

Land to the east of Tiffield Road and to the north west
of the A43 Towcester

S/2020/1644/EIA

Case Officer: Andrew Longbottom

Applicant: IM Properties PLC

Proposal: 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 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)

Ward: Towcester Mill and Easton Neston

Councillors: Cllr Chris Lofts & Cllr Catharine Tarbun

Reason for Referral: Major development

Expiry Date: 20 January 2021 **Committee Date:** 7 January 2021

EXECUTIVE SUMMARY OF PROPOSALS AND RECOMMENDATION

RECOMMENDATION – TO DELEGATE TO THE ASSISTANT DIRECTOR FOR PLANNING AND ECONOMY TO GRANT PERMISSION, SUBJECT TO THE FOLLOWING MATTERS BEING SUBMITTED AND CONSIDERED ACCEPTABLE:

- revised Sustainability Statement, landscaping scheme, Lighting Statement and Framework Travel Plan
- An addendum to the Transport Assessment to model HGV movements associated with the proposed 70% use of the site area for B8 use.
- submission of additional plans and information to resolve Highway England's outstanding issues
- Further clarity regarding how 30% of the developable site area will be brought forward for B2 usage.

AND THE COMPLETION OF A PLANNING OBLIGATION AND PLANNING CONDITIONS;

Proposal

The application is for a hybrid planning application for full and outline permission.

The outline application is for permission, with all matters reserved, for an employment park comprising industrial and warehouse uses, including ancillary offices and small standalone office space. It also proposes ancillary and complementary car showrooms and petrol filling station uses, and/or retail and restaurant uses.

The full planning permission is for a new roundabout access from the A43, internal spine road and engineering operations to create the terraces for the units including foul pumping station, pedestrian and cycle infrastructure and strategic landscaping including drainage infrastructure.

Consultations

The following consultees have raised **objections** to the application:

- Tiffield Parish Council, Easton Neston Parish Council, CPRE, Cllr Chris Lofts, Highways England (holding objection)

The following consultees have made **comments** to the application:

- Towcester Town Council, Councillor Roger Clarke, NCC Highways, NCC Development Management, Stagecoach Midlands, Historic England, SNC Environmental Protection, SNC Landscape Consultant, SNC LVIA Consultant, SNC Arboriculture, SNC Transport Consultant, NCC Archaeology, Lead Local Flood Authority, NCC Health Impacts Assessment, Police Crime Prevention Design Advisor, Natural England, Environment Agency, Anglian Water, Gardens Trust, SNC Licensing, SNC Building Control, SNC sequential Site Assessment Consultant, SNC Lighting Consultant, SNC Heritage, SNC Ecology, SNC Energy Consultant.

The following consultees are **in support** of the application:

- SNC Economic Growth.

143 letters of **objection** have been received, 15 letters making comments have been received and 2 letters of **support** have been received.

Conclusion

The application has been assessed against the relevant policies in the NPPF, the adopted Local Plan and other relevant guidance as listed in detail at Section 8 of the report.

The key issues arising from the application details are:

- The Environmental Statement
- The Principle of Development
- The Retail Impact of the Development
- The Impact of the Development on the Character and Appearance of the Area
- The Proposed Landscaping Scheme.
- The impact of the Development on Heritage Assets
- The Impacts on the Highway Network
- The Framework Travel Plan.
- The Provision of a Bridge Over the A43
- The Impacts of the Development on the Noise Environment
- The Impacts of the Development on Air Quality
- The Impacts of the Development on Light pollution.
- The Sustainability of the Buildings

- The Impact of the Development on Residential Amenity
- The Impact of the Development on Archaeology
- The Impact of the Development on Ecology and Biodiversity.
- The Impact of the Development on Drainage and Flooding
- The Impact of the Development on Public rights of way
- The Impact of the Development on Agricultural Land
- The Arboricultural Impact of the Development
- The impacts of the Development on Health
- The Socio Economic Impacts of the Development
- The Local Fund

The report looks into the key planning issues in detail, and Officers conclude that the proposal is acceptable subject outstanding matters being delegated to the Assistant Director for Planning and Economy, a S106 agreement and to conditions.

Members are advised that the above is a summary of the proposals and key issues contained in the main report below which provides full details of all consultation responses, planning policies, the Officer's assessment and recommendations, and Members are advised that this summary should be read in conjunction with the detailed report.

If approved, this development is liable to pay the Community Infrastructure Levy as set out in the South Northamptonshire Council Charging Schedule. Advice is available here – <https://www.southnorthants.gov.uk/info/174/community-infrastructure-levy-cil>

MAIN REPORT

1. APPLICATION SITE AND LOCALITY

- 1.1. The application site comprises a large irregular area of land totalling 34 hectares located beyond Towcester Town confines approximately 1km to the north east of Towcester. It is bisected into two individual parcels by Tiffield Lane (which is also locally known as Donkey Lane) which runs north-south; to create an eastern larger parcel of land and western smaller parcel of land.
- 1.2. The application site consists of open agricultural land of arable and grassland fields. The topography of the eastern parcel of land is a gradual slope down towards the south-west corner. Sloping from 114.5m AOD at the highest point of the land to 93m AOD an overall fall across the site of 21.5 metres, which is considered to be a considerable change in land levels. There is also a slight gradient to the south-west within the western parcel of land.
- 1.3. The southern boundary of the application site abuts the A43, which links the M1 at Jnc 15 to Jnc10 of the M40 and is the major arterial route through the district. Between the A43 and the site is extensive roadside landscaping, which is semi mature. On the south east side of the A43 is a large landscaped bund which separates the road from The Shires housing estate.
- 1.4. The north and eastern boundaries of the application site, as well as western boundary of the smaller parcel of land, are bound by agricultural fields. Williams Barns, a single residential property with other ancillary buildings, now converted to commercial uses, is located to the north of the site. To the west of Tiffield Lane is a private residence and which operates a dog kennels; known as Brickyard Farm.

- 1.5. The majority of the site's boundaries are delineated by existing trees and hedgerows which form a strong boundary. An area of woodland is located within the western parcel, adjacent to Tiffield Lane which forms part of the former route of the railway line. This route is still very identifiable in the landscape between the A43 and the former station at Blisworth Arm.
- 1.6. To the north of the site the land rises toward the village of Tiffield Located 1.2km from the site and north west toward the village of Caldecote located 0.8km from the site.
- 1.7. An open watercourse runs through the south-western corner of the eastern parcel which forms the main drainage route for the land. In the eastern half of this parcel is a part of a former railway line, which is now heavily overgrown. Further to the north east is a located adjacent to the site is a small telecommunications tower, viewed against the backdrop of Old Soldier Spinney to the north.
- 1.8. A public right of way (PRoW) Bridleway SB32 runs through the south-western part of the eastern parcel, from Tiffield Lane to the southern edge of the site where it is severed by the A43. The Bridleway continues over the southern side of the A43, where it becomes a footpath only, through the residential development and links to Northampton Road. On the other side of Tiffield Lane is a PRoW Footpath SB1, which passes through the western parcel from south to north along the western boundary of the application site. A further Footpath SB52, stretches from the southern end of Tiffield Lane through a central reservation on the A43 to link with Old Tiffield Road.
- 1.9. The application site includes the north-eastern part of Northampton Road between the roundabout and the A43. Northampton Road is a two lane carriageway with a footpath that is located on south east side of the road and is one of the primary access to the town as well as serving The Shires housing estate and used to be part of the main road between Towcester and Northampton.
- 1.10. There are no designated heritage assets within or adjacent to the application site. The closest designated heritage asset is the Grade II* Easton Neston Registered Park and Garden, located approximately 190m southeast of the site boundary at its closest point, beyond residential properties on the opposite side of the A43 and Northampton Road. The Easton Neston Registered Park and Garden is also designated as a Special Landscape Area. The closest listed building to the Site is the Grade II North Lodge and Gateways to Easton Neston House, approximately 260m southeast of the Site Boundary.
- 1.11. On the south east side of Northampton Road is the western boundary of the Easton Neston Conservation area which extends almost along the entire length of the Northampton Road and includes the Easton Neston Park, Easton Neston House and associated buildings (including western approaches), Third Lodge and Home Farm.
- 1.12. Hulcote Conservation Area abuts the Easton Neston Area and is quite tightly drawn around the built form of the settlement. Tiffield Conservation Area, to the north of the site, include the dwellings facing onto High Street South in this more linear part of the village
- 1.13. Towcester Conservation Area's north eastern boundary runs front the southern boundary of Paynes Nursery along the back of the rear garden of the dwelling fronting onto Watling Street and then crosses the Northampton Road adjacent to the short stay car park and then runs to the north east of Bury Mount.

2. CONSTRAINTS

2.1. The identified planning constraints of the application site are:

- The application site lies within the open countryside.
- Bridleway SB32 runs through the site
- Footpath SB1 runs through the site
- Footpath SB52 runs adjacent to the site
- Part of the western parcel of land is a former land fill site.
- Part of the site is located within a potential wildlife site
- The site lies within 2km of the following County Wildlife Sites
 - Cappenham Bridge Drain
 - Tiffield Lake
 - Tiffield Quarry
 - Duncote Marshy Field
 - Tiffield Disused Railway (North)
 - Tiffield Verges
- The disused railway line that runs adjacent to Tiffield Lane is identified as a Green Infrastructure Corridor.
- Part of the site is thought to have potential for archaeological interest from the following sources
 - Northampton & Banbury Junction Railway (Towcester - Blisworth)
 - C19th Industrial Activity
 - Stratford & Midland Junction Railway (Towcester to Olney)
 - Northampton & Banbury Junction Railway (Towcester - Blisworth)
 - Stratford & Midland Junction Railway (Towcester to Olney)
- The Second Lodge on Northampton Road is a grade II listed building
- There are three individual trees located on the west side of Northampton Road which are subject to a Tree Preservation Order.
- Third Lodge (near the Hulcote turn on the Northampton Road) is a Non-Designated Heritage Asset.
- The Eastern Neston Estate to the south east of Northampton Road is a Grade II* Registered Park and Garden.
- The Easton Neston Conservation Area which also lies to the south east of Northampton Road and covers part of the Easton Neston Estate and is also subject to an article 4(1) direction.
- Land neighbouring the west of the application site is also allocated for employment uses in the adopted Part 2 Local Plan, under Policy AL1
- The site lies with Flood Zone One.
- The site lies within the Rural CIL charging zone.

3. DESCRIPTION OF PROPOSED DEVELOPMENT

3.1. The planning application is for a hybrid planning permission, this a mechanism allowed within the planning legislation whereby part of the development would be granted full planning permission and part of the site in outline planning permission only. This is a common approach for large scale development which allows the infrastructure to be delivered whilst the future reserved matters applications are

being worked up. With regards to the outline planning permission all matters are reserved for future consideration.

- 3.2. The elements of the development which are applied in full and the elements which are applied for in outline are set out below

Full application

- 3.3. A new vehicular access into the application site will be created including a new four-arm roundabout off the A43 at the Northampton Road junction.
- 3.4. An internal spine road to link the new roundabout to the development zones within the site is proposed. It will also link with Tiffield Lane to create a new junction providing access onto Tiffield Lane and to the western parcel of the site. Tiffield Lane will be realigned at the spine road junction to provide a staggered crossroad. Furthermore, a strip of land within the western parcel of land is to be safeguarded for a potential access road connecting from the spine road into adjoining land to the west, to be potentially brought forward by Towcester Town Football Club. The spine road and roundabout will be built to adoptable standards and maintained by the relevant highway authorities.
- 3.5. The Tiffield Lane/A43 junction will be altered to enable left in and left out turnings only. As part of these alterations to the Tiffield Lane, passing bays will be provided at two locations. A signalised crossing is proposed at the western side of the site access roundabout, providing access between the site and Towcester. This connection will be provided via an upgraded pedestrian and cycle link along Northampton Road. The informal footpath along Northampton Road is to be removed and a two-metre footway/cycleway provided in its place. A turning loop will be provided within the Site to enable all buses to leave and re-enter via the A43.
- 3.6. The lighting along the spine road and roundabout junction is proposed as part of the full application. Lighting for the A43 between the proposed roundabout and existing Tove roundabout is also proposed.
- 3.7. The creation of the development plateaus for Development Zones A and B, as well as Plot 1 within Development Zone C, within the eastern parcel forms part of the application
- 3.8. The application includes full details of the landscaping around the periphery of the site known as the strategic landscaping and includes enhancements to the existing landscaping along the site's boundaries including the A43 and Tiffield Lane. In addition, an attenuation pond feature and wetland habitat are to be created in the south-western corner of the eastern parcel. Landscaping is also proposed along the northern boundary with the existing William's Barn farm. Formal tree planting is proposed along the spine road to create an avenue of trees.

Outline Application

- 3.9. The Proposed Scheme has been separated into the following Development Zones,
- Development Zone A (0.67ha) to the east of the roundabout.
 - Development Zone B (3.38ha) to the north of the spine road.
 - Development Zone C (11.90ha) to the south of the spine road, and split into three sub zones: C1, C2 and C3.

- Development Zone D (2.40ha) the parcel to the west of Tiffield Lane.

3.10. Employment uses to be delivered within each Zone are shown in the table below.

Development Zone	Use Class	Maximum Quantum (GIA – m ²)
A	A1, A3, B1a, B1b, B1c, B2, B8 and Sui Generis (car showrooms, petrol filling stations)	2,400
B	B1b, B1c, B2, B8 with ancillary B1a	18,000
C	B1b, B1c, B2, B8 with ancillary B1a	71,000
D	B1b, B1c, B2, B8 with ancillary B1a	11,000
	Total	102,400

3.11. For clarity a summary of the use classes is set out below

- A1 - Retail Uses
- A3 - Restaurants and Cafes
- B1(a) - Offices
- B1(b) - Research and Development
- B1(c) - Light Industrial
- B2 - General Industrial
- B8 - Storage and Distribution

The car showroom use and petrol filling station lie outside the use classes order and therefore have the Sui Generis classification.

3.12. The maximum quantum for each use class is set out in the table below:

Use Class	Maximum Quantum (GIA – m ²)
A1 or A3	1,000
B1a (as a stand alone unit)	2,400
B1b, B1c, B2, B8 with ancillary B1a	100,000
Sui generis (car showrooms, petrol filling station)	1,000

3.13. The 100,000 square metres figure allows for the provision of 70,000 square metres of floor space at ground floor level with up to an additional 30,000 square metres to be provided through mezzanine floors.

- 3.14. Within Zone A, which is the part of the site proposed to deliver the ancillary and complementary uses on the site, the proposed maximum floor spaces for each use is broken down further as follows

Use Class	Maximum Floorspace (sq.m)
A1 or A3 (including ancillary A1 and A3 retail space within any Petrol Filling station)	1,000
B1/B2/B8	2,400
Sui generis (petrol filling station)	1,000
Sui generis (car showrooms)	2,400
Total Zone A Max Floorspace	2,400

- 3.15. A parameters plan has been submitted with the application which the applicants are seeking approval for as part of the outline details, this plan will then set the parameters and framework for the further reserved matters application. The parameters applied for in each zone of the development are as follows.

	Zone A	Zone B	Zone C	Zone D
Proposed uses	A1, A3, B1(a), B(b), B1(c), B2, B8	B1(b), B1(c), B2, B8 with ancillary B1(a)	B1(b), B1(c), B2, B8 with ancillary B1(a)	B1(b), B1(c), B2, B8 with ancillary B1(a)
Number of units	1 to 4	2 to 5 units	2 to 5	1 to 12
Units sizes	500sqm to 2400sqm (GIA)	1,000sqm to 15,000sqm (GIA)	1,000sqm to 56,000sqm (GIA)	400sqm to 2000sqm (GIA)
Development Quantum	2400sqm	18,000 sqm	71,000sqm (GIA)	11,000sqm (GIA)
Max Ridge Height	124m AOD	124m AOD	127.5m AOD	117m AOD
Highest Finished Floor Level	113m AOD	105-109m AOD	102m-113m AOD	101m – 103m AOD
Max height of buildings to ridge	12m	15m	21m	15m

- 3.16. The development also proposes that 30% of the developable land area of the site will come forwards within the Light Industrial or General Industrial use classes only. Furthermore, development Zone D will be reserved for smaller units and marketed in accordance with a marketing strategy to be agreed with the Council.

- 3.17. Two indicative masterplans have been submitted which show how the development might come forwards. Both masterplans show a single drive through

restaurant and petrol filling station in Zone A, two industrial units in Zone B and 12 smaller units in Zone D. The first masterplan shows three units located within Zone C, plots 1, 2 and 3, the second masterplan shows plot 1 being identical to plot 1 shown on the first masterplan however plots 2 and 3 have been replaced with a single larger unit.

3.18. The application also includes a phasing plan with the application which shows how the development will come forward:

- Phase 1a – Which consists of highway works (internal spine road, A43 works and Northampton Road works), necessary infrastructure, plot levelling, strategic landscaping,
- Phase 1b – Which consists of building out the development Zones A to C and further landscaping.
- Phase 2 – The plot levelling and building out of Zone D and the further landscaping associated with this zone

3.19. In order to bring the development forwards Bridleway SB32 which cuts through the south west corner of the site is proposed to be stopped up/extinguished as the applicant considers it would conflict with the required level changes, contouring and vertical alignments of the infrastructure works.

3.20. To replace the Bridleway the development will re-provide a pedestrian route to Towcester along the spine road which will provide a shared footway/cycleway on the southern side and a footway along the northern side. These will connect with a safe crossing point (possibly with a Pegasus crossing suitable for horse riders) at the proposed roundabout, onto the Northampton Road; where a new combined footpath and cycleway is to be provided.

3.21. To facilitate development within the western parcel, it is proposed to divert footpath SB1 which runs through it. The proposed diverted route as shown on the Illustrative Masterplans with the footpath running around Development Zone D to the west and reconnecting with the original footpath, both to the north and south.

3.22. It should be noted that the application does not formally apply for any stopping up or diverting of any footpaths or bridleways and these will be applied for separately under section 257 of the Town and Country Planning Act applications, at a later date to the Local Planning Authority.

3.23. During the consideration of the application a revised Design and Access Statement has been submitted to show a colour banded approach to the appearance of the buildings. In addition, a revised parameters plan has been submitted which shows the maximum height of the buildings in elevation and a safeguarded footpath link to the Belle Plantation.

4. RELEVANT PLANNING HISTORY

4.1. The following planning history is considered relevant to the current proposal:

<u>Application Ref.</u>	<u>Proposal</u>	<u>Decision</u>
S/2019/1342/SCO	Scoping opinion for the current proposal	Scoping opinion issued

5. PRE-APPLICATION DISCUSSIONS

5.1. The following pre-application discussions have taken place with regards to this proposal:

<u>Pre.App Ref.</u>	<u>Proposal</u>
P/2018/0309/PRH	Hybrid application for an employment use development

5.2. Advice given relating to following issues

- Landscaping
- Acceptable uses
- Quantum of development
- Heights of buildings
- Appearance of buildings
- Proportion of light industrial and general industrial uses
- Mix of uses in Zone A
- Footpaths

6. RESPONSE TO PUBLICITY

6.1. This application has been publicised by way of site notices displayed near the site, by advertisements in the local newspaper, and by letters sent to all properties immediately adjoining the application site that the Council has been able to identify from its records. The final date for comments was 23 December 2020 although comments received after this date and before finalising this report have also been taken into account.

6.2. 138 households have made representations to date **objecting** on the following grounds (relevant planning issues paraphrased):

Highways Concerns

- The proposed roundabout on A43 would be detrimental to highway safety;
- The proposed roundabout junction at Hulcote/A43 would increase the amount of traffic (including HGV's and buses (No. 88 bus service)) using Northampton Road with resultant harm to highway safety/the safety of highway users and increased potholes and damage to the road surface;
- A survey of residents of The Shires and Towcester carried out on their local Facebook page demonstrated that residents would be significantly more likely to use the new roundabout access/Northampton Road than at present;
- Northampton Road is not considered to be suitable for use by HGV's and buses;
- The development would result in increased traffic and congestion on the Brackley Road (and past Sponne School), the A5 and the Saracen's Head junction during construction and operation;
- The development would lead to increased traffic and rat-running through existing villages (e.g. Tiffield and Caldecote) and residential areas near the site which would be detrimental to highway safety and residential amenity especially when traffic is diverted from the M1.
- The Transport Assessment does not accurately assess the highway impacts of the development (e.g. it doesn't take account of the impacts of traffic

diverting from the M1 when this is closed/congested and underestimates the amount of traffic/HGV movements the development would generate and assumes that a relief road exists (which is a designated trunk road)) and that the proposed mitigations are inadequate; it classifies the A43 as a rural route rather than the strategic national route it is considered to be by Highways England;

- The development could jeopardise the delivery of Towcester by-pass and/or make the by-pass irrelevant;
- The development could prejudice the implementation of a future Expressway Scheme on the A43;
- The benefit of removing dangerous right-hand turns onto and off of the A43 at the Hulcote junction does not require a roundabout as this could also be achieved by stopping-up the central reservation;
- The new roundabout on the A43 would make it difficult for large grain trucks to exit Hulcote thereby causing a blockage;
- The amount of HGV trailer parking spaces should be doubled;

Air Quality/Climate Change

- The proposed roundabout junction at Hulcote/A43 would lead to more traffic congestion in the vicinity and result in increased air pollution in proximity to the A43 and within the Towcester AQMA on the A5 in conflict with the aims of the adopted Air Quality Management Plan;
- The development is in conflict with the County's target for carbon neutrality by 2030;
- Concern about air pollution generated by vehicle movements associated with the development itself;

Nuisance and Residential Amenity

- The operation of the development and associated HGV movements/deliveries would generate increased noise and vibration nuisance for residents and particularly at night if allowed to operate 24hrs;
- The proposed roundabout junction at Hulcote/A43 would lead to more traffic congestion in the vicinity resulting in increased noise pollution for residents living in proximity to the A43;
- The proposed roundabout junction at Hulcote/A43 would increase the amount of traffic (including HGV's and buses (No. 88 bus service)) using Northampton Road with resultant harm to residential amenity for those living adjacent;
- Loss of light due to the scale of the development;
- The current economic/Covid situation means uncertainty for how quickly the development would be built out – potentially extending the construction period with its associated nuisance/disruption;
- Large buildings would 'reflect noise' back towards residential areas;
- Concern about light pollution which has not be adequately assessed and further mitigation measure are required;
- The development would result in more HGV's being parked in lay-bys in the vicinity resulting in increased litter;
- The development would result in increased crime and litter in the vicinity;

- Odours and fumes nuisance from petrol filling station and restaurants;
- The proposed acoustic fence is inadequate;

Environmental/Health Impacts

- Loss of agricultural land;
- Loss of green spaces which are important for mental and physical health and absorption of CO₂ and The Centre for Research on Energy and Clean Air have stated : "One of the most important contributors to death from Covid-19 is poor air quality";
- Loss of wildlife habitat and detrimental ecological impacts;

Rights of Way

- Loss of the at grade pedestrian and cycle crossing at Tiffield Lane and A43 which would be replaced with less convenient up-hill crossing at the proposed Hulcote r/a/b which is not on the pedestrian or cyclist desire line;
- Loss of public right of way;

Justification/Need for Development

- Existing warehouse developments in the vicinity are not fully occupied or completed and there are also other car salesrooms and petrol filling stations in the vicinity. It is therefore questioned whether this development is needed or justified; particularly in light of the low unemployment rates for Towcester, the current pandemic/changes to working practices and the present economic conditions. Furthermore, there are already other commercial developments proposed nearby (e.g. Woolgrowers, Bell Plantation and Silverstone);
- Concern that the number of jobs this development will create will not be as high as stated by the applicants;
- The current economic/Covid situation means uncertainty for how quickly the development would be built out potentially resulting in an empty 'white elephant';

Landscape Visual Impact/Impact on Local Character

- Such large commercial buildings would have detrimental visual and landscape impacts and would spoil and urbanise the rural setting of Towcester;
- Inadequate landscaping is proposed;
- Concern that the development is in 'open countryside' beyond the built-up extent of the town and the A43 'town boundary' and allowing development here would set a precedent for further urban sprawl;
- Concern the development would change the character of Towcester as a market town making it more like a dormitory on the edge of commercial estates. The development is disproportionately large in comparison with the town and goes beyond the definition of the town as a 'rural service centre';

Sustainability/Location

- A development like this should be sited at more sustainable and appropriate locations such as DIRFT or close to the M1/Northampton town;

- The development should be sited away from the town and residential areas with its own dedicated highway access like other 'out-of-town' developments;
- Concern that the development is not in a sustainable location as it is situated too far from dwellings for people to realistically walk and cycle to it;
- Proposed pedestrian and cycle links to the development are not safe or convenient and most visitors will drive there;

Heritage

- Detrimental to Hulcote conservation area;
- The Heritage Assessment is inadequate because it fails to take account of the impact upon listed buildings within Caldecote which are less than 1km from the development;
- The development would impact on built non designated heritage assets.

