

Case Officer **Graham Wyatt****16/02119/FUL**

Date received	Date valid	Overall Expiry	Ward	Parish
26 October 2016	2 November 2016	1 February 2017	Raunds Windmill	Raunds

Applicant **Roxhill Warth 2 Ltd And Henry H Bletsoe And Son LLP**Agent **Oxalis Planning - Mr S Harley**Location **Land End Of Scalley Way Raunds Northamptonshire**Proposal **Development of two distribution buildings containing B8 warehousing space with ancillary office, B1 office and research and development space (B1c) together with vehicular access from Warth Park Way and London Road , earthworks and landscaping including the creation of drainage features with green infrastructure and landscaping provision including along Meadow Lane**

This application is reported to the Planning Management Committee because it falls outside the Scheme of Delegation in Part 3.2 of the Council's Constitution (2015).

1.0 Summary of recommendation

1.1 That Members resolve to GRANT conditional planning permission subject to the completion of a S106 Agreement in respect of developer contributions and external works.

2.0 The proposal

2.1 The proposed development site extends to approximately 29.8ha and the proposal seeks to erect two new employment buildings marked as unit 6a and 6b. The buildings would be primarily storage or distribution (B8) buildings with ancillary office accommodation, but will also contain office space (B1), and research and development accommodation (B1b).

2.2 The two buildings will provide a combined total of 93,341 sq. m of floorspace with associated car parking and service yards. The buildings represent an extension to Warth Park and are known as Phase 3 (with phases 1 and 2 already completed). The buildings would be occupied by Howdens (kitchen suppliers) with unit 6a providing 64, 681 sq. m of floorspace and unit 6b providing 28, 660 sq. m of floorspace.

2.3 Vehicular access from Warth Park Way and London Road will be provided via a site access road passing beneath Meadow Lane in the form of an underpass, with Meadow Lane retained at existing level and alignment. The application also proposes improvements to Meadow Lane (Bridleway, or byway open to all traffic) which would provide a broad, extended landscaped corridor (60m wide) and significant new landscaping and tree planting along the existing route.

2.4 The development also proposes earthworks and landscaping within the development site including the creation of drainage features and an additional 13.5ha of country park. There are no trees on the site that are protected by a tree preservation order. The site is not within or adjacent to a conservation area and there are no listed buildings that would be materially affected by the proposals. The site lies mainly within Flood Zone 1.

3.0 Site and Surroundings

- 3.1 Warth Park is located to the north west of Raunds and adjoins the A45 and B663 London Road. The application site forms part of the area directly to the south of Meadow Lane. Roxhill Developments have been responsible for the development at Phase 2 of Warth Park in Raunds since 2010, and the scheme is now recognised as an important employment site of sub-regional importance within North Northamptonshire. Facilities have now been developed for DPD, Dr. Martens AirWair, and DSV. A 61,065 m² B8 distribution facility for Howdens Joinery was completed in June 2016. These developments have created approximately 750 jobs. Construction of a new supermarket for ASDA has also commenced on the mixed use Gateway Development at the entrance to the scheme adjacent to London Road and is due for completion in spring 2017.
- 3.2 Alongside this development, Roxhill have constructed a 13.8ha country park which is fully accessible to the residents of Raunds and the wider local community. This Country Park includes 1.6km of footpaths, 4 sustainable drainage lakes and 31,962 new trees, hedges and shrubs have been planted.
- 3.3 The proposed development site covers an area of approximately 29.8ha with most boundaries being easily defined. To the North, the site boundary is largely defined by the established Meadow Lane which travels from London Road in the east down to Stanwick Lakes in the west beyond the A45 underpass. To the east the site is bounded by an existing hedgerow and landscaped bund, whilst to the south and west the boundary is defined by the existing Hogs Dyke water course and A45 beyond. The Upper Nene Valley Gravel Pits Site of Special Scientific Interest (SSSI) and the Special Protection Area (SPA) is situated some 200m to the north east of the site on the opposite side of the A45.

4.0 Policy Considerations

- 4.1 National Planning Policy Framework
National Planning Practice Guidance
- 4.2 East Northamptonshire Local Plan 1996
Saved Policy GEN3 - Planning Obligations
- 4.3 North Northamptonshire Joint Core Strategy
Policy 1 Presumption in favour of Sustainable Development
Policy 2 Historic Environment
Policy 3 Landscape Character
Policy 4 Biodiversity and Geodiversity
Policy 5 Water Environment, Resources and Flood Risk Management
Policy 8 North Northamptonshire Place Shaping Principles
Policy 9 Sustainable Buildings and Allowable Solutions
Policy 10 Provision of Infrastructure
Policy 16 Connecting the Network of Settlements
Policy 17 North Northamptonshire's Strategic Connections
Policy 18 HGV Parking
Policy 19 The Delivery of Green Infrastructure
Policy 20 Nene and Ise Valleys
Policy 22 Delivering Economic Prosperity
Policy 23 Distribution of New Jobs
Policy 24 Logistics
Policy 25 Rural Economic Development and Diversification
Policy 26 Renewable Energy
- 4.4 Supplementary Planning Guidance
Planning out crime; Parking; Sustainable Design; Biodiversity and Developer

5.0 Relevant Planning History

- 5.1 11/00700/OUT: Outline: Demolition of existing buildings, development of employment park including A3/4/5, B1b and c, B8, C1, D1 and D2 uses together with access, parking areas and open space (all matters reserved except for access) Approved 22.03.2012 – Phase 1
- 5.2 12/00522/VAR: Variation of Conditions 1 and 2: EN11/0700/OUT (22.03.12)-Condition 1 (dealing with Reserved Matters) and Condition 2 (Dealing with REM time limit): Demolition of existing buildings and development of employment park Approved 08.05.2012;
- 5.3 12/01528/FUL: Development of distribution unit including associated access, parking, servicing and landscape, together with access highway works and associated landscaping Approved 29.11.2012
- 5.4 13/00801/VAR: Variation of condition 2 to allow for additional office floorspace on 12/01528/FUL Development of distribution unit including associated access, parking, servicing and landscape, together with access highway works and associated landscaping dated 12/11/2012 Approved 03.07.2013
- 5.5 13/01243/REM: Reserved matters: Appearance, landscaping, layout and scale for a B8 unit of 11,985 square metres with associated parking pursuant to outline planning permission 11/00700/OUT dated 22.03.12 as varied by 12/00522/VAR dated 08.05.12 Approved 26.09.2013
- 5.6 14/00789/REM: Reserved matters: Appearance, layout, scale and landscaping for a B8 (storage and distribution) unit of 38,399 square metres and associated parking works pursuant to planning permission EN/11/00700/OUT - 'Outline: Demolition of existing buildings, development of employment park including A3/4/5, B1b and c, B8, C1, D1 and D2 uses together with access, parking areas and open space (all matters reserved except for access)' dated 09.12.11 Approved 14.08.2014
- 5.7 14/00881/VAR: Variation of condition 12 - travel plans pursuant to planning permission 11/00700/OUT Outline: Demolition of existing buildings, development of employment park including A3/4/5, B1b and c, B8, C1, D1 and D2 uses together with access, parking areas and open space (all matters reserved except for access) Approved 14.08.2014
- 5.8 15/00422/REM: Reserved matters - layout of car parks for disabled and for additional Geopost staff parking pursuant to planning permission 11/00700/OUT dated 9.12.11 - Outline: Demolition of existing buildings, development of employment park including A3/4/5, B1b and c, B8, C1, D1 and D2 uses together with access, parking areas and open space (all matters reserved except for access) 02.07.2015
- 5.9 15/01051/VAR: Variation of condition 13 - to increase floorspace limits - pursuant to planning permission 11/00700/OUT Outline: Demolition of existing buildings, development of employment park including A3/4/5, B1b and c, B8, C1, D1 and D2 uses together with access, parking areas and open space (all matters reserved except for access) Approved 13.08.2015
- 5.10 15/01220/VAR: Reserved matters - Appearance, layout, scale and landscaping for a B8 unit of 60880 sq. metres pursuant to planning permission 11/00700/OUT dated 9.12.11 - Outline: Demolition of existing buildings, development of employment park including A3/4/5, B1b and c, B8, C1, D1 and D2 uses together with access, parking areas and open space (all matters reserved except for access) Approved 13.08.2015
- 5.11 16/01119/REM: Construction of accessible parking spaces for visitors to the open

space area pursuant to planning permission 15/01051/VAR dated 13.8.15 Variation of condition 13 - to increase floorspace limits - pursuant to planning permission 11/00700/OUT Outline: Demolition of existing buildings, development of employment park including A3/4/5, B1b and c, B8, C1, D1 and D2 uses together with access, parking areas and open space (all matters reserved except for access) Approved 11.08.2016

6.0 Consultations and Representations - Full text of comments are contained at Appendix A.

6.1 Responses from residents and neighbours. 95 objections were received from local residents. A petition with 567 signatures was also received. The material planning considerations raised are as follows:

- The impact on the character and appearance of the area;
- The site is designated as a protected open space in the Raunds Neighbourhood Plan;
- The site is close to Stanwick Lakes which is designated as a Special Protection Area and a Site of Special Scientific Interest;
- Light pollution to surrounding area;
- Noise impact on the surrounding area;
- Impact upon air quality;
- Impact on drainage and flooding;
- The impact on Meadow Lane and surrounding public footpaths;
- Lack of employment opportunities;
- The development is contrary to the emerging Stanwick and Raunds Neighbourhood Plan;
- Contrary to the adopted Joint Core Strategy and the National Planning Policy Framework;

6.2 Raunds Town Council: Object for the following reasons:

- Contrary to the Neighbourhood Plan;
- Impact on Nene Valley NIA;
- Pollution from Emissions;
- Light Pollution;
- Noise Pollution;
- Hydrology and Flood Risk;
- Site Levels and Landform; and
- Impact on Surrounding Landscape.

6.3 Commission for Dark Skies: 1) Set Planning Conditions on all exterior lighting schemes for both units 6A and 6B to ensure that there is no upward waste light from any lighting source and that there is minimal illumination of the building's cladding from any light source in perpetuity. 2) Refuse permission for the use of any white cladding on any aspect of units 6A and 6B.

6.4 ENC Environmental Protection:
Air Quality - No objection.
Construction Management Plan - No objection subject to a condition
Contaminated Land - No objection.
Noise - No objection subject to conditions.

6.5 National Planning Casework Unit: No comments to make.

6.6 Natural England: No objection.

6.7 Police Liaison Officer: No formal objection.

- 6.8 The Ramblers Association: Concerned at the inconvenience that will be caused to the users of Meadow Lane whilst the new 'green bridge' is constructed. The Temporary Diversion route should follow the shortest route possible.
- 6.9 The Environment Agency: No objection subject to conditions.
- 6.10 Northampton County Council Archaeologist: No objection subject to conditions.
- 6.11 Local Lead Flood Authority: No objection.
- 6.12 ENC Planning Policy: No objection to the development.

