence there is to support its inclusion within the SPD. It does align with the indicative proposals within our client's current outline planning application, however our client's proposal are just that, indicative, and the eventual development on site should be as a result of collaborative working between the LPA and Applicant rather than pre-determined within SPD. Repeated references to heights and sizes are not considered to be productive, the technical constraints will be identified during the application process and by limiting heights from the outset, in a market where</p> <p>CC Town Planning Ltd. Registered Office: Thistledown Barn, Holcot Road, Sywell, Northamptonshire, NN6 OBG Registered No. 9729552. VAT No. 219570792</p> <p>ceiling heights are as important as floor areas, will only serve to adversely impact the delivery of those importance AL sites. In respect of the wider raft of AL sites, it is considered important to acknowledge that these sites, along with the strategic sites contained within the Joint Core Strategy, have been carefully evidenced and allocated through the development plan</p>		



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		<p>production process. If these sites do not meet the needs of the market for employment floor space, then the only alternative will be further speculative planning applications to meet the volume of space required by the market.</p> <p>This is an important point when considering offsite mitigation measures, such as attenuation and landscaping measures (amongst others), sterilising large swathes of the allocated sites through requiring this to be on site, will only serve to increase the demand for yet more land to deliver the strategic floorspace requirements of both the development plan and those aforementioned market needs. It is further urged that the plan contained on Page 77 be removed, constraints and key frontages will be determined through reserved matters submissions. Whilst the plan largely accords with our clients indicative submissions contained within their outline planning application, the SPD is not supported by a dedicated evidence base to support the inclusion of this figure. Section 7 of the document needs to be revised to provide guidance on the application of relevant policies, to those areas mentioned, which are contained within the LP2. Annex A and Annex B should also be removed as they provide unnecessary repetition of text contained elsewhere within the wider suite of LDDs.</p>		

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		<p>In conclusion, our client both welcomes the Council's efforts to produce a supplementary planning document to assist in the application of those relevant policies from the LP2. However, it is considered that the document should make it clear from the outset that the document is not adopted planning policy and is there to assist both the decision maker and all other stakeholders in applying those formally adopted policies from the development plan. Yet further it is our position that the role of the document, its production, publication and application should be made clear within the introductory text contained within the final version.</p> <p>To this end, the Council's intention to produce an SPD is commended and it is hoped that the above proposed alterations will serve to make this non-statutory local development document both sound and fit for purpose. The use of such a tool to provide guidance on the application of the development plan can be powerful, particularly in those proposal which have particular sensitivities as such it is hoped that the document can provide absolute clarity to the reader on the role it will play.</p>		
SPD23 8	J Farhead	<p>I live at , and in the 6 years that I've been here, there's been nothing but increasing developments and no change in infrastructure. You've already been bombarded with emails detailing opposition to various sections and subsections of</p>	Comments noted.	No changes necessary.

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		<p>whatever planning permission got bribed into approval, and for me to reiterate the same points that you're going to ignore is pretty much pointless. We live right on but have to drive out of Towcester, Eastbound to Northampton, to then join the A43, and loop back into Towcester to drop kids off at school.</p> <p>I've waited 2 years to get onto the NHS list because the council keeps building when there is no infrastructure... And now my dentist has put me on a 18/25 month wait before I can get another appointment.</p> <p>You but the estate up at the racecourse, and instead for completing the houses symmetrically on the roundabout, you scrapped the second half and out a playground right next to the most polluting section of the road; right here the cars/trucks brake then accelerate.</p> <p>You're still lying about the bypass being built. And we have residents with newspaper cutouts from decades ago mentioning the bypass lies... But you keep building.</p> <p>I am forced to commute on a motorbike all year round, all conditions, because if I don't, I'd never make it home to see my kids to bed, because you've allowed the A5 to become the M1's new truck lane.</p> <p>And now you've given the locals the middle finger once again, and you're building a truck launching site, for minimum wages, to 'help' a town that already has stationary traffic due</p>		

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		<p>to truck traffic, and where you can't get a house for under 500k... You know, the kind of buyers that work for minimum wage at a warehouse kind of house.</p> <p>I'm sure you'll bin this like the rest of the emails and complaints, and carry on living the life outside Towcester, so I'll end my rant here. Even if I vote you out, one of your cronies will replace you, so what's the point.</p>		
SPD239	G Lavers Silverstone Parish Council	<p>Please find below our comments on the Supplementary Planning Document (SPD). No doubt many of our comments will be similar to those you receive from others. It is hoped that WNC representatives will take full account of the views of the community and that those views will be reflected in the final version of this document. To this extend, the following views and report have been ratified unanimously by the councillors of Silverstone Parish, who were in attendance to our full council meeting on 12th August 2022.</p> <p>It is felt that the concerns already raised to yourselves regarding the independence and likelihood of impartiality with Barton Willmore have not been adequately addressed. This document carries significant importance to the local community and as such, demands the respect of proper and impartial leadership, governance and input. I urge you to take action on this matter without delay.</p> <p>The SPD has consistent use of the terms such as 'may', 'should', 'seek to', 'where</p>	<p>Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner.</p> <p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to</p>	The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.

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		<p>possible', 'explore', 'look to', 'could', etc. Given the purpose of the SPD is to give clarity and take away ambiguity, terms such as these fall short of this objective.</p> <p>It is strongly felt by both the council and widely amongst our community that Silverstone has a long lasting history with the motorsport and engineering industries. Therefore, any further development should be in keeping and complimentary to this, providing skilled employment and learning opportunities to the local workforce. The proposed large scale logistics warehousing is not complimentary or appropriate to the region and the likelihood of automation integration in these buildings is high, contradicting various statements purporting to provide employment opportunities. Even without automation being a factor, we have seen no evidence of an employment gap and subsequent need for mass unskilled employment opportunities in the area. The council believes the size and scale of any developments up to 5,000sqm must have a ridge height of no more than 10m. This should be applicable to all sites except AL4, which given it's location and visual impact on ridge, should be no more than 7.5m.</p> <p>The council does not believe that any developments on these allocated land sites should be greater than 5,000sqm in footprint. This should be the size of the building itself, rather than units within a greater shell. There must also be no opportunity for developers or owners</p>	<p>be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p> <p>Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	

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		<p>to amalgamate multiple units down the line to create buildings greater than 5,000sqm.</p> <p>It is the overwhelming opinion of the local community of Silverstone and it's council, that the existing traffic management plan and configuration of access roads to the A43, to the north and south of our village, will result in the majority of traffic travelling to and from locations to the south of the site coming through the village, in particular, unacceptable levels of HGV traffic. This will cause a vastly detrimental impact on the existing quality of life, enjoyment of quiet roads and safety of our vulnerable and young residents. The council cannot accept any plan that results in a significant increase in traffic through Silverstone and our neighbouring villages. The existing traffic assessments have not adequately considered the wider impact on our roads. We feel the AL4 development must have access to the A43 to both northbound and southbound carriage ways without passing through our quiet village.</p> <p>As a council, we believe it is essential that we were expertly informed and guided around the technicalities of this document. Therefore, we have commissioned a local planning expert to review the SPD and draft a report. I enclose this report as attached and is fully endorsed by the Parish Council. We understand this report has been compiled in a collaborative way amongst a number of groups and communities, but would stress our</p>	<p>impacts on the roads would be severe.</p>	

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		agreement with all points made.		
SPD240	C Croft	<p>Having read the Local Plan (2) I am surprised that the SDP needed to be written at all given the very clear emphasis throughout the LP for 'small and medium units' on all the AL sites, but it proves just how easy it has been for developers to manipulate policy to their own advantage and for planners to let them get away with it. It is therefore vital these loopholes are closed by the SPD.</p> <p>If the aim of the SPD is genuinely to reduce uncertainty and provide clear guidance then the wording needs to be much tighter. If not, the open ended language in the draft SPD will be dismissed by the developers who will carry on regardless. Recommendation: Remove all the 'should, explore, could, exceptional circumstances' wording and make it absolutely clear what is and isn't acceptable. There can be no ambiguity.</p> <p>Recommendation: Limit any building height to 10m to ridge and 5,000m2 footprint max. These are the local precedents and will set precise measurements, which cannot be breached.</p> <p>The greatest concern for this area is traffic. The situation in and around Towcester now is unacceptable, we are often at gridlock, so how will it run freely with the addition of thousands of extra HGVs and cars from these sites? We do not have the road infrastructure to support developments of this kind. The local road network will fail to absorb the increased traffic and the road fabric will deteriorate.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards. Additional wording has</p>

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		<p>Recommendation: The SPD includes obligation on every development to take part in independent cumulative traffic assessment, not just for their own access and application, but in conjunction with all of the following:- the opening of the link road, the AL3 development, when all the houses are built on the SUE, when the M1 is closed or blocked (as per Friday 12th August). Greater detail is needed on the traffic impact on local roads and how to prevent them becoming rat runs or parking lots for waiting site vehicles. The SPD should include binding significant developer contributions to the ongoing financial upkeep of local roads, and fines imposed if local roads are used for parking or waiting. Towcester is an historic, small, rural market town. If these developments go ahead it will be smothered by huge, 24/7 logistics warehouses with no aesthetic appeal and all the associated noise, light, air pollution. Exemplar development on page 84 must be enforced.</p> <p>Recommendation: Greater importance should be given in the SPD to protecting the rurality and heritage of Towcester – it is the oldest town in Northants with Iron Age, Roman, Norman and Civil War history. Therefore the SPD must reduce visual impact and overbearance on the area with all industrial buildings screened from the roadside and sensitive receptors, as well as restricted operating times and type of business occupier ie no last mile delivery. In addition this screening must be subject to a legally binding maintenance programme on the part of the</p>	<p>an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>	<p>been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>



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		<p>developer.  The Local Plan 2 was intended to “attract new investment and provide more jobs to match the skills of local people” and correctly identifies on page 21 our Socio-Economic Context. Large scale warehousing will not address the skills and educational attainment of the local population.  What will happen is that the required work force for warehousing will be bussed in and thereby increase levels of in-commuting – all adding to the traffic congestion.  Recommendation: The SPD requires developers to stipulate the % mix of employment offering per site and the skill levels required to meet those jobs. This needs to be independent and not funded by the developer to suit their narrative.  The SDP notes that AL3 is not covered by the SDP (Page 6) Recommendation – this needs to be changed so that any future development on that AL3 site falls within the SPD’s scope – including any changes, remodelling, extensions, renewing lapsed permissions or changes to the existing planning permission.  In addition, the SPD must state that AL3 cannot be used as existing context or precedent by developers of AL1/2/4/5.  The SDP includes Swan Valley as a Contextual Consideration (page 26).  Recommendation – Swan Valley is removed as it has no contextual relevance to the rural character of Towcester and the surrounding villages.  Furthermore, Swan Valley is identified as a “Strategic” site in the WNJCS but AL1-5 were selected specifically as “non-strategic” sites in</p>		

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		<p>order to be included in the Local Plan.</p> <p>The SPD states on page 38 The existing scale of employment buildings/units along the A43 sets a precedent scale for new development on sites AL1, AL2 and AL4 and helps to define a scale for small medium and large and then gives sizes.</p> <p>Recommendation: This is helpful but 5,000 m2 is the precedent for employment buildings along the A43 and therefore that is what should be used as the limit.</p> <p>The SDP should state that Site 4 on page 28 is the contextual consideration and existing precedent for AL1 and AL2. Site 6 on page 30 is the contextual consideration and existing precedent for AL4.</p> <p>The SPD must state that AL3 cannot be used as existing precedent for AL1-4.</p> <p>Remove 'exceptional circumstances' as NO LARGE-SCALE BUILDINGS can be acceptable on sites AL1-5. To include provision for large buildings is to introduce new policy and would contradict the relevant Local Plan policies.</p> <p>The SDP should state that it must not be possible to join up smaller/medium sized units at a later date to create large units. 5,000 m2 must be the footprint limit in perpetuity and will comply with the Local Plan intent for small and medium units.</p> <p>The section on Exemplar Development pages 84 to 85 is welcome and must be the starting point and driver for all these developments if they are to integrate successfully into this area. None of the existing applications for AL1/2/4/5 offer these exemplars.</p> <p>Recommendation – The SPD should state that compliance with all 4 Exemplars (7.1 to 7.5) are</p>		

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		mandatory in order for planning permission to be considered.		
SPD24 1	M Crussell	<p>As a resident of Towcester I attended as many of the presentations about plans for the area as possible – on line, in person, by WNC and DHL.</p> <p>I welcomed the decision to ask for supplementary guidance on the local plan part 2 as it felt that the intention of this had been misinterpreted to the disadvantage of our area. Change must happen and can feel hard to accept. It needs to benefit the local area, not add to already overstretched local resources, to the detriment of the whole population.</p> <p>Air quality Little mention of this important issue. For years there has been a problem in central Towcester especially on the A5. Although some efforts to mitigate have been made by SNC now WNC the inevitable rise in pollution from the increase in HGV traffic on this road, and the A43, will just add to the issue.</p> <p>Traffic volumes Both the A43 and A5 are very often at peak capacity. When the M1 or M40 have problems, it seems very frequently, this is just amplified. To allow 3 large scale developments – AL1/AL2/AL3 – all planned to have large additional numbers of vehicle movements – all situated in close proximity but deny that these volumes must be considered cumulatively, seems to fly in the face of any logical consideration of the outcomes. Policy may say that this has to be done, but sometimes policy needs to be tested against the reality of the situation which will impact the whole area. Together with the additional homes being built in the expansion of Towcester, traffic will only increase.</p> <p>Heights and sizes of the proposed buildings From reading the SPG its evident that the heights recommended for all the sites vary enormously. Some of the sheds built adjacent to motorways are recessed into the ground to minimise visual impact. If that's considered necessary in</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>those locations, why is that not applied to any of the sites within scope? Having viewed a crane at the proposed heights of the DHL site on the opposite side of the A5 to it, it's obvious that these buildings will dominate the sky line. They will not create an inviting new approach to the ancient market town of Towcester.</p> <p>The footprint of 8000 m upward for large sites could mean even larger more dominant developments in the future.</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	
SPD24 2	M Richardson	<p>I have been made aware over the past weeks of the large scale applications that have been put forward for the areas around the A5 and also the A43.</p> <p>I am a and have a number of concerns regarding these currently beautiful areas.</p> <p>From the documents seen I am concerned that unless strict controls are legally in place any developments may well grow out of control. I would like some assurances that the following points in particular have been thoroughly considered.</p> <p>1. TRAFFIC</p> <p>In the case of Shacks Barn in particular, although there is access from the north to the site, there is no direct access from the south. This obviously means that haulage and other traffic will leave the A43 at Brackley Hatch and travel along the A413 through Silverstone Village, past the infant and junior school to Shacks Barn.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best</p>

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		<p>Furthermore, once the Towcester relief road is complete this will be made worse, probably in both directions. I can only imagine that this will become massively worse when there are problems on the M1. I would hope that a full traffic assessment has been completed including the effects of housing developments at, but not restrictive to, Silverstone Leys and Towcester Race Course.</p> <p><b>2.BUILDING FOOTPRINTS</b> I am extremely worried about the changes to footprint sizes that I understand have been proposed. I am led to believe that originally discussions allowed for small and medium sized units. However, this has now changes to 8,000m2 units with no upper limit. I would certainly oppose anything along these lines. I would also like there to be some legally binding control over how these structures would look. As you are aware the countryside around the area is currently beautiful, once ruined it cannot be reversed.</p> <p><b>3 BUILDING HEIGHTS</b> I am advised that a proposal exists for a 15m structure at Shacks Barn, 16m at The Bell Plantation and 12m at Woolgrowers. Shacks Barn is visible a considerable distance and no amount of tree planting will hide this possible construction. At least 15 years would be needed for vegetation to grow sufficiently to be considered a screen. In all the above locations I would ask that height restrictions be out in place to limit building heights to be well below the proposed levels. I understand that a 7m maximum height has been suggested.</p> <p><b>4 LIGHT POLLUTION</b> As one has to assume that the proposed buildings will operate 24 x 7, I would be very unhappy with the potential light pollution that will emanate from these buildings.</p>	<p>highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations.</p>	<p>shape a proposal for each site. Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

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		<p>5 POTENTIAL EMPLOYMENT FOR LOCAL PEOPLE</p> <p>As far as I am aware, there is no evidence that unskilled or low skilled warehouse jobs would be suitable for people who live in the surrounding areas. I would like to know how this has been assessed in tangible terms including actual skill levels and NVQs.</p> <p>I would hope that you will take into consideration the above points and come back to me with your answers and reassurance that I have asked for.</p> <p>I hope you realise that I am totally opposed to all the developments mentioned due to the reasons stated, as a community we would be taking a step back not forward.</p>	<p>Any harm would need to be outweighed by benefits.</p> <p>Individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	
SPD24 3	J Tait Planning Prospects Bell Plantation Alban Mann	<p>Employment Allocation SPD Consultation July 2022</p> <p>Representations on behalf of Bell Plantation / Alban Mann LLP</p> <p>Background, para 1.4</p> <p>Approach and Role of Employment Site</p> <p>It is unfortunate that the Council have not proposed to produce this SPD earlier in the Development Plan process as 2 years on from the adoption of the Local Plan Part 2, all of the employment allocations around Towcester have already had significant pre-application engagement with the Council, received advice on the approach to the development of the sites, and have planning applications running. The approach seems more about creating policy to justify the potential future concerns about the current applications rather than a genuine attempt to create positive planning policy for the area and are a reaction to the concerns raised during the determination of the application for AL3.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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		<p>The status of the SPD should also be explained in the introductory section, noting that Supplementary Planning Documents (SPDs) are intended to expand upon policy or provide further detail to policies in development plan documents (DPDs), but they cannot create or set out new policy requirements and do not have development plan status and are not part of the statutory development plan.</p> <p>The role of the five new employment sites is set out and is taken from para 13.1.5 of the Part 2 Local Plan – these are not requirements for all employment sites and this should be made clear at the outset – some sites may contribute to only some of these roles and it is only a combination of the 5 allocated sites together which achieve all 5 roles – of some importance is also para 13.1.2 of the Part 2 Local Plan which states that employment sites are also needed to respond to inward investment and capitalise on planned transport improvements to the A43, M1 and M40. This should also be highlighted as background. This should also, as balance, be explained at 2.8 and 2.22 of the SPD.</p> <p>Background 1.10</p> <p>AL3 It is recognised that the publication of the draft SPD has followed after the council have already granted planning permission for AL3 which is unfortunate. However, the way the council gave permission to that development, the requirements of that planning permission against policy and the scale, nature and standard of development approved against Part 2 Local Plan policy has to be recognised and set some</p>	<p>The Local Plan Part 2 requires an independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals</p>	<p>Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>degree of requirement for consistency in approach and decision making – it, at the very least, sets a context for the development of those sites in the vicinity of AL3 and the parameters and approach to what the council have already approved should be set out in the SPD.</p> <p>Assessing Impacts 1.21 Transport Assessment</p> <p>More needs to be set out here in respect of the approach to transport assessment and to the consideration of cumulative impacts. The Council in consultation with the Highway Authorities need to be more clear and consistent in their approach to the assessment of sites. Traffic and transport implications of the proposed developments has, in the context of the determination of the planning application for AL3, been a key local consideration. It was not satisfactorily dealt with at that time and this section does nothing to explain how cumulative considerations need to be addressed – the SPD needs to highlight the need for a consistent approach to assess impacts.</p> <p>Page 10 – Policy AL1 Policy requirements</p> <p>The approach here may be best to state in full Policy AL1, albeit it is noted that the full policy is appended – the summary description here fails to include detailed aspects of the policy which were very carefully scrutinised and discussed at the Local Plan</p>	<p>would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	



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		<p>Examination stage – by way of examples;</p> <ul style="list-style-type: none"> <li>- There is no requirement to provide the football club with a separate access</li> <li>- There should be no miss -interpretation that the development of the employment sites in any way supports or funds the delivery of the football club which would not be lawful in planning terms</li> </ul> <p>It should also highlight that the policy requires the mix of employment uses to be the subject of independently assessed market evidence and also allows for other supporting uses to the site. It also explains what Development Plan policy sees as “Key site specific design and place shaping principles”. These are the Development Plan requirements and should be prioritised in that context for the SPD. Noteworthy, there is nothing in Development Plan 3 policy which specifically sets scale, mass or detailed layout requirements for the site’s development, nor more detailed design guidance other than all development needing to respond to design policy within chapter 7 of the Local Plan.</p> <p>Page 10 Current Planning Status</p> <p>Mention is made here of application 21/2168 – whilst this section highlights that the full description of the application can be seen on the planning portal, it is important to highlight that this application includes for a range of employment uses including employment light industrial uses within Class E. It is also submitted with a range of parameter plans which set limitations on scale and layout.</p>		

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		<p>Page 20, 2.23 Mix of uses There is nothing in the Local Plan policy which requires the scope of the study to independently assess the mix to be first agreed with the council</p> <p>Page 20, General Development and Design Principles</p> <p>Reference is made here to Policy SS2 of the Local Plan in respect of general development and design principles and this is important as this policy forms part of the Development Plan and was independently examined. Reference could also be made here to Chapter 7 of the Local Plan which explains the required approach to design standards. What is evident from the Local Plan is that there is no requirement for these or any developments within the Local Plan to be “exemplar” in their approach – the term consistently used in the Development Plan and Government Policy is “high quality”. By consistently using the term exemplar within the SPD, it creates an unrealistic and new policy test for these developments which is unreasonable. The developments should be high quality in design terms with sustainable inclusiveness in line with Development Plan policy. The SPD should not refer to or expect exemplar development and all references to exemplar should be replaced with “high quality”.</p> <p>Page 38 Small, Medium and Large Unit sizes</p> <p>This section of the SPD is seeking to link the aims of the allocations with the local context. In the absence of any understanding of the demand and needs of</p>		

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		<p>business, the assessment is only influenced by local context. An analysis of what employment buildings are already in the local context and their scale does nothing to understand how a new range of buildings</p> <p>4</p> <p>for the economy would address the employment allocation objectives – more, given the current failing circumstances of outward commuting, looking to mirror the local range of buildings will merely only serve to replicate space already in existence. There is also a fundamental different context to these allocations – reference is made to the buildings at Bell Plantation as some degree of precedent for building of the A43 corridor, however that was developed as an expanded garden centre with a countryside policy designation.</p> <p>The existing scale of buildings along the A43 should not be described as the precedent for the new buildings. No mention is made of the new planning permission at AL3 which must be seen as a significant precedent and should be assessed here.</p> <p>The is nothing in Local Plan policy which states that larger buildings should only ne allowed in “exception circumstances” – this creates a new policy hurdle and test which is not justified.</p> <p>Page 42 – para 4.1 onwards Landscape and Visual</p> <p>There is no mention here of the granting of planning permission for AL3 – the scale and mass of building as approved sets a significant precent - as a commitment</p>		

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		<p>it should be set out in the analysis here of landscape context for the results to have any meaning.</p> <p>Some of the key viewpoints need to see the sites here in the context of AL3 and include for its parameters of development as approved.</p> <p>Page 66, 6.14 Ecology Surveys have been undertaken by the owners of the site AL1 and have been included in the planning application submissions such to confirm that ecology issues do not present any impediment to the development of the sites and some biodiversity gain can be achieved through on and off-site mitigation.</p> <p>Page 68 AL1 Development and Framework</p> <p>Some explanation needs to be given as to the status for this section and the Framework for the development of the site set out. It is evident that the Framework has been prepared without a full and comprehensive, complete understanding of the site and technical feasibility of some aspects including for example drainage. It should also not be seen as a specific prescriptive arrangement for the development of the site, more of an illustrative approach, particularly as it refers to the precise alignment of 5 proposed footpaths through the site or the location of SUDS.</p> <p>Aspects noted and supported are the approach to access from the A5 albeit there is no mention of the current access to Bell Plantation and to whether this should be closed/relocated. The location of the sports pitches is supported.</p> <p>Aspects not supported or requiring further discussion</p>		

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		<p>or clarification include the following;</p> <ul style="list-style-type: none"> <li>- New tree planting is proposed to the southern A43 boundary of the site however this is already substantially planted and is not a key frontage for building as the buildings will be set behind the existing landscaping</li> <li>- The opportunity to expand the Bell Plantation Garden Centre site should be supported as the location for complimentary and supporting uses for the development, an aspect of Local Plan policy</li> <li>- New tree planting is proposed between the sports pitches and the southern area of the AL1 allocation however such planting would not perform a landscape function of screening, although may soften some views – it is not a critical landscape requirement for the site</li> <li>- The East West Green Link is not supported as proposed in extent or location – the existing Bell Plantation is noted as existing juvenile planting and it is welcomed that this is recognised as being suitable for removal – it has been assessed to be of low ecology value and will in this location perform no useful landscape screening function – it is a manmade non-native feature and its removal has also been supported by consultees -its existence would in any event conflict with the proposed East West Green Link – connections east west through the site to the sports pitches and beyond are appropriate but do not specifically need to be on this alignment however – moreover some route through and</li> </ul>		

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		<p>further south would provide more convenient access to the playing pitches and encourage active sustainable travel on a more convenient and shorter route.</p> <p>6</p> <ul style="list-style-type: none"> <li>- The key frontage overlooking this east west active route fails to understand the approach to employment building where large sections of blank facades will inevitably be common place – active frontage should be to highways as it will be very difficult to create an active over looked route as envisaged in the SPD with the type and range of employment uses proposed for the site.</li> <li>- Drainage references the requirement for rain gardens which is not clear or understood – mention is made of the need for a drainage strategy and providing this makes appropriate sustainable proposals with regards to drainage, the prescription set out in the SPD is unnecessary</li> <li>- The green link is suggested to separate development in the northern section from the southern but there is no design justification or rationale for this, particularly, as more southerly connections through the site would better encourage walking routes to be used and more convenient</li> <li>-</li> </ul> <p>Chapter 7 Exemplar Development</p> <p>The extent to which this section sets new policy requirements which should be first set within the</p>		

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		<p>Local Plan needs careful consideration – it is not for the SPD to set new policy requirements – references to Exemplar standards should be replaced with the term “high quality”. In line with the SPD, we would wish to see the allocated employment sites brought forward following a design-led approach, that sees the delivery of contextually appropriate high quality buildings situated within high quality landscape setting. It is not for the SPD to set a standard that requires exemplar provision in sustainability and zero carbon development – this is a new policy requirement, not within the Local Plan. Nor is it for the buildings to be exemplar in design and architecture – different occupiers require buildings of different specifications and function and providing they achieve a high quality in design, then policy requirements should be met</p>		
SPD24 4	J Barrie	<p>EMPLOYMENT SITE ALLOCATIONS DEVELOPMENT BRIEF SUPPLEMENTARY PLANNING DOCUMENT SPD July 2022 – Prepared by Barton Willmore</p> <p>I welcome the introduction of a Supplementary Planning Guidance Document and hope that it can mitigate the errors that have been allowed to occur with the current Local Plan 2. However, statements must be definite, not “should, may, possible” for example. The document must leave no doubt to be further exploited by developers so planners are totally clear what will be acceptable.</p> <p>First of all I would like to correct some statements in the document:</p> <p>VISUAL IMPACT SITE AL2 P43 EASTON NESTON HOUSE AND GARDENS – GRADE I LISTED</p> <p>Attached are two shots of Greens Norton spire, one from the courtyard and one from the entrance door of the house taken</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. This has been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including views from Caldecote village and Public Rights of Way.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	<p>The visual link between Easton Neston House and Gardens has been addressed. The SPD will be amended to confirm that the heights are indicative</p>

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		<p>spring 2022. These show that the view of the spire is still stunning, definitely an 'eyecatcher'.</p> <p>The report states ..... " ..... a tree lined avenue in front of the house. This once provided a visual link from the House to the church in Greens Norton, although any relationship is largely severed by intervening development".</p> <p>The above evidence proves this to be incorrect and is indeed confirmed by SNC's own Conservation report below.  <a href="https://www.southnorthants.gov.uk/downloads/download/311/easton-neston">https://www.southnorthants.gov.uk/downloads/download/311/easton-neston</a></p> <p>This is the link to the Easton Neston Conservation Area Appraisal and Management Plan prepared by SNC and adopted in March 2018. It confirms that the view of the spire exists and contains photographs. For speed of reference please see:  Summary – Page 5  Page 22 – Figure 27 view of spire through gatepiers  Page 30 – again mentions view of the spire  Page 36 – eyecatcher</p> <p>Therefore any development that takes place on AL2 site must ensure there is absolutely no interference at all with the visual link that still exists. Additionally any landscape proposals to mitigate the visual impact of buildings must also be carefully considered so they do not interfere with the view from the Grade I listed house and gardens of Easton Neston to the spire at Greens Norton Church.</p> <p>SITE AL1 – SITE ASSESSMENT - P66 – BELL PLANTATION  Para 6.1 states ..... Buildings are relatively small in scale, ranging from 4 – 10 meters in height. The height of the tallest building is 6m to ridge, much smaller than identified in Barton Willmore's report. The buildings on this site are definitely small in nature and any future buildings on adjacent sites should be of a similar size and nature. In line with Local Plan 2.</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations,</p>	<p>and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details</p>



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		<p>2</p> <p>4 – LANDSCAPE AND VISUAL CONSIDERATIONS</p> <p>Visual Receptors – the report does mention that more work is needed on the visual receptors in terms of significance to views. However, no mention is made of the impact that will be made on Caldecote. There are many receptors that would need to be included – views from the A5 through Caldecote to Tiffield. There would be huge impact along the lane to Caldecote from the A5. On exiting the village along the lane to Tiffield the view on the rhs would be blighted. The rural nature of the footpath which runs from Caldecote to Tiffield (SB2/SA12) would also be totally lost by views of AL1 warehouses. The footpath that runs along the brook and the side of AL1 from Caldecote and along the side of the site (SB1) would be affected to a greater extent as it would run along the side of the warehouse. The buildings as proposed would ruin the rural character of the PROW and any joy to be gained from a walk. Great importance should be placed on including many more receptors. The road from Tiffield to the A43 (Donkey Lane) will lose the views to Greens Norton and the church spire. The AL1 site will impact massively on this lane. I cannot stress too highly the importance that must be placed on these additional receptors. When the impact of the developments was first discussed with local Councillors they admitted that Caldecote had been forgotten and a buffer zone should be created. This has still not been done and I fear. It is not just the views from houses that will be destroyed, it is the local lanes and footpaths that are enjoyed by residents that will be ruined for ever!</p> <p>POINTS THAT NEED ENFORCING</p> <p>1. Traffic Impact Assessments need to apply to all the AL sites and employ the same methods. They must be cumulative traffic assessments, not based on individual applications. They must</p>	<p>meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>also include the impact of the residential development at Towcester Vale.</p> <p>2. The Local Plan 2 allocated sites for small and medium sized units and that is what should be approved. Large units have been mentioned but this would introduce a new policy in the Local Plan 2 and this is unacceptable. There should therefore be no mention at all of large buildings. There is no context for this size of building.</p> <p>3. Comparison has been made with Swan Valley and the AL sites. There can be no comparison. The AL sites are rural in nature and AL1-AL3 at the gateway to the Roman Town of Towcester. This does not correspond at all to the M1 and other major warehouse sites adjacent to Swan Valley.</p> <p>4. No building should exceed the height of any existing building on a nearby site. The maximum ridge height should be 10m. The use of plateaux should be prohibited as this could increase the visual height of a building by 7m (as proposed on AL1). This is not acceptable and should not be allowed. There may be a suggestion that this is an environmentally preferable solution. It is not acceptable as the visual impact will far outweigh the benefit. Excess spoil should be removed from site. The detrimental effect of the extreme height should be taken into account and not the financial cost of removing spoil from the site which the developer will not want to play.</p> <p>3</p> <p>5. Environmentally all hard surfaces throughout all sites, other than roads, should be of a permeable nature, pavements etc.</p> <p>6. The maximum footprint of any building should be 5,000 m<sup>2</sup>, not 8,000 m<sup>2</sup> as suggested in the SPD. There should be no 'exceptional circumstances'. 5,000 m<sup>2</sup> would correspond with Silverstone Business Park and Silverstone Park.</p> <p>7. AL3 should be subject to the same SPD conditions for any future developments applied for within the site.</p>		

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		<p>8. Employment – warehouse development will NOT provide suitable employment for Towcester and other local residents. The skill set is not compatible with the local area and will only result in more, not less out-commuting. We are already aware that the M1 sites are importing workers from outside the area, Derby and even further. Warehouses do not provide skilled work and apprenticeships for local school leavers. We should be encouraging the development of highly skilled high tech operators, more in line with the educational standards of the local area.</p> <p>9. AL4 – site access has been overlooked. Silverstone was bypassed a number of years ago and this had greatly improved the environment and has removed heavy traffic from the village. Any traffic southbound from the site will have to go through the village. This is a detrimental step and should not be allowed. An alternative solution must be found. A school has been built along the road and this must not be affected by HGV pollution. The height of the buildings should be 7m as the local topography and rising land will make anything higher totally unacceptable visually.</p>		
SPD24 5	S Weaver South Northants Labour Party	<p>South Northants Labour Party are concerned that the draft SPD does not follow the South Northamptonshire Local Plan Part 2 (2020) which states the “aim to meet the demand for small and medium sized units by suitable land allocation”. The document refers to large units and so clearly attempts to subvert this plan. We believe this is in contravention of the Town and Country Planning Regulations (2012) because supplementary planning guidance cannot introduce new policy. We believe that the intention of the SN Local Plan Part 2 should be honoured in full and that only small and medium sized organisations that deliver the stated aims of the plan (13.1.5) should be given permitted development rights.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application</p>

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		<p>There are good reasons why the local plan should be followed. For example, the provision of large units could push small and medium sized business out of the area, which are essential to the economy of market town and rural areas.</p> <p>The definition of the size of a building also needs to consider the height of the building. There need to be clear limits on the height of buildings that consider the surroundings, views and existing heritage and landmarks. It is recommended that new buildings do not exceed the height of existing buildings in the locality.</p> <p>It is often the case that small and medium sized enterprises (SMEs) are defined as those with less than 250 employees. The lack of such a definition creates a loophole that large corporations can take advantage of and so develop on these sites. The size of enterprises/employee numbers needs to be written into the definition of building size. There is a need for a clearer definition of the mix of buildings that will be allowed and this mix should be suitable for each specific area rather than a vague statement.</p> <p>There is a need for West Northants Council to include in the proposal AL3 and future developments on that site. That developments have taken place should not restrict regulation of any future development or redevelopments.</p> <p>The proposals also do not consider the impact of the developments on traffic in the immediate and wider areas. There needs to be a traffic survey not just at each location but also one that looks at the cumulative effects of all of the AL sites and other nearby sites (for example, to include the 2 million square feet of warehousing at Fenny Stratford, 9 miles away from AL5), and the developments by the motorway junctions. The congestion around Tove roundabout and the Old Stratford roundabouts need to be specifically considered. There</p>	<p>further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on</p>	<p>stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with</p>

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		<p>also needs to be a consideration of how closures on the M1 are managed in the area.</p>	<p>highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>the general principles set out in the SPD.</p>
SPD24 6	R Sadler Marrons Hallam Land MGT Ltd	<p>These comments are provided on behalf of Hallam Land Management Limited (HLM). HLM is a strategic land and planning promotion company, and has a track record for successfully planning and delivering sustainable developments across the UK. HLM is promoting a strategic landholding to the north west of the A508 which forms part of Spatial Option 5b - Growth at Milton Keynes North West / Old Stratford identified in the Strategic Plan Spatial Options Consultation 2021. The following comments are made in respect of Development Framework AL5.</p> <p><input type="checkbox"/> HLM support the requirement for the allocation to provide new active travel connections that utilise the established PROW network and make improvements to the existing paths through the site, particularly to the western boundary and the underpass of the A508. Consideration should also be given to reclassifying footpath links as bridleways to support cycle access through the site and onwards towards Old Stratford,</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on</p>	<p>No changes necessary.</p>

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		<p>e.g. the link to the A508 underpass, RS16, and RS17 realigning within the site extent if necessary;</p> <p><input type="checkbox"/> Further consideration should be given to the location of the vehicle access into the allocation from the A508 as this may be better located closer to the northern boundary of the site to reduce the interaction of the junction with the Old Stratford Roundabout junction. In due course, the access location will of course need to be supported by</p> <p>2</p> <p>detailed modelling analysis and we suggest this takes into account future growth options to the north west of the A508;</p> <p><input type="checkbox"/> Reference should be made in the SPD to ensure that any access from the A508 should be designed so as not to preclude potential vehicular access from the junction into the land to the north west of the A508 in order to future proof its design; and</p> <p><input type="checkbox"/> Consideration could be given to safeguarding land along the A5 and A508 frontage to allow for future capacity improvements to those key transport routes.</p>	<p>highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the local plan preparation process, Duty to Cooperate discussions were held both with Milton Keynes and National Highways.</p>	
SPD24 7	V Hartley Litchborough Parish Council	<p>I am directed by Litchborough Parish Council ('LPC') to send you the following response to the Supplementary Planning Document for the Employment Site Allocations under the South Northamptonshire Local Plan No. 2, dated July 2022 and prepared by Barton Wilmore ('SPD').</p> <p>Extent of the Response</p> <p>Although LPC's response particularly addresses the proposals for the AL1 (Bell Plantation/DHL site) ('the AL1 site') it should be read as also addressing the issues surrounding the AL2 (Woolgrowers Services Hub site), the AL3(IM Properties site), the AL4 (Shack Barns Podium Developments site) and the AL5 (Furtho Pit Frontier Site).</p> <p>Statement</p> <p>Towcester is an attractive small historic market town. It is the oldest town in Northamptonshire occupying the site of the</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be</p>

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		<p>walled Roman town of Lactodorum. Development on Employment Land within and near to Towcester should reflect this. It needs to be relatively small in scale and built using appropriate materials.</p> <p>Employment land in Towcester should be developed to provide employment for people who live in the locality. This implies the need for small scale buildings suitable for a large number of smaller businesses. Large warehouses provide only minimal local employment and should be confined to the major warehouse parks around Northampton adjacent to junctions 15, 15A, 16 and 17 of the M1 motorway.</p> <p>In order that developments do not dominate/detract from the local landscape the height of the buildings should be limited to maximum of 12 meters (and preferably under 10 meters).</p> <p>Higher</p> <p>-2-</p> <p>buildings that dominate the local gently undulating landscape and spoil the views from the town and the surrounding countryside should not be permitted.</p> <p>Careful landscaping of each employment site is also an important consideration. Wherever possible, existing hedgerows and trees should be retained and new green spaces incorporated into the sites.</p> <p>Constraints of the South Northamptonshire Local Plan Part 2 When the South Northamptonshire Local Plan Part 2 ('the Local Plan') was adopted by the former South Northamptonshire Council in July 2020 the allocated employment sites were targeted for small to medium sized units. This was part of a strategy to reduce out commuting and keep skilled workers in the district. Policy EMP1 Supporting Skills makes this clear. Para. 13.1.5, pages 121 – 122 of the Local Plan states: '13.1.5 Strategic employment generation is focused through the WNJCS at Towcester and Brackley, Motorway junctions and at</p>	<p>stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and</p>	<p>undertaken to best shape a proposal for each site. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious</p>

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		<p>Silverstone. The district has 65 business parks and the new sites supported through the Part 2 Plan are intended to:</p> <p>South Northamptonshire Local Plan (Part 2) 122</p> <ul style="list-style-type: none"> <li>• Meet local demand and strengthen the rural economy;</li> <li>• Provide the ability to strengthen local supply chains;</li> <li>• Local flexibility and choice of locations;</li> <li>• Meet the demand for small and medium sized units and</li> <li>• Contribute to reducing the level of out commute'</li> </ul> <p>Para. 13.2.1, page 123, states that the Towcester allocation sites (i.e. AL1, AL2 and AL3) are:</p> <p>'...to facilitate some additional small scale employment opportunities to provide additional choice and opportunity for the growing population and to look to reduce out-commuting.'</p> <p>(emphasis supplied)</p> <p>Para 13.2.2 states:</p> <p>'All three sites offer suitable locations for a range of new small and medium sized business units including uses that are ancillary or complementary to existing or proposed B Class uses.' (emphasis supplied)</p> <p>At para 13.2.3 the Local Plan, when describing the AL1 site, states:</p> <p>'....represents an appropriate employment location for the provision of additional small and medium sized commercial buildings17' (emphasis supplied)</p> <p>The footnote 17 referred to states:</p> <p>'The usual definition of small and medium sized enterprises (SMEs) is any business with fewer than 250 employees.'</p> <p>Clearly, the aim of the Local Plan was to identify sites available for small and medium size operations. In common with many other consultees/objectors, we cannot understand why the WNC Planning</p> <p>-3-</p>	<p>strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner.</p>	<p>design standards. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>



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		<p>Officers did not discourage DHL from making its applications for the AL1 site by stressing the importance of that policy. DHL's applications and proposals for the AL1 site bear no relation to spirit or letter of the policy adopted in the Local Plan. During discussions the mix of use between B1, B2 and B8 on this site it was stated that the proposed mix of 95% B8 proposed by DHL was a true mix. This is egregious nonsense, a mix is 33/33/33%.</p> <p>The Local Plan also sought to address out commuting for work. The proposals for the AL1 site run contrary to that aim. Far from reducing the number of residents who live in the district and work outside of it the proposal will require non-resident, low skilled, pick &amp; pack workers to be bussed into the district. Any proposal providing for this should be refused as being non-compliant with the Local Plan' aims.</p> <p>LPC's Response to the SPD</p> <p>1. Definition of Small, Medium and Large Units</p> <p>The SPD defines a small unit as up to 2,500 m2 a medium size unit from 2,500 m2 to 8,000 m2 and a large unit as being greater than 8,000 m2</p> <p>The Local Plan provided for small and medium size buildings. The definition of large units at 8,000 m2 with no upper limit is unacceptable. The local precedent should be that no building should be larger than 5,000 m2.</p> <p>The Local Plan states that proposals need to be in keeping with the surroundings. The use of the Swan Valley strategic site on the M1 as a comparator for rural locations is inappropriate for a small market town such as Towcester. The AL1 site has industrial, retail and other units very near to it, these act as a very good comparators as to the size and scale of future employment development at the site which SNC envisaged when it adopted the Local Plan.</p> <p>2. Design Principles LPC recommends the SPD provides that:</p>		

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		<p>a) No building should be taller than any existing building on a nearby site (for the AL1 site this is the existing Bell Plantation complex) or higher than 12 metres AOD, whichever is the lesser height.</p> <p>b) The maximum ridge height of buildings be 10m AOD. That is the area precedent and would fit with the intent of the Local Plan for small and medium sized units.</p> <p>c) The use of balloons/height indicators, paid for by the developers, be asked for each application, as should the use of bunds to provide screening.</p> <p>d) If using treelines (etc.) to set heights that bunds with tree planting on the top are an unacceptable way to make the ridge height acceptable in planning terms.</p> <p>e) Tree maintenance on the site be made legally binding.</p> <p>-4-</p> <p>3. Keeping Services on Site In order to ensure that policy aims of the Local Plan are adhered to, the SPD should make clear that all services and attenuation for flooding (e.g. balancing pools) must be kept on site and within the allocation area. WNC must not allow the site to gradually creep in size by allowing services to be constructed adjacent to it.</p> <p>4. Prohibition of Unit Amalgamation The SPD should provide that future development at the AL1 site do not allow for the combining of two or more smaller units to create larger units.</p> <p>5. Site Limit for Single Buildings The SPD should provide that no one single building can take up more than 15% of the total area allocated in the Local Plan. This will keep the focus on the small and medium size principle and help prevent the combining of smaller units.</p> <p>6. Traffic Surveys</p>		

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		<p>LPC would like to see some guidance in the SPD on the need for a full and comprehensive traffic survey. The A5 (a single carriageway road) serves as the alternative route to the M1 when it is closed. This is a frequent occurrence with at least one incident on the M1 every two weeks. There is no coherent plan to cope with the additional traffic that the development of the AL1 site will generate, or for alleviating congestion on the already congested A43 Towcester Bypass immediately south of the site. In addition, consideration needs to be given to the traffic impact on the development of the site of construction works further south along the A5 corridor. There is currently a major warehouse development of 2,000,000 sq ft under construction at Fenny Stratford at the junction of the A5 with the A4146 south of Milton Keynes.</p> <p>In common with other consultees/objectors LPC questions the wisdom of WNC employing Barton Wilmore to prepare the SPD. It is understood that that DHL is one of their clients, it is inevitable that this gives rise to an apprehension of bias. LPC trusts that these views and recommendations will be incorporated into the final draft of the SPD and asks to be kept up to date with the progress of this document.</p>		
SD248	T Palmer	<p>This is a potential planning fiasco.</p> <p>The A43 is a major arterial road - it is chaotic in &amp; around Towcester for much of the day.</p> <p>Towcester A5 High St is plagued with pollution &amp; noise from a stream of cars &amp; lorries.</p> <p>The laughably so-called "relief road" which is simply to facilitate a huge housing development [a problem in itself] will not alleviate pressure on the High Street.</p> <p>Planning was granted for small &amp; medium sized business units &amp; this would benefit the town. These would develop organically &amp;</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of</p>

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		<p>would house the types of companies &amp; industry which Towcester needs - with quality jobs.  Mega warehouses are totally inappropriate for Towcester. The traffic generated by lorries, vans &amp; workers in the area would be catastrophic for our rural town.  In contrast, Brackley has a N/S &amp; E/W ring road &amp; far more business units &amp; industry than Towcester - these feed on &amp; off the bypasses. Brackley has NO mega-warehouses &amp; is thriving. The High Street is not infested with traffic.</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>the planning application process.</p>
SPD24 9	Wappenham Parish Council	<p>The main areas of concern from Wappenham Parish Council are:-  1. The wording for the Design Principles needs to be tighter, the SPD is currently littered with 'may', 'should', 'seek to', 'where possible', 'explore', 'look to', 'could' - all too vague and open to interpretation by the developers.  2. Employment offering: Remove 'in part' from page 24 para 3.2 and reinforce the importance of the 5 employment criteria of the Local Plan (2) and its aim "to attract new</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.  The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the</p>

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		<p>investment and provide more jobs to match the skills of local people” (page 20) which large scale, B8 warehousing fails to meet. The skills and education attainment of Towcester and South Northants are significantly higher than those of West Northants therefore employment emphasis should be on skilled, managerial and professional, high performance technology, which exploits our rich regional history of applied Research and Development in areas such as automotive advanced manufacturing. B8 risks lowering rather than raising aspirations.</p> <p>3. Modal Shift: The Local Plan aims to reduce out commuting and encourage pedestrian/cycle use to access work. B8 warehousing will not address this, indeed it will generate in-commuting from workers based outside the locality.</p> <p>4. Footprints:- Stress that the Local Plan (2) allocated these sites for ‘small and medium sized units’ and that is what should be built. Large Scale buildings will not be accepted on these sites. The SPD (page 39) defines ‘Large’ units as 8,000 sqm to infinity which is clearly unacceptable, but is also inadmissible as it introduces new policy. 5,000 sqm must be the maximum acceptable footprint on any site based on the local precedent. Also, smaller/medium buildings cannot be joined up at later dates to form larger units.</p> <p>5. Heights:- No building to be taller than any existing building on a nearby site, ie</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>application stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment</p>

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		<p>for AL1/2 this is site 4 (page 28 of the SDP) and for AL4 this is site 6/ Shacks Barn (page 30). Ridge heights should be no more than 10m AOD for AL1/2, and 7.5m AOD for AL4.*</p> <p>6. Context: Swan Valley, beside the M1, has no contextual consideration to a rural historic town like Towcester and should not be used as a precedent. NB Swan Valley is defined as a 'Strategic' development under the WNJCS, whereas the AL1-5 sites were specifically identified as 'non-strategic' for the purpose of Local Plan (2).</p> <p>7. Traffic: Greater detail is required in the SPD of a Cumulative Traffic Impact Assessment on the A5/A43, Tove/Abthorpe roundabouts and surrounding local roads; not just from the allocations but after the relief road is open; when the M1 is closed or has hold ups; the SUE Towcester Vale houses are completed, and once AL3 is operational. The SPD needs to require that any site applications must include cumulative traffic assessment, not just an assessment on the access for the specified proposal.</p> <p>8. AL3 – This site (Tiffield Lane) should also be subject to the same SPD conditions on future developments within that site. Importantly the heights already permitted on AL3 (21.5m building, therefore 27.5 AOD) must not be used by AL1/2/4 developers as existing precedent for their sites.</p>		<p>in line with the general principles set out in the SPD.</p>

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		<p>9. Screening using trees must be large scale and maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable screening.</p> <p>10. The importance of all the proposed buildings and associated infrastructure such as planting and SUDs (drainage) needs to be within the allocation site area (which is not the case for AL4).</p>		
SPD250	R Tyson	<p>REF: Shacks Barn, Bell Plantation and Woolgrowers Fields planning</p> <p>I work as a Design Researcher working on a number of environment projects which have informed the way I have reviewed the Shacks Barn, Bell Plantation and Woolgrowers Fields planning documents.</p> <p>If the plans go ahead as stated, the impact on the health and well-being of local people and the pressure on the environment and delicate eco-systems will heavily outweigh any commercial benefits.</p> <p>Future value, the need for clean water and air and high grade farm land for food production, with a reduction in carbon footprint is vital.</p> <p>The recent high temperatures are a red flag, creating DHL 24/7 365 days a year, logistics hub on 86 acres of land, units up to 21metres high (5 double decker buses) with heavy goods vehicles serving them is to ignore nature's warning signs.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change.</p>	<p>Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change.</p>

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		<p>Here are some basic facts -</p> <ol style="list-style-type: none"> <li>1. New research on food security finds that almost 14,500 hectares of England's best agricultural land been lost to development since 2010 - that's enough land to grow 250,000 tonnes of vegetables a year!</li> <li>2. There has been a hundred-fold increase in our best agricultural land lost to development.</li> <li>3. A staggering 60% of this prime farmland is also within areas at the highest risk of flooding.</li> <li>4. Lost of habitat. Hedgerows provide vital habitats for an array of wildlife, improve soil quality and capture carbon from the atmosphere. But nearly 50% of our hedgerows have been lost since the end of the Second World War. The hedgerow network needs to be increased by at least 40% by 2050 to bring bio-diversity levels into balance.</li> <li>5. It is the government responsibility to safeguard England's future food security with an effective land use strategy and new planning rules. A strategy that protects prime farmland and safeguards food security and health. The fast turn around, throw away, carbon driven economy is starting to slow down, with food prices rocketing the sensible investor will invest in land and good health</li> </ol>		
SPD25 1	J Binley	Towcester and Silverstone have over the last 50 years grown considerably and employment has generally been concentrated in many small and medium sized	The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local	The SPD will be amended to confirm that



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		<p>businesses with high skill levels and good opportunities for training and apprenticeships in high-technology careers. The local unemployment rate is much lower than many neighbouring towns and cities and there are few local people looking for low-skilled jobs.</p> <p>All site proposals are for small and medium sized business units, which have a good track record of high employment rate per m2 and generate higher skilled jobs than very large warehouse type businesses. As such these will encourage long term employment, up-skilling of the local workforce and occupations where local young people can find training and apprenticeships.</p> <p>Sites at AL1 to AL4 are linked or close to other small and medium sized business units which already have a good track record of bringing employment, economic input and high skill levels to the area. There is a current and growing demand (including from the electronics consultancy business I am employed by) for suitable and affordable small industrial or office units which would generate highly skilled employment opportunities nearby.</p> <p>All these sites are currently employing mostly local people, reducing in-commuting on roads which are already congested at peak times.</p> <p>It is essential for the sustainability of the lived-in environment locally and nationally</p>	<p>supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of</p>	<p>the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change. Additional wording has been added regarding AL3 to set out that</p>

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		<p>that steps are taken to assess the cumulative impact of all proposed developments on these sites and other local employment sites. This applies to health impacts and transport assessments, as well as habitat effects. So far it is unclear that any of the proposed developments on these sites have taken account of the cumulative effect of all sites on local traffic, health and sustainability. Therefore this should be considered and assessments of the cumulative impact should be made enforceable by local planning and national authorities. However, recent proposals and consultations on large storage and distribution facilities on AL1, AL3 and AL4 have raised concerns that the local planning is not able to distinguish or discriminate between small to medium sized high skilled developments and large storage and distribution sites with lower long-term skill bases and higher traffic and health impacts. The definitions in section 3 are therefore welcomed and essential, with 5,000m<sup>2</sup> being a reasonable definition for the upper limit of medium-sized business premises. 8,000m<sup>2</sup> is close to becoming a large business premises and more in keeping with sites such as Swan Valley in Northampton. In particular, the outline plans proposed by DHL for AL3 which suggest an extended</p>	<p>out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>warehouse facility do neither match the definition of small to medium sized businesses, nor is it likely to provide much in the way of high-skilled long term employment. The effect on the small and historic town of Towcester would be significant, with high likelihood of visibility from many key historic and visitor amenity sites, reducing the attractiveness and therefore visitor contribution to the local economy.</p> <p>During construction of these large storage and distribution facilities, significant employment in construction may be generated, but this is only short term. Large developments such as this also use significant carbon-producing resources, such as concrete and remove land which is currently absorbing CO2 due to plant growth. This increases the carbon footprint of the local economy at a time when we are all being urged to reduce it.</p> <p>Long term, it is often the case that insufficient workers can be found locally for work in these facilities. The tendency is for workers to be found in larger cities, many miles away, who drive in or are bussed in daily, with little input to the local economy. This also generates significant extra in-commuting, affecting the already congested roads. This has a consequent negative effect on visitor economy as people</p>		

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		<p>struggle to access local visitor attractions or are dissuaded by excessive traffic noise and pollution. The increase in CO2 emissions due to the in-commuting is also likely to worsen known climate change effects, locally as well as globally.</p> <p>It is clear from the descriptions in the planning documents that developers are including storage and distribution alongside smaller industrial, R&amp;D and commercial units, but they are not specifying the ratio or the balance between the types of units. This should be clarified and a limit on the larger units imposed to prevent over-large developments which contribute little to local employment and potentially have highly damaging impacts on local traffic conditions, with consequent health impacts for those living in close proximity to the most heavily congested routes.</p> <p>Recent trends for continuing expansion of warehousing, storage and distribution are unlikely to be continued in the long term if we are to achieve the sustainable and carbon-free economy that is a key goal of governments across the world including our own. Therefore the rapid and headlong increase in provision of these facilities is likely to end soon, particularly in the looming recession, leaving such sites mothballed or abandoned. The land is currently used for agriculture and recent</p>		

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		<p>events have shown that we need to increase our resilience as a country in food production, which is not possible unless we keep or even increase land used locally for agricultural purposes. Growing and processing food locally will also reduce carbon emissions and improve the prospects of achieving a net-zero economy by 2050.</p>		
SPD25 2	R Roberts	<p>I wish to express my concerns as follows:</p> <ul style="list-style-type: none"> <li>* concern about HGV traffic from Shacks Barn causing congestion in Silverstone, Whittlebury and on Cow Pastures Lane. Traffic will go past an infant and junior school in Silverstone as there is no southbound access on to the A43 from Shacks Barn.</li> <li>* The Local Plan allocated all sites for 'small and medium sized use. The SPD has added 'Large units' at 8,000 sqm with no limit.</li> <li>* The design and height of buildings needs to be suitable to the area. Bell Plantation is a good example of this.</li> <li>* Screening using trees must be large scale and maintained.</li> <li>* further details should be included on likely employment opportunities</li> </ul>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	

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SPD253	D Fitzroy	<p>1. The sites allocated in the South Northamptonshire Local Plan Part 2 were targeted for small to medium size units and this is referenced throughout the plan. The council's development brief clearly defines Small units as sized between 250m<sup>2</sup> - 2,500m<sup>2</sup> and Medium units sized units 2,500m<sup>2</sup> – 8,000m<sup>2</sup> . It is important that with implementation of this Local Plan , that planning approval for new units is kept firmly to these smaller sizes to avoid destroying what is left of local character, avoid overload already congested roads and to fulfil the policy aims of providing existing residents with skilled work opportunities and reduced commuter times. In addition , Local Plan Objective 9 "...conserve the tranquillity of the natural and built environment in South Northamptonshire " is not compatible with plans to build large warehouses proposed by DHL and , environmentally, the council should not be looking to approve large warehouses on any of these sites with more lorry journeys and related air pollution in supposedly rural areas.</p> <p>2. Clearly South Northamptonshire is an attractive location for logistics. But, Northamptonshire already has the highest density of warehousing in the UK and, according to Avison Young Real Estate, Northampton and Milton Keynes already have the</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The SPD has been prepared with the Local Plan 2 objectives.</p>	No changes necessary.

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		<p>lowest availability of warehouse staff among prime and secondary distribution locations.</p> <p>In Spring 2021, it was reported in the newspapers that ¾ of all warehousing jobs being advertised were for the Northampton area . A quick look online today at the long list of job advertisements for warehouse workers in the Northampton area confirms that this shortage continues. The only way they will be filled is to import yet more people into the area, requiring more cheap housing to be built and more investment in health and education facilities.</p> <p>At what point does this area reach saturation point for large warehouses units ? How much more heavy traffic can our roads take? Apart from the totally inappropriate DHL application, how many of the applications for new units are speculative rather than driven by real local business needs? Some traditional occupiers of large units are already looking at cheaper non-primary locations where there is larger labour pool and Savile's Real Estate report that 2/3 of online retailers plan to expand their logistics outside of traditional hubs so as to have smaller, more localised warehouses. If there is drift away from large units then, longer term, South Northamptonshire could be left a lot of white elephant buildings .</p> <p>3. AL5 Site The planning brief states that, given its access onto A508, the AL5 site ' may</p>		

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		<p>accommodate a mix of units given its access' which implies that large units are now being considered for this site. Even with the proposed new roundabout, increased lorry traffic would exacerbate the existing problem of traffic build up both southwards at the A508/Stony Stratford roundabout and northwards to the Junction15 of the M1. The A508 already cannot cope with the existing amount of traffic at peak times or when there is an accident on the M1 (which is very frequent). Additionally developments that increase the traffic burden on the A508 create more damage to the listed buildings and air pollution in the Conservation area of Grafton Regis which now desperately needs a by-pass. Local Plan Objective 9 - "...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings."</p> <p>West Northamptonshire Council needs to have higher ambitions than for the area to just be a giant logistics park . It should aspire to be the centre of excellence for selected businesses and industries , as has been achieved with the technology and engineering hub around Silverstone Creating a skilled, well qualified workforce through targeted educational and vocational opportunities would draw in companied willing to invest in the area and take up the smaller and medium sized units that the Local Plan2 envisaged</p>		



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		<p>. The Local Plan stated that it aimed to strengthen the rural economy and (Objective 1 ) "Deliver appropriate new employment opportunities. This means creating opportunities both for skilled, well paid workers (rather than more low paid warehouse jobs which cannot be filled) and through creating job opportunities in tourism and leisure ( Objective 3 ' to facilitate tourism and leisure related growth'. ) Giant warehouses do not facilitate tourism growth - quite the opposite.</p>		
SPD254	R Reason	<p>I was appalled to read that the supplementary development policy has diverged considerably from the original Local Plan and in detriment to the local area and population. The SPD needs to reinforce that the aim of the Local Plan is to attract new investment and provide more jobs to match the skills of local people. Currently it does not. I object to these business/warehouse sites being called 'employment sites' as it is well known that warehousing offers few jobs. Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. Currently there is no such detail.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway</p>	

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		<p>The Local Plan (2) allocated all these sites for 'small and medium sized units' and that is what should be built. The SPD has added 'Large units' and defines them as 8,000 sqm with no limit – that is clearly both unacceptable and outside of the remit of the Supplementary Planning Documents. 5,000 sqm is the maximum acceptable footprint on any site.</p>	<p>safety, or the residual cumulative impacts on the roads would be severe.</p>	
SPD25 5	P Palmer	<p>The idea of allowing planning permission for these warehouses is awoke!! We spend enough time queueing in traffic just to get to Towcester centre. What help will this be to the small businesses in the town. People will avoid shopping there and the centre will die. I totally object to the whole idea</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include</p>	No changes necessary.