Socio-Economic Impact for Towcester

- The development would not create significantly more jobs for Towcester residents but would attract employees from further afield and have very limited socio-economic benefits for local residents;
- Users of the development would park in Northampton Road Long Stay Car Park with negative impacts for use of the town centre and increased traffic congestion in the town;
- Increased traffic in Towcester town centre would put people off using the shops;

Other Matters

- The lack of detail on the nature of the development make it impossible to properly assess the impacts;
- Concern about additional surface water flooding;
- The public consultation exercise carried out by the applicants contained misleading and incorrect information;

Suggested Conditions/S106 Obligations

- If permission was to be granted the following conditions would be recommended:
 - prevention of HGV's using Northampton Road, Tiffeld village and Caldecote village (via weight restrictions/routing agreements);
 - traffic calming to slow traffic and deter rat-running;
 - provision of safe and convenient pedestrian and cycle paths and crossings along Northampton Road and for A43;
 - speed camera for Northampton Road;
 - improvements to Saracen's head junction;
 - Sat-nav routes through Caldecote, Tiffeld and Northampton Road should be removed;
 - additional acoustic fencing along the A43 to protect Third Lodge and Easton Neston;
 - time restriction on operation of all lighting;

- no illuminated signage;
- reduction/limit on the height of the buildings;
- screening/hedges retained on site boundaries;
- low noise tarmac used on A43;
- footbridges/pedestrian tunnels for the A43;
- the development should be accessed by a slip-road onto/from the northern bound side of the A43 only;
- speed reduction on the A43;
- If permission is to be granted significant mitigation will need to be provided in terms of highway infrastructure, drainage, landscaping and financial contributions to local community services;

6.3. 2 households have made a representation to date **supporting** the application on the following grounds (relevant planning issues paraphrased):

- This development will bring jobs and money to the area which would be beneficial in the current economic climate;
- The development would bring a greater diversity of employment to Towcester;

6.4. 14 households have made representations to date **commenting** on the application (relevant planning issues paraphrased):

- Plans for managing traffic of the development are not robust enough;
- Traffic calming/speed camera/signage/removal from Sat-nav routes will be needed for Northampton Road, Caldecote village to deter rat-running and in the interests of highway safety;
- Improved pedestrian crossings and links (hard surfaced footpaths) should be provided for Northampton Road;
- Improved active travel routes (pedestrian and cycle routes) should be provided to serve the development and surrounding routes should be enhanced and the proposed cycle way should extend along the entire length of Northampton Road and be properly marked and extend into Hulcote.;
- The volume of traffic associated with the development has been underestimated and congestion and travel times will increase;
- Inadequate consideration of environmental impacts; air pollution;
- More justification that existing infrastructure for Towcester would be able to cope with the development;
- Suggest that a bridged over-pass would maintain the flow of traffic on the A43;
- Caldecote should be restricted to 'local access' only to prevent rat running;

COMMENTS RECEIVED FOLLOWING RECONSULTATION ON ADDITIONAL PLANS SHOWING TRAFFIC MEASURES ON NORTHAMPTON ROAD:

6.5. 5 households have made representations to date **OBJECTING** on the following grounds (new relevant planning issues paraphrased):

- The north option for the puffin crossing would not be convenient for pedestrians using existing footpaths in the park;

- Build-outs and giveways to opposing traffic are not environmentally friendly (causing increased emissions and fuel use due to slowing/accelerating traffic) and could increase risk of accidents;
- The additional traffic measures take no account of traffic flow in and out of Hulcote Lane which also serves as the access for Hulcote Crop Store;
- The proposed measures for Northampton Road do not address the concern of additional traffic, noise and air pollution;

6.6 TOVE VALLEY CENTRE (Tove Valley Baptist Fellowship): **Object** on the following grounds (paraphrased): Tove Valley Centre (TVC) is a multipurpose church and community centre due to open Spring 2021. There is concern that the increased traffic using Northampton Road as a result of this development would conflict with traffic/visitors to the TVC and adjoining Tove Long Stay Car park; which will act as an overflow when larger events take place. Believe that the proposed puffin crossings need revision to provide convenient and safe access for pedestrians using the TVC and recommend the following changes: *“In conclusion, adopting the northern option for the Puffin crossing (17342-37A), with an additional approximately 250m long footpath from the crossing point to Graham Hill Road, including carriageway narrowing and build-outs would improve the accessibility of the SNC long-stay car park, the Tove Valley Centre and provide a signalised crossing point in flood conditions for all Shires residents. Without this small additional cost, neither of the two Puffin crossing proposals are fit for purpose.”*

6.7. 1 household has made a representation to date **COMMENTING** on the application (new relevant planning issues paraphrased):

- Proposal for south puffin crossing supported as this is the majority route for pedestrians from The Shires estate. It also allows wheelchair access to the eastern side of the road.

6.8. The comments received can be viewed in full on the Council’s website, via the online Planning Register.

7. **RESPONSE TO CONSULTATION**

7.1. Below is a summary of the consultation responses received at the time of writing this report. All responses are available to view in full on the Council’s website, via the online Planning Register.

PARISH/TOWN COUNCIL AND NEIGHBOURHOOD FORUMS

7.2. TOWCESTER TOWN COUNCIL: Make the following **comments** (paraphrased): Whilst they recognise that the site is allocated within the development they have a number of concerns: The LPA should be satisfied that the TA is robust and accurately estimates the increase in traffic in the vicinity (and particularly Northampton Road/A5) and the effect the new roundabout will have on driving habits; recommend that the proposed spine road is reconfigured to prevent rat running from A5 to the new Hulcote roundabout; concern that the development is speculative with no end users currently identified; going forward they would like to contribute to minimising the impacts of this development by having an influence over the scale, height and design of the buildings, landscape impacts and screening, air, noise and light pollution and increases in traffic.

UPDATE: **Comment** that the north option for the puffin crossing is preferred however in the interests of public safety, this must be in conjunction with alterations to the existing footpath into the Tove Valley Centre.

7.3. TOWCESTER LOCAL HISTORY SOCIETY: No comments received to date.

7.4. TIFFFIELD PARISH COUNCIL: **Object** on the following grounds (paraphrased):

- Lack of clarity about the exact nature of the development means that the impacts of the development cannot be fully understood;
- The new Hulcote turn roundabout would result in making Northampton Road a rat run and increase traffic congestion in Towcester which in turn would exacerbate air pollution;
- The proposed pedestrian and cycle links between Towcester and Tiffield and Bell Plantation are inconvenient and potentially dangerous and could result in congestion on the A43. Suggestions are made for a footbridge which could provide a safe and practical green corridor connecting Towcester to Northampton;
- Unsustainable location and piecemeal development. As acknowledged by the applicant's EIA most employees of the development would be commuters from neighbouring authorities. Even local employees would drive to this site due to the lack of convenient and safe non-vehicular links and public transport options;
- Conflicts with aims and targets for climate change and modal shift because the development: will increase greenhouse gas production in manufacture, construction and operation despite mitigation measures proposed by the developers; will increase greenhouse gas, noxious gas and particulate production from traffic to and from the site and further exacerbate these problems on our local road network, particularly through our village and in Towcester; does not offer a sufficiently large Modal Shift away from car use, especially if this development were to attract employees from a wide area;
- Detrimental impacts on highway safety. The new roundabout would result in more congestion on the A43 and might prejudice the implementation of a future expressway scheme – a long-term strategic benefit is being sacrificed for a short-term gain;
- Cumulatively with other developments and allocations for commercial developments in the vicinity the development would: Increase the amount of commuting; strengthen the cycle of car dependency; have a deleterious impact on the local transport infrastructure; increase congestion, and therefore pollution and journey times, on what is a main strategic arterial route by putting another signalised roundabout on the A43; blur the boundary between Towcester and the surrounding countryside;
- Dispute the need for this development on the grounds that it: does not justify the need for extra employment in the area; takes no account of existing and planned local warehousing or office capacity; does not conform to either the spirit or the letter of paragraph 5.70 of the WNJCS either in desirability or sustainability; takes no account of the changing economic landscape brought on by the coronavirus epidemic and resultant economic climate; serves no identifiable building need. (particularly in this open countryside location); has no evidence that we are aware of that the proposed land use has been independently assessed or market evidenced.
- Concern about detrimental traffic impacts upon Tiffield on the basis that: this application will markedly increase traffic flows through Tiffield; present unacceptable additional hazards to local adults and children, especially in the environs of the schools; increase noise and air pollution, affecting the quiet, rural nature of Tiffield village and its roads;

- Consider that the development would be harmful to the visual amenities of the area when considering that this is a greenfield site; the potential scale of large warehouse buildings; the proximity of the development to Easton Neston;

7.5. Tiffield Parish Council also raise concerns/queries about the following matters:

- Conjoined developments: Has this site been split from the neighbouring Bell Plantation site so that it can be considered under the 'small and medium sized' definition in the SNLP?
- Link to the A5 from Tiffield Lane: limited detail about how/when this might be delivered and the highway safety impacts of this;
- Concern that this land was allocated without full declarations from Councillors regarding conflicts of interest;
- Tiffield Lane/A43 crossover closure: Inconvenience for Tiffield residents who walk and/or cycle

7.6. EASTON NESTON PARISH COUNCIL: **Object** on the following grounds (paraphrased):

- Unsubstantiated Demand - such a large development goes beyond that consistent with a 'rural service centre' with no justification of the availability of a local workforce to fill the jobs created and no evidence of a demand for the proposed uses in the area;
- Unsustainable Development – the location of the development and lack of safe pedestrian/cycle links to it mean that private motor vehicles are the only realistic travel mode;
- Counter to Environmental Improvement Policies – the provision of a new roundabout on the A43 would result in increased traffic, congestion and air pollution and be detrimental to highway safety for Northampton Road/The Shires and Hulcote; there has been no consideration of slowing moving/HGV traffic serving Hulcote Crop Store; the TA is based on a mistaken assumption that the proposed Towcester Relief Road would divert traffic from the town centre but this will not be the case as the A5 will continue to be a trunk road and the relief road will only be designated as a local link road; increased congestion in Towcester would run contrary to reducing air pollution within Towcester's AQMA;

7.7. Easton Neston PC also recommend that the proposals are revised by providing units to serve high-tech industries and provide high skilled employment opportunities more suited to the locally available workforce; provision of a pedestrian/cycle bridge over A43; reconsider the A43 access to Northampton Road/Hulcote; take account of air quality in Towcester.

7.8. GREENS NORTON PARISH COUNCIL: No comments received to date.

CONSULTEES

7.9. WARD MEMBERS:

7.10. CLLR ROGER CLARKE: (Ward Member for Tiffield and Caldecote) makes the following **comments**: The major criteria of the two communities are; Safety and avoiding extra traffic through both Tiffield and Caldecote; Maintaining the existing pedestrian passage across the A43; Not wanting a diverted, potential, yet to be rubber stamped, detour through the Bell Plantation onto the A5; footpath system and thence to Towcester via the Tove Roundabout (A5/A43); The tiered levels of

the site to avoid visible intrusion of storage buildings from Caldecote; Severe landscaping to enhance the A43 vision and the internal landscape. There is a desire for a safe crossing for the A43 from Donkey Lane to north Towcester via a bridge, tunnel or regulated safe crossing. Recommends a community fund.

7.11. CLLR CHRIS LOFTS: (Ward Member for Towcester Mill including Caldecote village) **objects** to the application on the following grounds: Concern that the TA does not address the issue of congestion on the A5/A43 and when the M1 is closed and rat running through Caldecote which would increase as a result of this development and there are no proposed mitigations to prevent this.

7.12. PLANNING CASEWORK UNIT: No comments received to date.

7.13. NCC HIGHWAYS: Make the following **comments**:

- Transport Assessment – currently under review; further comments to follow;
- Public Transport - the proposed bus infrastructure is a promising start and could be acceptable with some additions; the roundabout on the A43 would allow right turns onto the A43 from Northampton Road which would be beneficial to existing bus services; a financial contribution is requested towards bus services for a period 5 years and to provide 4 week bus passes for new employees on first occupation (at a cost of £110 per pass);
- Walking and cycling – content with the provision of infrastructure for walking and cycling but more details of cycle parking for individual plots will be needed;
- Travel Plan – Further work is needed on the Marketing Strategy and funding details for the implementation and delivery of the TP are required;
- Public Rights of Way – No detail of the Bridleway which crosses the site. A condition is recommended which requires the submission and approval of details for any works involving the PROW prior to commencement of those works;

UPDATED COMMENTS:

- Transport Assessment – no objection to the principle of the development on the basis of the TA but recommend a **condition** to restrict the extent of B1(a) uses on the site to no more than 2400sqm which have not been assessed beyond ancillary only; to address concerns about the increased use of Northampton Road the applicants are proposing a scheme of two build outs and crossing points on Northampton Road to enable residents and pedestrians to safely crossover Northampton Road and to also enhance the existing traffic calming in place on Northampton Road (currently traffic humps are in place) with the two build outs that will causing traffic to slow down and give way to oncoming traffic. The developer is also proposing to enhance the existing footpath on Northampton Road to provide a shared pedestrian and cycle facility. A Stage 1-2 Road Safety Audit will be required; do not consider that the traffic data provided supports concerns about rat-running through Tiffield and Caldecote but notes that the applicant is proposing to provide a financial contribution to cover unforeseen traffic impacts in any event.
- Road Safety Auditing - The proposals have been subject to an RSA1 and the has been reviewed. There are a number of outstanding issues remaining that the applicant will need to work through with Highways England and the LHA. NB Any works on the A43 need HE approval as it is a trunk road.

No objection in principle to the proposals, however, during the course of the necessary Section 278 Agreement that the developer will need to enter into with the LHA, the necessary RSA1-2, that will be included in the review of the proposals, will pick up any matters that may require attention in respect of the design and dimensioning of the proposals. Recommend a condition is imposed to the effect that a Stage 1-2 RSA will be required to be included in the proposals for these proposed works on Northampton Road.

- Highway Adoption - The LHA would be willing to adopt the 7.3m link between the A43 and Tiffield Lane subject to technical approval of the design. Other parts of the highway infrastructure are likely to remain private or would come under HE.
- Public Transport – Funding for a 5 year extension to bus service still to be agreed and previous comments stand.
- Travel Plan – Previous comments stand but a sum of £1000 per annum for a period of 5 years or the construction period (TBA) is required to cover monitoring of the TP and LHA to offer further advice on measures required to monitor the TP.
- Public Rights of Way – Recommend that a suitable diversion is found for the bridleway SB32 rather than complete extinguishment, no objection to minor diversion of public footpath SB1. Recommend a condition to require a shared footpath/cycleway for Northampton Road.
- Construction Traffic Management Plan (CTMP) – recommend a condition to require submission of a CTMP prior to commencement.

7.14. NCC DEVELOPMENT MANAGEMENT: Make the following **comments requesting contributions, conditions and informatives**:

Fire Hydrants: It is expected that this development may require a minimum of 21 x fire hydrants to be provided and installed. The capital cost of each hydrant (including its installation) is **£892 per hydrant**, the cost of which is expected to be met by the developer in full (**Totalling £18,732**). The location of these must be agreed by a condition and an informative is also recommended.

Broadband: An informative is recommended.

7.15. NCC ARCHAEOLOGY: **No objection subject to conditions** to require the submission and approval of a programme of archaeological work and the preservation of remains in situ (if necessary). **UPDATED COMMENTS**: After further consideration there is no indication of remains of such significance that preservation would be required by the Archaeological Advice Service and nor do the proposals in their current form lend themselves well to preservation of meaningful and coherent areas of archaeological activity. In light of this it is recommended that excavation of areas of archaeological interest take place ahead of development as secured by a condition for a programme of archaeological work.

7.16. NCC RIGHTS OF WAY: See NCC Highways.

7.17. NCC MINERALS: No comments received to date.

7.18. NCC LEAD LOCAL FLOOD AUTHORITY: **No objections subject to conditions** requiring the submission and approval of a SUDS scheme; compliance with the agreed FRA and Drainage Strategy; submission and approval of a surface water drainage maintenance plan and submission of a verification report for the surface water drainage system.

- 7.19. NCC HEALTH IMPACT ASSESSMENTS (PUBLIC HEALTH NORTHANTS): Make the following **comments**: Based on the supporting Health Impact Assessment they observe a balance of both positive and negative implications on health and wellbeing. These include: positive local employment and economy opportunities; increased local connectivity for sustainable transport; increase in the level of congestion; and a detrimental impact on air quality. Recommend that a robust implementation plan should be added to the Travel Plan once TP Co-ordinators are appointed; additional carbon off-set and capture methods should be considered; employment opportunities should be proactively targeted within local communities.
- 7.20. NORTHANTS POLICE CRIME PREVENTION DESIGN ADVISOR: **No objection subject to a condition** to require the submission of an overarching security strategy document (in accordance with the SPG on Planning Out Crime/Secured by Design/Policy S10 of JCS and SS2 of the SNLP) with reserved matters.
- 7.21. NATURAL ENGLAND: **No objection**.
- 7.22. NORTHANTS AND BEDS WILDLIFE TRUST: No comments received to date.
- 7.23. HIGHWAYS ENGLAND: **Holding objection**. The application cannot be determined before the 27 January 2021 whilst further consideration is given to:
- Compliance with the requirements set out in the Design Manual for Roads and Bridges (DMRB) is needed. Where this cannot be achieved a departure from standard will need to be approved;
 - Severe reverse curves (most notably on the exit from the roundabout) without any transitions need to be addressed/re-designed;
 - Vehicle tracking of the junction should be provided;
 - Narrow roundabout access from the development leading to HGV's frequently overrunning on the inside radius thereby causing damage to the footway and creating a risk of collision with pedestrians and cyclists waiting to cross needs to be addressed;
 - Visibility splays are not shown on the drawing; clarification should therefore be provided;
 - The presence of a lay-by within 450m of a junction will require a departure; an application for this will have to be submitted to Highways England;
 - No provision is shown for future maintenance access. Appropriate details should therefore be provided;
 - The Flood Risk Assessment refers to a proposed thrust bore rising main beneath the A43 and this will require prior notification and agreement with Highways England. If / once agreed, to assure Highways England's geotechnical assets are protected, DMRB CD 622 *Management of Geotechnical Risk* certification process, covering the management of geotechnical risks on Highway England / third party projects adjacent to, or under / over the strategic road network, will need to be followed;
 - The scheme will involve earthworks to accommodate the realignment to the north of the junction. These works will be required to follow DMRB CD 622 – *Management of Geotechnical Risk*;
 - The extent of third party land required to deliver the scheme, currently outside of the highway boundary, should be clearly identified on a (separate) drawing with shading. Confirmation should also be sought regarding

ownership/status of this land as the freehold title will need to be transferred to Highways England free of encumbrance.

UPDATED COMMENTS:

- They agree that the development is not likely to result in any significant traffic impact on the Strategic Road Network (SRN) in the area and no further assessment are needed;
- Modelling is not required for occasional or irregular events (i.e. closure of M1). The diversionary route suggested between M1 junction 14 and 15 uses A508 and Old Stratford Roundabout to travel towards Milton Keynes before using the A509 Portway to re-join the M1. Therefore it is unlikely that the closure of the M1 would affect the junctions that the development trips are expected to impact;
- The closure of the M1 is not a regular scheduled event; rather this may occur due to road improvements or incident closures;
- Should a third party wish to provide a footbridge over a part of the SRN they would need to present the proposals to Highways England. We would then assess these to determine whether what was being put forward would be acceptable;
- They have reviewed the traffic assessment for Abthorpe roundabout that has been provided in support of this development and the queue length and journey time increases have been deemed to be acceptable when compared to the reference case scenario of the same future year. The largest journey time increase that was presented from the modelling was 1 minute 37 seconds. This was in the AM peak opening year of 2021 and was found on the northbound section between the Abthorpe roundabout and Towcester roundabout. Despite this increase, the queues presented in the micro-simulation on this link extending from Towcester roundabout on the A43, have been shown to be continuously moving and can be accommodated within the link between the Towcester and Abthorpe roundabouts. The average maximum queue increases recorded from the modelling at this location was 105 metres between the '2021 Reference Case' and '2021 Reference Case + development' with these queues reaching 509 metres, which is well within the link length limit here. Therefore they do not consider this to have a significant effect on Abthorpe roundabout.
- In the PM peak, the modelling has shown that the A43 Northbound approach to Abthorpe roundabout experiences a 91 metre queue increase in the 2021 Reference Case with development scenario when compared to the 2021 Reference case scenario. This increase is not deemed significant and provides a 36 second increase in journey time.
- Following review of the PICADY model assessment provided by the applicant, it was identified that the proposed development is unlikely to have a significant impact on the SRN at the A43 Blisworth junction.
- The micro-simulation model traffic assessment that has been provided shows that during the 2021 opening year, the roundabout operation is sufficient without the requirement for traffic signals;
- The DfT Road Investment Strategy for the period 2015-2020, RIS 1, included a new road classification: Expressways. The vision was that a network of these roads would be developed through the upgrading of existing parts of the SRN; the timescale for which was by 2040. Since then a map has been published which highlights routes which could become Expressways in the future; including the A43. However, to date, there has been no

announcement of routes which will be upgraded to Expressway standard. Consequently, the proposed development is not affected by any Expressway concept;

- Further details are still required about the A43 roundabout junction as per their previous comments.