7.0 Evaluation

7.1 The proposal

7.2 The development proposes two B8 warehouse buildings with ancillary B1 office space. The two buildings will provide a combined total of 93,341 sq. m of floorspace with associated car parking and service yards and represent an extension to Warth Park and is known as Phase 3 (with phases 1 and 2 already completed). The buildings will be occupied by Howdens (kitchen suppliers) with unit 6a providing 64, 681 sq. m of floorspace and unit 6b providing 28, 660 sq. m of floorspace.

7.3 The proposed buildings would be similar in appearance to the unit to the north approved under application 15/01220/VAR which Howdens currently occupy. The Design and Access Statement (DAS) submitted in support of the application states that,

"The underlying principle of the proposed design is to provide a building that offers architectural character, while adding quality and aesthetic enhancement to the immediate vicinity. The proposed unit represents a high quality industrial building that integrates well with the surrounding context.

The building is designed to provide a positive aspect when viewed from the adjacent vantage points with the design of the office components used to punctuate the main entrance to the building and provide an attractive and varied elevation frontage to Meadow Lane. The use of varying cladding colours which are arranged in 5 horizontal bands of various grey tones (dark at the bottom to light at the top) together with the proposed profiles, metallic coatings along and full height glazing raise the aesthetic quality and serve to break down the overall uniformity of the warehouse design whilst offering excellent longevity and durability."

7.4 The buildings will be constructed from a portal steel frame construction with a parapet roof edge. Both vertical and horizontal cladding in various shades of metallic grey are proposed. The dimensions of the buildings is as follows:

	Unit 6A	Unit 6B
Height to ridge	18.360m	18.160m
Height to eaves (haunch)	15.000m	15.000m
Width	230.165m	151.205m
Length	312.700m	216.140m

7.5 The external colouring of the building will be graduated with lighter colours on the higher elements of the building to assist in reducing the apparent height, by fading the building into the skyline. Horizontal glazing to the offices also helps to break down the external massing of the buildings. The external dock doors and personnel doors are all coordinated to match the colour of the surrounding cladding panels, unifying the scheme, while the red accent colour to the flashings on the main office, segregates

warehouse and office environments as well as creating an accent feature.

- 7.6 Perimeter fencing will be 2.4m high paladin security fencing. The fencing will have a plastic coated finish. External lighting will be provided with building mounted units and lighting columns, within the car and lorry parking areas, in order to provide a safe and secure working environment for the staff. However, all light fittings used will be specified to point downwards and will incorporate deflection shields, to prevent light spillage upwards and minimise light pollution. This matter is considered further later in this report.
- 7.7 The proposed buildings are lower than the existing Plot 5 Howdens building with a ridge height of +67.310m AOD on Plot 6a compared to +81.450m AOD on Plot 5 (14.14m difference). This is as a result of the natural topography of the site and the proposed ground remodelling.
- 7.8 Parking for 600 cars is provided through the use of a grade level car park which includes 32 accessible parking spaces positioned within close proximity of the office entrances. In addition a single storey deck is provided to Unit 6a to provide a further 147 car parking spaces taking the total cumulative across the site to 747 spaces. 1.8m wide paths leading pedestrians from the car park to the ancillary office are also provided with access into the site sufficient for both disabled and able-bodied pedestrians.
- 7.9 HGVs entering the site will be checked in via a dedicated gatehouse. Vehicles will then move into the site for docking areas. Additional parking is provided to ensure that should all docks be utilised there is sufficient parking for the vehicles within the site while they wait.
- 7.10 To the north and south of unit 6a a service yard area will be created to allow sufficient circulation for HGV parking and loading. 62 x loading dock levellers in addition to 13 x level access doors are provided and the service yard is set out with a depth sufficient to accommodate the full turning circle of a HGV within the parking and circulation zones while allowing vehicles to carry on loading at the adjacent docks. Unit 6b incorporates a 50m deep service yard to the western elevation comprising 26 x loading dock levellers and 4 x level access doors.
- 7.11 The Design and Access Statement details the following landscaping improvements:
- The rural nature of Meadow Lane will be protected by creating a fully landscaped corridor increasing it from 15m wide to a minimum of 60m wide. Meadow Lane will be planted with mature landscaping across its full width.
 - Meadow Lane will be resurfaced and include a cycle path picnic areas and wooden benches.
 - Access to this next phase will be along an extended estate road passing under Meadow Lane. This will incorporate a 15m wide 'green bridge'/underpass which will ensure the level and alignment of Meadow Lane remains unchanged.
 - The proposed green bridge/underpass is to be completed before any construction work takes place. The landowner will enter a legally binding agreement with East Northamptonshire Council to ensure this is undertaken.
 - An additional Country Park of 33.4 acres is to be created. This will be an expansion of the existing Country Park and provide for a total of 67 acres, equivalent to the size of approximately 45 football pitches.
 - An additional 2.2km of footpaths, 4 sustainable lakes and 31,126 new trees, hedges and shrubs will be planted to further improve bio diversity.
 - The landowner will provide a long term commitment to Raunds Town Council to manage and maintain these public areas.
 - Improvements to the A45 underpass to address localised flooding issues to ensure connectivity to Stanwick Lakes all year round. A bridge over the Hogs Dyke to provide connectivity to the Amos Lawrence Playing Field.

- 7.12 The proposed units will be accessed via a new estate road extension that will go under the proposed Meadow Lane "green bridge". The entrance to the site will be designed to accommodate vehicle queuing, particularly at the main entrance barriers control point which will help to manage and contain the flow of traffic both into the site and back out onto the roads. A separate dedicated car park entrance will eliminate a conflict between goods vehicles and car traffic. The car park areas will be constructed in dense bitumen tarmac and block paving which will form part of a coordinated hard landscaping strategy. Pedestrian access via the new estate road is also provided. Car parking is provided at the current standards appropriate for the proposed use.
- 7.13 The existing site has a substantial difference in levels across its length and width, with an approximate fall in level of some 22 metres from the highest point in the north east corner (+58.90m AOD) down towards the south western boundary point (+36.01m AOD). The proposed ground re-modelling, required to form the new building plateau, has been assessed by specialist Civil Engineers, utilising a 'cut and fill' design analysis which will generate a proposed floor level.
- 7.14 **Policy Position**
- 7.15 The development plan for the area comprises the National Planning Policy Framework (NPPF) and the adopted North Northamptonshire Joint Core Strategy 2011 - 2031 (JCS).
- 7.16 The NPPF defines overarching national policy in two regards:
- Ensuring that sustainable economic development is delivered (Core planning principles and paragraph 17); and
 - The preparation/application of development plan policies, in practice (i.e. the Local Plan and/or Neighbourhood Plans).
- 7.17 Paragraphs 18 - 22 of the NPPF (Building a strong, competitive economy) places a firm emphasis upon securing sustainable economic growth. Paragraph 19 reiterates that planning should encourage sustainable growth and that "significant weight should be placed on the need to support economic growth through the planning system."
- 7.18 In this respect, it must be highlighted that the NPPF strongly incorporates a general requirement for planning to support economic growth. The proposal is anticipated to deliver approximately 600 jobs and this must be regarded as a means to deliver significant growth at Raunds, with wider potential economic benefits for the District as a whole.
- 7.19 The NPPF stresses at paragraphs 17 and 196 that decision making must be plan-led. The NPPF also highlights the importance of both the Local Plan and Neighbourhood Plans as integral elements of the planning system. In this case, the recently adopted JCS seeks to provide at Outcome 5 that "for the workplaces, skills and sites to help build a more diverse, dynamic and self-reliant economy; one which is not overly dependent on in or out commuting". Policy 1 of the JCS also requires a positive approach to be taken to considering development proposals, reflecting the NPPF presumption in favour of sustainable development.
- 7.20 Policies 22 (Delivering Economic Prosperity) and 23 (Distribution of New Jobs) of the JCS reflect the NPPF's emphasis on economic development, seeking to deliver a net increase of 31,100 jobs within North Northamptonshire (Policy 22), of which 7,200 should be delivered within East Northamptonshire (Policy 23/Table 3). The application proposals could significantly contribute towards meeting these strategic job requirements.
- 7.21 The adopted JCS is the principal development plan document covering Raunds. Although a small number of policies from the 1996 District Local Plan remain in force, none of these is relevant to determination of the current application.

- 7.22 The spatial development strategy for Raunds is defined by JCS Policy 11(1)(b). This states that: "The Market Towns will provide a strong service role for their local communities and surrounding rural areas with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town". Policy 1 links the JCS and NPPF paragraph 14 presumption in favour of sustainable development.
- 7.23 The proposal would deliver significant growth in jobs in addition to the Warth Park Phase 2 developments that have already taken place during the Plan period to date (since 2011). Questions could be raised as to whether the scale of the proposed development would be appropriate to the character of Raunds, although in practice the development would form a further development phase for the strategic Warth Park employment area, which already constitutes a large scale employment site.
- 7.24 By contrast to the adopted JCS, the emerging Raunds Neighbourhood Plan (RNP) seeks to protect the application site through designation of this land as "protected open space". Alongside this, the RNP Vision seeks to deliver "good employment opportunities" (Aim and Objectives RNP, p17). Moreover, Objective 5 of the RNP seeks to "To protect existing employment provision and support future regeneration, diversification and expansion of employment opportunities." At a strategic level, the JCS and RNP are in accordance with the NPPF and seek to deliver economic growth. However, at a site specific level, the RNP seeks to resist development on the application site through Policy R6, a position that has been maintained since the first draft (Regulation 14) version of the Neighbourhood Plan was published for consultation (October 2015).
- 7.25 In assessing the weight that should be given to the proposed RNP Policy R6 designation in determining the application, reference must be made to NPPF paragraphs 16, 183-185 and 216. Paragraph 16 stresses a need for Neighbourhood Plans to "support the strategic development needs set out in Local Plans, including policies for housing and economic development". Given the stance of the NPPF regarding the need for Neighbourhood Plans to support strategic development, there are serious questions how far the designation of an area of open space without direct public access and not in the ownership of the Town Council would accord with this aspect of national policy. It should also be borne in mind that the owner of the site has objected to policy R6 of the RNP.
- 7.26 Paragraph 184 of the NPPF provides further guidance as to the role of Neighbourhood Planning. This states that neighbourhood plans should not undermine the strategic policies of the Local Plan. However, much would depend upon the justification for the Policy R6 (figure 5 page 25) designation; i.e. whether it could be demonstrated that this would be critical to: "Improve visual and physical linkages between the rivers and waterways and adjacent settlements by creating and maximising vistas to the valley/water and ensuring development, public realm and access are orientated to the valley/water" as required by policy 20(a) of the JCS.
- 7.27 Most importantly, NPPF paragraph 216 sets out how emerging development plan policies (in this case, the RNP) should be applied in decision making. Paragraph 216 states that:

"From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to;

- *the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
- *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given);*
and;
- *the degree of consistency of the relevant policies in the emerging plan to the*

policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)."