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			improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.	
SPD25 6	B Stewart	<p>General Comments</p> <p>The introduction of a Supplementary Planning Document (SPD) for the development sites AL1, 2, 4 and 5 is welcome but with some scepticism. To allocate five large employment sites round Towcester without addressing the consequential need for traffic management is an inexcusable failure of responsibility. As is the historic failure to require the developers of the Southern Towcester extension to build a dual carriageway as a relief road – although even that that would only feed into a traffic jams on the A5 and A43, pushing traffic onto hopelessly inadequate and increasingly dangerous local roads.</p> <p>It can only be hoped that the WNC Planning Policy Committee will ensure that SPD mitigates the multiple problems (and distress) caused by inadequate drafting of the LP2 and by the inability of SNC/WNC planning to negotiate the submitted planning applications within the clearly expressed vision and objectives for Towcester town and its rural villages. It is to be hoped that AL3 can be influenced by the SPD because the alternative is for Towcester to be dominated by large scale inappropriate development and become a much less attractive place to live and work – let alone visit. The polar opposite of what was explicitly intended in the</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping . The SPD will be amended to</p>

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		<p>LP2 upon which we were consulted.</p> <p>General comments</p> <p>There are imprecise statements throughout that must be edited to remove otherwise the document becomes aspirational rather than directional and we already have evidence of the consequences of unclear drafting. Words such as 'where possible', 'explore', 'look to', 'could', 'may', 'should', 'seek to', must become positive statements e.g. 'will' 'must' etc to provide clear guidance to developers, planners and to protect the local community.</p> <p>The LP2 specified certain requirements for planning applications for the employment sites that have been largely ignored. For example paragraph 13.1.8 of the LP 2 states that a market evidenced study is expected on the proportion of B1, B2 and B8 proposed and that this shall be undertaken by an independent expert. It is not apparent that such reports as have been provided are independent.</p> <p>Paragraph 5.1.7 of LP2 sets out that the distribution of jobs for South Northamptonshire should be met through</p> <p>Renewal and regeneration of existing Employment</p> <p>High performance Technology Motorsport Cluster at Silverstone Circuit</p> <p>Local employment provision in the SUEs</p> <p>Tourism and visitor development in rural areas.</p> <p>There is no mention of large-scale warehousing being either a proposed use or proposed employment opportunity.</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>	<p>confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate</p>

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		<p>13.2.2 references the Towcester Master Plan vol2. That plan did not envisage the large scale developments now proposed or large units being developed over such a wide area. The paragraph references small and medium sized business units as being suitable for the land at Woolgrowers and Bell Plantation.</p> <p>Specific comments</p> <p>1.7. The SPD should state that sites AL1-4 were identified to facilitate non-strategic small scale employment opportunities to provide additional employment choice and opportunity and reduce out-commuting for the local population associated with the development south of Towcester. The planning applications submitted to date are not consistent with this requirement.</p> <p>South Northamptonshire's Economic Growth Strategy</p> <p>The 5 roles set out in the LP2 are very clearly to meet local demand. The SPD must to reinforce the importance of developments meeting all the 5 tests: meet local demand and strengthen the rural economy provide the ability to strengthen local supply chains local flexibility and choice of locations meet the demand for small and medium sized units contribute to reducing the level of out-commuting Warehousing. The document notes that delivering new space to cater for the warehousing sector on a trend-based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy. However, the current proposals for AL1-5 appear to be</p>		<p>imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent,</p>

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		<p>the opposite of what is deemed desirable with warehousing at the forefront of every planning application and very little indication of alternative uses – or even of genuine independent market need assessment nor of environmental impact. Research and Development. None of the current proposals for AL1-4 appear to meet the objective of building on local skills and experience in applied R&amp;D.</p> <p>Part 2 Local Plan 2.21 The LP2 made much of the vision of attracting new investment and providing more jobs to match the skills of local people and reducing out commuting. There is no evidence of demand in South Northants for low skilled warehousing jobs. In fact the reverse is true, with large scale warehousing developments alongside the M1 needing to bus people in from much further afield. There is very little affordable housing readily available locally, so increasing low skilled jobs that do not meet the needs of highly skilled, highly educated workforce will have the dual impact of increasing out-commuting and while increasing the numbers of people being bussed into the area.</p> <p>2.23. It was a requirement of the LP2 that planning applications for AL1-5 were to be supported by an independent study providing market led evidence on the proportion of B1, B2 and B8 uses to be delivered. I am more familiar with AL4 than with the other sites, but certainly this requirement was not met at the time of application as required under the LP2. It must be a</p>		<p>that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>requirement that the market evidence is truly independent and not focused solely on proving a need for warehousing which will be easy to accomplish pretty much anywhere in the country, but focuses instead on matching local skills with suitable industry uses.</p> <p>Socio-Economic Context  2.29 to 2.35 Emphasis needs to be placed in the SPD on the socio-economic context for Towcester and South Northants. South Northants' skills and educational attainment are significantly above those of the East Midlands and West Northants. It is stated to be prosperous with a highly skilled workforce, to have one of the lowest unemployment rates and a higher than average number of residents employed in managerial, professional and skilled occupations. These are the attributes the developments should be exploiting and this should be addressed in the SPD to reinforce the need to meet the vision and objectives set out in LP2.</p> <p>M1 Corridor – Scale, Form and Character  3.3-3.5 It is totally unclear why the authors of the SPD have used Swan Valley and other large scale developments along the M1 as a comparison to the developments sites round Towcester. Swan Valley and the area surrounding it bear no relation to the historic town of Towcester and its rural, undulating surroundings. Swan Valley is very large group of sites and was allocated for strategic employment sites whereas the sites round Towcester were clearly called for as nonstrategic.</p>		

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		<p>There is no established housing near Swan Valley and it is next to and has direct access to, the M1; a major arterial route. It largely consists of very large scale, predominantly distribution developments. Swan Valley does not set a precedent for Towcester. The only possible purpose for having used it as such would be to enable every developer requirement of the current planning applications for AL1-4.</p> <p>AL1 &amp; AL2 – Towcester A43 Junctions and AL4 Technology Park</p> <p>3.10 and 3.12-3.14 The SPD recognises that the scale of development at Old Greens Norton Road and Tove Valley Business Park varies between 350m2 and 5,000m2. At Silverstone Business Park and Silverstone Park the units vary between 250m2 and 5,000m2. The SPD also refers to a corridor of technology-related employment emerging along this stretch of the A43. What the SPD has not done adequately, if at all, is make the link between this type of employment and the size of units it proposes to define as being 'medium' and which are clearly intended to facilitate warehousing.</p> <p>Rural Setting North of A43</p> <p>The SPD references ' the ability to provide development whose form and scale considers/reflects the rural character of this area through built or landscape elements will enable a more gradual and sensitive transition from North Towcester to the surrounding countryside.' The SPD doesn't identify how warehousing units up to 8,000m2 or larger and the associated traffic load will</p>		



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		<p>help in any sense provide a 'sensitive transition'. Exactly what type of development would support the intent implicit in this reference?</p> <p>Towcester Northern Gateways</p> <p>3.20 This section is extremely concerning. The reference to large development units is introducing a new planning policy and is therefore contrary to the remit of an SPD (2.2). This was pointed out (by me) to the Planning Policy Committee and I understood that such references were to be removed. Equally this statement does not reflect the comments about the open and sensitive nature and of the area surrounding AL1 and AL2. The statement should read 'the delivery of some medium sized buildings alongside small development units.'</p> <p>3.22 We agree that the northern gateway acts as a key arrival point into the historic settlement of Towcester, which needs to be reflected in the design quality, scale and massing of AL1 and AL2. The SPD should also reference the surrounding villages Caldecote, Duncote, Greens Norton and Tiffield that are also important historic settlements that should receive equal weighting in terms of impact and see a similar level of design quality, scale and massing consideration as the town.</p> <p>Small, Medium and Large Unit Sizes</p> <p>The SPD's definition of small units as 250m2 to 2,500m2 is noted. However, there appears to be no justification for the definition of 'medium' sized units, other than quoting a totally irrelevant</p>		

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		<p>and dissimilar location. The definition of 'medium' units should be 2,500m<sup>2</sup> and 5,000m<sup>2</sup>, not 8,000m<sup>2</sup>. Tove Valley Park and Silverstone Park (the circuit) are referenced as local (and relevant) examples of medium sized buildings. The inclusion of Swan Valley as a reference precedent is completely incorrect as it in no way reflects buildings appropriate in scale, form and character that are local to the Towcester area.</p> <p>The inclusion of reference to large buildings should be clear that it is for comparison only. Large buildings should commence at 5,000 m<sup>2</sup>. Larger buildings above 5,000m<sup>2</sup> would dominate the landscape around Towcester and would enable uses that are not in keeping with the ambition to reduce out-commuting. Furthermore, if 5,000m<sup>2</sup> is deemed adequate in size for the technology related businesses at Silverstone Park (the circuit) then there can be no justification of positioning large units round the town where the traffic generated will be more of a problem. As already noted introducing large units is introducing a new planning policy, and not within the remit of the SPD.</p> <p>One of the major visual impacts for all these proposed developments is building height. The SPD should adopt a maximum height of 10 metres across sites AL1 and AL2, and 7.5m for AL4 (because of the topography).</p> <p>Landscape and Visual Consideration The authors note that it has not been possible to evaluate all of the sensitivity receptors and</p>		

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		<p>more work needs to be done on viewpoints. The viewpoints for AL4 do not range far enough as the site is visible for miles around. The viewpoints selected for all the sites only serve to illustrate the enormous detrimental impact inappropriate developments will could have on Towcester and surrounding villages. For AL4 the developer acknowledges that the development will be seen from 100% of viewpoints 100% of the time. This was entirely foreseeable when the site was allocated and it is incomprehensible that the site was thought to be suitable for anything other than low rise small scale units. The SPD should make it a requirement that all future applications include visual impact assessments based on the Sensitive Receptor/Viewpoint locations as a minimum and identify the mitigations that will ensure that the visual impact is minimal. The SPD fails to note that these developments, if allowed to have warehousing units functioning 24/7 will be lit at night and therefore not only be visible 4/7 but have a polluting effect on the night sky .</p> <p>Overarching Design Principles</p> <p>5.1 It is important that the design of buildings do respect the heritage of the area as required in the allocations. None of the planning applications submitted to date attempt to address this.</p> <p>5.3. The 12 general design principles are welcomed</p> <p>Bullet 2 – this needs to address the fact that development platforms are determined almost entirely by the size of building, especially on a sloping site. This is a concern for AL4 which is on</p>		

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		<p>ground that rises from the road level and is undulating.</p> <p>Bullet 7 –footpath, cycle and road networks to support and encourage sustainable travel are welcomed. For AL4 it appears to be assumed that the only place from which employees will be recruited is Towcester. The need to provide safe cycling paths and pedestrian routes from surrounding villages is completely ignored. Additionally, as already noted, distribution warehousing is likely to require a workforce from outside the Towcester which undermines the case for sustainable transport.</p> <p>Bullet 9 – we support the need for new active building frontage and decorative planting. The currently planning application for AL4 suggests that screening will be mature and effective after 15 years. This is clearly no acceptable and the SPD needs to address this with a statement that provides for much earlier screening and requires ongoing management and replacement of any failed growth.</p> <p>Bullet 12 – limiting the impact on tranquillity of each site's rural setting should also include operating times especially restricting the level of activity permitted between 7pm and 7am, including ensuring that light pollution is minimal.</p> <p>Additional point. Provide evidence of cumulative impacts on the wider road network, especially on the morning and evening rush hour on A43/A5 and when the M1 has problems.</p> <p>And also the impact on rural roads from drivers seeking alternative routes to avoid the</p>		

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		<p>frequent traffic jams – the current impact spreads from Weedon in the North to Buckingham in the South and all villages in between.</p> <p>Site AL1 Development Framework</p> <p>6.21 The proposal for new substantial landscape edges/buffers is welcomed. The SPD should specify a minimum depth for the buffers. Given the proposed building heights there should be a minimum bunding height of 7m along the northern boundary, or provision that the buildings are sunk so that their visual impact is minimised or removed.</p> <p>6.23 The siting of the football pitches is not defined in policy and they should be located along the northern boundary of the site as a buffer between Caldecote. It is not clear why sports pitches would be sited next to the very busy A43 dual carriageway with air pollution impacts. This seems very short sighted, not to say, perverse.</p> <p>6.25 A maximum building height of 10m should be applied in line with the maximum industrial building height in Towcester. Please remove the reference to large buildings as requested earlier.</p> <p>.</p> <p>Site AL2 Development Framework</p> <p>6.47 Building heights should be a maximum of 10 metres. Please remove the reference to large buildings as requested earlier.</p> <p>Site AL4 Development Framework</p> <p>6.60 It is most concerning that the SPD appears to ignore the problems with access to and from the AL4 site. There is NO southbound access on and off the A43 from the site. As a</p>		

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		<p>consequence, all south-bound traffic to and from the site including HGVs, will have to go through Silverstone village past two schools. The dualling of the A43 was intended to remove heavy traffic from the village; it seems perverse for land to be allocated that makes the return of heavy goods traffic through the village inevitable. The developers for this site acknowledged that 60% of all traffic will use this route and is highly likely that traffic will also take a short cut along the Whittlebury Road and Church Way into Whittlebury, a road that is totally unsuited to high traffic volumes and has a weight restriction for very good reason. Developers of the AL4 site need to provide evidence of cumulative impacts on the wider road network, on key junctions and roundabouts as well as assessing the impact on village and rural roads of increased traffic arising from the development. This must also include Cowpastures Lane from the A5 which is another obvious but dangerous short cut. The justification for this site was its proximity to Silverstone circuit and the technology based there. Given the lack of access via the A43 between the two sites, it should be clear that any warehousing should be located at the circuit where there is easy access on both sides of the dual carriageway and nearer to the point of manufacture. AL4 should be designated for small units only to limit the numbers of HGVs accessing the site.</p> <p>6.65 The maximum development height for AL4 should be 7.5 meters, not the 10-15 metres referenced. This is due to the local topography and the site's position on the</p>		

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		<p>Whittlewood/Yardley Ridge and in open countryside on rising land away from it to Whittlebury in particular. This height will help to limit the site's visual impact on Silverstone village, and on Whittlebury which is even more directly affected by the visual impact of the development and Abthorpe. As already noted, there need to be more sensitivity receptors, for instance from Abthorpe which is not shown on the map, from additional points on the Whittlebury Road and from PRowS between Whittlebury and Silverstone. This height will also restrict the uses on the site to those that require fewer HGVs and to uses that do not need to function 24/7.</p> <p>The maximum unit size for this development, given the access difficulties and other constraints, should be the existing development (1200m<sup>2</sup>) and Silverstone Fields (2,500m<sup>2</sup>).</p> <p>As already noted, the justification for AL4 was linked to the technology opportunities presented by its proximity to Silverstone circuit. There should therefore be no need at this site for warehousing, for which there is little or no demand from this type of highly advanced manufacturing. If indeed warehousing is needed to facilitate businesses at the Circuit then it should be located next to the circuit.</p> <p>There are inadequate references to footpaths and cycleways to facilitate travel to the site. The only proposed route is from Towcester using the Woodburcote road. There is no public transport provision to this site and the surrounding roads operate at the national speed limit</p>		

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		<p>making the route hazardous for pedestrians (there are no footpaths) and cyclists. The potential for traffic to spill onto surrounding dangerous routes such as Cowpastures Lane is not addressed.</p> <p>6.66 please remove this section and in particular the reference to large buildings for the reasons stated earlier in this response.</p> <p>Exemplar Development This section is welcomed since it exemplifies that approach that should be adopted by all new major developments. It would be helpful if WNC encourages developers to adopt these four key requirements as fundamental to their design process.</p>		
SPD257	M Phillips	<p>AL5 – Land at Former Furtho Pit, Old Stratford/Cosgrove I would like to object to the proposed development of the above site on the following grounds:</p> <p>1. Impact on the highway network The development is situated adjacent to the A508 single carriageway road and close to the Old Stratford roundabout. The A508 is already a busy road, particularly during peak periods, and traffic is likely to increase (lorries particularly) once the rail freight terminal at J15 of the M1 is completed. The Old Stratford roundabout is already identified as a pinch-point with the volume of traffic at peak periods from the A5 northbound from Milton Keynes, A5 southbound from Towcester, A422 and A508. Other proposed developments, if completed, in the Deanshanger and Towcester areas will only exacerbate this issue. Consideration must be given to the fact that only a few years ago a considerable amount of money was spent to improve the traffic flows on</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>



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		<p>the roundabout and it did have some effect. By allowing this development will only negate the traffic easing works which were done. The likelihood therefore of any further money being spent to improve the road network must be considered as unlikely. At times when there are issues on the M1, traffic around the roundabout can be extremely busy, particularly with HGVs.</p> <p>The proposed access to the development is via a new roundabout between the Old Stratford roundabout and the first Cosgrove entry road (Northampton Road). Due to the short distance between the Old Stratford roundabout and the proposed new roundabout, this is very likely to result in tailbacks blocking the Old Stratford roundabout at busy periods. Construction of this access will also result in enormous disruption and inconvenience for Cosgrove residents and anyone else using the A508. If this proposed new roundabout does not go ahead, how will traffic safely access the development?</p> <p>2. Impact on local residents</p> <p>The proposed development will unfavourably impact the residents of Cosgrove and particularly the residents of Stratford Road. The size of the proposed warehousing/offices will dwarf the adjacent properties and, with proposed 24-hour operation, will result in considerable disturbance from noise and light pollution. It will completely change the character of this rural area, causing loss of habitat and destruction of trees as well as loss of residential amenity.</p>	<p>impacts on the roads would be severe.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include matters such as ecology.</p>	

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		<p>It is noted that an area of the development adjacent to the A5 dual carriageway is proposed to be set aside for a country park – what use is this to the residents of Cosgrove? It would be better situated opposite the residential properties in Stratford Road.</p> <p>3. Impact on wildlife 4. Need for this development</p> <p>There are already many warehouse developments in progress in Milton Keynes, notably one large one at the further end of the A5 dual carriageway, one at Towcester and the rail freight depot at M1 J15. There are also numerous warehouse developments in the Milton Keynes area which have vacant warehouses up for rent. Is there really a requirement for a further development here?</p>		
SPD258	T Pace	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: The developments cannot be considered in the same way as the Swan Valley development. This is a residential area, small villages and communities where people live.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer:</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken</p>

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		<p>Again large units of up to 8000m2 have no place in a rural area near small villages There should be a limit of 5000m2 and a restriction on height of 10m maximum ridge height.</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Large units and a unrestricted height up to 16m. This will lead to light pollution and dramatically alter the landscape with units being seen for miles. No amount of screening will cover this. Again this is not the place for such large scale development. The roads struggle to cope at the moment with heavy congestion on the A43 every day going North towards the M1 and in and around the A5. Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer: Additional traffic in an area already congested every day causing noise and air pollution. Light pollution from the lighting of units 24/7.</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>to best shape a proposal for each site. Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

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		<p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Units too big 8000m2 and high 16m. Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: Units too big not comparable to Circuit development. 8000m2 Height of 15m proposed. These will be visible for miles causing light pollution and increasing HGV traffic in an already congested area through a small village</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Not Answered Please provide comments to support your answer:</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site</p>		

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		<p>should be considered?  Not Answered  Please provide comments to support your answer:  Any other comments  14 Are there any other comments you wish to make which you have not already made?  Are there any other comments you wish to make which you haven't already made?:  Increased noise, air, light pollution from the traffic that will be entering this area daily is unacceptable. A traffic assessment of all sites must be undertaken particularly in relation to Shacks Barn and HGVs using the A413 through the village to reach its destination as there is no direct access from the A43.</p> <p>Via Email  I wish to object to the following development proposals:  Shacks Barn  Bell Plantation  Wool growers Field  Traffic  Traffic in and around Towcester causes congestion on a daily basis. The A43 Northbound regularly stacks back to the Silverstone junction from the Tove/Abthorpe roundabouts. The A5 is constantly used as a diversion for the M1 from MK to Towcester bringing huge HGVs into the town causing pollution and dangerous air pollution levels. So much so that residents living in and around the high street have received warnings from the council that</p>		

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		<p>levels could affect their health. The new road from the A5 will not change this as the majority of traffic is travelling North towards the M1. We moved to Silverstone 20 years ago and the change in traffic on the A43 since then is dramatic. We can no longer sleep with our windows open due to the drone of heavy vehicles at night. The plan for the Shacks Barn development is incredibly worrying for residents of Silverstone. Air and noise pollution will increase with HGVs and other vehicles using the village road A413 off the A43 to reach the development when travelling North. This is no place for such a large scale development this is a rural space. Why build a bypass for the village all those years ago only to let commercial traffic back into the village years later. The affects of air pollution are well documented including health problems in children. The traffic for Shacks Barn would pass by two schools a primary and SEND school. The constant noise of traffic causes stress and anxiety has adverse affects on mental health. Residents will be subject to this on a 24hr basis. There needs to be a cumulative traffic assessment carried out for all proposed sites which properly considers the affect on the rural villages of Silverstone, Whittlebury and Towcester. This needs to take into consideration the traffic as it is today and when the new road is built. More development leads to increased traffic.</p>		

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		<p>Entry to Towcester onto the A5 from the Tove roundabout is always congested now. I cannot understand how more traffic particularly HGVs can even be considered.</p> <p><b>Building Size</b> The original plan allowed for small and medium size units only. The draft SPD is now introducing large units over 8000 m2 and over with no top limit. The maximum limit at the Circuit is 5000m2. This should be the same on all developments. We are a rural area and bear no similarity to the Swan Valley site made reference to. People live here in small communities.</p> <p><b>Height</b> Similarly the height of developments is important so not to blight an area again remembering it is a residential area (Silverstone, Whittlebury and Towcester). Light pollution and building heights of up to 15/16 metres will dramatically change the landscape with lighting on 24/7. These developments will be visible for miles. A recommended maximum ridge height of 10metres should be enforced.</p>		
SPD259	F Knight	<p>As a resident of , I am writing to you to voice my concerns over the above development proposals. The planning documents for these developments all indicate that the impact of increased traffic flow to these developments has been considered. These surveys appear to have been</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise</p>

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		<p>carried out on the developments on an individual basis, considering each development in isolation which surely makes no sense at all. Furthermore, my recent experiences of the traffic around the Tove island when both the M40 and M1 were subject to delays has reminded me that the current road system is clearly inadequate and that 3 new developments will only exacerbate the problem. As the motorway network is usually disrupted somewhere at least once a week, this is not a trivial issue.</p> <p>The regular night closures on the A43 and A5 together with occasional daytime disruption force the dual carriageway traffic along the A413 causing constant destruction of the road surfaces as traffic unsuited to country roads has to travel along them. With the proposed developments this will surely cause even more disruption. How the Shaks Barn traffic will reach the A43 without travelling through Silverstone village or along the A413 is not clear as clearly this traffic cannot be expected to travel through Silverstone village or along the A5 to the motorway network.</p> <p>There is also the issue of the additional traffic as the workers commute to these sites. There seems to be no provision for a segregated cycle routes between Silverstone, Whittlebury and Greens Norton for local workers to cycle safely to work or indeed for others to cycle into Towcester. My understanding is that all developments are now required to consider</p>	<p>implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>and light are considered as part of the planning application process.</p>



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		<p>and support active transport networks.</p> <p>In summary, in my opinion, the combined increase in traffic levels, necessary cycle infrastructure and light pollution associated with these developments do not seem to have been adequately considered in the planning documents.</p>		
SPD260	B Edwards	<p>am against the proposed developments at Shacks Barn, Bell Plantation and Woolgrowers field and I want WNC to protect our region from these developers. The SPD should require that a cumulative traffic assessment be carried out for ALL sites. We all know how congested the Towcester roundabouts become and that our villages are used as rat runs. We are very concerned that large numbers of HGVs will be using the A413 through Silverstone. They will pass right by the infant and junior school and along the route of many walking to school children what impact will their emissions have on their health?</p> <p>The original local plan allowed for small and medium size units only. The draft SPD is introducing large units. This means 8,000m<sup>2</sup> and over, with no top limit. The max size at the circuit is 5,000m<sup>2</sup>. We want the SPD to ensure that only small and medium size units are built and that the maximum size is 5,000m<sup>2</sup>.</p> <p>The SPD has introduced specific building heights. At Shacks Barn this is up to 15m high, Bell Plantation is up to 16m (but built on 7m high platform) and Woolgrowers is 12m. No amount of planting will hide any of these, the buildings will be illuminated 24/7 and visible for miles. The existing highest building locally is 9.5m. We want all the new builds to have a maximum ridge height of 10m. Please listen and represent the local people who live here and not the developer.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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			<p>improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	
SPD26 1	C Mason	<p>As a resident it would, at first sight, appear the proposal to over develop Shacks Barn (AL4) is the one that would potentially affect me the/the villagers the most. However, you cannot consider this in isolation – it has to be part of a Cumulative Impact Assessment – particularly when considering the increase in traffic resulting from the development of AL1, AL2, AL3 and AL4.</p> <p>The most obvious thing to say about the AL4 proposal is that, with planning permission for warehousing already in place at Silverstone Park – a mile down the road – a second such development at Shacks Barn is both unwarranted and unwanted! Silverstone Park has more warehousing capacity</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application</p>

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		<p>with more associated job opportunities than is ever likely to be needed for the area.</p> <p>Moreover, if you drill down through the so-called reports provided by the developer's agents regarding the environmental and traffic impact of this proposed development, they are complete works of fiction!</p> <p>I absolutely object to the proposal on the following grounds:</p> <ul style="list-style-type: none"> <li>• There is no direct southbound access/egress to/from the A43 from AL4. We are told that all southbound traffic leaving the site will be directed northbound to the McDonalds roundabout in order to perform a U-turn and return on the A43 directly past AL4 and traffic coming from the south will be doing the same thing. That is never going to happen for a number of reasons - 1) The cost of the additional fuel. 2) The fact that the traffic build up at that roundabout (even now, before the Towcester relief road dumps its traffic between the on ramp and McDonalds) is going to cost considerable time. 3) Sheer laziness. [And although this won't be a consideration, there will be considerably increased pollution emanating from lorries stuck in endless traffic jams.] It goes without saying that AL4 is totally unsuited to HGV traffic – whilst there are currently some large trucks on the site, these are connected to race teams with limited movement.</li> <li>• Lorries will therefore inevitably turn left at the second part of the dumbbell roundabout and proceed along the A413 and through Silverstone Village to access the A43 from the far side of the village. In doing so, they will pass not one but two educational establishments and right past the doorstep of the village school.</li> <li>• The footpaths alongside the A413 through the village have recently been widened to encourage families to walk their children to school for the sake of their health. Their health will be adversely affected by the pollution from the additional heavy</li> </ul>	<p>an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>stage will need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with</p>

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		<p>traffic – as will that of those whose houses front/back onto that road.</p> <ul style="list-style-type: none"> <li>• Whilst the majority of the village houses are centred around the heart of the village, to the right of the A413 (coming away from AL4), there are some 400-500 houses to the left. Having the A413 used as a rat run by HGVs, LGVs and vans will cut the village in two – a wholly unacceptable situation when you consider that 75%-80% of those houses are occupied by families with children who will have to cross the road in order to access the centre of the village.</li> <li>• When the traffic builds/snarls up along the A413, drivers of all types of vehicles will inevitably be encouraged to use the village roads in order to speed up their journeys so the entire village will be affected by increased pollution.</li> <li>• As things stand, as the day progresses into mid to late afternoon, there is a considerable traffic build up towards the McDonalds and A5 roundabouts. This is now, without the addition of the relief road traffic and that from the Towcester Vale housing development. When they are added to the mix, this heavy traffic is going to be happening throughout the day – particularly when there is a problem on the M1. That is going to be magnified by the HGV traffic from AL4 and the residents of Silverstone (and possibly Syresham) are going to become prisoners in our own homes and are going to have difficulty accessing our registered medical support in Towcester. We are also going to find it difficult to access the shops and services in Towcester and it will only be a matter of time before we take the route of least resistance and 'frequent' Brackley or Buckingham in order to service our needs. This will not only have a detrimental on Towcester, it will also increase pollution because of the increased mileage.</li> <li>• When the Local Plan (2) allocated AL4 for further development it was for 'small and medium sized units' and that</li> </ul>		<p>the general principles set out in the SPD.</p>

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		<p>is all that should be built. The SPD for AL4 has added 'large units', defined as 8,000 m2 with no limit when the maximum acceptable footprint should be no more than 5,000 m2</p> <ul style="list-style-type: none"> <li>• Precedents outside our area are being cited – these have nothing to do with our own rural area.</li> <li>• 15m high warehousing has no place in a rural setting – especially on a ridge.</li> <li>• Large scale warehousing will need to be lit 24/7, which will have a negative impact on the local environment and wildlife.</li> </ul> <p>In summary, the Shacks Barn/Podium is not needed and should NOT happen – there is plenty of provision for everything the developer wants to do there just down the road at Silverstone.</p>		
SPD26 2	C Grant	<p>AL3 : I strenuously object to the edict that the Supplementary Planning Guidance document does not include AL3, IM Properties development at Tiffield Lane. This is a bitter disappointment and very much detrimental to the interests of the people and the town of Towcester.</p> <p>Hulcote Roundabout : In respect of the Barton Willmore document – perhaps someone could advise why the roundabout shown at the Hulcote turn (Figure 1) has moved from the original plans which showed the roundabout itself exiting onto the Northampton Road at the same point as the existing junction. The Barton Willmore plan shows that the roundabout has moved slightly east along the A43 closer to Third Lodge.</p> <p>Traffic Study : I am unclear why a cumulative Traffic Study can not be produced to cover all the sites to show a clear and transparent picture of what the situation will really be on our road</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. The exact access will be determined as part of the planning application process.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on</p>	<p>Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details</p>

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		<p>network once all the AL developments have been realised, along with proposed development at Jack's café and the retail development behind Tescos and further development at Junction 15a.</p> <p>Just last week an incident on the M1 caused traffic on the A43 to crawl through Towcester, the Northampton Road, A43 and the A5 were affected for hours. And this is before you will be adding all these other developments. An honest and open Traffic Study surely is required before it is too late.</p> <p>Warehouse Unit Footprints : Do not allow units over 5,000m2. The original Local Plan allowed for small and medium units - do not allow this to be exceeded.</p> <p>Ridge Heights : Do not allow ridge heights exceeding 10m.</p>	<p>highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>will be subject to a further impact assessment in line with the general principles set out in the SPD.</p> <p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

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SPD263	A Gray	<p>1. INTENT AND PRECEDENT SETTING</p> <p>This SPD is intended to bring forward supplementary guidance that will clarify the intent and wording of the Local Plan. It is deemed necessary because WNC planners have, since the LP became effective, failed to enforce the spirit, intent and - indeed - many of the vision, objectives and policy conditions of that plan, these having been subjugated to a non-quantified, largely subjective interpretation of 'economic benefit' attaching to largescale development proposals such as AL3. This has enabled developers to propose speculative, very large-scale development plans that were not in view when the related allocations were inserted in the LP2 at a very late stage of the LP approval process, and that significantly challenge plan intent. WNC MUST ENSURE THAT THE FINAL WORDING OF THIS DOCUMENT MAKES CLEAR, WITHOUT AMBIGUITY, THAT AGREED VISION, OBJECTIVE AND POLICY CONDITIONS WILL BE APPLIED TO PROPOSALS IN A WAY THAT IS SYMPATHETIC TO THEIR LOCATION AND DRAW ON, RATHER THAN CHANGE, RELEVANT AND EXISTING PRECEDENT AS ILLUSTRATED AT THE 60+ EXISTING RURAL BUSINESS PARKS WITHIN THE REGION - AND, IN THE CASE OF AL1-5, NOT WHOLLY UNRELATABLE DEVELOPMENTS AT MOTORWAY HUB OR</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well</p>

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		<p>URBAN SETTINGS.            2. SIZE DEFINITION AND PRECEDENT (p.38/39)            The original Local Plan was intended for small and medium sized units, with large units not clearly in view or desired or considered applicable in the local context.            Ref: 1.7, the SPD needs to emphasise that sites AL1-4 were identified to facilitate non-strategic small scale employment opportunities to provide additional choice and opportunity for the growing population associated with the strategic development site to the south of Towcester.            Page 24, para 3.2 'In part' must be removed from the role of the employment sites wording. These sites were never intended only as 'in part' for small, medium developments, indeed wording for the land allocations in the LP2 (page 121-122) is "to meet the demand for small and medium units".            Therefore there can be no 'exceptional circumstances' (page 38) where large units will be acceptable on AL1-4.            The SPD is helpful in its definition of 'small' and 'medium', but 'large' should not be introduced (2.8/ 2.9 and elsewhere - is this not a policy addition?) and size definitions veer away from relevant local precedent by incorporating the motorway node site of Swan Valley (Page 24 3.3-3.5).</p>	<p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.            A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy.            Local Plan Part 2 requires planning applications to be supported by an independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and</p>	<p>as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>



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		<p>For rural service centres, relevant precedent is represented by a range of local developments. In 3.10 and 3.12-3.14 the SPD recognises that the scale of development at Old Greens Norton Road and Tove Valley Business Park varies between 350sqm and 5,000msqm. At the significant strategic development at Silverstone Business Park the units are sympathetically arranged in a cluster of units between 250m2 and 5,000m2. No unit exceeds 5,000sqm. The SPD acknowledges that there is a corridor of technology-related employment emerging along this stretch of the A43. There is considerable scope for the technology corridor to extend from Silverstone to the Towcester Northern Gateway – an approach which has a far closer fit with the skills and educational attainment levels in the area. The SPD suggests that units over 8,000 m2 could be built on all the sites “in exceptional circumstances”. We need to have this option and ambiguity removed.</p> <p>5,000m2 IS THE APPLICABLE PRECEDENT FOR THE UPPER LIMIT OF MEDIUM SIZED UNITS, HENCE THE MAXIMUM FOOTPRINT FOR MEDIUM UNITS SHOULD BE SET AT 5,000m2 CREATING NON-STRATEGIC, SMALL-SCALE EMPLOYMENT</p>	<p>nature to an existing or proposed B class use</p>	<p>Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.</p>

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		<p>OPPORTUNITIES. THERE SHOULD BE NO NEW PROVISION FOR LARGE UNITS, PARTICULARLY IN THE ABSENCE OF DEFINITION OF "EXCEPTIONAL CIRCUMSTANCES".</p> <p>THE SPD SHOULD PROMOTE AND GIVE PREFERENCE TO THE OPPORTUNITIES THAT TECHNOLOGY RELATED DEVELOPMENT PRESENTS FOR RURAL CENTRES INCLUDING TOWCESTER.</p> <p>3. HIERARCHY OF PLANNING ASSESSMENT CONSIDERATIONS</p> <p>The Local Plan was quite clear in its requirement for employment allocations producing small &amp; medium sized developments, serving the needs of SME (the latter defined). The AL1-5 allocations incorporated the word "mix" which introduced opportunity for developers and appears to have 'trumped' the 'small' and 'medium' requirement. A mix of unit sizes and uses, whilst understandable, should not be allowed to extend to unit types/sizes (i.e. B8) that override the primary requirement for modestly sized units that suit the environment and the local employment base. THE SPD MUST INCLUDE WORDING THAT MAINTAINS THE EXISTING REQUIREMENT FOR DEFINED SMALL AND MEDIUM (NOT LARGE) DEVELOPMENTS SUITED TO SMEs AND MAKES ANY 'MIX' CONSIDERATIONS SUBSERVIENT TO THAT REQUIREMENT.</p>		

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		<p>4. SCOPE OF SPD  Employment allocations AL1, AL2, AL4 and AL5 are the stated subject of the SPD.  The SPD was notified to the Strategic Planning Committee on 27/01/2022 and the IM Properties proposal at AL3 was not given planning consent until 23rd June 2022 following DLU review on call-in, when drafting of the SPD was virtually complete. It is arguable whether the IM Properties proposal should be covered by this SPD, but the AL3 allocation certainly should be, given the potential for revised or lapsed planning applications. The AL3 omission has exposed WNC to the real risk that developers of A1/2/4 will cite AL3 as the existing precedent for their proposals.  GIVEN THAT THE INTENTION OF THIS DOCUMENT IS TO CLARIFY INITIAL PURPOSE OF THE LOCAL PLAN, THEN THIS SPD: SHOULD APPLY TO ANY DEVELOPMENT PROPOSAL SUBMITTED TO WNC AND NOT SIMPLY TO THOSE STATED SHOULD ABSOLUTELY APPLY TO THE AL3 ALLOCATION IN RESPECT OF ANY CHANGED OR FUTURE DEVELOPMENT PROPOSALS THAT MAY COME FORWARD ON THAT SITE THE SPD MUST CLARIFY WNC'S POSITION ON STRATEGIC ALLOCATIONS TO CATER FOR THE POSSIBILITY THAT DEVELOPERS MAY SEEK TO DEVELOP ADJOINING ALLOCATIONS AS A CONTIGUOUS DEVELOPMENT SITE, AND FURTHERMORE</p>		

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		<p>IT IS VITAL THAT PROVISION IS MADE IN THE SPD TO ENSURE THAT THIS CANNOT HAPPEN.</p> <p>5. TRAFFIC IMPACTS</p> <p>Recent pinch point funding at the Abthorpe and Tove roundabouts was intended to mitigate issues with congestion at those problem areas pre-construction of the SUE, and already has failed. The Persimmon Relief Road is little more than an SUE estate road, upon which great expectations are being placed for congestion alleviation and positive pollution impacts on the centre of Towcester. Excluding AL1-5 development proposals, it may have a positive impact on Towcester. This road was never intended to be a conduit for mass development north of Towcester. The very many major development sites operational, under development or proposed in the West Northants area, including AL3, which received approval earlier this year, will negatively affect the character of Towcester and surrounding areas, while simultaneously increasing traffic on local roads as well as the major roads network, undoing any good work created by the relief road and creating a temptation to 'bypass the bypass', thereby once again negatively impacting congestion and air quality. I understand that Persimmon has committed to delivering the relief road by Spring</p>		

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		<p>2023 (surely an optimistic target given current status and absence of confirmation to National Highways). This piece of infrastructure development must be confirmed in the SPD to be an essential upgrade that must be completed before any other construction activity on AL1-5, or indeed any change in approach at Junction 15 SEGRO, can take place. HOLISTIC TRAFFIC MODELLING CONDUCTED ON A CONSISTENT AND CUMULATIVE BASIS ACROSS ALL DEVELOPMENT SITES, WITH INPUT, AGREEMENT AND SIGN-OFF FROM ALL OF WNC HIGHWAYS, NATIONAL HIGHWAYS, NORTHAMPTONSHIRE POLICE AND WEST NORTHAMPTONSHIRE COUNCIL, AND THAT PROVES THAT NEITHER THE LOCAL NOR STRATEGIC ROAD NETWORK WILL BE ADVERSELY IMPACTED BY PROPOSED DEVELOPMENTS (PLURAL), MUST BE INCLUDED AS A CONDITION OF ANY PLANNING APPROVAL.</p> <p>6. ROBUSTNESS OF LANGUAGE AND CONDITIONS  The SPD seeks to reduce “uncertainty” and ‘provide a robust and clear development framework’, and here is a certain tightening up in places, but there is equally loose wording and lack of definition that allows for developer interpretation. It is precisely this weakness that has led to the catastrophic outcome at AL3 and proposed catastrophes at</p>		

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		<p>AL1,2,4,5. LANGUAGE NEEDS TO BE TIGHTENED TO REMOVE ANY AMBIGUITY.</p> <p>7. ROBUSTNESS OF SUSTAINABILITY POLICY The LP carries little of real substance on the broad theme of sustainability and the specific themes of carbon reduction and modal shift. WNC SHOULD TAKE THIS OPPORTUNITY TO REINFORCE A FORWARD-LOOKING STANCE ON SUSTAINABILITY, CARBON REDUCTION EXPECTATIONS AND MODAL SHIFT, INCLUDING MORE PRESCRIPTIVE REQUIREMENTS REGARDING HOW THE 40% MODAL SHIFT TARGET FOR THE SUE IS TO BE DELIVERED IN COMBINATION WITH AL1-5 DEVELOPMENTS AND THEIR PUBLIC TRANSPORT PROVISION .</p> <p>8. ECONOMIC GROWTH STRATEGY It is good to see reference in the SPD to the acknowledgement that "delivering new space to cater for the warehousing sector on a trend-based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy". The current proposals for AL1/2/3/4 sites are completely trend-driven with no provision for future growth requirements. Analytical methods need to be employed within WNC to assess need versus provision and strategic placement of provision: AL3 indicates that this is absent.</p>		

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		<p>9. JOBS CREATION FOR LOCAL PEOPLE  The IM Properties proposal at AL3 was slated (in application documents) as providing 1,500 jobs for local people. In reality we now believe (from later statements from the developer at committee meetings) that the number of jobs is likely to be significantly lower. If warehousing predominates then we know that there is a poor skills match with the local employment base). Page 21 outlines very clearly why the jobs provided by B8 warehousing will not meet the skill set and educational attainment of the locality. It should be a requirement that the developers set out the actual jobs likely to be created and the anticipated skill levels (e.g. NVQ Level), not just broad statements on possible types of jobs. THE SPD SHOULD INCLUDE A REQUIREMENT FOR DEVELOPERS TO PROVIDE CLEAR STATEMENTS ON THE NUMBER AND TYPES OF JOBS TO BE CREATED FOR LOCAL PEOPLE AND FURTHERMORE THE SPD SHOULD INCLUDE A % RESTRICTION ON THE AMOUNT OF IN-COMMUTING. CAN ECONOMIC SANCTIONS BE IMPOSED FOR NON-COMPLIANCE?</p> <p>10. LP - MEETING LOCAL DEMAND  Page 20 para 2.22 The SPD describes very clearly the roles set out in Part 2 of the Local Plan to ensure that developments meet local demand. THE SPD MUST REINFORCE</p>		

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		<p>THE IMPORTANCE OF DEVELOPMENTS MEETING ALL TESTS, NAMELY:  Meet local demand and strengthen the rural economy;  Provide the ability to strengthen local supply chains;  Local flexibility and choice of locations;  Meet the demand for small and medium sized units; and contribute to reducing the level of out-commuting.  In 2.23, the employment sites “are to be accompanied and supported by an independent study providing market led evidence on the proportion of B1, B2 and B8 use to be delivered”.</p> <p>THE SPD MUST REQUIRE THAT ANY STUDY EVIDENCING DEMAND IS BOTH CURRENT AND TRULY INDEPENDENT, i.e. COMMISSIONED BY WNC. THIS DOCUMENT MUST MAKE PROVISION FOR REPORTS WHICH OPINE ON THE PRESENCE OR OTHERWISE OF RELATIVE MARKET DEMAND FOR A RANGE OF USES, RATHER THAN ACCEPTING DEVELOPER COMMISSIONED REPORTS THAT ARE DRAFTED TO JUSTIFY PROPOSED USE.</p> <p>11. RURAL SETTING AND TOPOGRAPHY  West Northants is characterized by small rural settlements and two rural towns (Towcester and Brackley). Historic development in the rural areas has - largely - been sympathetic to setting, with Silverstone Cluster being a great example of this. It is important that the rural appeal of our region is protected - indeed that is an aspiration within the LP that warrants</p>		



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		<p>further reinforcement. The visual impact of proposed developments is part of this, and the SPD must make provision for restraints on visual impact from adjoining roads and footpaths, hence incorporating absolute building heights to ridge as well as AOD measurements relative to surrounding topography in assessments. As an example, the proposed development of Shacks Barn (AL4) stands upon the Whittlewood Ridge with wide ranging visibility for miles around. The SPD needs to be clear that a large agricultural building, such as Figure 19, does not relate in form, scale or character to a monolithic warehouse. It is far more akin to a small industrial unit (using the SPD's definition on p39). It is inappropriate to propose that deciduous planting will 'disappear' into their rural surroundings even after many years.</p> <p>THE SPD SHOULD CONTAIN GREATER EMPHASIS ON THE NEED FOR AVOIDANCE OF NEGATIVE VISUAL IMPACT AND THE NEED FOR APPROPRIATE AND EFFECTIVE VISUAL MITIGATION MEASURES FROM OPENING YEAR.</p> <p>Specific items related to rural setting:  3.17 – please add to “the road network is made up on single track country roads”  ‘and is therefore unsuitable to accommodate increased traffic flow from nearby development’.</p>		

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		<p>3.18 - the SPD statement that 'the ability to provide development whose form and scale considers/reflects the rural character of this area through built or landscape elements will enable a more gradual and sensitive transition from North Towcester to the surrounding countryside' is entirely appropriate. The SPD should place a much stronger emphasis on this key consideration and request that development of AL1 begins at the southern end (closest to the A43) and is built incrementally towards the hamlet of Caldecote.</p> <p>The wording of the Overarching Design Principles for determining the appearance of the buildings needs to be more defined and specific – it is currently too vague and open to interpretation by the developers. The design of these buildings needs to be appropriate to the rural location. The existing development at Bell Plantation (Garden Centre) is a good example of aesthetic design and should be used as the design precedent for the application by DHL on the northern part of the AL1 site, as well as AL2 in order to provide a similarly attractive Northern Gateway. Please note that the maximum existing ridge height on the Bell Plantation Garden Centre section of the AL1 site is 6.5m (not 10m as per page 68).</p> <p><b>12. BUILDING HEIGHTS</b></p> <p>Building heights should be controlled to account for rural locations. The control of the</p>		

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		<p>maximum ridge height of buildings on AL1 and AL2 should be to a height of 10 metres above site road/ pathway level. The maximum ridge height for the buildings at AL4 should be 7.5 metres above site road/ pathway level. 9.5m (Screwfix) is the precedent for the local area therefore 10m would fit with the intent of the Local Plan (2) for small and medium sized units, together with a realistic expectation that planting can effectively mitigate impacts.</p> <p>THE SPD SHOULD MAKE PROVISION FOR IMPOSITION OF A MAXIMUM RIDGE HEIGHT FOR NEW UNITS OF 10 METERS ABOVE SITE ROAD/ PATHWAY LEVEL, HAVING REGARD ALSO TO RELATIVE AOD MEASURES IN ASSESSING SITE AND SURROUNDING TOPOGRAPHY AND IMPACTS.</p> <p>13. AL1 SPECIFICS</p> <p>For clarity and the avoidance of doubt the SPD must split the AL1 site into two sections with two separate applications. One should not be allowed to piggy back on the other, particularly since they are separated by woodland and will have two separate entrances onto the A5. Each application shows very different intent for land use and must be appraised and considered separately eg the DHL section is mostly monolithic large scale B8 warehousing, whereas the Bell Plantation section is a broad mix reflecting existing use.</p>		

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		<p>At page 68 para 6.18 only the DHL section of site AL1 should include vehicular access to any sports pitches - it is not the responsibility or obligation of the southern site to provide any access.</p> <p>At page 66 para 6.2 – the existing dog kennels business at Brickyard Farm is ignored, as is the fact that Bairstow's Lodge is an occupied domestic residence.</p> <p>At page 68 para 6.25 "Rising to approximately 16m" should be removed and replaced with 10m as the maximum ridge height (subject to comments above on AOD). 16m is far too high, exceeds the existing precedent and would lead to overbearance and negative visual impact on the sensitive receptors and wider area, it would also create an urban style corridor to the Northern Gateway.</p> <p>14. TOWCESTER NORTHERN GATEWAY</p> <p>Page 34 3.21 - PLEASE REMOVE THE FINAL SENTENCE 'if delivered sensitively and in line with policy this could see the delivery of some small sized buildings alongside medium and in exceptional circumstances, large development units' AND REPLACE WITH "This could see the delivery of some small and medium development units" in accordance with the LP 2 land allocation for "small and medium units".</p> <p>The reference to large development to units is introducing a new planning policy and</p>		

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		<p>is therefore inadmissible as it would be contrary to the remit of an SPD (2.2). Equally this statement is in direct contradiction to the earlier narrative about the open and sensitive nature and characteristics of the areas surrounding AL1 and AL2.</p> <p>3.22 The Towcester Masterplan states that the northern gateway acts as a key arrival point into the historic settlement of Towcester. THIS NEEDS TO BE REFLECTED IN THE DESIGN QUALITY, SCALE AND MASSING OF ALL THE ALLOCATED EMPLOYMENT SITES. The SPD should note that Silverstone, Whittlebury, Caldecote, Duncote, Greens Norton and Tiffield are also important historic settlements that deserve the same level of design quality, scale and massing considerations in relation to the development sites.</p> <p>THE ENORMOUS BUILDINGS HEIGHTS OF 21.5M (127.5 AOD) MUST NOT BE ALLOWED TO PROVIDE CONTEXT OR RELEVANCE FOR AL1.2.4, AND APPROPRIATE PROVISION MUST BE MADE IN THE SPD TO ENSURE THAT THIS IS THE CASE.</p> <p>15. SITE AL4</p> <p>6.60 The SPD should make reference to the site's poor south-bound access to the A43, requiring all south-bound traffic to and from the site to go through Silverstone</p>		

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		<p>village, which was dualled in 2002 specifically to remove heavy traffic from the village.</p> <p>6.65 The maximum development height for AL4 should be 7 - 7.5 meters, not the 10 -15 metres referenced. This is due to the local topography and the site's position in open countryside on rising land away from it to Whittlebury in particular. There should also be more sensitive receptors for this site. The maximum unit footprint for the AL4 development, given the access difficulties and other constraints, should be the existing development (1200m2) and Silverstone Fields (2,500m2)</p> <p>6.66 - There should be no large buildings on this site, for the reasons stated above.</p> <p>16. LANDSCAPE AND VISUAL IMPACT CONSIDERATIONS Page 43 to 55 - The Sensitive Receptors, and in particular Viewpoints 1-15 for AL1 &amp; AL2 and Viewpoints 1-12 for AL4 demonstrate the profound impact inappropriate development could have on Towcester and its surrounding rural areas.</p> <p>THE SPD SHOULD INCLUDE PROVISION THAT ALL APPLICATIONS INCLUDE VISUAL IMPACT ASSESSMENTS BASED ON SENSITIVE RECEPTOR/ VIEWPOINT LOCATIONS AS AGREED BY WNC AND WITH INPUT FROM AFFECTED PARISH COUNCILS ON LOCATION OF SUCH RECEPTORS AND VIEWPOINTS</p>		

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		<p>Buildings constructed adjacent to public roads should be permitted to propose heights in line with existing building on those roads to avoid visual overbearance.</p> <p>All existing boundary screening and vegetation must be retained and enhanced unless good reason can be shown for removal.</p> <p>Screening using trees must be large scale, with tree selection of mixed native species and following the advice of an arboriculturalist consultee, be of sufficient maturity to provide immediate, effective screening and full screening in a defined, reasonable number of years, and maintenance of screening must be baked into any approval.</p> <p>17. OVERDEVELOPMENT OF ALLOCATED EMPLOYMENT SITES</p> <p>ALL PROPOSED BUILDINGS AND ASSOCIATED INFRASTRUCTURE (SUCH AS PLANTING AND DRAINAGE) MUST BE REQUIRED BY THE SPD TO BE WITHIN THE ALLOCATION SITE AREA. This is of particular importance for AL4, where the developer has already attempted to increase the development site area by 28% by situating drainage ponds outside of the allocated land area. Ensuring that all planning mitigation and infrastructure associated with these developments is contained within the allocated land areas will prevent over-development of the sites and reduce the temptation to attempt further development on non-allocated neighbouring land.</p>		

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		<p>18. PUBLIC RIGHTS OF WAY  In proposing and assessing the IM Properties at AL3, the developer and WNC have both failed to take account of 3 PRoWs that will be impacted by development and lie just outside the site boundary. The PRoW that bisects the site is ignored by the developer and does not appear on the masterplan, with the presumption that it will simply be extinguished. THE SPD MUST PROVIDE FOR A HOLISTIC REVIEW OF ALL PRoWs IMPACTED BY A PROPOSED DEVELOPMENT AND MUST DEMAND THAT DEVELOPERS ACKNOWLEDGE SUCH PRoWs ON THEIR MASTERPLANS AND MAKE ADEQUATE AND APPROPRIATE PROVISION FOR WALKERS AND HORSE RIDERS IN THEIR PROPOSALS.</p> <p>19. MODAL SHIFT  The footpath/ cycleway proposed to provide a sustainable route to work for IM Properties AL3 proposal risks modal conflict and means a lengthy detour for users, such that the instinct will be to hop in a car. Bus provision is minimal with no guarantees that it will continue - ultimate provision will be an economic decision. Provision means a very lengthy, non-direct journey for users, taking them through a regularly congested Towcester before arriving at site. There is no bus provision from the enormous SUE to the south of</p>		



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		<p>Towcester which is required by local planning policy to demonstrate 40% modal shift, and which represents the most likely location for new employees. Bus provision is less than was provided at the time the Local plan was presented and there is no evidence of new routes coming forward. The treatment of modal shift at AL3 (and the SUE) is laughable, in no way delivers realistic sustainable travel options, and yet the Framework Travel Plan has been accepted by planners. LOCAL PLAN POLICY C1 AND C2 MUST BE HIGHLIGHTED IN THE SPD TO REINFORCE THE REQUIREMENT ON DEVELOPERS TO CONTRIBUTE AT APPROPRIATE LEVELS AND IN AN APPROPRIATE MANNER TO MODAL SHIFT TARGETS. WNC MUST BE PREPARED TO INTERROGATE PROPOSALS AND DEMAND QUANTITATIVE DATA UNDERLYING DEVELOPER ASSERTIONS.</p> <p>20. OVERARCHING DESIGN PRINCIPLES</p> <p>5.3. The general design principles are welcome but need to be numbered and the following should be noted:-</p> <p>Point 2 – fails to recognise that development platforms are determined almost entirely by the size of building, more particularly on a sloping site. Therefore an 8,000m2 building will require proportionately more cut and fill compared with a building half its size. As a consequence there is a far greater likelihood of a platform</p>		

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		<p>having to be built up from existing ground level, as that is more cost effective, thereby causing a much greater visual impact. THE SPD MUST HIGHLIGHT THAT IT WILL ASSESS THE VISUAL IMPACT OF BUILDINGS ON PLATFORMS, IN THE CONTEXT OF ABSOLUTE RIDGE HEIGHT AND RELATIVE AOD.</p> <p>Point 7 – using footpath, cycle and road networks to support and encourage sustainable travel to and around the site is a requirement in sustainability terms. However, this fails to take into account that the type of use ie warehousing will have a major impact on the levels of sustainable travel. Distribution logistics/warehousing is likely to require a workforce to be sourced outside the Towcester area (evidenced by the local socio-economic profile - 2.29) which completely undermines the case for sustainable transport. It is also disappointing that the current AL1 planning application fails to provide a quality cycle and pedestrian route from Caldecote to the site and then on to Towcester, and likewise Tiffield to AL3.</p> <p>Point 12 – the list of methods for limiting the impact on tranquillity of each site's rural setting should also include operating times and limits to operations (e.g. refrigeration), especially since the prevailing wind in the UK is from the south-west</p>		

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		<p>so in the case of AL1 (and AL3) noise pollution is more likely to be carried to residential areas.</p> <p>The key thing that section 2 of this SPD does is reinforce the requirement for flexible and skills matched employment provision for the local labour force within small/ medium sized structures. Aside from this, as far as I can see it simply reinforces existing Policy. Great, if applied, but reading LP1 and LP2 does depress me in terms of the failure to apply lots of policy in the case of AL3. Does it close any loopholes? If reference to large is removed and sizes revised, then yes. Otherwise it remains nothing more than a statement of intent against which non-defined 'material matters' can be balanced. Thank you for providing the opportunity for the public to improve planning policy implementation. I do hope that representations will be considered and implemented</p>		
SPD26 4	C Halford	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes Please provide comments to support your answer: As amended/expanded in the letter dated 11 August from Councillors Charles Manners and Alison Eastwood</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer:</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local</p>	

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		<p>As amended/expanded in the letter dated 11 August from Councillors Charles Manners and Alison Eastwood Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes Please provide comments to support your answer: As amended/expanded in the letter dated 11 August from Councillors Charles Manners and Alison Eastwood</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer: As amended/expanded in the letter dated 11 August from Councillors Charles Manners and Alison Eastwood</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes Please provide comments to support your answer: As amended/expanded in the letter dated 11 August from Councillors Charles Manners and Alison Eastwood</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer:</p>	<p>supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	

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		<p>As amended/expanded in the letter dated 11 August from Councillors Charles Manners and Alison Eastwood Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Yes Please provide comments to support your answer: As amended/expanded in the letter dated 11 August from Councillors Charles Manners and Alison Eastwood 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer: As amended/expanded in the letter dated 11 August from Councillors Charles Manners and Alison Eastwood Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Yes Please provide comments to support your answer: As amended/expanded in the letter dated 11 August from Councillors Charles Manners and Alison Eastwood 13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer:</p>		

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		<p>As amended/expanded in the letter dated 11 August from Councillors Charles Manners and Alison Eastwood</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>Yes. The enthusiastic support for this highly inappropriate proposed development reflects very badly on the new West Northamptonshire Council.</p> <p>Towcester, a small market town, has completely different needs and aspirations from Northampton, a heavily industrialised large town. Whereas this development is appropriate for the existing developments along the M1 corridor, it is entirely inappropriate for Towcester. It appears to have been waved through by various councillors who live in Northampton and do not understand issues local to Towcester. I would hope that even at this very late stage the development can be scaled back to something more appropriate to the environment. I would also expect a public inquiry into the methodology of how this has happened and how the developers have been allowed to drive a coach and horses through the planning process. If this development really must go ahead, it is absolutely essential that the height of the buildings is restricted to no more than 10 meters and the traffic managed appropriately. This is not WestNorthamptonshire's finest hour.</p>		
SPD26 5	P Brummitt	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>Not Answered</p> <p>Please provide comments to support your answer:</p>	As part of the planning application process, any adverse impacts on communities and individual properties which are identified will	Strengthening wording has been added to

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		<p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Not Answered Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p>	<p>need to mitigated to the satisfaction of the decision maker. The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. Consideration will be given to all road users. The employment allocations have been identified within LP Part 2. The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p>	<p>the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

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		<p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Extent of development proposal into agricultural land to the south of the properties on stratford road appears detrimental to the surrounding properties, countryside and further stresses the already inadequate / dangerous road network around the old stratford roundabout and a508 between aforementioned roundabout and yardley gobion turn. Proposals put forward currently include large warehouse massing on the agricultural field opposite scout camp and, if to be developed, would be far more suitable for low level office employment rather than industrial/warehouse 24hr operation with excessive light pollution and noise in an area that borders a natural habitat ( disused canal arm ) and well established residential properties.</p>		



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		<p>Vehicle movements cause the most concern, the old stratford roundabout is already a bottleneck at certain times of day, due to poor design and inefficient traffic lights, which will be made considerably worse by hundreds of additional HGV/LGV and car movements each day.</p> <p>The proposal is unnecessarily large in mass and area and will cause unacceptable detriment/additional risk to villagers, pedestrians, cyclists and road users who live and use the area in question.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Extent of development proposal into agricultural land to the south of the properties on stratford road would be detrimental to the surrounding properties, countryside and further stresses the already inadequate / dangerous road network around the old stratford roundabout and a508 between aforementioned roundabout and yardley gobion turn. Proposals put forward currently include large warehouse massing on the agricultural field opposite scout camp and, if to be developed, would be far more suitable for low level office employment rather than industrial/warehouse 24hr operation with excessive light pollution and noise in an area that borders a natural habitat ( disused canal arm ) and well established residential properties.</p>		

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		<p>Vehicle movements cause the most concern, the old stratford roundabout is already a bottleneck at certain times of day, due to poor design and inefficient traffic lights, which will be made considerably worse by hundreds of additional HGV/LGV and car movements each day.</p> <p>The proposal is unnecessarily large in mass and area and will cause unacceptable detriment/additional risk to villagers, pedestrians, cyclists and road users who live and use the area in question.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p>		
SPD266	C Stokes	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer: Cosgrove (AL5) is totally unsuitable for a development of this size.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer: The buildings planned are too large and too high to be even considered adjacent to rural houses. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a</p>

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		<p>Not Answered Please provide comments to support your answer: 7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p> <p>Not Answered Please provide comments to support your answer: 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p> <p>Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?</p> <p>Not Answered Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>Not Answered Please provide comments to support your answer:</p>	<p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.</p> <p>There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy. The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be</p>	<p>proposal for each site. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Building large amounts of Warehouses in the district because it will create employment cannot be justified. We are given to believe that there are 1.5 million job vacancies at present unfilled.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The development (AL5) is not at all necessary or suitable. There are at present several large Warehouse sites being built (2 million square feet) South off the A5, the enormous Northampton Gateway Development by the M1 Junction 15 and the new sites near Towcester. Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: (1) The Highway (A508) and the nearby A5 Roundabout cannot handle the volume of traffic at peak times now. When the A508 is used as an M1 diversion the road and roundabout becomes gridlocked. Locals trying to access the main road find it almost impossible at certain times of the day. It has been</p>	<p>consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	

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		<p>indicated that the largest unit proposed will have 24 hour per day vehicle movements. It has been estimated there will be over 1,000 extra movements per day along the A508, with that and the Thousands of vehicle movements driving to and from "The Northampton Gateway" The A508 plus the added pollution will make life impossible for the Residents of Cosgrove.</p> <p>(2) Cosgrove Village has a Caravan Park of approximately 900 Caravans and has to tolerate the very large volume of daily traffic movements in and out. The villagers are already having to cope with the Traffic, Pollution and Disturbance associated with the Park. The development of the Industrial Estate will make certain areas of the Village unliveable.</p> <p>(3) The size and height of the proposed units are far too large to be built in such close proximity to housing. If such buildings are absolutely necessary they should be constructed well away from Villages and homes.</p> <p>(4) Cosgrove Village has a number of Conservation Areas with Canal and Riverside walks. The building of such a development will have a devastating impact on the area and the wildlife.</p>		
SPD26 7	J Munn	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes Please provide comments to support your answer: No comment.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape</p>

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		<p>Please provide comments to support your answer: No comment. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer: No comment.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No comment.</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer: No comment.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No comment.</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p>	<p>flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.</p> <p>There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>The scope of the SPD is to establish general guidance and design</p>	<p>design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>

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		<p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: No comment.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No comment. Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: No, I do not agree with the “opportunities” that have been identified in respect of Site AL5. Specifically, I do not agree that any of the objectives which are said to be met by the allocation (set out below) are met by the allocation of Site AL5.</p> <ol style="list-style-type: none"> <li>1. To facilitate economic growth encouraging investment and job creation, aligning training with employers’ requirements to get more people into work and reduce levels of unemployment.</li> <li>2. To deliver appropriate new employment opportunities in both the urban and rural areas, including home-based working and extended employment areas, facilitated by high-speed broadband.</li> </ol>	<p>principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

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		<p>9. To conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes</p> <p>In response to objective 1 and 2, I have serious concerns around who the jobs are being created for? It is a well known fact that the AL5 site sits on a boundary between 2 counties, South Northants and Buckinghamshire. However, we are 16 miles from the next major town on the South Northants side (Northampton) and then less than a quarter of a mile into the Buckinghamshire side we have 250,000 people living in a space which is 34sq miles.</p> <p>With a population density set to grow to 500,000 by 2050 any "employment" created will not be serving South Northants. Worse still, the plans put forward to date have all been for satellite distribution centers meaning that any jobs that will be created will be nominal compared to service based roles as the majority of the work will be completed through technology automation relying very little on humans.</p> <p>In response to objective 9, I do not believe that the allocation of 16 hectares of land that borders a nature reserve in any way conserves the tranquillity of the natural and built environment. I understand that the site is an old quarry, however, I don't think that is reason enough to not look at the site in the context of its larger surroundings which as noted above is adjoined to the Ouse Valley Park.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site</p>		



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		<p>should be considered?  No  Please provide comments to support your answer:  Please find attached below my comments in relation to the allocation of the Furtho Pit area of Cosgrove / Old Stratford for future development.  Traffic generation / road safety; A concern for many residents in and around the area is the increase in traffic expected from the current proposed development of 750,000 sqft of warehousing space in 16 hectares. It's clear that the A5 roundabout is nearing capacity with regular traffic jams throughout the day and into the night and with the view to expand the population of Milton Keynes to 500,000 people by 2050 there will be mounting pressure on what is already an incredibly busy road connecting MK to South Northants and beyond.  Being the back bone of Milton Keynes the A5 allows people to move quickly through the city from one end (Caldecott) to another (Stony Stratford) with little friction, however, the addition of hundreds of slow moving HGV's into the mix will only lead to travel congestion, disruption and worsened safety for all road users.  There are also of course other considerations that include noise and pollution that will come with the increased traffic in the area.  Visual amenity; having reviewed the plans put forward to date, the plans for large scale distribution centers will hamper and detract from the current street scene which is made up of meadows and small villages.</p>		

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		<p>Loss of light; the current plans do not seem to have taken into account that there are residents all the way along the Stratford Road who live within 30m of the boundary of the planned development. With plans for warehouses up to an eaves height of 15m there will almost certainly be a loss of light.</p> <p>Noise and disturbance resulting from use; again, but affecting those in all directions, especially those on the Stratford Road is the amount of noise that will be created by the loading, unloading and dispatching of lorries 24 hours a day. There is also light pollution to be conscious of and the proximity of housing to proposed development.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p>		
SPD268	L Devayya West Northants Economic Development	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>The contextual considerations and design principles will be complimentary to the existing rural nature of the area and ensure that future developments enhance the community and aren't detrimental. It is essential that whilst the development of the employment allocations create jobs and boost the local economy, that the quality of life of residents and workers is not impacted as this will have a negative impact. The rural nature of the area must be considered and any developments must recognise the contextual landscape and align with the aesthetic of the area.</p>		

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		<p>Pertinent points are as follows:  Rural Setting North of A43, point 4 - "The ability to provide development whose form and scale considers and reflects the rural character of this area through built or landscape elements will enable a more gradual and sensitive transition from north Towcester to the surrounding countryside."  Design Principles point 6 – Where possible contribute to the area's wider green network, including habitat corridors and linkages."  Design Principles point 12 – "Limit the impacts on tranquillity of each site's rural setting, this includes minimising/mitigating any light, noise &amp; air pollution or visual clutter (i.e., advertising) resulting from the future operation of new buildings.  5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?  Yes  Please provide comments to support your answer:  Demand for scale of unit size should be driven by the market, but it is a known challenge that there is a shortage of small-medium commercial units. The SPD takes this into consideration noting that there will be a mix of small, medium and large units and this will be respective of the location of each of the sites. The needs of businesses, the workforce, residents and investors should be considered when approving applications for development, as outlined in the SPD – "a variety of employment types...to reflect the need for diversity and resilience in the local economy."</p>		

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		<p>99% of businesses in West Northamptonshire are SME's, meaning the commercial premises within the area should be reflective of this, whilst including premises that allows businesses to scale and grow. The ecosystem of businesses requires start-up space, grow-on space and large unit space – by having the range all within the local area, West Northants can capitalise on its high business birth rates, secure a greater level of inward investment and allow businesses to grow and relocate, whilst safeguarding jobs and keeping them within the area. The Joint Core Strategy objectives 1, 2, 3 &amp; 9 are exactly what should be considered in terms of allocating employment land and approving applications and will align with the new Economic Growth Strategy which will soon be developed for West Northants.</p> <p>Section 3.2 is highly important to recognise the “role of the employment sites are in part to:</p> <ul style="list-style-type: none"> <li>• Meet local demand and strength the rural economy;</li> <li>• Provide the ability to strengthen local supply chains;</li> <li>• Local flexibility and choice of locations;</li> <li>• Meet the demand for small and medium sized unites; and</li> <li>• Contribute to reducing the level of out commute”</li> </ul> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>The analysis and detail of the site is a true reflection of its nature. The approach of “individual site assessments” instead of “a prescriptive, one-size-fits-all</p>		