- 7.24. STAGECOACH MIDLANDS: Makes the following **comments** (paraphrased): The development provides an opportunity for some beneficial improvements to the existing bus infrastructure in the vicinity of the site (subject to additional funding/financial contributions) and the on site infrastructure appears to be satisfactory subject to a number of specific and technical recommendations. They would recommend the provision of bus boarders at existing stops on Northampton Road.
- 7.25. ENVIRONMENT AGENCY: **No objections subject to a condition** requiring the submission and approval of a scheme for installing the underground fuel storage tank to prevent contamination of groundwater. They also recommend that a number of informatives are added to the decision to advise the developer about risk assessments, site investigations and SUDS.
- 7.26. ANGLIAN WATER: **No objections subject to a condition** requiring submission and approval of a scheme for on-site foul water drainage works. They also recommend that a number of informatives are added to the decision relating to the used water network.
- 7.27. NATIONAL GRID: No comments received to date.
- 7.28. WESTERN POWER: No comments received to date.
- 7.29. HEALTH AND SAFETY EXECUTIVE (EXPLOSIVES): **No comments**.
- 7.30. THE RAMBLERS ASSOCIATION: No comments received to date.
- 7.31. BRITISH HORSE SOCIETY: No comments received to date.
- 7.32. HISTORIC ENGLAND: **No objections** on the following grounds: "The proposed development will cause a degree of harm to the significance, derived from its setting, of the registered park and garden, and the conservation area, at Easton Neston. Negative impacts are, generally limited to the far north of the registered park, and north of the conservation area, and are considered to be low. As such the harm to the historic environment is considered to be less than substantial. The impacts should be minimised through detailed design, including details of unit layout, rooflines and lighting schemes within the proposed development."
- 7.33. GARDENS TRUST: Make the following **comments**: Concern about the impact of the proposed roundabout and the additional lighting on the parkland and recommend the enhancement of tree screening.
- 7.34. CAMPAIGN TO PROTECT RURAL ENGLAND (CPRE): **Object** on the following grounds (paraphrased): because the development of this site has the potential to have significant detrimental impacts upon the gateway to the historic market town of Towcester and the settings of village of Tiffield and the nearby grade II registered park it is vital that the scheme completely accords with Policy AL3 of the SNLP; a more robust masterplan should be provided as there is uncertainty of what may come forward at the detailed planning stage; the proportion of B8 use would dominate the scheme and has not been justified/evidenced; the proposed petrol filling station and large warehouse buildings adjacent to the A43 would not

be appropriate on this gateway site or suited to a market town or in proximity to the grade II registered park; the Heritage Assessment is unsatisfactory because it is only based on a theoretical layout and therefore they disagree with the conclusion that the development would cause less than substantial harm to heritage assets and conversely believe that the scheme could cause significant harm; the proposed landscaping is inadequate and a 'parkland' approach should be utilised which incorporates more landscaping within the site; there is inadequate protection of the Green Infrastructure Corridor within the proposals; the proposals do not accord with Policy AL3 and would be harmful to the setting of Towcester, Tiffield and Easton Neston registered park.

7.35. SOUTH NORTANTS VOLUNTEER BUREAU: No comments received to date.

7.36. SNC ENVIRONMENTAL PROTECTION:

Noise – **No objection subject to safeguarding planning conditions** to deliver mitigation for the development. During the construction phase a Construction and Environmental Management plans needs to be submitted and agreed. For the operational phase of the development minor adverse effects are predicted at worst for all existing residential receptors in respect of noise from operations at the site, including loading and unloading activities within service yards and processes within the buildings and vehicles on site roads and from off-site noise from road traffic using the Site.

Noise mitigation measures proposed include

- Designing the layout to take noise into consideration and moving noise sources away from residential receptors
- Using on plot noise attenuation barriers
- Increasing the sound attenuation properties of the fabric of the buildings
- Reducing noise levels in spaces immediately behind open level access doors.
- Restricting noisier uses such as B2 closer to sensitive receptors

The above measures need to be secured through the use of planning conditions.

Contaminated Land – **No objection subject to a condition** to require submission, approval and implementation of a scheme for dealing with landfill/ground gas. Also recommends an informative regarding nuisance from construction sites.

Air Quality – Make the following **comments**: The Air Quality and transport Assessment for this site assumes the completion of the A5/A43 link road to the South of Towcester. Unfortunately the link road is in the situation that Highways England have not yet signed off the detail required for the roundabouts and there is further discussion with NCC and Highways England with regard to de-trunking of the Watling Street through Towcester and what Road traffic Orders can then be developed to reduce traffic through the town centre. Unfortunately, there is no timescale for a decision on this at present.

It is of concern that the roundabout to the North East of Towcester will have the effect of drawing traffic through Towcester and in effect bypass the bypass and therefore the Road traffic Orders restricting the traffic through Towcester will be necessary to ensure pollution levels of Nitrogen dioxide remain below the objective level within Towcester town centre.

Recommend that electric vehicle charging points are provided at a policy compliant level of at least 10% of all parking spaces.

UPDATED COMMENTS:

Following the submission of additional information from the applicants regarding air quality Environmental Protection **comment** that their concerns as there will be elevated nitrogen dioxide levels with the Towcester. They further consider that the best way forward is to use the results to encourage NCC and Highways England to come to an agreed solution for Towcester Watling Street. Furthermore, electrical charging points are needed to aid the transition to electrically powered vehicles.

7.37. SNC LICENSING: **No objections**. The applicant is reminded that premises that carry out any licensable activity under Licensing Act 2003 will be required to obtain a premises licence prior to carrying out the activity.

7.38. SNC PLANNING POLICY: **Comment** as follows: The development site is allocated for employment uses under Policy AL3 of the adopted Part 2 Local Plan but support for the development is dependent upon favourable responses from the highways authorities and on the proviso that the following matters set out within Policy AL3 have been satisfactorily addressed:

- Provision of a masterplan developed in consultation with the local planning authority, the local highway authority and other statutory undertakers covering the development of the whole site;
- Provisions of an independent study providing market-evidence on the proportion of B1, 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;
- Specified Access and Transport requirements;
- Provision of detailed heritage impact assessment in order to inform the height of any proposed buildings, layout and extent of the development;
- Provision of a detailed assessment for the whole site to characterise archaeological remains, and;
- Provision of a detailed strategic landscape assessment of the whole site to deliver a high quality landscaped setting within and around the boundary of the proposal.

7.39. SNC ECONOMIC GROWTH: **Support** the application on the following grounds: Effectively utilises allocated employment land in accordance with development plan policies; creates employment opportunities; benefits to the local economy. Recommends that a financial contribution of £250 per full time vacancy and £100 per part time vacancy is secured for SNC Job Club via a planning obligation. Also recommends that SNC Job Club is recognised within the Economic Impact Assessment and requests clarification as to how interventions to benefit the local economy listed in this assessment are to be selected for delivery.

They are also satisfied that the submitted Economic Impact Assessment provides a robust evidence base for the economic benefits of the scheme.

7.40. SNC BUILDING CONTROL: **No objections**. Recommends all surface water to soak away and radon protection.

7.41. SNC LANDSCAPE CONSULTANTS: LANDSCAPE GENERAL **Comments** that the landscaping proposal does not meet the expected standards in the following areas:

- The embankment and bunds along the western and southern boundaries need to be greater in height,
- More landscape planting is needed to integrate Zone A into the wider landscape,
- Further planting is needed on the boundaries of the site,
- More extra heavy duty trees are needed to assist with the integration of the development into the landscape,
- The use of terraces within supporting walling would increase the opportunity for planting,
- Changes to the masterplans would create further landscaping opportunities,
- There is the opportunity for landscape planting in between the plots,
- Further consideration of high carbon capture species is needed.

7.42. The Landscape Consultant concludes that the scheme does not fully meet the tests of the relevant policies relating to landscaping.

7.43. LVIA **comments** (paraphrased):

Requests a number of clarifications regarding the applicant's Landscape Visual Impact Assessment (LVIA) relating to:

Sensitivity - landscape and assessment of susceptibility; visual and the definitions of susceptibility, value and receptor sensitivity;

Magnitude – landscape and reporting of geographical extent/duration/reversibility; visual and the reporting of duration and reversibility and how 'importance' relates to magnitude in the methodology;

Level of effect – 'other factors' should be explained and potentially included in the methodology; character areas need to be mapped; further explanation of value judgements; evidence to support value judgements is needed; evidence of how judgements of levels of susceptibility and sensitivity are made is needed;

Visual – lack of clarity in method; explanation is needed for judgements and on the reporting of sensitivity for viewpoints;

Assessment – inconsistency between labelling of assessment tables and terms used in the methodology; significant effects are unclear due to inconsistencies between the text and the results in the assessment tables; the significance of effect needs to be checked against the main text and updated if necessary; clearer labelling of effects that are judged significant in the tables; reason for the reduction in effect on a number of views needs to be explained; 2 other minor points for clarification

Accurate Visual Representations (AVRs) – Minor points for clarification;

Mitigation and Management – Dealt with in a separate memo;

Non-Technical Summary – Need to clarify which of the effects set out in the NTS are significant and which are not.

7.44. Summary of landscape and visual issues:

Impact on landscape character of Undulating Claylands (Tove Catchment) landscape character area - The resulting impact on landscape character is considered to be significant;

Impact on the character Tiffield Lane and visual amenity of users - This impact on the character of Tiffield lane and the visual amenity of people using the lane is considered to be significant;

Impact on views from public rights of way (PRoW) SB1, SA2, SA4, RK2, SB52 SB32 - These impacts are considered to be significant;

Impact on views from Brickyard Farm - the visual impact on this property as a whole is considered to be significant;

Impact on views from the commercial Variohm property - the visual impact on this receptor is recorded as significant;

Impact on views from the housing estate north of Northampton Road - This impact is considered to be significant;

Impact on views from the A43 - motorists on major roads are not considered to be particularly sensitive receptors but many people will experience views from the A43. Despite proposed planting the buildings will still be prominent as motorists pass the site;

updated comments in response to clarifications:

The Landscape consultant is satisfied with the explanations and amendments provided by the applicants.

7.45. SNC SEQUENTIAL SITE ASSESSMENT CONSULTANT: Makes the following **comments** and recommends the imposition of a **condition**:

The applicant has demonstrated that the proposal is compliant with the sequential approach providing the proposed Class A1 and/or A3 Uses are developed in conjunction with the other employment uses and are not permitted to be developed independently; which has been assumed by the applicant when considering 'sequentially preferable' sites.

Recommends imposing a condition that prevents the development and/or the occupation of any ancillary Class A1 and/or A3 accommodation within Zone A of the site until at least one (or more) of the proposed B1, B2 and/or B8 Uses proposed on Zone B in the application have either been completed or are occupied or when a defined quantum of employment floorspace has been constructed. Without this the sequential site assessment supporting the application could be invalidated and the 'supporting uses' (and specifically the A1/A3 Uses) could be developed independently of the wider scheme. Imposing such a condition would not only ensure that the proposed Class A1/A3 uses are ancillary to the main employment use of the site but also ensure that they are *demonstrably subservient and complementary* the main employment uses - and in accordance with the provisions of Policy AL3.

7.46. SNC LIGHTING CONSULTANT: Makes the following **comments**: The lighting strategy and lighting chapter of the ES should be revised to include the following;

- Obtrusive light calculations for the proposed A43 and roundabout lighting design, demonstrating compliance with E2 Environmental Zone criteria for ULR, Vertical illuminance onto receptor windows and viewed source intensity following the methodology outlined in GN01:2020 – Table 4.
- Include a robust framework outlining the lighting requirements associated with the operational phase of the outline component. This should include typical good practice measures to reduce the potential for obtrusive light to occur. The lighting strategy should include sufficient detail to enable it to be used as a design guide for future detailed lighting design. This should also include technical lighting parameters for the A1 and A3 uses.
- Following the preparation of lighting calculations for the A43 and roundabout, the lighting assessment should be revised to include the quantified likely increase in light levels on receptors, specifically the residential receptors located South of the A43, along with Third Lodge.

7.47. SNC HERITAGE: **Comments:** Considers that the Heritage Assessment is satisfactory and concurs with its conclusions and believes that harm to designated and non-designated heritage assets would be less than substantial. Going forward careful consideration will need to be given to the siting, scale, orientation, height, colour, lighting and landscaping to minimise any impacts.

7.48. SNC ECOLOGY: Makes the following **comments and recommends the imposition of conditions:** Summary:

- The site contains a range of habitats mainly of low ecological value, with the boundary hedgerows being the habitat of greatest ecological importance on site. A range of species are present, of which protected species of Great Crested Newts and Reptiles are likely to be impacted. A range of mitigation measures are detailed which will be consolidated into a final CEMP which will be accompanied by method statements for Great Crested Newts and Reptiles.
- Habitat will be lost resulting in a net loss in biodiversity, however the submitted LEMP and detailed planting plans show where habitats will be created and retained habitats enhanced to reduce the net loss. Further to this in lien with NPPF off site opportunities have been identified where biodiversity enhancement can be secured and managed in the long term to ensure a no net loss in biodiversity is achieved.
- If the mitigation measures contained within the ES and supporting appendices, future CEMP, method statements and LEMP are carried out fully and successfully then the development proposals are not thought to have a significant effect on habitats or protected species.”
- The following conditions are recommended: to require the development to be carried out in accordance with the Biodiversity section of the ES; to prevent site clearance/works without a licence that could affect protected species (bats and newts); to control the provision of external lighting; to require revised ecology surveys within 2 months of commencement; to provide a LEMP; to provide a CEMP; to require native species planting within biodiversity and ecological mitigation areas.

7.49. SNC TRANSPORT CONSULTANT: Makes the following **comments** and recommends **conditions and planning obligations:**

- Further consideration must been given to the matters relating to trip rates and the use classes order before they can confirm that the estimated AM and PM arrival and departure traffic generations are acceptable and whether the transport assessment and environmental assessment are

reliable in respect of: a) Junction and network modelling; b) The impact on the surrounding highway network; c) The potential impact of HGV's on the network; d) Air quality impacts.

- Agree in principle with the approach to matters relating to traffic distribution, traffic assignment and the modelling techniques employed.
- Agree with the proposed form of the A43 roundabout junction as it removes existing potential hazards at the existing A43/Northampton Road priority junction and the existing right turn facility at the A43/Tiffield Lane junction but has some reservations about the design. Recommends that the design is agreed prior to determining the application to ensure that the scheme is deliverable within the application site and public highway and that any matters raised in the RSA that impact on land can be resolved.
- Regarding additional traffic using Northampton Road as a result of the new roundabout they recommend that money for additional traffic calming measures is secured by S106 which should also require the scope of works that the money could be used for to be agreed and set out an agreed monitoring arrangement to determine if any adverse impact needs to be addressed.
- There are some limitations to the Framework Travel Plan relating to parking/modal shift, the diversion of bus services and 'Failsafe Mechanisms'. Recommendations are made about the requirements for bus services within the S106.
- With regard to air quality they consider that any adverse impact would be small and short-lived bearing in mind that the relief road will be provided in due course and that there will be enduring behavioural travel change as a result of the Covid pandemic.
- The TA is robust in respect of the methodology employed relating to: a) traffic distribution; b) traffic assignment to the highway network; c) modelling future years; BUT further consideration is required regarding the proposed uses, their scale and the new use classes order before it can be determined whether estimated traffic generation is acceptable.
- Accepts that the closure of the M1 should not form part of the transport modelling and that it is reasonable for modelling not to assign HGV movements to minor roads.
- Considers that a scheme for calming traffic on Northampton Road could be devised which protects the safety of highway users.
- Considers that the development would have little impact upon journey times on the Brackley Road/Northampton Road.
- Recommends that a Grampian condition is imposed to require a TA and RSA for the A43/Tiffield Road junction prior to commencement.
- Considers that increases in rat-running through Tiffield and Caldecote villages as a result of the development will be modest and will not fundamentally effect safety or the capacity of the associated road network.
- The overall estimated increase in traffic on Tiffield Lane north of the proposed development link road is relatively small but construction traffic should ideally not use the Tiffield Road junction until the A43/Northampton Road roundabout junction has been provided and the gap in the existing A43/Tiffield Rd junction has been closed but if this is not acceptable to the applicant this could be assessed by the TA and RSA to be required by the recommended Grampian condition.

- Recommends that S106 is used to reserve land for access to the sport pitches and a condition could be imposed to require details of how the access could be provided.
 - Does not have any serious concerns about the traffic impact on A43 and the Abthorpe roundabout or on the A43 Blisworth junction.
- 7.50. SNC ARBORICULTURE: Makes the following **comments** and recommends **conditions**: The tree survey is satisfactory and the loss of trees has been minimised. The removal of sections of 3 hedges should be mitigated through ensuring replacement, native species planting elsewhere on the site. Conditions should be imposed to require updated tree protection plans at the reserved matters stages and full landscaping proposals which should incorporate the mitigation/replacement planting for trees and hedges to be removed.
- 7.51. SNC PUBLIC ART: No comments received to date.
- 7.52. SNC HEALTH IMPACT ASSESSMENTS: No comments received to date.
- 7.53. SNC ENERGY CONSULTANT: Makes the following **comments** and recommendations: The Sustainability report does not provide sufficient detail to understand the Energy Strategy and Building proposals in respect to the key Energy and Carbon criteria set out as part of the planning documentation. The report does not provide sufficient evidence identifying what the limitations may have been in the selection of the energy and carbon strategy and why the policy requirements many not have been met. The guidance in particular of Maximising Energy efficiency and Maximising Energy generation on site have not been discussed in sufficient detail to understand the opportunities and constraints. Recommend further information is provided and that electric vehicle charging facilities are made in line with policy.

8. RELEVANT PLANNING POLICY AND GUIDANCE

- 8.1. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 8.2. The Development Plan comprises the West Northamptonshire Joint Core Strategy Local Plan (Part 1) which was formally adopted by the Joint Strategic Planning Committee on 15th December 2014 and which provides the strategic planning policy framework for the District to 2029, and the recently adopted South Northamptonshire Local Plan (Part 2 LP). The relevant planning policies of South Northamptonshire's statutory Development Plan are set out below:

WEST NORTHAMPTONSHIRE JOINT CORE STRATEGY 2014 (JCS 2014)

- SA – Presumption in Favour of Sustainable Development
- S1 – Distribution of Development
- Policy S2 – Hierarchy of Centres
- Policy S7 – Provision of jobs
- Policy S8 – Distribution of jobs
- Policy S9 – Distribution of retail development
- S10 – Sustainable Development Principles
- S11 – Low carbon and renewable energy
- C1 – Changing behaviour and achieving modal shift
- C2 – New developments
- C3 – Strategic connections

- C4 – Connecting urban areas
- C5 – Enhancing local and neighbourhood connections
- RC2 – Community needs
- E1 – Existing employment areas
- E2 – New office floorspace
- BN1 – Green infrastructure corridors
- BN2 – Biodiversity
- BN5 – The historic environment and landscape
- BN7A – Water supply, quality and wastewater infrastructure
- BN7 – Flood risk
- BN9 – Planning for pollution control
- INF1 – Approach to infrastructure delivery
- INF2 – Contributions to infrastructure requirements
- T1 – Spatial strategy for Towcester
- T4 – Transport improvements for Towcester
- R1 – Spatial strategy for the rural areas
- R2 – Rural economy
- R3 – A transport strategy for the rural areas

SOUTH NORTHAMPTONSHIRE PART 2 LOCAL PLAN (Part 2 LP)

- SS1 – The settlement hierarchy
- SS2 – General development and design principles
- EMP1 - Supporting skills
- EMP3 – New employment development
- RET1 – Brackley and Towcester town centres
- SDP2 – Health facilities and wellbeing
- INF1 – Infrastructure delivery and funding
- INF4 – Electric vehicle charging points
- HE1 – Significance of heritage assets
- HE2 – Scheduled ancient monuments and archaeology
- HE3 – Historic parks and gardens
- HE5 – Listed buildings
- HE6 – Conservation areas
- HE7 – Non-designated heritage assets
- NE3 – Green infrastructure corridors
- NE4 – Trees, woodlands and hedgerows
- NE5 – Biodiversity and geodiversity
- NE6 – SSSI and protected species
- AL3 – Land at Tiffield Lane, Towcester

8.3. Other Material Planning Considerations

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- The Planning (Listed Buildings and Conservation Areas) Act 1990
- EU Habitats Directive
- Natural Environment and Rural Communities Act 2006
- Conservation of Habitats and Species Regulations 2017
- Circular 06/2005 (Biodiversity and Geological Conservation)
- Human Rights Act 1998 (“HRA”)
- Equalities Act 2010 (“EA”)

- SNC Corporate Priorities - to ensure the District is “Protected, Green & Clean”, is a place which supports “Thriving Communities & Wellbeing”, and is a District of “Opportunity & Growth”.
- Towcester Masterplan 2011
- South Northamptonshire Design Guide 2017
- SPD Air Quality 2019
- SPD Developer Contributions 2011
- SPD Energy and Development 2007
- SPD Energy Efficiency 2013
- SPD Parking 2018
- SPD Renewable Energy 2013
- SPD Planning Out Crime 2003

9. APPRAISAL

9.1. The key issues for consideration in the consideration of this application are:

- The Environmental Statement
- The Principle of Development
- The Retail Impact of the Development
- The Impact of the Development on the Character and Appearance of the Area
- The Proposed Landscaping Scheme.
- The Impact of the Development on Heritage Assets
- The Impacts on the Highway Network
- The Framework Travel Plan
- The Provision of a Bridge Over the A43
- The Impacts of the Development on the Noise Environment
- The Impacts of the Development on Air Quality
- The Impacts of the Development on Light pollution
- The Sustainability of the Buildings
- The Impact of the Development on Residential Amenity
- The Impact of the Development on Archaeology
- The Impact of the Development on Ecology and Biodiversity
- The Impact of the Development on Drainage and Flooding
- The Impact of the Development on Public Rights of Way
- The Impact of the Development on Agricultural Land
- The Arboricultural Impact of the Development
- The Impacts of the Development on Health
- The Socio Economic Impacts of the Development
- The Local Fund

The Environment Statement

9.2. The application is accompanied by an Environmental Statement (ES). The ES covers the application site and contains information describing the project, aspects of the environment likely to be significantly affected by the development and measures to prevent or mitigate any identified impacts. Where an ES has been submitted with an application the Local Planning Authority must have regard to it in determining the application.

- 9.3. The ES for each chapter considers the impacts and the significance as well as the cumulative effects. It is not possible within this report to set out all of the impacts identified, but below is a summary of the areas covered. The full reports and technical notes can be viewed via the Council's website. It should be noted that all the subject areas set out below are covered in greater detail and conclusions reached later in the report.
- 9.4. Chapter 6 – Traffic and Access – Both the Local Highway Authority and the Highways England have confirmed that they consider the Transport Assessment for the development is an accurate modelling of the highways impacts of the development. The ES states that the impacts for the construction phase on driver delay, Pedestrian Delay, Fear and intimidation and accidents and safety will range from minor/moderate adverse to negligible adverse. For the operations phase of the development, for the same considerations they range from minor beneficial to minor adverse.
- 9.5. Chapter 7 – Air Quality – The main impacts of the development on air quality would be in the Towcester Air Quality Management Area from additional operational traffic movements. Modelling has been carried out to ascertain the impacts of the development, however this takes into account the completion of the relief road around the Towcester South Development which will divert some traffic away from the town centre and assumes the bypass will be usable by 2025 and accepts that the impacts would be greater without the relief road.
- 9.6. With regard to nitrogen dioxide the ES classifies the impacts as small on the A5 north of the Northampton Road and small to moderate on the A5 to the south of the Northampton Road and negligible at locations outside of the AQMA adjacent to the A5, Tiffield Road, Northampton Road and Brackley Road. With regard to particulates the ES predicts the impacts of the operation of the development to be negligible.
- 9.7. Chapter 8 – Noise and Vibration - The ES assessment has involved taking baseline noise survey in an around the application site, so the current noise levels are known during the daytime and night-time and demonstrates the main noise sources are from traffic. The ES also identifies the most sensitive receptors to noise as being Brickyard Farm, Third Lodge, The Shires Estate, the village of Caldecote and Williams Barn. The ES process has modelled the predicted noise from the development during construction and operation phase and sets out mitigation measures. During the construction phase some noise from construction work will be difficult to mitigate but will be short lived. It is also expected that there will be some night time working to construct the roundabout and there will hence be some major short term adverse impacts on dwellings near the development site. In terms of construction traffic Brickyard Farm is identified as the primary dwelling impacted where the level of the impact is significant.
- 9.8. For the operational phase of the development the noise impacts of the development have been modelled based on the illustrative layouts. For the larger units the modelling is limited to that of a warehouse use rather than industrial uses. The modelling shows that mitigation measures will be required including attenuation fencing principally on the western boundary to limit noise as well as other mitigation measures. The ES then predicts the noise levels at the location of the most sensitive receptors and this work shows that significant adverse impacts are unlikely. It also set out that further modelling and sound attenuation measures will be needed as the development comes forwards.