- 7.28 It may be argued that the RNP, having been submitted, is now at an advanced stage of preparation and greater weight can be afforded to it as per the first bullet point. However, in this case, the second bullet point is considered to be the key determinant and Members are advised that it is highly likely that the area of land marked as protected under policy R6 affected by the proposed development will not be included in the final adopted plan. However, this does not relinquish the responsibility of the local planning authority to ensure that the proposal does not have a detrimental impact on the character and appearance of the area and does not have a detrimental impact on Nene/Ise Valleys as required by policies 3, 19 and 20 of the JCS. These particular matters are considered later within this report.
- 7.29 The application proposals would contribute positively towards delivering the JCS job targets (policies 22 and 23). The application proposals consist of predominantly B8 (warehousing), supported by ancillary B1 (office and research) uses. Policy 24 of the JCS is therefore a relevant consideration which supports the principle of developing large scale strategic distribution (i.e. logistics) developments, where these comply with the spatial strategy (Policy 11). As stated, Policy 11 supports the growth of jobs at the Market Towns, so in this respect the application proposals must be regarded as in accordance with the spatial strategy.
- 7.30 It is noted that Policy 24 sets a threshold for the development of new warehousing, whereby schemes exceeding 9,300 sq. m floorspace should also include the provision of smaller employment units. Given that the application proposals would also deliver B1 uses (over 11,000 sq. m out of 93,000 sq. m; i.e. 12%) it must be regarded that this obligation has also been fulfilled.
- 7.31 In assessing the principle of development, it must be noted, as a starting point (and, therefore material consideration), that the application scheme is contrary to the policy R6 of the emerging RNP. Whether this could be sufficient to refuse the scheme is dependent upon the spatial policy direction set out in the NPPF and recently adopted JCS. The NPPF and JCS support further economic growth, where this is appropriate to Raunds' "Market Town" status (JCS Policy 11(1)(b)). Given that the application proposals would deliver significant additional jobs at an established strategic employment site, it would be difficult to argue that the scheme is in conflict with this aspect of the overall spatial development strategy.
- 7.32 Furthermore, it is repeated that the draft RNP Policy R6 designation for the application site remains the subject of an unresolved objection to the draft Neighbourhood Plan. In accordance with NPPF paragraph 216, this reduces the weight that could be given to the proposed Policy R6 designation in determining the application.
- 7.33 That said, consideration must also be given to the JCS green infrastructure policies (19 and 20), due to the potential of the application site to deliver a physical and visual linkage between the Nene Valley and Raunds urban area. Despite the proposed development being bounded to the north and south by designated public rights of way (UG38 and UG37, respectively), the rights of way themselves would remain intact following implementation of the development.
- 7.34 The proposals would need to fulfil the requirements of JCS policies 3, 19 and 20 to be acceptable (to be considered later in this report). If the scheme was deemed to have significant adverse landscape or green infrastructure impacts, then the proposed RNP Policy R6 designation could provide additional support in refusing the proposals.
- 7.35 Otherwise, the application proposal must be regarded as delivering significant additional economic growth at Raunds. Potential landscape and green infrastructure impacts and/or suitable mitigation measures are critical matters in assessing the application scheme. Notwithstanding policy 3, 19 and 20 of the JCS, given that the

NPPF and JCS, in principle, strongly support employment development and job creation at the Market Towns (JCS Policy 11(1)), there must be a presumption that the scheme is in general accordance with the adopted spatial strategy. Overall, there are no overriding planning policy objections, in principle, to the proposed Warth Park Phase 3 development.

7.36 Design

7.37 National guidance contained within the NPPF (Requiring Good Design) attaches great importance to the design of the built environment as good design is a key aspect of sustainable development. Good design should contribute positively to making places better for people. Well designed buildings that support a prosperous economy should also be supported. Planning decisions should aim to ensure that developments will function well and add to the overall quality of the area and are visually attractive as a result of good architecture and appropriate landscaping. Policy 8 of the JCS requires new development to comply with a number of sustainable principles including being of a high standard of design and conserving designated built environment assets.

7.38 In considering the proposal it is necessary to take into account the context of the development. Immediately to the rear (north) is the recently constructed building at unit 5. The proposed buildings will largely reflect the design of that building and will be constructed from a portal steel frame construction with a parapet roof edge. Both vertical and horizontal cladding in various shades of metallic grey are proposed. The dimensions of the buildings are as detailed at paragraph 7.5.

7.39 The proposed buildings are lower than the existing unit 5 building with a ridge height of +67.310m AOD on Plot 6a compared to +81.450m AOD on Plot 5 (14.14m difference). This is as a result of the natural topography of the site and the proposed ground remodelling.

7.40 It is considered that the buildings represent a development that will offer a high quality and aesthetic enhancement to the immediate vicinity. The proposed units represent high quality commercial buildings that integrate well with the surrounding context. In that respect, in terms of design the proposal is considered acceptable and in accordance with policy 8 of the JCS.

7.41 Noise

7.42 In support of the application, the applicant has submitted a Noise and Vibration report which has been considered by the ENC Senior Environmental Protection Officer (EPO). In considering the report, the EPO reported that noise from construction works can be dealt with via a planning condition to ensure that a Construction Management Plan is submitted for approval before any development commences.

7.43 With regard to noise from the operational use of the site, the EPO acknowledges that the proposal is for the two buildings to operate 24 hours per day, 7 days a week. However, while this maximum operation must be considered, further discussions with the future occupier, who will have a long lease on the buildings, the actual use based on their current operations is much less as the site does not operate during the night or at weekends. Traffic into and out of the site will be via London Road into Warth Park. There is no other vehicular access into the site.

7.44 Table 9.5 of the Noise Assessment states that there would be a negligible increase in traffic noise at receptors R1 and R5-7, no change at R4 and a reduction in traffic noise at R2 and R3 because of barrier effects of the proposed development. Details of the location of the noise receptors are contained at Appendix B.

7.45 In response to noise from traffic visiting and leaving the site, the EPO commented that,
"Operational noise was predicted for both day and night time use in agreement

with the acoustic consultant. The ambient and background survey data was interrogated to ensure the figures used are reliable and representative of the respective time period. Furthermore, a variety of standards and guidance levels were referred to in the assessment to determine whether predict noise would adversely impact on existing development.

From this it was predicted that general operational noise from vehicles moving around the site, both units, from general travelling, starting up, docking, unloading, etc. should be below the existing background noise levels at the nearest sensitive receptors (R1-R5). As such no mitigation measures are required."

7.46 With regard to reversing alarms, the EPO noted the concern that narrow band reversing alarms as noise can be very noticeable and can travel some distance. However, details supplied by the proposed occupier states that 82% of vehicles will be from their own fleet, which are all fitted with broadband (white noise) reversing alarms. Notwithstanding this, noise from both types of reversing alarms (narrow and broadband) were assessed. The main concern for the EPO was the southern boundary and an assessment was made from various positions along the southern façade of Unit 6A. Predicted noise levels indicate that in the majority of situations, from both narrow and broadband alarms, noise should not result in any adverse impact on existing development.

7.47 Although not required, the EPO requested that the applicant investigate the installation of an acoustic barrier (fence) along the southern boundary of the site which has direct line of sight to existing residential development. The reason for this is that there may be some uncertainty in acoustic modelling and it would also take into account meteorological conditions, in particular when the wind blows directly from the source to the receptor, which can increase noise levels. A 3 metre high acoustic barrier should reduce operational noise levels by 2 - 3dB and from reversing alarms by about 5dB resulting in levels being well within accepted criteria.

7.48 The EPO has confirmed that providing the acoustic barrier as detailed is installed, no objection to the proposed development on the grounds of noise is raised. A condition regarding the control of noise from plant and ducting systems is also proposed.

7.49 Flooding - The Environment Agency

7.50 Policy 5 of the JCS states that, "Development should, wherever possible, be avoided in high and medium flood risk areas through the application of a sequential approach considering all forms of flooding for the identification of sites and also the layout of development within site boundaries". Paragraph 100 of the NPPF also states that, "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere."

7.51 Paragraph 103 of the NPPF also states that, "When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test..."

7.52 The Environment Agency Flood Map confirms that the site is predominately located within Flood Zone 1, i.e. it is a place where the annual probability of flooding from rivers is reckoned to be less than 0.1% - a low probability. There is an isolated area of Flood Zone 2 and 3 along the length of the Hog Dyke within the site boundary. The application does not propose any development that will encroach on these areas. As such it is considered within the assessment that the development is located within Flood Zone 1.

7.53 Planning Practice Guidance states at Paragraph: 033 Reference ID: 7-033-20140306

states that, "Nor should it normally be necessary to apply the Sequential Test to development proposals in Flood Zone 1 (land with a low probability of flooding from rivers or the sea), unless the Strategic Flood Risk Assessment for the area, or other more recent information, indicates there may be flooding issues now or in the future (for example, through the impact of climate change)". The Environment Agency has not notified the local planning authority that the site has critical drainage problems.

7.54 A Flood Risk Assessment has been submitted in support of the application which the Environment Agency has considered and confirm that they have no objection to the proposed development, subject to conditions. The Environment Agency also state that the "discharge of surface water into the Raunds Hog Dyke will be at greenfield runoff rates which is acceptable (the Lead Local Flood Authority (LLFA) will approve the detail of this)."

7.55 **Drainage - Lead Local Flood Authority (LLFA)**

7.56 The LLFA have confirmed that, following the receipt of additional information regarding flow rates, provided the scheme is constructed according to the Flood Risk Assessment, the impacts of surface water drainage have been adequately addressed. The LLFA require the development to be carried out in accordance with the Flood Risk Assessment.

7.57 **Air Quality**

7.58 The EPO confirms that, "dust, generated during the construction phase and from emissions generated from vehicles travelling on the large length of onsite unpaved tracks, is the main air quality issue of concern. It mentions that although there are few high sensitivity human receptors within close proximity of the application site, that mitigation measures be put in place to prevent excessive dust being transported beyond the site. The effects from the construction activities will be mitigated by undertaking construction works in accordance with the Construction Management Plan." A condition requiring the submission of a Construction Management Plan is therefore required.

7.59 **Contaminated Land**

7.60 The EPO confirms that, "The applicant has submitted information with respect to any potential risks from contamination and no significant risk has been identified. Therefore, based on information received there is no objection to the proposal with respect to risks from contamination. However, the applicant should be mindful of the NPPF that where a site is affected by contamination the responsibility for securing a safe development rests with the developer and/or landowner." A planning condition requires the submission of additional information should unsuspected contamination be found.

7.61 **Impact on Public Rights of Way**

7.62 Existing rights of way and other publically accessible routes and footpaths run close to the site. In addition to Meadow Lane (identified as Bridleway Route UG38), Bridleway Route UG29 runs north-south to the west of the site close to the A45, and footpath route UG37 runs along the northern edge of the Hog Dyke south of the site, linking with route UG29 close to the south-west corner of the site. Meadow Lane will be sited between unit 5 and the buildings proposed as part of the development.

7.63 Meadow Lane provides a right of way to pedestrians, cyclists, equestrians and other traffic and forms a rural lane which connects Raunds to the Stanwick Lakes area, and beyond, on the western side of the A45 via an underpass. The applicant proposes significant improvements to Meadow Lane which includes resurfacing the lane along with creating a 60m landscape buffer with new landscaping and tree planting along the existing route.