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		<p>approach” is in keeping with the diverse nature of the economy in different areas and reflective of the difference in nature of the employment allocations.</p> <p>A key point which is an opportunity of all of the allocations, though each site will have its own constraints to deliver, is section 7.5 stating “The opportunity for development proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area.”</p> <p>All development proposals which create employment opportunities should be required to work with WNC’s Economy Team through the West Northants Employment Support Service (WNESS) to ensure the developments have maximum impact. It is also required that where a developer is unable to produce a comprehensive Local Labour Strategy, they pay a S106 contribution towards the WNESS to ensure that local employment is supported and the service can continue to assist residents and employers to maintain a low unemployment rate, reduce out-commuting and support the overall economy.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>Yes</p> <p>Please provide comments to support your answer: The Site Development Framework aligns with the nature of the area to preserve the rural area, align with the quality of the place and safeguard the quality of life available within South Northamptonshire.</p>		

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		<p>The Development Framework should include a requirement in terms of supporting local employment, working with WNC and our WNESS to maximise opportunities for local people to access local employment, including temporary roles from construction stages to working with any employers who occupy the premise. It should be noted that a Local Labour Strategy will be essential for the development of any of the Employment Allocations to outlining how the development will assess the economic impact, the opportunities and constraints of local employment and address actively supporting the local labour market. Where a S106 contribution is received for the development to the Economy Team, support will be given to maximise the site's opportunities, working with the developer and occupants on a permanent basis to recruit locally, upskill staff and directly engage with the community, maximising the benefit to the local economy.</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>The analysis and detail of the site is a true reflection of its nature. The approach of "individual site assessments" instead of "a prescriptive, one-size-fits-all approach" is in keeping with the diverse nature of the economy in different areas and reflective of the difference in nature of the employment allocations.</p>		

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		<p>for development proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area.”</p> <p>All development proposals which create employment opportunities should be required to work with WNC’s Economy Team through the West Northants Employment Support Service (WNESS) to ensure the developments have maximum impact. It is also required that where a developer is unable to produce a comprehensive Local Labour Strategy, they pay a S106 contribution towards the WNESS to ensure that local employment is supported and the service can continue to assist residents and employers to maintain a low unemployment rate, reduce out-commuting and support the overall economy.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>The Site Development Framework aligns with the nature of the area to preserve the rural area, align with the quality of the place and safeguard the quality of life available within South Northamptonshire.</p> <p>The Development Framework should include a requirement in terms of supporting local employment, working with WNC and our WNESS to maximise opportunities for local people to access local employment, including temporary roles from construction stages to working with any employers who</p>		

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		<p>occupy the premise. It should be noted that a Local Labour Strategy will be essential for the development of any of the Employment Allocations to outlining how the development will assess the economic impact, the opportunities and constraints of local employment and address actively supporting the local labour market. Where a S106 contribution is received for the development to the Economy Team, support will be given to maximise the site's opportunities, working with the developer and occupants on a permanent basis to recruit locally, upskill staff and directly engage with the community, maximising the benefit to the local economy.</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>The analysis and detail of the site is a true reflection of its nature. The approach of "individual site assessments" instead of "a prescriptive, one-size-fits-all approach" is in keeping with the diverse nature of the economy in different areas and reflective of the difference in nature of the employment allocations.</p> <p>A key point which is an opportunity of all of the allocations, though each site will have its own constraints to deliver, is section 7.5 stating "The opportunity for development proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area."</p>		

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		<p>All development proposals which create employment opportunities should be required to work with WNC's Economy Team through the West Northants Employment Support Service (WNESS) to ensure the developments have maximum impact. It is also required that where a developer is unable to produce a comprehensive Local Labour Strategy, they pay a S106 contribution towards the WNESS to ensure that local employment is supported and the service can continue to assist residents and employers to maintain a low unemployment rate, reduce out-commuting and support the overall economy.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>The Site Development Framework aligns with the nature of the area to preserve the rural area, align with the quality of the place and safeguard the quality of life available within South Northamptonshire. The Development Framework should include a requirement in terms of supporting local employment, working with WNC and our WNESS to maximise opportunities for local people to access local employment, including temporary roles from construction stages to working with any employers who occupy the premise. It should be noted that a Local Labour Strategy will be essential for the development of any of the Employment Allocations to</p>		

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		<p>outlining how the development will assess the economic impact, the opportunities and constraints of local employment and address actively supporting the local labour market. Where a S106 contribution is received for the development to the Economy Team, support will be given to maximise the site's opportunities, working with the developer and occupants on a permanent basis to recruit locally, upskill staff and directly engage with the community, maximising the benefit to the local economy.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p>		
SPD269	W Evans	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>Yes</p> <p>Please provide comments to support your answer: But the SPD refers to small and medium sized units only and not large size units.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer: No see above.</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>Not Answered</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The scope of the SPD is to establish general guidance and design</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?  Not Answered</p> <p>Please provide comments to support your answer:  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered</p> <p>Please provide comments to support your answer:  11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p>	<p>principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer:</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The original application was for a much smaller development. Somehow this has morphed into a much larger proposal. The increased traffic on the A508 arising from the project will damage the infrastructure of and vehicular access to Cosgrove. The A5/A508 roundabout is already congested and no consideration appears to have been given to the increased traffic that will also inevitably be coming from the developments at the Bletchley end of the A5 and the new rail/road link at the A508 / Junction 15 of the M1. The A508 will not be able to cope. This must have a detrimental effect on air quality and the wider environment. Comparisons are odious, the the use of the Swan Valley units as the reference point for Large Units is inappropriate – comparing unit size to a site adjacent to the M1 and those by the A508 and in a residential area is not a sensible comparison. This project will have a detrimental impact on green and conservation areas. It is not acceptable to have lit units working 24/7 in a rural environment. There will be noise, light pollution and street litter. Few local people will benefit, especially if large logistic units are approved as they will be automated</p>		

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		<p>and employ numbers not proportionate proportionate to their size.</p> <p>If the Stratford Road fields must be developed it should be small low level buildings in this area</p> <p>Warehousing provides little employment opportunity. Many operate fully automated in darkness.</p> <p>etc etce</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>This project is flawed, it somehow has morphed from small/medium units to a large infrastructure logistics hub. It is not in compliance with the SPD and brings into question the approach and attitude to development by planning officers. Are they working for the benefit of Northamptonshire ratepayers or the developers and their agents?</p>		
SDP270	R Gray	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Yes we do agree with a number of statements but would like the document to go further</p> <p>Reference to the M1 should be removed as relevant context for AL1/2/4. The contextual considerations for AL1-4 are identified on page 26 as sites 2-7.</p> <p>Site 1 is situated on a motorway node, is strategic development and does not therefore represent a relevant reference point for AL1/2/4.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will</p>

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		<p>We support Local Plan policy to deliver high quality small and medium scale development that is respectful of its setting within the boundaries of the allocation sites. This is core to the effectiveness of LP2. We want to see that development platforms are created to reduce the impact of the scale and massing of buildings on local character and the setting of the site, either in response to their height and/or the long &amp; uniform ridge lines they may introduce. We seek to minimise any visual overbearance on short distance views, through immediately effective measures such as landscape screening and elevational treatment, and avoid significantly altering the character of middle or long distance views. Ridge heights must be measured in combination with "Above Ordnance Datum" (AOD) and site topography. AOD provides a standardised measure of height across sites (usually relative to sea level). Where a site slopes, developers may not create plateaux on the land to elevate buildings above road level. Plateaux must be excavated to AOD road level to reduce visual impact on the neighbourhood. A ridge height limit of 10m in relation to existing road levels is therefore essential to prevent overbearance.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Yes as far as it goes, all references to the Strategic Scale sites used as context within the SPD should make it absolutely clear that the sites subject of the</p>	<p>consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. Provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as</p>	<p>need to be undertaken to best shape a proposal for each site. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact assessment in line with the general</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>SPD are not for large scale buildings. All wording should be 'Large Scale buildings will not be accepted on these sites' (the current definition being above 5,000 sqm.)</p> <p>In order to prevent future amalgamation of buildings to circumvent the intent of the SPD there must be a cap on the m2 for large buildings (e.g. 5,000m2 x 2). This should clearly state that despite a definition for large buildings being included, they will not be permitted on any of these sites.</p> <p>The scale of buildings along the A43 Technology corridor indicates a maximum of 5,000 sqm including Silverstone Circuit buildings. Therefore, 'medium buildings' maximum is 5000sqm</p> <p>Large reflects the scale of buildings/units found in Swan Valley, a distribution park along the M1, setting a minimal footprint of 8,000 sqm at that location.</p> <p>A cap on 'Large' is needed.</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>This is in reality two sites; and we should seek to maintain the separation of both sites and to preserve biodiversity and improve visual and sound screening the coppice woodland dividing the two sites must be retained at its existing depth and density, contrary to the point at 6.22.</p> <p>If the sports pitches are not located on the 6ha allocated to TFC then development of those 6ha for small and medium size units must take place before</p>	<p>the enhancement of pedestrian cycling and walking links.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>principles set out in the SPD.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>the adjoining 25 ha in northern section are developed. See Page 66 para 6.7 (Topography) and para 6.10 (Views and Visual Sensitivity). This would mirror the Porsche development on the southern side of the A43 in the Tove Valley Business Park. The far northern section of the site closest to Caldecote should be the final area to be developed.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:  The reference to 16m is too high, these are not small or medium size and what does 'rising to' mean? is it the AOD height or the building height?  Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 10m in height –and being effectively fully screened from sensitive views by either existing or proposed tree planting.  10m ridge height is the maximum acceptable height and buildings with 10m heights and up to 5,000 sqm footprints should be set back from the site edges to minimise visual sensitivity from sensitive receptors. Buildings which have a greater impact ie are visible above tree cover / from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering deliver the highest design quality and a thorough programme of landscape measures which must be subject of a maintenance programme set out in a legal agreement.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer: Buildings up to 10m AOD should be located in the centre of the site to reduce visual impact with appropriate screening This development must be compatible with the vision of an attractive 'northern gateway' to Towcester (see page 34 para 3.23). The enhanced planting section at the north east section of AL2 should be extended to the south east corner.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: An independent assessment is required to establish safety and viability of this access point, road width and the approach to allow safe crossing of the Tove roundabout. Given there are no lights on the roundabout coming from Greens Norton, the traffic backs up at peak hours this will only add to the queues and safety on the roundabout. Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of an eco-lighting plan and consistent use of wayfinding/signage should be considered implemented which minimises light pollution.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>AL2 is roughly 1km west of the boundary of the Registered Park and Garden/Conservation Area of Easton Neston House, with the A43, housing and employment development situated between it and the protected estate. AL2 sits on the alignment of a tree-lined avenue in front of the House, this once provided provides a visual link from the House to the church spire in Greens Norton which is an important view and forms an 'eyecatcher' (i.e. a distant feature deliberately incorporated as an intentional view within the design of a park). Although any relationship is largely severed by intervening development Future proposals for AL2 should consider protect views along this alignment when preparing the arrangement, height and massing of any built form.</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Current existing units at Shacks Barn (referred to as Silverstone Business Park) are 250m2 to 1200m2. Silverstone Fields on the opposite side of the A43 on a visually less prominent site has units up to 2,500m2. There should be no units larger than 2,500m2 at AL4 given the precedent for this location and the access difficulties for HGVs.</p> <p>Units at Silverstone Park (adjacent to the Circuit) are between 250m2 and 5000m2. Reference is made to the scale and form of these buildings being</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>heavily informed and in scale to buildings within the circuit. A similar link must be made to assess the suitable scale and form for AL4 in relation to the existing development at Shacks Barn.</p> <p>The road access through Silverstone village and the school with the proposed HGV use is not acceptable.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>SUDs need to be provided within the existing 10 hectare allocated site per LP2, the developer's proposal and application to site the SUDs outside of the 10h, thereby enlarging the allocated area by 28%, would lead to over development of the site. Given the sensitive nature of its location this should not be permitted.</p> <p>The SPD as currently proposed would facilitate the largest of the units in the current application, (6968m<sup>2</sup> x 15m) which are intended as warehousing with 16 bays for HGVs. It is this aspect of the proposed development on AL4 that must not be allowed to proceed through wording in the SPD.</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p> <p>No</p> <p>Please provide comments to support your answer:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>we are not appraised of the site in any detail, however the comments on building sizes and cumulative traffic surveys apply here</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: For each development application, traffic impact should be assessed on a consistent basis across sites, and cumulatively factoring all built and committed sites that have an impact on the same stretches of road. This in the context of prior pinch point funding on Tove/Abthorpe roundabouts and predicated on creating a road network able to cope with 3000 new houses at SUE. Include all future development on AL3 within the scope of the SPD. This will include any changes, remodelling, extensions or changes to the existing planning permission that has been granted. The South Northamptonshire Local Plan (Part 2) 122 states:</p> <ul style="list-style-type: none"> <li>• Meet local demand and strengthen the rural economy;</li> <li>• Provide the ability to strengthen local supply chains;</li> <li>• Local flexibility and choice of locations;</li> <li>• Meet the demand for small and medium sized units and</li> <li>• Contribute to reducing the level of out commute</li> </ul>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		The current proposals do not meet these criteria and should be changed.		
SPD27 1	No Info			
SPD27 2	S Comerford, Cosgrove Parish Council	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: The SPD fails to acknowledge the effect on the environment and residents of Cosgrove.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer: If this method is a way of controlling the size and height of units, and prevents developers from building oversized units, then this approach should be welcomed. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer: AL1 is of less concern to Cosgrove, although will inevitably impact on traffic levels.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered</p>	<p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site. The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy</p>	The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: AL1 is less of a concern to Cosgrove Your comments about Site AL2 - Land at Woolgrowers Field, Towcester 8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>Please provide comments to support your answer: AL2 is of less concern to Cosgrove, although will inevitably impact on traffic levels. 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL2 is of less concern to Cosgrove Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>Please provide comments to support your answer: AL2 is of less concern to Cosgrove, although will inevitably impact on traffic levels. 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered</p> <p>Please provide comments to support your answer: AL2 is of less concern to Cosgrove</p>	<p>development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: SNC accepted this site for development without any consultation of residents. Why?</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The village of Cosgrove already suffers greatly from very heavy traffic as there is no alternative access to Cosgrove Park. Entry into the village is from the A508 via the Stony Stratford roundabout and A5 and A508 interchange, this gets heavily congested, particularly when there are blockages on the M1. Any development will have an immense and unacceptable impact on the village and surrounding areas without substantial improvements to the highways infrastructure. Is there any real need for such a development that will destroy the integrity of a village when there are already so many huge warehouse projects in Northamptonshire? Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		

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		<p>The inclusion of land in Cosgrove Parish was introduced without any communication with residents to indicate that the proposed area had increased dramatically with the resulting impact on the community.</p>		
SPD27 3	M Morris Farthinghoe Parish Council	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: We do not believe there is a need for further large logistics warehouse particularly as we are already surrounded by them just across the county border in Banbury. We are also severely affected by the increase in HGV traffic on the A421/A422 corridor generated by such new developments in Milton Keynes which are adjacent to this corridor. Highway infrastructure should be put in place to cope with such development BEFORE the development is allowed. Farthinghoe was promised this in the early 1990s and has been denied it since</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: We do not believe that these large units have been introduced within the spirit or the letter of the Local Plan. Many Parish Councils contributed hours of time to the Local Plan and most feel the same way. It is time for the Planners to re-engage in a much closer manner with the local Parishes before putting their interpretation.</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.</p> <p>There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>This re-engagement should be with the use of more plain language and not wrapped up in meaningless technical jargon or unnecessarily complex formats</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>We believe that this area has no local need for such large developments, be it for business reasons or for meaningful employment reasons.</p> <p>They are merely the start of the slippery slope leading to South Northants becoming a large distribution hub for the whole country</p> <p>Insufficient Planning has gone into this, particularly with Highways input to ensure that the Local Highway are adequate to cope.</p> <p>Adequate highways and infrastructure should be in place BEFORE any development takes place and should not have to wait for 106 months to put these in place in retrospect.</p> <p>The domino effect of such developments on highway needs spreads far and wide in such a random manner that traffic "modeling" is more of a guess than a science</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>This will include in areas such as Milton Keynes.</p> <p>Cross boundary discussions will continue.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>It should only consider small and medium developments with high value employment opportunities</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>As AL1</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>As AL1</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>As AL1</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>As AL1</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Much more consideration should be given to the effects of such development far and wide It is almost certain that this will considerably increase the HGV traffic flow A421/A422 along its full length The traffic situation at the Farthinghoe pinch-point is already at a saturation point and AL5 along with other huge nearby developments by Milton Keynes Council will push it over the top. Current any cross border discussions on these issues have been negligible, meaningless and futile More needs to happen to establish the cumulative effects of all development. These are not local issues, they are district and often National</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: See above Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: I think that our theme is very clear There should be a National Strategic Plan which does not leave villages like ours with such a useless infrastructure Farthinghoe has been a victim now for 30/40 years</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Our 1990s Bypass funding from the Milton Keynes Development Corporation was removed by Westminster because of the National Financial situation at the time.</p> <p>Despite the fact that there have been numerous boom situations since it has never been reinstated Meaningless promises by County and District Councils since have been followed by no action.</p> <p>"The Farthinghoe Bypass is a top priority" is a statement which we have often heard and seen in Press Releases but it is a statement which now rings very hollow</p>		
SPD27 4	R Drinkwater	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: It seems strange that these sites are being looked at in South Northamptonshire when Milton Keynes would seem a far more suitable location, having available development land and numerous empty warehouses.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029). The local plan preparation process considered the impact of Milton Keynes.</p> <p>As part of the planning application process, any adverse impacts on communities such as Cosgrave and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include matters of ecology.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. Consideration will be paid to all users.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Cosgrove is a small village which would be overwhelmed by the size of development proposed. Vehicle movements day and night would be totally inappropriate in such an area. The site proposed is currently a haven for wildlife including . It would be severely adversely affected by this development. The current residents of Stratford Road would be subject to noise day and night. The increase in local traffic would cause gridlock on an already busy roundabout at Old Stratford. Traffic travelling between Milton Keynes and Northampton often causes long queues and if there is a problem on the M1 the situation becomes massively worse.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The safety of the residents leaving the village would be greatly impacted by large numbers of vehicles accessing the site. This would be particularly bad during the months that the caravan park is open (April-October) when traffic into and out of the village massively increases. Highways have said that they cannot afford additional safety roundabouts. This is not a safe proposal for land in a tiny community without vast investment in road infrastructure. Any other comments</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>14 Are there any other comments you wish to make which you have not already made?            Are there any other comments you wish to make which you haven't already made?:            Industrial units on this site which is in close proximity to a Scout camp also has severe safety implications. It is used by many youth groups, many of whom walk into Cosgrove from the site and also access local walks from there. Increased traffic, including lorry movements would be extremely detrimental to the safety of the site users and would also cause noise nuisance.</p>		
SPD275	A Bracey	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?            No            Please provide comments to support your answer:            5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?            Not Answered            Please provide comments to support your answer:            Your comments about Site AL1 -Land at Bell Plantation, Towcester            6 Do you agree with the constraints and opportunities identified in respect of Site AL1?            Not Answered            Please provide comments to support your answer:            7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?            No</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p> <p>Please provide comments to support your answer: 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered</p> <p>Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer:</p>	<p>impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include adjacent properties.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The road infrastructure is not sufficient to cope with the additional traffic that will be generated by the development. There is already a danger hot spot at the Cosgrove and Castlethorpe turns on the A508 which despite numerous appeals and site visits the areas remain a black danger spot with many accidents occurring so this development would only add to this.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: Original plans only included Furtho Pit in Old Stratford which has historically had industrial use on it. Without consultation to any official body they have crossed the boundary into the next Parish which is open agriculture land and has never historically had any development rights, We now find out that it has now been designated industrial land of which we now find that they have given more consideration to the areas around them then they have given to the residents in the bungalows opposite.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>If this was to turn into a planning application we are concerned about 24 hour operational movements of large vehicles light pollution, noise pollution</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		heavy traffic movement in an already grid locked inadequate road system. The close proximity to the bungalows opposite this development		
SPD27 6	S Perkins Define Planning Vistry Group	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Not Answered Please provide comments to support your answer: The overarching design principles that have been set out are sensible, but should be expanded to ensure that developments take account of their context and other site-specific considerations. A key element of that is ensuring that the development of the employment sites takes account of future sustainable transport initiatives, and makes appropriate allowances for those schemes; in particular by ensuring that development proposals do not sterilise land or limit the ability of those schemes to come forward. Whilst it is not reasonable to expect developers to identify all potential long-term transport solutions, they should take account of initiatives that are well-advanced and in the public domain. Thus, it is important that appropriate consultation is undertaken with key stakeholders to ascertain the sustainable transport interventions that must be taken into account in advancing proposals, and that those initiatives are positively responded to. Thus, bullet point 8 should be revised as follows: “Ensure that Councils (both South Northamptonshire / West Northamptonshire and neighbouring authorities), the County Council, National Highways and public transport operators are consulted at an early stage to help explore the scope of and funding for current and future public transport improvements,</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. This will include measures of sustainable travel.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The employment sites are allocated within the Local Plan Part 2.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>including the frequency and access to services for future employees. Development proposals should respond appropriately to those public transport initiatives to ensure that they can be delivered in the future.” Similarly, it is important that the impact of schemes on highway capacity / safety is fully accounted for, and that a comprehensive approach can be achieved in relation to highway improvement across multiple development sites and throughout the planning process (i.e. across planning policy and development management). Therefore, it is suggested that a further overarching design principle is added that requires developments to: “Take account of their impact on the surrounding highway (including, where appropriate, their cumulative impact), the scope of any mitigation required, and respond positively to / facilitate future highway improvement schemes that have been identified by key stakeholders (South Northamptonshire / West Northamptonshire and neighbouring authorities, the County Council, National Highways, etc.).” Similarly, reference should be made for the need to take account of developing growth options as they come forward through the preparation of the West Northamptonshire Strategic Plan (WNSP). It is suggested that a final bullet point is added, therefore, that requires developments to: “Take account of, and respond positively to, emerging development proposals as contained in the Regulation 18 (or later) version of West Northamptonshire Strategic Plan, and ensure that their development potential is not sterilised.”</p>	<p>Provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of pedestrian cycling and walking links. Discussions will continue on cross boundary matters.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Not Answered Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Continuing on from the points raised in Vistry Group's response to Question 4, there is a lack of reference made to site AL5's specific context and a number of the constraints and opportunities that will guide its development. Notably, the constraints and opportunities audit fails to recognise potential public transport initiatives in the area that have been identified by key stakeholders, the capacity of the A5 at key junctions near to the site, potential highway improvements in the area, and the potential for nearby strategic development. Thus, the 'Access &amp; Movement' section of the site assessment should be expanded to fully take account of those matters (as below). Mass Rapid Transit (MRT) Strategy:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>In relation to potential public transport initiatives, the audit should recognise that the Milton Keynes Strategy 2050 (MKS) has identified a long-term vision for a Mass Rapid Transit (MRT) network that permeates through Milton Keynes and connects with its neighbouring authorities. The MKS 2050, which has been prepared based on an extensive evidence base that includes a Mobility and MRT Study, sets a vision for an MRT system that runs along the A5 to the Old Stratford roundabout, before passing through the roundabout and continuing north along the A5. The Old Stratford roundabout is, therefore, a key node in that strategy, which will require significant re-structuring both to facilitate the MRT network and to release highway capacity (as discussed below).</p> <p>It is critical, therefore, that the MKS's MRT strategy is referred to in considering the constraints and opportunities relating to AL5, and that the SPD makes clear that any scheme should respond to the strategy in a positive manner so as to allow for its implementation in the medium-long term.</p> <p>Highways Impact, Mitigation and Future Works:          Whilst it is recognised that the site's assessment makes reference the A508 frontage, that appears to have largely been considered in place-making terms; with the SPD making clear that a key priority is for the development to respond in a positive manner to the A508 and create a gateway along it. The SPD should, however, be similarly clear in referencing that proposals should take account of their wider highways impact (including cumulative impacts), the need for mitigation, and the long-term aspiration to facilitate works to the A5 / A508 / A422 / Towcester Road junction.</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Indeed, West Northamptonshire Council (WNC) have, in their recent Strategic Plan: Spatial Options consultation, recognised that the roundabout and this area of the A5 corridor is reaching capacity. In that context, it is a key strategic priority of stakeholders including National Highways to achieve a highway solution at this stretch of the A5 (potentially incorporating the MRT strategy) to effectively 'free up' capacity. The opportunity and constraints audit should, therefore, highlight the importance of ensuring that proposals do not sterilise potential highways solutions, for example by locating site access in an inappropriate location. Moreover, it should be made clear that proposals will need to assess and appropriately mitigate their impact on the highway network (in particular relating to the A5 corridor / Old Stratford roundabout).</p> <p>Responding to other schemes:  Furthermore, as set out in response to Question 4, reference should be made to responding to any developing growth options that advance through the preparation of the WNSP. Therefore, the audit should refer to the need to consider potential future development sites (e.g. the land identified as Spatial Option 5b in the WNSP Spatial Options consultation).</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?  No  Please provide comments to support your answer:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Whilst it is recognised that the Site Development Framework for AL5 is a high-level framework that will ultimately guide development proposals, it is critical that the matters raised in Vistry Group's response to Question 12 are considered in re-visiting the framework. That is particularly the case in relation to access and movement. Indeed, paragraph 6.85 should be expanded to reflect that the site access should be located and designed in a manner that will not compromise any highway solution at the Old Stratford roundabout and, if taken forward, makes an appropriate allowance for the delivery of a site access to potential future development sites that have been identified in the area.</p> <p>Similarly, when referring to new active travel routes (paragraph 6.86), the development framework should make reference to the requirement to respond positively to the identified MRT network that will, if delivered, run through the Old Stratford Roundabout and along the A5. Again, the framework plan should be reviewed and, where relevant, illustrative graphics could be added.</p> <p>Any other comments  14 Are there any other comments you wish to make which you have not already made?  Are there any other comments you wish to make which you haven't already made?:</p>		
SPD27 7	A Dolan	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?  No  Please provide comments to support your answer:</p>	The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The employment sites are identified in the Local Plan Part 2. As part of the planning	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>There is a total lack of consideration for environmental factors as well as the effect on the residents of Cosgrove village in the SPD</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer: If this helps control the height and size of developments, then I consider this approach as a positive method Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p>	<p>application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include environmental issues and Cosgrave.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: The site was accepted for development by SNC with no apparent consultation with the residents of Cosgrove village, which I find a questionable decision 13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The impact on the infrastructure is difficult to see as anything but negative - currently there is only the one route of access through Cosgrove Village for</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>the holiday park, the road is already at or over capacity for much of the year. The A5/A508 interchange is also not currently fit for an increase in vehicles on the scale of the proposition - this junction is often congested. There are also a concern on light and noise pollution and I question the potential for employment when many modern distribution centres run 24/7 with very few staff.</p> <p>With other similar projects happening in the area, is this one - in a residential area - with infrastructure and environmental concerns the most sensible choice?</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p>		
SPD278	P Rawlinson	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Whilst the geographic advantages of the area for large scale distribution are understandable, the existing transport capacity is not sufficient and should be considered in relation to Ox-Cam Arc plans and other similar sites in neighbouring authorities will also impact traffic congestion.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer: Additional traffic generated on the A5 through Towcester</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer: Again traffic issues</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Yes Please provide comments to support your answer:</p>	<p>development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: A large development will increase traffic in an already congested area that has no alternative alternative routes.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: A large development will increase traffic in an already congested area that has no alternative alternative routes. Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: The development of employment locations that could be small, medium or large distribution sites in the area will lead to increased traffic in areas that already congested - eg A43 and A5. There is unlikely to be sufficient mitigation in any plans, especially with large distribution sites.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>These areas clog up already when the M40 or M1 are impeded. There are also distribution development built to the west of J11, Banbury and 3m sqft of distribution planned at J10 in Cherwell. All this will contribute to significant increases in traffic on the South Northamptonshire routes.</p> <p>The whole development needs to be considered in relation to the emerging plans for the Ox-Cam Arc and east/west transport links. In addition, the Farthinghoe bypass needs to be built in order to help transport flow.</p>		
SPD279	T Eggleton	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: It appears that the SPD does not take into account negative effects on the residents of Cosgrove or the environment around the village</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer: A method of controlling size, height and footprint of units should definitely be applauded and implemented to prevent developers from building outside these guidelines Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?  Not Answered</p> <p>Please provide comments to support your answer:  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered</p> <p>Please provide comments to support your answer:  11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p>	<p>supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: It's puzzling why SNC accepted the site for development without first gathering any viewpoints from the residents. Could you help me understand why that happened?</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The infrastructure in and around Cosgrove feels already at- or over-capacity; there is no alternative access to Cosgrove Park, the A5/A508 roundabout is often congested, problems are made much worse if there are any issues with nearby main roads such as the M1. As a resident and regular user of these routes don't believe they are fit for any more traffic demands without considerable upgrade. Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made</p>		
SPD280	C Peacock	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Not Answered Please provide comments to support your answer:</p>	The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.	Strengthening wording has been added to the SPD to ensure that

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		<p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Not Answered Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities such as Cosgrave and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include matters of noise and odour where applicable.</p>	<p>issues such as noise and light are considered as part of the planning application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Large distribution sites offer little in the way of employment opportunities in terms of job volume and 24/7 operations in a residential area will be disruptive and unfair to local residents it makes little sense to compare warehousing sizes to the site situated on the M1 given the fundamental differences in residential proximity and vastly better infrastructure at this site compared to this proposal on the A508. Large increases to traffic will result in a worsening air quality for villages with special concern for the c.60 young children who attend Cosgrove Primary school with fears of increased asthma and other respiratory related issues. This traffic increase also poses a very real increase to danger and traffic related injuries given there is little in the way of road safety measures and</p>		

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		<p>controls in the proposal and the West Northants already admitting there is no budget for any controls to be added I fear the proposed scale will likely result in future injury or worse.</p> <p>Loss of nature and green space for future generations. There does not appear to be adequate surveys in terms of the impact to nature and animal habitats.</p> <p>A508 is not sufficient for this level of proposed traffic increase and traffic surveys conducted within the height of Covid and lockdowns are not representative of normalised traffic in this area, especially within holiday seasons as a large conduit road and the holiday park.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Sites considered should be low level small individual sites that are sufficiently spaced / controlled to ensure they cannot be merged into larger sites later down the line which would compound the issues mentioned above</p> <p>Care should be taken to landscape the area to protect the village from unsightly aspects, noise and smell</p> <p>Sites should be limited in operational hours 8.00 to 18.00 to further protect the peace of the close proximity residents</p> <p>Provisions for public amenities and open space should be included to support integration with the local residential population</p> <p>Any other comments</p>		

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		<p>14 Are there any other comments you wish to make which you have not already made?            Are there any other comments you wish to make which you haven't already made?:            How is it possible for such a large and invasive application can have been granted which will have huge detrimental impact to Cosgrove residents without a single Cosgrove resident having the opportunity to comment, protest or otherwise the application prior to it becoming unavoidable? At best this feels negligent and at worst a deliberately underhand approach to sneak through an application without any concern to those it actually impacts? How can the public have faith in the planning process if this is the approach taken?            It is difficult to see where sufficient care or planning has been taken in terms of the area being a flood prevention / overflow area? High water levels are infrequent but every 3-5 years has seen substantial volumes of water being managed through this site. How has this infrequent but large concern being considered in any application?</p>		
SPD28 1	M Hume	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?            No            Please provide comments to support your answer:            Major danger with A508 with vehicles turning into proposed estate</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?            No</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.            Provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  Don't think large units would be appropriate in this area  Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?  No  Please provide comments to support your answer:  Opportunities for country park and historic protection is good but roads and paths need to be safe. London Road and Towcester Road get overused especially when there are issues on A5 or M1. That issue has not been addressed despite local questions about safe ness for walkers and cyclists, including school students and people with disabilities.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?  No  Please provide comments to support your answer:  Above points are relevant  I believe there would need to be a safe approach tunnel to a business estate below the A508.  Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?  Not Answered  Please provide comments to support your answer:  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site</p>	<p>existing local services to help promote sustainable travel as well as the enhancement of pedestrian cycling and walking links</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>should be considered?  Not Answered  Please provide comments to support your answer:  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury  10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered  Please provide comments to support your answer:  11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?  Not Answered  Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove  12 Do you agree with the constraints and opportunities identified in respect of Site AL5?  Not Answered  Please provide comments to support your answer:  13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?  Not Answered  Please provide comments to support your answer:  Any other comments  14 Are there any other comments you wish to make which you have not already made?  Are there any other comments you wish to make which you haven't already made?:  Sorry not to comment about the other plans.</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Feeling that the plans including huge numbers of houses /buildings are over the top.Creating a proper new town with facilities including unblocked roads and pavements would be more appropriate</p>		
SPD28 2	R Purvey	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: Lack of consultation and not appropriate to local environment.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: Lack of consultation and not appropriate to local environment. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury  10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered</p> <p>Please provide comments to support your answer:  11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove  12 Do you agree with the constraints and opportunities identified in respect of Site AL5?  No</p> <p>Please provide comments to support your answer:  -Environmental impact  -Highway impact  -Appearance  -Impact on conservation  13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p>		design standards.'

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No</p> <p>Please provide comments to support your answer:</p> <ul style="list-style-type: none"> <li>-Environmental impact</li> <li>-Highway impact</li> <li>-Appearance</li> <li>-Impact on conservation</li> </ul> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>Lack of communication and consultation regarding plans</p>		
		<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will</p>

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		<p>Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>Please provide comments to support your answer: 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer:</p>	<p>There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy.</p> <p>As part of the planning application process, any adverse impacts on communities such as Blisworth and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Provision of new footpaths and cycleways that link to existing networks; and good accessibility to</p>	<p>seek to encourage/steer applicants towards more ambitious design standards.'</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: Response to consultation on South Northamptonshire Local Plan Part 2, Employment Allocations. Supplementary Planning Document Blisworth Parish Council have discussed the application at public meetings on 1 August 2022 and wish to submit the following representation in response to the public consultation. Blisworth Parish Council is open and supportive of providing areas of the county for development for employment, however we believe that this needs to be complementary to rural villages and should not cause material harm. We have concerns surrounding proposed increases in industrial development density south of Northampton, surrounding Towcester and east of Old Stratford. We would like to make the following points for consideration: 1. We have found that there is a significant increase in the number of proposals to provide warehousing in South Northamptonshire which primarily attracts low skilled workers to the region. Could there be an aim to bring other forms of employment to the region beyond warehousing and distribution</p>	<p>public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of pedestrian cycling and walking links.</p>	

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		<p>and encourage other forms of employment for the locality. As South Northamptonshire currently has low unemployment levels, we believe that this would build local skills and capability in our communities for the future. We have seen increasing numbers of large developments of warehousing and distribution facilities which have limited economic benefit to our communities. We would like the local plan to develop industries beyond the low skilled roles in distribution and encourage the development of local talent in partnership with our Schools, colleges, and universities. This in turn would inspire school leavers and young people to settle within the county rather than look beyond our boundaries for higher skilled employment. We find currently that workers are travelling from beyond the county, in cars, thereby increasing the traffic issues this style of development attracts. We believe that the current focus on distribution facilities is significantly increasing HGV traffic movements across the county.</p> <p>2. Often these facilities are of scale which is not appropriate to protecting the rural landscape often with proposed units exceeding 18m high. This proposal aims to limit future development to 16m, but the widespread opinion is that this is too high and should be limited to 12m as to not impact the rural views across South Northamptonshire. Often these larger scale developments are significantly altering the landscape and views across the county countryside particularly along the transport corridors of the M1, A43 and A45.</p>		

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		<p>3. Blisworth like many of the county's villages is a rural settlement of approx. 1000 buildings largely comprising a conservation area with several prominent listed buildings, of which many are situated alongside the primary routes that traffic uses to access these development areas. The protection of Blisworth's rural, visual, historic, and archaeological qualities is supported by Local Plan. It was recognised by the Highways Authority and Northamptonshire County Council in 1995 that the village was unsuitable for HGV traffic when the village was bypassed creating the A43. We have found that increasing developments south of Northampton, surrounding Towcester and east of Old Stratford force traffic to use the rural road network as "cut throughs", particularly where major trunk roads are congested or blocked. Any proposal must consider the cumulative effect on the rural road network and the fact that the junctions and routes are unsuited to HGV traffic (Appendix A)</p> <p>4. Blisworth, as with other smaller Parishes is blighted with traffic using the village as a cut through from Northampton and Milton Keynes to the A43/M1 and A508. This issue has been identified as one of the Policing Regional team's strategic priorities. We have seen significant increasing traffic movements and lack of compliance with speed limits through the village despite investment, and this causes issues as footpaths are close to and not protected from the traffic in the highway. There are many restrictions on the rural highway that cause hazards for example, the rail bridge on the Northampton Road</p>		

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		<p>outside Blisworth brings cycle and pedestrian traffic adjacent to the highway and represents a significant hazard. At present there are c5000 traffic movements every day through the centre of our village and this continues to grow, equating to c1.8 million journeys over an annual period.</p> <p>5. West Northamptonshire Council have installed traffic signage routing HGV traffic away from the route through Blisworth and Milson Manor at the Mereway roundabout in Northampton as an active control policy. These signs are hidden in the clutter of the street signage and are fairly ineffective at preventing HGV traffic using the route through Hunsbury, Milton Malsor and Blisworth to connect with the A43. The purpose of directing traffic along the trunk roads and not through the rural road network is to protect heritage and listed buildings adjacent the highway in Blisworth and for residents using local facilities such as the village shop, Primary School and public house. We believe that the local plan needs to take account of improvements at critical junctions to direct traffic along the major trunk roads and not through the rural road network.</p> <p>6. Any development proposals require adequate cycle, pedestrian, and bus access to the site for workers. Often, we have seen developments proposed which prevent access to the site by cycle due to the absence of cycle ways beyond the immediate development; and a limited bus services only operates between 0800 and 1800 at two hourly intervals and would therefore be unsuitable for many of the proposed employees utilising these proposed</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>locations. The footpaths are also narrow and poorly lit from rural locations. As our county has low unemployment levels. We therefore believe that a) any development would have limited economic benefit to the villages and b) that workers would travel from further afield, in cars, thereby increasing the traffic issues already identified.</p> <p>7. Often WNC considers any application in isolation and misses the context of the many other developments underway or planned in the area which will impact rural communities. We consider that it is essential that the cumulative impact is considered alongside the expansion in housing and industrial use South of Northampton Town and North of Towcester by the Council when considering individual proposals.</p> <p>We would also raise a strong concern around the ongoing practice of developers gaining permission and subsequently applying for alterations to the application. We are concerned that any agreement to develop these identified areas could be subject to future expansion and the resulting traffic impact.</p> <p>If WNC are minded in considering individual applications to develop the areas identified in the Local Plan there would need to be significant investment in the highways infrastructure locally including footpaths using instruments such as the former 106 agreement/CIL levies. As I am sure you agree there would undoubtedly be a significant need to upgrade and improve all the local roads, junctions, signage and pedestrian and cycle networks throughout the rural network to support this proposed local plan.</p> <p>For on Behalf of Blisworth Parish Council</p>		

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		<p>Appendix A – Road Traffic Photographic Examples (as your survey would not allow the uploading of photos/images. Appendix A has been submitted via your contact email <a href="mailto:localplanconsultation.snc@westnorthants.gov.uk">localplanconsultation.snc@westnorthants.gov.uk</a>.</p>		
SPD28 4	C Hooper	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: Impact to the environment Impact on the highway network Noise especially at night Disturbance Impact on trees, listed buildings &amp; conservations areas Reduction of Public open space</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: Impact to the environment Impact on the highway network Noise especially at night Disturbance Impact on trees, listed buildings &amp; conservations areas Reduction of Public open space Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer:</p>	As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include matters such as heritage, trees, open space.	A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more

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		<p>Impact to the environment  Impact on the highway network  Noise especially at night  Disturbance  Impact on trees, listed buildings &amp; conservations areas  Reduction of Public open space  7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?  No  Please provide comments to support your answer:  Impact to the environment  Impact on the highway network  Noise especially at night  Disturbance  Impact on trees, listed buildings &amp; conservations areas  Reduction of Public open space  Your comments about Site AL2 - Land at Woolgrowers Field, Towcester  8 Do you agree with the constraints and opportunities identified in respect of Site AL2?  No  Please provide comments to support your answer:  Impact to the environment  Impact on the highway network  Noise especially at night  Disturbance  Impact on trees, listed buildings &amp; conservations areas  Reduction of public open space  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site</p>		ambitious design standards.'

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>should be considered?  No  Please provide comments to support your answer:  Impact to the environment  Impact on the highway network  Noise especially at night  Disturbance  Impact on trees, listed buildings &amp; conservations areas  Reduction of public open space  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  No  Please provide comments to support your answer:  Impact to the environment  Impact on the highway network  Noise especially at night  Disturbance  Impact on trees, listed buildings &amp; conservations areas  Reduction of public open space</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?  No  Please provide comments to support your answer:  Impact to the environment  Impact on the highway network  Noise especially at night  Disturbance  Impact on trees, listed buildings &amp; conservations areas  Reduction of public open space</p>		

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		<p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Impact to the environment Impact on the highway network Noise especially at night Disturbance Impact on trees, listed buildings &amp; conservations areas Reduction of public open space</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Impact to the environment Impact on the highway network Noise especially at night Disturbance Impact on trees, listed buildings &amp; conservations areas Reduction of public open space Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		
SPD28 5	B Bourner	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes Please provide comments to support your answer:</p>	The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).	Strengthening wording has been added to

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No Comment</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: I do not agree with any of the design proposals for the AL5 site Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer: No Comment</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No Comment</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer: No Comment</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p>	<p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.</p> <p>There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy. The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be</p>	<p>the SPD to ensure that issues such as noise and light are considered as part of the planning application process. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will</p>

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		<p>No Please provide comments to support your answer: No Comment Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: No Comment 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No Comment Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: I strongly disagree that the proposed 'delivered objectives' will be met in respect of AL5. The opportunities outlined in these objectives do not correlate with the intended proposals put forward. In regards to objectives 1 &amp; 2: 'To facilitate economic growth encouraging investment and job creation, aligning training with employers' requirements to get more people into work and reduce levels of unemployment. '</p>	<p>consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This includes ecological matters and issues of residential amenity.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.</p>	<p>seek to encourage/steer applicants towards more ambitious design standards.</p>

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		<p>'To deliver appropriate new employment opportunities in both the urban and rural areas, including home-based working and extended employment areas, facilitated by high-speed broadband. '</p> <p>I have serious concerns as to who the jobs are being created for &amp; how these developments will benefit our local economy, investment opportunities and reduce unemployment in this area.</p> <p>Setting aside the skilled work created for erecting these commercial units on this site (which will be short term), what &amp; how many long term positions will be created and who will they benefit?</p> <p>The proposals currently outline plans for satellite distribution centres which will mainly rely on automated technology as opposed to human based labour, suggesting the creation of jobs will be minuscule in respect of what these developments are proposed to offer.</p> <p>Objective 2 also mentions the delivering of new home-based employment - If these developments will create jobs for people to work remotely, surely this will not necessarily benefit local residents who are subject to living near these commercial units, but instead open up employment to beyond the surrounding area, therefore AL5 will not be in the interest of inhabitants nearby or greatly benefit the local economic growth.</p> <p>Regarding Objective 9:</p> <p>To conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes</p>		



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		<p>It is unacceptable to state that the allocation of 16 hectares of green land to be developed in the proposed plans will in any way conserve the tranquillity of the natural &amp; built environment in this local area. Much of the land on this proposed site has long since been used for grazing whilst acting as an unofficial overspill to the bordering nature reserve, thus supporting the local ecosystem which would then be dramatically affected (in many cases destroyed) by these developments.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>My comments &amp; concerns in relation to the allocation of the Furtho Pit area of Cosgrove / Old Stratford for future development are listed below:</p> <p>Local traffic impacts &amp; Road Safety:</p> <p>With the A508 &amp; A5 providing major connective road links between Northampton, Milton Keynes &amp; beyond whilst also stepping up as the main diversion route when the local M1 junctions are closed, these highways are already overrun with high amounts of congestion day &amp; night resulting in plentiful traffic jams on a regular basis. I cannot see how the addition of even more vehicles on these roads as a result of this development could be permitted in an area that already suffers from high traffic volumes.</p> <p>With the impending slow moving HGV's that will be utilising these routes on a 24hr basis to access the warehouses in AL5 for the distribution of goods,</p>		

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		<p>along with a number of workers travelling to the workplace by road, this will certainly result in disruption, increased travel congestion &amp; worsened safety for all road users.</p> <p>Pollution:</p> <p>Both during &amp; after construction of the warehouses, there is going to be a dramatic increase in the local pollution counts that will affect local residents.</p> <p>The idea that these centres will be operating 24hrs a day is a big cause for concern in a number of ways:</p> <p>Firstly, this suggests a need for artificial lighting to be put in place. In comparison to what is currently a very dimly lit area with roads &amp; pathways relying mainly on natural light in the majority of the AL5 site surroundings, this development will result in a vast increase in light pollution.</p> <p>Secondly, the amount of noise pollution created as a result of both building (for however long they are in construction for) &amp; then the numerous noises created once these warehouses are occupied in (e.g. loading, unloading &amp; dispatching of goods) what is otherwise an area of mostly tranquil quiet countryside, there will be a noticeable difference in noise levels here, thus creating disturbance to local residents (potentially without letup).</p> <p>The construction and there after use of this site will also result in increased dust pollution.</p> <p>Depending on what occupies these buildings, there is added potential for unpleasant odours to be distributed in the surrounding area.</p> <p>Also relating to my point above regarding traffic impacts- this will also cause an increase in both noise, odour &amp; air pollution from the increased vehicles</p>		

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		<p>in the local vicinity.  All of these factors are likely to have a serious affect on the health &amp; well-being of local residents who live opposite &amp; nearby to this site.  Biodiversity:  The local ecosystem will most definitely suffer from this development. There is an abundance of wildlife residing in the local area with , &amp;  Red Kites to name a few that live here. Felling of trees &amp; shrubbery will not only affect the natural landscape of flora &amp; fauna but will completely destroy numerous habitats as a consequence of building these warehouses.  Height of proposed building:  The current plans do not seem to have taken into consideration that the proposed buildings will not be in-keeping with the currents buildings on Stratford road which are only 20m away from the development footprint. The majority of buildings on this stretch of Stratford Road are made up of low level 1 storey dwellings, therefore the idea of warehouses with an eaves height of 15m will tower over the neighbouring properties causing a dramatic loss of natural light whilst visually impairing &amp; detracting from the current street scene which is made up of meadows &amp; small villages.  Overall, I strongly object to the proposed development on this location, it will not be beneficial the local residents or surrounding area for this to be approved.  Any other comments  14 Are there any other comments you wish to make which you have not already made?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		Are there any other comments you wish to make which you haven't already made?:		
SPD286	D Williams	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes Please provide comments to support your answer: The methodology of the design principles are correct. However, as in the case of the land designated as NN302640 (classified as woodland in earlier iterations of your documentation) the core data is not bona fide and sound. despite repeated notification of error, SNC/WNC continue to use flawed data.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer: AS above WNC needs to base its future planning decisions on accurate and checked data. Using flawed data will always compromise the integrity of entire plans. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer: No comment</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	No changes necessary.

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		<p>Not Answered Please provide comments to support your answer: No comment Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer: No comment</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: No comment Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer: No comment</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: No comment Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Not Answered Please provide comments to support your answer: No comment</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: No comment Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: The mapping reference that WNC is currently flawed. There is no process of due diligence in place to check the accuracy of specific land status. When in doubt about land status, WNC employs an evaluation process based on entirely speculative and subjective opinion. The process itself is fundamentally flawed and demonstrated a complete lack of objective evaluation against the accepted principles of materiality.</p>		
SPD28 7	G Becks	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes Please provide comments to support your answer: No Comment</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy,</p>	<p>A design principle has been added that directly addresses the need for high quality</p>

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		<p>the methodology that has been used?  No  Please provide comments to support your answer:  I do not agree with any of the design proposed for AL5  Your comments about Site AL1 -Land at Bell Plantation, Towcester  6 Do you agree with the constraints and opportunities identified in respect of Site AL1?  No  Please provide comments to support your answer:  No Comment  7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?  No  Please provide comments to support your answer:  No Comment  Your comments about Site AL2 - Land at Woolgrowers Field, Towcester  8 Do you agree with the constraints and opportunities identified in respect of Site AL2?  No  Please provide comments to support your answer:  No Comment  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?  No  Please provide comments to support your answer:  No Comment</p>	<p>provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.</p> <p>There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy.</p> <p>The objectives are as defined in the Local Plan Part 2.  A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will</p>	<p>building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: No Comment</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No Comment</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: I do not agree in any way that the proposed 'delivered objectives' will be met in respect of AL5. The opportunities outlined in these objectives do not correlate with the intended proposals put forward. In regards to objectives 1 &amp; 2: To facilitate economic growth encouraging investment and job creation, aligning training with employers' requirements to get more people into work and reduce levels of unemployment. To deliver appropriate new employment opportunities in both the urban and rural areas, including home-based working and extended employment areas, facilitated by high-speed broadband.</p>	<p>need to mitigated to the satisfaction of the decision maker. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual</p>	



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		<p>I have serious concerns as to who the jobs are being created for &amp; how these developments will benefit our local economy, investment opportunities and reduce unemployment in this area.</p> <p>Setting aside the skilled work created for erecting these commercial units on this site (which will be short term), what &amp; how many long term positions will be created and who will they benefit?</p> <p>The proposals currently outline plans for satellite distribution centres which will mainly rely on automated technology as opposed to human based labor, suggesting the creation of jobs will be minuscule in respect of what these developments are proposed to offer.</p> <p>Objective 2 also mentions the delivering of new home-based employment - If these developments will create jobs for people to work remotely, surely this will not necessarily benefit local residents who are subject to living near these commercial units, but instead open up employment to beyond the surrounding area, therefore AL5 will not be in the interest of inhabitants nearby or greatly benefit the local economic growth.</p> <p>Moving on to objective 9:</p> <p>To conserve the tranquility of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes</p> <p>It is unacceptable to state that the allocation of 16 hectares of green land to be developed in the proposed plans will in any way conserve the tranquility of the natural &amp; built environment in this local area. Much of the land on this proposed site has long since been used for grazing whilst acting as an</p>	<p>properties which are identified will need to be mitigated to the satisfaction of the decision maker. This includes matters of ecology and residential amenity.</p>	

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		<p>unofficial overspill to the bordering nature reserve, thus supporting the local ecosystem which would then be dramatically affected (in many cases destroyed) by these developments.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: Please read my comments &amp; concerns in relation to the allocation of the Furtho Pit area of Cosgrove / Old Stratford for future development below:</p> <p>Local traffic impacts &amp; Road Safety: With the A508 &amp; A5 providing major connective road links between Northampton, Milton Keynes &amp; beyond whilst also stepping up as the main diversion route when the local M1 junctions are closed, these highways are already overrun with high amounts of congestion day &amp; night resulting in plentiful traffic jams on a regular basis. I cannot see how the addition of even more vehicles on these roads as a result of this development could be permitted in an area that already suffers from high traffic volumes.</p> <p>With the impending slow moving HGV's that will be utilising these routes on a 24hr basis to access the warehouses in AL5 for the distribution of goods, along with a number of workers travelling to the workplace by road, this will certainly result in disruption, increased travel congestion &amp; worsened safety for all road users.</p> <p>Pollution:</p>		

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		<p>Both during &amp; after construction of the warehouses, there is going to be a dramatic increase in the local pollution counts that will affect local residents.</p> <p>The idea that these centres will be operating 24hrs a day is a big cause for concern in a number of ways:</p> <p>Firstly, this suggests a need for artificial lighting to be put in place. In comparison to what is currently a very dimly lit area with roads &amp; pathways relying mainly on natural light in the majority of the AL5 site surroundings, this development will result in a vast increase in light pollution.</p> <p>Secondly, the amount of noise pollution created as a result of both building (for however long they are in construction for) &amp; then the numerous noises created once these warehouses are occupied in (e.g. loading, unloading &amp; dispatching of goods) what is otherwise an area of mostly tranquil quiet countryside, there will be a noticeable difference in noise levels here, thus creating disturbance to local residents (potentially without letup).</p> <p>The construction and there after use of this site will also result in increased dust pollution.</p> <p>Depending on what occupies these buildings, there is added potential for unpleasant odours to be distributed in the surrounding area.</p> <p>Also relating to my point above regarding traffic impacts- this will also cause an increase in both noise, odour &amp; air pollution from the increased vehicles in the local vicinity.</p> <p>All of these factors are likely to have a serious affect on the health &amp; well-being of local residents who live opposite &amp; nearby to this site.</p> <p>Biodiversity:</p>		

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		<p>The local ecosystem will most definitely suffer from this development. There is an abundance of wildlife residing in the local area with &amp; Red Kites to name a few that live here. Felling of trees &amp; shrubbery will not only affect the natural landscape of flora &amp; fauna but will completely destroy numerous habitats as a consequence of building these warehouses.</p> <p>Height of proposed building: The current plans do not seem to have taken into consideration that the proposed buildings will not be in-keeping with the current buildings on Stratford road which are only 20m away from the development footprint. The majority of buildings on this stretch of Stratford Road are made up of low level 1 storey dwellings, therefore the idea of warehouses with an eaves height of 15m will tower over the neighbouring properties causing a dramatic loss of natural light whilst visually impairing &amp; detracting from the current street scene which is made up of meadows &amp; small villages.</p> <p>Overall, I strongly object to the proposed development on this location, it will not be beneficial the local residents or surrounding area for this to be approved.</p> <p>Any other comments 14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		
SPD288	H A Becks	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes</p>	The scope of the SPD is to establish general guidance and design	Strengthening wording has been

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		<p>Please provide comments to support your answer: No Comment</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No</p> <p>Please provide comments to support your answer: I do not agree with any of the design proposed for AL5 Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No</p> <p>Please provide comments to support your answer: No Comment</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: No Comment</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p> <p>Please provide comments to support your answer: No Comment</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site</p>	<p>principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>The objectives are taken from the Local Plan Part 2. The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the</p>	<p>added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document</p>

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		<p>should be considered? No Please provide comments to support your answer: No Comment Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: No Comment 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No Comment Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: I do not agree in any way that the proposed 'delivered objectives' will be met in respect of AL5. The opportunities outlined in these objectives do not correlate with the intended proposals put forward. In regards to objectives 1 &amp; 2: To facilitate economic growth encouraging investment and job creation, aligning training with employers' requirements to get more people into work and reduce levels of unemployment.</p>	<p>development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will</p>	<p>that will seek to encourage/steer applicants towards more ambitious design standards.'</p>

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		<p>To deliver appropriate new employment opportunities in both the urban and rural areas, including home-based working and extended employment areas, facilitated by high-speed broadband.</p> <p>I have serious concerns as to who the jobs are being created for &amp; how these developments will benefit our local economy, investment opportunities and reduce unemployment in this area.</p> <p>Setting aside the skilled work created for erecting these commercial units on this site (which will be short term), what &amp; how many long term positions will be created and who will they benefit?</p> <p>The proposals currently outline plans for satellite distribution centres which will mainly rely on automated technology as opposed to human based labour, suggesting the creation of jobs will be minuscule in respect of what these developments are proposed to offer.</p> <p>Objective 2 also mentions the delivering of new home-based employment - If these developments will create jobs for people to work remotely, surely this will not necessarily benefit local residents who are subject to living near these commercial units, but instead open up employment to beyond the surrounding area, therefore AL5 will not be in the interest of inhabitants nearby or greatly benefit the local economic growth.</p> <p>Moving on to objective 9:</p> <p>To conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes</p>	<p>need to mitigated to the satisfaction of the decision maker.</p>	

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		<p>It is unacceptable to state that the allocation of 16 hectares of green land to be developed in the proposed plans will in any way conserve the tranquillity of the natural &amp; built environment in this local area. Much of the land on this proposed site has long since been used for grazing whilst acting as an unofficial overspill to the bordering nature reserve, thus supporting the local ecosystem which would then be dramatically affected (in many cases destroyed) by these developments.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: Please read my comments &amp; concerns in relation to the allocation of the Furtho Pit area of Cosgrove / Old Stratford for future development below:</p> <p>Local traffic impacts &amp; Road Safety: With the A508 &amp; A5 providing major connective road links between Northampton, Milton Keynes &amp; beyond whilst also stepping up as the main diversion route when the local M1 junctions are closed, these highways are already overrun with high amounts of congestion day &amp; night resulting in plentiful traffic jams on a regular basis. I cannot see how the addition of even more vehicles on these roads as a result of this development could be permitted in an area that already suffers from high traffic volumes.</p> <p>With the impending slow moving HGV's that will be utilising these routes on a 24hr basis to access the warehouses in AL5 for the distribution of goods,</p>		



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		<p>along with a number of workers travelling to the workplace by road, this will certainly result in disruption, increased travel congestion &amp; worsened safety for all road users.</p> <p>Pollution:</p> <p>Both during &amp; after construction of the warehouses, there is going to be a dramatic increase in the local pollution counts that will affect local residents.</p> <p>The idea that these centres will be operating 24hrs a day is a big cause for concern in a number of ways:</p> <p>Firstly, this suggests a need for artificial lighting to be put in place. In comparison to what is currently a very dimly lit area with roads &amp; pathways relying mainly on natural light in the majority of the AL5 site surroundings, this development will result in a vast increase in light pollution.</p> <p>Secondly, the amount of noise pollution created as a result of both building (for however long they are in construction for) &amp; then the numerous noises created once these warehouses are occupied in (e.g. loading, unloading &amp; dispatching of goods) what is otherwise an area of mostly tranquil quiet countryside, there will be a noticeable difference in noise levels here, thus creating disturbance to local residents (potentially without letup).</p> <p>The construction and there after use of this site will also result in increased dust pollution.</p> <p>Depending on what occupies these buildings, there is added potential for unpleasant odours to be distributed in the surrounding area.</p> <p>Also relating to my point above regarding traffic impacts- this will also cause an increase in both noise, odour &amp; air pollution from the increased vehicles</p>		

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		<p>in the local vicinity.  All of these factors are likely to have a serious affect on the health &amp; well-being of local residents who live opposite &amp; nearby to this site.</p> <p>Biodiversity:  The local ecosystem will most definitely suffer from this development. There is an abundance of wildlife residing in the local area with , &amp; Red Kites to name a few that live here. Felling of trees &amp; shrubbery will not only affect the natural landscape of flora &amp; fauna but will completely destroy numerous habitats as a consequence of building these warehouses.</p> <p>Height of proposed building:  The current plans do not seem to have taken into consideration that the proposed buildings will not be in-keeping with the currents buildings on Stratford road which are only 20m away from the development footprint. The majority of buildings on this stretch of Stratford Road are made up of low level 1 storey dwellings, therefore the idea of warehouses with an eaves height of 15m will tower over the neighbouring properties causing a dramatic loss of natural light whilst visually impairing &amp; detracting from the current street scene which is made up of meadows &amp; small villages.</p> <p>Overall, I strongly object to the proposed development on this location, it will not be beneficial the local residents or surrounding area for this to be approved.</p> <p>Any other comments  14 Are there any other comments you wish to make which you have not already made?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		Are there any other comments you wish to make which you haven't already made?:		
SPD289	Mr B Bourner	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes Please provide comments to support your answer: No Comment</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: I disagree with all of the design proposals for the AL5 site Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer: No Comment</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No Comment Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No</p>	<p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment.</p> <p>There is a high employment rate across the West Northamptonshire area. However the maintenance and delivery of new employment space is essential to maintain this trend and to ensure we maintain a strong and competitive economy. The objectives are taken from the Local Plan Part 2 which allocates the sites for employment purposes. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer: No Comment</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: No Comment</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>Please provide comments to support your answer: No Comment</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: No Comment</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: I strongly disagree that the proposed objectives will be met in respect of AL5. The opportunities outlined in these objectives do not correlate with the intended proposals put forward.</p>	<p>throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This includes matters of ecology and amenity.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p> <p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken</p>

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		<p>With regards to objectives 1 &amp; 2:</p> <p>'To facilitate economic growth encouraging investment and job creation, aligning training with employers' requirements to get more people into work and reduce levels of unemployment. '</p> <p>'To deliver appropriate new employment opportunities in both the urban and rural areas, including home-based working and extended employment areas, facilitated by high-speed broadband. '</p> <p>I have serious concerns as to who the jobs are being created for &amp; how these developments will benefit our local economy, investment opportunities and reduce unemployment in this area.</p> <p>Setting aside the skilled work created for erecting these commercial units on this site (which will be short term), what &amp; how many long term positions will be created and who will they benefit?</p> <p>The proposals currently outline plans for satellite distribution centres which will mainly rely on automated technology as opposed to human based labour, suggesting the creation of jobs will be minuscule in respect of what these developments are proposed to offer.</p> <p>Objective 2 also mentions the delivering of new home-based employment - If these developments will create jobs for people to work remotely, surely this will not necessarily benefit local residents who are subject to living near these commercial units, but instead open up employment to beyond the surrounding area, therefore AL5 will not be in the interest of inhabitants nearby or greatly benefit the local economic growth.</p> <p>Regarding Objective 9:</p>	<p>considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>To conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes</p> <p>It is unacceptable to state that the allocation of 16 hectares of green land to be developed in the proposed plans will in any way conserve the tranquillity of the natural &amp; built environment in this local area. Much of the land on this proposed site has long since been used for grazing whilst acting as an unofficial overspill to the bordering nature reserve, thus supporting the local ecosystem which would then be dramatically affected (in many cases destroyed) by these developments.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>My comments &amp; concerns in relation to the allocation of the Furtho Pit area of Cosgrove / Old Stratford for future development are listed below:</p> <p>Local traffic impacts &amp; Road Safety:</p> <p>With the A508 &amp; A5 providing major connective road links between Northampton, Milton Keynes &amp; beyond whilst also stepping up as the main diversion route when the local M1 junctions are closed, these highways are already overrun with high amounts of congestion day &amp; night resulting in plentiful</p>		