- 9.9. Chapter - 9 Biodiversity – The ES examines the most likely significant impacts of the development on the biodiversity of the site these being
- The loss of linear and nonlinear habitats
 - The loss of supporting habitats
 - Disturbance due to lighting
 - Disturbance due to noise and movement
- 9.10. The ES also examine the impacts on certain species including
- Bats
 - Badgers
 - Otter and Water Vole
 - Brown Hare and Hedgehog
 - Birds
 - Reptiles
- 9.11. The ES concludes that some of the loss of habitat on site is an inevitable consequence of the allocation of the site for development and that development is coming forwards. It is proposed that the loss of the habitats can be compensated for both on site and off site in the medium to long term. These new habitats would also be managed over the long term (up to 30 yrs.). As a result of the mitigation works the ES records that the effects of the development both in the construction phase and operational phase would be minor adverse with no significant effect.
- 9.12. Chapter 10 – Landscape and Visual Impact Assessment – the chapter in the ES looks at the changes the development will make to the landscape and visual environment. When the development is constructed it considers that the impact the residual effect (i.e. the effect after mitigation) on the rural landscape to the north, the townscape of Towcester, Easton Neston and the Tove Valley to be minor to moderate adverse. However, it considers that the effect on the setting on the northern edge of Towcester will be significant.
- 9.13. Chapter 11 – Archaeology – Remains of Iron age and Romano-British settlements, medieval archaeology and industrial archaeology have been identified on the site in two locations through desk-based assessment and field excavation. There is the potential for some of these features to be preserved as they lie within an area of greenspace on the plans however these are not of such significance that preservation in situ is required and they can be recorded. The ES therefore does not identify any significant effects.
- 9.14. Chapter 12 – Built Heritage – The chapter considers the impacts of the development on the main principal heritage assets within 1 km of the site including the
- Easton Neston Registered Park and Garden,
 - Easton Neston Conservation Area
 - Easton Neston House
 - Other listed buildings with the Easton Neston estate,
 - Listed building with Hulcote,
 - Listed building within Caldecote
 - Listed buildings within Tiffield.
- 9.15. Chapter also takes in to account the proposed mitigation including the retention of some boundary planting and the increase landscape planting.
- 9.16. Given the distance between the development and the list of heritage assets above the listed has been further distilled down to

- The Easton Neston Registered Park and Garden
 - Easton Neston Conservation Area and the
 - Hulcote Conservation Area
- 9.17. As there will be an urbanising impact which will be visible from the periphery of the RPG and conservation areas and as the assets are very sensitive to change the impact on the assets are considered to range from minor adverse to moderate adverse.
- 9.18. Chapter 13 – Climate Change – The ES reports that the effects of the development on the release of greenhouse gases during the construction phase would be temporary and minor adverse and this is seen as a foreseeable impact of the allocation on the land for development. In the operational phase the impact of the development the impact of the development on greenhouse gases in the ES is seen as being negligible.
- 9.19. Chapter 14 – Lighting – The ES identifies the site as being with E2 Rural in the Institute of Lighting Professionals Environmental Zone for setting light parameters. It also set out the sensitive receptors including Williams Barn, The Shires Estate, Caldecote and Hulcote. The ES sets out the measures to control light pollution during the construction phase which would be secured through a condition. For the operation phase is sets out that the proposal will follow best practice however higher levels of lighting will be required on parts of the site such as loading bays for health and safety reasons, but lighting may be dimmed or switched off when it is not required.
- 9.20. The ES sets out that the lighting proposal for the A43 have not reached the detailed design stage but would be in accordance with the Design Manual for Roads and Bridges and the Specification for Highway Works.
- 9.21. The ES records that the impacts from obtrusive light range from negligible for the Shires Estate to minor adverse at Williams Barn and Caldecote. The changes in night time scene range from minor adverse at the Shires Estate, Caldecote and Hulcote to major adverse for Williams Barn.
- 9.22. Chapter 15 – Agricultural Land - A survey of the agricultural quality of the land within the site has been carried out and this shows the following
- Moderate quality subgrade 3b – 72% of the site
 - Subgrade 3a – 16% of the site
 - Non-agricultural land – 12% of the site.
- 9.23. (Grade 1 is excellent agricultural Land and 5 is poor. Grades 1, 2 and 3a are defined as best and most versatile agricultural Land)
- 9.24. The ES concludes that there will be moderate effect on the agricultural land given the quality of the agricultural land, however this is an inevitable impact of the land being allocated for development
- 9.25. Chapter 16 – Socio Economics - This Chapter looks at the impact of the development on employment in the locality. Its sets out that there would be a total of 1464 direct new jobs created by the development approx. a total of approx. 540 of which would be taken by Towcester residents.

- 9.26. Chapter 17 – Cumulative Effects Assessment – Thus chapter looks at the cumulative impacts of the development as identified in the previous chapters of the statement. With regard to the proposed development It identifies those who live closest to the site would be the most effected and principally through the construction activities. It also identified at the operation phase that there would be changes to the local air quality and there would be noise and some light pollution coming from the site. It also comments that there are beneficial impacts on local employment within the area.
- 9.27. It also looks at the combined impacts development in combination with other consented developments in an around the locality including the developments at the Silverstone Circuit, Towcester South and HS2 phase 1. This identifies that the combined impacts, it identifies that there are combined negative impacts relating to loss of best agricultural land however there are combined positive impacts relating to the socio-economic impacts.
- 9.28. All new development has some impact. The ES has not identified any significant major adverse impacts and where impacts, for example from construction have been identified mitigation measures are proposed and these will need to be secured through planning conditions or legal agreement. Whether those mitigation measures are sufficient and adequately set out will be discussed later in the report.

The Principle of Development:

- 9.29. The Development Plan comprises the adopted West Northamptonshire Joint Core Strategy (JCS) and the Part 2 LP. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 9.30. The West Northamptonshire Joint Strategic Planning Committee adopted the West Northamptonshire Joint Core Strategy Local Plan (Part 1) on 15th December 2014. The adopted JCS incorporates the Modifications recommended by the Inspector and covers the administrative areas of South Northamptonshire District, Daventry District and Northampton Borough. It sets out the long-term vision and objectives for the whole of the West Northamptonshire area for the plan period up to 2029 and includes strategic policies to steer and shape development.
- 9.31. The Part 2 LP was adopted by the Council on 22 July 2020. The Part 2 LP builds upon the policies of the adopted JCS in providing specific development management policies for guiding planning decisions in South Northamptonshire over the plan period (2011-2029)
- 9.32. The NPPF sets out the economic, social and environmental roles of planning in seeking to achieve sustainable development: Paragraph 8 states that achieving sustainable development is achieved through three overarching objectives an economic objective, a social objective and an environmental objective.
- 9.33. Paragraph 10 of the NPPF sets out that there is a presumption in favour of sustainable development.
- 9.34. The NPPF sets out the Government's planning policies and how they should be applied providing a framework which development can be produced (Paragraph 1). It is split into thirteen key policy objectives to achieve sustainable development, the following of which are considered of particular relevance to the Proposed Scheme:
- Building a strong, competitive economy;
 - Ensuring the vitality of town centres

- Making effective use of land;
- Achieving well-designed places;
- Promoting sustainable transport
- Promoting healthy and safe communities;
- Meeting the challenge of climate change, flooding and coastal change;
- Conserving and enhancing the natural environment; and
- Conserving and enhancing the historic environment.

9.35. Local Planning Authorities (LPAs) are expected to set out a clear economic vision and strategy for sustainable economic growth and to set out policies for the provision of commercial development (para' 20). Local Plans are considered to be the key to delivering sustainable development that reflects the vision, aspirations and agreed priorities of local communities.

9.36. The site is allocated for development within the Part 2 LP; Policy AL3 states:

POLICY AL3: LAND AT TIFFIELD LANE, TOWCESTER

- 1. Development description: located to the north of Towcester, and the A43 the allocated site provides for 21ha of new mixed employment generating development.**
- 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. A new roundabout facility will be provided at the junction of the A43 and the Northampton road (Hulcote Turn) and the layout of the proposal will enable the closure of the central reservation turn at the Tiffield Lane junction in order to improve road safety on the A43; 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 to 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 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 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 including the protection of the Green Infrastructure Corridor identified in Policy NE3 that crosses the site.**

9.37. Looking at points 1, 2 and 3 of the policy above:

9.38. Point 1: The allocation does allow for the development of the site as shown in the local plan and the area for the construction of the proposed unit does tie in within the area shown in the plan that is associated with the Local Plan.

9.39. Point 2: The masterplan submitted to the Council prior to the submission of the application and officer and members and other stakeholders were given the opportunity to make comments upon the submission. However, the masterplans remain only indicative at this time and the layout of development parcels remains a reserved matter.

9.40. Point 3: The application does include an independent market assessment which concludes that it is difficult to come to an exact assessment of what the market would desire at this location but a split of 50% B8 use and 50% B1/B2 used could be obtained. However crucially the report also concludes that as it is difficult to predict the market a flexible approach should be taken.

9.41. The application does propose that 30% of the land area of the development parcels be brought forwards as B2 or B1 uses and this is a large proportion of the site and it is in keeping with the recommendation of the market assessment, given the flexible approach the market assessment states would be necessary on the site.

9.42. The proposed uses (outside the business use class) for Zone A being retail (up to 1000sqm) restaurant, car show room and petrol filling station, are considered to be subservient and complementary within the meaning of the policy.

9.43. In summary the proposal accords with points 1-3 of policy AL3 which allocates the site for development and it is therefore considered that the principle of development is acceptable. Points 4 and 5 which deal with the nature of the proposals and its impacts are covered in other sections of the report.

The Retail Impact

- 9.44. The application proposes up to 1000 square metres of retail and restaurant space, which includes any retail space that might be provided within the petrol filling station. It is not currently known what form this retail space will take and that will be a matter to be decided at the reserved matters stage.
- 9.45. Policy S9 of the JCS requires retail development over 1000sq metres outside identified shopping areas to be subject to an impact assessment to demonstrate they do not have a significant adverse impact on the shopping areas. Policy RET 1 of the Part 2 LP supports a town centre first approach to retail development. Paragraph 86 of the NPPF requires Local Planning Authorities to apply a sequential test to planning application for town centre uses which are neither in an existing centre nor in accordance with an up to date plan.
- 9.46. The applicant has therefore submitted a sequential test, which covers both the retail and restaurant uses, with their application which examines other sites nearer to the town centre to examine whether they are suitable or available to accommodate the proposed retail/restaurant uses. However, the policy allocation does allow for subservient and complementary uses which does not exclude retail/restaurant uses, therefore there is an argument that policy AL3 already allows for an element of these uses on the site.
- 9.47. Officers have identified other sites which should be examined to ascertain if they are suitable or available and these have been included in the test, these being:
- The former Co-op site – Richmond Road
 - The new basket store, corner of Watling Street and Northampton Road
 - Land at the northern end of Old Tiffield Road
 - Land to the north of Tesco, Old Tiffield Road
 - Paynes Nurseries, Watling Street
- 9.48. The applicant's sequential test concludes that former Co-op site is not available whilst the basket store, the site at the northern end of Old Tiffield Road, the land to the north of Tesco and the Paynes Nurseries site are neither available nor suitable to accommodate the retail element as proposed in the application.
- 9.49. The Council has employed the consultant Chase and Partners to assess the sequential test and has confirmed that the test does demonstrate that the Co-op site, the basket store site, the Paynes Nurseries site, the site at the end of Old Tiffield Road and the land adjacent to Tesco should all be discounted as not suitable and/or available. Moreover, neither site on the Old Tiffield Road can be considered to be within or adjacent to the town centre so, in locational terms, can only be considered perhaps marginally preferable to the application site.
- 9.50. It is therefore considered that the applicant has properly examined and discounted other sites closer to the town centre and hence the quantum of retail and restaurant floorspace applied for in the application is acceptable. However, the application makes it clear that these uses are there in part to serve the needs of the development and therefore as such the provision of the floor space needs to be conditioned that it is provided along with the business floorspace and is not developed in isolation.

The Impact on the Character and Appearance of the Area

- 9.51. The applicants have undertaken a Landscape and Visual Impact Assessment (LVIA), submitted as part of the Environmental Statement. The landscape assessment addresses the effect of change that a development may have on the landscape and includes evaluating the landscape component and features; the

townscape character of the area; and, the aesthetic and perceptual aspects of the landscape.

9.52. Policies S1 and S10 of the Joint Core Strategy and policies SS2 and NE4 of the Part 2 LP look to protect the rural landscapes of the district from inappropriate development. Paragraph 127 of the NNPF states that decisions should ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting.

9.53. The LVIA looks at the visual impact of the development including within the site itself and the surrounding landscape over which the development may have a significant effect in either landscape or visual terms up to 3 km from the edge of the site.

9.54. As well as looking at the landscape impacts it also examines who would be most sensitive to changes within the landscape as set out below:

	Type of Visual Receptor
Most Sensitive	<ul style="list-style-type: none"> • Residents at home • People engaged in outdoor recreation (including PROW), whose attention or interest is focused on the landscape • Visitors to heritage assets • Communities where views contribute to the landscape setting
Moderately Sensitive	<ul style="list-style-type: none"> • People travelling through or past the affected landscape in cars, trains or other transport routes • People engaged in outdoor sport or recreation other than the appreciation of the landscape
Least Sensitive	<ul style="list-style-type: none"> • People at their place of work whose attention may be focused on their work or activity and may be less susceptible to change in the view

9.55. The 3km study zone includes 27 different viewpoints some of the most notable include:

- The footpaths to the south and east of Caldecote
- Tiffield Lane
- Brickyard Kennels on Tiffield Lane
- The southern edge of Tiffield
- The Easton Neston estate
- Easton Neston Manor
- The Shires housing estate
- The Tove roundabout.
- Towcester Racecourse

9.56. The Council has employed Land Use Consultants to critically examine the submitted LVIA. They have no criticisms of the methodology used in compiling the LVIA only certain clarification have been requested, for the sake of completeness, these have now been submitted and the consultants are now satisfied that the clarifications are acceptable and answer the outstanding points.

9.57. For the purposes of the report the impacts of the development have been split into key landscape locations based upon the comments of the Council's consultants.

- 9.58. The comments below assume that the development that comes forwards incorporates the maximum amount of development allowed within the submitted parameters plan.

Impact on the wider landscape

- 9.59. It is inevitable that the development of this site will result in a localised impact on the character of the landscape in which this proposal sits. The scale of the parameters means that change to the character of the landscape immediately around the site will be large in magnitude, although for a development of this scale the impacts are relatively localised. The influence on character will be experienced up to around 1km to the north of the site, with greatest visibility within 500 metres. Although there will be some visibility from rising ground to the north, views from the villages of Caldecote and Tiffield will generally be screened by the intervening ridge, vegetation and buildings. The extent of influence to the east, south and west will be limited by the woodland along the A43 and edge of Towcester to the south and by existing woodland to the west.

Impact on the character of Tiffield Lane

- 9.60. Some of the largest impacts will be experienced along Tiffield Lane where the proposed buildings and retaining structures will be in close proximity to the lane and the change in level from the lane to the site will be marked. While mitigation will assist with retaining the character of the lane it is inevitable that the buildings will be dominate the eastern side of the lane and fundamentally change the rural character of the lane.

Impact on views from public rights of way

- 9.61. SB1 links Tiffield Lane to Caldecote, SA2 links Caldecote to Tiffield, SA4/ RK2 link Tiffield to the A43, SB52 links the Industrial area on the west of Towcester, across the A43 and onto Tiffield lane and SB32 is the footpath that crosses the site from Tiffield Lane, across the A43, to the housing estate on the northern edge of Towcester.
- 9.62. There will be some clear views of the proposed buildings from SB1 when walking south, especially when nearing the site. There will also be some views of the tops of buildings from footpath SA2 between Caldecote and Tiffield. There will be some views of the proposed buildings south of High Hey Spinney on SA4/ RK2 and some very clear views from the part of SB52 that descends to the A43, although this view will be in the context of the busy A43. SB32 will be diverted as part of the proposals and will therefore be directly affected.

Impact on views from Brickyard Farm

- 9.63. There will be views of the proposed buildings behind the acoustic fencing and new landscape treatments along Tiffield Lane from the driveway of, and the most easterly building within, Brickyard Farm during summer. Other buildings are likely to be shielded by vegetation along the disused railway and adjacent woodland in summer, although in winter there are likely to be views of the top parts of the large scale buildings through the trees from the outdoor areas around the buildings albeit over time the coir coated acoustic fence and stepped retaining wall/ proposed planting will screen the lower parts of the buildings. Views from the main residential building are likely to be screened by woodland.

Impact on views from the commercial Variohm property (Williams Barn)

- 9.64. There will be an inevitable change in views from this property due to its close proximity to the site. However, the sensitivity of this place of employment is not as high as a residential receptor.

Impact on views from The Shires

- 9.65. The top of the building parameter will be visible from the open space within the housing estate on the northern edge of Towcester. There will also be views from upper storey windows of individual residences. Any proposed scheme is unlikely to fill the whole parameter but nonetheless the tops of the proposed large-scale buildings on this site are anticipated to be visible from this residential area. As only the tops of buildings will be seen and therefore the visual impact is therefore not of the highest level.

Impact on views from the A43

- 9.66. There will be an inevitable change to views from the A43, but this change will affect a relatively short section of the A43 – most notably as cars approach the western edge of the site when travelling east and as they approach the eastern edge of the site when travelling west. The new roundabout on the A43 will also change the existing road layout and result in some loss of roadside vegetation (which will be replaced). Any changes will be seen in the context of this busy road. Although motorists on major roads are not considered to be particularly sensitive receptors, many people will experience views from the A43. Proposed planting will reduce and soften the impacts of the large scale buildings as viewed from this road (this is easier to achieve on the eastern edge of the site than the west due to topography), but the buildings will still be prominent as motorists pass the site.

Easton Neston Registered Park and Garden

- 9.67. The LVIA has shown that there will be some glimpsed views of the top of the built parameters from a small part of the Easton Neston registered park to the south east of the site, this area also falls within the Tove Valley special landscape area. However, the maximum parameters are unlikely to be built out in their entirety and once the trees in these views have grown a little taller the proposed buildings are unlikely to be readily noticeable. The viewpoints also show that views from the central and eastern parts of the registered park will not be affected

Conclusion

- 9.68. Any industrial uses on this site will result in an adverse effect on the rural character of the area some of which are considered to be significant, however some significant impacts will be an inevitable consequence of developing the site in line with Policy AL3. These adverse impacts of the development need to be weighed against the benefits of the development and this will be discussed later within the report.
- 9.69. However, at the detailed design phase there are measures that can help to integrate these large buildings into the landscape such use of appropriate building forms avoiding bland rectangular blocks creating some visual interest, colours (for example breaking up large building masses by coloured banding), materials that reflect the rural location, appropriate landscape treatment and sensitive design of

lighting. Officers have therefore secured changes to the Design and Access to ensure these are delivered.

The Proposed Landscaping Scheme:

- 9.70. Policy SS2 and NE4 of the Part 2 LP requires suitable landscaping as an integral part of the development. Policy AL3 which allocates the site for development requires a high quality landscape setting.
- 9.71. As stated earlier in the report the application is in a hybrid form, and the majority of the landscaping around the periphery of the site which is proposed to provide an adequate setting and soften the visual impact is provided as part of the full application, this is known as the strategic landscaping.
- 9.72. There are two different masterplans submitted one for two units located in the south west of the site and one for a single unit. The single unit scheme requires a larger and therefore higher terrace to be created and this is, in some areas approx. 3 metres higher than the terrace for the multi-unit scheme. This makes the single unit scheme more difficult to landscape effectively. Furthermore, the single unit scheme does not give over any more land to landscape the site and in some areas less.
- 9.73. Along the southern boundary of the site there is considerable semi mature landscaping, and this already goes some way to softening the development. The application proposes to enhance the landscaping along the length of the site. The approach along the site varies as the proposed land levels changes along the length of this boundary.
- 9.74. At the south west end of the site boundary the scheme largely relies on the existing planting on the A43 to provide strategic landscaping with a retaining structure with trailing planting and with a belt of planting sitting in front of a 5 metre acoustic fence. Going in a northerly direction from the point on the A43 the new landscaping becomes wider as the existing planting becomes less dense and as the land level between the site and road become less the supporting structure is replaced with a landscaped incline or a planted bund.
- 9.75. The corner of the A43 and Tiffield Lane is the lowest point of the site and for engineering reasons is the location of the landscaped flood attenuation feature and this creates a degree of physical separation of the development from Tiffield Lane. Nevertheless, a considerable change in levels needs to be accommodated in this area a rise of seven metres from Tiffield Lane to the terrace for the single unit scheme. Rising from the attenuation feature the landscaping cross section shows an incline of 1:3 to a 3 metre high retaining wall with a 6 metre high noise attenuation located on the top of this structure.
- 9.76. Proceeding in a northerly direction Tiffield Lane and the development site converge and there less room to address the levels changes between Tiffield Road and the development site. At this point at grade landscaping and landscaped crib wall is used to create the land differences between the road and the site. An acoustic fence is still required, however at this point it is proposed that this is faced with climbers on a coir screen to soften its impact.
- 9.77. Further north along the Tiffield Lane, the road rises above the terrace level for the development by approximately 2 metres and the development is softened by the exiting planting along Tiffield Lane and additional landscape planting.

- 9.78. Along the north boundary the terrace level is set some 3-5 metres below the existing land levels and the changes are secured through retaining structures. Further landscape planting is proposed on the higher levels of the land
- 9.79. Further landscaping and hedge planting are proposed on the north east boundary of the site to soften the impact of the development on Zone A from views from the A43.
- 9.80. The Council has employed the services of Land Use Consultants (LUC) to examine the landscaping proposals for the site and their response is summarised earlier in the report.
- 9.81. They have stated that the landscaping proposals do not go far enough to satisfactorily landscape the proposed development in that a greater level of planting is required and that the species should have a greater ability to capture carbon. In addition, greater height is required for the landscaping in the form of extra bunding at the south west corner of the site and along the more exposed boundary of the A43.
- 9.82. The consultant also considers that more robust landscaping is required along the north eastern boundary and the northern boundary to assist in settling the development into its surroundings.
- 9.83. The landscape consultant has also made comments relating to the layout of the buildings in the masterplan. However, it should be remembered that the layout drawings are indicative only at this time and are not being considered as part of this application and will be considered at the reserved matters stage.
- 9.84. Officers have examined the proposals and the comments of the Landscape Consultant who have given a clear steer on how the proposals can reach an acceptable standard. One of the challenges of the site is that the land levels change by 21 metres across the site and therefore it is inevitable that the terrace at the south west corner will be rising out of the existing ground levels. This means that getting a landscaping scheme that works effectively at this corner of the site is difficult to achieve. Nevertheless, having spoken to the applicants there is a willingness to re-examine the landscape proposals and make changes to address the comments the Council has received.
- 9.85. It is accepted that this landscaping will predominantly only impact the development as viewed from the A43, Tiffield Lane and from other short and medium distance views and that drivers on the on the A43 and Tiffield Lane are not classified as very receptive to changes in views. Nevertheless, the policy that allocated the site for development requires that the development needs to deliver a high quality landscape setting and this is the objective that Officers seek to achieve.
- 9.86. Officers are therefore seeking delegated authority to carry on negotiating with the applicants to seek the necessary improvements which it is confident can be achieved. If these cannot be achieved, then the development will be returned to the committee for determination.