7.64 The existing rights of way will not be diverted or stopped up as part of the development proposals. Moreover, the applicant is providing a further 2.2km of footpath to the south of the site to link the existing and proposed country parks. The underpass linking Meadow Lane to Stanwick Lakes will also be upgraded to deal with existing flooding issues at the underpass with the introduction of a boardwalk for pedestrian use.

7.65 **Nene Valley NIA/SPA/SSSI**

7.66 The site lies within the Nene Valley Nature Improvement Area (NIA) and adjacent to Stanwick Lakes which is designated as a Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI). The NIA was designated by the Government in March 2012 and extends from Daventry to Peterborough, including the River Nene and its main tributaries. NIAs are ecological networks established to reconnect wildlife habitats and helps species adapt to the challenges of climate change. At the heart of the NIA is the Upper Nene Valley Gravel Pits, a group of lakes and ponds along the Nene between Northampton and Thorpe Waterville, designated as a SPA and Ramsar site due to its international importance for migratory birds.

7.67 Policy 4 of the JCS states that a, "net gain in biodiversity will be sought and features of geological interest will be protected and enhanced through protecting existing biodiversity and geodiversity assets by:

- i. Refusing development proposals where significant harm to an asset cannot be avoided, mitigated or, as a last resort, compensated. The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations;
- ii. Protecting key assets for wildlife and geology, in particular the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar Site, from unacceptable levels of access and managing pressures for access to and disturbance of sensitive habitats;
- iii. Protecting the natural environment from adverse effects from noise, air and light pollution;
- iv. Where appropriate requiring developments to provide or contribute to alternative green infrastructure (Policy 19); and
- v. Ensuring that habitats are managed in an ecologically appropriate manner.

7.68 The application incorporates biodiversity enhancements such as semi-mature native tree and shrub planting and the construction of ponds. Natural England were consulted on the proposal and comment that, "Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection. The development would therefore be in compliance with Policy 4 of the JCS.

7.69 The Upper Nene Valley Gravel Pits SPA Supplementary Planning Document: Mitigation Strategy requires a contribution towards off set the disturbance caused by recreational uses of the SPA. A contribution is not sought as part of this application as the SPD explicitly refers to recreational disturbance caused by the development of additional dwellings in the consultation zone.

7.70 **Visual Impact and Green Infrastructure**

7.71 Policy 19 of the JCS emphasises the "special mixed urban and rural character of North Northamptonshire". In this case Meadow Lane (Bridleway UG38) and the Hog Dyke (Footpath UG37) could be argued to form an important connection between Raunds urban area and the Nene Valley.

7.72 Policy 19/Figure 17 of the JCS highlights the importance of the Nene Valley sub-regional green infrastructure corridor (Policy 19(a)(iii) and 19(b)) and Little Addington - Hargrave local corridor (Figure 17, 9c). The application site must be regarded with

reference to important green infrastructure connections (UG37/UG38); whereby it should contribute "towards the enhancement of ongoing maintenance of local green infrastructure corridors [local corridor 9c]" (Policy 19(c)). In this case, the local Green Infrastructure (GI) corridor (9c), could become effectively a tunnel between sheds. To fulfil the requirements of the JCS, it must be satisfactorily demonstrated that "net gains can be made to the range of functions, particularly those that improve access between the towns [i.e. Raunds] and their surrounding countryside [Nene Valley]" (Policy 19(c)).

7.73 Policy 20(a) provides further direction in respect of the relationship between Raunds and the Nene Valley. Alongside policies 3 and 19 of JCS, impacts of the application proposal must be assessed, as to whether these would: "Improve visual and physical linkages between the rivers and waterways and adjacent settlements by creating and maximising vistas to the valley/ water" (Policy 20(a)).

7.74 In assessing the proposal against policies 3, 19 and 20, particular consideration should be given to important vistas; notably views from the Stanwick - Raunds Road and Amos Lawrence Park. It is probable that the proposed warehouse buildings would have significant visual impacts, with respect to views from the south. Planning Policy advised that specific landscape advice could be sought to assess the application, to ensure that this is robustly assessed against the relevant Policy 3 criteria.

7.75 To ensure that the visual impact of the development is considered thoroughly, the Council has engaged an independent Landscape Consultant to assess the Landscape and Visual Impact Assessment submitted in support of the application. The Landscape Consultant has confirmed verbally that, in his professional opinion, given the context of the development, he would not raise an objection to the proposal on visual impact grounds. The full statement from the Landscape Consultant will be reported in the committee update.

7.76 **Archaeology**

7.77 The site lies to the south of the existing Warth Park development, south of Meadow Lane and west of London Road. It lies in a landscape characterised by occupation and other archaeological activity from the Neolithic period onwards, and including the Scheduled Monuments of West Cotton and Mallows Cotton deserted medieval settlements, as well as several areas of Iron Age, Romano-British and Saxon activity. The development area includes Cotton Henge, identified from aerial photographs and confirmed by evaluation in 1993.

7.78 The NPPF, in paragraphs 128 and 129, stresses the importance of pre application discussions in order to assess the significance of potential heritage assets. The applicant's archaeological consultant contacted the County Archaeologist to discuss evaluation of the site ahead of submission of the application. The results of the evaluation are discussed in the Cultural Heritage chapter of the Environmental Statement. The evaluation confirmed that Cotton Henge survives in reasonable condition and will be affected by the development; areas of Iron Age and Romano-British activity will also be impacted by the proposals.

7.79 The County Archaeologist has confirmed that no objections to the development are raised subject to a condition to secure the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority.

7.80 **Light Impact**

7.81 External lighting is proposed as part of the development. The Design and Access Statement states that, "External lighting will be provided with building mounted units and lighting columns, within the car and lorry parking areas, in order to provide a safe and secure working environment for the staff. However, all light fittings used will be specified to point downwards and will incorporate deflection shields, to prevent light

spillage upwards and minimise light pollution."

- 7.82 The Commission for Dark Skies (CfDS) was consulted on the application and comment that a condition should be imposed on all exterior lighting schemes for both units 6A and 6B to ensure that there is no upward waste light from any lighting source and that there is minimal illumination of the building's cladding from any light source in perpetuity. This is considered acceptable and a condition is suggested.
- 7.83 CfDS state further that they note that there is an intention to use white cladding in the upper reaches of both units. This is most concerning due to the high reflectivity of any light bounce that white cladding will cause as opposed to darker grey cladding. CfDS continue by stating that:

"the existing Howdens building clearly demonstrates this problem by night with the white cladding shining like a linear band across the horizon. The existing Howdens building has a good, directional lighting scheme but the upper white band still catches light bounce by night and daylight by day. This single white band of cladding destroys all attempts to minimise the buildings impact on the environment by day or night and the detrimental night time impact of reflected light from the cladding is mentioned in the Baseline Report (11.4.2) Darker grey cladding, we feel, would have solved this problem."

- 7.84 As a result of this, it is considered necessary to ensure that the reflectivity of the building is taken into account. Therefore, notwithstanding the proposed materials as shown on the elevational drawings, a condition will require the submission of a schedule of external materials to be approved by officers, with the applicant having indicated a willingness to reconsider the colour scheme.

7.85 Highway Safety and Parking

- 7.86 Access to the new units will be via the new estate road extension from Warth Park which will enter the site via the new Meadow Lane underpass. The entrances to the site will be designed to accommodate vehicle queuing, particularly at the main entrance barrier control point which will help to manage and contain the flow of traffic both into the site and back out onto the roads.
- 7.87 A separate dedicated car park entrance will eliminate a conflict between goods vehicles and car traffic. The car park areas will be constructed in dense bitumen tarmac and block paving which will form part of a coordinated hard landscaping strategy. Car parking standards in relation to NCC standards are appropriate for the use classes in question. Provision has also been made for covered cycle and motorcycle spaces located adjacent to the main office block. Parking figures are detailed at paragraphs 7.8 - 7.10.
- 7.88 The new estate road extension will incorporate pedestrian footpaths with lighting by street lamps during hours of darkness. Pedestrians entering the site will do so via the car park. Footpaths lead from the car park to the ancillary office main entrance. Tactile paving and dropped kerbs will be provided at all road junctions, with further paving extended around offices and to the warehouse perimeter.
- 7.89 The development has been laid out to achieve accessibility for disabled occupants. All disabled car-parking bays will be located as close to the main entrance as possible, with cycle shelters providing security and protection for bicycles. Safe pedestrian routes from these shelters will meet up with the route between car park and warehouse. All levels within the car park will have a gradient of less than 1:25, enabling wheelchair access and ambulant disabled to access the site without difficulty.
- 7.90 The County Council as Local Highway Authority and Highways England were consulted on the application and, subject to conditions, do not raise any objection to the development. The conditions require the submission of additional details for surfacing,

maintenance of the bridge and additional structures such as wooden benches, picnic areas and the landscaped corridor. Highways England require details of operational lighting during construction to ensure glare onto the A45 is avoided.

- 7.91 There will be no vehicle access to the development via Meadow Lane, except in the event of an emergency access to the development as the existing gate will be retained.
- 7.92 Matters relating to the upgrading of the two nearest bus stops on Marshalls Road with bus shelters, widened footway/waiting area and raised kerbs will be secured through a S106 contribution to ensure that there is no risk to NCC in the delivery of these works.
- 7.93 The applicant has stated that the development of the units will be phased. The Planning Statement clarifies the phasing and states:

"The application is to develop 93,341 sq. m. of floorspace in two buildings. These buildings would represent an extension (Phase 3) to Warth Park, and provide new and much needed accommodation for Howdens. Unit 6a would provide 64,681 sq. m., and Unit 6b would provide 28,660 sq. m., with both buildings accommodating a mix of B8 distribution with ancillary office accommodation, B1 office space, and B1b research and development space.

It is expected that the floorspace may be built in phases. The total amount of office (non-B8) floorspace within the buildings is likely to be completed following occupation on a timetable to be confirmed in the context of Howden's growth and requirements. The total amount of floorspace is identified on the submitted plans, with 'Phase 1' referring to the initial works, and 'Phase 2' showing the total (maximum) floorspace proposed including the post-occupation delivery of increased non-B8 space. This approach 'future proofs' these new buildings in the context of Howdens likely requirement for increased office and research accommodation (with a subsequent slight reduction in warehousing floorspace).

The planning application is therefore for the maximum total floorspace proposed including the office floorspace which would be provided by Phase 2. 'Phase 2' would not increase the external size of either unit, but would implement the full amount of B1 office and research and development space described above. This mix of uses is also that assessed by the Transport Assessment, and ensures a robust assessment of any likely impacts."

- 7.94 The phasing of the development does not have any implications for the granting of planning permission. The application seeks planning permission for two units and, should planning permission be granted, it is the decision of the applicant when and if the development starts, or if the entire development is completed.
- 7.95 However, the Local Highway Authority has expressed a concern that the roundabout on London Road would need realigning and widening should the increased office space as part of "Phase 2" be provided. As a result, a condition requiring works to the roundabout to be carried out is suggested.