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		<p>traffic jams on a regular basis. I cannot see how the addition of even more vehicles on these roads as a result of this development could be permitted in an area that already suffers from high traffic volumes. With the impending slow moving HGV's that will be utilising these routes on a 24hr basis to access the warehouses in AL5 for the distribution of goods, along with a number of workers travelling to the workplace by road, this will certainly result in disruption, increased travel congestion &amp; worsened safety for all road users.</p> <p>Pollution:</p> <p>Both during &amp; after construction of the warehouses, there is going to be a dramatic increase in the local pollution counts that will affect local residents.</p> <p>The idea that these centres will be operating 24hrs a day is a big cause for concern in a number of ways:</p> <p>Firstly, this suggests a need for artificial lighting to be put in place. In comparison to what is currently a very dimly lit area with roads &amp; pathways relying mainly on natural light in the majority of the AL5 site surroundings, this development will result in a vast increase in light pollution.</p> <p>Secondly, the amount of noise pollution created as a result of both building (for however long they are in construction for) &amp; then the numerous noises created once these warehouses are occupied in (e.g. loading, unloading &amp; dispatching of goods) what is otherwise an area of mostly tranquil quiet countryside, there will be a noticeable difference in noise levels here, thus creating disturbance to local residents (potentially without letup).</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The construction and there after use of this site will also result in increased dust pollution.</p> <p>Depending on what occupies these buildings, there is added potential for unpleasant odours to be distributed in the surrounding area.</p> <p>Also relating to my point above regarding traffic impacts- this will also cause an increase in both noise, odour &amp; air pollution from the increased vehicles in the local vicinity.</p> <p>All of these factors are likely to have a serious affect on the health &amp; well-being of local residents who live opposite &amp; nearby to this site.</p> <p>Biodiversity: The local ecosystem will most definitely suffer from this development. There is an abundance of wildlife residing in the local area with , &amp; Red Kites to name a few that live here. Felling of trees &amp; shrubbery will not only affect the natural landscape of flora &amp; fauna but will completely destroy numerous habitats as a consequence of building these warehouses.</p> <p>Height of proposed building: The current plans do not seem to have taken into consideration that the proposed buildings will not be in-keeping with the currents buildings on Stratford road which are only 20m away from the development footprint. The majority of buildings on this stretch of Stratford Road are made up of low level 1 storey dwellings, therefore the idea of warehouses with an eaves height of 15m will tower over the neighbouring properties causing a dramatic</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>loss of natural light whilst visually impairing &amp; detracting from the current street scene which is made up of meadows &amp; small villages.</p> <p>Overall, I strongly object to the proposed development on this location, it will not be beneficial the local residents or surrounding area for this to be approved.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p>		
SPD290	G Feakin	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Section 4 of the draft SPD in orange references 4 employment sites, there are 5 noted and referenced within the same document.</p> <p>5.1 - not clear on the intent, no clear direct or vision to developers. This is not a design principle.</p> <p>Section 7.5 - remove word 'exceptional'</p> <p>Page 89 figure D in my opinion is a very uninspiring building and does not appear to be meeting the principles outlined in the document. Recommend reviewing some of the commercial buildings recently erected in the Nordics.</p> <p>Use of public transport - I have seen the frequency of public transport reduce over the years, often the timings not aligning to the operational hours or flexibility of employees. Should the use of public transport be relied upon - I see this as outside of the developers or companies ongoing control... and not</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>Provision of new footpaths and cycleways that link to existing networks; and good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of pedestrian cycling and walking links.</p>	<p>Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change.</p> <p>A design principle has been added that directly addresses the need for high quality building and</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>sustainable. The employees and contractors working at Grafton Regis hospital for example struggle with transport now. Existing public pathways and cycle ways and not maintained now with many routes being covered, poorly maintained, not connected or lit. It is unclear how this will be addressed via these principles in a sustained and on-going fashion.</p> <p>Looking at the recent droughts, should buildings now be part sunk to enhance area + reduce cooling/heating requirements? Should adjacent land be irrigated year round to lessen impacts of climate and provide year round environment for wildlife, avoid impact of flash floods etc.</p> <p>Suggested simple additional overarching principles to meet strategy and vision</p> <ol style="list-style-type: none"> <li>Demonstrate sustainable economic growth in area (key result and objective of development needs to ladder up to this).</li> <li>Demonstrate local employment needs being met.</li> <li>Show a reduction in out commuting</li> <li>Should not be over x and y in size</li> <li>Should achieve carbon neutral (zero) footprint from design phase through to operational use - we need to be clear on the ambition.</li> </ol> <p>....Should aim to be self sufficient and self contained in footprint in terms of electricity, cooling, water recycling...creating bio-diverse environments for fauna and flora such as green roofed buildings/bus stops, under solar/wind, battery storage, diversion routes for wildlife, EV charging points - based on # employed at site should give a guidance ratio for installation. For employee health &amp; wellbeing suggest installation of defibrillators. This is probably aimed</p>	<p>Additional wording will be added to the SPD to reflect the need to mitigate against the impacts of climate change.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards. Wording has been added in line with the Environment Agency's advice.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>at mid-size or site wide rather than small sized units. However there needs to be clear guidance and principles in place.</p> <p>g. companies to sponsor local football teams - it is not sufficient to provide a club/land without looking into the holistic sustainment of the venture. Too many grassroots clubs are failing yet they have the facilities due to upkeep, lack of volunteers, grounds maintenance, parents unable to afford strips etc.</p> <p>h. Companies to encourage employees to have x 'paid' community days per year in addition to holiday entitlement and bank holiday leave to contribute to local community and council area.</p> <p>f. Show which and how local supply chain is being enhanced and strengthened</p> <p>g. Schools programme - e.g. provide x work experience placements as well as the apprentices schemes for mid-size businesses</p> <p>h. Demonstrate connection/impact on local community</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Previous guidance was to provide small and medium business only. I am unclear as to the size of the small / medium units and the same in terms of the businesses being served now when reading this document versus supporting documentation. There appears to be ambiguity.</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>Yes</p> <p>Please provide comments to support your answer: In addition need to specify building height and provide EV charging points. Point 3A. Market evidence needs to be sourced post pandemic. Suggest lighting, pitch surfaces and maintenance outlined to provide year round facility.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: Does there need to be a contingency access road on to the A43 in the event of a emergency, road closure or another unforeseen disaster? Many times I've travelled along the A5 doing between 0-10mph due to an accident or closure on the M1 which has diverted traffic on the the A5. Typically a residential area of this size would have more than 1 exit onto a main road. 6.25 includes large buildings. 'AL' labelled sites were intended for small to medium buildings. Opportunity to link in with other schemes such as the jubilee canopy of trees. Appears to lack interconnecting footpaths to 'join' the areas up. Suggest new copse is included to break up area and increase employee well-being. Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No Please provide comments to support your answer: AL2 assessment to also reference flood plain to west of the site thanks.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Suggest new additional footpath along Towcester Road. Needs to identify opportunity to manage flood plain risk. Site was never intended for large buildings so feel it is misleading to developers to suggest they would be considered in exceptional circumstances and I'm unclear as to what those exceptional circumstances would be unless for instance it is for an F1 team as part of a centre of excellence establishment for example given the proximity to Silverstone or if it is for the development of sustainable manufacturing. Opportunity to enhance waterway for employee wellbeing. EV points for cars. Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  6.66 suggests large buildings could be considered. Again this is not in alignment with 'AL' pockets of land which were designated as S-M sized units. I feel this could be mis-leading to developers, cause unnecessary legal costs and local dis-trust following the previous consultations.  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove  12 Do you agree with the constraints and opportunities identified in respect of Site AL5?  No  Please provide comments to support your answer:  Flooding - 6.76 states flood risk, it should be noted that it is an issue rather than a risk requiring attention. The river banks are regularly breached each year.  Suggest opportunity and collaboration with Canal and River trust on this development.  13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?  No  Please provide comments to support your answer:  Note Development Framework 5 incorrectly identifies the area adjacent to the roundabout as Stony Stratford, it should be labelled as Old Stratford -  thank you.  Need to give consideration for noise and hours of operation considering residential houses located along Stratford Road.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Drainage - needs to cover the flood risk and management also for protection to site and wider area. There could be some good innovative use cases here.</p> <p>Suggest restriction of building height to align with the highest already in situ. Would caution large buildings for the same reasons previously given.</p> <p>Vehicle survey needs to inform infrastructure plans. A508 regularly sees traffic jams south bound, especially in the event of a closure of the M1. Similarly this area is extremely sensitive to any disruption in the wider grid network and bottlenecks are regularly felt in the surrounding villages and roads across Northamptonshire and Buckinghamshire.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>I'd like to see how this correlates to what West Northamptonshire would like to be known for and skills it wishes to retain and develop.</p> <p>It would be great to have clear guidance on businesses looking to be attracted such as start-ups. SMEs, engineering, innovation or the supply chain gaps needing to be plugged etc.</p>		
SPD29 1	A Peacock	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>Not Answered</p> <p>Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of</p>	<p>Additional wording has been added in line with the Environment Agency wording.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Not Answered Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester 6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer: 7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester 8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer: 9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p>	<p>out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: Large distribution sites usually offer limited job opportunities due to a high level of automation. Large numbers of vehicle movements will cause strain on the road network which is already at capacity in peak times. There would also be additional strain on the utilities networks which had not been anticipated eg drainage and sewerage. The area has extensive green areas with varied wildlife and animal habitats which have not been adequately considered and would be lost, as well as the public open space for wellbeing. There are many residents in the village including about 60 children at the primary school who have access to the area for recreational activities and learning opportunities. The area is a flood plain / prevention area, with high risk of causing wider issues if the area were developed, and causing a serious flooding risk to existing local housing. The site is not comparable to the M1 developments, as the A508/A5 road network is significantly less capable of supporting traffic volumes.</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

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		<p>There is already a confirmed lack of funding to invest in local dangerous road junctions and issues, therefore adding more traffic will add further issues and incidents. The traffic around Cosgrove is already highly seasonal with summer traffic to the caravan park, and the road network is already insufficient to support this traffic.</p> <p>There would be a large amount of light and noise pollution as a result of such an extensive excessive site.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: Smaller units would be more appropriate for the site, which do not require 24/7 access - both for vehicle access and also for the light/noise pollution not being created at nighttime.</p> <p>The proposed area is too large compared to the size of local residential areas etc, this should be reduced in order to protect the natural area and animal habitats. It is not comparable to the M1 developments with relation to the local amenities, areas of housing etc.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		
SPD29 2	A Becks	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p>	The Local Plan Part 2 seeks to meet employment needs across the full plan period (2011 – 2029).	A design principle has been added that

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		<p>No Comment</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: I do not agree with any of the design proposed for AL5 Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer: No Comment</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No Comment</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer: No Comment</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?</p>	<p>The purpose of the employment allocations in the Local Plan Part 2 was to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting as well as to help provide for local employment. A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual</p>	<p>directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards. The SPD will be amended to confirm that the heights are indicative</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>No Please provide comments to support your answer: No Comment Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: No Comment 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: No Comment Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: I do not agree in any way that the proposed 'delivered objectives' will be met in respect of AL5. The opportunities outlined in these objectives do not correlate with the intended proposals put forward. In regards to objectives 1 &amp; 2: To facilitate economic growth encouraging investment and job creation, aligning training with employers' requirements to get more people into work and reduce levels of unemployment.</p>	<p>information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe. As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker.</p>	<p>and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>To deliver appropriate new employment opportunities in both the urban and rural areas, including home-based working and extended employment areas, facilitated by high-speed broadband.</p> <p>I have serious concerns as to who the jobs are being created for &amp; how these developments will benefit our local economy, investment opportunities and reduce unemployment in this area.</p> <p>Setting aside the skilled work created for erecting these commercial units on this site (which will be short term), what &amp; how many long term positions will be created and who will they benefit?</p> <p>The proposals currently outline plans for satellite distribution centres which will mainly rely on automated technology as opposed to human based labour, suggesting the creation of jobs will be minuscule in respect of what these developments are proposed to offer.</p> <p>Objective 2 also mentions the delivering of new home-based employment - If these developments will create jobs for people to work remotely, surely this will not necessarily benefit local residents who are subject to living near these commercial units, but instead open up employment to beyond the surrounding area, therefore AL5 will not be in the interest of inhabitants nearby or greatly benefit the local economic growth.</p> <p>Moving on to objective 9:</p> <p>To conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes</p>	<p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning application process.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>It is unacceptable to state that the allocation of 16 hectares of green land to be developed in the proposed plans will in any way conserve the tranquillity of the natural &amp; built environment in this local area. Much of the land on this proposed site has long since been used for grazing whilst acting as an unofficial overspill to the bordering nature reserve, thus supporting the local ecosystem which would then be dramatically affected (in many cases destroyed) by these developments.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: Please read my comments &amp; concerns in relation to the allocation of the Furtho Pit area of Cosgrove / Old Stratford for future development below:</p> <p>Local traffic impacts &amp; Road Safety: With the A508 &amp; A5 providing major connective road links between Northampton, Milton Keynes &amp; beyond whilst also stepping up as the main diversion route when the local M1 junctions are closed, these highways are already overrun with high amounts of congestion day &amp; night resulting in plentiful traffic jams on a regular basis. I cannot see how the addition of even more vehicles on these roads as a result of this development could be permitted in an area that already suffers from high traffic volumes.</p> <p>With the impending slow moving HGV's that will be utilising these routes on a 24hr basis to access the warehouses in AL5 for the distribution of goods,</p>		

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		<p>along with a number of workers travelling to the workplace by road, this will certainly result in disruption, increased travel congestion &amp; worsened safety for all road users.</p> <p>Pollution:</p> <p>Both during &amp; after construction of the warehouses, there is going to be a dramatic increase in the local pollution counts that will affect local residents.</p> <p>The idea that these centres will be operating 24hrs a day is a big cause for concern in a number of ways:</p> <p>Firstly, this suggests a need for artificial lighting to be put in place. In comparison to what is currently a very dimly lit area with roads &amp; pathways relying mainly on natural light in the majority of the AL5 site surroundings, this development will result in a vast increase in light pollution.</p> <p>Secondly, the amount of noise pollution created as a result of both building (for however long they are in construction for) &amp; then the numerous noises created once these warehouses are occupied in (e.g. loading, unloading &amp; dispatching of goods) what is otherwise an area of mostly tranquil quiet countryside, there will be a noticeable difference in noise levels here, thus creating disturbance to local residents (potentially without letup).</p> <p>The construction and there after use of this site will also result in increased dust pollution.</p> <p>Depending on what occupies these buildings, there is added potential for unpleasant odours to be distributed in the surrounding area.</p> <p>Also relating to my point above regarding traffic impacts- this will also cause an increase in both noise, odour &amp; air pollution from the increased vehicles</p>		

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		<p>in the local vicinity.  All of these factors are likely to have a serious affect on the health &amp; well-being of local residents who live opposite &amp; nearby to this site.</p> <p>Biodiversity:  The local ecosystem will most definitely suffer from this development. There is an abundance of wildlife residing in the local area with , &amp; Red Kites to name a few that live here. Felling of trees &amp; shrubbery will not only affect the natural landscape of flora &amp; fauna but will completely destroy numerous habitats as a consequence of building these warehouses.</p> <p>Height of proposed building:  The current plans do not seem to have taken into consideration that the proposed buildings will not be in-keeping with the currents buildings on Stratford road which are only 20m away from the development footprint. The majority of buildings on this stretch of Stratford Road are made up of low level 1 storey dwellings, therefore the idea of warehouses with an eaves height of 15m will tower over the neighbouring properties causing a dramatic loss of natural light whilst visually impairing &amp; detracting from the current street scene which is made up of meadows &amp; small villages.</p> <p>Overall, I strongly object to the proposed development on this location, it will not be beneficial the local residents or surrounding area for this to be approved.</p> <p>Any other comments  14 Are there any other comments you wish to make which you have not already made?</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		Are there any other comments you wish to make which you haven't already made?:		
SPD293	D Little	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? Yes Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: The use of the Swan Valley units as the reference point for Large Units is inappropriate – comparing unit size to a site adjacent to the M1 and those by the A508 and in a residential area is not a sensible comparison. Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please provide comments to support your answer:  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury  10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered</p> <p>Please provide comments to support your answer:  11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?  Not Answered</p> <p>Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove  12 Do you agree with the constraints and opportunities identified in respect of Site AL5?  No</p> <p>Please provide comments to support your answer:  13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?  No</p> <p>Please provide comments to support your answer:  If the Stratford Road fields must be developed it should be small low level buildings in this area.</p>	<p>implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

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		<p>Warehousing provides little employment opportunity. Many operate autonomously in darkness.</p> <p>It should also be noted that offsetting the height of any buildings, using trees and plants, should be a last resort with building height to mitigate impact on local environment. Using treelines etc to offset ridge heights visually is not an acceptable way to make a ridge height acceptable in planning terms. The lowering of ground levels would be a suitable method of offsetting and in the case of AL5 can be achieved easily given the gradients across the site and along Old Stratford Road.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>It is my understanding that previous Local Plan had communications from the relevant highways authority which had stated that the Old Stratford roundabout was over capacity at peak times of use. Therefore, surely the introduction of additional traffic flow from any large development would have significant impact on the roundabout and surrounding infrastructure. Notwithstanding the M1 J15 rail terminal development which will only add to the capacity issues. Given this how can the AL5 development be considered with little or no works to reduce any capacity impact on the existing highway infrastructure? The Local Plan must have sufficient ability to be able to measure and justify the impact of the AL5 development for highways and environmental impact.</p>		

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SPD29 4	A Harrison	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? Yes Please provide comments to support your answer: Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? No Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? No Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No</p>	<p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p>	No changes necessary.

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		<p>Please provide comments to support your answer: Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury 10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No</p> <p>Please provide comments to support your answer: 11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove 12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No</p> <p>Please provide comments to support your answer: 13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No</p> <p>Please provide comments to support your answer: Any other comments 14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: I don't believe that the current plans are in the best interests of Towcester and it's residents. The increase in traffic will be considerable and will lead to</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>even more congestion. Without a bypass the town will become totally gridlocked.</p>		
SPD295	A Box	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: I don't think the design principles will support the highway network; the increased traffic will have a detrimental effect on this network which is not designed to sustain the kind of traffic that will come with such a development. This heightened traffic will have a serious impact to the village and the surroundings; increased noise pollution and ozone pollution. Along with the impact to the surrounding wildlife; this is going to have a direct effect on our surroundings, something which the village currently is know for and benefits from; attracting a wide variety of wildlife, this proposal will surely deplete this.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: I do not agree with these, they are not sympathetic to their surroundings, nor do they take into considering the infrastructure of the surroundings, and the negative impact to things such as the highway network, that are not built to sustain these proposals - there has clearly been no real consideration to this aspect, how negative it will be and how to negate the impact.</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to mitigated to the satisfaction of the decision maker.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Yes Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer:</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Yes Please provide comments to support your answer:</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Yes Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>should be considered?  Yes  Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove  12 Do you agree with the constraints and opportunities identified in respect of Site AL5?  No  Please provide comments to support your answer:  I do not agree with the opportunity identified. this is not a suitable location; it cannot sustain the proposed plan. for a number of reasons; the highways cannot sustain the increased traffic, and the noise pollution and odor pollution will have an impact on the surrounding wildlife along with the local residents  13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?  No  Please provide comments to support your answer:  Clearly, this plan has been put forward with no consideration for the surroundings and how this will handle the development, now or in the future. The results of this poor planning will not be felt by those that have made the decisions either; but the wildlife and residents, who will be left to deal with the problems forced on them through poor consideration of things like highways network, air pollution etc  Any other comments  14 Are there any other comments you wish to make which you have not already made?</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Are there any other comments you wish to make which you haven't already made?:</p> <p>Whilst I appreciate that progress cannot be stopped, it does not mean to say that it should be embraced irrespective of the cost to the environment we live in. Nor should it be rushed through simply because it can. These things require careful consideration and before any plans for site developments are considered, research should be conducted into the impact such developments would have on the surrounding areas, and what actions need to be taken in order to put the surrounding residents and environment in the same position, were the proposal to not go ahead. Ensuring that everyone benefits with no compromises. That goes for the wildlife, traffic, noise, smells, residential amenity, impact to trees, conservation areas, and public open spaces.</p> <p>Achieve this first, then put forward a plan for site development.</p>		
SPD29 6	S Bell	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Some of the design principles point tentatively in the right direction, but generally they go nowhere near far enough in limiting the visual impact of developments to a level which is acceptable given the nature of Towcester as a rural market town and to preserve the character and tranquility of the surrounding countryside. Development height should generally be limited to 7m; 10m at most and no more. The design principles totally fail to consider</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more</p>

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		<p>impact of any development on traffic congestion when that will be the most damaging impact of these developments; when taken cumulatively alongside existing plans and the frequent use of local roads as a diversionary route for the M1 they are both literally, and in development terms figuratively, a slow motion car crash on a grand scale. The principles allow far too much discretion to developers and this has already been shown to be an inadequate means of constraining unacceptable and grossly overscale proposals. The principles provide no leverage at all to ensure that development results in the right sort of high skilled high wage employment which local educational attainment and economic growth demands. I agree that employment land in the Towcester area should ideally be developed to provide employment for people who live in the locality. That however implies the need for small scale buildings suitable for a large number of smaller businesses. Large warehouses would quickly take up the allocated land and provide minimal local employment. Large scale tall warehouse buildings should be confined to the numerous major warehouse parks around Northampton and adjacent to junctions 15,15a,16 and 17 of the M1 motorway; the SDP should prohibit their congregation around Towcester.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations,</p>	<p>appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a</p>

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		<p>The development principles are right to categorise small, medium and large units and to set out limits to the construction of large units, but again they fail to pin this down adequately and the restrictions on size they propose are too loose and insufficiently restrictive given the rural character of Towcester and the surrounding area, and the scale and mass of existing buildings. These principle will still permit development which is on far too grand and gross a scale.</p> <p>The SPD report defines medium sized buildings as having a footprint of between 2,500 sq. metres and 8,000 sq. metres and large buildings as having a footprint of at least 8,000 sq. metres with no maximum figure. However, there is no large building within this definition anywhere in the Towcester area: the only buildings of this size cited in the report are in the large scale Swan Valley industry/distribution estate alongside the M1 near Northampton, which is not in any respect a suitable comparator to the small and medium sized developments envisaged for these sites by the Part 2 Local Plan. Moreover, the maximum footprint of any present building on the Tove Valley Business Park and the Silverstone Park development, which are the only appropriate comparators for the AL1-AL5 sites, is 5,000 sq. metres, so this is a more suitable figure to adopt as the maximum footprint for a medium sized building.</p> <p>The whole scale envisaged by the SPD needs to be taken down by an order of magnitude.</p> <p>Having introduced the new category of large buildings and expanded the definition of medium sized buildings, the SPD report then recommends, under</p>	<p>meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p>	<p>proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>the heading of Building Height, Scale and Massing that medium sized buildings should be acceptable up to a height of 16 metres and that there should be a presumption that large buildings should be granted planning permission 'in exceptional circumstances', which are wholly undefined, except that they should be of high design quality and should be accompanied by a thorough programme of landscape measures. The report contains no reasoned justification for these proposed amendments to the existing guidelines set out in the Part 2 Local Plan.</p> <p>By introducing the express possibility of planning permission being granted for large buildings on these sites without any limit on their maximum size and by expanding the definition of a medium sized building, the report is increasing uncertainty and encouraging unsuitable applications, like the pending application of DHL for the AL1 site, which involves a building which is more than 18 metres high and has a footprint in excess of 110,000 sq. metres. WDC would still have a residual discretion to allow a planning application that fell outside its stated guidelines, if the SPD report was amended to delete all references to large buildings and to redefine medium sized buildings for the purposes of these guidelines as having a footprint of no more than 5,000 sq. metres and I strongly urge that these amendments should be made to the draft report before it is finalised. This amendment to the SPD report should omit all references to large buildings and redefine medium sized buildings as those which have a footprint of not more than 5,000 sq. metres.</p>		

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		<p>Alternatively the guidance could be amended to have a fourth category of 'very large' to reflect the strategic logistics settings of the district from above 15,000 m2 giving the large category defined limits. And further design planning changes will not allow these buildings to be joined up.</p> <p>Having set out that a very large category could exist the SPD should make clear that no very large units would be permitted on any of the AL sites 1-5.</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>The guidance offered is wholly inadequate, given the fact that local roads and in particular both the A5 and A43 are regularly very heavily congested as a result of present traffic volumes, without the added impact of any further development in the Towcester area. The pending DHL planning application for site AL1 includes a transport assessment which predicts that the development will generate 465 arrivals and departures of commercial vehicles in the 7am-9am rush hour and 355 more arrivals and departures of commercial vehicles in the 4pm-6pm rush hour. This could well be an underestimate and also does not predict traffic movements either between 9am and 4pm or outside normal working hours. If traffic movements in the 4 hours of rush hour are estimated by the applicants to be likely to generate 820 movements of commercial vehicles, traffic movements over a 24 hour period could amount to</p>		

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		<p>more than 2,000, or even 3,000 if they continue outside normal working hours. This would have a major adverse effect on traffic movements throughout the Towcester area which will be to the serious detriment of all local residents. The traffic implications of any new proposed development in or near Towcester should be a very important factor and a major constraint in deciding whether or not to grant planning permission and that any development that is likely to generate additional traffic movements comparable to those of the DHL pending application for Site AL1 should be refused planning consent on that ground alone, on the basis that the existing road network does not have the capacity to handle the additional traffic that would result from such development.</p> <p>Given the importance of the extent of additional road traffic generated by any proposed new development, the SPD should require any application to include details of the estimated traffic movements likely to be created by the new development and should give details of WNC's suggested maximum figures for new traffic generation and as well as conditions likely to be imposed on use of the site, for example a ban or restriction on 24 hour working.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer:</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Please see responses to sections 4 and 5 above. The scale of the development permitted by the proposed framework is excessively large, and will create ultimately self defeating traffic congestion which will inhibit economic development in Towcester and significantly reduce the quality of life for its residents and those of the surrounding area. The grossly overscale nature of what the Framework still potentially permits would mar the visual appearance of the town and viewpoints for miles around. something much more definitively restrictive of height and scale is required. The requirement for particularly sensitive development along the northern and north eastern sides of the site is welcomed but does not go far enough.</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Some of those identified are acceptable, for example the opportunity to provide a better frontage to the A5 road, but given the small nature of the site, the proposed limit on the height of development is too generous - it should be no more than 7m - and once again there is a total failure to consider the impact of traffic congestion. This site relies on access via the Greens Norton road to the A5/A43 roundabout and traffic already backs up whenever there is congestion on one or other of both those roads, which is a daily occurrence. The alternative route is though Greens Norton on totally unsuitable</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>country roads, past schools and a GP surgery. The impact of this will be cumulative with AL1 and AL3, and will leave the area in a regular state of gridlock.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Please see section 8 above Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? No Please provide comments to support your answer: Greater detail is required in the SPD in terms of the Cumulative Traffic Impact Assessment on the A5/A43 Tove/Abthorpe roundabouts and specifically through the villages of Whittlebury and Silverstone and along Cowpastures Lane. This is not just from the Local Plan 2 site allocations, but after the relief road is open, when the M1 is closed or has hold ups, when the Towcester Vale houses are completed, and once AL3 (which already has planning permission) is operating. The SPD needs to require that any planning applications for the sites must include a wide ranging Cumulative Traffic Assessment, not just an assessment on the access for the specified proposal. The AL4 (Shacks Barn) site is totally unsuited to HGV traffic as it has no</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>southbound access into the A43, meaning all vehicles travelling south will pass directly through Silverstone village or Whittlebury.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>The maximum ridge height for the buildings at AL4 should be 7 metres. This is because of its rural location and position on the Whittlewood Ridge which lends to far reaching visibility of the site. That is the precedent for the local area and would fit with the intent of the Local Plan (2) for small and medium sized units.</p> <p>Screening using trees must be large scale, not planted with the possibility of full screening only after 15 years. Further, maintenance must be legally binding and continuous until fully established (otherwise screening will go un-watered, die and not be replaced). Tree planting on top of bunds is unacceptable screening.</p> <p>The importance of all the proposed buildings and associated infrastructure (such as planting and drainage) needs to be within the allocation site area.</p> <p>This is of particular importance for AL4, where the developer has already attempted to increase the development site area by 28% through placing the drainage ponds outside of the allocated land area.</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? Not Answered Please provide comments to support your answer: I do not wish to comment on this aspect of the SPD</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: I do not wish to comment on this aspect of the SPD</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?: On page 24, para 3.2 'in part' should be removed from the role of the employment sites. These sites were never intended only as 'in part' for small, medium developments but rather, the WHOLE of the LP2 is for small and medium development. The proposals suggested will run contrary to the previously stated policy ambition of reducing out commuting for work. Far from preventing and reducing the number of residents who live in the district and work elsewhere, many of the proposals which will result from such an unconstrained approach for pick and pack operatives will required peopled to be bussed into the district who are non-resident. Any of the proposals that acknowledge this should be refused for the non-compliance to the existing policies.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Include all future development on AL3 within the scope of the SPD. This will include any changes, remodelling, extensions or changes to the existing planning permission that has been granted.</p> <p>No building should be taller than any existing building on or in close proximity to the site. For AL1 &amp; 2 this the existing Bell Plantation complex , Old Greens Norton Road area and Tove Valley Business Park area; for AL4 the existing units at the Silverstone Business Park give a good reference</p> <p>The SPD should give some guidance that future development will not allow for the combining of two or more smaller units to create units not envisaged in the SPD.</p> <p>The SPD should state that no single unit can take up more than 15% of the total area allocated in the South Northants Local Plan Part 2</p> <p>The SPD should state give some indications as to what a full and comprehensive traffic survey for each of these allocations would be to include the cumulative impacts and the impact when the M1 has issues and traffic migrates to the A5 and A508</p>		
SPD29 7	S McDonald	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer:</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1? Not Answered Please provide comments to support your answer:</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p> <p>Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Not Answered Please provide comments to support your answer:</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer:</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4? Not Answered Please provide comments to support your answer:</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This includes environmental impact and impact on communities such as Crosgrave as well as matters of health and well-being.</p>	<p>across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>Strengthening wording has been added to the SPD to ensure that issues such as noise and light are considered as part of the planning</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>should be considered?  Not Answered  Please provide comments to support your answer:  Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove  12 Do you agree with the constraints and opportunities identified in respect of Site AL5?  No  Please provide comments to support your answer:  The road infrastructure already struggles at peak times and school bus hours.  Any disruption causes 'gridlock' through Stony Stratford and Deanshanger.  If other housing is also being developed / Towster/ A5/ Pottersbury this will also need to be accommodated - not joined up thinking.  Noise and Light pollution to local Cosgrove residence - one of the few quiet places left to explore and calm your mental health in MK.  How will it impact wildlife? - Cosgrove has a returning and growing population of - they fly the headland / old canal banks.  Is there any local need for large units : many vacant ones at Kiln farm, huge new complex just off M1 in Roade?  13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered?  No  Please provide comments to support your answer:  Is there any local need for large units : many vacant ones at Kiln farm, huge new complex just off M1 in Roade  What are the units to be used for - holding logistic or 'robotic warehouses' won't benefit local community / employment.</p>		<p>application process.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Small business ventures / science parks . low-level/ low environmental impact with high employability / skill development for local youngsters = maybe.</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p> <p>Will these developments open 'floodgates' to building on more fields / greenspaces = for profit without the consideration to environmental disaster / climate change / local flooding ?</p>		
SPD298	W Barter	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these?</p> <p>Yes</p> <p>Please provide comments to support your answer:</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used?</p> <p>No</p> <p>Please provide comments to support your answer:</p> <p>Broadly agree. But there needs to be a new category of 'very large' building, as the 'large' category is now relatively small by national standards and precedent.</p> <p>Your comments about Site AL1 -Land at Bell Plantation, Towcester</p> <p>6 Do you agree with the constraints and opportunities identified in respect of Site AL1?</p> <p>No</p> <p>Please provide comments to support your answer:</p>	<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>The site is totally unsuitable for major development given its impact in terms of adding extra traffic at the Tove roundabout, which even now ceases to function effectively given any disruption on the associated roads. Witness Friday 12 August when traffic backing up from Towcester fouled the roundabout, at which everyone in every other flow stood foul of other routes, so that minor disruption at about 0900 became major very quickly and lasted most of the morning.</p> <p>7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Essential to consider not just traffic impacts from this site in isolation but also against the background of increased traffic from other sites. Your comments about Site AL2 - Land at Woolgrowers Field, Towcester</p> <p>8 Do you agree with the constraints and opportunities identified in respect of Site AL2? Yes Please provide comments to support your answer: Relatively small development with little impact except traffic, see below.</p> <p>9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer:</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Essential to consider not just traffic impacts from this site in isolation but also against the background of increased traffic from other sites. Note that the Greens Norton road serving this site is the first to suffer when the Tove roundabout is congested, as the exit from it is not signalled. On Friday 12 August traffic backed up on this road from the roundabout almost to the Rugby Club.</p> <p>Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury</p> <p>10 Do you agree with the constraints and opportunities identified in respect of Site AL4?</p> <p>No</p> <p>Please provide comments to support your answer: The lack of proper road access (i.e.) to/from the Brackley/M40 direction) to the A43 should make this development a non-starter.</p> <p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered?</p> <p>No</p> <p>Please provide comments to support your answer: Essential to consider not just traffic impacts from this site in isolation but also against the background of increased traffic from other sites.</p> <p>Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5?</p> <p>No</p> <p>Please provide comments to support your answer:</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>Traffic impacts are underestimated, together with the wider effects. The Old Stratford roundabout is the binding constraint on capacity of the A5 and A508.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: Essential to consider not just traffic impacts from this site in isolation but also against the background of increased traffic from other sites. Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made? Are there any other comments you wish to make which you haven't already made?:</p>		
SPD299	M Creaser	<p>4 The SPD sets out a number of overarching design principles. Do you agree with these? No Please provide comments to support your answer: Your wording isn't strong enough to steer development along your intended intent.</p> <p>5 The SPD considers the sites and future development with reference to small, medium and large units. Do you agree with this approach and the methodology that has been used? No Please provide comments to support your answer: 3 levels of scale is not sufficient, should include mega etc. Should include scales of employment as large buildings don't provide a high level of</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>employment.  Your comments about Site AL1 -Land at Bell Plantation, Towcester  6 Do you agree with the constraints and opportunities identified in respect of Site AL1?  Not Answered  Please provide comments to support your answer:  7 Do you agree that the Site Development Framework for AL1 sets an appropriate framework against which future development of the site should be considered?  Not Answered  Please provide comments to support your answer:  Your comments about Site AL2 - Land at Woolgrowers Field, Towcester  8 Do you agree with the constraints and opportunities identified in respect of Site AL2?  Not Answered  Please provide comments to support your answer:  9 Do you agree that the Site Development Framework for AL2 sets an appropriate framework against which future development of the site should be considered?  Not Answered  Please provide comments to support your answer:  Your comments about Site AL4 -Employment Land, Shacks Barn, Whittlebury  10 Do you agree with the constraints and opportunities identified in respect of Site AL4?  Not Answered  Please provide comments to support your answer:</p>	<p>stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>11 Do you agree that the Site Development Framework for AL4 sets an appropriate framework against which future development of the site should be considered? Not Answered Please provide comments to support your answer: Your comments about Site AL5 -Land at Former Furtho Pit, Old Stratford/Cosgrove</p> <p>12 Do you agree with the constraints and opportunities identified in respect of Site AL5? No Please provide comments to support your answer: This area should be considered as two sites. Furtho Pit adjacent to A508, is say a brown field site, ideal for development apart from the poor road network being a major bottleneck into MK. Stratford Road fields are pasture land across the old Stratford Road and should be considered separately. Why, this wording is wrong.. Para 13.3.6 of the development plan states "visibility economic investment on a site of poor environmental quality at a sustainable location" . You cannot say this about such pasture land. Your planning in this area is flawed.</p> <p>13 Do you agree that the Site Development Framework for AL5 sets an appropriate framework against which future development of the site should be considered? No Please provide comments to support your answer: The whole of Stratford Road to the village needs considering as the current AL5 development will probably include an access road enabling further</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>development towards the village, do you want this, how do you control it?</p> <p>Any other comments</p> <p>14 Are there any other comments you wish to make which you have not already made?</p> <p>Are there any other comments you wish to make which you haven't already made?:</p>		
SPD300	M Richardson	<p>Ref ALS - Land at Former Furtho Pit Old Stratford/Cosgrove</p> <p>To Whom it May concern</p> <p>I write in regard of the above with the following reservations as follows</p> <p>I am concerned about the above as we already have extreme problems in this area, you only need to be a commuter to understand the frustrations already in place trying to exit onto the A508 during normal heavy periods. We now find out that the area close to us without any consultation by any official body had been designated as industrial which can only add to the already congested situation.</p> <p>It is also extremely close to residential property which I feel will impair on our light, noise and fumes from the lorries that will be entering in and out of the site.</p> <p>If we are to be subjected to this development, would it not make sense to ensure that the office facilities are nearer the</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape</p>	<p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>bungalows, or the residential areas and the warehouses are situated further away from the bungalows.</p> <p>The site houses wildlife and these appear to have been given greater priority to their welfare than to the residents of the bungalows opposite.</p> <p>We are also concerned about the road infrastructure mainly the AS as at the southern end of this road there is already vast amounts of warehousing from which their lorries travel north to our end which is already impacting the Old Stratford roundabout. Therefore, any additional warehousing from our end is only going to make the situation worse and cause extra gridlock especially at peak times.</p> <p>I hope the matters raised above will be taken into consideration if this progresses as seems likely to a full application</p>	<p>design across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.'</p> <p>As part of the planning application process, any adverse impacts on communities and individual properties which are identified will need to be mitigated to the satisfaction of the decision maker. This will include any impact on bungalows where appropriate.</p>	<p>more ambitious design standards.'</p>
SPD30 1	H Cook	<p>Ref AL5 - Land at Former Furtho Pit Old Stratford/Cosgrove To Whom It May Concern:</p> <p>I write in regard of the above with the following reservations as follows.</p> <p>I am already concerned at the amount of traffic that passes through our village currently and feel that the above development will only add to the already heavy traffic.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. The Local Plan Part 2 was subject to a robust plan preparation process which was tested through an Examination in Public by the Planning Inspectorate.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed</p>	<p>No changes necessary.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>I also found out that the area close to us without any consultation by any official body has been designated as industrial land with the intention of it being used to house large warehouse outlets this I feel will only add to the already congested situation. In addition it is extremely close to residential property which I feel will impair on the light noise and fumes from the vehicles that will be entering the site.</p> <p>However if we were to be subjected to this development I would like to suggest that the office facilities are nearer to the residential end of the land and the warehouses are situated further back.</p> <p>The current road infrastructure A508 and A5 are already extremely busy and at peak times there is a backlog of traffic which I feel will only compound the current situation and result in a gridlock of traffic.</p> <p>These are my thoughts on the subject and I hope will be taken into consideration when looking at future planning applications</p>	<p>development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	
SPD30 2	WNC Ecology	<p>2. Within the overarching design principle section 5.3, I note that it states "Where possible contribute to the area's wider green network, including habitat corridors and linkages.", there are other ecology/biodiversity matters I think it would be worth considering here particularly given the Environment Act 2021 and the ecology matters present within the sites and/or zone of influence. For example;</p> <ol style="list-style-type: none"> <li>a. Each site should achieve a net gain in biodiversity of 10% in line with the mandate within the Environment Act that will come in</li> </ol>	<p>All ecological surveys will need to be taken as part of any future planning application.</p> <p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The SPD cannot introduce new policy however all policies within the development plan will be applicable including ecology policies.</p>	No changes necessary.

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>anyway in November 2023 following the end of the transition period.</p> <p>b. Ensure the impact on protected species and habitats is minimised, through suitable mitigation and compensation measures.</p> <p>3. Within section 6 Assessment and Evaluation it says “6.14 No ecological surveys have been undertaken.” For all of the sites we have some ecology survey information either from pre-app or actual planning applications. Some of the sites have badger and/or Great Crested Newt issues to resolve.</p> <p>4. The site at Furtho Pit also has a non-designated statutory site in the middle of it – Dogsmouth Brook Meadow which does not appear to be identified.</p> <p>5. Green Infrastructure is mentioned a number of times which is welcomed, the green infrastructure should be aiming for a biodiversity net gain, this goes a step further than green infrastructure, and should certainly be the case particularly for AL5 within the country park area.</p>		
SPD303	MJ Gale	<p>I fully support the document submitted by Councillor Charles Manners in regards to changes and objections to the SPD proposals.</p> <p>In short, nothing that falls outside of the current local plan for the area which specifies only small and medium buildings (and no large) should be allowed to proceed.</p> <p>The local plan is there for a very good reason and should not be ignored.</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be</p>	<p>The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			<p>consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>	<p>need to be undertaken to best shape a proposal for each site.</p> <p>The wording relating to frontages onto the A5 and Towcester Road has been strengthened.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design across the site as well as including</p>



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			<p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The SPD can be revised in future to include AL3 as necessary. Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner. Planning applications and the suitability of the redline boundary will be determined against the development plan and material considerations</p>	<p>more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards. Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
				planning consent, that details will be subject to a further impact assessment in line with the general principles set out in the SPD.
SPD303	National Grid (Avison Young)	We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.	Comments noted.	No changes necessary.
SPD304		<p>As resident property-owners in South Northamptonshire, we are writing in support of Councillors Charles Manners and Alison Eastwood's letter of 14 August responding to the SLP consultation with strong arguments to tighten limits on size and scale of development. and to tighten definitions of appropriate development.</p> <p>It is essential to protect the interests of existing communities in this part of the county, many of which are still rural with agricultural interests, from short-term commercial exploitation which tends to be driven by politically motivated pressures and abstractedly conceived policies. We urge you therefore to</p>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites.</p> <p>The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p>	The SPD will be amended to confirm that the heights are indicative and that further assessment and design

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>consider our Councillor's comments seriously and to integrate their points into future local planning policy.</p>	<p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p> <p>National Highways are undertaking their own consultation currently on the A5 improvements for Towcester. The main objectives for this include improve safety, reduces the impact of air and noise pollution, boost the local economy, improve accessibility to Towcester town centre and preserve its rich history and identity.</p> <p>Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to</p>	<p>work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The wording relating to frontages onto the A5 and Towcester Road has been strengthened.</p> <p>A design principle has been added that directly addresses the need for high quality building and landscape design</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
			<p>be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations, meet demand for small and medium enterprise and reduce the level of out commuting. Future proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by benefits. The SPD can be revised in future to include AL3 as necessary. Barton Willmore, now Stantec confirmed no conflict of interest in relation to the Council's requirements as part of their submission to the Council's Request for Quotation for this project. The SPD has been prepared in a fair and transparent manner. Planning applications and the suitability of the redline boundary will be determined against the development plan and material considerations</p>	<p>across the site as well as including more appropriate imagery throughout the document that will seek to encourage/steer applicants towards more ambitious design standards.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
SPD305	Bailey	<p>I understand there is a planning application for a development at this site. I am not sure just what is planned, but I am very concerned about the height of any structures here. This site is on the axis of a sight line which was created around 1700 with the building of Easton Neston House, with initially an avenue of trees in the park which then extended to a vista point with Greens Norton church, whose spire was rebuilt with urns at the base creating in effect an obelisk centrepiece to the view. While the urns are no longer there the spire still acts in the same capacity, most notably from the first floor Gallery in the house. There is a similar axis view to the SE from the other side of the house.</p> <p>It would be most unfortunate if these view lines were disrupted by incongruous development.</p> <p>This may seem a trifling thing in planning terms, but so much of history has been swept aside in recent years, I would hope that some consideration might be given to my argument.</p>	Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping.	The SPD has been amended to reflect that the visual link between the spire of Greens Norton Church and Easton Neston House. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
				application stage will need to be undertaken to best shape a proposal for each site.
SPD306	Slapton Residents	<p>This letter is being sent to WNC on behalf of residents of Slapton as a response to the draft Employment Site Allocations Development Brief Supplementary Planning Document (SPD) dated July 2022, which invited responses in paragraph 1.13 of the document by today.</p> <p>The SPD notes that new planning policies cannot be introduced via a SPD and that it can only provide guidance as to the application of existing planning policies to the future development of four of the five employment allocation sites already identified as AL1, AL2, AL4 and AL5 in the Part 2 Local Plan adopted in July 2020. The report also notes in paragraph 1.10 that the SPD has been prepared without any pre-determination of the planning applications which are pending in respect of these four sites.</p> <p><b>Proposed height and size of buildings in identified development sites</b></p> <p>The role of the five employment sites, AL1 – AL5 is set out in paragraph 13.1.5 of the Part 2 Local Plan in 5 bullet points, the most important being:</p> <ol style="list-style-type: none"> <li>1) To meet local demand and strengthen the rural economy;</li> </ol>	<p>The scope of the SPD is to establish general guidance and design principles for the allocated employment sites. Building heights have been informed by a combination of desk-based assessments and site visits, taking into account a wide range of key considerations and site contextual information including existing tree heights and landscaping. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p> <p>The employment allocations were identified to meet local demand and strengthen the rural economy, provide the ability to strengthen local supply chains, provide for local flexibility and a choice of locations,</p>	Additional wording has been added regarding AL3 to set out that alongside revised planning applications being considered against the parameters already agreed via the planning consent, that details will be subject to a further impact

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>2) To meet the demand for small and medium sized businesses;</p> <p>3) To contribute to reducing the level of out commuting.</p> <p>As recorded in paragraph 1.7 of the SPD report, the sites were also identified to 'facilitate some additional small scale employment opportunities for the growing population associated with the strategic development site in the south of the town.'</p> <p>Paragraph 13.2.2 of the Part 2 Local Plan explained that '(sites AL1, AL2 and AL3) offer suitable locations for a range of new small and medium sized business units' and paragraph 13.2.3 further explained that the AL1 site 'represents and appropriate location for the provision of additional small and medium sized commercial buildings.'</p> <p>It is noted that nowhere in the Part 2 Local Plan does the plan raise the possibility that any of these sites would be a suitable location for a large business unit, however defined.</p> <p>It appears that Part 2 Local Plan does the plan raise the possibility that any of these sites would be a suitable location for a large business unit, however defined.</p> <p>It appears that the Part 2 Local Plan did not define what was meant by 'small and medium sized commercial buildings,' but in its first bullet point summarising the overarching design principles that the authors of the SPD report themselves recommend to guide decision making in relation to planning applications for the sites in question, the SPD report states that any new development for sites AL1, AL2, AL4 and AL5 should</p>	<p>meet demand for small and medium enterprise and reduce the level of out commuting. However, there may be the opportunity for development proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area. Large proposals would need to ensure that the development was in accordance with the development plan and any other material planning considerations. Any harm would need to be outweighed by the benefits. The Local Plan Part 2 requires a transport assessment and travel plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures.</p> <p>The Highways Authority (and where relevant National Highways) will be consulted at a planning application stage. In line with national policy development can only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the roads would be severe.</p>	<p>assessment in line with the general principles set out in the SPD. The SPD will be amended to confirm that the heights are indicative and that further assessment and design work at the application stage will need to be undertaken to best shape a proposal for each site.</p>

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>support 'Local Plan policy to deliver high quality development <u>that is respectful of its surroundings.</u>' Emphasis added.</p> <p>Applying that principle, Slapton residents support the proposals made by Save Towcester Now, Cllr Charles Manners and others in their written submissions to WNC on this issues, namely:</p> <ol style="list-style-type: none"> <li>1) That no new building should be permitted on any of these sites which is taller than any existing building on a nearby site, which means that the ridge height of any new permitted development should be no more than 10 metres above ground level;</li> <li>2) That no new building on any of these sites should have a footprint that is greater than 5,000 sq metres.</li> </ol> <p>This SPD report has introduced for the first time under the heading of Contextual Considerations the possibility of granting planning permission for the AL1 – AL5 sites not only small and medium sized buildings but also for large buildings. The report then proceeds to offer a definition for these three categories of building. The SPD report defined medium sized buildings as having a footprint of between 2,500 sq. metres and 8,000 sq, metres with no maximum figure. However, there is no large building within this definition anywhere in the Towcester area: the only building of this size cited in the report are in the large scan Swan Valley industry / distribution estate alongside the M1 near Northampton, which it is not accepted is in any respect a suitable comparator to the small and medium sized developments envisaged for these sites by the Part 2 Local Plan. Moreover, the maximum footprint of any present building of the Tove Valley Business Park and the Silverstone Park development, which are the only appropriate comparators for the AL1 – AL5 sites, is 5,000 sq. metres, so this is a more</p>		



Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>suitable figure to adopt as the maximum footprint for a medium sized building.</p> <p>Having introduced the new category of large buildings and expanded the definition of medium sized buildings, the SPD report recommends, under the heading of Building Height, Scale and Massing, that medium sized buildings should be acceptable up to a height of 16 metres and that there should be a presumption that large buildings should be granted planning permission 'in exceptional circumstances', which are wholly undefined, except that they should be of high design quality and should be accompanied by a thorough programme of landscape measures. The report contains no reasoned justification for these proposed amendments to the existing guidelines set out in the Part 2 Local Plan. Therefore, Slapton residents strongly urge WNC to reject the unjustified introduction of what amount to a new, or at the very least a radically altered, planning policy via the SPD.</p> <p>The stated purpose of the SPD report (at paragraph 8.3) is to reduce uncertainty and set out clear guidance as to what is expected from development proposals, but it is submitted that, by introducing the express possibility of planning permission being granted for large buildings on these sites without any limit on their maximum size and by expanding the definition of a medium sized building, the report is increasing uncertainty and encouraging unsuitable applications, like the pending application of DHL for the AL1 site, which involved a building which is more than 18 metres high and has a footprint in excess of 110,000 sq. metres. WNC would still have a residual discretion to allow a planning application that fell outside its stated guidelines, if the SPD report was amended to delete all references to large buildings and to redefine medium sized</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>buildings for the purposes of these guidelines as having a footprint of no more than 5,000 sq. metres and Slapton residents strongly recommend that these amendments should be made to the draft report before it is finalised.</p> <p><b>Traffic implications of possible development of identified sites</b></p> <p>The SPD does not address the traffic implications of any of the four developments which are the subject of the report. In fact, the only mention of traffic implications is in is in paragraph 1.21 of the report, which concedes that it is important to take into account the cumulative impact of other approved developments when considering any planning application for AL1, AL2, AL4 or AL5 and suggests that, at the decision-making stage, the developer may be required to carry out a traffic impact assessment.</p> <p>Slapton residents believe that this guidance is wholly inadequate, given the fact that local roads and in particular both the A5 and A43 regularly very heavily congested as a result of present traffic volumes, without the added impact of any further development in the Towcester area. The pending DHL planning application for sites AL1 includes a transport assessment which predicts that the development will generate 465 arrivals and departures of commercial vehicles in the 4pm-6pm rush hour. This could well be an underestimate and also does not predict traffic movements either between 9am and 4pm or outside normal working hours. If traffic movements in the 4 hours of rush hour are estimated by the applicants to be likely to generate 820 movements of commercial vehicles, traffic movements over a 24 hour period could amount to more than 2,000 or even 3,000 if they continue outside of normal working</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>hours. This would have a major adverse effect on traffic movements throughout the Towcester area which will be to the serious detriment of all local residents.</p> <p>Residents of South Northants already have to cope with a very heavily overburdened road network, with the A43 bypass being regularly reduced to a stationary or very slow moving traffic jam and the A5 Watling Street also being heavily congested especially when the M1 is closed or traffic is diverted from the motorway. In these circumstances, Slapton residents feel very strongly that the traffic implications of any new proposed development in or near Towcester should be a very important factor in deciding whether or not to grant planning permission and that any development that is likely to generate additional traffic movements comparable to those of DHL pending application should be refused planning consent on that ground alone, on the basis that the existing road network does not have the capacity to handle the additional traffic that would result from such development.</p> <p>It is possible that it will be argued that developments involving smaller enterprises will generate as much additional traffic as a single large warehouse development, but there is no evidence that this would be the case in Towcester and in any event traffic movements have been greatly altered by the experience of the pandemic, which has led to far fewer face-to-face meetings and much greater use of remote communications and present indications are that this will continue to be the pattern for foreseeable future.</p> <p>Given the importance of the extent of additional road traffic generated by any proposed new development, the SPD should require any application to include details of the estimated traffic</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p>movements likely to be created by the new development and should give details of WNC's suggested maximum figures for new traffic generation and as well as conditions likely to be imposed on use of the site, for example a ban or restriction on 24 hour working.</p> <p>It was apparently suggested at a public meeting called to discuss the SPD report that traffic concerns are not relevant in assessing sites allocated for development or specific planning applications. It is thought that this must be a reference to paragraph 111 of the National Planning Policy Framework ('NPPF') which states that development should only be refused on highway grounds if the impact on the road network would be severe, but the impact on the road network would in this case be extremely severe, if planning guidance allowed a large building, especially a national distribution centre, to be built on the AL1 site.</p> <p><b>Effect of SPD report guidelines in preventing other more suitable development</b></p> <p>One of the stated aims of the Part 2 Local Plan is to offer suitable locations for a range of new small and medium sized business units, but this aim is likely to be frustrated if a single large company is allowed to develop the whole of site AL1 (or any of the other sites). Such a development would also undermine the aim of meeting the local demand for employment of a highly skilled nature, because warehouse employment would be predominately low skill. In addition, the Swan Valley distribution estate is a far more suitable place for the siting of large scale developments of national importance, both because of its position and because of other facilities available at Swan Valley.</p>		

Response No	Respondent's Name	Comments	Suggested Response	Suggested Action
		<p><b>Other factors</b></p> <p>It is noted by Slapton residents that Save Towcester Now has a following of 980 residents and that 3,950 people have signed its petition opposing large scale development on all these sites. So far as is known, there is no significant support among local residents for the type of large scale development proposed by the DHL application which it is submitted would be encouraged by the SPD report in its currently amended form.</p> <p>Slapton residents also support the comments and proposals for amendments of the SPD report contained in the Save Towcester Now email of 8<sup>th</sup> August 2022, the letter dated 14<sup>th</sup> August 2022 by Cllr Charles Manners, the email dated 17<sup>th</sup> August 2022 by James Miller and the letter dated 18<sup>th</sup> August by Andrea Leadsom M.P.</p> <p>Slapton residents urge the WNC to adopt the proposals summarised in paragraph 6 above as supported by Save Towcester Now and others in relation to the employment allocation sites, AL1 to AL5, namely to limit planning consent on these sites to new buildings that are not more than 10 metres in height and have a footprint of not more than 5,000 sq. metres. The WNC is also encouraged to invite the authors of the SPD report to amend it so that it omits all references to large buildings and redefines medium sized buildings as those which have a footprint of not more than 5,000 sq. metres.</p>		

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**Employment  
Site Allocations  
Development Brief**

Supplementary Planning Document (SPD)

October 2022



West  
Northamptonshire  
Council

**BARTON  
WILLMORE** Page 1049



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# Introduction

**1**

# 1. Introduction

## Background

1.1 It is the role of the development plan to ensure that there are sufficient employment sites identified which will support the ambitions for sustainable economic growth within the area. The Joint West Northamptonshire Core Strategy (Joint Core Strategy / Local Plan Part 1) covers the extent of the former Daventry District, Northampton Borough and the South Northamptonshire Council area and identifies the broad spatial distribution for employment land together with identifying strategic sites.

1.2 The South Northamptonshire Local Plan Part 2: Settlements and Countryside (Part 2 Local Plan), which was adopted in July 2020, supplements the strategic plan and ensures that local needs and aspirations can also be met. The Part 2 Local Plan fits within the strategic context of the policies in the Joint Core Strategy. Whilst the Joint Core Strategy is in the process of being reviewed, the review is at early stages and is not sufficiently advanced to take account of.

1.3 As part of the preparation of the Part 2 Local Plan, five employment sites were identified to enable employment generating development to meet localised employment needs which are not met by the Joint Core Strategy. The employment sites were identified to enable existing companies sufficient opportunity to expand and also to provide opportunities for new companies to form.

1.4 The role of the five new employment sites is set out in paragraph 13.1.5 of the Part 2 Local Plan:

- Meet local demand and strengthen the rural economy;
- Provide the ability to strengthen local supply chains;
- Local flexibility and choice of locations;

- Meet the demand for small and medium sized units; and
- Contribute to reducing the level of out commuting.

1.5 The purpose of these very clear roles is to ensure they meet local demand and are complementary to the 65 business parks already existing across the South Northamptonshire area as well as the strategic employment sites at the Motorway junctions and at Silverstone.

1.6 The five sites subsequently allocated for employment in the Part 2 Local Plan are:

- Policy AL1: Land at Bell Plantation, Towcester
- Policy AL2: Land at Woolgrowers Field, Towcester
- Policy AL3: Land at Tiffield Lane, Towcester
- Policy AL4: Land at Shacks Barn, Whittlebury
- Policy AL5: Land at Former Furtho Pit, Old Stratford / Cosgrove.

1.7 Sites AL1 - AL3 are located to the north of Towcester and are well connected with good accessibility to the M1 to the east, M40 to the east and is at the crossroads of the A5 & A43. The sites were identified to facilitate some additional small scale employment opportunities to provide additional choice and opportunity for the growing population associated with the strategic development site to the south of the town. They were also identified to address people commuting from Towcester elsewhere for employment purposes.

1.8 Site AL4 is known as the Shacks Barn Farm site and is located on the boundary of the Parishes of Silverstone and Whittlebury. There are already businesses operating from the wider site. However the allocation seeks to extend

the existing business park to allow for a range of small and medium sized business units.

1.9 Site AL5 is Furtho Pit which is located east of the A5 / A508 junction at Old Stratford / Cosgrove. A small part of the site has previously benefited from planning permission and the remaining area has a mixture of farmland and a derelict former gravel pit. The site provides an opportunity for high visibility on a site of poor environmental quality. Regard must be had to the existing residential properties surrounding the site as well as the heritage assets in the area. There is also an opportunity to create a country park and the canal route must also be protected.

1.10 At its meeting of 27 January 2022 the Council's Strategic Planning Committee considered an application for the development of Local Plan Allocation AL3 (Tiffield Lane, Towcester). The committee resolved to approve that application and grant planning permission for the development. With matters already agreed in respect of AL3 and the Notice of Decision issued the SPD does not consider or make recommendations in respect of that Local Plan Allocation. Any revised applications for AL3 will have to comply with the parameters set out in that consent, and the details will be subject to further impact assessment carried out in line with the general principles set out in the SPD. The details of planning applications relating to the remaining four employment sites are set out under each of the site descriptions (refer to pages 10-13). The planning applications will be considered in accordance with the development plan and any other material considerations. These active discussions have been recognised but this SPD has been prepared without any pre-determination of these planning applications.





## Purpose

1.11 Barton Willmore has been commissioned by West Northamptonshire Council to produce a Supplementary Planning Document (SPD) to guide and support the future development of four of the five employment allocations AL1, AL2, AL4 and AL5.

1.12 The purpose of this SPD is:

- To improve the planning and development process by reducing uncertainty and providing landowners, developers and the wider community with clear guidance on what is expected from future developments;
- To provide a robust and clear development framework with clear, specific development principles to inform the preparation and determination of planning applications. This will ensure a comprehensive approach to the appropriate uses on the allocated sites in accordance with the development plan ;
- To provide guidance ensuring that the evidenced land uses are appropriate to the wider context; and
- To raise design standards and the overall quality of development to create sustainable, exemplary places which are functional and respond to their surroundings.

## Community Involvement

1.13 In line with the Council's Statement of Community Involvement, we have sought to encourage everyone to get involved in the preparation of this SPD.

1.14 A community engagement process was undertaken that allowed views on a draft of this document to be

submitted either online, through the Council's consultation website & by post or via a response form that was available for download from our website.

1.15 The draft SPD was available for consultation for six weeks up until the midnight of the 18th August 2022 with three in-person events held in Towcester and Old Stratford. In total 306 comments were submitted.

## Assessing Impacts

### Sustainability Appraisal

1.16 A Sustainability Appraisal was undertaken for both the Joint Core Strategy and the Part 2 Local Plan. Owing to the scope of this SPD, there is no identified need to undertake a further Sustainability Appraisal.

### Habitats Regulations Assessment

1.17 Habitats Regulations Assessment (HRA) is integral to the development of land use documents as it provides a statutory process to assess the potential impact on Natura 2000 sites. This was undertaken as part of the preparation of the Part 2 Local Plan. Owing to the scope of this SPD, there is no identified need to undertake an Appropriate Assessment.

### Equality Impact Assessment

1.18 An Equality Impact Assessment allows us to assess any risk of discrimination. An EQIA was undertaken as part of the preparation of the Part 2 Local Plan and no issues were identified.

### Health Impact Assessment

1.19 The development plan plays a key role in shaping the physical environment which can have a significant impact on health and well-being. The Part 2 Local Plan sets out the requirement for Health Impact Assessments. All major developments (10 or more dwellings or 1,000 or more square metres) will

be expected to complete and submit a rapid HIA in order to determine if a more substantial HIA is necessary.

## Transport Assessments and Statements

1.20 It is important to give appropriate consideration to the cumulative impacts arising from other committed development (i.e. development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years). At the decision-taking stage this may require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of transport network as well as other relevant local sites benefitting from as yet unimplemented planning approval.

## Site Locations and Descriptions

### Site Locations

1.21 Of the four employment sites, two (AL1 & AL2) are located to the north of Towcester along the A43, two of which front onto the Tove Roundabout which links the A43 with the A5. As the main link onto the A43, there is a mixture of commercial, office and light industry land uses near by.

1.22 AL4 is located in an important position adjoining the A43, southwest of Towcester, close to the Whittlebury junction and Silverstone. AL5 is located at a prominent position adjoining the A5 and A508, adjacent to the settlement of Old Stratford and Cosgrove.

Figure 1 Sites AL1, AL2 and AL3



Figure 2 Site AL4



Figure 3 Site AL5





### Policy AL1: Bell Plantation

Located to the north of Towcester on land associated with and including the Bell Plantation. The site provides circa 35 hectares (ha) for mixed employment generating development to reflect the need for diversity and resilience in the local economy as expressed in the Economic Growth Strategy. A further 6 ha is identified for the creation of a home ground for Towcester Town Football Club. Employment uses are to be accessed from the A5 with provision of an unfettered road access to the edge of the football club site also provided. The site must be served by good access by public transport including for pedestrians, cyclists and to enable bus penetration. Detailed design must have regard to any non-designated and designated heritage assets, in particular the Easton Neston Grade II\* Registered Park and Garden. A high-quality landscape setting is required by the allocation.

### Current Planning Status

AL1 is currently subject to two live planning applications (WNS/2021/1819/EIA and WNS/2021/2168/MAO). The first planning application is hybrid with full detail for a roundabout access from the A5, the delivery of access for the Towcester Town Football Club a single warehouse and ancillary offices. The outline element is for the development of the Towcester Town Football Club and employment floor spaces for general industrial and storage and distribution uses with ancillary office spaces. The second planning application is outline for B2 and B8 buildings and principal access to the A5. The full description of development can be found on the Council's planning portal.





**Policy AL2: Land at Woolgrowers Field, Towcester**

Located to the north of Towcester, bound by the A5 to the east and Towcester Road & the A43 to the south. The site provides circa 4.5 hectares (ha) for mixed employment generating development to reflect the need for diversity and resilience in the local economy as expressed in the Economic Growth Strategy. Employment uses are to be accessed from the A5 and / or Towcester Road. The site must be served by good access by public transport including for pedestrians, cyclists and to enable bus penetration. Detailed design must have regard to any non-designated and designated heritage assets and in particular the Easton Neston Grade II\* Registered Park and Garden. A high-quality landscape setting is required by the allocation.

**Current Planning Status**

AL2 is currently subject to an outline planning application (S/2020/2045/MAO) for industrial and commercial development including the potential for a car showroom, builders merchants and an emergency services hub. The full description of development can be found on the Council's planning portal.



**Policy AL4: Land at Shacks Barn, Whittlebury**

Located at an important position adjoining the A43, southwest of Towcester, close to the Whittlebury junction. The site provides 10 hectares (ha) for mixed employment generating development to reflect the need for diversity and resilience in the local economy as expressed in the Economic Growth Strategy. Employment uses are to use the existing access only off the A413. The site must be served by good access by public transport including for pedestrians, cyclists and to enable bus penetration. Detailed design must have regard to any non-designated and designated heritage assessments and in particular the Easton Neston Grade II\* Registered Park and Garden. A high-quality landscape setting is required by the allocation.

**Current Planning Status**

AL4 is currently subject to an outline planning application for mixed use employment use including research and development and industrial processes, general industrial and storage and distribution. The full description of development can be found on the Council's planning portal.





**Policy AL5: Land at Former Furtho Pit, Old Stratford / Cosgrove**

Located at an important position adjoining the A5 and the A508. The site provides 16 hectares (ha) for mixed employment generating development to reflect the need for diversity and resilience in the local economy as expressed in the Economic Growth Strategy. Employment uses are to access from a new roundabout junction from the A508. The site must be served by good access by public transport including for pedestrians, cyclists and to enable bus penetration. Detailed design must have regard to any non-designated and designated heritage assets, in particular the Scheduled Monument 1013660 'Motte and Bailey Castle' Deserted Village and Monastic Grange at Old Wolverton. Detailed consideration must also be had to the existing canal route including future needs and to the layout of the country park. A high-quality landscape setting is required by the allocation.