The Impact on Heritage Assets:

- 9.87. Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in carrying out its functions as the Local Planning Authority in respect of development in a conservation area: *special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*

- 9.88. Likewise Section 66 of the same Act states that: *In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority...shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.* Therefore, significant weight must be given to these matters in the assessment of this planning application.
- 9.89. Paragraph 192 states that in determining planning applications, LPA's should take account of the desirability of sustaining and enhancing the significance of the heritage asset and putting them into a viable use consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities and the desirability of new development making a positive contribution to local character and distinctiveness.
- 9.90. Conservation Areas and Listed Buildings are designated heritage assets, and Paragraph 193 of the NPPF states that: when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Policy BN5 of the JCS 2014 echoes this guidance.
- 9.91. Paragraph 193 of the NPPF categorises harm to the heritage assets as
- Less than substantial harm.
 - Substantial harm.
 - Total loss.
- 9.92. Policy BN5 of the JCS seeks to protect designated and non-designated heritage assets and their settings and landscapes in recognition of their individual and cumulative significance and contribution.
- 9.93. Policies HE1, HE5 and HE6 of the Part 2 LP guide development affecting designated and non-designated heritage assets and their settings including conservation areas and listed buildings. Policy HE2 covers Scheduled Ancient Monuments and Archaeology, Policy HE3 Historic Parks and Gardens, and Policy HE7 Non-Designated Heritage Assets.
- 9.94. The NPPF sets out a significance-based approach to planning decisions, requiring sufficient evidence of the assessment of the significance of the heritage asset to be weighed against the benefits of the proposal delivering sustainable development. The NPPF advocates the grant of planning permission (for sustainable development), unless substantial harm to or loss of a heritage asset can be demonstrated as a result of the proposal.
- 9.95. Annex 2 of the NPPF defines heritage assets as:
- A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).*
- 9.96. Designated heritage assets are defined as World Heritage sites, Scheduled Monuments, Listed buildings, Protected wreck sites, Conservation Areas, Registered parks and gardens and Registered battlefields.
- 9.97. Planning Practice Guidance defines non designated heritage assets as *Buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning*

decisions but which do not meet the criteria for designated heritage assets. In some areas, local authorities identify some non-designated assets as "locally listed"

- 9.98. This section will deal specifically with above ground designated and non-designated heritage assets. Matters relating to archaeological assets will be addressed later in the report.
- 9.99. The application includes a comprehensive Heritage Assessment as required by policy AL3 of the Part 2 LP.
- 9.100. The study area for the heritage assessment is 1km from the application site and identifies the main designated heritage assets as
- Tiffield, Hulcote and Easton Neston Conservation Areas
 - Easton Neston Registered Park and Garden – Grade II*
 - Easton Neston House – Grade I listed
 - Garden House at Easton Neston – Grade I listed.
 - Church of St Mary (Easton Neston) Grade I listed.
 - 5 Grade II listed dwellings at Tiffield.
 - 4 Grade II listed dwellings and a grade II listed barn at Caldecote
 - 15 Grade II listed dwellings at Hulcote.
 - A further 3 grade II listed buildings at Easton Neston.
- 9.101. A number of other designated heritage assets have been excluded from the assessment as they will not experience effects from upon their significance due to the lack of visibility between the asset and the application as a result of intervening built form, distance, vegetation and topography.
- 9.102. In considering the effects of the development upon the identified heritage assets it should be noted that permission for the majority of the built form is sought in outline in order to facilitate a flexible and adaptable approach which is required to deliver a complex scheme of this nature. The assessment of effects therefore considers the worst-case scenario which assumes maximum height and scale parameters for each development zone.

Impacts on Easton Neston Registered Park and Garden (RPG)

- 9.103. The development will be visible from the northern part of the Registered Park and Garden (RPG) but will not impact upon the central core of the RPG, however the proposed buildings will be largely screened by existing trees within the RPG and enclosing the A43. Further impacts will be created by the proposed new roundabout which will introduce additional infrastructure, movement and lighting which will further alter the character of the landscape and views in this part of the RPG.
- 9.104. Impacts to the RPG are confined to the most northern part of it and due to the dense plantations to the north of the RPG the development will not affect or be visible from the central core of the registered area. Furthermore, it will not affect the ability to appreciate the high status designed landscape, or the composition of features within it. It will also not affect appreciation of the further buildings and features which illustrate the function of the estate, such as the lodges and approaches.
- 9.105. Whilst the development will result in change visible from the RPG, it is considered that as a result of the urbanising effect caused by visibility of the buildings and roundabout, and the changes to the experience of the approach to the estate there will be some degree of harm to the character of the Easton Neston Registered

Park and Garden. However, the impacts are limited only to the northern most part of the RPG and the harm caused is concluded to be less than substantial harm in NPPF terms.

- 9.106. The Council has consulted Historic England on the application and they also conclude that the harm to the RPG will be less than substantial and as such they raise no objection to the proposed development.

Easton Neston Listed Buildings

- 9.107. This section looks at the impact on the Easton Neston House (grade I) the Tennis Court (grade II) stable block (grade II) and garden house (grade I) These buildings are enclosed by dense plantations of trees including The Wilderness and Ash Plantation, which create an enclosed character, truncating views into the wider landscape.

- 9.108. Due to the arrangement and enclosed character of the complex of listed buildings, the existing topography and the surrounding plantations of trees, the development will not be visible from the listed buildings, the formal area which immediately surrounds them or from the central part of the designated estate.

- 9.109. The development will result in a change in the setting of the Easton Neston buildings, changing the character of the northern approach to introduce some urbanising impacts when approaching from the A43. However, this represents a peripheral part of their setting. It is concluded that the development will therefore result in a neutral impact to and preserve the significance of the Easton Neston listed buildings.

The Church of St Mary (grade I)

- 9.110. The church is located to the centre of the Easton Neston estate, to the south of the complex of listed buildings discussed above. Due to the intervening topography and buildings, as well as the dense plantations of trees in the surrounding landscape there will be no visibility of the development. For these reasons it is concluded that there will be a neutral impact on significance and the significance of the Church of St Mary would be preserved.

The North Lodge and gates and South Lodge and gates

- 9.111. These grade II listed buildings and structures are located on Northampton Road on the boundary of the Easton Neston RPG. They are located in an area defined by urban development including Northampton Road and residential development. There will be no views or glimpsed views from these locations and therefore it is considered there will be neutral harm to the setting of these buildings and the significance of these buildings and structures will be preserved.

Hulcote Conservation Area

- 9.112. The development will be visible from the west boundary of the conservation area, and from the land between the conservation area and application site in which both the site and the edge of the conservation area are visible. However, these views will be screened by existing and proposed planting which encloses the A43 and will only be glimpsed, with buildings being visible between trees, and a horizontal aspect being introduced. The proposed roundabout will result in a change in the character of the landscape visible from the western edge of the conservation area.

9.113. Whilst the development will be visible from the edge of the conservation area, there will be no views from the central part of the designated area, including from the green at the village centre, or from the immediate surroundings of the principal buildings in the village. However, the development will result in change in the setting of the Hulcote Conservation Area, arising from the increased visibility of built form from its west boundary and alteration to the character of the access to it which will have some negative impacts. As a result of these changes there will be a limited degree of harm to the conservation area, though for the reasons set out above this less than substantial harm in NPPF terms.

Tiffield Conservation Area

9.114. The development will not be visible from within the boundaries of the conservation area due to the heavily enclosed character of the village, created by surrounding topography, trees and the arrangement of buildings within it. The development will therefore result in a neutral impact on the significance of the conservation area and its significance will be preserved.

Tiffield Listed Buildings

9.115. The heritage assessment confirms there is no visibility of the site from the vicinity of listed buildings within the village of Tiffield. As a result, there will be no change to the way in which the buildings are appreciated or to those aspects of setting which contribute to their significance hence there will be no impact on significance as a result of the development.

Caldecote Listed buildings.

9.116. The village of Caldecote contains a number of listed buildings which are arranged either side of the lane which travels north-south through the village. There may be some glimpsed views from of the development from the road frontage from Mops Cottage and Springfield Cottage and The Cottage, however these will be limited due to the topography of the land the landscape and landscape features. So hence whilst the setting of these listed building will be impacted it there will be little or no harm to the setting of the buildings and the significance of the heritage assets will be retained.

Hulcote Listed Buildings

9.117. The settlement contains a number of listed buildings, to the west of the settlement is a further group of listed buildings, to the south of settlement are further two listed buildings.

9.118. The development will not be visible from the central part of the settlement and therefore the listed buildings in this locality will not be impacted by the development. The site will also not be visible from the listed buildings located to the south of the settlement. Hulcote Lodge is located to the west side of The Green and from this location there will be long distance views of the development filtered by the landscape and trees. It is therefore considered that there will be no harm to the setting of these listed buildings and as such the significance of these heritage assets will be sustained.

Non Designated Heritage Assets

9.119. The Council's Conservation Officer has identified Third Lodge located near the junction of the Hulcote turning on the Northampton Road as a non-designated heritage asset. Third Lodge has none of the architectural merits of the other

buildings being more modest in design. Its significance lies mainly in its historic role of marking the edge of the historic parkland along one of the main entrance. This significance will not be altered by the proposed development.

Conclusion

- 9.120. Based on an assessment of the significance of the designated heritage assets including the contribution that elements of setting, it is concluded that the development as proposed will have no harmful impact on the listed buildings considered or the Tiffield Conservation Area.
- 9.121. It has been concluded that the development would result in harm to the significance of Easton Neston RPG, Easton Neston Conservation Area and Hulcote Conservation Area. When considering the significance of these assets, this harm is considered to, in NPPF policy terms, constitute 'less than substantial' harm.
- 9.122. Where less than substantial harm is identified, Paragraph 196 of the NPPF requires that this should be weighed against the public benefits of the proposal and this will be covered later in the report.

The Impacts on the Highway Network:

- 9.123. Policy SS2 of the South Northamptonshire Local Plan states that development needs to have a safe and suitable means of access for all people (including pedestrians cyclists and those using vehicles). Policy AL3 of the Part 2 LP, which allocates the site for development, states the development shall include a new roundabout at the junction of Northampton Road and the A43 and the application shall include a Transport Assessment and Travel Plan to assess the transportation implications of the proposed development and to identify appropriate mitigation measures
- 9.124. Paragraph 102 of the NPPF states;
- Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
- a) *the potential impacts of development on transport networks can be addressed;*
 - b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
 - c) *opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
 - e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places*

- 9.125. Paragraph 102 of the NPPF states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 9.126. Paragraph 108 of the NPPF requires that In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that safe and suitable access to the site can be achieved for all users and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 9.127. Paragraph 109 of the NPPF states Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be **severe**. (Officer's highlighting)
- 9.128. The section of the Planning Practice guidance on Travel Plans, Transport Assessments and Statements in paragraph 15 states in general, assessments should be based on **normal traffic flow and usage conditions** (eg non-school holiday periods, typical weather conditions) but it may be necessary to consider the implications for any regular peak traffic and usage periods (such as rush hours). (Officer's highlighting)
- 9.129. In accordance with Local Plan policies and government guidance a full detailed Transport Assessment (TA) has been submitted with the application which has been the subject of extensive pre application discussions with Highways England and the Local Highway Authority.
- 9.130. The main access to the development will be via a new four arm roundabout at the junction of the Northampton Road and the A43 and the provision of this is required as part of the development by policy AL3 of the Part 2 LP. Further access to the site will be possible via Tiffield Lane, however the junction of Tiffield Land and the A43 will be amended to left in and left out only and the island in the central reservation of the A43 will be closed.
- 9.131. The TA also includes information on personal injury collision data for 2014 to 2018. There were ten collisions at this junction. There was one collision resulting in a fatal injury, a further 3 resulting in serious injury and the remaining resulted in slight injuries. The majority of the collisions were recorded when vehicles were pulling out of the junction onto the A43.
- 9.132. On Northampton Road a new combined footpath/cycleway will be provided from the new roundabout to the roundabout on Northampton Road The proposals include two "build outs", the first of which, adjacent to 2 Herbert Gardens will require traffic coming into the town to give way to traffic coming out and will also create an additional pedestrian cross point. The second will be located near to 63 Northampton Road and will require traffic going out of the town to give way to traffic coming in and again will provide an additional pedestrian crossing point. These works will help to reduce speeds on Northampton Road and make it a less attractive alternative route to the A43.
- 9.133. The application also includes two options for a new traffic light controlled pedestrian crossing. The first (north) option would be to have the crossing located adjacent to the Towcester long stay car park. The second (south) option would be to have the cross located at the point where the footpath from Old Tiffield Road

meets the Northampton Road. Should the application be approved members views on the preferred option are sought.

Traffic Generation

- 9.134. The planning application seeks permission for light industrial (B1), General industrial (B2) and warehouse and distribution (B8) uses with ancillary offices across the employment site. It was agreed with the two highway authorities that to ensure a robust assessment of the potential future traffic generation of the proposed development the site will be tested as a B2 use due to the greater level of associated traffic generation. In addition, some complimentary roadside uses will be included within the proposals. Therefore, the associated trip rates for a petrol filling station and drive-thru are included given they attract the greatest level of traffic through the site access roundabout of those uses being applied for.
- 9.135. The TA predicts the traffic generation over a 12 hour period from 7am to 7pm when the roads will be in maximum use by other road users and therefore the times when the development will have the greatest impacts. The vehicles trips are also split into LGV movements, vehicles under 3.5 tonnes, including cars and vans and HGV's, vehicles over 3.5 tonnes. The peak hours for traffic flows are identified as being morning 8am to 9am and evening 5pm to 6pm.
- 9.136. For LGV's a total of 5438 traffic movements are likely to be created over the 12-hour period with 565 movements in the morning peak and 563 in the evening peak. For HGV's a total of 456 movements are predicted over the 12-hour period with 40 in the morning peak and 21 in the evening peak. The peak hour for HGV traffic flows are between 10am and 11am.
- 9.137. In terms of modelling the impacts of modelling these additional traffic movements these have been tested using Northamptonshire Strategic Transport Model 2 and the VISSIM micro simulation model. In addition, the applicants have been made aware of other developments that have been granted planning permission and the traffic flow from these have been included in the modelling. These include the Northampton Rail Freight Interchange and the HS2 construction traffic. The traffic modelling created for the development is able to assess how the traffic will move through the local road network and therefore predict how many traffic movements will occur on each highway in and round the development. Both the Local Highway Authority and Highways England consider the TA to be robust and correctly predict the traffic impacts of the development when modelled for a B2 (general industrial) use.

Conflicts between the TA and the application

- 9.138. There have been comments raised by the Local Highway Authority (LHA) about whether the description of uses in the Transport Assessment matches the uses described in the planning application in relation to stand alone offices. The application makes references to stand alone office uses on site whilst the this is not explicitly mentioned in the TA. However, the parameters plan submitted makes it clear that this is limited to 2400 Sqm of office space as one of the potential uses for Zone A.
- 9.139. The LHA in their consultation response have confirmed that up to 2400 sq. meters of standalone office space as a main land use in within the parameters of the TA. In addition, having discussed this matter further with the Council own transport consultant they also consider that provided the stand alone office use is limited to 2400sq metres that this is within the parameters of the TA. This limit can be controlled through the parameters plan and by an additional planning condition.

The Modelling of HGV movements

- 9.140. The Transport assessments need to model the worst-case scenario resulting from the proposed mix of uses for the site. For this it has been assumed that the whole site would come forward with a B2 (general industrial use) as this use has the highest number of traffic movements associated with it. However, further work needs to be carried out as whilst the B2 use modelled might create the highest total traffic count B8 (warehouse and distribution) might create higher levels of HGV use and this needs to be understood.
- 9.141. The recommendation for the application required further information to be submitted to address this point satisfactorily before any planning permission is granted. The remainder of this section of the report needs to be read with that caveat.

Modelling of displaced M1 Traffic

- 9.142. There have been a number of objections relating to the application which assert that the TA is defective as it does not model what happens when the M1 is constrained or closed and traffic diverts onto the A43. This is of concern to residents as it then leads to the A43 becoming very congested and in turn lead to motorists looking for alternative routes through Towcester and the surrounding villages in particular Tiffield and Caldecote.
- 9.143. As set out above the Government has set out advice in Planning Practice Guidance setting out the methodology for Transport Assessments. This states TA's should be based on normal traffic flow and usage conditions. Given that problems on the M1 displacing traffic are not a normal everyday occurrence, therefore, under government guidance, there is no need to model these events. In addition, it should also be considered that the proximity of the development to the M1 and the traffic impact upon the A43 would have been known when the site was allocated for development in the Local Plan.

Impacts on Northampton Road

- 9.144. The development will result in addition traffic movement on the Northampton Road both from the traffic associated with the development and with the change in behaviour associated with the introduction of the new roundabout junction. This has been modelled for the completion of the development and for year 2031 which picks up the additional traffic movements from other committed development locally.
- 9.145. The modelling shows that as a result of the development in the AM peak northbound traffic increased from 70 to 145 movements and south bound traffic increases from 261 to 345 traffic movements. In the PM peak northbound traffic increases from 137 to 245 traffic movements and south bound traffic increases from 125 to 257 traffic movements. However, despite the additional traffic the journey time implications are not significant being 30-60 seconds on south bound traffic into Towcester in the AM peak period. In terms of traffic movements north, the new roundabout will vastly reduce delays and create a much safer junction that has been the subject of serious road traffic incidents. The traffic flows do also increase on the road as a result of other committed development in 2031 but remain with the capacity of the road.
- 9.146. The developers have in addition offered mitigation works to calm traffic speeds, as set out earlier in the report, to make the route less attractive to through traffic and aid the crossing of the road by pedestrians in three separate locations. These

works will be secured by way of a S106 agreement. In addition, it is proposed that should further work be required on the Northampton Road, which becomes apparent after the development is operational, these works will be designed and secured through a S106 agreement.

- 9.147. As part of the development the applicant are proposing a new signalised crossing and two locations are suggested as set out above. The south option has advantage in that it connects with the network of footpaths through to the Old Tiffield Road and into The Shires estate and also provides pedestrian access, through the rear of the site, to the new Tove Valley Centre (TVS) which is currently under construction. However, this location has the disadvantage that the footpath through the meadows can flood making it unpassable at times, often for several days in a row.
- 9.148. The northern option lies outside of the area that floods on a more frequent basis but only provides access to the long stay car park and does not provide access to the wider footpath network or to the TVS. However, one of the conditions on the TVS planning permission does require a scheme to be submitted in relation to the use of the long stay car park, and links between the two can be covered as part of the discharge of that condition.
- 9.149. Nevertheless, it is considered that the best solution would be the north option and improve the connectivity of the crossing by extending a footpath along the south boundary of the car park to connect to the existing footpath or to take a new link through the car park. Having discussed the matter with the applicants they are willing to consider these options. If these cannot, for whatever planning reason be delivered, then it is considered that the south option should be pursued.
- 9.150. Therefore, Officers will continue to negotiate on this point to secure the most appropriate solution to location of the crossing based on the above consideration of the issues. This can then be delivered through the S106 agreement.

The impact of the development on the Towcester Relief Road.

- 9.151. Concerns have been raised in the constructing a roundabout on the A43 junction with Northampton Road it creates a new attractive route for traffic traveling north into the town on the A5 wanting to travel north on the A43. This would result in increasing traffic through town instead of using the new relief road.
- 9.152. No exact traffic modelling is available for this however this would be an inevitable consequence of the constructing the new roundabout. This is required by the policy and would have been evident at the Local Plan inquiry stage and been viewed as part of the planning balance in deciding to allocate the site for development. It is therefore considered that this is not a matter that can be objected to at the planning application stage.

Impacts on traffic flows through Caldecote and Tiffield

- 9.153. It is noted that concerns have been raised by Tiffield and Caldecote residents that the development would give rise to increase in traffic through the adjacent villages. The results of the modelling in the Transport Assessment has assigned traffic based on wider congestion data and demonstrates that the potential extra traffic using the Tiffield Lane north of the development below after the development is completed would be 35 car movements in the AM peak and 36 in PM peak. This represents one additional traffic movement every 1 to 2 minutes.

- 9.154. The above figures represent the two-way traffic flow on Tiffield Lane north of the site's link road although it is worth noting that these traffic figures reduce in the villages as traffic dissipates to other routes before reaching the village centres. In terms of Caldecote it reduces to 5 vehicle movements through Caldecote, 20 vehicles movements through the north of Tiffield and 8 vehicle movements south from Tiffield along St Johns Road during the morning peak hour. This assessment includes the traffic that would be created along these routes as a result of the construction of the new roundabout and the resulting changes in peoples favoured routes.
- 9.155. Given the modest increases described above, this would have an indiscernible impact on the local road network in and around the adjacent villages. Given the above it is considered that the development would not fundamentally effect safety or the capacity of the associated road network. Furthermore, given the limited traffic created by the development through Tiffield and Caldecote it is not considered that this would have any serious impact on the railway bridge that is located to the west of Tiffield.
- 9.156. The applicants have stated that they are intending to apply for a weight restriction on the section of Tiffield Lane to the south of the new spine road. This is not a matter that can be dealt with under the planning powers of the Council but can be secured by the Local Highway Authority if they consider it to be necessary.
- 9.157. In addition, it is proposed that should further work be required on Tiffield Road to the north of the site which becomes apparent after the development is operational, these works will be designed and secured through a S106 agreement.

The Routing of HGV Traffic.

- 9.158. Given the proximity of the development to the primary road network HGV traffic movements have not been assigned to the local road network as primarily the routing of HGV's is largely reliant on the primary road network where this is possible.
- 9.159. With regard to Northampton Road the proposed mitigation works with the build out will reduce the attractiveness of the route to HGV's. In the case of Tiffield and Caldecote the difficult and narrow country routes would make the routes unattractive to HGV's and therefore would not be likely to see significant increases of these types of traffic movements

Impacts on the traffic flows on the A43

- 9.160. The TA sets out that the impact of the development on the A43 corridor is mainly in the AM peak although concludes that this is modest with any increases in journey times being less than 1 minute during the AM peak after the completion of the development and all other committed development is taken into account.
- 9.161. With regard to the Abthorpe Roundabout the TA shows that upon during the AM peak period the roundabout is already operating at capacity and the development will result in additional traffic through the roundabout resulting an increase of flows of 2%. Highways England have commented that they consider this to be acceptable and it is further considered that this impact is not severe, which is the test for highway impacts as set out in the NPPF.

The impact on the Traffic flows on the A5

9.162. The Transport Assessment looks at the impact of the predicted flows of traffic along the A5 corridor and this demonstrates that the impact as a result of the development is modest and that journey times will only increase by no more than one minute. Any further increase in traffic would be down to wider background traffic growth.