7.96 Issues Raised by Objectors

- 7.97 The issues raised by objectors are at paragraph 6.1 of this report. The petition submitted against the development covers all the issues that have been raised by objectors. The petition has also been presented by the local MP to parliament. All of the issues that have been raised have been considered within this report (including the letter submitted in support of Raunds Town Council's objection) and it is considered that the benefits of approving the application outweigh any adverse impacts when assessed against the policies NPPF and the JCS, taken as a whole.
- 7.98 The issue of large vehicles missing the roundabout on London Road and then travelling into Raunds, whereby they have to turn around in residential areas, has been raised as

a further issue. No data regarding the frequency of these incidences has been provided so it is not possible to establish whether this is a just a problem of new drivers not seeing the signs for Warth Park or if it is having wider consequences. Certainly, the Local Highway Authority has not raised this particular matter as an issue in its consultation responses. However, the majority of the drivers visiting the proposed development work for the applicant and will make repeated visits to the site. Therefore, the incidences of large vehicles travelling to the proposed development and reversing in residential areas should be avoided.

7.99 **Planning Balance and Conclusion**

7.100 The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6 of the NPPF). The NPPF continues at paragraph 7 by stating that there are 3 dimensions to sustainable development; economic, social and environmental. These roles should not be undertaken in isolation, because they are mutually dependent.

7.101 Paragraph 14 clarifies that there is a presumption in favour of sustainable development. 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 impacts 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.

7.102 Paragraph 19 states that the, "Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system." Moreover, paragraph 187 of the NPPF also states that,

"Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the should area."

7.103 The development will secure substantial employment with some 600 full time jobs to be created. The site is within a sustainable location, close to public transport links and is well related to existing developments of a similar nature. The proposal would bring into public use a large swathe of privately owned land through the creation of an additional 13.5ha country park to sit alongside an existing 13.8ha park. The development also proposes significant landscape and biodiversity improvements along with the upgrading of Meadow Lane and an additional 2.2km footpath. The development is in accordance with the adopted North Northamptonshire Joint Core Strategy and the National Planning Policy Framework.

7.104 Therefore, the social and economic benefits, together with the environmental benefits set out at paragraph 7 of the NPPF are significant and of sufficient weight to clearly outweigh the harm that would be caused by the development. As a result, the proposal would represent sustainable development as defined in the NPPF.

7.105 There is no doubt that there is strong local feeling about this proposal, as reflected by the level of correspondence and the petition received objecting to the development. It

is recognised that the recommendation to approve planning permission will be disappointing for some local residents and the Town Council. The views of local residents and Parish/Town Councils are very important but they must be balanced against other considerations. In coming to a conclusion on this application, I have carefully considered all the representations made and balanced these against the provisions of the development plan and the NPPF. For these reasons the application is recommended for approval.

8. Other Matters

8.1 Should the Committee agree with the recommendation and approve planning permission, it would be subject to a legal agreement under s106 of the Town and Country Planning Act (as amended) to secure the following:

- £100, 000 towards Construction Futures;
- Securing works required to upgrade Meadow Lane and its future maintenance;
- Provision of the Country Park and its future maintenance; and
- Securing works to upgrade the two nearest bus stops on Marshalls Road with bus shelters, widened footway/waiting area and raised kerbs.

9. Recommendation

9.1 That, subject to the applicant entering into a legal agreement within 6 months of the decision date, conditional planning permission is granted. Should the applicant fail to enter into an agreement within 6 months, the application will be referred back to Planning Management Committee with a resolution to refuse planning permission.

10. Conditions/Reasons -

1. The development to which this permission relates shall be begun not later than the expiration of three years beginning with the date of this permission.

Reason - To comply with the provisions of Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall not be carried out except in accordance with the following approved drawings and plans:

P100 Rev A (Demise Location Plan)
P102 (Parameters Plan)
P103 Rev A (Proposed Site Plan Phase 1)
P104 Rev A (Proposed Site Plan Phase 2)
P010 (Unit 6A Building Plan)
P011 (Unit 6A Main Office Plan)
P012 (Unit 6A Pod Office Plan)
P013 (Unit 6A Roof Plan)
P014 (Unit 6A Elevations)
P015 Rev A (Unit 6A Security Fence Details)
P016 (Unit 6A Security Gatehouse)
P017 (Unit 6A Car Park Deck)
P018 (Unit 6A Cycle Shelters)
P030 (Unit 6B Building Plan)
P031 (Unit 6B Main Office Plan)
P032 (Unit 6B Roof Plan)
P033 Unit 6B Building Elevations)
P034 Rev A (Unit 6B Security Fence Details)
P035 (Unit 6B Security Gatehouse)
P036 (Unit 6B Cycle Shelters)
0116/001 (Meadow Lane Bridge Proposed General Arrangements)

4475-L-11 Rev K (Landscape Concept Plan)
Design and Access Statement Rev B
Planning Statement October 2016
15-0773-103 Rev C (Proposed Site Contours)
15-0773-200 (Site Access Road General Arrangement)
15-0773-201 (Typical Section and Centreline Long Section (Access Road))
15-0773-202 Rev A (Retaining Wall Sections)
15-0773-250 Rev B (Preliminary Drainage Layout)
15-0773-251 Rev A (Overland Flood Flows)
1235/1 (Soils and Agricultural Use and Quality)
ADC-1479-001 Rev D (Access Roundabout Amendments)
Construction Management Plan dated September 2016 (Ref : CEMP/Warth Park/KB)
Flood Risk Assessment (FRA) undertaken by THDA Consulting Engineers (dated 16 September 2016)
Reason: To clarify the terms of the planning permission.

PRE-COMMENCEMENT CONDITIONS

3. Details of any external lighting shall be submitted to, and approved in writing by, the Local Planning Authority prior to the commencement of the development. This information shall include a layout plan with beam orientation and schedule of equipment in the design (luminaire type; mounting height; aiming angles and luminaire profiles). The means of illumination of the subject of this consent shall not be of a flashing or intermittent nature. The approved scheme shall be installed, maintained and operated in accordance with the approved details.

Reason: To protect the appearance of the area, the environment and wildlife and local light-sensitive development from light pollution and to ensure adequate safety and security on site

4. No development shall take place until a scheme for the provision and management of an eight metre wide buffer zone with ecological enhancement alongside the Raunds Hog Dyke shall be submitted to and agreed in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority. The buffer zone scheme shall be free from built development including lighting and formal landscaping.

The scheme shall include:

- a) plans showing the extent and layout of the buffer zone.
- b) details of the opportunity to restore the channel to a more natural form.
- c) details demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term. This should include the production of a management plan showing adequate financial provision and a named body responsible for its management.

Reason: In order provide appropriate biodiversity protection and enhancement in accordance with the National Planning Policy Framework, Anglian River Basin Management Plan, and Policies 1, 4 and 5 of the North Northamptonshire Joint Core Strategy.

5. No development shall take place within the area indicated until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority.
Reason: To ensure that features of archaeological interest.

6. The development hereby permitted shall not commence until the details of the temporary and task lighting to be addressed in the Addendum Plans have been submitted to and approved in writing by the local planning authority in consultation with

Highways England. The works shall then be carried out in accordance with the approved details.

Reason: To maintain the safety of A45 road users by the avoidance of glare.

7. Prior to the commencement of the development hereby approved, a plan showing full details of the finished floor levels in relation to existing ground levels on the site/existing and proposed site levels for the proposed development shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved finished floor levels plan.

Reason: To ensure the satisfactory appearance of the completed development

8. Prior to the commencement of the development hereby approved, and notwithstanding the submitted details, a revised schedule of the materials and finishes for the external walls and roof(s) of the development shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved materials.

Reason: To ensure the satisfactory appearance of the completed development

OTHER CONDITIONS

9. The development shall be carried out in complete accordance with the Construction Management Plan dated September 2016 (Ref : CEMP/Warth Park/KB.)

Reason: To limit the detrimental effect of demolition and construction works on adjoining residential occupiers by reason of nuisance.

10. No demolition or construction work (including deliveries to or from the site) shall take place on the site outside the hours of 0800 and 1800 Mondays to Fridays and 0800 and 1300 on Saturdays, and at no times on Sundays or Bank Holidays unless otherwise agreed with the local planning authority.

Reason: To limit the detrimental effect of demolition and construction works on adjoining residential occupiers by reason of nuisance.

11. Prior to the operation of the premises, a scheme for the control of noise and vibration of any plant (including ventilation, refrigeration and air conditioning) or ducting system to be used in pursuance of this permission shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details. The equipment shall be maintained in a condition so that it does not exceed background noise level whenever it is operating as agreed with the Local Planning Authority. After installation of the approved plant no new plant or ducting system shall be used without the written consent of the Local Planning Authority.

Reason: To protect the residential amenity of the locality

12. The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) undertaken by THDA Consulting Engineers (dated 16 September 2016) and the Proposed Site Plan - Phase 1.

Reason: To ensure there is no increase in flood risk to third parties or the development itself. The FRA has confirmed that all development will be outside of flood zones 2 and 3 which is backed up by the plans submitted. It also confirms that any environmental mitigation and changes to land levels will take place in flood zone 1. The discharge of surface water into the Raunds Hog Dyke will be at greenfield runoff rates which is acceptable (the Lead Local Flood Authority will approve the detail of this).

13. Development shall proceed in accordance with the mitigation and enhancement Strategy of the FCPR Water vole and Otter report, appendix 6.5, dated October 2016.

Reason: In order to preserve and protect the existing otter population within and adjacent to the site.

14. The units within the development shall achieve a 'Very Good' rating under BREEAM UK New Construction 2014 (or such equivalent standard that replaces this) for the 'Shell and Core' stage and a 'Very Good' rating under BREEAM Refurbishment and Fit-out 2014 Parts 3 and 4.

1. Prior to commencement of works on site, a BREEAM UK New Construction 2014 (or such equivalent standard that replaces this) 'Shell and Core' pre-assessment report should be submitted, by the developer, and approved in writing by the Local Planning Authority to demonstrate how the retail units on site will achieve a 'Very Good' rating.

[Within 3 months of work starting on site, unless otherwise agreed in writing, a BREEAM UK New Construction 2014 (or such equivalent standard that replaces this) 'Shell and Core' Interim (Design Stage) Certificate, issued by the Building Research Establishment (BRE), must be submitted, by the developer, and approved in writing by the Local Planning Authority to show that a minimum 'Very Good' rating will be achieved by the retail units on site.]

Prior to occupation, unless otherwise agreed in writing, a BREEAM UK New Construction 2014 (or such equivalent standard that replaces this) Shell and Core Final (Post-Construction) Certificate, issued by the BRE, must be submitted, by the developer, and approved in writing by the Local Planning Authority to demonstrate that a 'Very Good' rating has been achieved by the retail units on site. All the measures integrated shall be retained for as long as the development is in existence.

2. Within 3 months of commencement of the fit-out of the building, unless otherwise agreed in writing, a BREEAM Refurbishment and Fit-out 2014 Parts 3 and 4 Interim (Design Stage) Certificate, issued by the Building Research Establishment (BRE), must be submitted, by the fit-out contractor, and approved in writing by the Local Planning Authority to show that a minimum 'Very Good' rating will be achieved by the retail units on site.