**Current Planning Status**

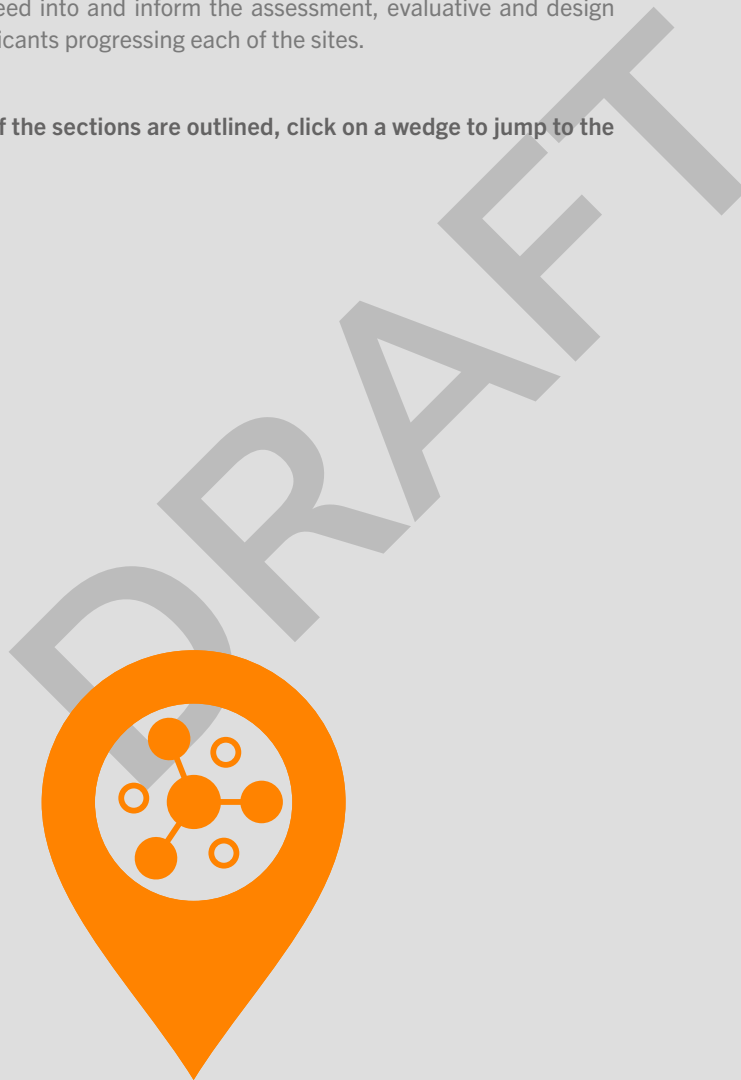
Whilst there has been no formal planning application for the site, the site has experienced some planning interest. A screening request for an Environmental Impact Assessment (EIA) was submitted (WNS/2021/1628/SCR) and following that an EIA Scoping (WNS/2021/1985/SCO). The Scoping Opinion was for 9 employment units for general industrial and storage and distribution with ancillary research and development, together with a country park and vehicular access from the A508. This indicates that a planning application is being prepared for the site. The full description of development can be found on the Council's planning portal.



## How to use this document

1.26 This document is split into six key sections that together provide direction for those involved in the development of the four employment sites. Each section outlines contextual & site specific issues that should be considered in the development of each site. They should feed into and inform the assessment, evaluative and design work undertaken by applicants progressing each of the sites.

On the next page each of the sections are outlined, click on a wedge to jump to the corresponding section.





## 2. Planning Policy Context

Outlining the local policy context in relation to the four sites, from general policy relating to employment land to site-specific design briefs for each site. **A full version of the latter is included in the appendix.**

## 3. Contextual Considerations

Identifying some of the contextual considerations that need to be taken into account for each of the employment sites. It also establishes a definition for small, medium and large building/unit sizes, referenced throughout sections 5 and 6.

## 4. Landscape and Visual Consideration

Setting out a brief landscape and visual summary for each of the four employment sites. It includes a series of potential sensitive receptors that have informed the identification of 'Sensitive Areas' for each site in section 6.

## 5. Design Principles

Outlining a series of non-spatial and overarching design principles that clearly express the need for a design-led approach to each of the four employment sites without dictating the form that development takes.

## 7. Exemplar Development

This section outlines the four key facets of a development where an exemplary approach should be taken, particularly if the market dictates the need for flexibility away from the SPD.

## 6. Assessment & Evaluation

A series of development frameworks that illustrate spatial parameters for each of the sites. These attempt to avoid a prescriptive, one-size-fits-all approach and are based on individual site assessments (included in this section), the Contextual Considerations and Landscape & Visual Assessment.





# Planning Policy Context

# 2

## 2. Planning Policy Context

### Policy Context

2.1 Planning applications for the sites will continue to be determined against the relevant policies of the development plan together with any other material considerations. This SPD will be a material consideration in decision making and provide more detailed advice and guidance in line with the adopted policies in the development plan .

2.2 New planning policies can not be introduced via a SPD. Therefore, this section explains the existing policy context within which this SPD sits. Further information on the requirements for producing a SPD can be found in Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2.3 There are no known Neighbourhood Plans which directly impact on the employment allocations AL1 to AL5. Therefore, the development plan for the sites is:

- Adopted West Northamptonshire Joint Core Strategy (2014)<sup>1</sup>; and
- Adopted South Northamptonshire Local Plan Part 2: Settlements and Countryside (Part 2 Local Plan) (2020).

2.4 The Joint Core Strategy sets the strategic vision for economic development across the wider West Northamptonshire area. It is set out that a vibrant economy will strengthen communities, support sustainable development objectives and help reverse areas of decline.

<sup>1</sup> [Joint Core Strategy Adoption | West Northamptonshire Council \(westnorthants.gov.uk\)](https://www.westnorthants.gov.uk)

2.5 The overarching employment strategy was, in part, set out in the Joint Core Strategy. **Policy S1** sets out the overarching distribution and also recognises that the development needs of the Rural Service Centres, including Towcester need to be provided for.

### South Northamptonshire's Economic Growth Strategy

"The aim is to ensure a variety of job opportunities for local people and that people have access to local based educational facilities that can improve their employment prospects."

Joint Core Strategy

2.6 South Northamptonshire's Economic Growth Strategy has a date of 2016 – 2019. This sets the backdrop of the four employment allocations. The Strategy has 4 key interdependent priorities which guide development growth and supports the employment growth across the across South Northamptonshire. The themes are:

- **Theme One:** Improved Skills and Employment;
- **Theme Two:** Effective Business Support;
- **Theme Three:** Strengthening the Town and Village Economy; and
- **Theme Four:** Supporting the Visitor Economy.

2.7 The Economic Growth Strategy is to be updated in line with the new unitary authority's priorities and ambitions.

### South Northamptonshire's Local Economic Assessment

2.8 In determining the appropriate policy direction for the Part 2 Local Plan, the evidence base informing the policies included the South Northamptonshire's Local Economic Assessment (May 2017). This Local Economic Assessment recommended that the policy direction for the Part 2 Local Plan was to increase the number of jobs so that its resident population could remain within the local area for work and help to increase spending within the associated settlements and thus contributing to their improved vitality and viability. The examining Inspector at the Part 2 Local Plan's Examination in Public agreed that the role of the four new employment sites is as set out in paragraph 13.1.5 to:

- Meet local demand and strengthen the rural economy;
- Provide the ability to strengthen local supply chains;
- Local flexibility and choice of locations;
- Meet the demand for small and medium sized units; and
- Contribute to reducing the level of out commuting.

2.9 Whilst this SPD will set out the contextual, landscape and visual analysis to inform the appropriate design parameters and guidelines for the individual sites, the overarching role of these four sites must also be taken into account.



## West Northamptonshire Joint Core Strategy (2014) (Local Plan Part 1)

2.10 The adopted **Joint Core Strategy** covers the former administrative areas of Daventry District; Northampton Borough and South Northamptonshire. The area is now covered by West Northamptonshire Council. The Joint Core Strategy sets out the long-term vision and objectives for the plan period up to 2029 and includes strategic policies to steer and shape development.

2.11 Owing to the area's strategic connections particularly by road and rail, there is a recognition that the area is attractive to the warehouse and storage industry. Whilst acknowledging it as an important economic sector, the Joint Core Strategy is concerned about an over reliance on one employment sector and therefore seeks to provide diverse employment opportunities to its residents.

2.12 In addition, there is a recognition that the rural economy must be supported and rural diversification is to be encouraged. This is to be supported by dynamic town and village centres. **Policy S1** sets out the general spatial distribution for development across the area.

2.13 In assessing the suitability of sites for development, priority will be given to making best use of previously developed land and vacant and under-used buildings in urban or other sustainable locations. This will contribute to the achievement of a

West Northamptonshire target of 30% of additional dwellings on previously developed land or through conversions.

**2.14 Policy S8** sets the strategic direction for the distribution of jobs. Section 1 of the policy is relevant to Northampton and Section 2 of the policy is relevant to Daventry. Section 3 of policy S8 is of relevance to this SPD in setting the overall strategic context. The full policy, together with policies E7 and R2, can be viewed in the Joint Core Strategy as necessary.

2.15 The Joint Core Strategy also sets out narrative about jobs growth by sector. Whilst the job sectors are not policy, it does help to provide useful context around the economic aspirations of the Council which have helped to inform its policy direction.

- **Offices** – Settlements will need to maintain, renew and replace their stock of office development.
- **Manufacturing** – Some elements of manufacturing related to the high-performance technologies sector are growing but often means fewer employees due to successful mechanisation. Land requirements remain and may even require expansion.
- **Warehousing** – The area remains attractive to the warehouse industry and indications are that it is likely to remain so for the lifetime of the plan. However, delivering new space to cater for the warehousing sector on a trend-based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy.

- **Research and Development** – West Northamptonshire is driving up its educational standards across all of its towns and seeking new partnerships between higher educational providers and established business sectors for example at Silverstone circuit.

- **Non B Class** – non B class jobs include those in health care, retail, leisure, tourism, sport, education and cultural development. The non B class sector has grown in West Northamptonshire and the focus on town centres to provide more retail and service development to cater for the growing population will see this sector grow further. Tourism and leisure industries are important to both the rural and urban economies.

- **Green Economy** – supporting innovation and working with industry in the use and development of alternative energy sources and through design and build to ensure effective and efficient sustainable workplaces are also important initiatives.

2.16 As well as the economic aspirations, the importance of sustainable development is enshrined within the Joint Core Strategy. Alongside a presumption in favour of sustainable development, **Policy S10** sets out the sustainable development principles which apply to all development including that on allocated sites.

2.17 The Joint Core Strategy also sets out a strong desire to achieve modal shift (encouraging people to use public transport rather than their private motor vehicle) and to ensure that development sites are accessible by public transport

including walking and cycling opportunities. The overall approach is set out in Policy C1: Changing Behaviour and Achieving Modal Shift.

2.18 Overarching **Policy T1** recognises the role of Towcester as a rural service centre. The policy sets the overarching ambition for the town and there are secondary policies for each of the criteria which can be viewed in the Joint Core Strategy (see policies T2 to T5).

## West Northamptonshire Strategic Plan

2.19 A review of the Joint Core Strategy is currently under way. The Strategic Plan will guide development in the period up to 2050. The West Northamptonshire Strategic Plan Spatial Options was consulted upon until 24 December 2021.

2.20 Whilst the Spatial Options consultation was the second consultation stage, no decisions have yet been made on the likely policy direction. The Local Development Scheme indicates that the Strategic Plan will be adopted by March 2024, there it is unlikely that no any weight as part of decision making will be afforded to this document.

## Part 2 Local Plan

2.21 In line with the Joint Core Strategy, the **Part 2 Local Plan** allocates additional employment land to facilitate more local employment growth. The aim is to attract new investment and provide more jobs to match the skills of local people. Thus balancing the ratio of in and out commuting.

2.22 The allocated sites in the Part 2 Local Plan (paragraph 13.1.5) are intended to:

- Meet local demand and strengthen the rural economy;
- Provide the ability to strengthen local supply chains;
- Local flexibility and choice of locations;
- Meet the demand for small and medium sized units; and
- Contribute to reducing the level of out commuting.

2.23 The four employment sites are allocated by policies AL1, AL2, AL4 and AL5. All four of the allocations are to be accompanied and supported by an independent study providing market-led evidence on the proportion of B1 (offices), B2 (general industrial) and B8 (storage and distribution) uses to be delivered. The policy also allows some supporting uses that are demonstrably subservient and complementary in both scale and nature to the main B use class. The studies are to be undertaken by an independent expert and the scope of which should be agreed in advance with the Council.

2.24 The full design briefs for the four employment sites can be found in **appendix A**, as well as the Part 2 Local Plan.

## Policy SS2: General Development and Design Principles

2.25 Alongside the requirements of Policies AL1, AL2, AL4 and AL5, general development and design principles are set out in Policy SS2 which covers requirements such as setting, materials and design, accessibility and water. Development proposals will be expected to meet the requirements of SS2. Owing to the purpose of this SPD, the overarching policy SS2 is of particularly relevance.

2.26 The policy approach set out within the development plan sets the context within which this SPD has been produced. The four sites at Towcester, Whittlebury and Old Stratford & Cosgrove have been allocated for employment uses which will strengthen the rural economy & local supply chains, provide local flexibility, meet the demand for small & medium sized units and contribute to reducing the level of out commuting.

2.27 This SPD has taken the policy requirements of the Joint Core Strategy and the Part 2 Local Plan into consideration including the general design policies. This together with understanding the site context, opportunities and constraints has resulted in the design principles for each of the sites.

2.28 The full policy SS2 can be found in **appendix B**, as well as the Part 2 Local Plan.

## Socio-Economic Context

2.29 The 2011 Census reveals that the majority of residents (72%) live in the rural areas, 5% live within the urban fringe of Northampton with the remainder (23%) in the market towns.

2.30 The Halifax Quality of Life Survey (2017) ranked South Northamptonshire the 13th most desirable place to live in the country. It is prosperous with a highly skilled workforce, good education rates and low deprivation.

2.31 The 2011 Census shows the population of South Northamptonshire is just over 85,000; up 21,000 in 30 years and 7.5% in the last ten years. Since 1981 the proportion of the district's

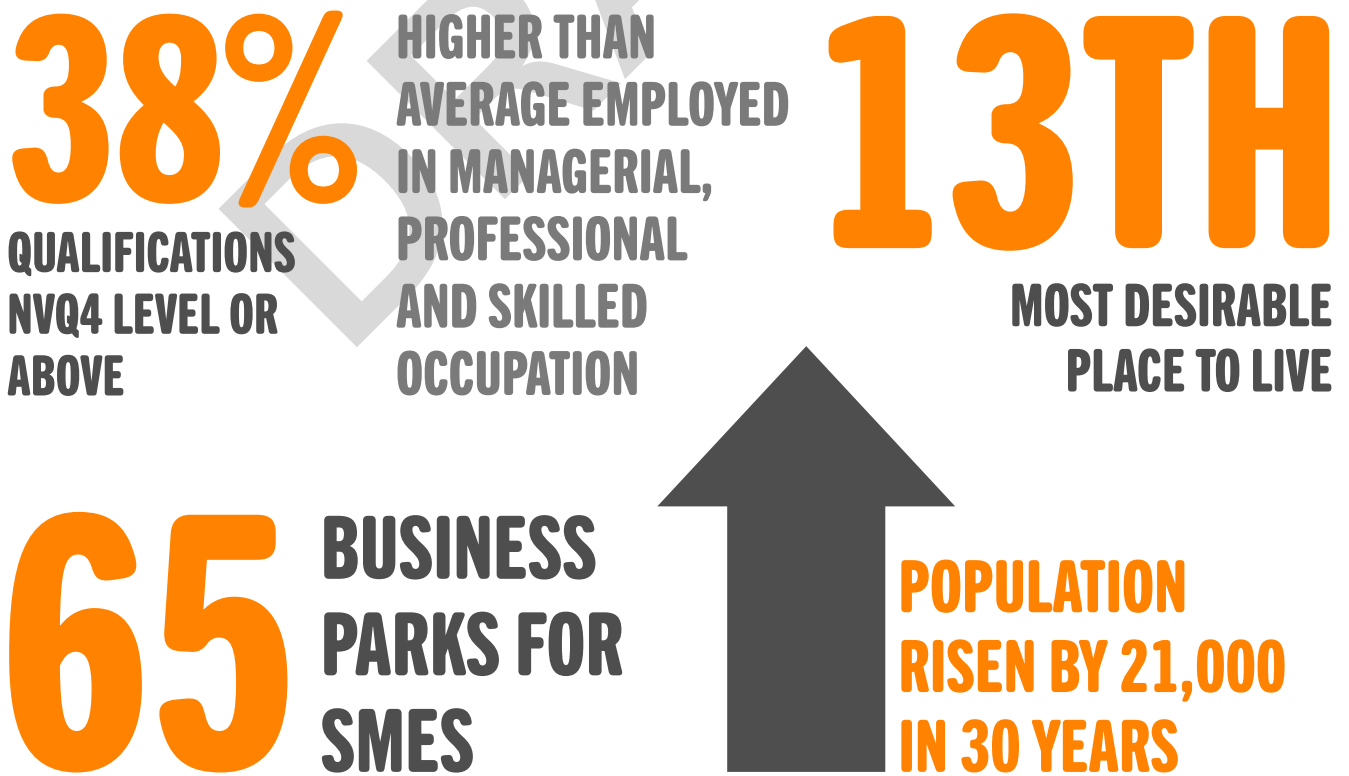
population aged over 60 has increased by 90% with an increase of 40% since 2001 (an increase of South Northamptonshire Local Plan (Part 2) 16 6,025 people). Since 1981 the population aged 0 – 19 has only increased by 2%

2.32 South Northamptonshire is a largely prosperous district that has not fully realised its development opportunities in the past. However, the district's economy has grown in recent years with significant planned employment and housing growth being delivered.

2.33 The district has 65 business parks that provide an anchor for many of the Small and Medium Enterprises (SMEs) that underpin these sectors and associated clusters.

2.34 South Northamptonshire has one of the lowest unemployment levels in the UK. The average commute for settlements along the A43 corridor is almost 20 kilometres suggesting much of this employment involves a certain level of out commuting.

2.35 The resident workforce is highly skilled and professional with 38% having qualifications at the NVQ4 level or above compared to 31% for East Midlands. The district has a higher than average number of residents employed in managerial, professional and skilled occupations. This demographic mix suggests a desirable area for locating business (B1) employment uses.







# Contextual Considerations

# 3

### 3. Contextual Considerations

This section identifies some of the contextual considerations that need to be taken into account for each of the employment sites. Each of these considerations have been informed by the need to fulfil the five roles for the employment sites (as listed in item 2.8) and deliver the four objectives, highlighted in each site's design brief and set out in Part 2 Local Plan. These objectives are:

- **Objective 1:** To facilitate economic growth encouraging investment and job creation, aligning training with employers' requirements to get more people into work and reduce levels of unemployment.
- **Objective 2:** To deliver appropriate new employment opportunities in both the urban and rural areas, including home-based working and extended employment areas, facilitated by high-speed broadband.
- **Objective 3:** To facilitate tourism and leisure related growth creating a distinct offer within North Northamptonshire.
- **Objective 9:** To conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes.

3.1 This section includes the following contextual consideration:

- the existing scale, form and character of development along the M1 and A43 relating to **AL1 - AL4**;
- the establishment/enhancement of two key gateways, a northern gateway into Towcester relating to **AL1 & AL2**, a gateway marking the A5's transition from a rural to more urbanised context relating to **AL5**.
- Respectfully and sensitively setting new development within/adjacent to a rural context to the north of the A43 relating to **AL1 & AL2** and the Ouse Valley Parkland relating to **AL5**.

Future applicants should identify opportunities where new development can contribute/respond positively to these contexts. These contextual considerations are not intended as an exhaustive contextual assessment for each site. As such further contextual assessment work will need to be undertaken at planning application stage to determine any further contextual considerations.

3.2 The role of the employment sites are in part to:

- " Meet local demand and strengthen the rural economy;
- Provide the ability to strengthen local supply chains;
- Local flexibility and choice of locations;
- Meet the demand for small and medium sized units; and
- Contribute to reducing the level of out commute."

3.3 In order to help establish a common understanding of what **small, medium** and **large** building/unit sizes are, this section sets out a clear definition on pages 38 & 39. These definitions are informed by series of contextual considerations and an understanding of the existing scale, form and character along the M1, A43 and around the Ouse Valley Parkland. **These definitions should be applicable to the appropriate building/unit sizes set out within the development frameworks in section 6.**



## M1 Corridor - Scale, Form and Character

"Provide the ability to strengthen local supply chains."

Paragraph 13.1.5, Part 2 Local Plan

3.4 This section briefly highlights the **large** form, scale and character of employment development located along the M1, contrasting this, over subsequent pages, with development located along the A43.

3.5 There are a series of large scale industry / distribution developments located along the M1 near Northampton. These accommodate some of the biggest retail operators in the country, drawn to a regional connectivity that includes direct motorway links to London, Birmingham (via the M6) and the cities of Leeds, Milton Keynes, Leicester, Nottingham, and Sheffield, among other key settlements.

3.6 The most local example of these developments is found at Swan Valley (1), situated adjacent to junction 15A, which is a large scale strategic distribution park with units ranging in size from approximately 8,000m<sup>2</sup> to 50,000m<sup>2</sup>.

Figure 4 Swan Valley at junction 15A of the M1 accommodating large units of between 8,000m<sup>2</sup> to 50,000m<sup>2</sup>, refer to page 26 for mapped location

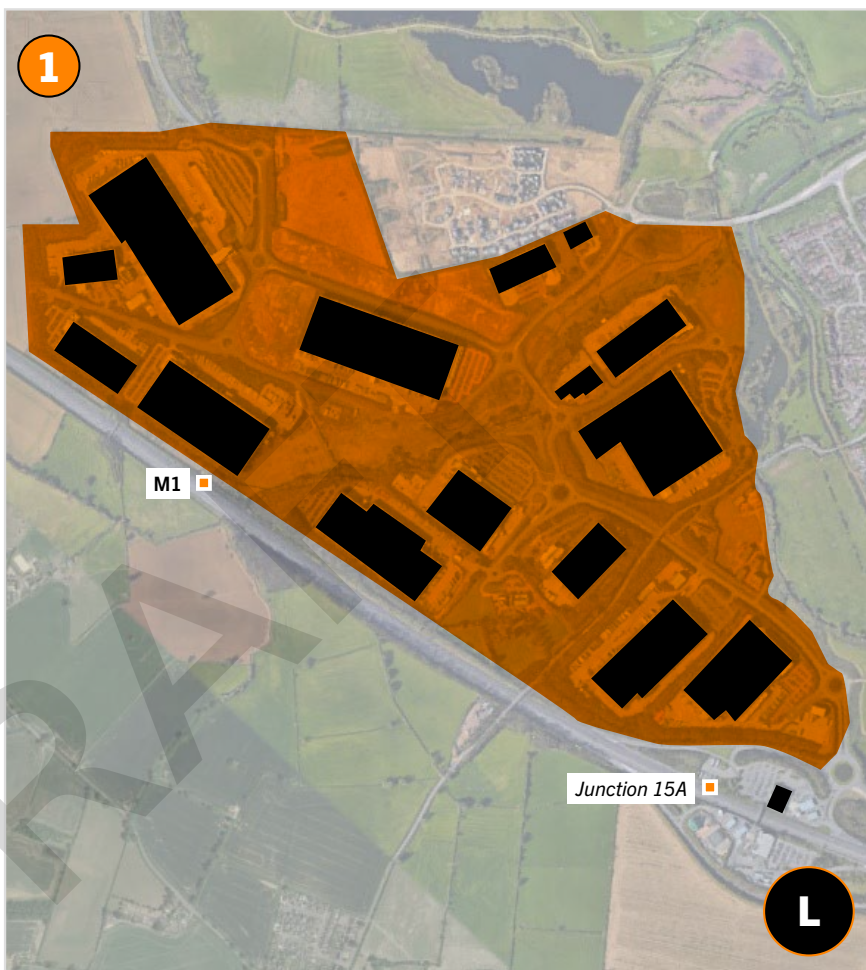


Figure 5 Swan Valley's location adjacent to Northampton and the A43

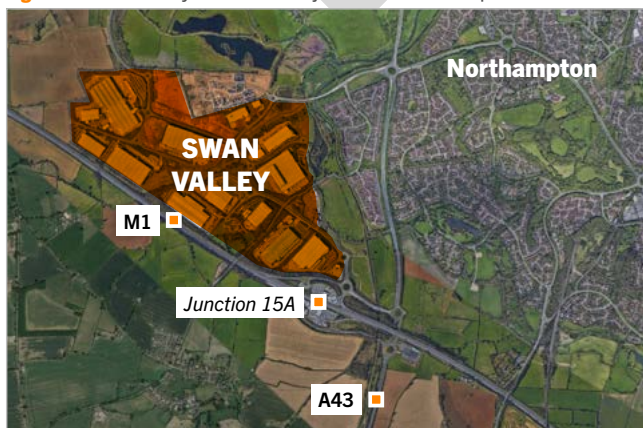


Figure 6 Typical distribution Centre building in Swan Valley



Relevant to AL1 - AL4

Supporting LP Objectives Objective 1 - "Deliver appropriate new employment opportunities in both the urban and rural areas." Page 1073

## A43 Corridor - Scale, Form and Character

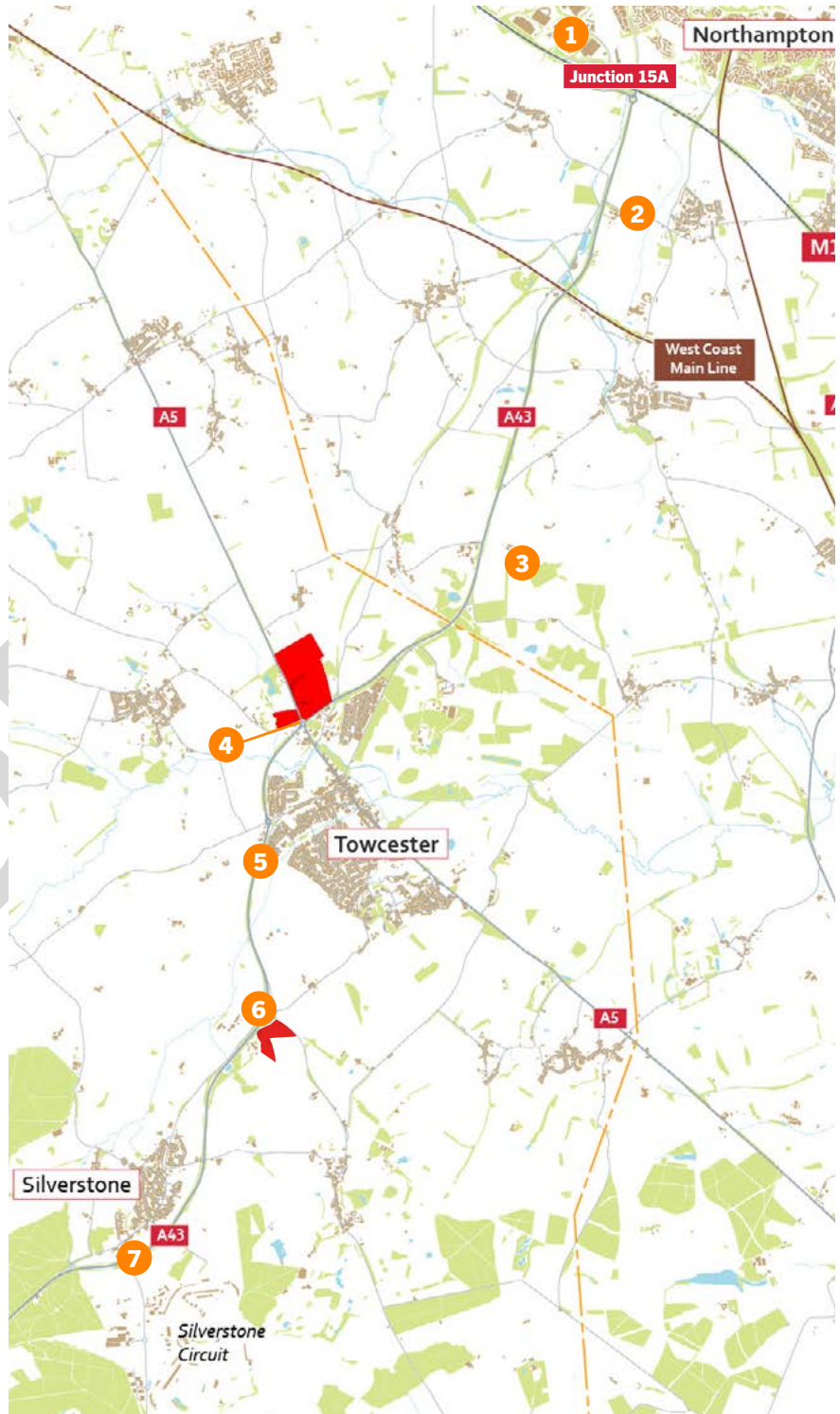
"Meet the demand for small and medium sized units."

### Part 2 Local Plan

3.7 This section considers the character of the A43 from the M1 down to Silverstone Circuit. It demonstrates the **small** and **medium** scale, form and character of employment development. This helps to define an appropriate scale range for buildings/units within the four sites.

3.8 The A43 provides a key connection to the M1 for the settlements of Towcester, Silverstone and Brackley, continue west to connect up to the M40. As the A43 approaches Towcester it takes on a rural character. This is evidenced by the frequency of local junctions providing links to rural settlements, such as Shutlanger & Tiffield, The Gateway School & Technology Centre and to Northampton Road, which provides access to Towcester. There are also a series of uncontrolled pedestrian

Figure 7 Contextual plan showing key employment uses around junction 15A on the M1 and along the A43



- 1 Swan Valley Distribution Park (figures 4-6)
- 2 Small area of industry (figure 8)
- 3 Top Farm, small leisure/retail/distribution development (figure 9)
- 4 Tove Roundabout (figure 10-14)
- 5 Abthorpe Junction
- 6 A413 Junction (figure 15)
- 7 Dadford Rd / Silverstone Junction (figure 16)

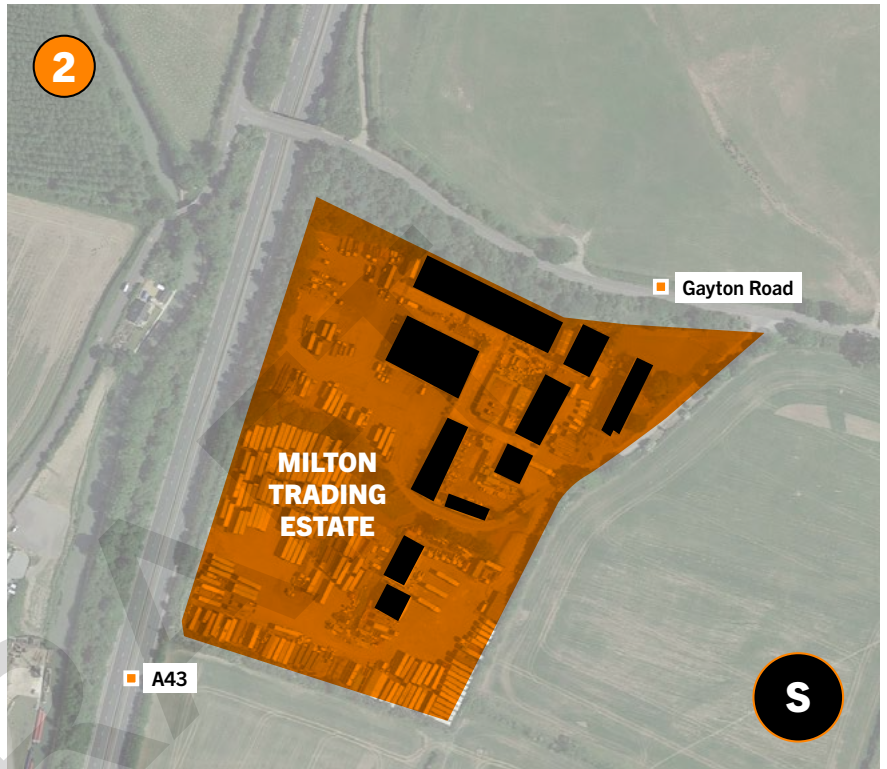
- Site
- Built up area
- Woodland
- Water
- Road
- Railway
- Power line



crossings, a result of PRowS crossing the A43 to connect many of these surrounding settlements.

3.9 There is little in the way of industrial / employment between the M1 and Towcester, what there is tends to either be situated adjacent to the A43, without direct access onto it, such as Milton Trading Estate (2) or accommodating a mix of agricultural & leisure uses, such as Top Farm (3). These developments are also screened by a mix of vegetated embankments and semi mature tree planting and/or low level vegetation that bound much of this stretch of the A43.

**Figure 8** Milton Business Park adjacent to A43 including small unit sizes ranging from 300m<sup>2</sup> to 1,700m<sup>2</sup>



**Figure 9** Top Farm, a small leisure/retail/distribution development, including a mix of small and medium unit sizes ranging from 600m<sup>2</sup> to 4,500m<sup>2</sup>



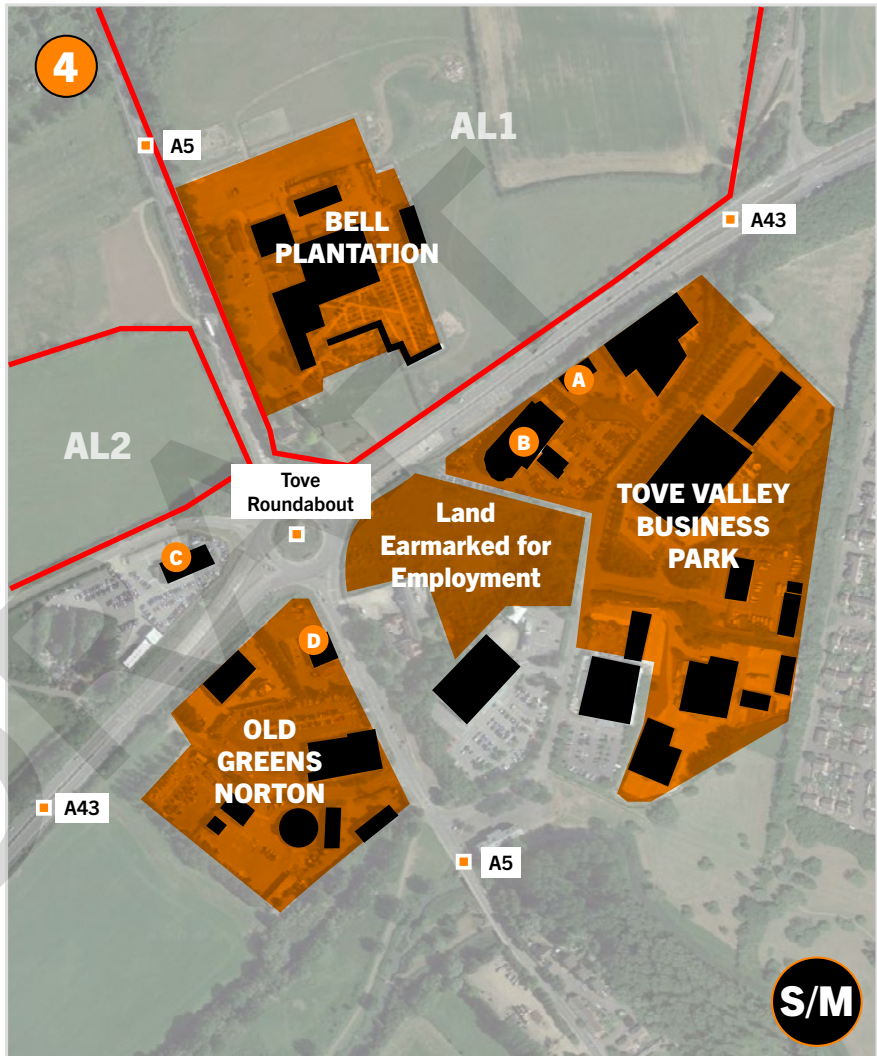
**AL1 & AL2 - Towcester A43 Junctions**

3.10 On approach southbound to the Tove Roundabout (4) street lighting appear on the roadside along with a mix to buildings/units, including a Screwfix, the Bell Plantation and, most prominently, the Porsche Centre Silverstone. These are setback behind landscape strips comprising a mix of grass verge and hedgerow. On the roundabout Jardine Select, a car dealership and Esso Garage are visible and identified by banners and totum signage.

3.11 There are several areas that accommodate a mixture of business and light industrial uses adjacent to the roundabout. Old Greens Norton Road, to the south of the roundabout with a mix of business and light industry centred around an Aldi Store. This area accommodates units that vary between 350m<sup>2</sup> and 1,800m<sup>2</sup>. Tove Valley Business Park sits to the east of the roundabout - beyond land earmarked for employment use - it accommodates units that vary between 350m<sup>2</sup> and 5,000m<sup>2</sup>. Bell Plantation comprises a series of small buildings that combine to form a relatively large footprint, however its scale is representative of a collection of small retail/office units.

3.12 On the western edge of Towcester is Abthorpe Roundabout (5), linking the A43 to the town via Brackley Road. It accommodates a series of small units/buildings that include a takeaway restaurant, hotel and petrol station.

**Figure 10** Series of business parks and clusters situated around Tove Roundabout



- A** Screwfix
- B** Porsche Silverstone Centre
- C** Jardine Select Towcester
- D** Esso Garage



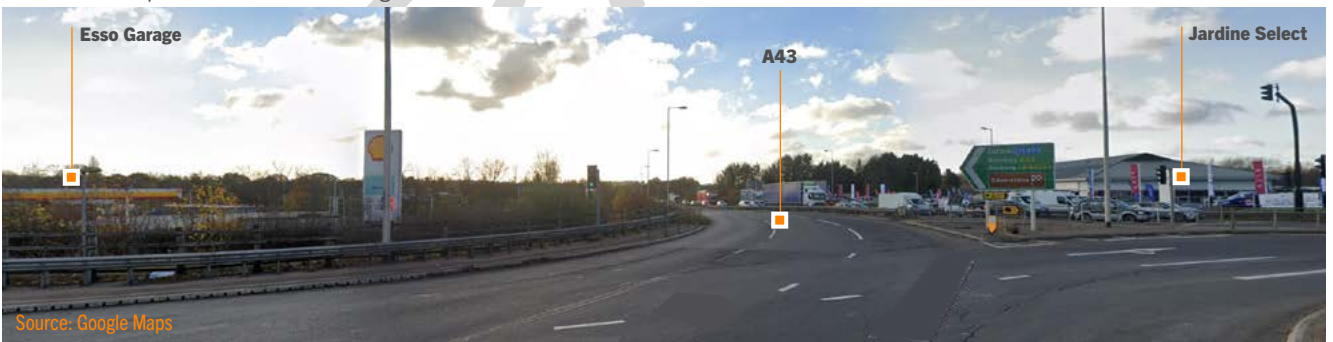
**Figure 11** Tove Valley Business Park with buildings/units between 350m<sup>2</sup> and 5,000m<sup>2</sup>



**Figure 12** Eastbound view along the A43 showing a change in the road's frontage/edge from tree planting to grass verge, hedgerow planting and street lighting marking an the approach to Tove Roundabout, with the scale and form of the Porsche building prominent in the background



**Figure 13** Westbound view on the Tove Roundabout showing how the Esso Garage and Jardine Select provide a busy/cluttered frontage onto the A43 with totem poles and banners seeking to draw attention.



**Figure 14** Old Greens Norton with buildings/units between 350m<sup>2</sup> and 1,800m<sup>2</sup>



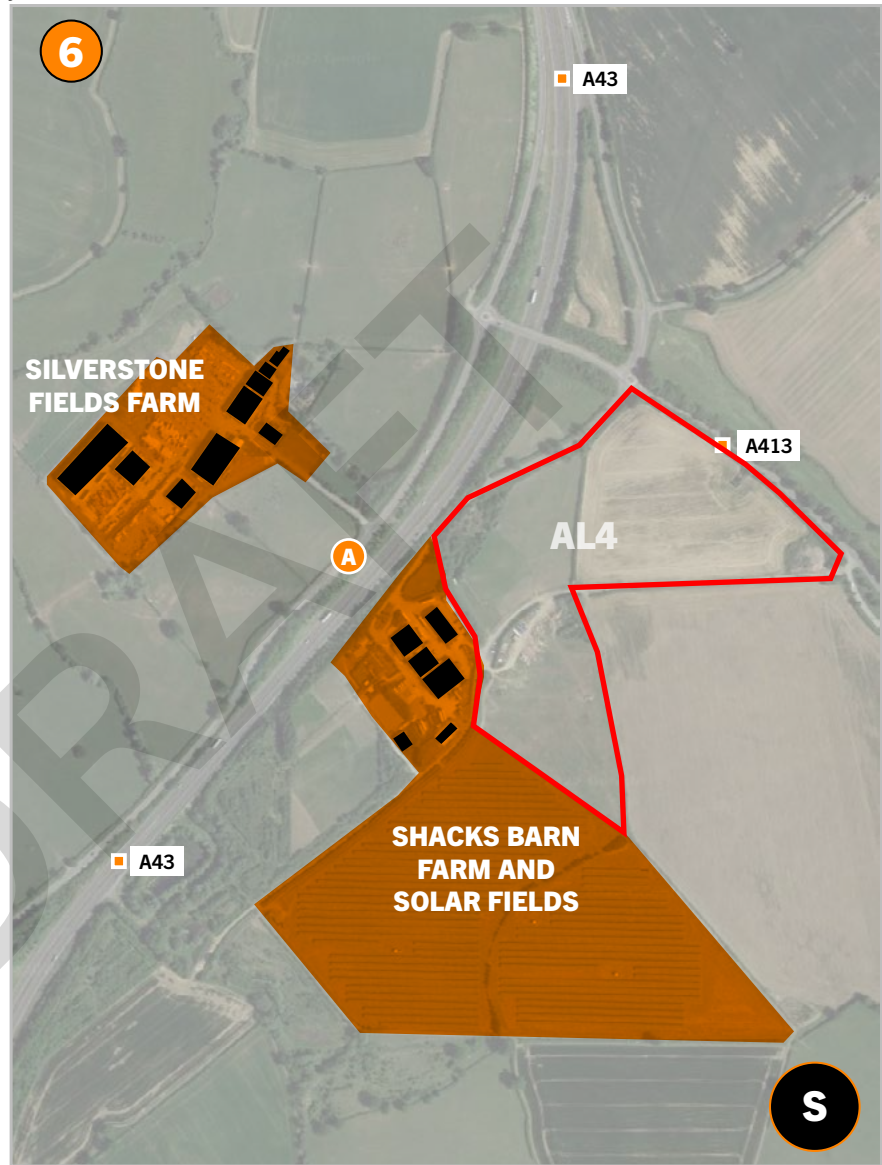
**AL4 - Technology Corridor**

3.13 At the A413 junction (6) there are two areas of industrial / employment land uses each of which accommodate a range of small to medium units/buildings. Silverstone Fields Farm accommodates units of between 375m<sup>2</sup> and 2,500m<sup>2</sup> and Shacks Barn Farm (also referred to as Silverstone Business Park) accommodates units of between 250m<sup>2</sup> and 1200m<sup>2</sup>. The area is also home to several solar farms, one to the immediate south of AL4 and another 650 metres west of the A43.

3.14 Further south a range of business and light industry is situated within Silverstone Park, approximately 700 metres south of the Dadford Road junction of the A43 (7). These are immediately adjacent to Silverstone Circuit and accommodate a mix of small and medium units/buildings, between 500m<sup>2</sup> and 5,000m<sup>2</sup>. The scale, form, character and use of this park are heavily informed by Silverstone Circuit, which has led to a cluster of technology and motorsport-related employment uses located within units similar in scale to the buildings within the circuit.

3.15 Combined with green energy employment uses at the A413 junction there is a corridor of technology-related employment emerging along this stretch of the A43.

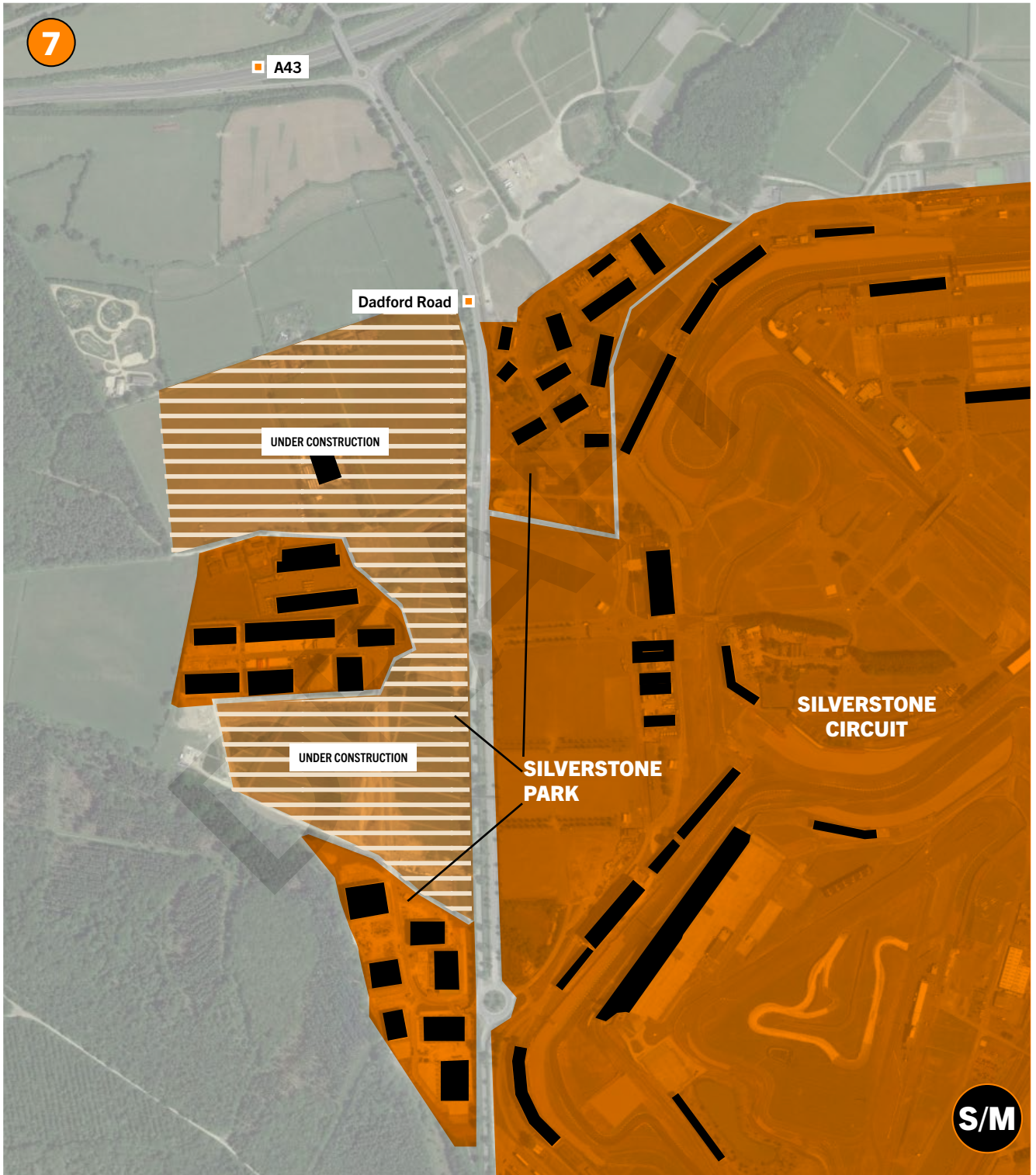
**Figure 15** Series of business parks and clusters including small units situated around A413 junction



- A** Southbound access onto A43 via Silverstone
- B** Northbound access onto A43



Figure 16 Silverstone Park, accommodating a mix of small and medium units of between 500m<sup>2</sup> and 5,000m<sup>2</sup>



Relevant to

AL1, AL2 & AL4

Supporting LP Objectives

Objective 1 - "Deliver appropriate new employment opportunities in both the urban and rural areas..."

## Rural Setting North of A43

"Meet local demand and strengthen the rural economy"

### Part 2 Local Plan

3.16 The area surrounding AL1 & AL2 to the north of the A43 is made up of agricultural land, with an arrangement of small and large fields defined by boundaries of hedgerow with intermittently tree planting. The rural character is reinforced by land form that gently slopes north to south down to the River Tove with views from the public road and path network towards Towcester and the wider countryside.

3.17 Situated within this landscape are a series of small rural settlements. Aside from the A5, which bisects the area and Towcester Road, which links the A43/Towcester to Greens Norton the road network is made up of single track country roads.

3.18 There are more substantial blocks or corridors of tree planting situated nearer the A43 to frame recreation, leisure or retail development, such as the Towcestrians Sports Club. Many of the buildings associated with these land-uses are of a height and scale in keeping with that of large agricultural buildings in the area.

3.19 The ability to provide development whose form and scale considers the rural character of this area through built or landscape elements will enable a more gradual and sensitive transition from north Towcester to the surrounding countryside.

Figure 17 Photo showing rural character of area north of A43



Figure 18 Photo of Caldecote one of several small rural settlements in this area



Figure 19 Typical agricultural building situated within the area north of the A43



Figure 20 Building associated with Towcestrians Sports Club, similar in scale and mass to the agricultural buildings found in the area





**Figure 21** Plan showing rural character of land to the north of the A43, with farmland separating small rural settlements



Relevant to **AL1 & AL2**

Supporting LP Objectives **Objective 9 - "...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscape"**

## Towcester Northern Gateways

"Contribute to reducing the level of out commuting... ...Local flexibility and choice of locations" "

Part 2 Local Plan

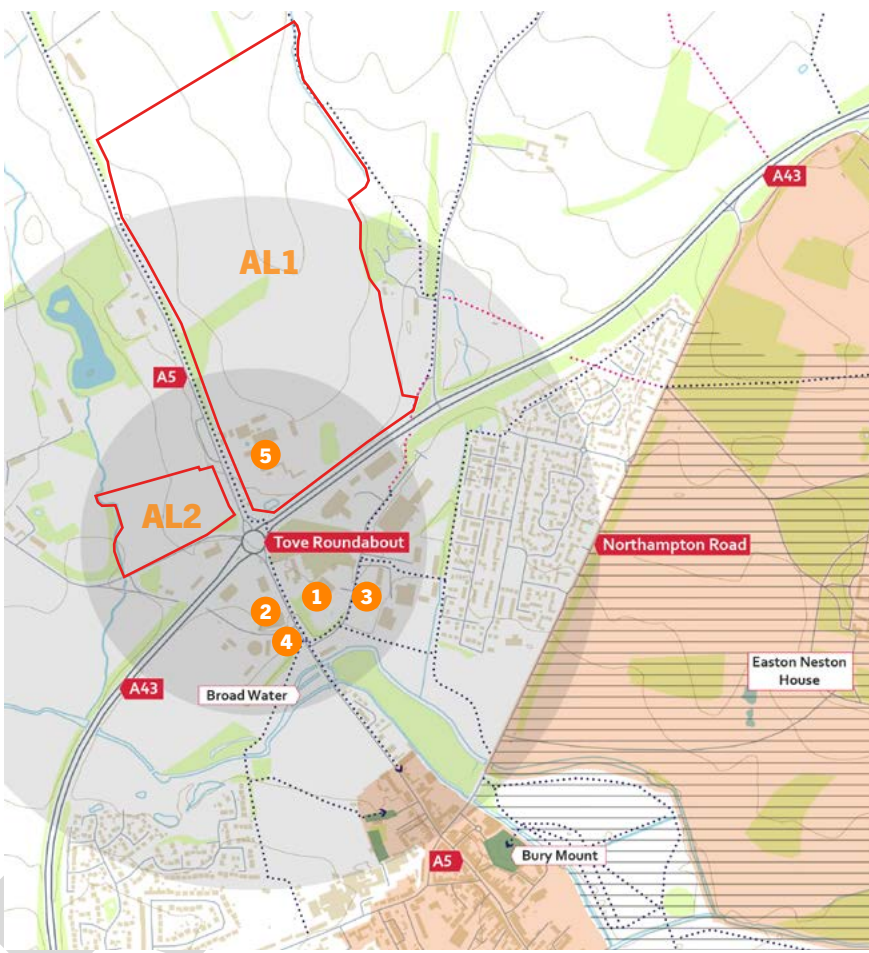
3.20 AL1 & AL2 are situated adjacent to Tove Roundabout, a key accessible gateway into north Towcester, sitting approximately 10 minutes walk from the town centre. Tove Roundabout is currently surrounded by a range of services and facilities that cater to residents of the town and the surrounding area. Most notable is a Tesco and Aldi supermarket and a B&M Home Store, each of these are connected to the centre of Towcester and outlying residential areas via a network of footpaths.

3.21 On the northern side of the roundabout is the Bell Plantation, this includes a range of local resources, many of which appear to be 'start up' businesses. This area includes a nursery, vet, dog behaviourist, make-up clinic, dog groomer, hairdressers, indoor playground and garden centre, amongst others. This cluster of uses indicate that the area is regularly used and visited by local residents, presenting an opportunity to introduce further service provision / employment land use of a similar nature. If delivered sensitively and in line with policy this could see the delivery of some small, medium and in exceptional circumstances, large development units.

"Local flexibility and choice of locations"

Paragraph 13.1.5, Part 2 Local Plan

Figure 22 Plan showing services around Tove Roundabout and their accessibility from Towcester



- 1 Tesco
- 2 Aldi
- 3 B&M Home Store
- 4 Wellbeing Fitness
- 5 Bell Plantation- incorporating a range of different small to medium local businesses

- 5 and 10 minute walking catchment
- Footpaths
- Conservation Area
- Parks and Gardens
- Scheduled Ancient Monument

3.22 Bell Plantation is accessed via a continuous footpath running along the eastern edge of the A5 to Towcester Town Centre, with signalised crossings on the A43. New development may provide the opportunity to create a more active and distinctive approach to Towcester and the Northern Gateway from along the A5 and A43.

3.23 This northern gateway act as a key arrival point into the historic settlement and its function should be fully considered relative to the design quality of proposals at AL1 & AL2, as well as scale and massing.

Relevant to

AL1 & AL2

Supporting LP Objectives

Objective 3 - "...to facilitate tourism and leisure related growth.

Objective 9 - "...high quality design that is respectful to heritage assets and their settings..."



## Old Stratford Gateway

3.24 AL5 occupies a prominent and visible site at the Old Stratford Roundabout, which provides a key transition from a rural single carriageway stretch of the A5 from Towcester to a more built up dual-carriageway stretch, continuing towards and through Milton Keynes. Current uses here include a Travelodge, car dealership, small office/retail buildings and an area of housing. Employment uses are all of a small scale with footprints ranging from 600m<sup>2</sup> to 1200m<sup>2</sup>.

3.25 The buildings that currently sit beside the roundabout, although visible do not actively address the roundabout or form a positive gateway for the area. With AL5 there is an opportunity for any future buildings/units to be sited, orientated and include a high quality facadal treatment that allow them to positively address the roundabout and enhancing the visual approach to it, particularly when travelling southeast bound along the A5. While at the same time contributing to the mix of uses that currently preside beside the roundabout, bringing a mix of activity and employment opportunities.

**Figure 23** Image showing the Old Stratford Roundabout that marks a transition in the character of the A5



**Figure 24** Photo showing new housing and linear parkland space fronting onto the roundabout



Relevant to

AL5

Supporting LP Objectives

**Objective 9** - "...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes.

**Objective 1** - "Deliver appropriate new employment opportunities in both the urban and rural areas..."



## Ouse Valley Parkland

"Contribute to reducing the level of out commuting."

### Part 2 Local Plan

3.26 The eastern end of AL5 abuts the Ouse Valley Park, an area of managed accessible semi-rural parkland that extends from the northern edge of Wolverton westwards, cutting across the A5 and between Old and Stony Stratford. The parkland is accessed via a series of PRow and informal paths and is characterised by the River Great Ouse, Grand Union Canal and two nature reserves.

3.27 The Dogsmouth Brook, runs both through and along the northern edge of AL5 and feeds into the river. The Old Stratford Arm section of the Grand

Union Canal Conservation Area cuts through the centre of the site. A footpath overpass already provides links across the A5, connecting the parkland footpath network with paths along the Old Stratford Arm to Cosgrove, in addition to paths linking to settlements to the north west, such as Potterspurly.

3.28 This series of natural & heritage features and network of footpaths within AL5 help connect it both physically and in terms of character to the wider parkland area. This offers an opportunity, as part of any future development in AL5 for a sensitive extension to the Ouse Valley Parkland.

3.29 There are a number of example employment areas that bound or are in close proximity of the Ouse Valley Park. Wolverton Mill Business Park is

connected to the Ouse Valley via an area of parkland called Wolverton Mill Balancing Lake. It provides a mix of B1, B2 and B8 employment uses, with units ranging in size from 500m<sup>2</sup> to 7,150m<sup>2</sup> and Old Wolverton Road Industrial Park, with a mix of B2 and B8 employment uses and units ranging in size from 220m<sup>2</sup> to 33,000m<sup>2</sup>.

3.30 The use of B1 employment and small buildings along its parkland edge allows Wolverton Mill to integrate into its parkland setting. Old Wolverton's inclusion of distribution and light industry results in less integration with the adjacent parkland, with a substantial (20-30 metre) tree belt screening development from the parkland. AL5 has the opportunity integrate new employment with the adjacent parkland, seeing it as a resource to enhance the employment offer it provide.

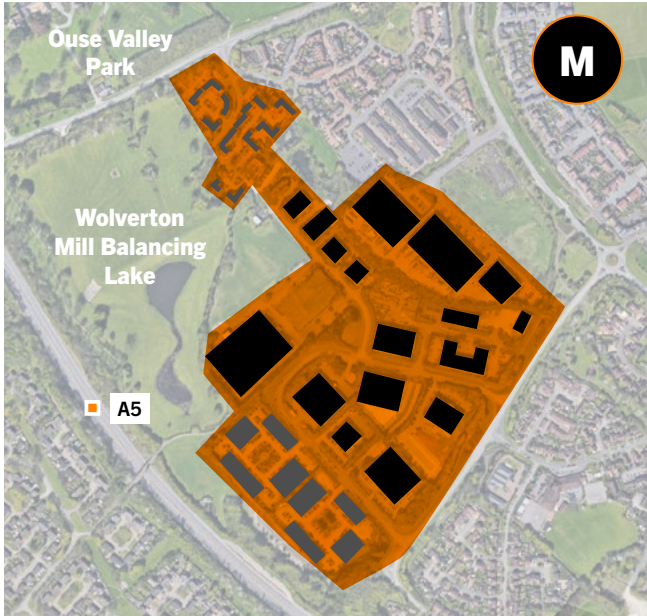


**Figure 25** Plan showing Ouse Valley Parkland in relation to site and a number of employment sites that also abut the parkland

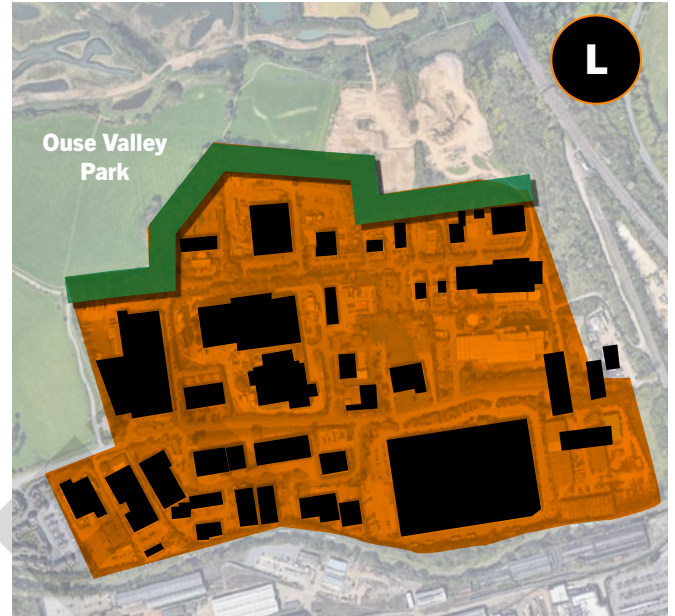
- 1** Stratford Arm
- 2** Wolverton Mill Balancing Lake
- 3** Footpath under A5 linking AL5 to Ouse Valley
- 4** Stony Stratford Nature Reserve
- 5** The Floodplain Forest Nature Reserve
- Flood Plain Area
- Conservation Area
- Scheduled Ancient Monument
- Ouse Valley Park
- Footpaths



**Figure 26** Wolverton Mill Business Park with a mix of B1 (in grey), B2 and B8 employment uses with units ranging in size from 500m<sup>2</sup> to 7,150m<sup>2</sup>



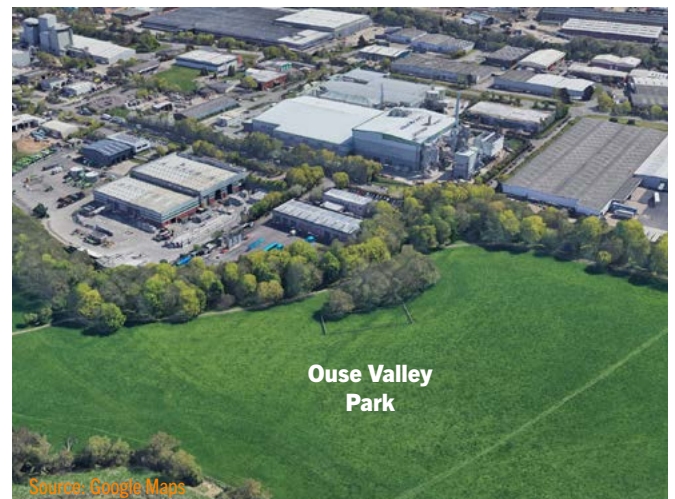
**Figure 27** Old Wolverton Industrial Park with a mix of B2 and B8 employment uses with units ranging in size from 220m<sup>2</sup> to 33,000m<sup>2</sup>



**Figure 28** Wolverton Mill Business Park has office buildings adjacent to and overlooking adjoining parkland



**Figure 29** Old Wolverton Industrial Park has a substantial tree belt screening large scale industrial uses from the parkland



Relevant to

AL5

Supporting LP Objectives

Objective 9 - "...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes.

Objective 1 - "Deliver appropriate new employment opportunities in both the urban and rural areas..."

## Small, Medium and Large Unit Sizes

The existing scale of employment buildings/units along the section of the A43 identified in this assessment set a context for the scale of new development. The area, as it approaches and passes Towcester has primarily seen the development of small business, light industrial and distribution parks that incorporate small buildings/units. The existing scale of employment buildings/units along the A43 sets a precedent scale for new development on sites AL1, AL2 & AL4 and helps to define a scale for small, medium and large.

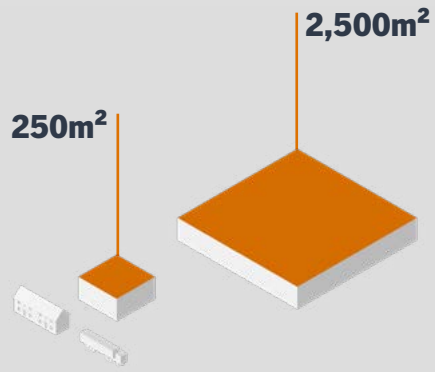
- **Small** reflects the size of buildings in small areas of employment along the A43, such as Milton Trading Estate and Silverstone Business Park (Shacks Farm Barn), where building footprints range in size from **250m<sup>2</sup>** to **2,500m<sup>2</sup>**.
- **Medium** is broadly representative of many buildings found in a number of business parks along the A43, such as Tove Valley Park and Silverstone Park with a maximum footprint being set by the smallest distribution units found at Swan Valley on the M1. Medium building footprints range in size from **2,500m<sup>2</sup>** to **8,000m<sup>2</sup>**.
- **Large** reflects the scale of buildings/units found in Swan Valley, a distribution park along the M1, setting a minimal footprint of **8,000m<sup>2</sup>**.

For AL5 the scale of buildings in Wolverton Mill provides a broadly similar scale context for small to medium buildings/units, with units ranging from 220m<sup>2</sup> to 7,150m<sup>2</sup>. As such the above will also apply to this site.