The Impacts on Remote junction capacities

9.163. The TA also looks at the impact of the development on junctions further from the development site, including those set out below, however no severe impacts were identified.

- A5 Weedon Bec signalled junction
- A5 Bugbrooke/Litchfield Crossroads
- A5 Duncote Priority Junction
- A43 Blisworth Junction
- Gayton Road/Towcester Toad junction in Milton Malsor
- A43 Northern and Southern M1 junctions
- A5 Old Stratford Signalised roundabout.

The Proposed Access Arrangement

9.164. The new roundabout and the access road through the site form part of the full application and therefore detailed plans have been submitted. As the roundabout is located on the A43 its design falls under the jurisdiction of Highway England (HE). In their response they recommend that planning permission should not be granted at this time. The response then details a number of relatively minor design changes required for the new roundabout and raised concerns about the proximity of the exit of the layout to the north of the roundabout. In particular they raise concerns that upon exiting the layby there would only be a short distance to the cross both lanes of traffic to turn right into the site. Highways England state that permission for a departure from their normal standards would therefore be required.

9.165. In mitigation for the below standard distance it is understood that given the slower traffic movements as a result of the roundabout and that this section of the road will be lit as a result of the development, it is not considered to be unacceptably detrimental to highway safety and that consent for the departure is likely to be forthcoming.

9.166. It therefore requested that delegated authority be given to the Assistant Director for Planning and Economy to resolve the above issues with Highways England before any planning permission could be issued.

Construction Traffic

9.167. Initial temporary construction access to the site is proposed to be from up to three locations off the Tiffield Lane which will enable access to the eastern and western parcels of the site. Following the construction of the proposed roundabout on the A43 this will then be used as the primary construction access for the development for the remainder of the construction period with secondary access from the Tiffield Road for smaller vehicles. In addition, the spine road will act as the internal haulage route for construction traffic. The routing of vehicles to the site would be controlled through a routing agreement in the construction management plan. Parking for vehicles to ensure they are parked within the site would also be controlled.

- 9.168. It is estimated that during the peak construction period there will be 200 car/van vehicle movements per day and 50 HGV vehicle movement per day. However, there is nothing in the application to suggest that the peak construction flows will only be reached once the new roundabout has been constructed which leaves the possibility of the Tiffield Lane/A43 junction having to accommodate all the proposed traffic for a period. I have raised this as a matter of concern with Highways England as it was not referred to in their consultation response, however at the time of writing the report I have yet to receive a response.
- 9.169. There are solutions to the issue should Highways England consider that there is a potential issue with the traffic flow such as limiting the amount of works that can take place on site until the new roundabout is operational or controlling the hours of the deliveries to the site to non peak times and ensuring all traffic approaches the site from the Abthorpe roundabout or closing the right turn into Tiffield Lane before construction begins.
- 9.170. It is therefore requested that delegated authority be given to the Assistant Director for Planning and Economy to satisfactorily resolve the above issues with Highways England.

The Framework Travel Plan

- 9.171. Policies S10, C1, C2 and C5 of the JCS requires that new development should have good access to public transport and other sustainable means of transport such as cycling and walking. This approach is echoed by policies SS2 and AL3. Policy AL3 requires the local bus service to be diverted to serve the development and new footpaths and cycleways to link the development to Towcester
- 9.172. Paragraph 108 of the NPPF requires that on assessing specific applications for development, it should be ensured that appropriate opportunities to promote sustainable transport modes can be, have been, taken up, given the type of development and its location.
- 9.173. A Framework Travel Plan (FTP) has been provided by the applicants to support their application and set a target of a 10% reduction in single occupancy car driver trips to be achieved over a ten-year period.
- 9.174. It is stated that this will be achieved through the implementation of the following measures:
- The employment of a Travel Plan Co-ordinator to implement the travel plan.
 - The creation of an on-site 3-metre-wide footpath and cycleway
 - The provision of a signalised pedestrian and cycleway crossing at the new roundabout.
 - A new combined 2-metre-wide cycleway and footpath on the eastern side of Northampton Road between the roundabout and Senna Drive to link the site to the town
 - The provision of on-site cycle parking, showers and changing facilities
 - The provision of an on-site bus turning loop.
 - The provision of a car sharing scheme
- 9.175. The 88-bus service runs from Northampton via Milton Malsor to 4 stops in Towcester including the A5 opposite the Brave Old Oak public house, Towcester Health Centre, Wordsworth Close and outside the Saracens Head. The Travel Plan states that the applicants are in discussions with the Local Bus service provider, however it does not contain any commitments relating to public transport.

9.176. The FTP needs to set out what bus services will be provided, how the applicants will fund new bus-related infrastructure required to improve access to their development, and to fund the resources required for the provision of any altered, extended or new bus services required until such a time as the anticipated revenue makes them commercially sustainable. It also needs to set out how residents from Towcester will be able to obtain access to the development either through the 88-bus service or through a private service operated by the applicants. It also needs to address the following points:

- Whether bus services would be willing to enter the site prior to adoption as a public highway.
- The phasing of bus, cycling and walking infrastructure to ensure sustainable travel options are available prior to the occupation of development.
- The role of the local highway authority in respect of monitoring, approval of travel plans and agreeing remedial measures in the event that targets are failing.
- The range of remedial measures that can be called upon for failing travel plans.

9.177. It is therefore requested that delegated authority be given to the Assistant Director for Planning and Economy to resolve the above issues with the applicants. The provisions of the FTP will be secured through the S106 agreement to achieve the 10% modal shift.

The Provision of a Footbridge Over the A43

9.178. A number of objections and representations relating to the application, including from local parish councils stating that the application should include a footbridge over the A43. This would improve the connections of the bridleway SB52 from Tiffield Lane into Old Tiffield Road which in turn leads to the Tesco supermarket and via the A5 to the town centre.

9.179. Policy AL3 of the South Northants Part 2 LP requires the site to provide:

d. provision of new footpaths and cycleways that link to existing networks and safe crossing points on the A43.

9.180. The underlying objective of the policy is to ensure a safe and connected site, linking a resident workforce with employment opportunities that the site will deliver. Adjacent to the AL3 land allocation is the AL1 land allocation which also is required to have footpath improvements to link the site to Towcester

9.181. The form and historical growth of Towcester means that the majority of the residential population already lives to the south of the town and the new development of 3000 new homes at Towcester South will add to this.

9.182. As stated earlier in the report the application proposes to link to the town via a new signalised crossing on the A43 and a new footpath/cycleway along part of the Northampton Road. Due to the ground level differences a dedicated pedestrian access onto the Tiffield Road does not form part of the pedestrian access strategy.

9.183. Options to improve the connectivity via SB52 were examined by the applicants at the pre-application stage. The first option was an improved at grade crossing, however this was discounted due to vehicle speeds on the A43. The second was an overbridge with ramps at the existing crossing point however this would require the use of land not within the control of the applicant or Highways England and therefore the applicants discounted the option.

- 9.184. Policy AL3 does not state that the development has to provide a foot bridge at this location only that there must be new footpaths and cycleway to link the development to the town, which the application does provide via the new A43 roundabout.
- 9.185. Using this route the distance from the centre of the site to Towcester Town Centre is approximately 2.1km, if the footbridge option were to be utilised the distance would be 1.95 km. therefore using this measure the footbridge option is marginally preferable, however not to the extent that the proposed solution becomes objectionable. I can also see that connecting the site to the Tesco on Old Tiffield Road has advantages in that workers could buy lunches other daily supplies, however it is likely that such provision will be provided within the development at Zone A which include potential retail and petrol filling station uses.
- 9.186. Hence, whilst I can see some limited advantages in the footbridge option, but given the limited nature of these advantages and the fact that the applicants do not own the land to deliver the footbridge option it is considered that the proposed solution does meet the policy requirement including those under policy NE3 of the Part 2 LP and that there is no sound reason to refuse the application on these grounds.
- 9.187. Nevertheless, Officers are discussing providing a pedestrian only link to the AL1 Belle Plantation site so the development can take advantage of the connectivity enhancements provided by this development.
- 9.188. The Impacts of the Development on the Noise Environment: Policy SS2 of the Part 2 LP requires developments to result in a good standard of amenity for occupiers in relation to noise impacts.
- 9.189. Paragraph 170 of the NPPF requires that planning decisions should prevent unacceptable risk of being adversely affected by unacceptable levels of noise pollution. Paragraph 180 states that developments must be appropriate for their location and need to mitigate and reduce to a minimum impact resulting from noise from new development.
- 9.190. The applicants have submitted a detailed noise survey to accompany the development and have modelled noise impacts from the development on the most sensitive nearby dwellings, including The Shires, Third Lodge, Brickyard Farm, Williams Barn and dwellings in Caldecote. The Council's Environmental Services Officer has stated that this is a robust assessment and raises no objections to the application subject to safeguarding conditions.
- 9.191. The impacts can be split into the following main categories and these are considered in greater detail below.
- Construction noise from the main site
 - Noise from highway and lighting works
 - Vibration from construction works
 - Noise from construction traffic
 - Noise from the site once it is operational
 - Offsite noise from traffic using the site
 - Noise from plant and equipment

Construction noise from the main site

- 9.192. Without any mitigation works the construction noise is predicted to exceed the recommended criteria at a number of locations when works are close to the site boundary and thereby close to the identified properties. However, these works,

such as site preparation, in these locations will be short in duration in these locations before moving to other parts of the site. The application also sets out mitigation measures which will reduce the noise at these locations and these measures can be secured through the Construction Environmental Management Plan (CEMP). Where the works will be towards the centre of the site the noise impact on the properties will be negligible with the exception if Williams Barn where the noise impacts will be more long lived but with the mitigation works, will be significantly reduced.

Noise from highway and lighting works

- 9.193. The assessment examines the impacts of the works on the A43, including the construction of the new roundabout, on the residential amenity of the nearby sensitive properties. The report sets out the impact considering that the expectation of Highways England will be that some of the works will be undertaken at night, as such a lower threshold noise acceptability was used when looking at Third Lodge, which is the closest property. During the works to the A43 there is predicted to be a short-term temporary impact at Third Lodge which is considered to be minor to moderate.
- 9.194. Impacts on Williams Barn, Brickyard Farm, the dwellings in the Shires nearest to the development the impacts are considered to be temporary short-term adverse effect that is considered to be minor to moderate.
- 9.195. Mitigation works to minimise the impacts will be controlled through the CEMP.

Vibration from construction works

- 9.196. The assessment of vibration from the construction works suggest that there will be impacts from vibratory compaction works and rotary piling works at nearby properties during the construction period. These works are likely to be adverse but temporary and short lived and not considered to be significant.
- 9.197. There will also be impacts on the commercial properties at Williams Barns, located 25 metres from the site boundary. Some of the units include designers and manufacturers of sensor and measurement equipment, however again the impacts will be temporary and short lived. Mitigation works to minimise the impacts will be controlled through the CEMP.

Noise from construction traffic

- 9.198. Two scenarios are considered in the report, the first with all construction traffic entering before the new A43 roundabout is constructed with construction traffic entering via Tiffield Lane, the second considers impacts if the main construction traffic enters the site via the completed new A43 roundabout.
- 9.199. The assessment indicates that the magnitude of change for all roads except Tiffield Lane would be negligible. For the scenario where construction traffic enters the site via Tiffield Lane there would be an increase in road noise and there would be a moderate adverse effect on Brickyard Farm which would be difficult to mitigate given that the traffic is on the public road. However, this impact would be temporary until the A43 access becomes available to use for construction traffic.

Noise from the site once it is operational

- 9.200. The assessment begins by considering a worst case scenario where all noise generating activities are located in all the worst case locations for surrounding

receptors This tends to be close to the site boundaries and this is based on the locations of the buildings shown in the indicative plans assuming a B2/B8 use in zones B,C and D and Zone A developed as either a car show room, petrol filling station and roadside retail unit, or B2/B8 uses. An acoustic fence along the western boundary of Zone C1 and C2 is also included in the modelling.

- 9.201. Without any further mitigation the modelling shows adverse impacts for a number of nearby dwellings. To resolve these matters a series of additional mitigation measures are proposed including;
- Amending the indicative layouts
 - On plot noise barriers
 - Increased sound attention in the fabric of the buildings
 - Restricting certain uses at certain locations within the site.
 - Reducing noise sources behind HGV access doors.

9.202. The assessment sets out decisions on which mitigation measures to use will be decided upon at the reserved matters stage when the design and uses of the buildings are worked up in more detail and that these measures will be secured through appropriate planning conditions.

9.203. With the above mitigation measure implemented the assessment shows that for all sensitive receptors the day and late nighttime periods there would be no adverse impacts. However, for the early night time period there will be some increases in noise levels for Williams Barn Brickyard Farm and some properties in The Shires Estate that lie closest to the site, however these increases are considered to be negligible to minor and are therefore not considered to be unacceptable.

Offsite noise from traffic using the site

9.204. The offsite noise modelling has been carried out in accordance with the relevant guidance and is based on the traffic levels following the completion of the development and including the predicted increase in traffic movement from other developments up to the 2031.

9.205. The assessment shows that there would be a less than 1 decibel increase along all the roads considered with the exception of the A5 south where increases were slightly higher. On Brackley Road slight decreases of noise from traffic are expected. Tiffield Lane will experience an increase of 1.9 decibels during the day

9.206. It is therefore considered that the additional traffic movements to and from the development once it is operational will result in negligible to minor impacts and therefore are considered to be acceptable.

9.207. Objection to the development and suggests that a sound attenuation barrier is needed on the land between the A43 and the Northampton Road north of the new A43 roundabout to protect the residential amenity of Third Lodge. The assessment for operation noise shows that the noise can be attenuated without offsite measures and that for highway noise mitigation measures are not required,

Noise from plant and equipment

9.208. It is recognised within the assessment that the proposed development may include plant and equipment to control the climate within the buildings. However, as the proposals for the buildings are only at the outline stage there are currently no details of what plant and equipment might be provided on the site. Therefore, a condition is suggested which limits the noise from plant and equipment to be no greater than existing noise levels at the sensitive receptors.

- 9.209. It is therefore considered that with the appropriate mitigation measures, which would be controlled through the submission of a Construction and Environmental Management Plan and through a Construction Management Plan, the majority of the noise and vibration impacts can be adequately mitigated. There are some impacts during the construction phase which are difficult to mitigate against, however where these occur, they will be on a temporary basis.
- 9.210. In terms of operational noise additional mitigation works can be provided at the detailed design stage that would address any outstanding noise issues and that is can be controlled through the use of appropriate planning conditions.
- 9.211. From the evidence provided within the Independent Market Assessment the application proposed to deliver 30% of the developable area within the development parcels for B1 or B2 to comply with criterion 3 of policy AL3 of the Local Plan which allocates the site for development. However, at this current time insufficient work has been carried out to ascertain which of the units can accommodate the necessary B2 uses.
- 9.212. Should this application be approved it will be necessary for the Council to understand which of the units can accommodate the B2 uses before it starts to grant reserved matters consent for the buildings on site so it can ensure the necessary mix of uses are delivered. Officers have discussed this matter with the applicants and they understand the need for this issue to be resolved and are willing to work in combination with Officers to ensure an adequate mechanism is provided to control this and it is the view of Officers that this matter can be adequately addressed.
- 9.213. It therefore requested that delegated authority be given to the Assistant Director for Planning and Economy to resolve the above issue with the applicants prior to the determination of the application.

Impact of the Development on Air Quality

- 9.214. Policy S10(k) of the JCS states development will *“minimise pollution from noise, air and run off.”*
- 9.215. Policy BN9 stipulates that: *“proposals for new development which are likely to cause pollution or likely to result in exposure to sources of pollution or risks to safety will need to demonstrate that they provide opportunities to minimise and where possible reduce pollution issues that are a barrier to achieving sustainable development and healthy communities including:*
- a) maintaining and improving air quality, particularly in poor air quality areas, in accordance with national air quality standards and best practice;”*
- 9.216. It goes on to say that *“Development this is likely to cause pollution, either individually or cumulatively, will only be permitted if measures can be implemented to minimise pollution to a level which provides a high standard of protection for health and environmental quality”*.
- 9.217. The pre-amble to Policy BN9 (para 10.64) states *“Air quality, in particular, is a pressing concern for many places within the plan area, but is particularly focused on urban areas where there are heavy flows of traffic. There are presently eight designated Air Quality Management Areas: six within the urban area of Northampton, one along the M1 corridor between Junctions 15 and 15a and another located within Towcester”*.

- 9.218. Policy SS2 of the recently adopted Part 2 Local Plan states that permission will be granted where development *“has appropriate regard to its effect on air quality and the effects of air quality on its future occupiers”*.
- 9.219. Para 181 of the NPPF states *“Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan”*.
- 9.220. The centre of Towcester has long suffered with air quality issues due the A5 trunk road passing right through the middle of the town. This is particularly problematic around the Market Square, where the road is relatively narrow and flanked on either side by continuous rows of relatively tall buildings. This combined with the volume of traffic and the fact the traffic is often slow moving or stationary, leads to a build-up of air pollution from vehicles which is not easily dispersed. The level of harm resulted in an Air Quality Management Area (AQMA) being designated along part of the A5 through Towcester since 2005.
- 9.221. The Air Quality Assessment Modelling in the ES from the potential traffic data has shown that the modelling assessment is predicting annual mean NO₂ concentrations below the annual mean objective of 40 µg/m³ at most of the selected receptors during the 2017 base year. However, concentrations are predicted to exceed the objective limit at Crown House, Watling Street, Towcester, located at the junction of Brackley Road and the A5, and 78 Watling Street, located within the AQMA.
- 9.222. The modelling assessment predicts a decline in NO₂ concentrations at all monitoring locations when using the future year emissions data. This is due to a predicted decline in emissions as a result of improvements in fuel technology within the vehicle fleet.
- 9.223. There is also a significant decline in concentrations predicted along the A5 and Northampton Road due to a reduction in vehicle numbers on these road links in the future year 2025 as a result of the Towcester Southern Bypass being built and open.
- 9.224. The Council’s Environmental Protection Officers notes that the relief road is not yet built, nor is there agreement as to road traffic orders or status of the current Watling Street in the future. There is at present no guarantee the relief road will remove a significant proportion of traffic (especially HGVs) from Towcester town centre if the official trunk road continues to follow the A5.
- 9.225. They have concerns, therefore, for air quality within the town centre should this development go ahead either:
- without the relief road or,
 - with the relief road but with no de-trunking of the existing A5 (i.e. diverting it onto the relief road) and no road traffic orders in place which will prevent or at least discourage traffic from continuing to travel through the town centre (NB. weight restrictions, etc. cannot be placed on a trunk road).

- 9.226. Colleagues consider that the current assessment does not assess the predicted impact of the development should the Towcester relief road not be completed before the development is built.
- 9.227. The report in the ES acknowledges that *“Without the southern bypass in place NO2 concentrations are unlikely to reduce to such an extent within the Towcester AQMA. Although it is not possible to predict the impact of the operational development under this situation, it is anticipated that without the southern bypass in place the overall adverse impact of the Proposed Scheme may be greater.”*
- 9.228. The applicant has subsequently responded to clarify that there would be 685 additional vehicle movements (over and above the figure quoted in the ES) through the Towcester AQMA in the future year if the relief road is not provided (i.e. a worst-case scenario). NO2 levels, however, would still be expected to reduce overall within the AQMA due to gradual improvements in vehicle emissions more than outweighing the harm caused by the additional traffic. Essentially, they conclude that the impacts would be the same as identified in the ES (i.e. ‘moderate adverse’) even in the worst-case scenario. The ES is, therefore, judged to be robust.
- 9.229. Environmental Protection have been reconsulted for their comments on the applicant’s addendum submission. Whilst they remain concerned that there will be elevated levels of Nitrogen dioxide within Towcester where residential properties remain affected, these levels are already above the objective limits and the proposed development will have no significant negative impact on them (i.e. will not make them materially worse). Environmental Protection, therefore, do not object to the proposal. They suggest the best way forward for improving air quality in central Towcester is to use the results to encourage NCC and Highways England to come to an agreed solution for Towcester Watling Street and work up an air quality mitigation plan.
- 9.230. In light of the above, the impacts on air quality are considered to be moderately adverse in the short term and the future opening of the relief road and reductions in vehicle emissions are expected to result in an improvement to air quality in the medium to long term, more than off-setting any harm caused by traffic increases generated by the proposal. Some of these external factors could even start to be having a positive mitigating effect before the proposed development is fully constructed and occupied (the relief road, for example, could be open in roughly 2 years). As a result, the proposal is considered to comply with JCS policies S10(k) and BN9 and Part 2LP policy SS2.

The Impacts of the Development on Light Pollution

- 9.231. Policy SS2 of the Part 2 LP requires that developments incorporate sensitive lighting schemes that respects the surrounding area and reduce harmful impacts on wildlife and neighbours. Planning Practice Guidance states that artificial lighting needs to be considered when a development may increase levels of lighting or would be sensitive to prevailing levels of artificial lighting. The South Northamptonshire Design Guide requires that development do not have a lighting scheme that exceeds that which is required.
- 9.232. The applicants have submitted an External Lighting Strategy which needs to cover two aspects of the development, firstly the lighting scheme for which full planning permission is sought, i.e. the new road and roundabout infrastructure, and secondly to set out a framework for how the commercial properties will be lit. There is also a chapter relating to lighting in the Environmental Statement. The Council

has employed the services of Designs for Lighting consultancy to review the submitted documents and their comments are summarised earlier in the report.

- 9.233. The report itself concentrates on the on the aspects of the development that are applied for in full and in particular the spine road running through the development. There are no details on how the A43 will be lit as part of the development proposals in the application, however this can be covered through an appropriate planning condition which can be used to minimise light spill towards residential properties and the night landscape. Unfortunately, the report does not include a framework that relates to the lighting of the outline component. The lighting strategy broadly outlines some key principles that the detailed lighting scheme should comply with, in terms of the Environmental Zone and general lighting standards.
- 9.234. It would be expected for the lighting strategy to provide a detailed set of technical parameters to inform the detailed design. Such parameters should include; maximum correlated colour temperature of light sources (with consideration towards sensitive ecology and relevant guidance), luminaire installation geometry (to reduce the potential for light spill and glare) and to detail a suitable control strategy such that the appearance of the lit effect is reduced by dimming luminaires in accordance with the site usage. This is not an exhaustive list, but such items would assist the lighting assessment outcomes.
- 9.235. The Council's lighting consultant has raised some concerns over omissions from the lighting strategy and helpfully has suggested further areas that should be covered. However, it should be borne in mind that the application is in outline form for the development parcels only and some aspects of the lighting will need to be resolved once the layout becomes clearer.
- 9.236. Officers therefore need to carry out further work with the Council's lighting consultant to ascertain which aspects of the concerns need to be addressed at the outline stage to provide a robust framework and a robust set of commitments and parameters for the applicants at work within at the reserved matters stage.
- 9.237. Officers are therefore seeking delegated powers to address these matters prior to the determination of the application with the applicants and are confident that these matters can be addressed.