Within 3 months of first occupation, unless otherwise agreed in writing, a BREEAM Refurbishment and Fit-out 2014 Parts 3 and 4 Final (Post-Construction) Certificate, issued by the BRE, must be submitted, by the fit-out contractor, and approved in writing by the Local Planning Authority to demonstrate that a 'Very Good' rating has been achieved by the retail units on site. All the measures integrated shall be retained for as long as the development is in existence.

Reason - To ensure sustainable construction and reduce carbon emissions in accordance with Government guidance contained within the National Planning Policy Framework

15. Prior to the building being brought into the permitted use a scheme for the provision of external CCTV and access control shall be installed and retained thereafter, in accordance with details to be submitted to and approved in writing by the local planning authority.

Reason: In order to ensure adequate safety and security on site.

16. Before occupation of the building, the acoustic fence shown on drawing 116012_P015 A and 16012_P034 A shall be fully installed and permanently retained thereafter in perpetuity

Reason: In the interest of neighbour amenity

17. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that any unforeseen contamination encountered during development is dealt with in an appropriate manner.

18. The building hereby permitted shall not be brought into the permitted use until the parking and servicing areas for HGVs, cars, motorcycles and bicycles have been provided, surfaced and laid out in accordance with the approved plans.

Reason: In the interests of highway safety.

19. Before the development is brought into use the gates, fences and access control systems to site shall be installed and permanently retained thereafter.

Reason: In the interests of visual amenity, highway safety and security.

20. If, between the commencement of development and six months of the building having been completed (the date of which shall be confirmed in writing by the occupier to the local planning authority) it is brought to the attention of the Local Planning Authority that TV or radio interference to adjacent residential properties has occurred as a result of the erection of the buildings, details of measures to mitigate against such TV or radio Interference shall be submitted to the Council. These details shall be submitted by the applicant within 28 days of being advised by the Council that such problems are occurring, and subsequently approved in writing by the Local Planning Authority. The details of mitigation measures submitted shall be commensurate with the level of TV or radio Interference occurring and shall be implemented within a reasonable time period as directed by the Local Planning Authority.

Reason: In the interests of protecting local amenity and to alleviate any adverse electromagnetic interference.

21. Prior to the commencement of the development hereby approved, a landscaping scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme for landscaping the site shall include:-
- (a) details of the proposed tree and shrub planting including their species, number, sizes and positions, together with grass seeded/turfed areas,
 - (b) details of the existing trees and hedgerows to be retained as well as those to be felled, including existing and proposed soil levels at the base of each tree/hedgerow and the minimum distance between the base of the tree and the nearest edge of any excavation,
 - (c) details of the hard surface areas, including pavements, pedestrian areas, reduced-dig areas, boundary treatments, crossing points and steps.

Reason - In the interests of the visual amenities of the area, to ensure the creation of a pleasant environment for the development

22. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in accordance with BS 4428:1989 Code of Practice for general landscape operations (excluding hard surfaces), or the most up to date and current British Standard, in the first planting and seeding seasons following the occupation of the building(s) or on the completion of the development, whichever is the sooner. Any trees, herbaceous planting and shrubs which, within a period of five years from the completion of the development die, are removed or become seriously damaged or

diseased shall be replaced in the current/next planting season with others of similar size and species.

Reason - In the interests of the visual amenities of the area, to ensure the creation of a pleasant environment for the development

23. In advance of occupation of accommodation defined as 'Phase 2' relating to the provision of increased office accommodation within the units as shown on the approved Site Plan P004 Rev A a scheme of highways mitigation measures must be delivered at the access roundabout on London Road in general accordance with the scheme set out in drawing 1479/001D, with final details to be agreed in writing with NCC Highways and the LPA.

Reason: To mitigate anticipated off-site highways impacts and in the interest of highway safety.

Reason for decision

In reaching this decision this Council has implemented the requirement in the NPPF to deliver sustainable development in a proactive and positive way in accordance with paragraphs 186 and 187

Pre-Commencement Conditions

The details pursuant to conditions 3, 4, 5, 6, 7 and 8 are required prior to the commencement of development because they are critical to the material considerations of the scheme. The development or works would not be acceptable without these details being first approved.

Informatives

1. South of Plot 6B: We have identified that Anglian Water Services (AWS) own the land on the other side of the Raunds Hog Dyke for the length of Plot 6B south of the development. The applicant should liaise with AWS to restore the channel to a more natural form. Contact details: planningliaison@anglianwater.co.uk.
2. West of Plot 6B: The applicant should look to work with landowners for the remaining curtilage of the proposed development along the Raunds Hog Dyke west of plot B. Policy 4 (Biodiversity and Geodiversity) of the NNJCS seeks a net gain in biodiversity and geodiversity by managing development and investment to reverse the decline in biodiversity and restore the ecological network at a landscape scale in the Nene Valley Nature Improvement Area (NIA). The Raunds Hog Dyke flows under the A45 and falls within the Nene Valley NIA. Within Northamptonshire there are a number of projects in development with Highways England along the A14, A45 and A6. These projects are being developed by NIA partners Natural England and the Wildlife Trust on a site by site basis. There is good opportunity for further collaboration. The project lead for NIA is Matt Johnson matt.johnson@wildlifebcn.org.
3. It is worth noting that the Highways England Environment Designated Fund, which may be available to use, aims to help achieve benefits for biodiversity, landscape, flooding and water quality dependent on issue. A contact point for Highways England is Gareth Wilson gareth.wilson@highwaysengland.co.uk
4. This development may require a permit under the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of the Hog Dyke watercourse, designated a 'main river'. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

Note: The ecological enhancement scheme will need to comply with the Environmental Permitting Regulations

5. The developer will need to consult the Bedford Group of Internal Drainage Boards for consent for all works within 9m of an ordinary watercourse. Further information can be found at: <http://www.idbs.org.uk/documents/> Also a 9m buffer should be maintained between the edge of the watercourses for the maintenance access of relevant building and structures. All the building and structures should be located outside of the area of flood risk.

APPENDIX A – CONSULTATION RESPONSES

COMMISSION FOR DARK SKIES

CFDS is encouraged that the applicant wishes to take a responsible approach to sky glow and energy waste from Light Pollution which may result from the lighting schemes for units 6A and 6B.

We note that they intend to use energy efficient well directed lighting though out both these sites. We also note that the applicant has produced a Lighting Baseline Assessment which demonstrate, with the aid of night time photography, levels of light pollution from existing developments within the view point of the application site. These photos clearly demonstrate quite high levels of light pollution being generated by existing developments in the immediate vicinity of the application site. As a result, the applicant suggests that the local area be designated as an E2 Zone urban fringe with low to medium district brightness. CFDS agrees with this classification.

However, we wish to make it known that a number of these sources of light pollution being shown in some of the photographs are from lighting schemes which are outdated and inefficient. In addition to this, several lighting schemes adjacent to the application site are currently under investigation by ENC Planning Enforcement for possible breaches of condition for causing excessive light pollution.

CFDS accepts that the photographs supporting the baseline assessment might show the current levels of light pollution to date. However, should Planning Enforcement find breaches of lighting conditions in the near future, there may be a significant reduction in levels of energy waste from Light Pollution as a result of lighting being properly focussed within existing local developments.

With this in mind, we feel that there should be some guarding against accepting the current levels of light pollution shown in the baseline assessment photographs as the permanent long term levels of light pollution proximal to the application site.

From the supporting information on the construction of units 6A and 6B we note that there is an intention to use white cladding in the upper reaches of both units. This is most concerning due to the high reflectivity of any light bounce that white cladding will cause as opposed to darker grey cladding.

The existing Howdens building clearly demonstrates this problem by night with the white cladding shining like a linear band across the horizon. The existing Howdens building has a good, directional lighting scheme but the upper white band still catches light bounce by night and daylight by day. This single white band of cladding destroys all attempts to minimise the buildings impact on the environment by day or night and the detrimental night time impact of reflected light from the cladding is mentioned in the Baseline Report (11.4.2) Darker grey cladding, we feel, would have solved this problem.

Recommendations.

- 1) Set Planning Conditions on all exterior lighting schemes for both units 6A and 6B to ensure that there is no upward waste light from any lighting source and that there is minimal illumination of the building's cladding from any light source in perpetuity.
- 2) Refuse permission for the use of any white cladding on any aspect of units 6A and 6B.

Reasons.

- 1) To ensure the application conforms to NPPF Paragraph 125.
- 2) To ensure the application conforms to NNJPU PP4 and PP8

ENC ENVIRONMENTAL PROTECTION

Construction Management Plan

The submitted Construction Management Plan dated September 2016 must be complied with.

Air Quality Assessment

The air quality report highlights that dust, generated during the construction phase and from emissions generated from vehicles travelling on the large length of onsite unpaved tracks, is the main air quality issue of concern. It mentions that although there are few high sensitivity human receptors within close proximity of the application site, that mitigation measures be put in place to prevent excessive dust being transported beyond the site.

The effects from the construction activities will be mitigated by undertaking construction works in accordance with the construction management plan.

Please note that as the specific construction details of the development and the other committed developments in Warth Park are not yet known. Once these are finalised it would be preferable, if possible and viable to do so, that the construction times of the developments do not overlap in order to minimise the cumulative effects of construction generated dust.

I have been consulted on this planning application for two industrial/commercial units at the end of Scalley Way. The applicant has submitted information with respect to any potential risks from contamination and no significant risk has been identified. Therefore, based on information received I have no objection to this application with respect to risks from contamination. However, the applicant should be mindful of the NPPF that where a site is affected by contamination the responsibility for securing a safe development rests with the developer and/or landowner.

Noise

This application is for the construction of two storage/distribution buildings (Units 6A and 6B) to the south of Meadow Lane, Raunds. The proposed occupier of the buildings will soon be operating from a similar larger building located to the north in Phase 2 of Warth Park. The proposal is for the two buildings to operate 24 hours per day, 7 days a week. Whilst this maximum usage must be considered, further to discussions with the future occupier who will have a long lease on the buildings, the actual use based on their current operations is much less.

Environmental Protection has been asked to comment with respect to noise on this planning application, in particular operational noise. However, noise from construction works, especially earthworks as the site will need to be re-profiled, whilst touched on in the Environmental Statement (ES) can be dealt with by way of a planning condition or included in the construction management plan. However, it may be prudent to limit the hours that noisy works can take place as per the following condition:-

Construction work operational times:

No demolition or construction work (including deliveries to or from the site) that causes noise to be audible outside the site boundary shall take place on the site outside the hours of 0800 and 1800 Mondays to Fridays and 0800 and 1300 on Saturdays, and at no times on Sundays or Bank Holidays unless otherwise agreed with the local planning authority. Reason: To limit the detrimental effect of demolition and construction works on adjoining residential occupiers by reason of nuisance.

The impact of noise from additional traffic flow on existing residential development, generated by the proposed development, has been discussed in the ES. Traffic into and out

of the site will be off the main roundabout from London Road into Warth Park Way. There is no other vehicular access to the site. The increase in vehicle movements from the proposed development has been predicted for 2018 and compared to the predicted traffic flows from consented development as per Table 9.5 of the ES.