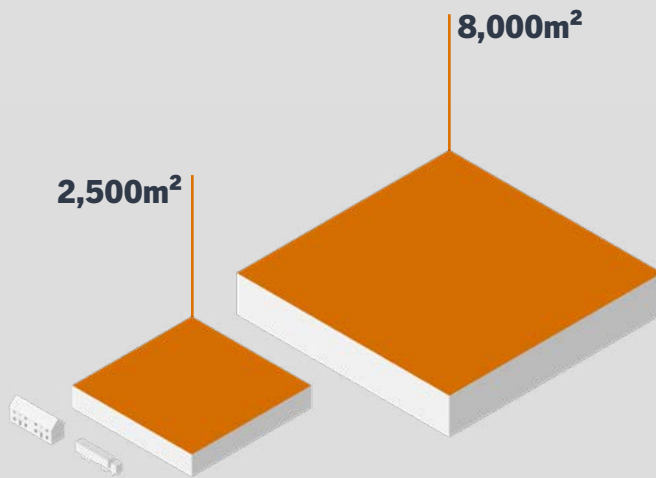
The presumption will be for the accommodation, across the employment sites of a mix of small, medium and in exceptional circumstances, large sized units, as defined above. This will allow them to support, as the design brief's state:

**"a variety of employment types... ..to reflect the need for diversity and resilience in the local economy".**

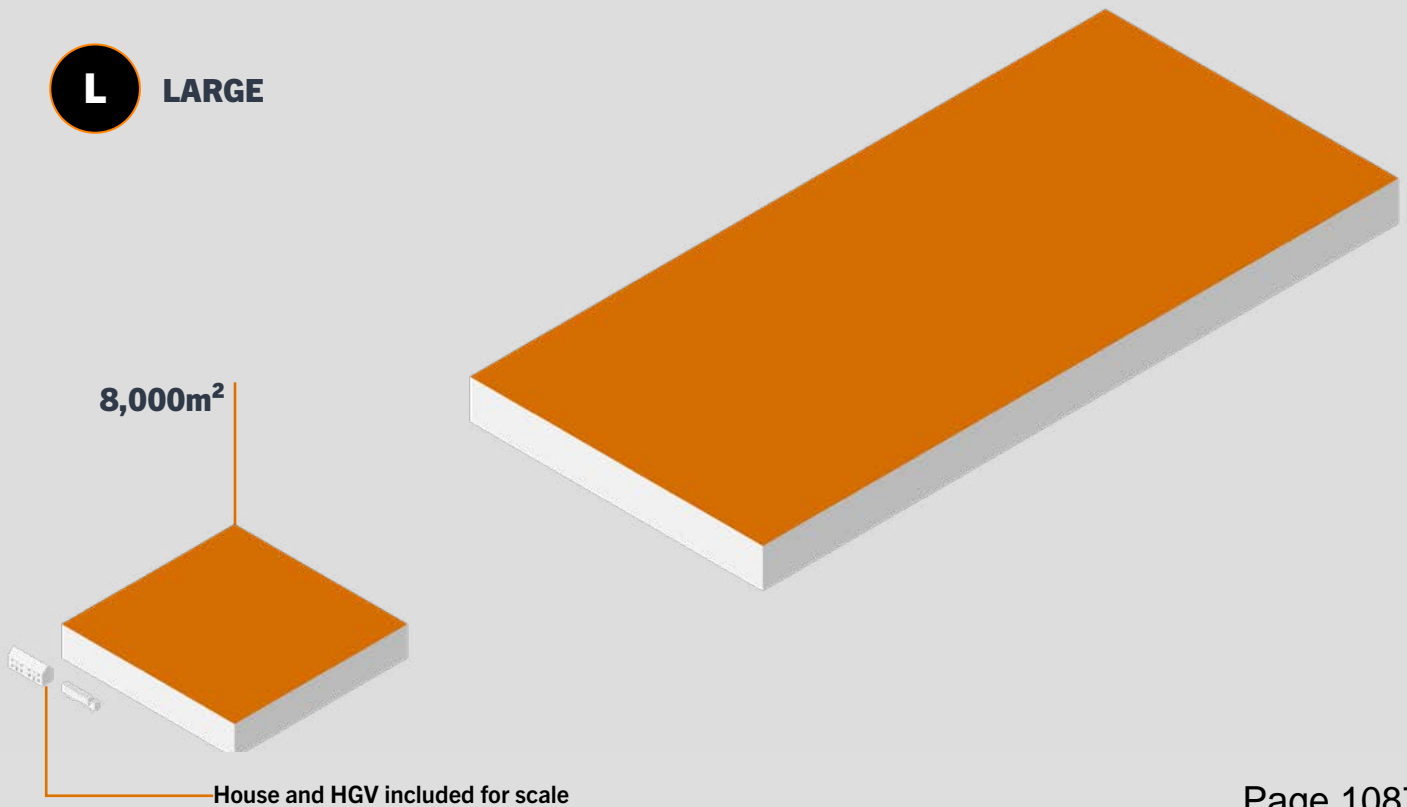
**S** SMALL



**M** MEDIUM



**L** LARGE







# Landscape and Visual Consideration

# 4

## 4. Landscape and Visual Consideration

This section sets out a high-level landscape and visual considerations for each of the four employment sites. It includes a series of potential sensitive receptors that have informed the identification of 'Sensitive Areas' within each site, as outlined at the end of each summary and illustrated in the development frameworks throughout section 6.

4.1 The landscape and visual context of the four employment sites needs to be considered, as stated by Local Plan Objective 9:

**...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes.**

4.2 The sensitive receptors in this section have been identified from a mix of desktop study and site visit. They are not intended as an exhaustive representation of the potential visual impact of development on each site and do not assess receptors in terms of significance or the views in terms of sensitivity. As such further landscape and visual assessment work will need to be undertaken at planning application stage to determine the sensitivity of receptors and the significance of impact.

### AL1 & AL2 - Visual Summary

#### A. Views from surrounding countryside (Greens Norton / Duncote / Caldecote / Tiffield)

4.3 The landform to the north of the A43 is defined by gently raising ridge lines and shallow valleys. Fields situated immediately adjacent to the A43 are large in size with a patchwork of smaller fields north of AL1. The countryside is highly accessible with an extensive network of public rights of way and bridleways.

4.4 Short, medium and long distance views of AL1 and AL2 are offered from a number of Public Right of Ways (PRoWs), bridleways and country lanes situated to the north of the A43. These offer an important visual connection to the wider geography and landscape of the area, much of which is still rural in character. Development within the two sites has the potential to impact this character particularly on approach to rural settlements from Towcester. The identified receptors are visible from:

- PRoW SA4 and SA2 linking south from Tiffield to the A43 with potential western views of AL1 (vp1, 2 & 11).
- PRoW RN11, linking Greens Norton to the A5 with potential views of AL1 and AL2 (vp3).
- PRoW RN15 and SB8, linking Greens Norton south to the A43 with potential views of AL1 and AL2 (vp4 & 5).
- PRoW RN10, linking Duncote south to the A5 with potential views of AL1 (vp14).

4.5 In addition local views of AL1 are offered from several points along PRoW SB1, which leads down from Caldecote, running along the eastern edge of AL1 (vp6 & 13).

#### B. Views from A5 and A43 Corridors

4.6 The A5 sits on land that gently drops as it approaches the Tove Roundabout and Tove Valley beyond. As the A5 passes the northern half of AL1 a clear view into the site is offered through limited roadside vegetation (vp7). Continuing south AL1 is soon screened by a mature belt of woodland and viewed within a foreground context of the Bell Plantation site. On the opposing side of the A5 Southbound views of AL2 open up at that site's north eastern corner, disappearing on approach to Tove Roundabout (vp8). These southbound views of the sites should be considered within the visual context of the A5's approach to Tove Roundabout, where views of existing development start to appear.

4.7 The A43 sits on land that gently falls in a south westerly direction, as it heads towards Tove Roundabout. Cut and fill works have resulted in it sitting either at grade or below the level of the surrounding countryside. A raised embankment and semi-mature tree & shrub planting limit immediate views of the southern half of AL1 from the A43 corridor (vp9). As the Tove Roundabout is approached signage associated with Bell Plantation is visible from the roadside, as are a number of buildings set further north into AL1 (vp12).



4.8 Westbound views of AL2's frontage along the A5 and Towcester Road are visible along the A43, at the Tove Roundabout, partially screened by tree planting at approximately 10-12 metres (vp10). These views along the A43, near the Tove Roundabout should be considered in relation to the existing business and industrial development that abut the road and roundabout.

**C. Views from Easton Neston House and Grounds and Towcester Race Course**

4.9 Views of the site are considered limited from the house or grounds, however AL2 does sit on the alignment of a tree-lined avenue in front of the House. This provides a visual link from the House to the church in Greens Norton (vp16). Future proposals for AL2 should consider views along this alignment when preparing the arrangement, height and massing of any built form.

4.10 There are distance views of the site from the southern edge of Towcester Racecourse, approximate 2.5 km south of the two sites. These views are currently set against rising land form and tree & woodland planting along field boundaries (vp15).

Figure 30 Plan highlighting key visual receptor areas around AL1 & AL2

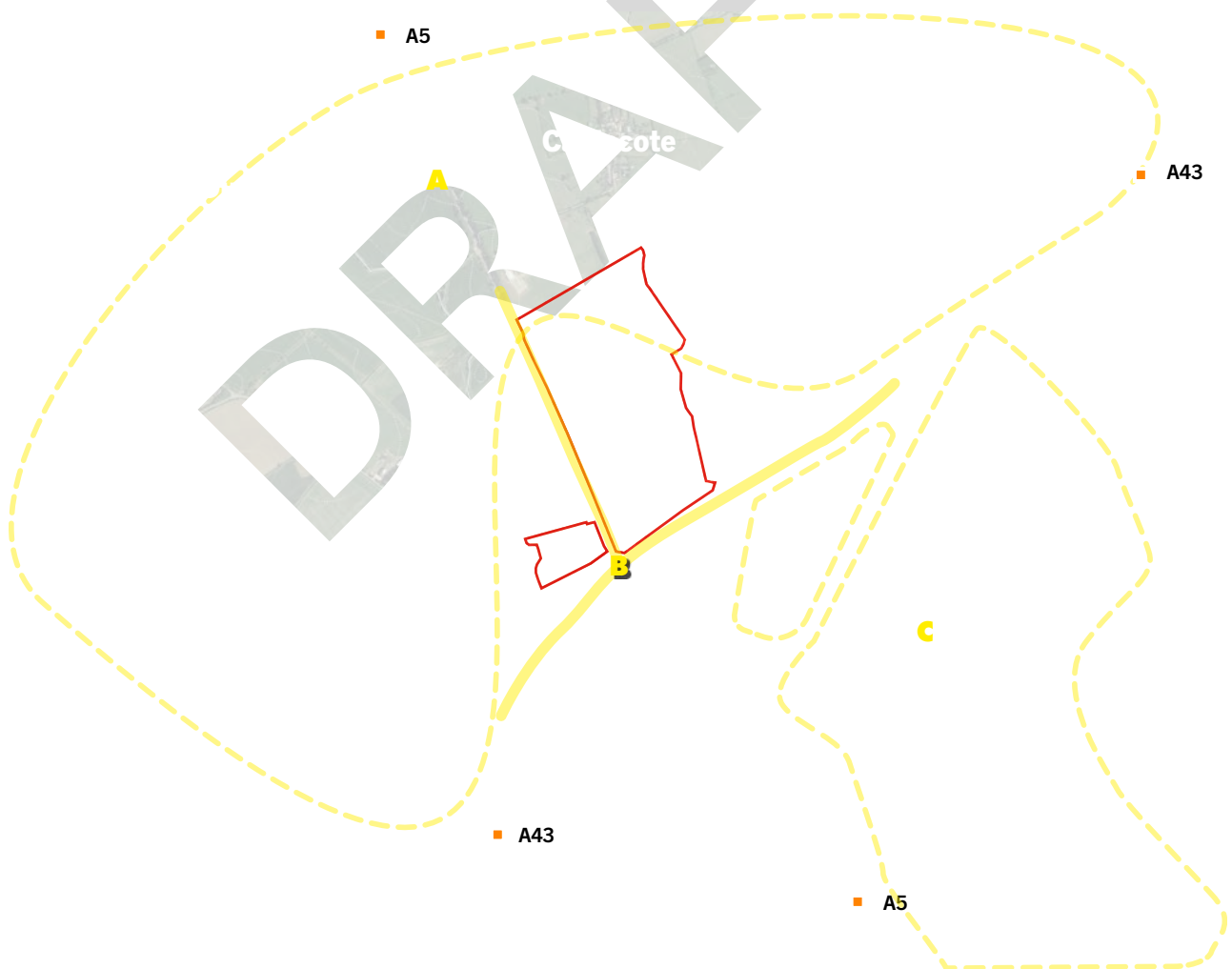
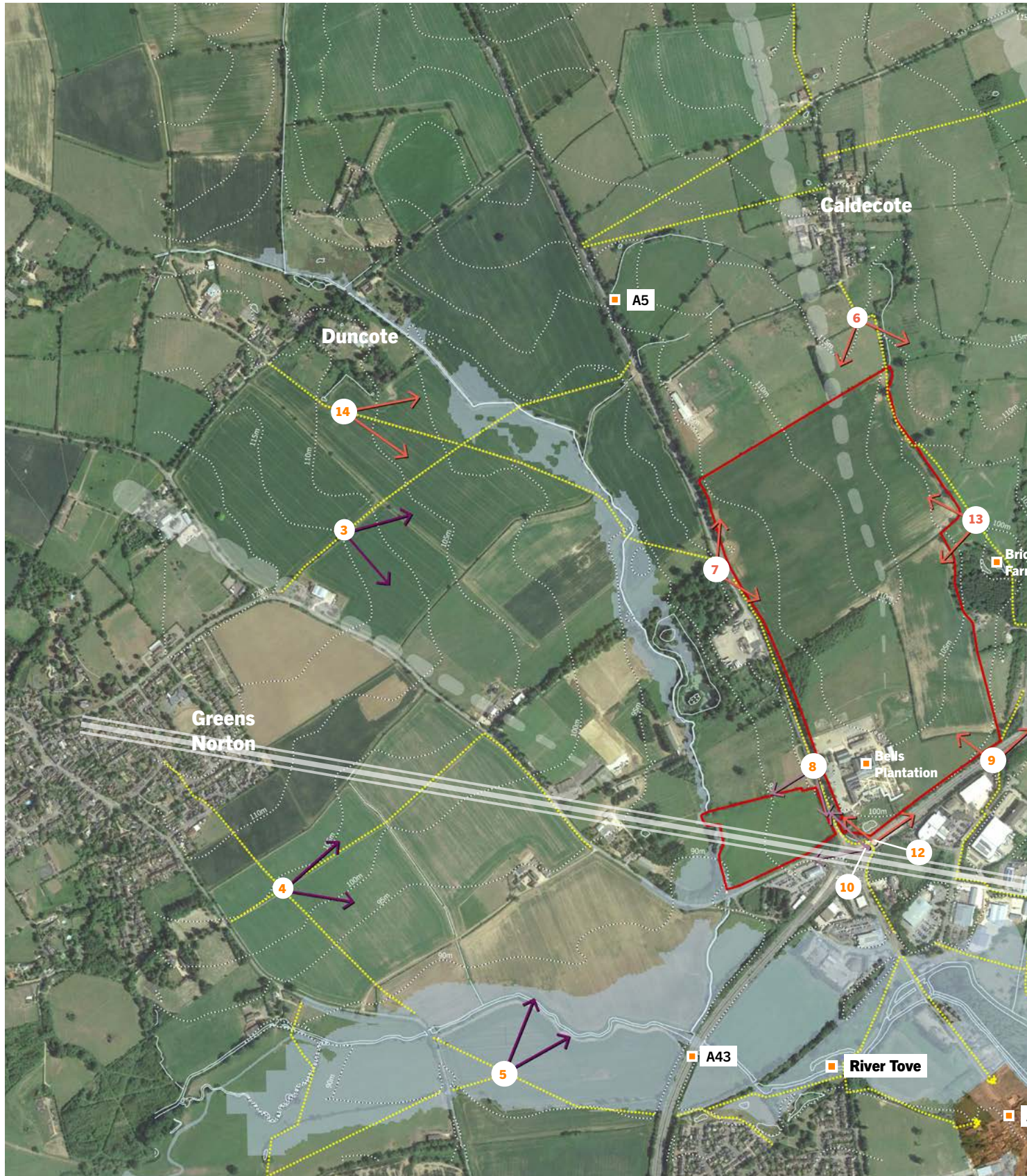


Figure 31 Plan showing potential sensitive receptors for AL1 & AL2, numbers are referenced in text on pages 42-43 and shown in photos over pages 46-49







- Conservation Area
- Parks and Gardens
- Viewing Corridor between Easton Neston House & Greens Norton Church
- Scheduled Ancient Monument
- Public Rights of Way (PRoW)
- AL1 Potential Sensitive Receptor
- AL2 Potential Sensitive Receptor
- AL1 and AL2 Potential Sensitive Receptor
- Watercourse
- Local Ridge lines

**Visual sensitivity AL1 & AL2**

**AL1** - There is a need for greater sensitivity in developing areas along the northern and north eastern edges of the Sites due to the rising topography and rural character of the land making this part of the site sensitive to receptors from the north, east and west, across the countryside from several PRoWs, country roads and villages.

**AL2** - There is a need for greater sensitivity in accommodating new development within the north eastern & the southern area of the site due to views offered when approaching south along the A5 & west along the A43 and the site's location on a viewing corridor between Easton Neston House & Greens Norton Church.



**Figure 32** Viewpoint 1 looking southwest from PRoW SA4 towards AL1, with power lines characterising the fore to mid ground view



**Figure 33** Viewpoint 2 looking southwest from PRoW SA4 across the landscape towards AL1, with open views beyond towards countryside that sits south of Towcester. Williams Barns and woodland planting provide partial screening.



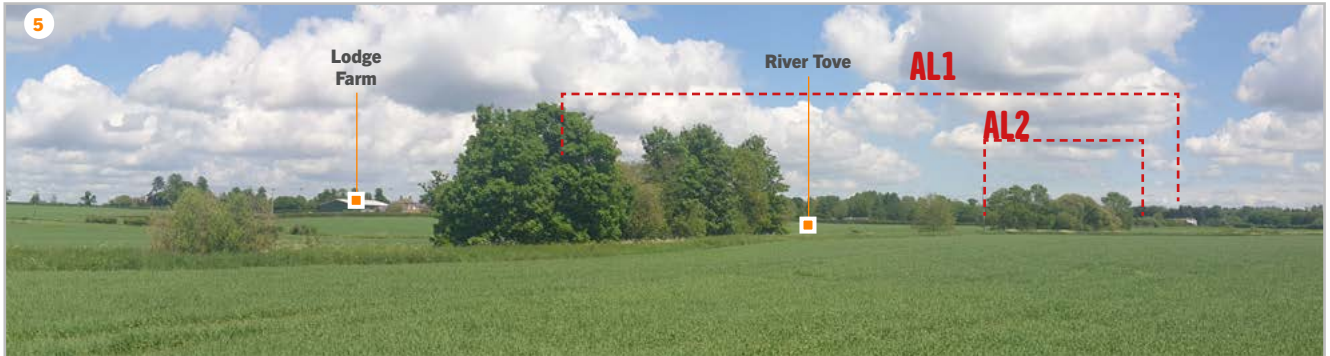
**Figure 34** Viewpoint 3 looking southeast from PRoW RN11 towards AL1 and AL2, with layers of mature tree planting along field boundaries creating a continuous wooded horizon line.



**Figure 35** Viewpoint 4 looking east from PRoW RN32 towards AL1 and AL2, screened by belts and blocks of woodland situated between Towcester Road and the A5



**Figure 36** Viewpoint 5 looking northeast from the joining of PRoW SB8 and SB48 towards AL1 and AL2



**Figure 37** Viewpoint 6 looking south from PRoW SB1 towards AL1 with a belt of woodland screening the north western area of the site and intermittent tree planting lining a field boundary along the site's northern edge



**Figure 38** Viewpoint 7 looking east from the A5 across the northern field of AL1, along a section of the road where there is minimal roadside planting



**Figure 39** Viewpoint 8 looking southwest from the A5 towards AL2, showing minimal roadside and field boundary planting screening the site yet viewed within the context of an approach to the roundabout and the existing access to Bell Plantation

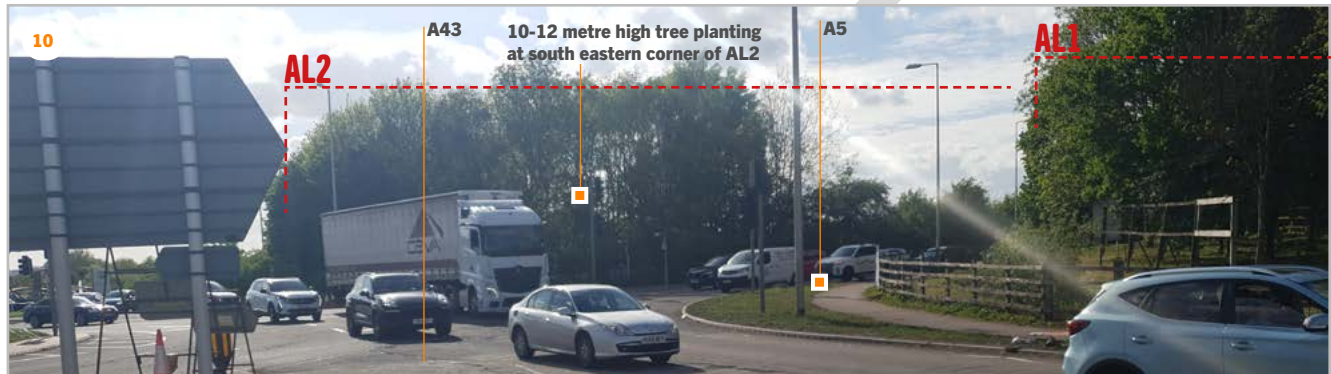




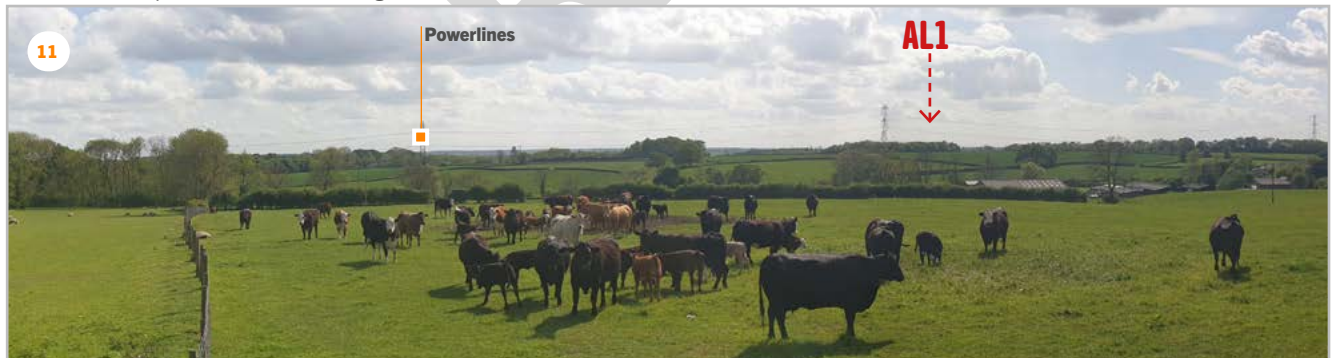
**Figure 40** Viewpoint 9 looking northeast from the A43/ Old Tiffield Road junction towards AL1, showing a gap in tree planting on the junction corner



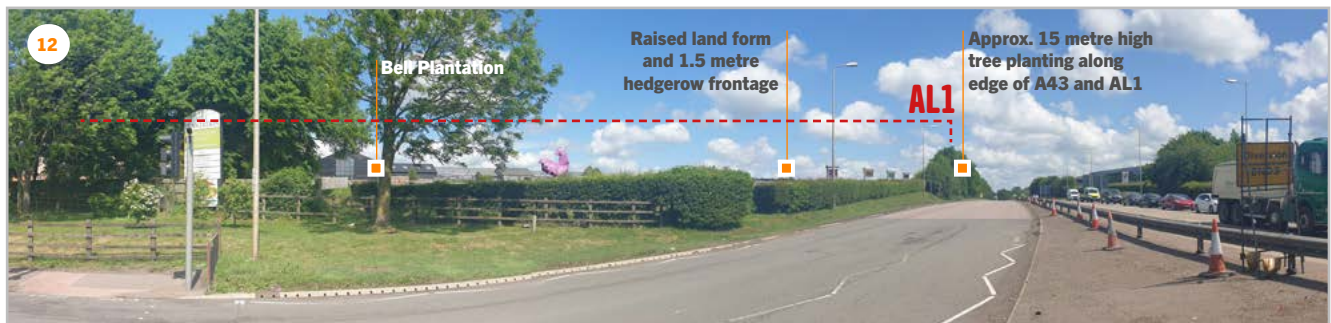
**Figure 41** Viewpoint 10 looking west from the pedestrian island crossing at Tove Roundabout towards the eastern corner of AL2



**Figure 42** Viewpoint 11 looking southwest from PRow SA2 across a shallow valley towards AL1, with an undulating patchwork of fields, blocks of woodland and a power line characterising the view towards the site



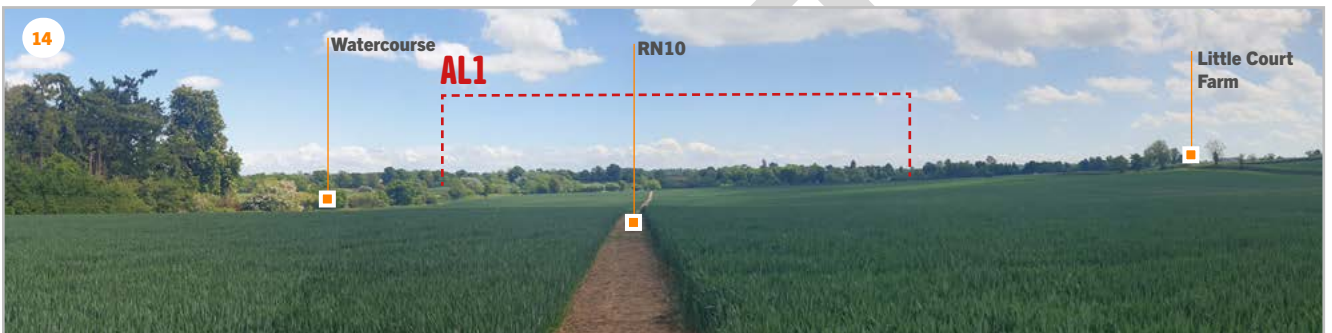
**Figure 43** Viewpoint 12 looking northeast from the central island at the pedestrian crossing at Tove Roundabout towards AL1's edge with the A43, showing the mix of hedgerow, grass verge and tree planting landscape treatment



**Figure 44** Viewpoint 13 looking west from PRow SB1 (within the north-western part of AL3) towards AL1, with views of the northern half of AL1 beyond field boundaries of shrub and tree planting as land form rises up to a local ridge line. An area of woodland planting around Brickyard Farm largely screens the southern half



**Figure 45** Viewpoint 14 looking southeast from PRow RN10 towards AL1, with glimpses through to the northern half of the site through planting along field boundaries, the A5 and a watercourse that leads down to the River Tove



**Figure 46** Viewpoint 15 looking north from the southern edge of Towcester Racecourse towards AL1 with existing woodland planting and rising land form defining the skyline beyond the sites



**Figure 47** Viewpoint 16 looking north west from the front of Easton Neston House showing how the front lawn and avenue of trees are aligned with views towards Greens Norton Church





## AL4 - Visual Summary

4.11 The landform around AL4 gently slopes westwards towards the A43 and beyond, down to the Silverstone Brook. The area is made up of medium to large fields, many of which are irregularly shaped in part due to the severance caused by the A43 and associated engineering works. There are limited key receptor points locally around the site with few footpaths in the immediate surrounds.

### Views from along A413

4.12 The A413 provides the key local corridor from where AL4 is visible. There are glimpses through to the site on its eastern edge at a roadside stopping point (vp1). The bridge over the A43 to the north west of the site offers a raised elevation of the site's western interface with the A43 corridor, a tree planted edge of approximately 12-15 metres currently screen the site from this location (vp7). Further south west along the A413 views are offered looking across the A43 towards the western edge of the site, above the planted roadside embankment (vp2).

### Views from the South, East and West

4.13 Further afield, due to AL4's siting on land rising in a north/north easterly direction from the Silverstone Brook there are a series of potential receptor locations from the south, east and west sensitive to future development. The following locations have been included to illustrate this potential sensitivity:

- from the south - several points along Whittlebury Road / Church Way, a road linking Silverstone to Whittlebury (vp3 & 4), and; along a bridleway (RX5) situated to the north of Silverstone Circuit (vp 9 & 12).
- from the east - beyond the A413 and along PRoW SB17 and SB31, which both run past the eastern edge of Burcote Wood (vp5 & 6).
- from the west - along PRoW RA13 and SB14, a footpath that runs between Silverstone and Park Farm (vp8); adjacent to where PRoW RA32 joins a country road that leads west along Church Street out of Silverstone (vp11), and; a point along PRoW RA15 to the west of a solar farm (vp10).

### Visual sensitivity AL4

There is a need for greater sensitivity in developing areas at the southern and eastern corners of the site due to the site's position on rising land making this part of the site particularly sensitive to receptors from the south and west

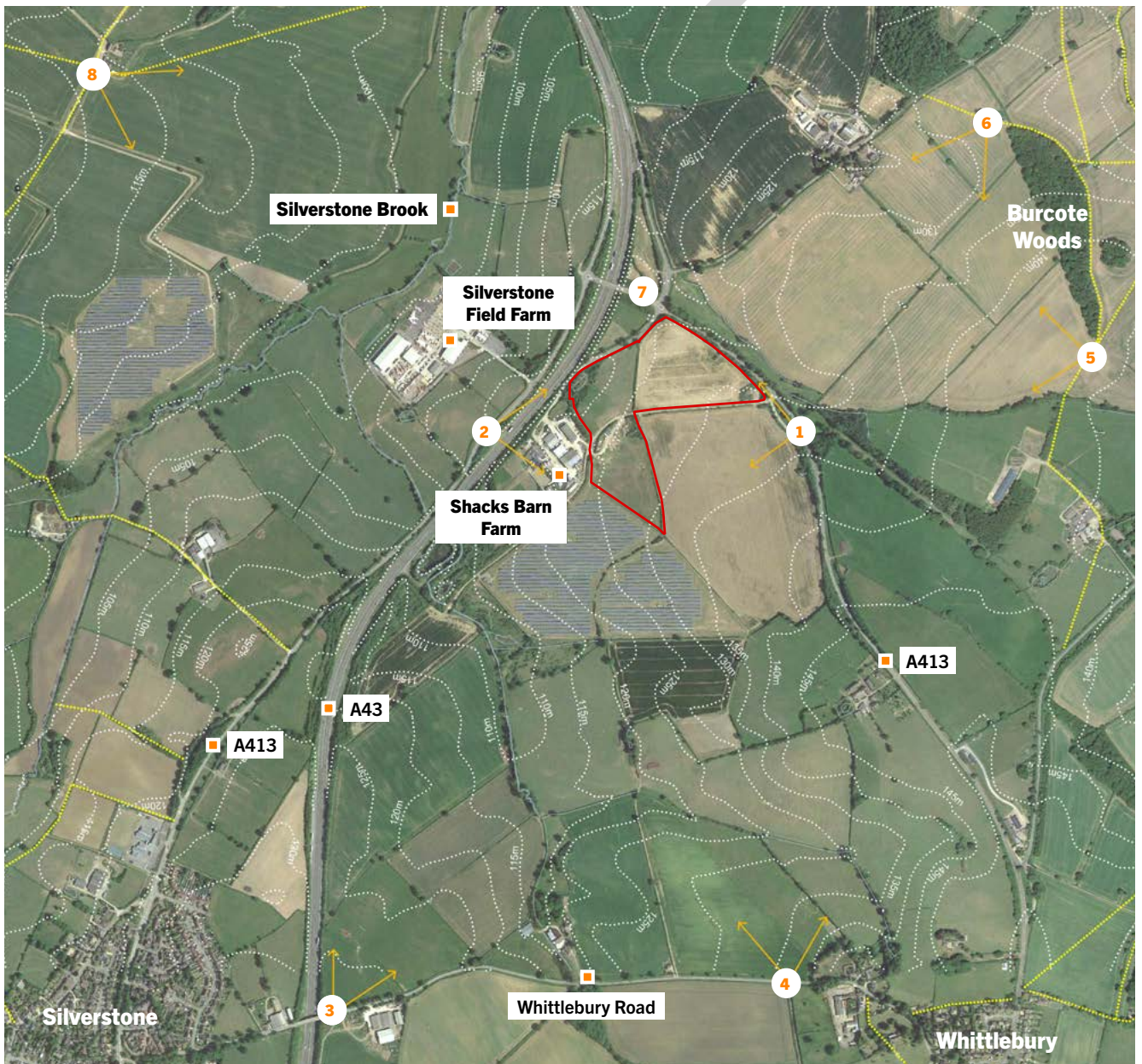


**Figure 49** Plan showing potential sensitive receptors for AL4 from the south and west, numbers are referenced in text on previous page and shown in photos over pages 52-55



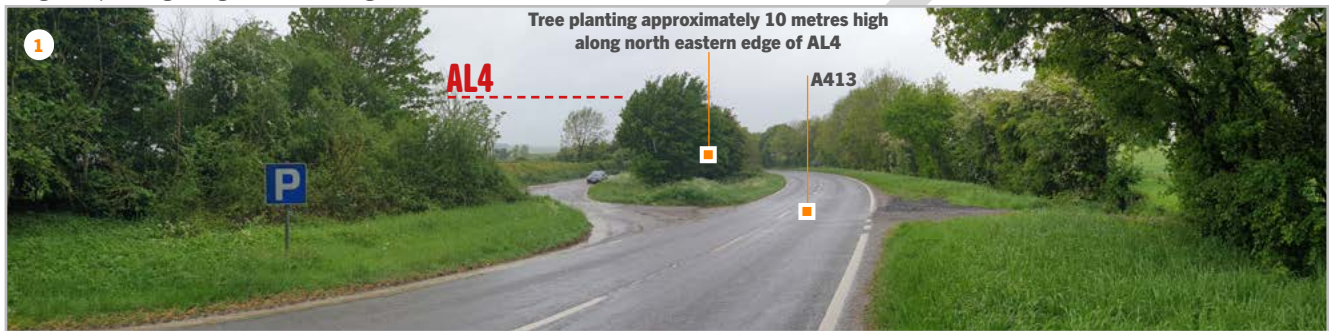
- Public Rights of Way (PRoW)
- Potential Sensitive Receptor
- Watercourse

**Figure 48** Plan showing potential sensitive receptors for AL4, numbers are referenced in text on previous page and shown in photos over pages 52-55

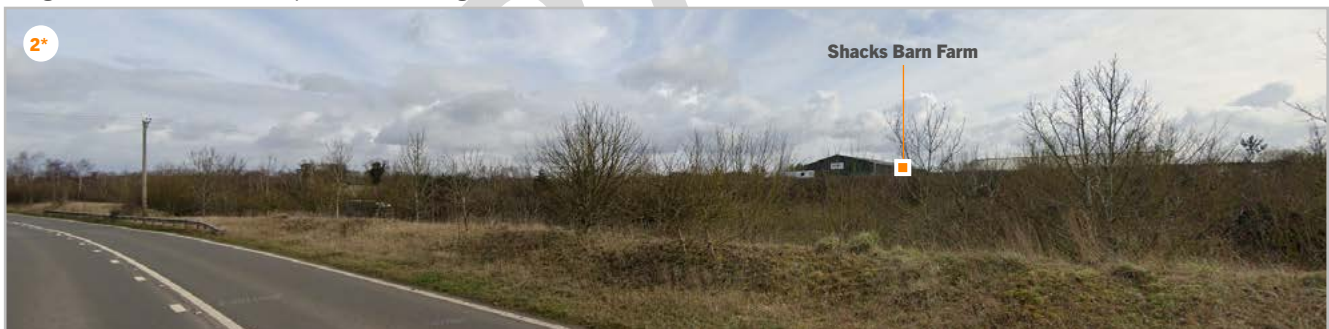




**Figure 50** Viewpoint 1 looking west from the A413 towards AL4, showing the break in roadside tree planting offering views through to low level hedgerow planting along the eastern edge of the site



**Figure 51** Viewpoint 2 looking east from A413 towards the western edge of the site over the A43, with units associated with Shacks Barn Farm rising above the level of landscape treatment along the A43



**Figure 52** Viewpoint 3 looking northeast from Whittlebury Road towards AL4, showing the site sitting just beyond a solar farm with Burcote Woods provided a tree lined skyline



**Figure 55** Viewpoint 4 looking north from Whittlebury Road towards AL4, with the site sitting beyond intermittent tree and hedgerow lined field boundaries and a solar farm



**Figure 53** Viewpoint 5 looking west from PRoW SB17 over an area of rising land form towards AL4



**Figure 54** Viewpoint 6 looking southwest from PRoW SB32 towards AL4, with the site sitting beyond intermittent tree lined field boundaries and a utility line





**Figure 56** Viewpoint 7 looking east from A413 as it cuts across the A43 towards the AL4, with the A43's tree planted embankment screening the site



**Figure 58** Viewpoint 8 approximately 1.5 km from AL4 looking east from a junction of three PRoW (SB14, SB26 and SB33), with the site visible on land rising up above Silverstone Field Farm and Shacks Barn Farm



**Figure 57** Viewpoint 9 approximately 2.5 km from AL4 looking north from PRoW RX5, with the site just visible above the solar farm on land rising up from Silverstone Brook



**Figure 59** Viewpoint 10 looking east from PRoW RA15 towards AL4, with the site visible on land that continues to rise up from Silverstone Brook to Burcote Wood



**Figure 60** Viewpoint 11 approximately 2.2 km from AL4 looking north from PRoW RA15, with the site and adjacent solar farm visible on land that continues to rise up from Silverstone Brook to Burcote Wood



**Figure 61** Viewpoint 12 approximately 2.5 km from AL4 looking north from a junction of four PRoW (RX2, RX5, RX6 and RX30), with a view of the site sitting just above the solar farm and east of units in Shacks Barn Farm





## AL5 - Visual Summary

4.14 The site slopes gently eastwards and southwards towards the River Great Ouse. Within the site there is a more localised drop with land sloping gently southwards and northwards to the Dogsmouth Brook, as it cuts east west through the site on course to feed into the River further east. Fields in the area range in size and are shaped by the many man-made and natural features that have cut through the area, including roads, watercourses and canals. There is an extensive network of PRoW as the area transitions from a sparsely populated agricultural & rural area in the west to an area of higher population and landscape managed more for ecology and recreation in the southeast, including Ouse Valley Parkland.

### A5 Approach

4.15 Views of the western edge of the site along the A5 start opening up approximately 100 metres to the north west of the A508 roundabout (vp1), becoming most prominent on the roundabout (vp2).

4.16 The site is well screened by roadside landscape and a raised embankment as the A5 continues east past Old Stratford. When the road passes over River Great Ouse foreground views of field in south eastern corner of site are offered, these being particularly significant for westbound traffic (vp3).

### Northampton / Stratford Road

4.17 The narrow carriageway and blocks of mature roadside planting mean there is limited inter visibility between the site and the Northampton Road. On entry into Cosgrove, adjacent to the village sign distant glimpses of the site do open up, these views are foregrounded by existing development (vp4). As the road rises and heads in a north easterly direction the roadside planting thins out offering intermittent views of the site's northern field. There is approximately a 50 metre stretch, adjacent to agricultural access to this field where the site, which sits directly next to the roadside is fully visible (vp5).

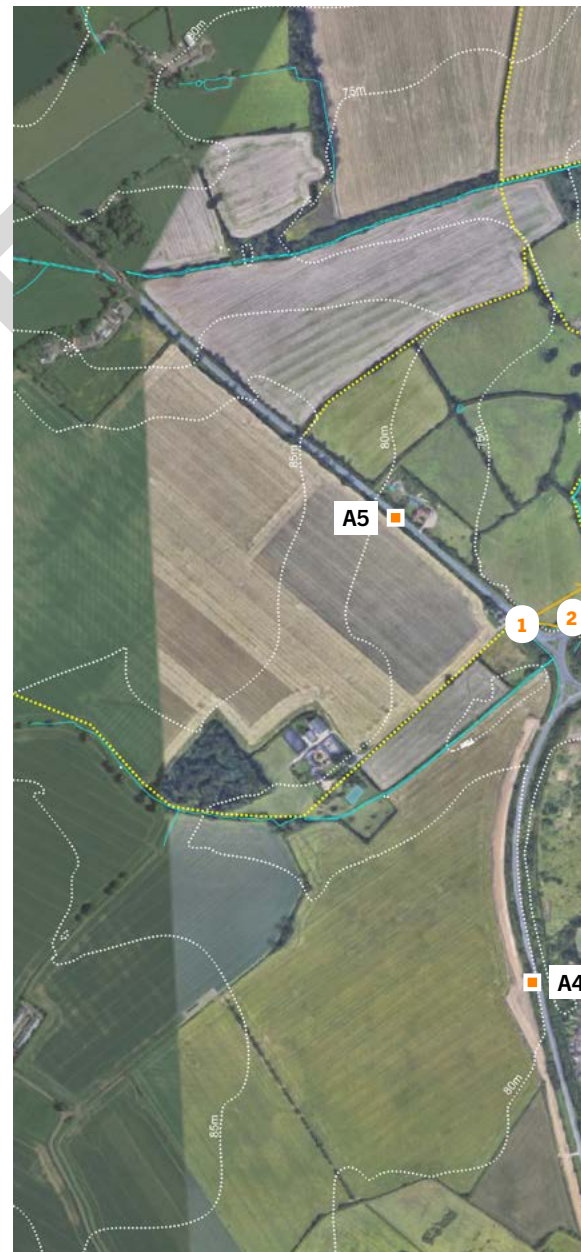
4.18 Traveling south west along Stratford Road from Cosgrove roadside planting is limited, however medium to long distance views of the site are filtered by field boundary planting along the north eastern edge of the site (vp6).

### A508/A422

4.19 Heading south along the A508 roadside planting provides a substantial screening to the site up until the roundabout where screening thins out and views of the site are on offer immediately to the east.

4.20 Views of the site heading north on the A422 are obscured by the roundabout's central mound and / or viewed within the context of a Travelodge, which fronting onto the roundabout.

Figure 62 Plan showing potential sensitive receptors for AL5, numbers are referenced in text on this page and shown in photos over pages 58-59



- Conservation Area
- Public Rights of Way (PRoW)
- Potential Sensitive Receptor
- Watercourse





**Visual sensitivity AL5**

There are clear restrictions to developing in the eastern part of the site due to this area's sensitivity to receptors along the A5 and proximity to the Ouse Valley Park. Greater sensitivity needs to also be taken in developing areas along the northern and central parts of the site due to rising topography making these parts of the site particularly sensitive to views from the A5 and from the north and north east, along Stratford Road.



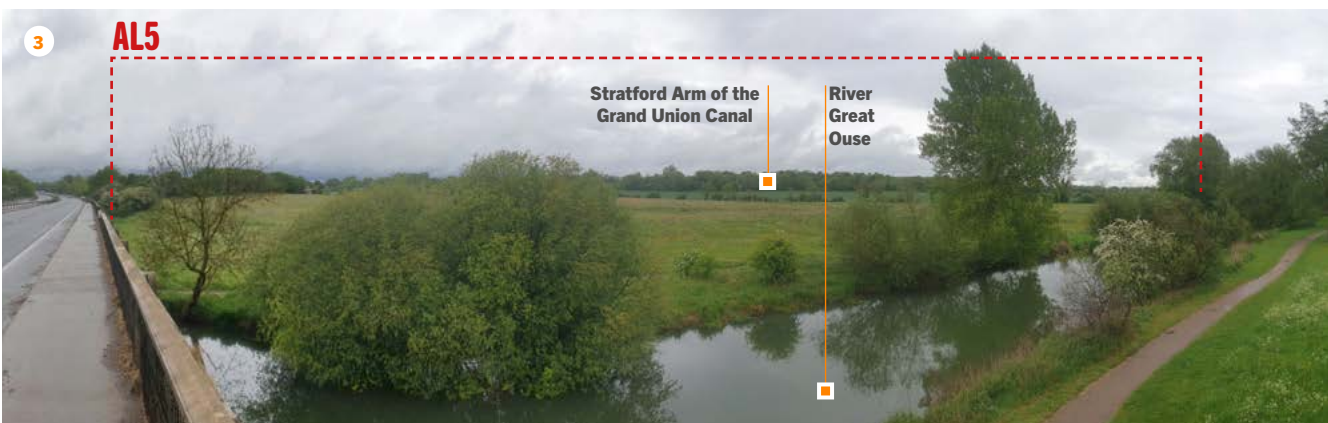
**Figure 63** Viewpoint 1 looking east travelling south along the A5 just before Old Stratford Roundabout with a view of the western end of AL5 looking over foreground paraphernalia associated with the roundabout



**Figure 64** Viewpoint 2 looking east from Old Stratford Road towards AL5 with a break in tree plant on the corner of the roundabout offering views into the site



**Figure 65** Viewpoint 3 looking north across the eastern end of the AL5 from an elevated perspective with the River Great Ouse and Valley Parkland in the foreground





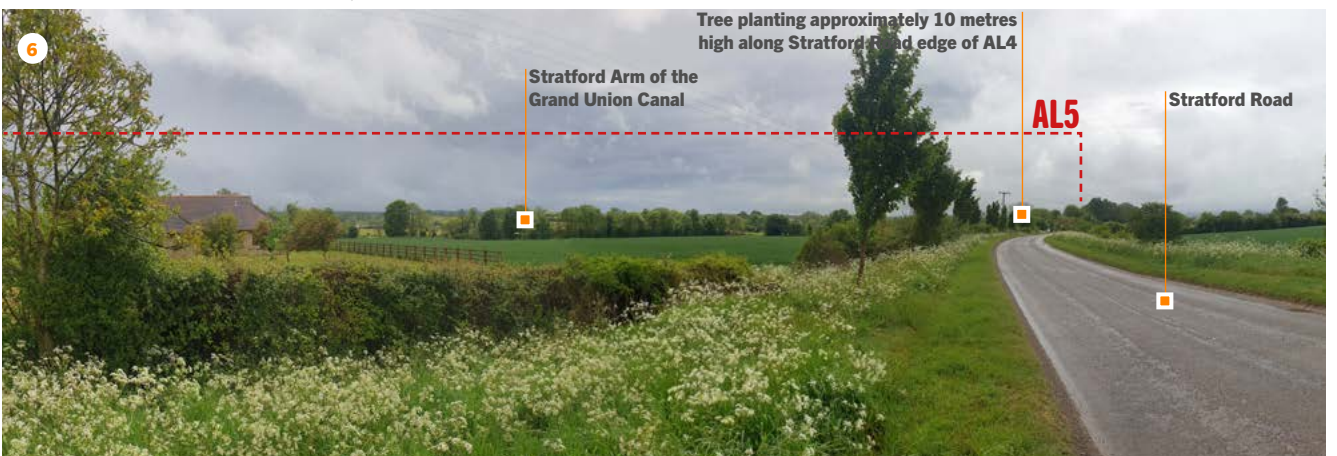
**Figure 66** Viewpoint 4 looking south from Northampton Road towards the site screened/contextualised by foreground buildings and landscape along the local Brook & field boundaries



**Figure 67** Viewpoint 5 looking southwest from Stratford Road across AL5 with views across a relatively flat field towards an existing industrial unit and tree planting along the Stratford Arm creating a certain level of screening from the south east/Ouse Valley Parkland



**Figure 68** Viewpoint 6 looking southwest from Stratford Road towards AL5 with the relative flat land form and tree lined boundaries of the road, Stratford Arm fields breaking up views







# Design Principles

# 5

## 5. Overarching Design Principles

This section outlines a series of non-spatial overarching design principles that clearly express the need for a design-led approach to each of the four employment sites without dictating the form of that development.

5.1 The form and layout of employment development is dependent on various factors, such as the needs of the user and market conditions. It is therefore not possible to be overly prescriptive about design, allowing for a level of flexibility.

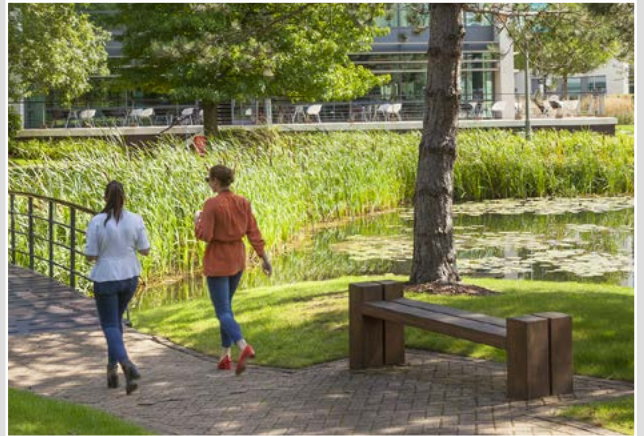
5.2 These principles should be reflected in any development proposed for the four employment sites.

5.3 New development for each of the four employment sites should:

- Support Local Plan policy to deliver high quality development that is respectful of its setting.
- Ensure that development platforms are created to reduce the impact of the scale and massing of buildings on local character and the setting of the site, either in response to the height and/or the long and uniform ridge lines they may introduce.
- Seek to minimise any visual impact through measures such as landscape screening and elevational treatment.
- Ensure high quality building design (including the use of material, colour palette, and/or architectural articulations) and landscape design across the site, particularly where there is a need to reduce the impact of a building's height.
- Recognise and enhance existing landscape features and planting, where possible using traditional field patterns and woodlands as structural elements.
- Ensure any new public realm is designed to a comfortable and welcoming human-scale, with a material palette used to create an attractive local character.
- Where possible contribute to the area's wider green network, including recognising and retaining important wildlife habitats/habitat corridors, enhancing these to contribute to overall biodiversity net gain.
- Use footpath, cycle, and road networks to support and encourage sustainable travel to and around the site.

- Provide a sensitive response to any Heritage assets and their settings, where possible using them as design inspiration.
- Ensure the council and public transport operators are consulted to help explore opportunities for funding public transport improvements, including frequency and access to services for future employees.
- Seek opportunities to address the existing road network in a positive manner, be that through new active building frontage and decorative planting or the retention and enhancement of existing native planted boundaries/edges.
- Seek to visually break up new areas of parking with planting, permeable material and SUDs features such as dry or wet swales, allowing the absorption and channelling of surface water.
- Ensure the layout of each development incorporates the principles of Secured by Design, thereby minimising the opportunities for crime and creating a sustainable development.
- Look to integrate movement networks with blue & green infrastructure by locating new or retained tree planting/hedgerow and SUDs provision along new roads.
- Limit the impacts on the tranquillity of each site's rural setting, ensure that robust proposals are set out during the planning application process to minimise/mitigate any light, noise & air pollution or visual clutter (i.e.. advertising) resulting from the future operation of new buildings, where relevant.









# Assessment & Evaluation

6

## 6. Assessment and Evaluation

This section includes a series of development frameworks that illustrate spatial parameters for each of the sites. These seek to avoid a prescriptive, one-size-fits-all approach and are based on individual site assessments, included in this section and the **contextual considerations (section 3)** and **landscape & visual Assessment (section 4)**. These site assessments and frameworks are not intended to be exhaustive, as such further assessment and design work will need to be undertaken at planning application stage to best shape a proposal for each of the sites.

### Site AL1 Assessment

High-level site assessment work has been undertaken using a combination of desk-based and site visit work. A range of key considerations have been identified from a contextual to site specific scale.

#### Surrounding Land Use & Scale

6.1 A cluster of uses, referred to as Bell Plantation are situated within the south western corner of the site, uses include garden centre, nursery, vet and play centre. Buildings are relatively small in scale, ranging from 4-10 metres in height.

6.2 Brickyard Farm, including farmhouse and ancillary buildings is situated on the eastern edge of the site. A complex of buildings, referred to as Bairstows Lodges are situated along the A5 to the west of the site.

6.3 There are a number of office, retail, light industrial and distribution uses situated around Tove Roundabout, refer to section 3 for further details.

#### Landscape

6.4 The northern half of the site comprises a single field while the southern half comprising two fields and Bell Plantation.

6.5 There are several blocks/belts of woodland within/adjacent to the site with an east west belt of woodland leading from its western edge to its centre, a block of woodland is located to the north of Brickyard Farm, and surrounding Bairstows Lodge.

6.6 Intermittent tree planting runs along the north eastern, north western, south western and southern boundaries

of the site. The scale of tree belts vary but more substantial mature tree belts are approximately 20 metres in height.

#### Topography

6.7 A central ridge line runs north south about halfway through the centre of the site.

6.8 The northern half of the site primarily slopes westwards from this ridge line, gently dropping approximately 5 metres to its western/A5 edge.

6.9 The southern half of the site slopes from the ridge line in a south western, southern and south-eastern direction, dropping between 5-10 metres.

#### Views & Visual Sensitivity

6.10 There is a need for greater sensitivity in developing the site due to the rising topography to the north and rural character, considering sensitive receptors from the north, east and west from several PRoWs and country roads.

#### Access & Movement

6.11 There is a continuous, at grade frontage of approximately 650 metres onto the A5 along the western edge of the site, this excludes the Bell Plantation frontage (approximately 300 metres).

6.12 PRoW SB1 runs along the north eastern edge of the site for approximately 400 metres, while a potential link into

the south-eastern corner of the site is provided from PRoW SB52, situated along Old Tiffield Road.

6.13 A continuous footpath runs along the A5 into the centre of Towcester joined onto by PRoW SB7, that connects west to Duncote.

#### Ecology

6.14 No ecological surveys have been undertaken. Any planning application should be supported by relevant ecological survey work.

#### Heritage

6.15 AL1 is situated approximately 550 metres from the north western boundary of the Easton Neston House Conservation Area and Historic Park and Garden, with the A43, housing and employment development situated between it and the protected estate.

6.16 Towcester Conservation Area, including a clustering of listed buildings is approximately 700 metres south of the site.

6.17 There are two grade II listed buildings at the southern end of Caldecote approximately 300 metres north of the site.













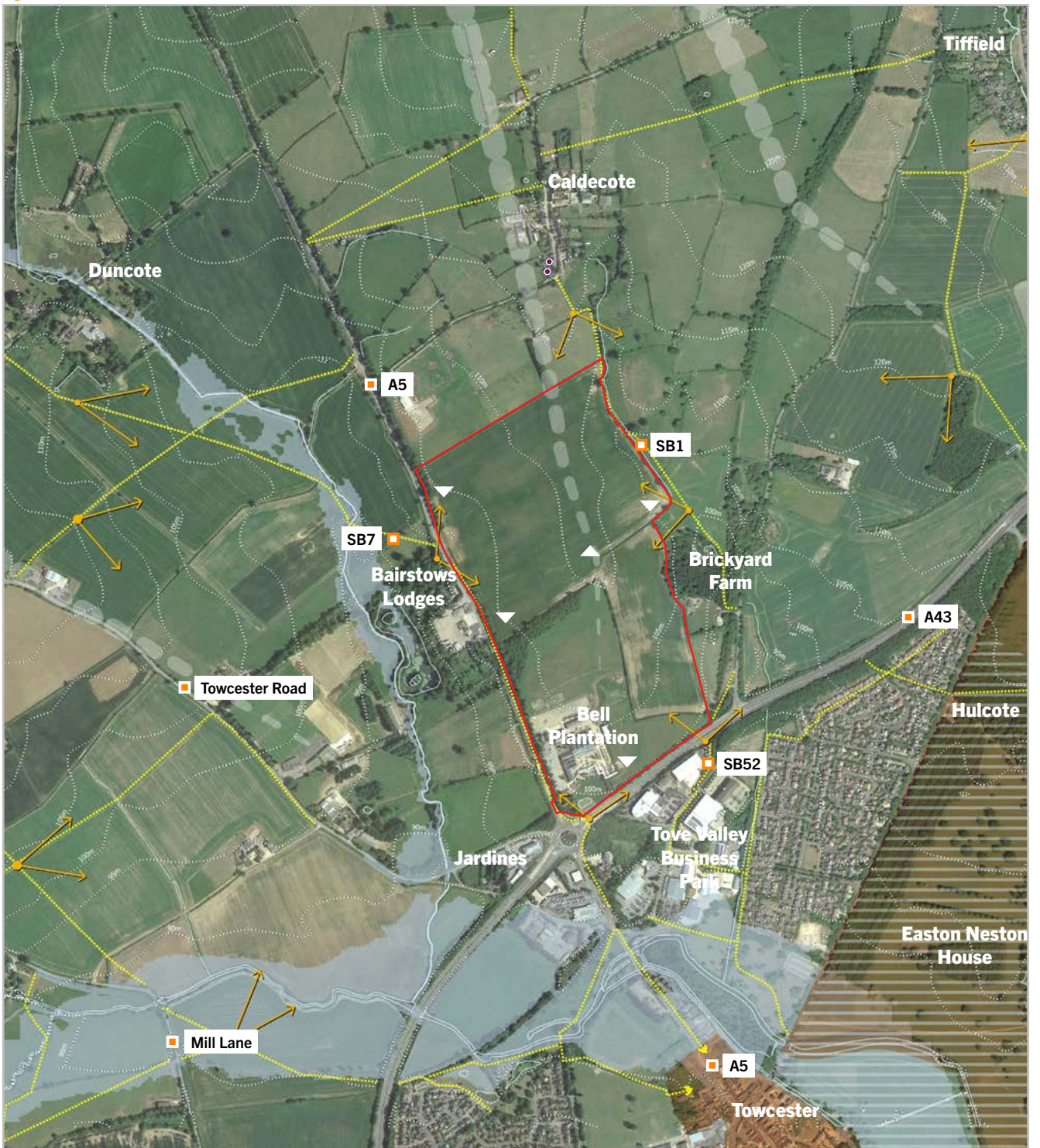
- |  |  |
|--|--|
|  Flood Plain Area   |  High Point                   |
|  Easton Neston House (Parks and Gardens Register/Conservation Area) |  Low Point                    |
|  Towcester Conservation Area  |  PRow                         |
|  Listed Building  |  Potential Sensitive Receptor |
|  |  Watercourse                  |
|  |  Ridge line                   |

Figure 69 AL1 site assessment



## Site AL1 Development Framework

The development framework for AL1 establishes key parameters and principles.

### Access & Movement

6.18 The development framework AL1 provides a number of key access points into the site off the A5. These include an access located to the immediate north of the Bell Plantation and an access half way along the northern field boundary. New link roads to lead off these access points to utilise all parts of the development areas, including an access to any sports pitches.

6.19 The development framework AL1 includes new east west active travel routes that link the A5 footpath with PRoW SB1. Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of a lighting plan and consistent use of wayfinding/signage should be considered.

### Drainage

6.20 The development framework AL1 sets out an integrated and attractive sustainable drainage network with swales located along woodland edges, the site's A43 frontage and a central green link, directing and filtering surface water to a series of basins located on the site's periphery. The network should explore any opportunity to add ecological and amenity value to the development, such as through the introduction of rain gardens & permeable surfacing within hard surface areas & along key vehicular and active travel routes. Ultimately the location of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.

### Green Infrastructure

6.21 The development framework AL1 proposes green infrastructure that comprises a series of enhanced and new edges/belts of woodland/hedgerow planting and areas of green space. New substantial landscape edges/buffers, with tree planting are shown as a requirement along the northern, eastern and western perimeter to help mitigate visual impact of any new buildings.

6.22 A green link helps separate development in the northern and southern halves of the site, cutting east west across it. This link could comprise an active travel route and a SUDs basin situated within one of the areas of green space. An existing belt of juvenile woodland could be removed to ensure the link is overlooked by new buildings, enhancing its safety and accessibility.

6.23 The southern half of the site is broken up by a series of narrower belts of landscape, these run north south separating new development from land earmarked for Towcester Football Club (TFC). The siting of TFC's pitches is not currently defined in policy, as such these could be accommodated in an alternative location if justified.

6.24 The southern end of the site accommodates the key area of green space within the framework, potentially incorporating a SUDs basin.

### Building Height, Scale and Massing

6.25 Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 16m in height (from existing ground levels), and being effectively screened from sensitive views by either existing or proposed tree planting. Large buildings, which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering the highest design quality and a thorough programme of landscape measures.

### Placemaking / Urban Form

6.26 The development framework AL1 suggests a series of key frontage opportunities across areas of new development, including along both the central green link / SUDs parkland, the A43, mirroring frontage on the southern side of the road, and the A5 adjacent to an access to the northern area of development. These frontages would require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building facade can be created.



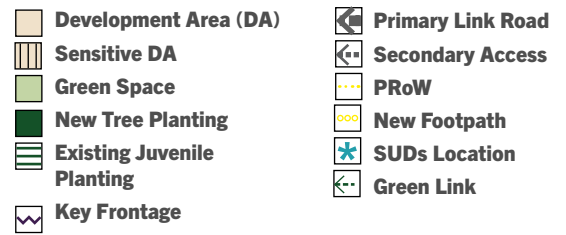


Figure 70 AL1 development framework



**Key Features**

- 1** Northern development area
- 2** Southern Development Area
- 3** Sensitive development area along northern and north eastern site edge
- 4** Towcester Football Club Sports pitches (6 hectares)
- 5** New A43 Corridor frontage
- 6** East West Green Link with key frontage treatment and active travel link
- 7** Access off A5 to both employment land and sports pitches
- 8** East-west footpath link between existing paths
- 9** Enhanced woodland edge treatment
- 10** Enhanced planted A5 frontage

## Site AL2 Assessment

High-level site assessment work has been undertaken using a combination of desk-based and site visit work. A range of key considerations have been identified from a contextual to site specific scale.

### Surrounding Land Use & Scale

6.27 A cluster of uses, referred to as Bell Plantation is situated to the east of AL2 and the A5. Land uses include garden centre, nursery, vet and play centre. Buildings are relatively small in scale, ranging from 4-10 metres in height.

6.28 Jardines, a car forecourt is located to the south of AL2 and Towcester Road. The building associated with this use is below road level, rising to approximately 8 metres in height.

6.29 Linden Barn Food Shop, Towcestrians Sports Club and a series of agricultural buildings sit to the west of AL2, along or just off Towcester Road. The food shop sits approximately 200 metres west of the site and comprises a series of 5-7 metre high buildings. The sports club sits approximately 250 metres to the north west of the site and comprises a single 1,000m<sup>2</sup> building, approximately 6 metres high surrounded by sports facilities, including tennis courts and sports pitches.

6.30 There are a number of office, retail, light industrial and distribution uses situated around Tove Roundabout, refer to section 3 for further details.

### Landscape

6.31 AL2 is bound by a substantial belt of woodland along its western edge, this boundary follows a watercourse that feeds south into the River Tove. Hedge and low-level tree planting provides a thin planted roadside edge to the eastern

and southern boundaries of the site, while the northern countryside edge includes a fence line with intermittent hedgerow planting.

6.32 The south eastern corner of the site is planted with semi-mature trees, which are approximately 10-12 metres in height. This structured planting is likely to have been introduced as part of works associated with Tove Roundabout and provides an element of visual screening.

### Topography

6.33 AL2 gently slopes by approximately 8 metres from its eastern A5 edge to its western edge, which is defined by a watercourse.

### Flooding

6.34 Along the western edge of the site flood zones 2 and 3 follows the watercourse. Zone 3 is contained within the watercourse itself with zone 2 spreading no further than 10 metres into the south western corner of the site.

### Views & Visual Sensitivity

6.35 There is a need for greater sensitivity in accommodating new development within the north eastern and the southern area of the site due to views offered when approaching south along the A5 & west along the A43 and the site's location on a viewing corridor between Easton Neston House & Greens Norton Church.

### Access & Movement

6.36 There is a continuous, at grade frontage of approximately 120 metres onto the A5, along the eastern edge of the site. There is a continuous, at grade frontage of approximately 180 metres onto Towcester Road, along the southern edge of the site.

6.37 A footpath runs along the eastern edge of the A5, providing a continuous footpath that links into the centre of Towcester. There are no footpaths currently along Towcester Road.

### Ecology

6.38 No ecological surveys have been undertaken. Any planning application should be supported by relevant ecological survey work.