The Sustainability of the Buildings:

- 9.238. Policy S10 of the JCS requires that development meets the highest standard of sustainable design and maximises the generation of its own energy from decentralised and renewable or low carbon sources. Policy S11 of the JCS requires that non-residential development over 500 sq. metres need to achieve the BREEAM very good standard. Policy INF4 of the Part 2 LP requires 10% of parking spaces to have DC fast charging equipment or equivalent, Policy SS2 requires development to adhere to a range of development principles including sustainable design measures around transport, flood risk water efficiency and ecology.
- 9.239. The application includes a Sustainability Statement, the purpose of which is to agree a framework for sustainability measure for the outline application going forwards. The approach is to adopt a fabric first approach to energy, for new industrial building and logistic warehousing the main spaces of the buildings are not usually heated and therefore the main energy usages come from the office spaces, the main energy uses within these areas come from heating and lighting. The statement proposes the following measures:

- Achieving the BREEAM very good standard.
- The use of sustainable materials
- Design of an energy efficient thermal systems
- Reducing carbon use during construction
- Reducing the energy consumption of the buildings
- Provision of roof lights to cover 15% of the unit roof spaces.
- Improved air tightness
- Appropriate glazing.
- Use of LED lighting and auto dimming where appropriate.
- The use of air source heat pumps
- The possibility of using photovoltaic panels on the site.
- The possibility of using battery storage system on the site to store electricity from the solar panels or the network.

9.240. It is considered by the report that the development will achieve a 30% reduction in operational regulated carbon emissions over the standard required by building regulations.

9.241. With regard to electricity charging points the statement proposes two charging points per building with sufficient ducting to allow 10% of the parking spaces to have EV charging points at an unspecified future date. The statement also includes proposed measures for transport, water materials, waste, land use and ecology pollution and climate change mitigation.

9.242. The Council have employed the services of Greengauge energy consultancy to look at the proposed submission and their response largely states that there is insufficient information as this stage on the energy strategy for the site.

9.243. With regard to energy generation and photovoltaic cells and it does not give the expected undertaking that any significant energy generation would take place upon the site and to any limitation that there might be on its delivery nor meet the Council's standards relating to car charging points.

9.244. The Council's Sustainability consultant has examined the proposals against the planning policy background and has concluded that further information is required, however officers are aware that there are in effect two levels of Sustainability Statement that need to be provided. The first will need to set out a framework at the outline stage and the second more detailed proposal at the reserved matters stage. Officers need to explore with the consultant and the applicants which information needs to be provided at this stage to set a robust framework to ensure that the policy requirement at are met and in particular the need to maximise on site energy generation, which with these types of building normally means photovoltaic panels.

9.245. Officers are aware that until the buildings are designed in detail in some of the sustainability measure will be worked up in detail and it is at this point that further information will be required from the applicants. The applicants have agreed to a process of exploring these issues with officers in more detail and offices are confident that these matters can be resolved.

9.246. Officers therefore seek delegated powers from the committee to progress these matters to an acceptable resolution prior any planning permission be granted.

The Impact of the Development on Residential Amenity

- 9.247. Policy SS2 of the Part 2 LP requires development to provide a good standard of amenity.
- 9.248. The nearest residential properties to the development are Brickyard Farmhouse located approx. 130 metres to the west of the site and Williams barn located approx. 50 metres to the North of the site. Approximately 200 metres to the north east of the location of the new A43 roundabout is Third Lodge, whilst to the south of the site, separated from the development by the A43 is The Shires housing estate, and these dwellings are typically 90 metres from the applications site.
- 9.249. The main issues relating to residential amenity are noise, transport, lighting and air quality and these are covered in the respective areas of the report.

The Impact of the Development on Archaeology:

- 9.250. The legislative requirements and policy framework relating to the protection of below ground heritage assets are largely as set out in the section above relating to above ground heritage assets.
- 9.251. Policy HE2 of the Part 2 LP specifically relates to archaeology and sets out a hierarchy of archaeological assets and the circumstances where development will be allowed for each category of archaeological remains.
- 9.252. A desk-based assessment has been undertaken of land within the site, drawing on available records and documentary sources for the site and surrounding area. Archaeological field evaluation, comprising geophysical survey and trial trench evaluation have also been commissioned and undertaken as part of this Archaeological Assessment, in full consultation with Northamptonshire County Council's Archaeological Advisor.
- 9.253. The archaeological assessment has confirmed that the site does not contain any designated heritage assets such as World Heritage Sites, scheduled monuments or registered battlefields; where there would be a presumption in favour of their physical preservation in situ and against development.
- 9.254. From the assessment archaeological remains have been identified mostly within the northern and western parts of the application site. Two enclosures were identified in the northern part of the site and confirmed by geophysical survey and trial trenching to be the remains of late iron age and Roman settlement. Part of a further enclosure was identified by geophysical survey in the western part of the site and confirmed by trial trenching to be iron age. All of the enclosures appear to extend outside the Site. A further small Iron Age enclosure was identified to the south of these.
- 9.255. The site boundary of the site is defined by the route of Tiffield Lane and the coming of the railways in the latter half of the 19th century, with the route of the A43 largely following the route of a former railway. The site of 'Towcester Works', a short-lived 19th century ironworks, also lies within the site on the east side of Tiffield Lane. No structural remains relating to the ironworks were identified by the field evaluation and this appears to have been completely destroyed.
- 9.256. The smaller, western, portion of the site contains small areas of surviving ridge and furrow earthworks, although the archaeological assessment concludes these do not obviously relate to any focus of medieval activity.

- 9.257. The NCC archeologically advisor agrees with the assessment carried out and advise that the methodology is appropriate and that the remains are not of such significance that preservation is required in situ. However, the remains will need to be properly recorded through a proper investigation of the remains and recommends a condition requiring a written scheme of investigation and for the works to be carried out in accordance with that scheme.
- 9.258. The archaeological assets are of local importance rather than of national importance however, and whilst they can be recoded at least some of these non-designated heritage assets, will be lost to further generations. This loss needs to be balanced against the benefits the development will bring and this will be discussed later in the report.

The Impact of the Development on Ecology and Biodiversity:

- 9.259. Paragraph 170 of the NPPF states that Planning policies and decisions should contribute to and enhance the natural and local environment by (amongst others): a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and d) minimising impacts on and providing net gains for biodiversity.
- 9.260. Paragraph 175 states that planning authorities should refuse planning permission if significant harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for and should support development whose primary objective is to conserve or enhance biodiversity. Opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 9.261. Paragraph 180 of the NPPF states that planning decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should (amongst others) limit the impact of light pollution from artificial light on nature conservation.
- 9.262. National Planning Practice Guidance (PPG) states that Local Planning Authorities should only require ecological surveys where clearly justified, for example if there is a reasonable likelihood of a protected species being present and affected by development. Assessments should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity.
- 9.263. Policy NE3 of the Part 2 LP seeks to conserve and wherever possible enhance green infrastructure. Policy NE4 seeks to protect and integrate existing trees and hedgerows wherever possible and requires new planting schemes to use native or similar species and varieties to maximise benefits to the local landscape and wildlife. Policy NE5 requires that proposals aim to conserve and enhance biodiversity and geodiversity in order to provide measurable net gains. Development proposals will not be permitted where they would result in significant harm to biodiversity or geodiversity, including protected species and sites of international, national and local significance, ancient woodland, and species and habitats of principal importance identified in the United Kingdom Post-2010 Biodiversity Framework.
- 9.264. Policy BN2 of the JCS 2014 states that development that will maintain and enhance existing designations and assets or deliver a net gain in biodiversity will be supported. Development that has the potential to harm sites of ecological importance will be subject to an ecological assessment and required to

demonstrate: 1) the methods used to conserve biodiversity in its design and construction and operation 2) how habitat conservation, enhancement and creation can be achieved through linking habitats 3) how designated sites, protected species and priority habitats will be safeguarded. In cases where it can be shown that there is no reasonable alternative to development that is likely to prejudice the integrity of an existing wildlife site or protected habitat appropriate mitigation measures including compensation will be expected in proportion to the asset that will be lost. Where mitigation or compensation cannot be agreed with the relevant authority development will not be permitted.

9.265. The Conservation of Habitats and Species Regulations 2017 provide for the designation and protection of 'European sites' and 'European protected species' (EPS). Under the Regulations, competent authorities such as the Council have a general duty to have regard to the EC Habitats Directive and Wild Birds Directive.

9.266. In terms of EPS, the Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in the Regulations, or pick, collect, cut, uproot, destroy, or trade in the plants listed therein. However, these actions can be made lawful through the granting of licenses by the appropriate authorities by meeting the requirements of 3 strict legal derogation tests:

- a. *Is the development needed to preserve public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment?*
- b. *That there is no satisfactory alternative.*
- c. *That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.*

9.267. Natural England's Standing Advice states that an LPA only needs to ask an applicant to carry out a survey if it's likely that protected species are present on or near the proposed site. The Standing Advice sets out habitats that may have the potential for protected species, and in this regard the site contains a stream and there are a number of mature trees and hedgerows within and adjacent the site, and therefore has the potential to be suitable habitat for a variety of species including EPS; such as bats, breeding birds, badgers, reptiles, great crested newts, water voles and invertebrates.

9.268. No statutory designated sites are located within the site boundary or the zone of influence, therefore there will be no impact from the proposals on statutory designated sites. One potential non-statutory designated site is located within the red line, potential Local Wildlife Site (No. 490) this has been assessed as not meeting Local Wildlife Site criteria for designation.

9.269. Habitats identified on site largely compose of arable farmland, with areas of ephemeral / short perennial, improved grassland, poor semi-improved grassland, scattered trees, scrub and semi-improved neutral grassland with hedgerows and a small watercourse. The site is surrounded by a similar makeup of habitats but also includes a number of ponds.

9.270. The site does however have some nature conservation value containing a mosaic of habitats of structural diversity which form part of a valuable green connective corridor along the old railway line. The majority of the habitat will be retained, a small proportion of the dense scrub and semi-improved grassland will be lost to

accommodate the development, mainly the access route to the western limits of the proposal.

- 9.271. The hedgerows have been assessed as being the habitat of greatest ecological importance on site. The majority of the hedgerows and trees on the boundary of the development will be retained as part of the proposals any loss will be compensated through the proposed landscaping scheme, with species rich native hedgerows being detailed to be planted and enhancement of the retained hedgerows.
- 9.272. There is a narrow watercourse that runs through the southwest corner of the site this is identified as being of low ecological value. During the surveys no evidence of riparian mammals was found along the watercourse and it was considered unsuitable habitat for Water Vole, Otter and Crayfish.
- 9.273. Aside from the habitats mentioned above to be retained the proposal will result in the loss of the majority of habitats on site mainly composed of arable farmland which is considered to be well represented locally and have low species diversity.
- 9.274. In order to manage the potential impacts arising from the construction activities these are proposed to be controlled through the production and implementation of a Construction Environmental Management Plan (CEMP). The submission and approval of a CEMP will be the subject of a planning condition should this application be approved.
- 9.275. In line with NPPF the development seeks to achieve net gain in biodiversity by balancing this loss of habitat with the enhancement of retained habitats, creation of new habitats and off-site options for habitat enhancement/creation. Paragraph 9.77 indicates a number of measures that would provide enhancements and habitat creation to assist in achieve a net gain in biodiversity, these include;
- Enhancement of existing retained hedgerows
 - New native tree and shrub planting.
 - Creation of species-rich grassland
 - Creation of swales and attenuation features
- 9.276. In order to offset the loss of biodiversity on site, off site locations for habitat enhancements in the local area have been explored. These include the Towcester Watermeadows located to the east of the Council Offices and the River Tove Greenspace which is located on either side of the footpath link between Northampton Road and Old Tiffield Road both of which are in the ownership of the District Council. Enhancement works proposed include grassland and scrubland enhancement, pond creation, enhancement of water habitats, hedgerow planting, habitat enhancements and tree planting. These works would be delivered via a legal agreement with the applicants and would also include a payment for the monitoring and maintenance of works for a period of 30 years.
- 9.277. With regard to protected species, no evidence of badger setts was found on or immediately adjacent to the site, however evidence of foraging and commuting of badgers was found across the site. Appropriate mitigation measures are included within the submitted documents, these will be contained and refined as required within the proposed CEMP.
- 9.278. Several trees within the site had confirmed bat roosts present within the 2016 and/or 2019 survey and one tree has a high potential for bats due to the presence of a number of features suitable for roosting. All of the trees are proposed to be retained in the current proposals so there is not thought to be a significant impact

posed by the proposals. The survey also showed that the site is not valuable bat foraging habitat.

- 9.279. Several species of declining farmland birds were recorded from site including linnet, skylark, yellowhammer and yellow wagtail. Single territories were recorded for each species. The loss of habitat available on site for these species will result in their displacement likely to another suitable habitat locally. This is not thought to be a significant effect
- 9.280. Reptile surveys were carried out identifying a small population of common lizard to be present with a peak population count of one individual found associated with the southwest corner of the main part of the site. This habitat is due to be directly impacted due to the modification of the watercourse and the installation of water attenuation features at this location. Outline mitigation measures are given for reptiles, these will be fully detailed in a Reptile Method Statement submitted with the CEMP, this will ensure the impact on the local reptile population is minimised.
- 9.281. Great Crested Newt (GCN) surveys were undertaken in 2016 and updated in 2019 these surveys found Great Crested Newts to be present within the two ponds to the south west of Zone D and the two ponds to the north east of Zone A, all ponds sit outside the application boundary but 3 ponds sit adjacent to the application boundary. No ponds will be lost to the development the surrounding terrestrial habitat that links it to the wider landscape which provide opportunities for foraging, refuge and dispersal, e.g. hedgerows and disused railway will be retained. The majority of the habitat to be lost i.e. arable farmland is unlikely to be utilised by GCN apart from potentially dispersal. Outline mitigation measures are given for GCN, these will be fully detailed in a GCN Method Statement submitted with the CEMP.
- 9.282. In order to discharge its legal duty under the Conservation of Habitats and Species Regulations 2017 the LPA must firstly assess whether an offence under the Regulations is likely to be committed. If so, the LPA should then consider whether Natural England would be likely to grant a licence for the development. In so doing the authority has to consider itself whether the development meets the 3 derogation tests listed above.
- 9.283. In respect of planning applications and the Council discharging of its legal duties, case law has shown that if it is clear/ very likely that Natural England will not grant a licence then the Council should refuse planning permission; if it is likely or unclear whether Natural England will grant the licence then the Council may grant planning permission.
- 9.284. Officers are satisfied, on the basis of the advice from the Council's Ecologist and the absence of any objection from Natural England, and subject to conditions, that the welfare of any EPS found to be present at the site and surrounding land will continue and be safeguarded notwithstanding the proposed development and that the Council's statutory obligations in relation to protected species and habitats under the Conservation of Habitats & Species Regulations 2017, have been met and discharged.

The Impacts of the Development on Drainage and Flooding:

- 9.285. Policy BN7A of the JCS requires development to have adequate wastewater treatment provision and sustainable drainage system, Policy BN7 of the JCS requires developments to follow best practice and demonstrate that the development will not increase flood risk and all measure must be adequately managed. Policy SS2 of the Part 2 LP requires development to adequately

address any flood risk arising from the proposals. Paragraph 163 of the NPPF states *“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment”*

- 9.286. The site lies entirely within flood zone 1, that is land that has a less than 1 in 1000 annual probability of river or sea flooding, however a full flood risk assessment is required due to the site being greater than 1 hectare.
- 9.287. The site is in agricultural use and there is no existing man-made drainage within the site. From the topographical survey levels on site generally fall towards the section of open watercourse running adjacent to Tiffield Lane. The survey carried out by the applicants confirms the open watercourse is the way the site currently drains.
- 9.288. The development will result in a significant amount of hard surface and buildings and will need a drainage system to carry the water away. Without further measures the site would drain far more quickly than it would as an agricultural field which could then result in flooding problems within the local water courses. In line with advice from the Environment Agency the site is not seen as being suitable to have infiltration methods to dispose of the surface water.
- 9.289. Hence the development proposes to have on site storage measures to enable the flow of surface water from the site to be no greater than would be the case if the site remained in an agricultural land use, these are split into two systems.

System 1

- 9.290. The surface water drainage system shall convey surface runoff from the private access road, on plot car parking areas and service yards to a detention basin located adjacent to the watercourse which crosses the site. Runoff from these areas is considered to be the most susceptible to pollutants and as such will receive treatment via a number of sources prior to it discharging to the watercourse.

System 2

- 9.291. This surface water drainage system conveys surface water runoff from the commercial building roofs and the surface water inflow from offsite flows. The roof runoff from the commercial buildings is considered to be less susceptible to pollutants than the runoff entering System 1. Surface water runoff from these areas will be stored on plot and will then discharged to a piped gravity surface water drainage system within the private access road which will discharge directly to the open watercourse crossing the site.
- 9.292. For foul water flows for the site there are two current options the first is pumping the foul water flows from the site to a new connection near the new A43 roundabout. The second and preferred option is to connect to the existing sewer network in Tyrrell Way by drilling a new connection under the A43.
- 9.293. The consultation response received the Environment Agency has not made any adverse comment regarding to the drainage strategy. Anglian Water have responded to state that there is capacity in the system for the foul water flows from the development and that they will advise on the most appropriate point of connection at a later date.

- 9.294. The Lead Local Flood Authority have responded and states that the impacts of surface water drainage have been adequately addressed at this stage and has not raised any objection to the development. However, has required the imposition of certain conditions to ensure the further details are submitted and that the development comes forwards in accordance with the submitted Flood Risk Assessment.
- 9.295. On the basis of the response received it is considered that the risk of flood has been identified and adequately mitigated against and therefore the development is acceptable in this regard.

The Impacts of the Development on Public Rights of Way

- 9.296. Policy C1, C2 and C5 of the JCS promotes the use of walking over the use cars. Policy SS2 of the Part 2 LP requires development to have a safe and suitable means of access for all people including pedestrians. Policy AL3, which allocates the site for development states that the development shall include new footpaths and cycleways that link to existing networks and safe crossing points on the A43.
- 9.297. Paragraph 108 of the NPPF states that development proposals need to take appropriate opportunities to promote sustainable transport modes.
- 9.298. At present the Bridleway SB32 crosses through The Shires estate through the open space within the development before heading through the planted bund on the edge of the A43 on a somewhat overgrown route. In order to continue on the route, it is then necessary to cross all four carriageways of the A43 via a small break in the barriers in the central reservation, before then climbing a steep (circa 5m high) embankment and into the site.
- 9.299. Usage of the Bridleway was surveyed by the applicant for 3 days over a weekend for 24 hours per day and during this period it was found that no one used this section of the Bridleway. Whilst this is just a snapshot in time, the survey and overgrown nature of the right of way demonstrates that the Bridleway is little used, and it is considered that this in part due to the difficult and unsafe crossing point on the A43. Given the gradient and nature of the terrain, the application proposes the stopping up/extinguishment of Bridleway SB32 through the site between Tiffield Lane and the A43.
- 9.300. Footpath SB1, which enters the western parcel of the site, will be partially realigned but continue to connect to Tiffield Lane and is proposed to be diverted at the outset of construction in order to protect members of the public from construction activities and allow for continued use of the footpath and there will be no material change in the journey time for users of this PRoW.
- 9.301. The proposal has been designed to accommodate new footpaths and cycleways, including dedicated internal pedestrian and cycleways proposed alongside the internal spine road. These footpaths and cycleways link with an improved footway along Northampton Road, via a safe pedestrian crossing point over the new A43 roundabout, providing enhanced connectivity links with Towcester town centre and neighbouring residential areas. The alteration of the two existing PRoWs which route through the site, will be pursued through separate stopping up and diversion applications.
- 9.302. In terms of legislation regarding the present route, section 137 (1) of the Highways Act 1980 makes it an offence for a person, without lawful authority, to wilfully obstruct the free passage along a highway (including a public right of way). The making of a Temporary Traffic Regulation Order under the Road Traffic Regulation

Act 1984 to effect a temporary diversion of a public right of way when there is no realistic prospect of it being returned to its original route, is not an appropriate measure.

- 9.303. There are possibly two options available to the applicant, the existing Bridleway could be diverted so as to run from a point opposite to the proposed new eastern termination of public footpath SB1 and thereafter to run parallel to and on the south side of the new spinal road as far as the A43 and to terminate at a Pegasus crossing (suitable for horse riders) south west of the new roundabout. The second option is to extinguish the Bridleway; this is the option the applicant wishes to pursue. Whichever the option, a separate s257 of the Town and Country Planning Act application will need to be made to the Local Planning Authority.
- 9.304. The Planning Authority would use its powers under s257(1)(1A) to make an order to stop up or divert a public footpath, bridleway or restricted byway if they are satisfied that:
- (a) an application for planning permission in respect of a development has been made under Part III, and
 - (b) if the application were granted it would be *necessary* to authorise the stopping up or diversion in order to enable the development to be carried out.
- 9.305. It is acknowledged that Policy AL3 of the Part 2 LP requires PRowWs, that are affected by the development of the site, to be addressed. Therefore should Members consider the development acceptable and resolve to approve the application, the applicant will pursue separate s257 application(s) with the Council and those application will run their own course. Consequently the impact on PRowWs is noted and accords with the development plan policies.

The Impact of the Development on Agricultural Land

- 9.306. Policy R2 of the JCS supports development proposals which protects the best and most versatile agricultural land and this is echoed by policy SS2 of the Part 2 LP Plan. Paragraph 170 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by protecting soils in a manner commensurate with their statutory status or identified quality in the development plan.
- 9.307. A survey of the agricultural quality of the land within the site has taken place and this shows the following:
- Moderate quality subgrade 3b – 72% of the site
 - Subgrade 3a – 16% of the site
 - Non-agricultural land – 12% of the site.
- 9.308. (Grade 1 is excellent agricultural Land and 5 is poor. Grades 1, 2 and 3a are defined as Best and Most Versatile agricultural Land).
- 9.309. Given the low amount of Best and Most Versatile agricultural land that will be lost this is not considered to be significant and is an inevitable consequence of the site being allocated for development in the Part 2 LP. However, it does involve the potential loss of some important soils and this needs to be considered against the benefits of the development which will be considered later in the report.

The Arboricultural Impacts of the Development

- 9.310. Policy NE4 of the Part 2 LP states proposals for development should seek to integrate existing trees, woodland and hedgerow. Paragraph 170 of the NPPF states that decisions should recognise the benefits of trees and woodland.
- 9.311. The site is largely used for agricultural use and therefore devoid of trees, predominantly the wooded areas of the site are the field boundaries and the line for the former railway that runs adjacent to Tiffield Lane where a number of excellent mature and semi mature trees are located. No trees within the field boundaries or the former railway line are the subject of a tree preservation order nor is any of the site designated as an ancient woodland.
- 9.312. Tree cover across the site is primarily deciduous, being dominated by common ash, english oak, sycamore, field maple and lime. The recorded life phase of the surveyed trees ranges from young or recently established trees up to those in over maturity and, as may be expected, they are of varying health and structural condition.
- 9.313. The northern boundary of the site is defined by hedgerow and planted an area to the south of Williams Barn. Extending further east, the northern boundary of the site is defined by the old dismantled railway cutting.
- 9.314. The boundary along the A43 where there is continuous hedge along this boundary and trees are planted on the highway side, often on a sloping embankment. These are of varying form with some being of poor form, but others have considerable longevity
- 9.315. The proposed development will result in the removal of some trees and hedgerows as follows:
- The trees on the north west boundary of the A43 to create the new roundabout.
 - A group of trees on the south east side of the A43 adjacent to the Hulcote turn to create the new roundabout
 - The trees located within the railway cutting on site
 - The removal of individual trees and part of a group of trees to allow access through the former railway line adjacent to Tiffield Road.
- 9.316. During the construction phase the existing trees and hedges will be protected by robust metal mesh “heras” type fencing which will be staked into the ground to prevent them from being removed. They will be placed around the root protection zones of the trees and hedges to be preserved on site. The alignment of these fences is shown as part of the arboricultural assessment.
- 9.317. In terms of mitigation, the proposed landscaping plan proposes the planting of a large number of trees which will outnumber the quantity of trees that will be lost from the site as a result of this development.
- 9.318. The Council’s Arboricultural Officer has been consulted on the development and raises no objection subject to the landscaping works mitigating the loss of the trees, which is considered to be achieved.