The impact of noise from traffic movements has been compared to Table 3.2 'Classification of Magnitude of Noise Impacts in the Short Term' taken from the Design Manual for Roads and Bridges (DMRB.) The DMRB gives guidance of current standards on the design, assessment and operation of motorways and trunk roads. However, the DMRB does state the standards of good practise may be applicable to other roads with similar characteristics. This is not an unreasonable approach.

From Table 9.5 it can be seen there would be a negligible increase in traffic noise at receptors R1 and R5-7, no change at R4 and a reduction in traffic noise at R2 and R3 because of barrier effects of the proposed development.

With respect to operational noise a further assessment has been submitted after discussions with the proposed occupier and their acoustic consultant as mentioned above. The proposed occupier has indicated the two units will only be operational Monday to Friday. This includes Friday night and Saturday morning. The number of trips and peak hours of operation, based on predicted use by the proposed occupier, are different to the generic hours used in the ES which assumed 24/7 operation of the site. Trips rates used in the ES were calculated with reference to empirical data provided by Roxhill for the operation of large scale warehousing and distribution, and TRICS data for similar developments.

Operational noise was predicted for both day and night time use in agreement with the acoustic consultant. The ambient and background survey data was interrogated to ensure the figures used are reliable and representative of the respective time period. Furthermore, a variety of standards and guidance levels were referred to in the assessment to determine whether predict noise would adversely impact on existing development.

From this it was predicted that general operational noise from vehicles moving around the site, both units, from general travelling, starting up, docking, unloading, etc should be below the existing background noise levels at the nearest sensitive receptors (R1-R5). As such no mitigation measures are required.

Of concern is the use of narrow band reversing alarms as noise from these can be very noticeable and travel some distance. However, details supplied by the proposed occupier states that 82% of vehicles will be from their own fleet, which are all fitted with broadband reversing alarms. Furthermore, the transport industry is moving towards the use of broadband reversing alarms and over the course of the next 5 years it is expected the vast majority of vehicles will be fitted with these devices. Notwithstanding this, noise from both types of reversing alarms were assessed. Our main concern being the southern boundary and an assessment was made from various positions along the southern façade of Unit 6A.

Predicted noise levels indicate that in the majority of situations, from both narrow and broadband alarms, noise should not result in any adverse impact on existing development.

Although not required, the applicant was asked to investigate the installation of an acoustic barrier (fence) along the southern boundary of the site. This boundary has direct line of sight to existing residential development. To put it in layman's terms a 'Belt and braces' approach was asked for. The reason for this is that there may be some uncertainty in acoustic modelling and it would also take into account meteorological conditions, in particular when the wind blows directly from the source to the receptor, which can increase noise levels.

The attenuation provided by an acoustic barrier along the southern boundary, between 2 and 4 metres high, was modelled for both operational noise and the use of reversing alarms. The optimal height was found to be 3 metres as little extra benefit could be demonstrated by having a 4 metres high barrier. A 3 metre high barrier should reduce operational noise levels

by 2-3dB and from reversing alarms by about 5dB resulting in levels being well within accepted criteria.

The applicant has subsequently submitted details of the acoustic barrier in the boundary treatment plans 16012_P015 A and 16012_P034 A. Providing the acoustic barrier as detailed in these plans is installed I would have no objection to the proposed development on the grounds of noise.

With respect to plant noise this has not been assessed as the exact location and type of fixed plant is unknown at present. Therefore, the following condition should be placed on the planning permission, if granted:-

Plant and ducting systems

Prior to the operation of the premises, a scheme for the control of noise and vibration of any plant (including ventilation, refrigeration and air conditioning) or ducting system to be used in pursuance of this permission shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details. The equipment shall be maintained in a condition so that it does not exceed background noise level whenever it is operating as agreed with the Local Planning Authority. After installation of the approved plant no new plant or ducting system shall be used without the written consent of the Local Planning Authority.

Reason: To protect the residential amenity of the locality

POLICE LIAISON OFFICER

Northamptonshire Police has no formal objection to the development as proposed. However, it is stated that secure and certificated products will be used and glazing will be a combination including laminated, these standards should be agreed in writing prior to commencement. The lighting scheme outlined needs to be detailed in the form of type of light, switching policy and a full site lux plan should be submitted.

NATURAL ENGLAND

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

THE RAMBLERS ASSOCIATION

Whilst we do not wish to comment on the merits of the proposed development, we welcome the commitment to improve Meadow Lane (UG38) and the A45 underpass. We note that public footpath UG37 is unaffected and other informal footpaths will be laid out as a result of the development.

The combined Open Space (country park) which will be created by this development and the existing Warth Park will create a large area of informal recreation for those employed on the site as well as local residents.

We are however concerned at the inconvenience that will be caused to the users of Meadow Lane whilst the new 'green bridge' is constructed. The Temporary Diversion route should follow the shortest route possible.

RAUNDS TOWN COUNCIL

The Town Council have engaged a planning consultant, Chris Akril; Director, Town Planning Services to support them in preparing a response to the above application.

Having considered the matter carefully and after listening to local representations to the Town Council wish to strongly object to this application. A detailed letter of objection is enclosed.

I am also forwarding onto you representations from local residents who have contacted the Town Council directly with their comments.

Whilst Raunds Town Council objects to this application, the council would like East Northamptonshire Council to be aware that if members of the Planning Management Committee are minded to approve the application then the Town Council will work with the developers and Howdens to ensure that suitable sustainable community facilities are provided for the Town.

Letter from Town Planning Services commissioned by Raunds Town Council

We have been instructed by Raunds Town Council to prepare these objections to the planning application for two distribution warehouse buildings made by Roxhill Warth 2 Ltd and Henry H Bletsoe And Son LLP on agricultural land south of Meadow Lane, Raunds.

The Town Council have carefully reviewed the planning application and held a public meeting prior to considering their own views on the planning application. The public meeting was held on the 30th November, attended by over 130 people. There were strongly held views amongst those present that these proposals would have significant adverse impacts on the character of the area and the quality of life enjoyed by local people. This strength of feeling has been reflected in the number of separate objections made against this application to date.

An anonymous ballot was carried out to quantify the level of support or objection to the proposals, allowing those in favour of the scheme to discreetly make that known. The survey results indicated that 97% were against the proposal and just 3% were in favour. The total number of submitted ballots was 124. This demonstrates that the proposals do not have the support of the local community.

The Town Council debated the application at their meeting of the 6th December, and reached the decision to strongly oppose the development for a number of reasons. These included the following:

Neighbourhood Plan

The proposed development would conflict with the Raunds Neighbourhood Plan, which has reached submission stage and will be subject to examination and put to referendum early in 2017. The Neighbourhood Plan designates an area of Protected Open Space to the South of Meadow Lane under Policy R6, which includes the application site. The development of such spaces will only be supported where: equivalent or better provision can be made in a suitably accessible location, or; the space is no longer required or suitable for use as an open space.

It is recognised that this policy does not yet form part of the development plan, but as a submission document weight should be afforded to it, increasing so at the Neighbourhood Plan advances through the remaining stages to adoption.

Prior to designating the site as Protected Open Space, the Town Council carried out a survey to better understand local views on the land lying to the south of Meadow Lane. The survey was distributed to every household in Raunds and Stanwick. The Council received 638

responses to the survey, with 94% of respondents wanting to keep the area as green space. Just 6% of respondents believed that the area was suitable for development.

The survey results demonstrate that Neighbourhood Plan Policy R6 has been subject to extensive local consultation already, and that there is overwhelming support for the protection of this area of land. Policy R6 seeks to protect the important countryside around the town from further development encroachment and reflects the wishes of the local community.

Nene Valley Nature Improvement Area

The proposals would be contrary to the aims of the Nene Valley Nature Improvement Area (NIA), which has been created to re-connect the natural areas along the River Nene from Daventry to Peterborough. The aim of the NIA was to deliver a step change in nature conservation, creating more and better connected natural habitats for wildlife to thrive and adapt to climate change.

The proposed development sits between the town and the designated NIA, which also includes the Upper Nene Valley Gravel Pits SPA / Ramsar site 50 metres from the boundary of the site. The Upper Nene Valley SSSI designation is also very close to the development. These designations are important at both an international and national level, and utmost care should be taken to ensure that they are protected.

Undertaking significant change to the landforms on the site will disturb the natural habitat in the surrounding area, not only during construction but also in the operation of the development. Substantial new buildings, associated traffic and activity amounting to hundreds of vehicle movements a day will have a negative impact upon the Nene Valley designations and the Nature Improvement Area.

The ecology chapter of the submitted ES is dismissive of the potential impact upon natural habitats close to the application site, even though it is recognised that breeding birds can be significantly disturbed by construction activity.

Cross referencing this to the air quality chapter of the ES, it is noted that it recognises that construction activities have the potential to create significant amounts of dust, including cement powder. The conclusion of the air quality assessment was that the risk of significant impact on the Ramsar site was low due to the prevailing winds blowing dust to the north east, in the opposite direction across Raunds instead. However, the potential impact should the wind direction not take that direction does not appear to have been assessed, and represents a significant risk.

Because of these potential risks, the application would not be in accordance with Paragraph 118 of the NPPF, which directs that applications on land (individually or cumulatively) that are likely to have an adverse effect on a SSI should not normally be permitted, even if they are outside the designated area.

Pollution from Emissions

It is evident from the submitted information that the number of vehicle movements created by the development will be substantial, and will lead to added traffic congestion along the A45 corridor, which is already a very busy route between the M1 and A14. The submitted transport assessment has calculated that there will be just under 800 HGV movements per day, running throughout the night. When coupled with vehicle movements on site, loading and unloading operations and shunting vehicles around the buildings will give rise to significant local pollution effects.

The increase in traffic to the site and along the A45 will have a detrimental impact upon local air quality conditions, having an adverse effect on the health and wellbeing of local residents, as well as the nearby Nature Improvement Area.

We would refer here to paragraphs 120 and 123 of the NPPF, which seek to protect health and quality of life from the impacts of development. The feedback from the local community is clear, that they are very concerned that this development will significantly impact upon the quality of life of those in the surrounding area.

Light Pollution

The development will invariably lead to added light pollution within the area, not only from the buildings, parking areas and access roads, but also from vehicle movements within the site and on the access road to the A45. The site will be highly visible at night from a wide area, particularly when the height of the buildings and surrounding development platform are taken into account.

Paragraph 125 of the NPPF requires the impacts of light pollution to be minimised. We are concerned that by its very scale and hours of operation, the proposed development will be unable to comply with this.

Noise Pollution

It has been noted from a review of the submitted noise assessment, that no specific noise mitigation measures are proposed for both the construction and operational stages of the development. The applicants have undertaken a noise survey, and based their assessment upon the five nearest receptors. However, local experience of the existing Warth Park development has shown that vehicle movements, lorries reversing alarms, loading and unloading activities already cause disturbance to a number of residents in the surrounding area.

Adding hundreds of additional vehicle movements and substantially increased activity as a result of this development will only exacerbate the situation and make living in the area unbearable for some. Approving a scheme of this size, in this position so close to Raunds and Stanwick will not protect the amenities of residents, further eroding the quality of these rural towns and villages.