### Heritage

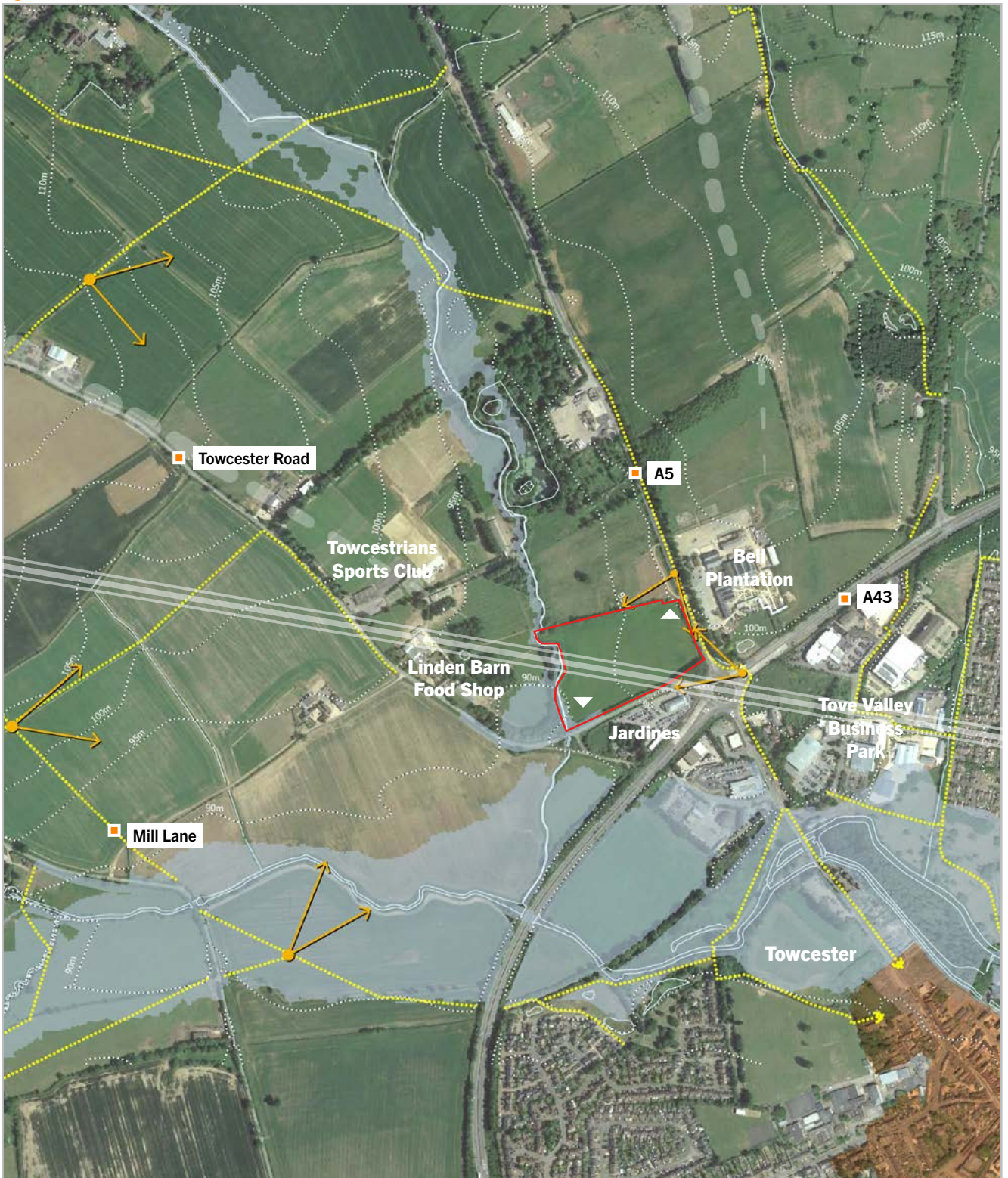
6.39 AL2 is roughly 1km west of the boundary of the Registered Park and Garden/Conservation Area of Easton Neston House, with the A43, housing and employment development situated between it and the protected estate. AL2 sits on the alignment of a tree-lined avenue in front of the House, this once provided a visual link from the House to the church in Greens Norton. Although any relationship is largely severed by intervening development future proposals for AL2 should consider views along this alignment when preparing the arrangement, height and massing of any built form.

6.40 Towcester Conservation Area, including a clustering of listed buildings is approximately 700 metres south of the site.



- Flood Plain Area
- Towcester Conservation Area
- Viewing Corridor between Easton Neston House & Greens Norton Church
- High Point
- Low Point
- Footpath (incl. PRoW)
- Potential Sensitive Receptor
- Watercourse
- Ridge line

Figure 71 AL2 site assessment



## Site AL2 Development Framework

The development framework for AL2 establishes key parameters and principles.

### Access & Movement

6.41 The development framework AL2 provides a key access point into the site off Towcester Road / Greens Norton Road, from the south. The access is to be sited at least 100 metres from Tove Roundabout.

6.42 Active travel provision to the site is currently provided along the existing footpath on the A5. In addition to ensuring safe, comfortable and direct connection to this path for pedestrians any development should also explore providing a new pedestrian connection to Tove Roundabout from along Towcester Road.

6.43 Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of a lighting plan and consistent use of wayfinding/signage should be considered.

### Drainage

6.44 The development framework AL2 sets out an integrated and attractive sustainable drainage network with swales located along green and woodland edges directing and filtering surface water to a basin located on the site's periphery. The network should explore any opportunity to add ecological and amenity value to the development, such as through the introduction of rain gardens & permeable surfacing within hard surface areas & along key vehicular and active travel

routes. Ultimately the location of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.

### Green Infrastructure

6.45 The development framework AL2 proposes introducing new tree planting to reinforce the northern, eastern and southern edges of any new development. These will link up to the existing tree-lined watercourse along the western edge of the site and extensive belt of tree planting along Towcester Road.

6.46 In addition the development framework AL2 shows the inclusion of green space along the edges of any development with a larger green space at the south western corner, incorporating a SUDs basin. These will allow for any development to be setback from the enhanced planted boundary treatments.

### Height, Scale and Massing

6.47 Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 10-12 metres in height (from existing ground levels), and being effectively screened from sensitive views by either existing or proposed tree planting. The site's size and proximity to development of a moderate scale adjacent to the Tove Roundabout is likely to prohibit Large buildings, which have a greater impact i.e. are visible above tree cover / from longer distances or

affect the character of the area in which they sit. These will only be considered in exceptional circumstances if acceptable mitigation is provided such as delivering the highest design quality and thorough programme of landscape measures.

### Placemaking / Urban Form

6.48 The development framework AL2 suggests a key frontage opportunity onto the Tove Roundabout and along Towcester Road. These frontages would require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building facade can be created.

6.49 New development should seek to address stretches of the site's A5 & Towcester Road frontage wherever possible. Potentially providing a bolder form and scale onto these roads with building orientation & treatment and landscape proposals helping to contribute a new gateway frontage into Towcester.



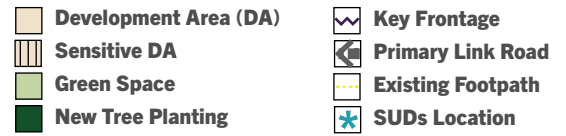


Figure 72 AL2 development framework



**Key Features**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>1 Development area</li> <li>2 New SUDs pocket park</li> <li>3 Key gateway frontage along the A5 and Towcester Road</li> <li>4 Access off Towcester Road</li> <li>5 Substantial northern woodland edge treatment</li> </ul> | <ul style="list-style-type: none"> <li>6 Enhanced planting along sections of Towcester Road and A5 edges</li> <li>7 Open space edge integrated with adjacent watercourse</li> <li>8 Sensitive viewing corridor with any development to avoid impacting view between Easton Neston House and Greens Norton Church</li> </ul> |
|---|---|

## Site AL4 Assessment

High-level site assessment work has been undertaken using a combination of desk-based and site visit work. A range of key considerations have been identified from a contextual to site specific scale.

### Surrounding Land Use & Scale

6.50 Shacks Barn Farm is situated on the western edge of AL4, it and Silverstone Field Farm are detailed further in section 3.

### Landscape

6.51 AL4 comprises three irregularly shaped fields, whose shape has, in part been caused by the development of adjoining infrastructure.

6.52 Its boundary with the A413 is a mix of hedgerow and semi-mature tree planting, which forms a roadside landscape edge of approximately 10 metres in height. Its western edge, along the access route to the Shacks Barn Farm and around the edge of the farm is defined by a broad hedgerow and block of woodland planting that surrounds a pond feature.

6.53 Hedgerow field boundaries define the remaining edges and cut across the centre of the site. A small block of tree planting is situated centrally within AL4.

### Topography

6.54 The site gently slopes in a westerly direction, dropping approximately 10 metres to a local pond feature just within AL4's western edge.

### Views & Visual Sensitivity

6.55 There is a need for greater sensitivity in developing areas at the southern and eastern corners of the site due to the site's position on rising land making this part of the site particularly sensitive to receptors from the south and west.

### Access & Movement

6.56 The A413 provides a continuous, at grade frontage of approximately 320 metres along the north eastern edge of the site. Existing tracks run along the north-western edge and through the centre of the site, providing access to Shacks Barn Farm.

6.57 There are currently no footpaths within the vicinity of AL4.

### Ecology

6.58 No ecological surveys have been undertaken. Any planning application should be supported by relevant ecological survey work.

### Heritage

6.59 AL4 is situated approximately 800 metres from Lordsfield Farm Moat, a Scheduled Ancient Monument.





Figure 73 AL4 site assessment

- Scheduled Ancient Monument
- High Point
- Low Point
- Footpaths
- Potential Sensitive Receptor
- Watercourse



## Site AL4 Development Framework

The development framework for AL4 establishes key parameters and principles.

### Access & Movement

6.60 The development framework AL4 provides an access point into AL4 off the existing access road to Shacks Barn Farm. A new link road then links south and east into two development areas.

### Drainage

6.61 The development framework AL4 sets out an integrated and attractive sustainable drainage network with swales located along green and woodland edges directing and filtering surface water to a series of basins located on the site's periphery. The network should explore any opportunity to add ecological and amenity value to the development, such as through the introduction of rain gardens & permeable surfacing within hard surface areas & along key vehicular and active travel routes. Ultimately the location of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.

### Green Infrastructure

6.62 The development framework AL4 introduces belts of woodland and hedgerow planting, primarily enhancing existing field boundaries in and along

the edge of the site. The most substantial planting shall be sited along the southern edge of the two development areas, helping to mitigate the visual impact of development from the south. Where this planting abuts the solar farm its height and location will need to avoid overshadowing any solar panels. A continuous green edge will be introduced along the A413 reinforcing the existing tree and hedgerow planting.

6.63 A potential central belt of green space and planting could cut north south through the site separating two areas of development.

6.64 The SUDs basin, block of woodland and pond feature will be setback from development by an area of green space.

### Height, Scale and Massing

6.65 The appropriate scale of buildings on AL4 is likely to be small to medium due to its topography, irregular shape and proximity to Silverstone Business Park, an area with small to medium units. This may see development rise to approximately 10-15 metres in height, from existing ground levels. The site's capacity to accommodate large units is

further limited by restricted access onto the A43, with no direct southbound slip road access onto the A43 - alternative southbound access is provided via Silverstone.

6.66 Large units, which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit, will only be considered in exceptional circumstances if acceptable mitigation is provided such as delivering the highest design quality and thorough programme of landscape measures.

### Placemaking / Urban Form

6.67 The development framework AL4 suggests a key frontage onto the central belt of planting/green space and northern access road. This frontage would require a considered approach to building orientation, materiality and massing. Ensuring the introduction of an attractive, particularly when viewed from a distance heading northbound along the A413 and, where possible, active building facade.



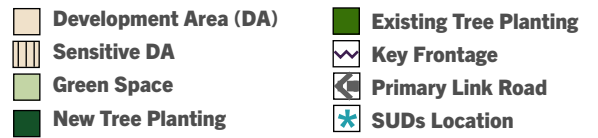
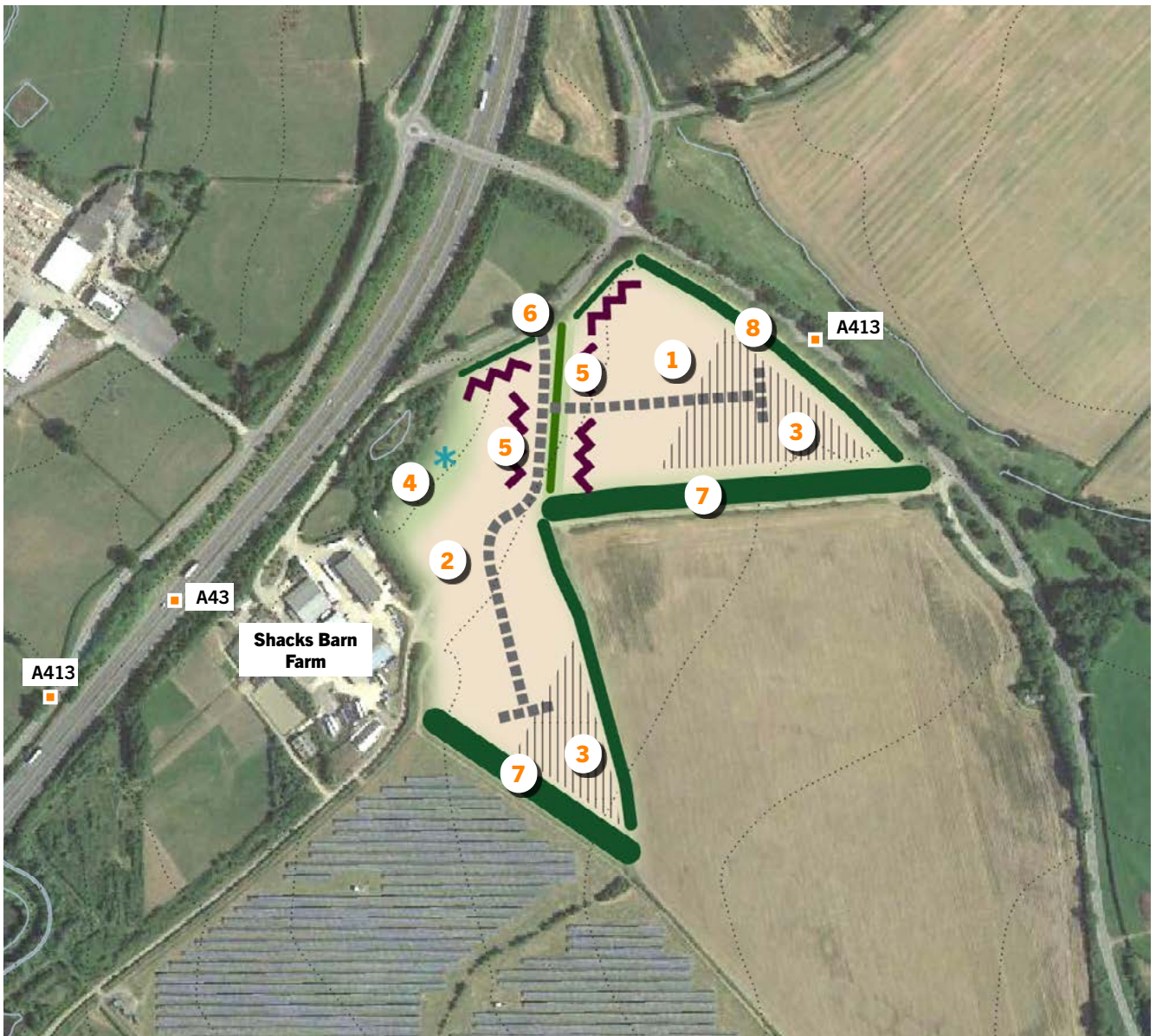


Figure 74 AL4 development framework



**Key Features**

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>1 Eastern Development area</li> <li>2 Western Development Area</li> <li>3 Sensitive development area at eastern and southern ends of site</li> <li>4 New SUDs green space</li> </ul> | <ul style="list-style-type: none"> <li>5 Key frontage onto central belt of planting</li> <li>6 Access off existing road to Shacks Barn Farm</li> <li>7 Enhanced southern woodland edge treatment, height considered in relation to potential impact on adjacent solar farm</li> <li>8 Enhanced planting along A413 edge</li> </ul> |
|---|--|

## Site AL5 Assessment

High-level site assessment work has been undertaken using a combination of desk-based and site visit work. A range of key considerations have been identified from a contextual to site specific scale.

### Surrounding Land Use & Scale

6.68 Along the southern edge of the site is a storage/distribution unit, at about 10-12 metres high this sits next to the A5 at the end of Cosgrove Road.

6.69 There are a mix of uses fronting onto/adjacent to the Old Stratford Roundabout with Travelodge, a car forecourt, offices, gym, restaurant and area of new housing. These buildings range in height from 6 to 10 metres.

6.70 Detached residential properties and small workshop units are strung along the Northampton/Stratford Road to the north of the site.

### Landscape

6.71 Site is made up of irregularly shaped arable fields bound by a mix of riparian, shrub and semi-mature tree planting.

6.72 Substantial belts and clusters of tree planting run along the Stratford Arm of the Grand Union Canal, along the western edge of the site's eastern most field and to the north of the site & along Stratford Road. The latter has intermittent tree planting adjacent to the site at heights of approximately 10 metres above existing site levels.

6.73 More structural planting is situated along the key roadside boundaries, particularly the A5 where an embankment separates the road from the site with tree planting approximately 10-15 metres above existing site levels.

### Topography

6.74 The site gently slopes down to the Dogsmouth Brook at 65-70m AOD

as it passes through the site east west, firstly along its north western edge and then through its centre. This represents a 12 metre drop from a high of 80m AOD in the northern half of the site and a 7 metre drop from a high of 75m AOD in the south half of the site.

6.75 Artificial land form changes are evident at the A5, which has been cut through the landscape leaving an embankment along the site's southern edge.

### Flooding

6.76 Flood zone 2 and 3 closely follows the routing of Dogsmouth Brook through the site, with the former expanding out in the centre of the site. The flood risk extends eastwards to follow the Ouse Great River, which flows to the east and south of the site.

### Views & Visual Sensitivity

6.77 There are clear restrictions to developing in the eastern part of the site due to this area's sensitivity to receptors along the A5 and proximity to the Ouse Valley Park. Greater sensitivity needs to also be taken in developing areas along the northern and central parts of the site due to rising topography making these parts of the site particularly sensitive to views from the A5 and from the north and north east, along Stratford Road.

### Access & Movement

6.78 There is a continuous frontage onto the A508 of approximately 400 metres, the majority of which is continuous and at grade along AL5's western boundary.

6.79 There is an existing network of paths that link west, under the A508, south east, under A5 to Ouse Valley Park/Old Stratford (PRoW RS16 & 17) and east to Cosgrove along the Grand Union Canal (PRoW RG6 & 9).

### Ecology

6.80 No ecological surveys have been undertaken. Any planning application should be supported by relevant ecological survey work.

### Heritage

6.81 The Stratford arm of the Grand Union Canal is a Conservation Area and cuts through the centre of the site. Reference should be made to the Conservation Area appraisal to inform any treatment of this area. There is another conservation area that extends south from Cosgrove, sitting approximately 300 metres to the north east of the site along Stratford Road.

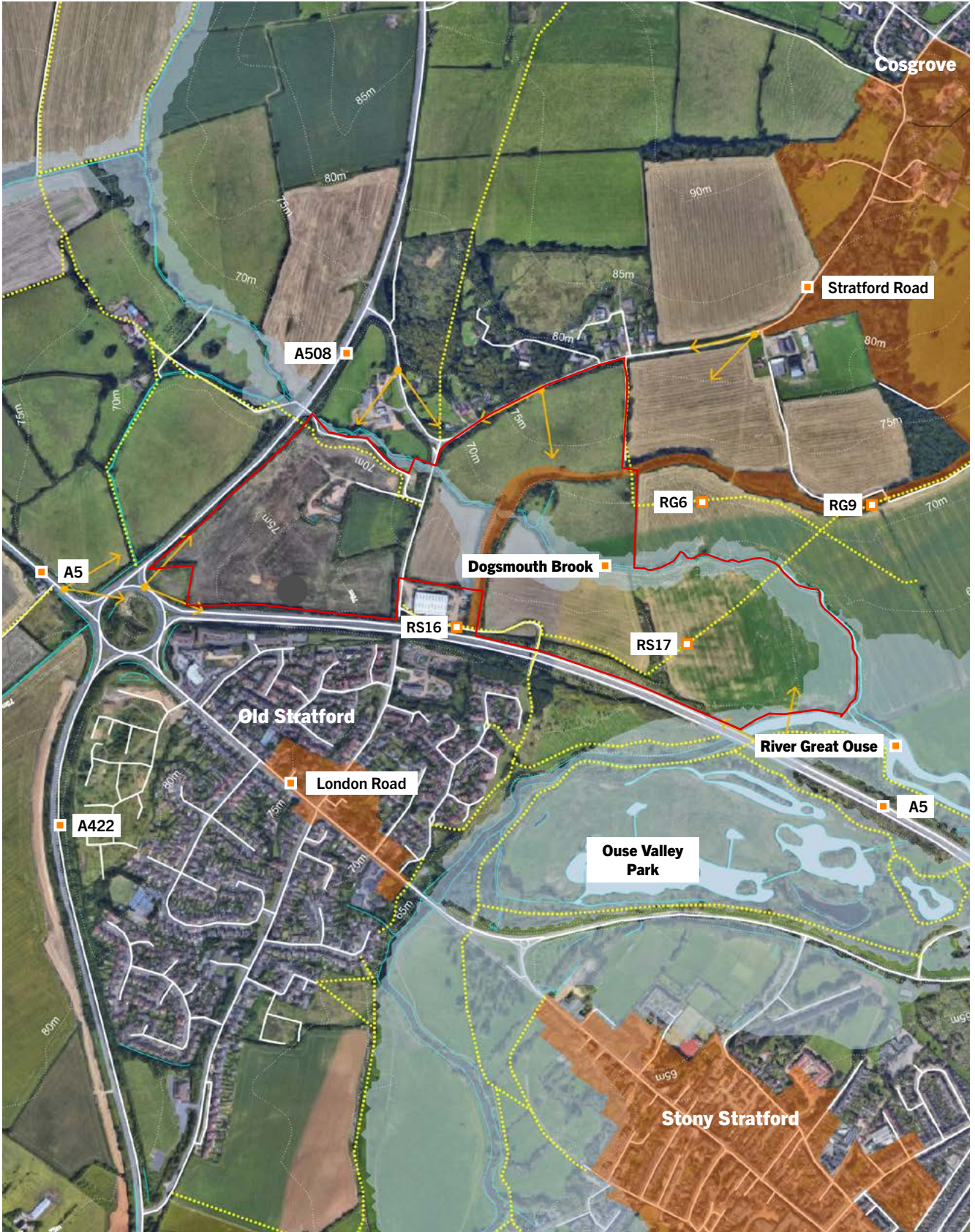
6.82 There is a line of listed buildings along London Road in Old Stratford, an area identified as a Conservation Area, approximately 300 metres south of the site.

6.83 There are several Scheduled Monuments in the area, the 'Motte and Bailey Castle' Deserted Village & Monastic Grange at Old Wolverton (NHLE 1013660), Wolverton iron trunk aqueduct (NHLE 1006934) and the Roman villa site at Cosgrove Hall (NHLE 1003874), all are approximately 800 metres east/north-east of the site.



- Flood Plain Area
- Conservation Area
- High Point
- Low Point
- Footpaths
- Potential Sensitive Receptor
- Watercourse

Figure 75 AL5 site assessment





## Site AL5 Development Framework

The development framework for AL5 establishes key parameters and principles.

### Access & Movement

6.84 The development framework AL5 provides an access into the site off the A508, with a new roundabout midpoint between Old Stratford Roundabout and the road's flyover of the Dogsmouth Brook. This access provides a link east west through the site, crossing the Cosgrove Road to access a small field to the north of the existing industrial unit before veering northwards to gain access to land north of Dogsmouth Brook/Stratford Arm of the Grand Union Canal.

6.85 New active travel routes need to connect up to the existing A5 pedestrian overpass link from Old Stratford to create a highly accessible employment area. New paths should enhance access and interaction with a new wetland corridor, along the Dogsmouth Brook, the Stratford Arm of the Grand Union Canal and potential extension to the Ouse Valley Parkland in the east of the site.

6.86 Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of a lighting plan and consistent use of wayfinding/signage should be considered.

### Drainage

6.87 The development framework AL5 sets out an integrated and attractive sustainable drainage network with swales located along green and woodland edges directing and filtering surface water to a series of basins located along a central wetland corridor. This network should seek to expand a flood plain area around Dogsmouth Brooke. It should also explore any opportunity to add ecological and amenity value to the development,

such as through the introduction of rain gardens & permeable surfacing within hard surface areas & along key vehicular and active travel routes. Ultimately the location of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.

### Green Infrastructure

6.88 The development framework AL5 sets out an integrated blue and green network with a green accessible wetland corridor running east west through the centre of the site. The corridor follows Dogsmouth Brook and incorporates SUDs provision and footpaths with attractive development frontage overlooking it. New riparian, hedgerow, decorative shrub and tree planting situated along the new wetland corridor, the key site edges (including Northampton/Stratford Road, A508 and the eastern countryside edge) and the Stratford Arm of the Grand Union Canal help create green infrastructure for wildlife in the area and frame pockets of new development.

6.89 The development framework AL5 proposes the site's eastern & central field and wetland corridor be retained as managed open countryside with the future potential to form an expansion to Ouse Valley Park, comprising enhancements to footpath access and habitat creation. This approach will help safeguard impacting the setting of the existing river parkland and scheduled monument further east.

### Building Height, Scale and Massing

6.90 The western end of AL5 may be able to accommodate a mix of unit sizes given its direct access off the

A508 and general limited exposure to views. This may see development rise to approximately 10-15 metres in height (from existing ground levels), in line with the existing storage unit, with effective screening to be provided from sensitive views by either existing or proposed tree planting. Small to medium sized buildings are most likely to be acceptable on land that sits along, or to the north of the Brook & Stratford Arm. Any development located in these areas should be accompanied by a strong and integrated schedule of landscape screening.

6.91 Large buildings/units, which have a greater impact i.e. are visible above tree cover/from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering the highest design quality and a thorough programme of landscape measures.

### Placemaking / Urban Form

6.92 The development framework AL5 suggests a series of key frontage opportunities at the Old Stratford Roundabout/A508 and along the new green accessible wetland corridor. These frontages would require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building facade can be introduced, particularly on the roundabout. The site's proximity to both the Grand Union Canal and Ouse Valley Parkland presents opportunities to build a connection to both these local assets through interpretative signage/public art within the landscape framework for the site.



Figure 76 AL5 development framework



**Key Features**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li><b>1</b> Western and Southern Development Areas</li> <li><b>2</b> Areas abutting sections of Dogsmouth Brook and Stratford Arm to be treated sensitively</li> <li><b>3</b> Eastern &amp; central field and section of the brook to be retained as open countryside / a potential future expansion to Ouse Valley Park</li> <li><b>4</b> Key vehicular access off A508</li> <li><b>5</b> New accessible green wetland corridor with SUDs provision</li> </ul> | <ul style="list-style-type: none"> <li><b>6</b> Network of new east west and north south footpaths.</li> <li><b>7</b> Key frontages onto Old Stratford Roundabout</li> <li><b>8</b> Key frontages along new wetland corridor</li> <li><b>9</b> Retain and enhance blocks and belts of woodland within the site</li> <li><b>10</b> New woodland to mitigate views of development from Northampton/Stratford Road and A5</li> </ul> |
|---|---|







# Exemplar Development & Flexibility

7

## 7. Exemplar Development

West Northamptonshire Council wish to see the allocated employment sites brought forward following a design-led approach, that sees the delivery of contextually appropriate high-quality buildings situated within an attractive landscape setting.

We understand that the market is in constant motion and therefore the factors affecting the form and type of development proposed across these employment sites will change over time. The need to be flexible is vital.

This SPD sees that underpinning this flexibility to market conditions will be a design-led approach that helps facilitate the delivery of exemplar development such as the following.

### Exemplar in Sustainability and Zero-Carbon Development

7.1 The Applicant should consider the delivery measures that enhance the development's sustainability, pushing it towards a zero carbon development and addressing the challenges of climate change. This should take account all aspects of construction from the supply chain to the building design and its lifecycle, as well as the environment which it sits in.

7.2 Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and help attract investment into the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments, aiming to meet BREEAM 'excellent' standards for water consumption, or the equivalent in any alternative set of standards,

### Exemplar in Architecture and Design

7.3 The highest quality of design will help deliver a landmark building for the wider community as well as a high-quality working environment for employees. The design of buildings should consider approaches to fenestration and ridgeline that ensure building facades have an appropriate sense of proportion and rhythm when viewed close up and from afar.

7.4 Over the course of a building's lifetime change is inevitable therefore any design should factor in the capacity for new buildings to be adaptable, accommodating substantial change in the future. This should be considered in relation to the building's structure, cladding and services.

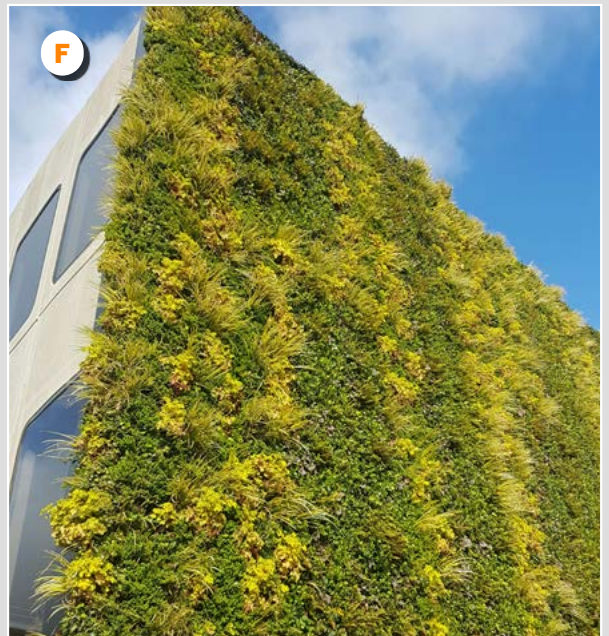
### Exemplar in Landscape Design and Placemaking

7.5 The quality of landscape design will be crucial to create a beautiful place and one that will provide a setting for high-quality buildings to stand the test of time.

### Exemplar in Job Creation and Economic and Social Benefit

7.6 The opportunity for development proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area.

- A** High quality working environment
- B** District heating system
- C** High quality architectural detailing and material
- D** High quality landscape design with integrated SUDs
- E** Apprenticeship programmes
- F** Green / Living Wall







# Summary & Conclusion

8



## 8. Summary

8.1 This SPD will help guide the future design and development across each of the four employment allocations AL1, AL2, AL4 and AL5 as set out within the Part 2 Local Plan. It is a material consideration in the determination of any planning application(s) across the sites.

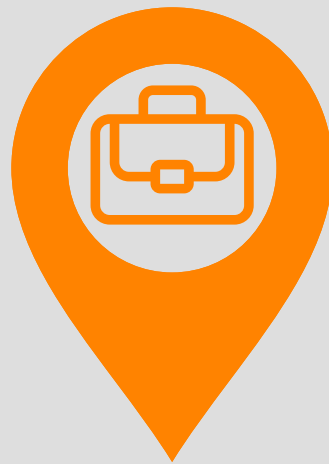
8.2 In its preparation this SPD considered the wider policy context as well as the wider physical context of each site. It sets out guiding principles and development parameters that need to be taken into account across each of the sites, informed by a thorough understanding of the physical constraints and opportunities that exist.

8.3 The purpose of the SPD is to improve the planning and development process by reducing uncertainty and clearly setting out guidance on what is expected from development proposals. The SPD brings together the policy framework with clear guiding principles for the future development of the sites.

8.4 This SPD has been subject to a fair and robust public consultation exercise. Subject to this SPD being adopted by the Council, this SPD will be a material consideration in the determination process of planning applications.

- A** Facade treatment with projected building elements accentuating corner of and entry to building.
- B** Strong landscape framework helping to integrate buildings into a landscape setting.
- C** Cloaking buildings in a green wall membrane so that plants soften the appearance and bring seasonal variety & colour to built form
- D** Adding cladding to define and articulate large building facades.









# Appendix

## Glossary

**A**

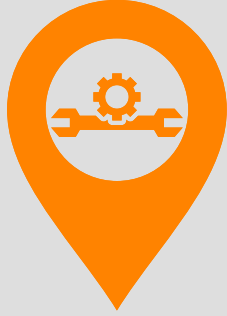
## A. Glossary

The following glossary looks to improve the accessibility of the SPD by providing clear definitions to some of the unfamiliar, industry-specific words used within the document.

<b>TERM</b>	<b>DEFINITION</b>
<b>Amenity</b>	A broad concept that refers to the pleasant or satisfactory aspects of a place which add positively to its overall character and to the enjoyment of residents or visitors. For example, it encompasses human health, quality design, provision and protection of local services, local economy and the protection of the countryside, historic environment, environmental character and visual, air and noise quality.
<b>Architecture</b>	The practice of designing and constructing buildings.
<b>AOD</b>	The term Above Ordnance Datum (AOD) is a spot height used as a basis for deriving altitude on maps. Usually means sea level.
<b>Climate change mitigation</b>	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
<b>Conservation Area</b>	Areas of special architectural or historic interest, the character, appearance or setting of which it is desirable to preserve or enhance
<b>Development</b>	Development means the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land.
<b>Development Framework</b>	A Development Framework sets a vision and a framework for the future development of an area.
<b>Employment land</b>	Land identified for business, general industrial, and storage and distribution development.
<b>Environmental impact assessment</b>	A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.
<b>Evidence base</b>	The information and data gathered by local authorities to justify the “soundness” of the policy approach set out in Local Plans, including physical, economic, and social characteristics of an area.
<b>Green infrastructure</b>	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Green Infrastructure also encompasses water-based environments such as rivers and smaller watercourse systems, coastal environments, reservoirs, wetlands, ponds and urban Sustainable Drainage systems. These are sometimes known as blue infrastructure or blue spaces.
<b>Hectare</b>	A metric unit to measure land. One hectare equals 2.47 acres or 10,000 square metres
<b>Historic England</b>	Government body with responsibility for all aspects of protecting and promoting the historic environment.
<b>Infrastructure</b>	Identifies physical, social and green infrastructure, such as new roads, schools and open spaces.
<b>Listed building</b>	A building of special architectural or historic interest. Graded I (highest quality), II* or II. Listing includes the interior as well as the exterior of the building, and includes any buildings or permanent structures within its curtilage which have formed part of the land since before 1 July 1948. Historic England is responsible for designating buildings for listing in England.
<b>Material consideration</b>	A material consideration is a matter which the decision maker must take into account when assessing a planning application.

<b>TERM</b>	<b>DEFINITION</b>
<b>Open Space</b>	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
<b>Supplementary Planning Documents</b>	Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.
<b>Transport assessment and Statements</b>	A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and measures that will be needed deal to with the anticipated transport impacts of the development.
<b>Travel plan</b>	A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.

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# Appendix

## LDP Design Briefs

**B**

## B. LDP Design Briefs

This appendix includes the Design Briefs for each of the four policy sites, extracted from the [Part 2 Local Plan](#).

### AL1: Land at Bell Plantation, Towcester

- 1** Development description: located to the north of Towcester on land associated with and including the Bell Plantation and adjoining the A43 and A5, this development site provides for 35ha of mixed employment generating development together with 6ha of land for the creation of a Towcester Town Football Club home ground. A variety of employment types will be sought to reflect the need for diversity and resilience in the local economy as expressed in the council's economic growth strategy.
- 2** An integrated, coordinated and comprehensive planning approach will be taken for the site and a masterplan must be prepared, in consultation with the local planning authority and the local highway authority, Towcester Town Council and other statutory undertakers prior to the submission of a planning application covering the development of the whole site.
- 3** Land Uses: Employment
  - a.** An independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.
- 4** Land uses: Towcester Town Football Club
  - a.** 6ha to be provided within the allocated site with the precise location dependent on suitable topography; and
  - b.** The design and layout of the employment element of the mixed use site should be compatible with, and not prejudice the delivery of, the football facilities.
  - c.** Funding for the football club may be funded in part by contributions from the Council's Community Infrastructure Levy.
- 5** Access and transport
  - a.** Access to the employment site to be from the A5; and
  - b.** access to the football club site to be provided by the developer of the employment part of the site, from either within the employment site or from a new separate access from the A5 and provision of an unfettered road access point to the edge of the football club site; and
  - c.** good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services and promote sustainable travel; and
  - d.** a transport assessment and travel plan will be required to assess the transportation implications of the proposed development and to identify appropriate mitigation measures; and
  - e.** provision of new footpaths and cycleways that link to existing networks and safe crossing points on the A43.
- 6** Key site specific design and place shaping principles (whole development), in addition to those required under policy SS2 include:
  - a.** a detailed heritage impact assessment will be required for the whole site, to be agreed with the Local Planning Authority in consultation with Historic England, prior to the design of the scheme in order to inform the height of any proposed buildings, layout and extent of the development. This will explicitly include an assessment of the height of any new buildings and impact on the Easton Neston Grade II\* Registered Park and Garden as well as detailed consideration of any impacts on designated and non-designated heritage assets and subject to the assessment being agreed a programme of informed mitigation to be included with any application; and
  - b.** a detailed strategic landscape assessment of the whole site to deliver a high quality landscaped setting within and around the boundary of the proposal; and
  - c.** prior to submission of an application, detailed assessment for the whole site to characterise archaeological remains and identify direct impact of development proposals to inform design and a programme of archaeological mitigation; and
  - d.** provision of utilities up to the edge of the site for the football club; and e. appropriate financial contributions to mitigate the impact of the development.

## AL2: Land at Woolgrowers Field, Towcester

- 1** Development description: located to the north of Towcester bounded by the A5 to the east and Towcester road and the A43 to the south, this development site provides for 4.5 hectares of mixed employment generating development. A variety of employment types will be sought to reflect the need for diversity and resilience in the local economy as expressed in the council's economic growth strategy.
- 2** An integrated, coordinated and comprehensive planning approach will be taken for the employment site and a masterplan must be prepared, in consultation with the local planning authority, the local highway authority and other statutory undertakers prior to the submission of a planning application covering the development of the whole site.
- 3** Land Uses: Employment
  - a.** An independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.
- 4** Access and transport
  - a.** Access to the employment site to be from the A5 and/or the Greens Norton Road; and
  - b.** good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services and promote sustainable travel; and
  - c.** a transport assessment and travel plan will be required to assess the transportation implications of the proposed development and to identify appropriate mitigation measures; and
  - d.** provision of new footpaths and cycleways that link to existing networks and safe crossing points on the A43.
- 5** Key site specific design and place shaping principles (whole development), in addition to those required under Policy SS2 include:
  - a.** a detailed heritage impact assessment will be required for the whole site to be agreed with the Local Planning Authority in consultation with Historic England, prior to the design of the scheme in order to inform the height of any proposed buildings, layout and extent of the development. This will explicitly include an assessment of the height of any new buildings and impact on the Easton Neston Grade II\* Registered Park and Garden as well as detailed consideration of any impacts on designated and non-designated heritage assets and subject to the assessment being agreed a programme of informed mitigation to be included with any application; and
  - b.** prior to submission of an application, detailed assessment for the whole site to characterise archaeological remains and identify direct impact of development proposals to inform design and a programme of archaeological mitigation; and
  - c.** a detailed strategic landscape assessment of the whole site to deliver a high quality landscaped setting within and around the boundary of the proposal.

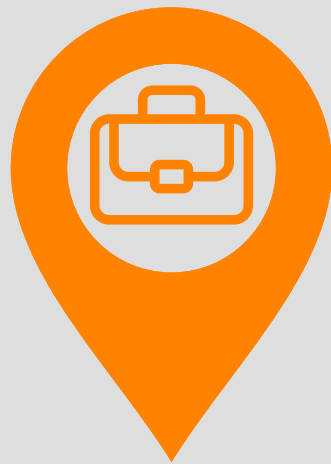
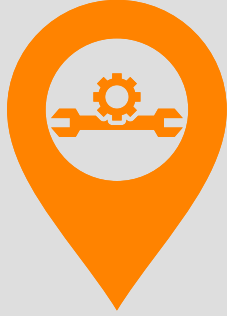
## AL4: Land at Shacks Barn, Whittlebury

- 1** Development description: located an important position adjoining the A43, southwest of Towcester, close to the Whittlebury junction, this development site provides for 10ha of mixed employment generating development. An integrated, coordinated and comprehensive planning approach will be taken and a masterplan must be prepared, in consultation with the Local Planning Authority and statutory undertakers prior to the submission of a planning application covering the development of the whole site.
- 2** Land uses employment a. An independently assessed, market-evidenced proportion of B1 (office), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.
- 3** Access and transport
  - a.** Access to the site to be based on the existing access only; and
  - b.** Provision of new footpaths and cycleways that link to existing networks; and
  - c.** Good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of pedestrian cycling and walking links between the site and Towcester town; and
  - d.** A transport assessment and travel plan will be required to assess the transportation implications of the proposed development and to identify appropriate mitigation measures; and
- 4** Key site specific design and place shaping principles (whole development) in addition to those required under Policy SS2 include:
  - a.** A detailed heritage impact assessment will be required for the whole site, to be agreed with the Local Planning Authority in consultation with Historic England, prior to the design of the scheme in order to inform the height of any proposed buildings, layout and extent of the development. This will explicitly include an assessment of the height of any new buildings and impact on the Easton Neston Grade II\* Registered Park and Garden as well as detailed consideration of any impacts on the designated and non designated heritage assets and subject to the assessment being agreed a programme of informed mitigation to be included with any application; and
  - b.** Prior to submission of an application, detailed assessment for the whole site to characterise archaeological remains and identify direct impact of development proposals to inform design and a programme of archaeological mitigation; and
  - c.** A detailed strategic landscape assessment of the whole site to deliver a high quality landscaped setting within and around the boundary of the proposal; and
  - d.** Appropriate financial contributions to mitigate the impact of the development on services and facilities as required by the council's policies.



## AL5: Land at Former Furtho Pit, Old Stratford / Cosgrove

- 1** Development description: located at an important position adjoining the A5 and A508, this development site provides for 16 ha. of mixed employment generating development. A variety of employment types will be sought to reflect the need for diversity and resilience in the local economy as expressed in the council's economic growth strategy.
- 2** An integrated, coordinated and comprehensive planning approach will be taken for the employment site and a masterplan must be prepared, in consultation with the local planning authority, the relevant highway authorities and other statutory undertakers prior to the submission of a planning application covering the development of the whole site.
- 3** Land uses employment
  - a.** An independently assessed, market-evidenced proportion of B1 (business)(office), B2 (general industrial) and B8 (storage and distribution) with ancillary with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.
- 4** Access and transport
  - a.** Access from a new roundabout junction from the A508; and
  - b.** Provision of new footpaths and cycleways that link to existing networks including to a proposed new adjoining country park and utilising the existing pedestrian crossing over the A5 linking to Old Stratford having appropriate regard to the retention and enhancement of the existing public rights of way through the site; and
  - c.** Good accessibility to public transport services should be provided for including contributions to the cost of establishing bus services including stops to the site, to promote sustainable transport; and d. A transport assessment and travel plan will be required to assess the transportation implications of the proposed development (including noise from the A5 and A508) and to identify appropriate mitigation measures
- 5** Key site specific design and place shaping principles (whole development); in addition to those required under Policy SS2 include: a detailed heritage impact assessment will be required to be agreed with the local Planning Authority in consultation with Historic England, prior to the design of the scheme in order to inform the height of any proposed buildings, their layout and the extent of the development. This will include
  - a.** detailed assessment of the effects of the development of the site on the significance of the scheduled monument 1013660 'Motte and Bailey Castle' Deserted Village and Monastic Grange at Old Wolverton; as well as detailed consideration of the development's effects on the significance of other designated and non-designated heritage assets, if any. The agreed assessment will inform any mitigation works required to ensure that the development of the site would avoid harm to the significance of heritage assets; and
  - b.** detailed consideration of the safeguarding of the existing canal route through the site and how the layout of the country park has regard to the potential future need for new sections of canal to cross it to facilitate restoration; and
  - c.** prior to submission of an application, detailed assessment to characterise archaeological remains and identify direct impact of development proposals to inform design and a programme of archaeological mitigation which could involve preservation in situ by design or record or a combination of the two. This to be agreed with Historic England; and
  - d.** protection of the existing Anglian water drainage and water infrastructure that crosses the site; and
  - e.** detailed strategic landscape and visual impact assessments of the whole site to deliver a high quality landscaped setting within and around the boundary of the proposal; and
  - f.** appropriate financial contributions to mitigate the impact of the development on services and facilities as required by the council's policies; and g. detailed impact assessments will be required explaining how the proposals will safeguard the local wildlife site within its boundary and contribute towards biodiversity net gains.





# **Appendix**

## **Additional**

### **Relevant Policy**

**C**

## C. Additional Relevant Policy

This appendix includes Policy S1, S8, S10 & T1 extracted from the [Joint Core Strategy](#) and Policy SS2 the [Part 2 Local Plan](#).

### Policy S1: The Distribution of Development

Development and economic activity will be distributed on the following basis:

- a. Development will be concentrated primarily in and adjoining the principal urban area of Northampton;
- b. Appropriate development of a lesser scale will be located in and adjoining the sub-regional centre of Daventry town centre;
- c. The development needs of rural service centres of Towcester and Brackley and the rural areas will also be provided for;
- d. New development in the rural areas will be limited with the emphasis being on:
  1. Enhancing and maintaining the distinctive character and vitality of rural communities;
  2. Shortening journeys and facilitating access to jobs and services;
  3. Strengthening rural enterprise and linkages between settlements and their hinterlands; and
  4. Respecting the quality of tranquillity in assessing the suitability of sites for development.

### Policy T1: Spatial Strategy for Towcester

The role of Towcester as a Rural Service Centre will be supported and enhanced by the following developments and other proposals:

- a. Housing development within the existing urban area and as part of the Towcester South Sustainable Urban Extension (see policy T3);
- b. Employment development as part of the regeneration of the town centre and as part of the Towcester South Sustainable Urban Extension;
- c. The regeneration of Towcester town centre, principally through the mixed use development of the Moat Lane Area (Policy T2);
- d. Additional services and facilities provided through the regeneration of the town centre and the Towcester South sustainable urban extension;
- e. Delivery of an A5 relief road and complementary sustainable transport measures to improve air quality and reduce congestion in the town centre;
- f. The provision of additional comparison (non food) shopping floorspace within the town centre and local shopping facilities within the Towcester South Sustainable Urban Extension; and
- g. Supporting the protection and improvement of the facilities provided at Towcester racecourse (Policy T5).

### Policy S10 – Sustainable Development Principles

Development will:

- a. achieve the highest standards of sustainable design incorporating safety and security consideration and a strong sense of place;
- b. designed to improve environmental performance, energy efficiency and adapt to changes of use and a changing climate over its lifetime;
- c. make use of sustainably sourced materials;
- d. minimise resource demand and the generation of waste and maximise opportunities for reuse and recycling;
- e. be located where services and facilities can be easily accessed by walking, cycling or public transport;
- f. maximise use of solar gain, passive heating and cooling, natural light and ventilation using site layout and building design;
- g. maximise the generation of its energy needs from de-centralised and renewable or low carbon sources;
- h. maximise water efficiency and promote sustainable drainage;
- i. protect, conserve and enhance the natural and built environment and heritage assets and their settings;
- j. promote the creation of green infrastructure networks, enhance biodiversity and reduce the fragmentation of habitats; and
- k. minimise pollution from noise, air and run off.

### Policy S8: Spatial Distribution of Jobs

Employment provision within South Northamptonshire District comprising:

- a. Renewal and regeneration of existing employment sites as set out in Policy E1;
- b. High performance technology motorsport cluster at Silverstone Circuit as set out in Policy E5;
- c. Local employment provision within sustainable urban extension policies; and
- d. Tourism and Visitor Development in the Rural Areas as set out in Policies E7 and R2.

**Policy SS2: General Development and Design Principles**

- 1** Planning Permission will be granted where the proposed development:
  - a.** maintains the individual identity of towns and villages and their distinct parts, does not result in physical coalescence that would harm this identity and does not result in the unacceptable loss of undeveloped land, open spaces and locally important views of particular significance to the form and character of the settlement; and
  - b.** uses a design-led approach to demonstrate compatibility and integrations with its surroundings and the distinctive local character of the area in terms of type, scale, massing, siting, form, design, materials and details; and
  - c.** is designed to provide an accessible, safe and inclusive environment which maximises opportunities to increase personal safety and security through preventative or mitigation measures; and
  - d.** incorporates suitable landscape treatment as an integral part of the planning of the development; and
  - e.** incorporates sensitive lighting schemes that respects the surrounding area and reduce harmful impacts on wildlife and neighbours; and
  - f.** will result in a good standard of amenity for its future occupiers in terms of privacy, sunlight, daylight, outlook, natural ventilation, noise, odour and vibration, overshadowing or result in loss of privacy, sunlight daylight or outlook, unless adequate mitigation measures are proposed and secured; and
  - g.** has appropriate regard to its effect on air quality and the effects of air quality on its future occupiers; and
  - h.** does not result in the loss of the best and most versatile agricultural land or valued soils; and
  - i.** contributes towards the creation of a healthy community and, in the case of major development, demonstrates the health and wellbeing implications of the proposed development through a suitable health impact assessment (HIA). All major developments (10 or more dwellings or 1,000 or more square metres) will be expected to complete and submit a rapid HIA in order to determine if more substantial HIS is necessary or not, while larger developments above 100 homes will be expected to complete a more substantial HIA to support their application; and
  - j.** would include a safe and suitable means of access for all people (including pedestrians, cyclists and those using vehicles) and
  - k.** takes into account existing or planned social and transport infrastructure to ensure development is adequately served by public transport or is in reasonable proximity to a range of local facilities which can be reached without the need for private car journeys; and
  - l.** is adequately serviced with utility infrastructure appropriate to the development including power, water supply, sewerage, waste management and telecommunications and provides for satisfactory foul and surface water drainage and incorporates mitigation identified through an assessment of flood risk and the management requirements to address current and future risks incorporating the required climate change allowance; and meets the optional higher water efficiency standard of 110 litres per person per day; and
  - m.** will not adversely affect built heritage and sites of nature conservation value or sites of geological, geomorphological or archaeological importance; and
  - n.** is not on or in proximity to land containing mineral resources, or if known resources exist without first considering the need to safeguard these resources; and
  - o.** would not pose additional risk to users, occupiers and neighbours located in the vicinity of sites that are used for storage, or processing or transporting of hazardous substances; and
  - p.** shows a detailed consideration of ecological impacts, wildlife mitigation and the creation, restoration and enhancement of wildlife corridors to preserve and enhance biodiversity; and
  - q.** ensures an appropriate degree of facility provision and waste and recycling storage. Provision should be made for discrete bin storage, ideally within private rear gardens and service yards where it will not result in visual clutter which can substantially detract from the character and perceived quality of the streetscene’.
- 2** Proposals that contravene any of the above criteria (of relevance to that proposal) will be refused unless outweighed by other material considerations.
- 3** Major development proposals will also be required to:
  - a.** retain, enhance or create a high quality public or semi public realm; and
  - b.** enhance legibility through the spatial pattern of development and street hierarchy.
  - c.** The use of design codes, masterplans or planning briefs will be considered for multi-phased developments to ensure consistency of design approach.





# WEST NORTHAMPTONSHIRE COUNCIL

## PLANNING POLICY COMMITTEE

25<sup>th</sup> October 2022

**Councillor Rebecca Breese**

**Cabinet Member for Strategic Planning, Built Environment and Rural Affairs**

<b>Report Title</b>	<b>Updated West Northamptonshire Local Development Scheme</b>
<b>Report Author</b>	<b>Paul Everard Planning Policy &amp; Heritage Manager paul.everard@westnorthants.gov.uk</b>

### Contributors/Checkers/Approvers

<b>West S151</b>	Martin Henry Executive Director, Finance	<b>Email approval obtained 6<sup>th</sup> October 2022</b>
<b>Director</b>	Stuart Timmiss Executive Director: Place, Economy & Environment	<b>Email approval obtained 6<sup>th</sup> October 2022</b>
<b>Legal</b>	Neil Weeks Solicitor	<b>Email approval obtained 6<sup>th</sup> October 2022</b>
<b>Communications</b>	Becky Hutson	<b>Email approval obtained 6<sup>th</sup> October 2022</b>

### List of Appendices

#### **Appendix A – Updated West Northamptonshire Local Development Scheme**

##### **1. Purpose of Report**

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- 1.1. To seek approval for an updated Local Development Scheme which sets out a timetable for local plan preparation.

## **2. Executive Summary**

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- 2.1 Local Planning Authorities are required to produce, and keep up to date, a Local Development Scheme (LDS) which sets out and timetables the local plans they will prepare to plan for development in their area.
- 2.2 Members may recall that the West Northamptonshire LDS was updated in July 2022. Now that the inspectors examining the Northampton Local Plan Part 2 (NLPP2) have found that it is necessary to consult the public on Further Main Modifications to the NLPP2 (see separate report elsewhere on this agenda), it is necessary to make further changes to the LDS as this will have an impact on when the NLPP2 can be adopted. Separately from this, it is also necessary to amend the LDS to take account of amended timeframes for production of the West Northamptonshire Strategic Plan (WNSP).

## **3. Recommendations**

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- 3.1 It is recommended that the Committee:
- a) Approves the updated West Northamptonshire Local Development Scheme (Appendix A) which is to be brought into effect upon the expiry of the call-in period for Planning Policy Committee decisions.
  - b) Delegates to the Assistant Director: Planning, in consultation with the Portfolio Holder for Planning, Built Environment and Rural Affairs, authority to make minor editorial and presentational changes to the Local Development Scheme in its final published form.

## **4. Reason for Recommendations (NOTE: this section is mandatory and must be completed)**

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- 4.1 It is a statutory requirement for the Council to produce an LDS setting out the Local Plans which, when prepared, will comprise part of the development plan for the area. The LDS must be made available to the public and kept up to date. For West Northamptonshire, a new LDS is needed to set out revised timetables for the next stages in the preparation of the West Northamptonshire Strategic Plan and final stages in the preparation of the Northampton Local Plan Part 2.

## **5. Report Background**

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- 5.1 The Local Development Scheme needs to be updated for two main reasons. Firstly, following the Proposed Modifications consultation on the Northampton Local Plan Part 2 the planning inspectors examining the plan have informed us that they consider it necessary for us to consult on Further Main Modifications as set out elsewhere on the agenda for this meeting. As this is an additional stage of public consultation it has an impact on when the NLPP2 can be adopted. Secondly, further consideration is being given to the scope and focus of the Strategic Plan, including potential additional work to further assess the potential for urban regeneration and development on brownfield land, which will impact on the timetable. Whilst uncertainty remains about exactly when the next consultation stage will take place, it will not be possible to achieve the December date in the current LDS. Therefore, it is suggested that this date be moved



provisionally to June 2023. The Council is required to specify the date that the LDS will be brought into effect. It is suggested that this should be upon the expiry of the call-in period for Planning Policy Committee decisions.

- 5.2 The updated LDS attached at Appendix A sets out the anticipated timetable for the preparation of the WNSP and the examination and adoption stages of the NLPP2. The LDS envisages that the WNSP will be submitted for examination in May 2024 with adoption in September 2025. On the assumption that consultation on the Proposed Modifications to the NLPP2 starts on 7<sup>th</sup> November 2022 and the Planning Inspectors are able to produce their report in mid January 2023, it is anticipated that adoption of the NLPP2 will take place in March 2023, at Full Council, following consideration of a report by this Committee in February.

## **6. Issues and Choices**

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- 6.1 The updated LDS presented at Appendix A sets out a timetable for the completion of the remaining stages of the NLPP2 and a revised timetable for the preparation of the WNSP based on the resources currently available. It is a statutory requirement for the Council to publish an LDS and ensure that it is up to date. As such, failing to approve an LDS is not an option.
- 6.2 The Committee could consider options for preparing the WNSP more quickly, but this would necessitate additional resources and may also run the risk that the plan would not be thoroughly prepared and could be found unsound at examination.

## **7. Implications (including financial implications)**

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### **7.1 Resources and Financial**

- 7.1.1 The costs of producing the updated LDS can all be met from existing resources.

### **7.2 Legal**

- 7.2.1 Section 15 of the Planning and Compulsory Purchase Act sets out the statutory requirement for local planning authorities to publish a Local Development Scheme and ensure that it is kept up to date.

### **7.3 Risk**

- 7.3.1 Failure to maintain an up-to-date LDS could result in the WNSP and the NLPP2 failing legal tests.

### **7.4 Consultation and Communications**

7.4.1 There is no requirement for formal consultation on the LDS. Once the LDS is published, communications and consultation activities will play a key role as the timetables move forward for preparing the local plans for development in their area.

7.5 **Consideration by Overview and Scrutiny**

7.5.1 Not applicable.

7.6 **Climate Impact**

7.6.1 The approval of the LDS does not have any direct implications for climate change. However, the NLPP2 includes policies to address climate change that will contribute to the Council's ambitions in this respect. The WNSP will include policies that will address climate change.

7.7 **Community Impact**

7.7.1 The LDS provides information to the community on the timetable for the preparation of Local Plans and opportunities to be involved.

**8. Background Papers**

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None



West  
Northamptonshire  
Council

# West Northamptonshire Local Development Scheme

November 2022



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## **1.0 WHAT IS A LOCAL DEVELOPMENT SCHEME**

1.1 A Local Development Scheme (LDS) sets out and timetables the key planning policy documents that local planning authorities (LPAs) will prepare to plan for development in their area. Its main purpose is to ensure that local communities, businesses, developers, service and infrastructure providers and other interested organisations know when they will be able to participate. It is a requirement of the Planning and Compulsory Purchase Act 2004 (as amended by Section 111 of the Localism Act (2011)) that LPAs prepare and maintain an LDS.

1.2 The LDS must specify:

- The local development documents which are to be development plan documents;
- The subject matter and geographical area to which each development plan document is to relate;
- Which development plan documents (if any) are to be prepared jointly with one or more other local planning authorities;
- Any matter or area in respect of which the authority have agreed (or propose to agree) to the constitution of a joint committee;
- The timetable for the preparation and revision of the development plan documents; and
- Such other matters as are prescribed.

1.3 Development plan documents must be prepared in accordance with the LDS.

1.4 This LDS is the second to be prepared by West Northamptonshire Council. It sets out the programme for the production of the following local plans:

- a) the West Northamptonshire Strategic Plan which it is intended will review and replace the policies that address the strategic priorities of the area in the West Northamptonshire Joint Core Strategy (adopted in December 2014); and
- b) the Northampton Local Plan (Part 2) which will provide detailed planning policies to manage and guide development across the former borough council area.

## **2.0 THE DEVELOPMENT PLAN CONTEXT IN WEST NORTHAMPTONSHIRE**

2.1 The statutory development plan is a suite of documents that set out a local authority's policies and proposals for the development and use of land in their area.

2.2 Development plan documents (DPDs) must be written to be in general conformity with government guidance, in particular the National Planning Policy Framework (NPPF).

Development plan documents include:

- Local plans for a council area (or for more than one council area if working together). Preparation of a local plan is a statutory requirement. A local plan may be a single document or a suite of documents with some covering specific policy matters or specific geographical areas.
  - Neighbourhood development plans can be produced by town or parish councils or other relevant bodies to set out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular, specified neighbourhood area. They are not prepared by the local planning authorities but are submitted to them ahead of independent examination and referendum. Neighbourhood development plans are not legally defined as development plan documents but do become part of the statutory development plan when they are 'made' (adopted).
- 2.3 West Northamptonshire Council was established on 1<sup>st</sup> April 2021 and encompasses the former administrative areas of Daventry District, Northampton Borough and South Northamptonshire Councils. For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004, on publication of this LDS in November 2022 the Development Plan for West Northamptonshire comprises:

- **West Northamptonshire Joint Core Strategy Local Plan (Part 1)** – Adopted December 2014;
- **Settlements and Countryside Local Plan (Part 2) for Daventry District 2011-2029** – Adopted February 2020;
- **South Northamptonshire Local Plan (Part 2) 2011-2029** – Adopted July 2020
- Saved policies of the **Northampton Local Plan** – Adopted June 1997;
- **Northampton Central Area Action Plan** – Adopted January 2013; and
- **Northamptonshire Minerals and Waste Local Plan** – Adopted July 2017.

- **neighbourhood development plans** which have been formally ‘made’ by West Northamptonshire Council and the predecessor authorities<sup>1</sup>

### **West Northamptonshire Joint Core Strategy Local Plan (Part 1) (JCS)**

- 2.5 The JCS sets out the long-term vision and objectives for the whole of the West Northamptonshire area for the plan period up to 2029, including strategic policies for steering and shaping development. The Plan includes overall targets for the provision of homes and jobs and identifies specific locations for new strategic housing and employment together with the transport and other infrastructure required to support development.
- 2.6 The JCS provided a strategic framework to guide the preparation of the Part 2 Local Plans for Daventry District, Northampton Borough and South Northamptonshire. These Plans provide more detailed planning policies and site allocations for each of the former council areas.

### **Settlements and Countryside Local Plan (Part 2) for Daventry District 2011-2029**

- 2.7 The part 2 local plan for the Daventry area was adopted in February 2020. The Plan sets out clear local policies, standards and criteria against which all proposals for development and change of use of land and buildings in the Daventry Area will be assessed and to inform planning decisions in the period to 2029. The Plan also includes a settlement hierarchy and allocations of land to meet development needs identified in the JCS including policies, standards and criteria related to sites for gypsies, travellers and travelling showpeople.

### **South Northamptonshire Local Plan (Part 2) 2011-2029**

- 2.8 The part 2 local plan for the South Northamptonshire area was adopted in July 2020 and includes the following key components:
- Village and town confines;
  - Designation of local green space;
  - Establishing a settlement hierarchy;
  - Provision of new and extended employment sites;
  - Historic conservation, open space, landscape and nature conservation policies and designations;
  - Day to day development management policies;
  - Urban and rural non-strategic employment allocations; and
  - Policies map

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<sup>1</sup> Further information on Neighbourhood Plans is available via the following links: [Daventry Area](#) [Northampton Area](#) [South Northamptonshire Area](#)

### **Saved Policies from the 1997 Northampton Local Plan**

- 2.9 A number of policies from the 1997 Northampton Local Plan were saved in 2007 to ensure that they remained part of the development plan until they could be replaced by subsequent local plans. Some of these policies were subsequently replaced by the West Northamptonshire Joint Core Strategy and the Northampton Central Area Action Plan but a number of saved policies remain. These remaining policies will be replaced by the Northampton Local Plan (Part 2) when it is adopted.

### **Northampton Central Area Action Plan (CAAP)**

- 2.10 The CAAP was adopted in January 2013 and provides specific planning policy and guidance for Northampton town centre and adjoining areas where significant regeneration or investment is proposed in the period up to 2026. The continuing regeneration and growth of Northampton's central area, coupled with planning reforms, such as the prior notification system for changes of use from business to residential, means that it is necessary to review the CAAP's policies and proposals. The Northampton Local Plan Part 2 will include those policies which remain up to date and any CAAP policies which need updating. Once adopted, the part 2 local plan will replace the CAAP.

### **Northamptonshire Minerals and Waste Local Plan**

- 2.11 Northamptonshire County Council was responsible for the preparation of the Minerals and Waste Plan which sets out the strategy, policy and locations for minerals and waste development. The Minerals and Waste Plan update, which concentrated on reviewing the sites and allocations in the previously adopted 2014 Local Plan, was adopted in July 2017. It provides planning policies and site allocations for minerals and waste development in the whole of Northamptonshire. Future reviews of the Minerals and Waste Plan will be the responsibility of West Northamptonshire Council and will be set out in a separate minerals and waste development scheme.

## **3.0 THE FUTURE DEVELOPMENT PLAN**

- 3.1 This section sets out the development plan documents which will be prepared over the three-year period from November 2022 to September 2025.

### **Northampton Local Plan Part 2**

- 3.2 This Part 2 Local plan will cover the former administrative area of Northampton Borough Council including the Northampton central area and will be consistent with the JCS. The plan will cover the period up to 2029 and its main scope will be as follows:



- Site specific allocations including residential and employment uses;
  - Detailed development management policies against which planning applications will be determined;
  - Identification, phasing and implementation of local infrastructure;
  - Boundaries of retail centres;
  - Historic conservation, open space and nature conservation policies and designations; and
  - Policies map
- 3.4 Preparation of the plan is well-advanced and adoption is anticipated in March 2023. The timetable for completing the remaining stages of plan preparation is set out in Section 5.