The Impact of the Development on Health:

- 9.319. Policy SS2 of the Part 2 LP requires that developments of more than 1000sqm have a Rapid Health Assessment.
- 9.320. Health impact assessment enables the identification and assessment of the likely effects that a proposed development will have on the health and wellbeing of the

community. This assessment can be used to maximise the positive health and wellbeing impacts and avoid or minimise any negative health and wellbeing impacts and the applicants have submitted the assessment as part of their application.

- 9.321. The impact assessment is submitted in the correct format and covers physical activity, diet and obesity, green infrastructure, transport and travel, street and public spaces, social interaction, healthcare infrastructure, community safety, health inequalities and hazards to health.
- 9.322. The assessment sets out the nature of the impact, the scale of the impact, duration and actions taken to maximise positives from the development and minimise negatives.
- 9.323. Public Health has been consulted on the health impact assessment and raised no objection however comment that the jobs should be targeted towards local communities and with regard to air quality additional carbon offset and capture measures should be considered.
- 9.324. It is considered that the provision of enhance pedestrian links and the provision of a bus service from Towcester into the site will assist with the local community being able to easily access the site and take jobs in the development. With regard to carbon capture the Council is looking to use species within the landscaping scheme that have a high carbon capture properties.
- 9.325. It is therefore considered that the health impact assessment of the development has been adequately addressed. The air quality impacts of the development within Towcester are assessed separately in this report.

Land contamination

- 9.326. Policy BN9 of the JCS seeks to ensure that any land contamination does not pose a risk to health and the environment.
- 9.327. The applicants have submitted a preliminary site investigation as part of their application for the development. The fieldwork involved boreholes, trial pits and gas and groundwater monitoring wells. The objectives of the investigation were to allow assessment of the underlying ground conditions at the site with respect to geotechnical and contaminated land issues relevant to the proposed development
- 9.328. The results of the chemical testing on soils was used an initial screen to determine if more detailed assessment is required. None of the results exceeded their relevant screening criteria. As a result, the report states that the risk to human health is considered to be low and the site is considered as not being contaminated. Based on the low concentrations of determinants that were recorded within the soils and waters the risk to controlled waters is also considered by the report to be low.
- 9.329. The Council has consulted its Environmental Protection Team on the proposal and the preliminary site investigation. They have responded that Zone D of the application site is located near an historic landfill use the wastes deposited at the site are a source of methane, carbon dioxide with a “moderate” possibility of gassing. The gas monitoring exercise that was carried out in the applicant’s report was not seen as being adequate. Therefore, further work needs to be carried out to quantify any gasses that might be escaping from the landfill see and any measures to ensure any gases do not impact upon the new development and its occupants. However, this can be covered through an appropriately worded

planning condition. It is not considered that any further investigations into land contamination are required.

9.330. It is therefore considered that the application is acceptable regarding land contamination.

The Socio-Economic Impacts of the Development

9.331. Policy S1 of the JCS states that the development needs of Towcester and Brackley will be provided for, Policy S7 of the JCS states that provision will be made for a minimum increase of 28,500 new jobs to 2029. Policy E2 of the JCS states that the scale of office development in smaller settlements will be commensurate with their function. Policy IMP1 of the Part 2 LP states that major commercial development will be required to contribute to increasing and maintaining a skilled workforce. Policy AL3 allocated the development for commercial development.

9.332. Paragraph 80 of the NPPF states that *Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.*

9.333. Paragraph 82 states Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

9.334. The Towcester Masterplan identifies that one of the challenges facing Towcester is the limited number of employment sites within the town which lead to high levels of out-commuting (para 2.18).

9.335. The application includes an economic impact assessment by an independent firm of economists which sets out the economic benefits the development will bring to the local and wider economies. The Council's economic development team have been consulted upon the report and they have confirmed that it is a robust report and it predicts are considered to be an accurate reflection of the benefits that will be derived from the development.

9.336. The assessment sets out the current situation in the local economy, the standout points of which are:

- Between 2011 and 2018 the population of Towcester has increased by 8% which exceeds the rate of growth for the whole country of the same period of 5%. However, the increase in population of people of working age only increased by 1%
- In 2019 total employment in South Northamptonshire was 43,600 compared to 48,400 in 2014, a reduction of 9.9% whilst in the it increased in the South East midlands of 7.4% and nationally by 6.6%.
- Productivity in (measured in Gross Values Added) in South Northamptonshire was £41,517 in 2018 compared with £47,876 in the East Midlands and £58,889 nationally.
- The number of enterprises operating within South Northamptonshire in 2019 was 5470 which is an increase of 1.3% since 2013, compared with 28% for

the south east midlands and 20% for Great Britain, however business survival rates exceeded the regional and national average.

- Of the employed residents of South Northamptonshire only 28% worked within the district.
- South Northamptonshire has a very low unemployment rate with 0.8% of the working age population unemployed.

9.337. The Economic Impact Assessment then proceeds to assess the economic benefits and impacts of the development and these are summarised below.

Construction Phase

9.338. The development will result in approximately £100 million in construction expenditure and result in 76 Full Time Equivalent (FTE) jobs (this will be supported by a skills programme to maximise the usage of the local workforce).

Operational Phase

9.339. It is estimated that the development could support 1464 FTE jobs, of these it is estimated that of these 538 could be created in Towcester and 686 across the wider South Northamptonshire area.

Net additional Gross Added Value

9.340. At the sub regional level, it is estimated that the development results in an additional value to the economy of more than £60 million per annum and £169 million net present value over 5 years.

9.341. In terms of business rates, it is estimated that the proposed scheme could generate business rates of revenue of £2.8 million per annum. Given current retention rates of 50% then would result in additional revenue of £1.4 per annum for the local authority.

9.342. Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. Section 70(4) of the 1990 Act (as amended) defines a local finance consideration as a grant or other financial assistance that has been, that will or that could be provided to a relevant authority by a Minister of the Crown (such as business rate receipts), or sums that a relevant authority has received, or will or could receive, in payment of the Community Infrastructure Levy.

9.343. In this particular instance, the above increase in business rates is not considered to be material to the decision as they would not make the development acceptable in planning terms. It would not be appropriate to make a decision based on the potential for the development to raise money for a local authority and hence the above information is therefore provided on an information basis only

9.344. It is therefore clear that the development will bring very real and very significant socio-economic benefits both locally and regionally to the economy. The level of economic growth in this location is supported by the Development Plan and the NPPF and will help to attract more people of working age to live within Towcester and South Northamptonshire where in recent years the area has been falling behind in both regional and national comparisons.

9.345. Measures will be taken either through the S106 agreement or through planning conditions to secure a Local Labour Strategy, which will ensure that the developer

makes reasonable provision to ensure jobs are actively promoted to the local workforce and encourage the developer use local contractors where possible.

The Local Fund

9.346. The applicants have informed the Local Planning Authority that, whilst not forming part of the planning application, they intend to set up a local community fund that would be administered by a third party, in this case the Northamptonshire Community Foundation. There are limited details on the fund and how much money will be put into it however, similar funds set up by IM Properties give provided grants of between £2500 and £5000 to community projects. The grant applications will be considered by a panel which could include local representatives.

9.347. The applicants have asked local residents what they consider are most appropriate projects to support through their community engagement and answers include, but not exclusively funding for:

- Food banks
- Tree planting
- Schools
- Multi faith prayer areas
- Apprenticeships
- Sports facilities,
- Play parks
- Youth facilities
- Better parking in Towcester

9.348. For the purposes of determining the planning application it is considered that as the fund is not required to make the development acceptable, the necessary funding to support local infrastructure which is required to mitigate the impacts of the development is set out in the report and will be secured through a S106 legal agreement. Hence this fund sits outside of the planning process and it is considered that this fund is not a material consideration in the determination of the planning application and no weight should be attached to it, the details of the fund are included within the report for information purposes only.

HUMAN RIGHTS AND EQUALITIES

9.349. Due regard has been taken to South Northamptonshire Council's equality duty as contained within the Equalities Act 2010.

9.350. There may be implications under Article 8 and Article 1 of the First Protocol of the Human Rights Act 1998 regarding the right of respect for a person's private and family life and home, and to the peaceful enjoyment of possessions. However, these potential issues are in this case amply covered by consideration of the environmental impact of the application under the policies of the development plan and other relevant policy guidance.

10. COMMUNITY INFRASTRUCTURE LEVY

10.1 The CIL is a set charge that must be paid if planning permission is granted for a new house (or houses) or for a home extension or retail development of over 100 sqm. The CIL helps to fund a range of infrastructure that is needed as a result of new development (e.g. road schemes, schools and community facilities). Reliefs and exemptions are available.

- 10.2 This development, if approved, is liable to pay the Community Infrastructure Levy for the retail element of the development as set out in the South Northamptonshire Council Charging Schedule. As the amount of retail floorspaces is not known, although capped at 1000sq metres, it is not possible to know what the CIL charge will be.
- 10.3 For further information relating to CIL please visit: <http://www.southnorthants.gov.uk/7143.htm>).

11. PLANNING BALANCE AND CONCLUSION

- 11.1. The NPPF at paragraph 10 states 'At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking...for decision taking this means:
- approving development proposals that accord with the development plan without delay; and
 - where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted
- 11.2. In the context of this application, the development site is allocated within the Part 2 LP for employment use under Policy AL3.
- 11.3. In the context of this application, a view has to be taken as to whether or not there are any adverse impacts that would significantly and demonstrably outweigh the benefits of granting consent when assessed against the policies in the Framework taken as a whole.
- 11.4. Paragraph 8 of the Framework states that there are three overarching objectives which are interdependent and need to be pursued to achieve sustainable development.
- 11.5. **An economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- 11.6. **A social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- 11.7. **An environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy
- 11.8. As set out in the recommendation at the beginning of the report and as discussed further in section 9 of the report there are a number of matters which are still outstanding and are delegated to the Assistant Director for Planning and Economy

to be resolved. By and large these are issues raised by external technical consultees and require the submission of further information in order to be resolved. Officers are confident in the ability to resolve these issues and do not consider that they create any impediment to determining the application at this time. In assessing the planning balance for determining the application it is therefore assumed that these issues have been resolved. If for whatever reason these matters cannot be resolved, then the application will be returned to the Planning Committee for determination.

- 11.9. In terms of the economic role the development will deliver up to 100,000 sqm of B1, B2 and B8 industrial units with a further 2400 sqm metres of ancillary uses. The development is likely to generate up to approximately 1500 new full-time jobs of which approximately 700 of which would be taken within the district. The construction of the development would result in expenditure of approximately £100m some of which would further feed into the local economy and create 76 full time jobs during construction. It is also estimated that the development would add £60m per annum to the sub regional economy. It is anticipated that there will be a wide range of jobs created by the development; such as Managers, Information Technologists, engineering and production staff, administrative and sales staff, customer services, operatives and transport drivers. The development will bring real economic benefits both locally and regionally. The level of economic growth in this location is supported by the Development Plan and other Council adopted Strategies, as well as the NPPF.
- 11.10. In relation to the social role, as noted above, the development of this site will deliver a wide range of employment opportunities and subject to conditions relating to local labour strategies and training opportunities, a proportion of these are likely to be taken up by local people. As noted above, it is also proposed to improve cycle connectivity locally and to encourage access to public transport links to and from the site.
- 11.11. The development will involve the diversion of one footpath and possible closure (if diversion is not feasible) of one bridleway that is little used by the public. A new route through the site allows access to users of the existing PRowS, and although longer will be safer. It will also allow residents and employees, as pedestrians and cyclists of the development to use a safe crossing into Towcester.
- 11.12. The proposal will have an impact on the local community by way of noise, dust and vibration. During the construction phase mitigation measures are proposed but cannot mitigate against noise and vibration in all circumstances. Where impacts cannot be mitigated, they will be temporary and short term in nature. For the operational phase the Environmental Statement demonstrates that unacceptable adverse impacts can be mitigated. For any short-term construction related noise and vibration it is considered that the economic and social benefits of the development will outweigh the limited harm created.
- 11.13. Similarly, impacts on the highway network have been assessed and a suitable mitigation strategy has been proposed, including a S106 contribution towards further mitigation measures on the Northampton Road. The s106 agreement also includes a mechanism for further works to be carried out if necessary.
- 11.14. The Transport Assessment does identify that the extra traffic on the highway network will result in extra time needed to negotiate some junctions however these delays are not considered to be significant and will be offset by the economic and social benefits of the development.
- 11.15. The development includes the construction of a new roundabout on the A43/Northampton Road Roundabout which will remove a dangerous junction

where there have been a number of serious road traffic accidents which will bring significant benefits. Furthermore, the development removes the right turn option into Tiffield Lane across the A43 which is also considered to be a dangerous junction.

- 11.16 In relation to the environmental role, the proposal would lead to the loss of ecology and biodiversity on the site, however this will be mitigated against by both on site and off-site enhancement works.
- 11.17 Officers accept that the proposal will result in significant changes to landscape character, views and visual amenity. The largest and most significant impacts being on Tiffield Lane, Brickyard Farm, Williams Barns, the footpaths to the north of the site and from the A43 in the immediate vicinity of the site, rather than longer distance views. There are also visual impacts, to a lesser degree, from The Shires estate.
- 11.18 However, officers consider that some of these impacts are an inevitable consequence of the site being allocated for this type of development and the topography of the site which results in the terraces formed being significantly above existing land levels. Subsequent reserved matters applications will include detailed building elevations and a materials palette and the use of colour banding, as set out in the revised Design and Access statement, to mitigate the visual impact. Careful consideration will be paid to the building form and roof shapes in order to achieve the best possible design for this location and obtaining high quality landscaping scheme. It is considered the residual harm will be offset by the economic and social benefits of the development.
- 11.19 Officers also accept that the proposal would result in some harm to the setting of designated heritage assets. However, due to the mitigation measures incorporated into the proposed development, it is considered that on balance, the proposal will lead to less than substantial harm to the heritage significance of these assets and this harm would be outweighed by the economic and social benefits of the development. No harm to built non designated heritage assets was identified.
- 11.20 There are no designated archaeological assets on the site, however the proposals would result in the loss of some non-designated archaeological heritage assets. Nevertheless, this would be mitigated by the excavation and recording of the assets and the resulting increase in knowledge of the archaeological interest of the site. Therefore, given that the assets are only of local, not national, interest it is considered that the harm would be outweighed by the economic and social benefits of the development.
- 11.21 The development will result in additional traffic movements along the A5 through the centre on Towcester which is an Air Quality Management Area. It is unlikely that the development will create any operational traffic within the next (approximately) 2 years due to the time taken to build out the first phase of the development. However, nitrogen dioxide levels would still be expected to reduce overall within the AQMA in the longer term due to gradual improvements in vehicle emissions more than outweighing the harm caused by the additional traffic. The impacts on air quality are considered to be moderately adverse in the short term and the future opening of the relief road is expected to result in an improvement to air quality in the medium to longer term. Any short-term harm is considered to be outweighed by the economic and social benefits of the development.
- 11.22 Developments of the nature proposed can operate 24 hours a day and 7 days a week and as such need to be illuminated. Whilst measures can be incorporated to minimise this, the health and safety of the workers needs to be factored into any planning decision on lighting schemes. As such it is considered that the lighting of the development cannot be completely mitigated against and that some levels of light pollution and therefore harm, are inevitable in the night landscape. However, it is considered that any harm is outweighed by the economic and social benefits of

the development

- 11.23 In addition, the new roundabout and its approaches on the A43 need to be lit for highway safety reasons. Whilst the light spill from these works can be minimised through detailed design work, they need to achieve the aims of lighting the road and therefore some light pollution will be the inevitable consequence of allocating the site for development. However, it is considered that, once mitigation measures and light minimisation measures are incorporated the residual harm will be offset by the economic and social benefits of the development.
- 11.24 The development includes a Sustainable Drainage System, consisting of balancing ponds and underground storage tanks to ensure that the existing Greenfield runoff rate is achieved which the Environment Agency and Lead Local Flood Authority are satisfied with, subject to conditions.
- 11.25 The impact of the development on the loss of the agricultural land in terms of a national resource has been assessed as moderate adverse. National and Local Policy, which seeks to direct development to poorer quality land, must be viewed in the context of the site's allocation within the Local Plan. The scale and nature of employment land subject to the allocation has been through the Local Plan process, where no alternative land was found to be suitable or available to fulfil the employment role of the application site. Furthermore, any harm will be offset by the economic and social benefits of the development.
- 11.26 In the context of the presumption in favour of sustainable development set out within the NPPF, it is considered that the proposal would result in sustainable development and for these reasons, the application is recommended for approval, subject to the caveats and conditions set out in the recommendation.

12. RECOMMENDATION

TO DELEGATE TO THE ASSISTANT DIRECTOR FOR PLANNING AND ECONOMY TO GRANT PERMISSION, SUBJECT TO THE FOLLOWING MATTERS BEING SUBMITTED AND CONSIDERED ACCEPTABLE

- **The submission of a revised Sustainability Statement to address the outstanding matters**
- **The submission of a revised landscaping scheme to address the outstanding matters.**
- **The submission of a revised Lighting Statement to address the outstanding matters.**
- **The submission of a revised Framework Travel Plan to address the outstanding matters.**
- **An addendum to the Transport Assessment to model HGV movements associated with the proposed 70% use of the site area for B8 use.**
- **The submission of additional plans and information to resolve Highway England's outstanding issues with the design of the roundabout and the proximity of the layby and any further representations they may make in relation to construction traffic.**
- **Further clarity regarding how 30% of the developable site area will be brought forward for B2 usage.**

AND THE COMPLETION OF A PLANNING OBLIGATION UNDER SECTION 106 OF THE TOWN AND COUNTRY PLANNING ACT 1990, AS SUBSTITUTED BY THE PLANNING AND COMPENSATION ACT 1991, TO SECURE THE ITEMS SET OUT BELOW AND TO DELEGATE TO THE ASSISTANT DIRECTOR FOR PLANNING AND ECONOMY TO AMEND, ADD AND DELETE THE HEADS OF TERMS AND PLANNING CONDITIONS AS REQUIRED AND THE FINAL DRAFTING OF THE PLANNING

CONDITIONS;

HEADS OF TERMS.

- 1) **Implementation of the Framework Travel Plan and detailed Travel Plan.**
- 2) **Enhanced Bus Service Plan and Financial Contribution to support it if necessary.**
- 3) **£1000 per annum for the funding of the Travel Plan for five years or for the time period of the build out, whichever is longer.**
- 4) **Provision of a scheme for the of site biodiversity off setting and implementation.**
- 5) **Payment for the management of the off site biodiversity offsetting scheme.**
- 6) **The safeguarding of the land for a new access to the football pitches.**
- 7) **The reservation of Zone D to deliver smaller units for the local economy unless not needed by the market.**
- 8) **The delivery of the off site highway mitigation works on Northampton Road.**
- 9) **The delivery of the additional traffic calming works for Northampton Road should they be required.**
- 10) **The delivery of the additional traffic mitigation works for Tiffield and Caldecote should they be required.**
- 11) **The provision of supporting skills payment (unless a Local Labour Strategy is agreed).**
- 12) **The payment of a S106 monitoring fee.**

CONDITIONS

Given the current outstanding issues above it is currently not possible to provide detailed wording for the proposed conditions hence as set out above this is delegated to the assistant Director for Planning and Economy. However, the list below identifies the currently matters that the conditions will need to address.

General

- 1) Time limit for the permissions.
- 2) Setting out of the approved plans.

Construction

- 3) Submission of a Construction Method Statement.
- 4) Restriction of hours of working during construction.
- 5) Submission of a Construction and Environmental Management Plan.
- 6) Requirement for trees to be protected during construction.
- 7) Phasing of the construction of the new roundabout and new access road and construction of the plateaus and buildings and closing of the right turn into Tiffield Lane from the A43.
- 8) Restriction of hours for HGV's to deliver to the site during construction.

Highway works

- 9) Delivery of off-site highway works (footpath/cycleway on Northampton Road)
- 10) Requirement for spine road to be offered for adoption to the LHA.
- 11) Full details of all exposed retaining structures and fences to be used in the

construction of the new cycleway/footpath on Northampton Road.

Use of the site

- 12) The uses on site shall be in accordance with the submitted application.
- 13) Control of the use of the site to ensure 30% of the site is for B1/B2 uses only.
- 14) No more than 2400 sqm of independent stand-alone office space shall be provided on the site.
- 15) Total retail space not to exceed 1000sqm.
- 16) Prevention of use of retail/restaurant uses on site until part of the business uses are operational.
- 17) Reserved matters applications need to include full details of any proposed mezzanine floors.
- 18) Restriction total mezzanine floor space to 30,000sqm.
- 19) Removal of Permitted Development rights for extensions to the buildings.
- 20) Requirement for all reserved matters applications for B2 use to include proposed hours of operation.
- 21) Requirement for any reserved matters application for Zone A to include full details of hours of operation.
- 22) Securing provision for refrigerated trailers to have their own power supply.
- 23) Restriction of the use of the building within the new use class E.
- 24) Removal of Permitted Development rights for conversion of stand-alone office uses to be converted to residential use.
- 25) Restriction on external storage of goods.

Lighting

- 26) Compliance with the lighting scheme for the new spine road.
- 27) Further details of lighting on the A43.
- 28) Full details of the lighting scheme to be submitted with the reserved matters applications.

Drainage

- 29) implementation of the sustainable drainage strategy.
- 30) Details of the foul pumping station.
- 31) Drainage conditions as required by the Lead Local Flood Authority.

Landscaping

- 32) Landscaping to be implemented.
- 33) Landscaping maintenance and retention.
- 34) Provision of a Landscaping and Ecological Management Plan.

Noise

- 35) Further noise attenuation measure to be submitted with the reserved matters application.
- 36) Control of external plant and equipment.
- 37) Noise safeguarding conditions as recommended by the Environmental Health Officer.

Sustainability

- 38) All reserved matters application to include full details of the proposed energy generation measures.
- 39) Requirement for buildings to achieve the BREEAM “very good” standard.
- 40) Requirement for ten percent of parking spaces to have car charging facilities.

Environment

- 41) The provision of a soil management plan.
- 42) The provision of waste management plan.
- 43) Process for the finding of unexpected land contamination on site.
- 44) Requirement for further details relating to the understanding and mitigation of gas from the nearby historic landfill.
- 45) Further condition(s) to protect ecology and biodiversity as required by the Ecology Officer.

Miscellaneous

- 46) The securing the programme of archaeological works.
- 47) The submission of a Local Training and Employment Strategy.
- 48) The requirement for the provision of fire hydrants within the site.
- 49) Requirement for crime prevention measure and CCTV to be submitted with the reserved matters applications.
- 50) The requirement for reserved matters applications need to include an Environmental Colour Assessment.
- 51) The requirement for further details of all crib/retaining wall use on the site.
- 52) Securing footpath link to Belle plantation which needs to be provided at park of reserved matters for Zone D.
- 53) The requirement that retained footpaths need to be kept clear and available for use.