### **West Northamptonshire Strategic Plan**

- 3.7 This plan will review and where appropriate replace the policies that address the strategic priorities for the area in the adopted West Northamptonshire Joint Core strategy Local Plan (Part 1).
- 3.8 The scope of the plan will focus on strategic matters which will, as a minimum, meet the requirements of the revised NPPF for authorities to have a plan that addresses the strategic priorities for their areas. There will be a particular emphasis on place making for our communities to ensure that development and associated infrastructure is delivered through a plan led approach which ensures development of the right quality, in the right place and at the right time.
- 3.9 To address the key strategic priorities for the area the scope of the plan will comprise:
- **The spatial strategy** for the distribution of development.
  - **Climate change resilience** – as a cross cutting theme that runs through the plan’s strategy and policies.
  - **Place-shaping / sustainable development** – Key principles to ensure quality development and sustainable places.
  - **Natural and built environment** - the protection and enhancement of natural/built and historic assets and achieving net biodiversity gain.
  - **The housing requirement** – the number and type of new homes to be provided across West Northamptonshire and the proportion of the overall housing requirement that should be affordable.
  - **Economic growth** – Targets for the provision of jobs and employment land in West Northamptonshire and guidance on the strategic locations for new employment land to meet the jobs requirement. New policy guidance for town centres and retail development.
  - **Strategic infrastructure** – The key primary infrastructure projects that are required to deliver the strategy such as strategic transport schemes utility networks and community facilities.

- **Health** - ensuring people can lead active lifestyles, including access to good quality open space, natural and semi natural greenspace and enjoy cleaner air.
- **Strategic development locations and opportunities** – Key strategic sites that are crucial to the delivery of the spatial strategy will be identified in the Plan.

3.10 The spatial vision will be extended to align with the statutory plan period i.e. to 2041.

### **Stages of Plan Preparation**

3.11 The various stages of development plan document preparation, as prescribed by regulations, are summarised below, where progress has already been made, this is noted:

- **Commencement/ early tasks** – This stage involves gathering evidence, including the views of local communities. It also involves initial consultation on the sustainability appraisal technical report.
- **Pre-submission (Regulation 18)** – Consultation on the issues to be addressed by the plan followed by a consultation on the options to address these issues. Engagement with stakeholders and the community will continue throughout the pre-submission stage and is expected to include a consultation on a full draft of the plan. An Issues consultation was undertaken in the autumn of 2019 and an Options consultation in Autumn 2021.
- **Proposed Submission Consultation or Publication Stage (Regulation 19)** – This stage involves a formal consultation on the final version of the local plan, when the council will invite all interested parties to submit representations.
- **Submission (Regulation 22)** – The council will formally submit the local plan to the Secretary of State for independent examination.
- **Examination** – Interested parties can make representations to an independent Planning Inspector. Following the examination the Inspector will produce a report and may recommend changes.
- **Adoption** – This is the process whereby the council will adopt the local plan as part of the statutory development plan for the area.

3.12 The programme for preparing the West Northamptonshire Strategic Plan is set out in the schedule in section 5 and the LDS timetable in Appendix 1 at the end of this document. The council is expected to progress the preparation of the Plan in accordance with the schedule and progress on meeting the programme will be reported annually in the authority monitoring report. If significant changes occur the LDS will be reviewed.

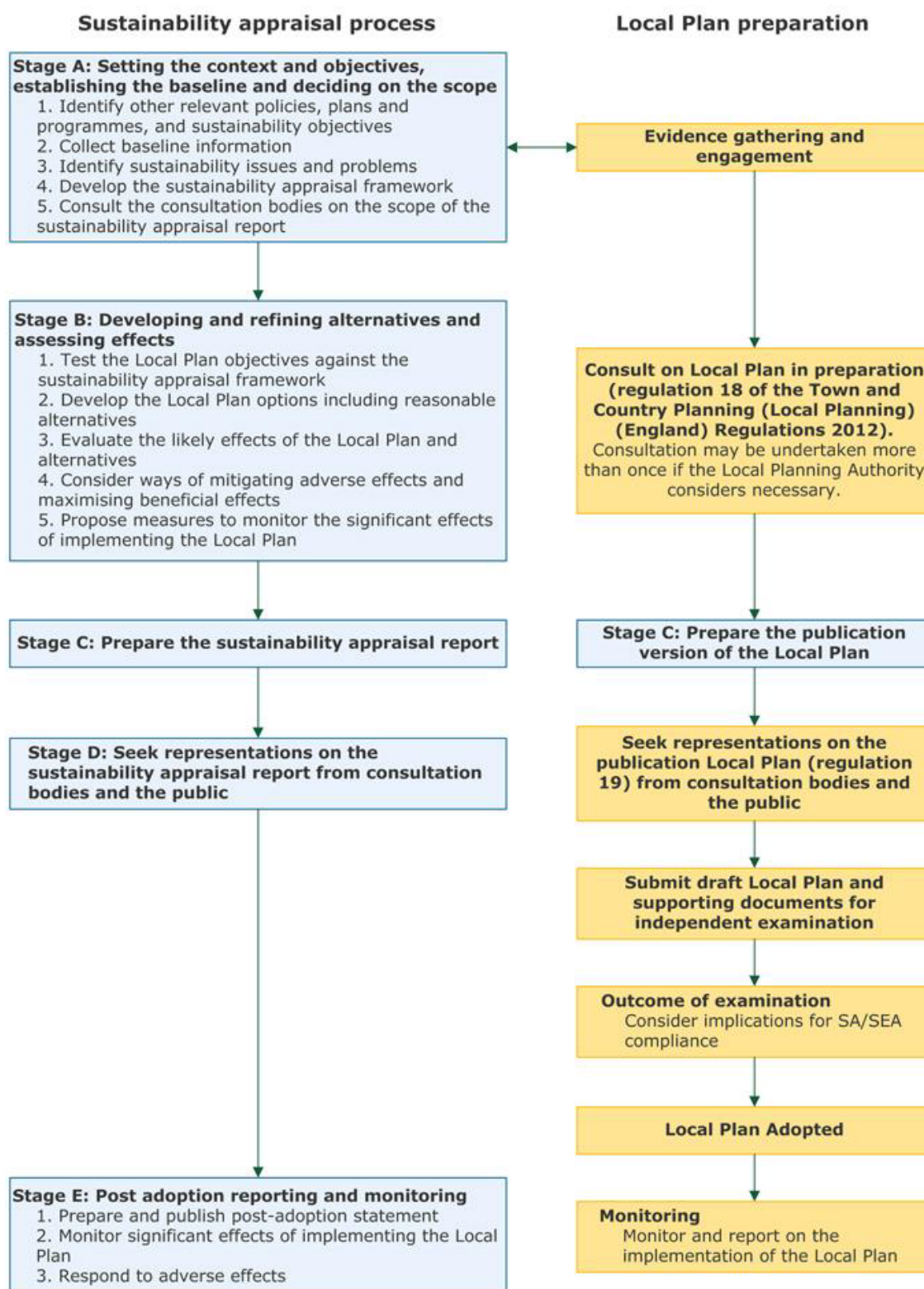
## **4.0 SUPPORTING DOCUMENTS**

- 4.1 This section outlines the range of supporting documents which will sit alongside the proposed Northampton Local Plan Part 2 and the West Northamptonshire Strategic Plan.

### **Sustainability Appraisal and Habitats Regulation Assessment**

- 4.2 Under the Planning and Compulsory Purchase Act 2004 the sustainability appraisal of development plans is mandatory. For the development plan it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment Directive (European Directive 2001/42/EC). Therefore, it is a legal requirement for local plans to be subject to SA and SEA throughout its preparation. The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process. The aim of the process is to appraise the social, environmental and economic effects of plan strategies and policies and ensure that they accord with the objectives of sustainable development.
- 4.3 The SA, incorporating the SEA, is being undertaken as an integral part of preparing the Local Plan and will help arrangements for monitoring and implementation. The SA process has the following five stages:
- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
  - Stage B: Developing and refining alternatives and assessing effects
  - Stage C: Prepare the sustainability appraisal report
  - Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public
  - Stage E: Post adoption reporting and monitoring
- 4.4 Under the Conservation of Habitats and Species Regulations 2010 (as amended) a Habitats Regulations Assessment (HRA) is required for any proposed plan or project which may have a significant effect on one or more European sites and which is not necessary for the management of those sites. The purpose of the HRA is to determine whether or not significant effects are likely and to suggest ways in which they could be avoided. The first stage is to carry out a screening process to establish if the local plan might have any likely significant effects on any European site and therefore to determine whether a full HRA would be required for the Plan. The screening will be undertaken at the same time as the issues and options stage (Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) of the plan's preparation.

4.5 Further details of how the SA and HRA processes relate to the local plan preparation stages are set out in the diagram below:



## **Policies Map**

- 4.2 A comprehensive West Northamptonshire policies and proposals map will geographically express the adopted local plan policies for West Northamptonshire as a whole. In accordance with regulation 9(1) of the regulations, a submission policies and proposals map will accompany the West Northamptonshire Strategic Plan and the Northampton Local Plan Part 2 to illustrate the geographical application of their policies. The adopted policies and proposals map will be revised as each new local plan is adopted, to ensure that it always reflects the up-to-date local plan policies for the West Northamptonshire area.

## **Authority Monitoring Report**

- 4.3 Following its approval, the LDS will be monitored on an annual basis in the West Northamptonshire Authority Monitoring Report (AMR).

## **Statement of Community Involvement**

- 4.4 The Statement of Community Involvement (SCI) sets out how the council will engage communities and stakeholders in the preparation of planning documents and the determination of planning applications. The predecessor councils of Daventry District, Northampton Borough and South Northamptonshire Councils have all produced SCIs.<sup>2</sup> A new SCI was produced in September 2021 specifically to deal with engagement on the strategic plan. The consultation and engagement to be undertaken in the preparation of the strategic plan will accord with this SCI.

## **Community Infrastructure Levy Charging Schedules**

- 4.5 The Community Infrastructure Levy (CIL) is a statutory way of collecting developer contributions to help fund infrastructure projects such as transport schemes and community facilities, to support new development in the area. Under the CIL arrangements local authorities can charge a locally set rate per square metre on many types of new development. The predecessor councils worked together on the proposals for CIL across West Northamptonshire, but each borough and district council retained its individual identity as a charging and collecting authority and retained control over the spending of CIL receipts.
- 4.6 During 2015 each of the predecessor councils approved CIL charging schedules and CIL charges have been operative across the whole of the West Northamptonshire area since April 2016. West

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<sup>2</sup> [Daventry District Council - Statement of Community Involvement](#) ; [Northampton Statement of Community Involvement](#) ; and [South Northamptonshire Council - Statement of Community Involvement](#)

Northamptonshire Council will consider whether a review of the CIL charging schedules is necessary having regard to the evidence base produced for the strategic plan.

## 5.0 PROGRAMME FOR PLAN PREPARATION

- 5.1 The programme for the preparation of the Northampton Local Plan Part 2 and the West Northamptonshire Strategic Plan is set out in the schedules below.

<b>Schedule 1 - Northampton Local Plan Part 2</b>	
Subject Matter	To set out site specific allocations for the former Northampton borough area including residential and employment uses. It will include policies against which planning applications for the development, management and use of land and buildings will be considered. It will include the identification, phasing and implementation of local infrastructure for sites. As an example the policy content will include boundaries of retail centres, historic conservation, open space and nature conservation policies and designations, highway issues and car parking. It will replace the Central Area Action Plan and saved policies from the 1997 Local Plan.
Geographical Area	Former Northampton Borough Area
Status	Development Plan Document
<b>Timetable for Production and Conformity with Appropriate Regulations</b>	
Formal Commencement of Preparation/ Consultation on the Scope of the Local Plan Part 2/ Call for Sites (Regulation 18)	September – October '15
Issues Consultation (Regulation 18)	April - June '16
Options Consultation (Regulation 18)	September – November '16
Sites Consultation (Regulation 18)	October - November '17
Publication of Draft Plan and Consultation (Regulation 19)	May '19 – June '19
Round 2 Publication of Draft Plan and Consultation (Regulation 19)	July '20 - September '20
Submission (Regulation 22)	February '21
Examination (Regulation 24)	November '21
Adoption (Regulation 26)	March '23
Management Arrangements	Assistant Director: Planning and Head of Planning Policy. Regular reports to Cabinet Member for Strategic Planning, Built Environment and Rural Affairs and Assistant Cabinet Members for Planning.

Resources Required	Planning Policy team; input from other Council services, neighbouring authorities, consultees, Programme Officer and Planning Inspectorate.
Monitoring and Review Mechanisms	Authority Monitoring Report
<b>Schedule 2 – West Northamptonshire Strategic Plan</b>	
Subject Matter	<p>To address the key strategic priorities for the area including:</p> <ul style="list-style-type: none"> <li>• <b>The spatial strategy</b> for the distribution of development.</li> <li>• <b>Climate change resilience</b> – as a cross cutting theme that runs through the plan’s strategy and policies.</li> <li>• <b>Place-shaping / sustainable development</b> – Key principles to ensure quality development and sustainable places.</li> <li>• <b>Natural and built environment</b> - the protection and enhancement of natural/built and historic assets and achieving net biodiversity gain.</li> <li>• <b>The housing requirement</b> – the number and type of new homes to be provided across West Northamptonshire and the proportion of the overall housing requirement that should be affordable.</li> <li>• <b>Economic growth</b> – Targets for the provision of jobs and employment land in West Northamptonshire and guidance on the strategic locations for new employment land to meet the jobs requirement. New policy guidance for town centres and retail development.</li> <li>• <b>Strategic infrastructure</b> – The key primary infrastructure projects that are required to deliver the strategy such as strategic transport schemes utility networks and community facilities.</li> <li>• <b>Health</b> - ensuring people can lead active lifestyles, including access to good quality open space, natural and semi natural greenspace and enjoy cleaner air.</li> <li>• <b>Strategic development locations and opportunities</b> – Key strategic sites that are crucial to the delivery of the spatial strategy will be identified in the Plan.</li> </ul>
Status	Development Plan Document (Local Plan)
Geographical Area	The whole of West Northamptonshire

<b>Timetable for Production and Conformity with Appropriate Regulations</b>	
Formal Commencement of Preparation/ Consultation on the Scope of the Local Plan Part 2/ Call for Sites (Regulation 18)	October 2018 – June 2019
Issues Consultation (Regulation 18)	August – October '19
Options Consultation (Regulation 18)	October – December '21
Draft Plan Consultation (Regulation 18)	June '23
Publication of Draft Plan and Consultation (Regulation 19)	December '23
Submission (Regulation 22)	May '24
Examination (Regulation 24)	December '24
Adoption (Regulation 26)	September '25
Management Arrangements	Assistant Director: Planning and Head of Planning Policy. Regular reports to Cabinet Member for Strategic Planning, Built Environment and Rural Affairs and Assistant Cabinet Members for Planning.
Resources Required	Planning Policy Team, input from other Council services, neighbouring authorities, consultees, Programme Officer and Planning Inspectorate.
Monitoring and Review Mechanisms	Authority Monitoring Report



**APPENDIX 1 – LOCAL DEVELOPMENT SCHEME TIMETABLE**

Timetable	2022		2023												2024												2025									
	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	
Northampton Local Plan Part 2					A																															
West Northants Strategic Plan								D						P					S							E									A	

**Key:**

- O – Consultation on Options (Reg 18)
- D – Consultation on Draft Plan (Reg 18)
- P- Publication of Proposed Submission Plan (Reg 19)
- S- Submission of Plan to Secretary of State (Reg 22)
- E – Commencement of Examination (Reg 24)
- A – Adoption (Reg 26)



# WEST NORTHAMPTONSHIRE COUNCIL

## PLANNING POLICY COMMITTEE

**25 October 2022**

**Councillor Rebecca Breese**

**Cabinet Member for Strategic Planning, Built Environment and Rural Affairs**

<b>Report Title</b>	<b>Northampton Local Plan Part 2:</b> Consultation on Further Main Modifications
<b>Report Author</b>	<p><b>Paul Everard</b>  <b>Planning Policy and Heritage Manager</b>  <b>paul.everard@westnorthants.gov.uk</b></p> <p><b>Noreen Banks</b>  <b>Planning Policy Team Leader</b>  <b>noreen.banks@westnorthants.gov.uk</b></p>

### Contributors/Checkers/Approvers

<b>West S151</b>	Martin Henry Executive Director, Finance	29 September 2022
<b>Director</b>	Stuart Timmiss Executive Director: Place, Economy & Environment	3 October 2022
<b>Legal</b>	Neil Weeks Legal	6 October 2022
<b>Communications</b>	Becky Hutson	29 September 2022

### List of Appendices

**Appendix A – Proposed Further Main Modifications;**  
**Appendix B – Addendum to Sustainability Appraisal;**  
**Appendix C – Addendum to Habitats Regulations Assessment;**  
**Appendix D – Consultation and Engagement Strategy.**

## 1. Purpose of Report

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- 1.1. The purpose of the report is to seek approval for public consultation on Further Main Modifications to the Northampton Local Plan Part 2.

## 2. Executive Summary

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- 2.1 The Northampton Local Plan Part 2 (the plan) was submitted to the Secretary of State for independent examination in February 2021. Government-appointed Inspectors conducted hearings about the Plan in November 2021. Following the hearings, proposals for modification to the plan and changes to the policies map were prepared to reflect the outcome of the hearing sessions and a note produced by the Inspectors following the close of the hearings.
- 2.2 The Proposed Main Modifications were necessary to make the plan sound and were released for public consultation in July 2022. Comments received were considered by the Inspectors who have subsequently recommended that consultation be undertaken on Further Main Modifications to the plan.

## 3. Recommendations

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- 3.1 It is recommended that Committee:
- a) Approves the Proposed Further Main Modifications to the Northampton Local Plan Part 2 for public consultation.
  - b) Approves the Consultation and Engagement Strategy
  - c) Delegates to the Assistant Director: Planning, in consultation with the Portfolio Holder for Planning, Built Environment and Rural Affairs, authority to make minor editorial and presentational changes to the consultation documents in their final published form.

## 4. Reason for Recommendations (NOTE: this section is **mandatory** and **must** be completed)

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- To accord with legislation on local plan preparation and to enable the plan to proceed towards adoption.

## 5. Report Background

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### INTRODUCTION

- 5.1 In January 2021, Northampton Borough Council approved the submission of the Northampton Local Plan Part 2 (the plan) for independent examination by the Planning Inspectorate. The plan contains policies which will be used to determine planning applications. It also includes site allocations, showing where sites for housing and employment developments are considered acceptable. The plan seeks to supplement and where necessary refine and supersede the strategic policies contained in the adopted West Northamptonshire Joint Core Strategy Local Plan Part 1, which was adopted in December 2014. This includes the requirement to deliver around 18,870 dwellings and contribute towards the creation of 28,500 new jobs from 2011 to 2029.

- 5.2 The plan was submitted to the Secretary of State for independent examination in February 2021. In March, the Council was informed that two Planning Inspectors had been appointed to conduct the examination into the plan. Part of the examination process includes the hearings, which were conducted in November 2021.
- 5.3 Following the conclusion of the hearings, the Inspectors concluded that the plan could be found legally compliant and sound subject to consultation on Main Modifications to the plan as well as the resolution of some matters highlighted during the hearings. In their post hearings letter, they outlined where modifications to the plan would be necessary to make the plan sound which is a key requirement of the National Planning Policy Framework. These recommendations were taken on board by Officers and developed into Proposed Modifications. The modifications (comprising Main Modifications, Additional Modifications and Proposed Changes to the Policies Map) were subject to public consultation between 7 July and 18 August 2022. The Sustainability Appraisal and Habitats Regulations Assessment were updated to take into account the modifications and these were also released for consultation.
- 5.4 All responses to the proposed main modifications were considered by the Planning Inspectors. Having reviewed these comments, the Planning Inspectors recommended that consultation be undertaken on further main modifications. The schedule of further main modifications can be found in detail in Appendix A, and they relate specifically to:
- Policy 41 (The Green, Great Houghton): following comments received from Homes England, parts x, xviii (c) and xviii (d) have been modified to provide clearer guidance on matters associated with traffic management and connectivity, and
  - Policy 43 (Ransome Road): Homes England submitted an objection to the previous proposed modification and requested that the capacity be reduced from 500 dwellings to about 230 of which 207 dwellings would be estimated to be completed by 2029. This has consequential changes to the plan's trajectory and the number of homes expected to be built through development plan allocations.
- 5.5 Addenda to the Sustainability Appraisal and Habitats Regulations Assessment have been produced to take account of these modifications. They will also be subject to consultation and are attached as Appendices B and C to this report.
- 5.6 In addition, the Council's Consultation and Engagement Strategy has been updated for this stage of the consultation (Appendix D).

## **NEXT STEPS**

- 5.7 If approved, it is envisaged that the Further Main Modifications consultation, will be released for public consultation from 7 November to 19 December 2022. This will be done in accordance with the Consultation and Engagement Strategy (Appendix D). Following the closure of the consultation, the Inspectors will consider any comments received. Provided there are no outstanding matters to consider for further consultation, the Inspectors will issue their Final Report. Subject to the outcome of the report, the Council would then be in a position to adopt the plan.

## **6. Issues and Choices**

---

### 6.1 Option 1: Agree the recommendations

6.2 The plan has been prepared to provide guidance on the implementation of strategic policies contained in the West Northamptonshire Joint Core Strategy, adopted in December 2014 and contains more detailed policies which will be used in the determination of planning applications. Part 2 plans have already been adopted for the Daventry and South Northamptonshire areas.

6.3 Consultation on these further main modifications is required, at the request of the Planning Inspectors, in order for the plan to be considered sound. If Members agree to release the Proposed Further Main Modifications for public consultation, this will ensure that progress continues to be made towards the adoption of the Northampton Local Plan Part 2. The timetabling of this process will need to be in conformity with the West Northamptonshire Local Development Scheme, an updated version of which is set out elsewhere on this agenda.

6.4 Adoption of this plan will ensure that Northampton, alongside Daventry and South Northamptonshire areas, will have an up to date Part 2 plan to deliver the strategy of the West Northamptonshire Joint Core Strategy. When the plan is adopted it will become part of the development plan for the Northampton area. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

### 6.5 Option 2: Not agree with the adoption

6.6 If Members choose not to approve a second round of consultation, progress on the Northampton Local Plan Part 2 will be halted. Northampton will remain as the only area within West Northamptonshire without an updated Part 2 plan. In determining planning applications for the Northampton area, the planning authority would have to continue to rely on policies which are likely to become out of date or national guidance which is generic and not locally specific.

## **7. Implications (including financial implications)**

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### **7.1 Resources and Financial**

7.1.1 The Council's costs will be met from existing budgets associated with the plan preparation process.

### **7.2 Legal**

7.2.1 The independent examination part of the local plan preparation process is set out in Section 24 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Once consultation on the Proposed Further Main Modifications is completed, and relevant comments are taken into account, provided there are no outstanding planning matters to consider for further consultation, the Planning Inspectors will prepare a report. Subject to the outcome of that report, the Council would then be in a position to adopt the plan.

### **7.3 Risk**

7.3.1 There are no significant risks arising from the proposed recommendations in this report.

### **7.4 Consultation**

7.4.1 The plan preparation process has and will continue to be undertaken in compliance with the regulations set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 and consultation forms a key element of the process. There are several stages that the plan has been through, namely the Issues stage (spring 2016), the Options stage (autumn 2016) and Proposed Submission stage (summer 2019 and summer 2020). The Proposed Modifications stage took place in July and August 2022. During each of these stages, local organisations and members of the public were consulted. Consultation was also undertaken with colleagues within the authority (including Development Management and Environmental Health), external stakeholders (such as the Environment Agency, Natural England, Historic England and Anglian Water), landowners (such as Network Rail) and developers. A similar exercise will be undertaken for the consultation on the proposed Further Main Modifications. It will also be undertaken in conformity with the Statement of Community Involvement for Northampton.

### **7.5 Consideration by Overview and Scrutiny**

7.5.1 Not applicable.

### **7.6 Climate Impact**

7.6.1 Policies in the plan, including those relating to flooding and sustainable construction, should assist in mitigating the effects of climate change.

### **7.7 Community Impact**

7.7.1 The plan will ensure that developments are directed to the right locations and that they are constructed in a manner that meets the required standards. It will ensure that a balance is secured between the built and natural environment, therefore continuing to supply houses and employment for existing and future residents whilst enhancing the quality and quantity of open spaces and protecting the area's heritage assets. All these will have a positive impact on the community.

### **7.8 Communications**

7.8.1 Communications played a key role throughout the local plan preparation process, particularly in publicising and encouraging participation in the consultation stages. The council will continue to keep the public and all other stakeholders informed and engaged throughout the local plan preparation process, in line with planning law, the Statement of Community Involvement for Northampton and the Consultation and Engagement Strategy. The council will continue to use its corporate communications channels including media releases and social media.

## **8. Background Papers**

- 8.1 Northampton Local Plan Part 2 Submission & Examination | Northampton Local Plan Part 2 Submission & Examination | West Northamptonshire Council - Northampton Area
- 8.2 EXAM 40 Inspectors Post Hearings Letter 24012022 | West Northamptonshire Council - Northampton Area
- 8.3 Northampton LPP2 Modifications Consultation - 7 July 2022 – 18 August 2022 | West Northamptonshire Council - Northampton Area



# **WEST NORTHAMPTONSHIRE COUNCIL**

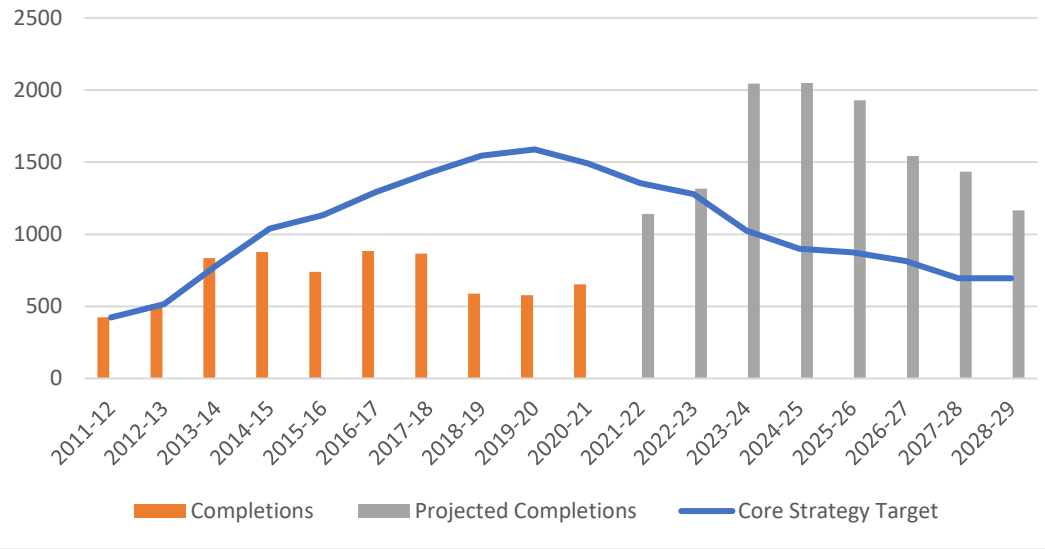
## **NORTHAMPTON LOCAL PLAN PART 2 SUBMISSION PLAN**

### **PROPOSED SCHEDULE OF FURTHER MAIN MODIFICATIONS NOVEMBER 2022**

The proposed Further Main Modifications relate only to the identified parts of the Main Modifications below.

<b>Further Main Modification reference</b>	<b>Main Modification reference</b>		<b>Reason for the FMM</b>
FMM1	MM11	<p><b>CHAPTER 7: RESIDENTIAL</b></p> <p>Adjust the following graphs and tables and the following part of Policy 13 to reflect the reduction in capacity of the Ransome Road site (LAA1139) in the plan period by 17 units. These changes supersede the corresponding changes in MM11. No other parts of MM11 are affected by this consultation.</p> <p>Graph 1: Housing delivery in Northampton against Joint Core Strategy proposed housing delivery trajectory</p>	<p>Reduction in the capacity of the Ransome Road site (LAA1139) submitted by landowner in response to the consultation on Main Modifications</p>

Actual Completions (2011-2021) & Projected Completions (2021-29) against JCS Target



Third section of Table 6: Housing commitments (including Joint Core Strategy allocations), proposed allocations and windfall

Source	Net additional dwellings
Completions	6,957
Existing commitments as at 1 <sup>st</sup> April 2021	1,889
Windfall allowance	1,800
Sustainable Urban Extensions	4,832
Allocations	<u>3,821</u>
Total	<u>19,299</u>

Paragraph 7.11

		<p>Sites have been allocated in this Plan to deliver about <del>3,804</del> <u>3,821</u> new dwellings. Appendix A shows the trajectory for sites allocated in the Local Plan Part 2, which excludes the SUEs and sites already committed through planning approvals. The sites below are allocated on the Policies Map for housing and residential-led mixed use development.</p> <p><b>POLICY 13 RESIDENTIAL AND OTHER RESIDENTIAL LED ALLOCATION</b></p> <p>1139 Ransome Road 200 <del>(500 in 5YHLS)</del> <u>230</u> (A minimum of 207 of which will be provided within the plan period)</p>	
FMM2	MM37	<p><b>POLICY 41 THE GREEN, GREAT HOUGHTON (LAA1098)</b></p> <p><b>Amend the following parts of Policy 41 – this supersedes the corresponding parts of MM37 (no other parts of MM37 are affected by this consultation) to:</b></p> <p>x. <del>Any p</del> <del>Proposals that comes forward</del> should include suitable measures to mitigate the impact of additional traffic generated by the development. <u>The principal access to the site should be from The Green west of Saucebridge Farm, west of the junction of The Green with the unnamed road which leads south at this point, and the development should seek to minimise additional traffic eastwards from this point towards Great Houghton village and the Bedford Road. The intention should be to reduce the potential for traffic to use The Green to the east or routes through the allocation to travel between the Newport Pagnell Road and the Bedford Road or vice versa.</u></p> <p>xviii c. <u>Manage and control vehicular access to and from the site to the northern/eastern section of The Green near to the village of Great Houghton, and minimise traffic arising from the development passing through Great Houghton.</u></p> <p><del>xix:</del> xviii d) <u>Connect the site to nearby Brackmills Country Park and surrounding areas including pedestrian and cycling provision to secure connectivity and permeability within the site, to the employment area to the north, the proposed residential area to the west along The Green and towards Great Houghton as shown on figure 20.</u></p>	To clarify access and traffic arrangements.

FMM3	MM38	<p><b>POLICY 43 RANSOME ROAD (LAA1139)</b></p> <p><b>Amend the following part of Policy 43 – this supersedes the corresponding part of MM38 no other parts of MM11 are affected by this consultation :</b></p> <p>A.Ransome Road will be developed for <del>at least 200</del> <u>about 230 dwellings</u>, with <u>207 dwellings to be provided in the plan period</u>.....</p>	Reduction in the capacity of the Ransome Road site (LAA1139) submitted by landowner in response to the Main Modifications consultation.																																																												
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**West Northamptonshire Council**

**Sustainability Appraisal**  
**Further Main Modifications**  
**to the Northampton Local**  
**Plan Part 2**

**Final report**

Prepared by LUC

September 2022

**West Northamptonshire Council**

**Sustainability Appraisal**  
**Further Main Modifications to the Northampton**  
**Local Plan Part 2**

Version	Status	Prepared	Checked	Approved	Date
1.	Final report	S. Temple	J. Pearson	J. Pearson	27.09.2022

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 Historic Environment  
 GIS & Visualisation





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<b>Appendix A</b>	
<b>Schedule of further main modifications with SA implications</b>	<b>A-1</b>

## Introduction

**1.1** LUC has undertaken Sustainability Appraisal (SA) of the Northampton Local Plan (Part 2) throughout its preparation. The Local Plan (Part 2) was submitted for Examination by Northampton Borough Council (now West Northamptonshire Council; WNC) in February 2021. Following Examination, WNC proposed Main Modifications, which were assessed in an SA Addendum report in June 2022. WNC now proposes Further Main Modifications (September 2022; as set out in **Appendix A**).

**1.2** This SA Addendum presents the SA of the proposed four further main modifications to the Local Plan Part 2 and considers their implications for the SA findings reported previously. Together with the June 2020 SA Report at Proposed Submission stage and the subsequent addendum reports and erratum listed below, this addendum represents an appraisal of the Local Plan Part 2 as proposed to be further modified, updating the findings that were previously presented in those documents. This SA Addendum should therefore be read alongside the June 2020 SA Report and those subsequent SA documents.

## SA work to date

**1.3** There have been nine key stages in the SA of the Northampton Local Plan (Part 2) to date:

- An SA Scoping Report was published for consultation in March 2016.
- An SA Report that accompanied the Options Consultation Paper was published for consultation in August 2016.
- An SA Report that accompanied the Site Options document was published for consultation in September 2017.
- An SA Report that accompanied the Proposed Submission Local Plan Part 2 was published for Regulation 19 (Round 1) consultation in April 2019.
- An SA Report that accompanied the Proposed Submission Local Plan Part 2 was published for Regulation 19 (Round 2) consultation in June 2020.
- An SA Addendum was produced in June 2020 to clarify the appraisal findings in relation to the allocation by Policy 26 of Land adjoining Dallington Cemetery.
- An Erratum to Appendix D of the Regulation 19 (Round 2) SA Report was produced in October 2020 to flag that Appendix D incorrectly stated that site LAA0204: The

Farm was a non-allocated site option when in fact it was allocated.

- An SA Addendum was produced in November 2021 to appraise the revised boundary of the site allocation at The Green, Great Houghton (LAA1098), to include Hardingstone Lodge (LAA1098B).
- A Main Modifications SA Addendum was produced in June 2022 to appraise the proposed Main Modifications to the Northampton Local Plan Part 2.

## Proposed Further Main Modifications (FMMs)

**1.4** The four proposed FMMs (**Appendix A**) relate to two main changes:

- A reduction for the number of new dwellings to be provided by 2029 at site LAA1139 Ransome Road of 17 homes, and a corresponding reduction in homes proposed in the Local Plan (when compared with the Main Modifications version of the Local Plan); and
- Amendments to Policy 41 The Green, Great Houghton (LAA1098), relating to car, bicycle and pedestrian access to the proposed development.

## Methodology

**1.5** The approach to assessing the SA implications of the proposed further main modifications involved considering each further modification as set out in the Schedule of Further Main Modifications. A column was added to the Schedule of Further Main Modifications to consider and record whether the proposed further modification would be likely to change the SA findings presented in the June 2020 SA Report and subsequent erratum and addendum reports, including the June 2022 Main Modifications SA Addendum. The Schedule of Further Main Modifications with the additional SA implications column is presented in **Appendix A** of this SA Addendum.

### SA framework

**1.6** The likely effects of the proposed further main modifications were appraised in relation to the sustainability objectives set out in the SA framework, provided in Table 1.1 of the June 2022 addendum. Appendix D of the same Addendum outlines the criteria used to guide site assessments.

**1.7** Since the publication of the Main Modifications SA Addendum in June 2022, there have been no significant

changes to the evidence base or policy context of relevance to the SA of the further main modifications.

## Summary of SA findings

**1.8** As outlined in **Appendix A**, the proposed further main modifications will not alter any of the SA findings previously recorded in the 2020 SA Report and the subsequent addendum reports and erratum, including the June 2022 Main Modifications SA Addendum.

## Summary of HRA findings

**1.9** The Local Plan (Part 2) has been subject to a separately reported Habitats Regulations Assessment (HRA). The HRA has been updated to consider the effects of the further main modifications. This found that the proposed further main modifications will not alter the findings of the June 2022 Main Modifications version of the HRA that adverse effects on the integrity of European sites can be ruled out.

## Cumulative effects

**1.10** This Further Main Modifications SA Addendum has identified no changes to the sustainability effects of the Northampton Local Plan Part 2. Therefore, there will be no changes to the overall cumulative effects reported in the June 2022 SA Report and the subsequent addendum reports and erratum, including the June 2022 Main Modifications SA Addendum.

LUC

September 2022

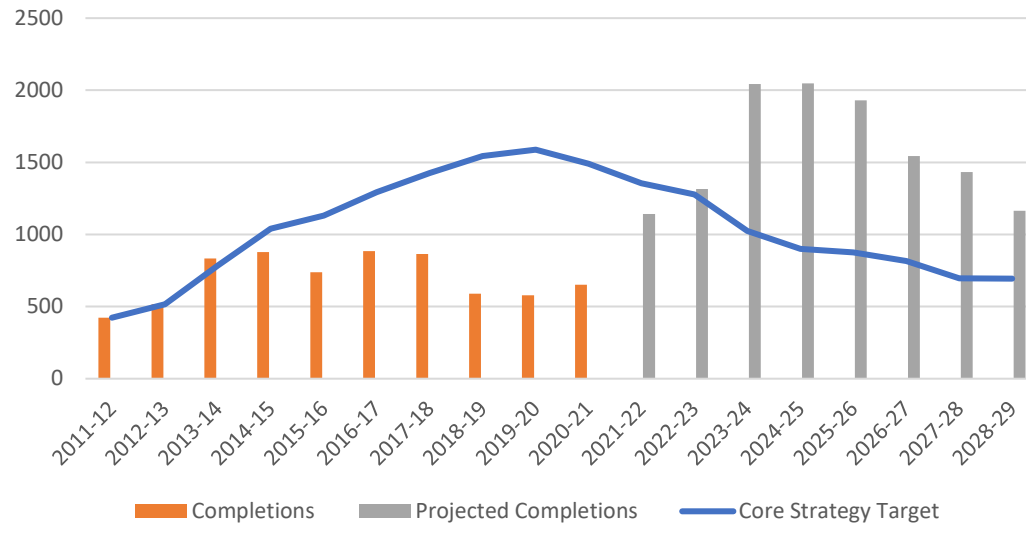
## **Appendix A**

### **Schedule of further main modifications with SA implications**

The proposed Further Main Modifications relate only to the identified parts of the Main Modifications below.

Further Main Modification reference	Main Modification reference	Suggested Modification	Reason for the FMM	Implications for the SA findings
FMM1	MM11	<p><b>CHAPTER 7: RESIDENTIAL</b></p> <p>Adjust the following graphs and tables and the following part of Policy 13 to reflect the reduction in capacity of the Ransome Road site (LAA1139) in the plan period by 17 units. These changes supersede the corresponding changes in MM11. No other parts of MM11 are affected by this consultation.</p> <p>Graph 1: Housing delivery in Northampton against Joint Core Strategy proposed housing delivery trajectory</p>	<p>Reduction in the capacity of the Ransome Road site (LAA1139) submitted by landowner in response to the consultation on Main Modifications</p>	<p><b>No change to SA findings:</b> This proposed Further Main Modification will not alter the findings of the SA because although the site capacity of Ransome Road (LAA1139) has decreased by 17 dwellings from 224 to 207 (the total dwelling capacity of the Plan has coincidentally decreased by 17 from 3,821 to 3,804), the Ransome Road site is still expected to have a significant positive effect in relation to SA objective 1: housing. This is in accordance with the site assessment criteria whereby any site that delivers 100 dwellings or more receives a significant positive effect.</p> <p>As explained in the June 2020 SA Report and June 2022 Main Modifications SA Addendum, Policy 13 lists the residential site allocations and does not place any additional requirements on them. Therefore, Policy 13 was not appraised in its own right by the</p>

Actual Completions (2011-2021) & Projected Completions (2021-29) against JCS Target



Third section of Table 6: Housing commitments (including Joint Core Strategy allocations), proposed allocations and windfall

Source	Net additional dwellings
Completions	6,957
Existing commitments as at 1 <sup>st</sup> April 2021	1,889
Windfall allowance	1,800
Sustainable Urban Extensions	4,832
Allocations	<u>3,821</u>
<b>Total</b>	<b>19,299</b>

SA. Instead, each site allocated by Policy 13 is separately appraised on a 'policy-off' basis.

		<p>Paragraph 7.11</p> <p>Sites have been allocated in this Plan to deliver about <del>3,804</del> <u>3,821</u> new dwellings. Appendix A shows the trajectory for sites allocated in the Local Plan Part 2, which excludes the SUEs and sites already committed through planning approvals. The sites below are allocated on the Policies Map for housing and residential-led mixed use development.</p> <p><b>POLICY 13</b>  <b>RESIDENTIAL AND OTHER RESIDENTIAL LED ALLOCATION</b></p> <p>1139 Ransome Road  <del>200 (500 in 5YHLS)</del> <u>230 (A minimum of 207 of which will be provided within the plan period)</u></p>		
FMM2	MM37	<p><b>POLICY 41</b>  <b>THE GREEN, GREAT HOUGHTON (LAA1098)</b></p> <p><b>Amend the following parts of Policy 41 – this supersedes the corresponding parts of MM37 (no other parts of MM37 are affected by this consultation) to:</b></p> <p>x. <del>Any p</del> <del>Proposals that comes forward</del> should include suitable measures to mitigate the impact of additional traffic generated by the development. <u>The principal access to the site should be from The Green west of Saucebridge Farm, west of the junction of The Green with the unnamed road which leads south at this point, and the development should seek to minimise additional traffic eastwards from this point towards Great Houghton village and the Bedford Road. The intention should be to reduce the potential for traffic to use The Green to the east or routes through the allocation to travel between the Newport Pagnell Road and the Bedford Road or vice versa.</u></p>	To clarify access and traffic arrangements.	<p><b>No change to SA findings:</b> This proposed Further Main Modification will not alter the findings of the SA because although the vehicular access to the site has changed, the policy still seeks to provide suitable transport links to neighbouring developments including Great Houghton, the Brackmills Country Park and employment area to the north, helping to facilitate sustainable modes of travel and minimise greenhouse gas</p>

		<p>xviii c. <u>Manage and control vehicular access to and from the site to the northern/eastern section of The Green near to the village of Great Houghton, and minimise traffic arising from the development passing through Great Houghton.</u></p> <p><del>xix.</del> xviii d) <u>Connect the site to nearby Brackmills Country Park and surrounding areas including pedestrian and cycling provision to secure connectivity and permeability within the site, to the employment area to the north, the proposed residential area to the west along The Green and towards Great Houghton as shown on figure 20.</u></p>		<p>emissions. A minor positive effect is therefore still expected in relation to SA objectives 2: sustainable travel and 8: climate change mitigation. A minor negative effect is still expected in relation to SA objective 12: air quality due to the large nature of the site and increase in commuters by car.</p>
FMM3	MM38	<p><b>POLICY 43</b></p> <p><b>RANSOME ROAD (LAA1139)</b></p> <p><b>Amend the following part of Policy 43 – this supersedes the corresponding part of MM38 no other parts of MM11 are affected by this consultation :</b></p> <p>A.Ransome Road will be developed for <del>at least 200</del> <u>about 230 dwellings, with 207 dwellings to be provided in the plan period.....</u></p>	<p>Reduction in the capacity of the Ransome Road site (LAA1139) submitted by landowner in response to the Main Modifications consultation.</p>	<p>See FMM1.</p>
FMM4	MM44	<p>Adjust the following line in appendix A to reflect the reduction in capacity of the Ransome Road site (LAA1139) in the plan period by 17 units. These changes supersede the corresponding changes in MM44. No other parts of MM44 are affected by this consultation.</p> <p>Appendix A: Northampton housing trajectory for sites allocated in the Local Plan Part 2 (excluding Sustainable Urban Extensions)</p>	<p>Consequential change following reduction in the capacity of the Ransome Road site (LAA1139) submitted by landowner in response to the</p>	<p>See FMM1.</p>



Appendix A  
 Schedule of further main modifications with SA implications

Sustainability Appraisal  
 September 2022

Ref	Site Name	Yield in policy 13	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	TOTAL in policy 13	Main Modifications consultation.
1139	Ransome Road	200 (HLS) 230				52	52	52	51		0207	
	<b>SUB TOTAL</b>		<b>479 421</b>	<b>545 401</b>	<b>578 800</b>	<b>407 567</b>	<b>373 642</b>	<b>377 462</b>	<b>384 313</b>	<b>382 215</b>		
	<b>TOTAL</b>	<b>5215</b>									<b>3804</b> <b>3821</b>	

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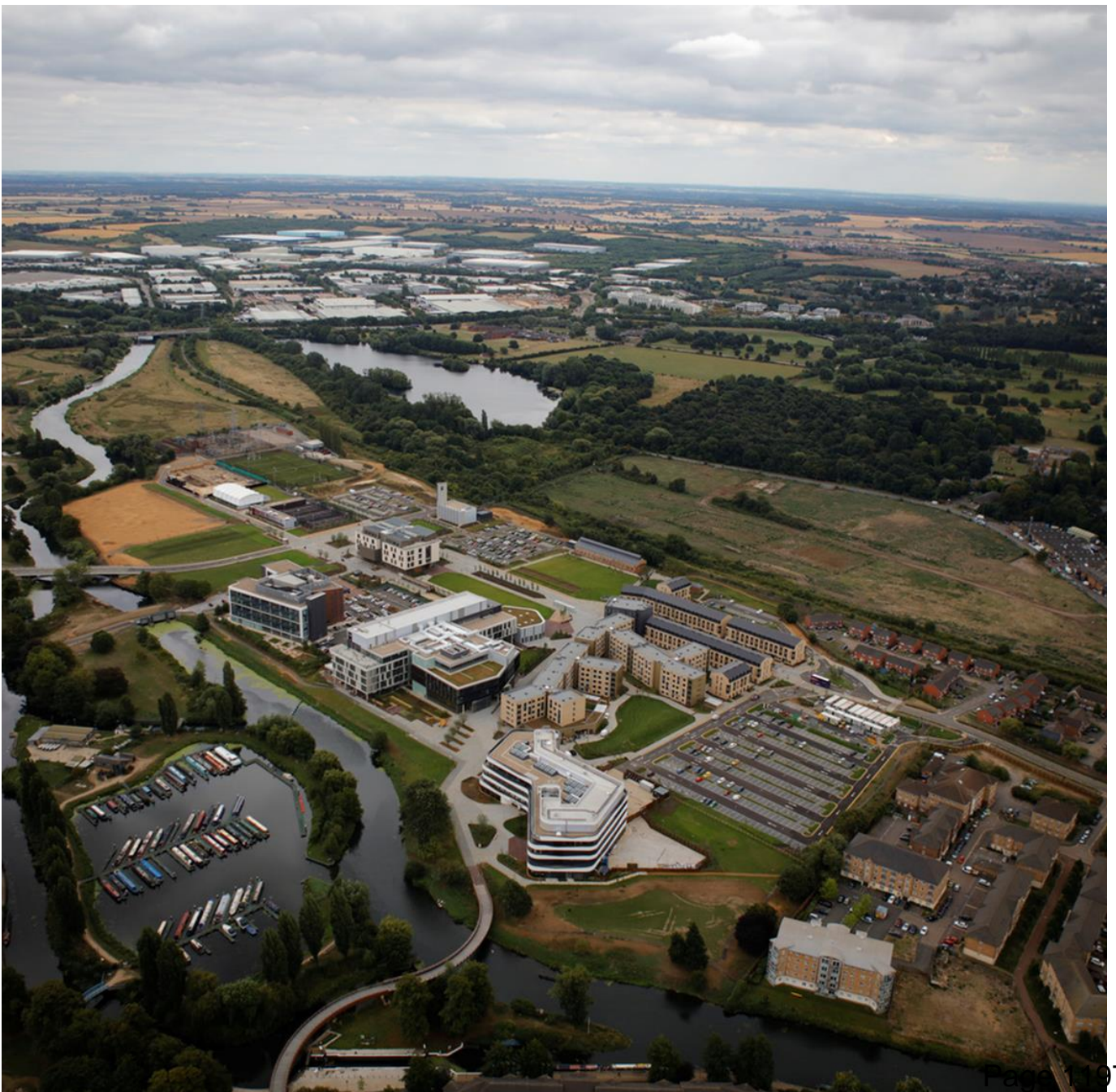
**West Northamptonshire Council**

# **Local Plan (Part 2) - Further Main Modifications Habitats Regulations Assessment addendum**

**Final report**

Prepared by LUC

September 2022



**West Northamptonshire Council**

**Local Plan (Part 2) - Further Main Modifications**  
**Habitats Regulations Assessment addendum**

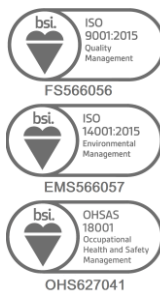
**Project Number**  
 5823

Version	Status	Prepared	Checked	Approved	Date
1.	Draft addendum	K Sydney	J Pearson	J Pearson	27.09.2022
2.	Final addendum	K Sydney	J Pearson	J Pearson	30.09.2022

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 Landscape Management  
 Ecology  
 Historic Environment  
 GIS & Visualisation



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# Chapter 1

## Introduction

**1.1** LUC undertook a Habitats Regulations Assessment (HRA) of the Northampton Local Plan (Part 2), in June 2020. The Local Plan (Part 2) was submitted for Examination by Northampton Borough Council (now West Northamptonshire Council; WNC) in February 2021. Following Examination, WNC proposed Main Modifications, which were assessed in an updated version of the HRA report in June 2022. WNC now proposes Further Main Modifications (September 2022; as set out in **Appendix A**).

**1.2** This addendum assesses the implications of the Further Main Modifications for the findings set out in the June 2022 HRA Report, and should be read alongside that.

### Proposed Further Main Modifications (FMMs)

**1.3** The four proposed FMMs (**Appendix A**) relate to two main changes:

- A reduction for the number of new dwellings to be provided by 2029 at site LAA1139 Ransome Road of 17 homes, and a corresponding reduction in homes proposed in the Local Plan (when compared with the Main Modifications version of the Local Plan); and
- Amendments to Policy 41 The Green, Great Houghton (LAA1098), relating to car, bicycle and pedestrian access to the proposed development.

## Chapter 2

# Assessment of Proposed Further Main Modifications

### Reduction in capacity at Ransome Road

**2.1** The reduction in the number of dwellings to be provided at LAA1139 Ransome Road over the period to 2029 of 17 homes will not alter the findings of the June 2022 HRA.

**2.2** LAA1139 is c.1.9km from the Upper Nene Valley SPA/Ramsar and therefore its potential to contribute to non-physical disturbance or recreation pressure at the SPA/Ramsar was assessed. The HRA concluded that the allocated site is unlikely to contribute to non-physical disturbance due to the presence of main roads and urban areas between it and the European site. The change in housing capacity does not affect this.

**2.3** As LAA1139 allocates housing within 3km of the SPA/Ramsar, it will require developer contributions to strategic mitigation to ensure that it will not have an adverse effect on the SPA/Ramsar due to recreation pressure. The change in capacity reduces the number of homes and therefore the mitigation contribution required but does not change the HRA findings.

**2.4** The reduction in capacity at LAA1139 reduces the overall number of homes proposed in the Local Plan from 3,838 (compared to the Main Modifications Local Plan and as assessed in the June 2022 HRA) to 3,821.

**2.5** This will slightly reduce impacts that relate to the overall quantum of development, such as changes in water quality or air quality, but not to an extent that the HRA conclusions (no adverse effects on integrity) need to be altered.

### Changes to access at The Green, Great Houghton

**2.6** The proposed FMM specifies that access to The Green must be from the west of Saucebridge Farm. Although this may alter patterns of traffic flow on local roads when compared with access from other directions, this will not alter the findings of the HRA. The HRA concluded that the Upper Nene Valley Gravel Pits SPA and Ramsar site is not considered to be sensitive to air pollution to a degree that changes in traffic due to the Local Plan Part 2 would result in adverse effects on its integrity. The proposed FMM to Policy 41 would not change this.

## Chapter 2

### Assessment of Proposed Further Main Modifications

Local Plan (Part 2) - Further Main Modifications  
September 2022

**2.7** The principle of connecting the site to Brackmills Country Park has already been assessed in the HRA as part of the Main Modifications.



## Chapter 3

### Conclusions

**3.1** The proposed FMMs will not alter the findings of the HRA (June 2022).

LUC

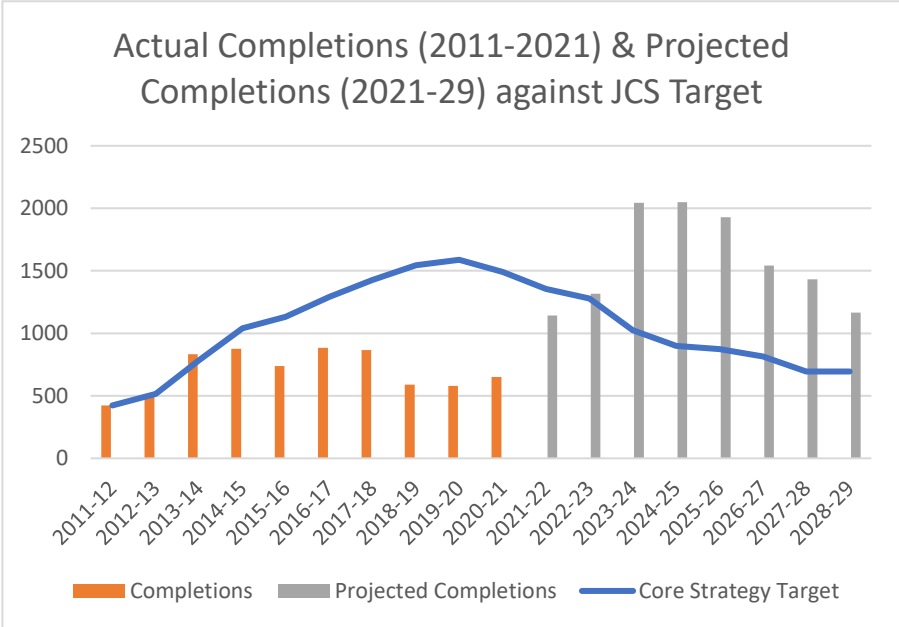
September 2022

## Appendix A

### Proposed Further Main Modifications

**A.1** The following table sets out the Further Main Modifications proposed by WNC and the reason for them.

**A.2** The overall number of homes proposed by the Local Plan has reduced from 3,838 (as set out in the Main Modifications) to 3,821. This is a reduction of 17 when compared with the Submission version of the Local Plan.

Further Main Modification reference	Main Modification reference		Reason for the FMM
FMM1	MM11	<p><b>CHAPTER 7: RESIDENTIAL</b></p> <p>Adjust the following graphs and tables and the following part of Policy 13 to reflect the reduction in capacity of the Ransome Road site (LAA1139) in the plan period by 17 units. These changes supersede the corresponding changes in MM11. No other parts of MM11 are affected by this consultation.</p> <p>Graph 1: Housing delivery in Northampton against Joint Core Strategy proposed housing delivery trajectory</p>  <p>The chart displays housing delivery in Northampton against the Joint Core Strategy (JCS) target. The Y-axis represents the number of completions, ranging from 0 to 2500. The X-axis shows years from 2011-12 to 2028-29. The blue line represents the Core Strategy Target, which starts at approximately 400 in 2011-12, rises to a peak of about 1600 in 2020-21, and then gradually declines to around 700 by 2028-29. Orange bars represent actual completions from 2011-12 to 2020-21, showing a similar upward trend to the target but with some fluctuations. Grey bars represent projected completions from 2021-22 to 2028-29, which are generally higher than the target, peaking at over 2000 in 2024-25 and 2025-26.</p>	<p>Reduction in the capacity of the Ransome Road site (LAA1139) submitted by landowner in response to the consultation on Main Modifications</p>

		<p>Third section of Table 6: Housing commitments (including Joint Core Strategy allocations), proposed allocations and windfall</p> <table border="1" data-bbox="454 352 1682 576"> <thead> <tr> <th>Source</th> <th>Net additional dwellings</th> </tr> </thead> <tbody> <tr> <td>Completions</td> <td>6,957</td> </tr> <tr> <td>Existing commitments as at 1<sup>st</sup> April 2021</td> <td>1,889</td> </tr> <tr> <td>Windfall allowance</td> <td>1,800</td> </tr> <tr> <td>Sustainable Urban Extensions</td> <td>4,832</td> </tr> <tr> <td>Allocations</td> <td><u>3,821</u></td> </tr> <tr> <td>Total</td> <td><u>19,299</u></td> </tr> </tbody> </table> <p>Paragraph 7.11</p> <p>Sites have been allocated in this Plan to deliver about <del>3,804</del> <u>3,821</u> new dwellings. Appendix A shows the trajectory for sites allocated in the Local Plan Part 2, which excludes the SUEs and sites already committed through planning approvals. The sites below are allocated on the Policies Map for housing and residential-led mixed use development.</p> <p><b>POLICY 13</b></p> <p><b>RESIDENTIAL AND OTHER RESIDENTIAL LED ALLOCATION</b></p> <p>1139 Ransome Road</p> <p><del>200 (500 in 5YHLS)</del> <u>230</u> (A minimum of 207 of which will be provided within the plan period)</p>	Source	Net additional dwellings	Completions	6,957	Existing commitments as at 1 <sup>st</sup> April 2021	1,889	Windfall allowance	1,800	Sustainable Urban Extensions	4,832	Allocations	<u>3,821</u>	Total	<u>19,299</u>	
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FMM2	MM37	<p><b>POLICY 41</b></p> <p><b>THE GREEN, GREAT HOUGHTON (LAA1098)</b></p> <p><b>Amend the following parts of Policy 41 – this supersedes the corresponding parts of MM37 (no other parts of MM37 are affected by this consultation) to:</b></p> <p>x. <del>Any p</del> <del>Proposals that comes forward</del> should include suitable measures to mitigate the impact of additional traffic generated by the development. <u>The principal access to the site should be from The Green west of Saucebridge Farm, west of the junction of The Green with the unnamed road which leads south at this point, and the development should seek to minimise additional traffic eastwards from this point towards Great Houghton village and the Bedford Road. The intention should be to reduce the potential for traffic to use The Green to the east or routes through the allocation to travel between the Newport Pagnell Road and the Bedford Road or vice versa.</u></p>	To clarify access and traffic arrangements.														

		<p>xviii c. <u>Manage and control vehicular access to and from the site to the northern/eastern section of The Green near to the village of Great Houghton, and minimise traffic arising from the development passing through Great Houghton.</u></p> <p><del>xix</del> xviii d) <u>Connect the site to nearby Brackmills Country Park and surrounding areas including pedestrian and cycling provision to secure connectivity and permeability within the site, to the employment area to the north, the proposed residential area to the west along The Green and towards Great Houghton as shown on figure 20.</u></p>																																																	
FMM3	MM38	<p><b>POLICY 43</b></p> <p><b>RANSOME ROAD (LAA1139)</b></p> <p><b>Amend the following part of Policy 43 – this supersedes the corresponding part of MM38 no other parts of MM11 are affected by this consultation :</b></p> <p>a. Ransome Road will be developed for <del>at least 200</del> <u>about 230 dwellings, with 207 dwellings to be provided in the plan period.....</u></p>	Reduction in the capacity of the Ransome Road site (LAA1139) submitted by landowner in response to the Main Modifications consultation.																																																
FMM4	MM44	<p>Adjust the following line in appendix A to reflect the reduction in capacity of the Ransome Road site (LAA1139) in the plan period by 17 units. These changes supersede the corresponding changes in MM44. No other parts of MM44 are affected by this consultation.</p> <p>Appendix A: Northampton housing trajectory for sites allocated in the Local Plan Part 2 (excluding Sustainable Urban Extensions)</p> <table border="1"> <thead> <tr> <th>Ref</th> <th>Site Name</th> <th>Yield in policy 13</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> <th>2026/27</th> <th>2027/28</th> <th>2028/29</th> <th>TOTAL in policy 13</th> </tr> </thead> <tbody> <tr> <td>1139</td> <td>Ransome Road</td> <td><del>200</del> (HLS) <u>230</u></td> <td></td> <td></td> <td></td> <td><u>52</u></td> <td><u>52</u></td> <td><u>52</u></td> <td><u>51</u></td> <td></td> <td><u>0207</u></td> </tr> <tr> <td></td> <td><b>SUB TOTAL</b></td> <td></td> <td><b><u>479 421</u></b></td> <td><b><u>545 401</u></b></td> <td><b><u>578 800</u></b></td> <td><b><u>407 567</u></b></td> <td><b><u>373 642</u></b></td> <td><b><u>377 462</u></b></td> <td><b><u>381 313</u></b></td> <td><b><u>382 215</u></b></td> <td></td> </tr> <tr> <td></td> <td><b>TOTAL</b></td> <td><b><u>5215</u></b></td> <td colspan="7"></td> <td></td> <td><b><u>3804 3821</u></b></td> </tr> </tbody> </table>	Ref	Site Name	Yield in policy 13	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	TOTAL in policy 13	1139	Ransome Road	<del>200</del> (HLS) <u>230</u>				<u>52</u>	<u>52</u>	<u>52</u>	<u>51</u>		<u>0207</u>		<b>SUB TOTAL</b>		<b><u>479 421</u></b>	<b><u>545 401</u></b>	<b><u>578 800</u></b>	<b><u>407 567</u></b>	<b><u>373 642</u></b>	<b><u>377 462</u></b>	<b><u>381 313</u></b>	<b><u>382 215</u></b>			<b>TOTAL</b>	<b><u>5215</u></b>									<b><u>3804 3821</u></b>	Consequential change following reduction in the capacity of the Ransome Road site (LAA1139) submitted by landowner in response to the Main Modifications consultation.
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**CONSULTATION & ENGAGEMENT STRATEGY  
NORTHAMPTON LOCAL PLAN (PART 2)  
FURTHER MAIN MODIFICATIONS  
October 2022**

The Consultation and Engagement Strategy sets out the arrangements for communication and consultation with the local community and all other relevant stakeholders in respect of the Further Main Modifications consultation. The consultation will cover the following documents:

- Proposed Further Main Modifications to the Plan
- Addendum to the Sustainability Appraisal
- Addendum to the Habitats Regulations Assessment

**Comments received must relate only to the Further Main Modifications and/or the addenda. Any other comments not related to the above cannot be considered.**

The strategy meets statutory requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Statement of Community Involvement for Northampton.

<b>Timing</b>	<b>Actions</b>
Nov – Dec 2022	<p>Two press releases:</p> <ul style="list-style-type: none"> <li>• one just prior to the Planning Policy Committee papers being made public, week commencing 17 October 2022 and</li> <li>• week commencing 7 November 2022</li> </ul> <p>Social media communications on the Council's Twitter and Facebook.</p> <p>Frequently Asked Questions for external use to be placed on the website.</p>
7 Nov – 19 Dec 2022 (During consultation)	<p>All consultation documents to be made available at the Inspection locations (the One Stop Shop at the Guildhall, all publicly owned libraries in Northampton).</p> <p>All consultation documents to be made available for review/download with on-line response facility available on the WNC website.</p> <p>Send emails or letters explaining the consultation and providing details of how to respond sent to specific consultation bodies<sup>1</sup>, the</p>

<sup>1</sup> The specific consultation bodies are listed in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and relate to organisations responsible for services and utilities and infrastructure provision.

	<p>general consultation bodies<sup>2</sup>, neighbouring authorities, prescribed bodies<sup>3</sup> and other organisations and individuals as appropriate.</p> <p>Paper copies of consultation documents to be made available at Town and Parish Council offices and other community offices in Northampton where possible.</p> <p>Paper copies of consultation documents to be made available on request.</p> <p>Anyone who wishes to speak to a member of staff in person can do so by arranging an appointment, by emailing:</p> <ul style="list-style-type: none"> <li>• <a href="mailto:planningpolicy.nbc@westnorthants.gov.uk">planningpolicy.nbc@westnorthants.gov.uk</a></li> <li>• or by calling 0300 126 7000 (choose Planning option)</li> </ul>
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<sup>2</sup> The general consultation bodies are also specified in Regulation 2 of the 2012 Regulations and comprise:  
voluntary bodies some or all of whose activities benefit any part of the local planning authority's area  
bodies which represent the interests of:

- different racial, ethnic or national groups in the local authority's area
- different religious groups in the local planning authority's area
- disabled people in the local planning authority's area
- persons carrying on business in the local planning authority's area

<sup>3</sup> The prescribed bodies are specified in Regulation 4 of the 2012 Regulations (as amended) and in the case of Northampton are:  
Environment Agency, Historic England, Natural England, Civil Action Authority, Homes and Communities Agency, NHS, Office of Rail Regulation, Highways England, Northamptonshire County Council Highways, South East Midlands Local Enterprise Partnership, Northamptonshire Local Nature Partnership