Furthermore, the noise survey was undertaken over a single week in July, when trees were in leaf and represents a snap shot of the local climatic conditions at that time. Prevailing winds change, foliage on trees changes throughout the year, weather conditions present different levels of background noise. These factors could lead to the noise from the development being far worse on the surrounding area than the snapshot suggested in the environmental assessment.

We would again refer to paragraph 123 of the NPPF, which requires planning decisions to avoid noise that gives rise to significant impacts on health or quality of life.

Hydrology and Flood Risk

The Town Council are concerned that the development will have significant effects on the hydrology of the area, by creating 16,9 hectares of impermeable area and focusing surface water flows into one location served by attenuation ponds. Should these ponds prove insufficient to cope with prolonged heavy rainfall or storm events, then additional surface water could be discharged directly into the River Nene catchment, which is already under additional pressure created by new developments along the length of the river.

The new access to the development via an underpass under the existing route of Meadow Lane could be at risk from surface water flooding, creating access difficulties for the site. The submitted Flood Risk Assessment acknowledges this risk and refers to an alternative means of access using the footpath and cycle link from the development to Meadow Lane. Whilst this may be suitable for employees to escape from the site on foot, it would not be suitable for cars or HGV's. There is also a concern that emergency vehicles may not be able to access the site in a safe manner should the access underpass become blocked with floodwater.

Site levels and landform

The submitted site sections illustrate the changes being proposed to the existing site levels to create a level base for the development some 800 metres long and 480 metres wide. At the eastern end of the site, the land will be cut below the existing level of Meadow Lane, which would be approximately 10 metres above the finished floor level of the building. This would still leave approximately 8 metres of the building above a person walking along the lane. The Town Council are very concerned that this will create an overbearing effect, destroying the rural character of this attractive and well used route to Stanwick Lakes.

Coupled with the existing development on Warth Park, which is already on higher ground above Meadow Lane, a detrimental canyoning effect would be created, with large scale urban buildings and earthworks to each side, along with perimeter security fencing, security lighting and rows of vehicles parking around the perimeter.

At the western end of Meadow Lane, approaching Stanwick Lakes, where a person would currently enjoy views of the countryside, this will be replaced by tall embankments adjacent to the lane around 10 to 11 metres high to create the development ground level, with the building another 18.6 metres higher again. This will be southerly aspect of Meadow Lane, which will be in permanent shadow at certain times of the year.

Paragraph 64 of the NPPF requires development that does not improve the character or quality of an area and the way it functions should be refused. Paragraph 66 stipulates that applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. We are of the view that this proposal does not meet these basic requirements.

Impact on the Surrounding Landscape

The development would have a significant impact upon the setting of Raunds and Stanwick, and will be visible from a wide area, particularly the villages on the slopes of the Nene Valley. This is an attractive part of the Borough, and one that local people and visitors treasure for the recreation, wildlife and habitats that follow the river. The landscape assessment submitted with the application concludes that the negative visual effects of the scheme would be mitigated by the proposed landscaping scheme.

Firstly, it is highly doubtful that the landscaping will reach 29 metres high, and will not do anything other than green the lower slopes of the platform created for the buildings to be erected upon.

Secondly, impact of the development is assessed at completion and again at 10 years, to demonstrate how the landscape will soften the scheme. Clearly, there will be many years leading up to this point, where the impact of the scheme on the surrounding landscape and rural character will be significantly higher than that assessed.

One of the core planning principles of the NPPF is there should be a recognition of the intrinsic character and beauty of the countryside, (Paragraph 17). This development would have a significant adverse impact on not only the local area, but also views across the Nene Valley from the surrounding area. It is simply not possible to adequately mitigate the harm caused by a building and earth-formed platform approaching 29 metres above ground level. This is not the right location for this development.

Summary

For these reasons the Town Council strongly opposes this development. The creation of new employment opportunities within the Borough are welcomed, however, this cannot be at all costs. The irreversible impacts of development on the landscape; character of the area; setting of Raunds and Stanwick and the surrounding villages; impact on amenity through noise, dust, emissions and light pollution; must take precedence in this instance.

The submitted Neighbourhood Plan seeks to protect this area of land from development, to protect the rural character of the area and those who regularly use Meadow Lane to connect to Stanwick Lakes. Allowing this development will seriously undermine the Neighbourhood Plan objectives, and will be against the wishes of the local community.

We respectfully request that these comments, including the views expressed by the local community and the well supported policies of the submitted Neighbourhood Plan are taken account when determining this application.

THE ENVIRONMENT AGENCY

We have no objection to the above application as submitted subject to the imposition of the following planning conditions on any planning approval.

Condition 1

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) undertaken by THDA Consulting Engineers (dated 16 September 2016) and the Proposed Site Plan – Phase 1.

Reason To ensure there is no increase in flood risk to third parties or the development itself. The FRA has confirmed that all development will be outside of flood zones 2 and 3 which is backed up by the plans submitted. It also confirms that any environmental mitigation and changes to land levels will take place in flood zone 1. The discharge of surface water into the Raunds Hog Dyke will be at greenfield runoff rates which is acceptable (the Lead Local Flood Authority will approve the detail of this).

Condition 2

Development shall proceed in accordance with the mitigation and enhancement Strategy of the FCPR Water vole and Otter report, appendix 6.5, dated October 2016.

Reason

In order to preserve and protect the existing otter population within and adjacent to the site, in accordance with National Planning Policy Framework (2012).

Condition 3

No development shall take place until a scheme for the provision and management of an eight metre wide buffer zone with ecological enhancement alongside the Raunds Hog Dyke shall be submitted to and agreed in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority. The buffer zone scheme shall be free from built development including lighting and formal landscaping.

The scheme shall include:

- a) plans showing the extent and layout of the buffer zone.
- b) details of the opportunity to restore the channel to a more natural form.
- c) details demonstrating how the buffer zone will be protected during development

and managed/maintained over the longer term. This should include the production of a management plan showing adequate financial provision and a named body responsible for its management.

Reason

In order provide appropriate biodiversity protection and enhancement in accordance with the National Planning Policy Framework, Anglian River Basin Management Plan, and Policies 1, 4 and 5 of the North Northamptonshire Joint Core Strategy.

This condition is supported by the National Planning Policy Framework (NPPF), paragraph 109 which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. The Natural Environment and Rural Communities Act which requires Local Authorities to have regard to nature conservation and article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged. Such networks may also help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the Anglian River Basin Management Plan (RBMP). In England and Wales compliance with the Water Framework Directive is achieved through meeting the requirements of the relevant RBMP.

The Raunds Hog Dyke falls within the Anglian RBMP and currently has a status of moderate. The Anglian RBMP requires the Raunds Hog Dyke to have an overall status of Good by 2027. An updated RBMP (2015) plan can be found at:

<https://www.gov.uk/government/collections/river-basin-management-plans-2015#anglian-river-basin-district-rbmp:-2015>

Policy 1 (Sustainable Development) of the North Northants Joint Core Strategy (NNJCS) aims to secure development that improve environmental conditions meeting the challenges of climate change and protecting/enhancing the provision of ecosystems services.

Policy 5 (Water Environment, Resources and Flood Risk Management) of the NNJCS states that development should contribute towards the protection and improvement of the quality of the water environment through development designed from the outset to incorporate sustainable drainage wherever practicable and investing in enhancement and restoration where opportunities exist.

As you are aware the discharge of planning conditions rests with your Authority. It is, therefore, essential that you are satisfied that the proposed draft condition meets the requirements of paragraph 4 of the National Planning Practice Guidance (Use of Planning Conditions, section 2). Please notify us immediately if you are unable to apply our suggested condition, as we may need to tailor our advice accordingly.

We ask to be consulted on the details submitted for approval to your Authority to discharge this condition and on any subsequent amendments/alterations.

Information for the LPA/applicant – scheme requirements

Hog Dyke

We recognise an ecological impact assessment has been completed and forms Chapter 6 of the Environment Statement (ES). Of particular relevance to the Raunds Hog Dyke is the recognition of the potential impact during the construction phase and operation of the development on the quality of the water of the resulting in the degradation of habitat structure and function. To avoid this the ES states that best practice will be adopted to avoid pollution spillage during the construction phase. We would like further details added demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term.

The ES states that to minimise impact on the water quality of the Raunds Hog Dyke surface water drainage should be disposed through the use of sustainable drainage systems and kept at existing green field run off rates. We recognise in the FRA that discharge of surface water into the Raunds Hog Dyke will be at green field run off rates. To assist in the continued dilution of treated effluent with the Hog Dyke, and prevent deterioration the point of discharge should remain the same.

Restoring the channel

There is an opportunity to improve the ecology of the Raunds Hog Dyke along the curtilage of the proposed development. The existing channel has been heavily altered in the past adjacent to this proposed development. Any scheme to restore the channel to a more natural form should consider meanders, low flow berms, tree planting for shade, and restoration of the gravel bed of the dyke, preferably using limestone gravel. This is particularly relevant to the straightened dyke between the Raunds Sewage Treatment Works and Scalley Farm track.

Collaboration opportunities

South of Plot 6B

We have identified that Anglian Water Services (AWS) own the land on the other side of the Raunds Hog Dyke for the length of Plot 6B south of the development. The applicant should liaise with AWS to restore the channel to a more natural form. Contact details: planningliaison@anglianwater.co.uk.

West of Plot 6B

The applicant should look to work with landowners for the remaining curtilage of the proposed development along the Raunds Hog Dyke west of plot B. Policy 4 (Biodiversity and Geodiversity) of the NNJCS seeks a net gain in biodiversity and geodiversity by managing development and investment to reverse the decline in biodiversity and restore the ecological network at a landscape scale in the Nene Valley Nature Improvement Area (NIA). The Raunds Hog Dyke flows under the A45 and falls within the Nene Valley NIA. Within Northamptonshire there are a number of projects in development with Highways England along the A14, A45 and A6. These projects are being developed by NIA partners Natural England and the Wildlife Trust on a site by site basis. There is good opportunity for further collaboration. The project lead for NIA is Matt Johnson matt.johnson@wildlifebcn.org.

It is worth noting that the Highways England Environment Designated Fund, which may be available to use, aims to help achieve benefits for biodiversity, landscape, flooding and water quality dependent on issue. A contact point for Highways England is Gareth Wilson gareth.wilson@highwaysengland.co.uk.

Environmental Permitting Regulations

This development may require a permit under the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of the Hog Dyke watercourse, designated a 'main river'. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Note: The ecological enhancement scheme will need to comply with the Environmental Permitting Regulations.

NORTHAMPTONSHIRE COUNTY COUNCIL ARCHAEOLOGIST

The site lies to the south of the existing Warth Park development, south of Meadow Lane and west of London Road. It lies in a landscape characterised by occupation and other archaeological activity from the Neolithic period onwards, and including the Scheduled Monuments of West Cotton and Mallows Cotton deserted medieval settlements, as well as several areas as of Iron Age, Romano-British and Saxon activity. The development area includes Cotton Henge, identified from aerial photographs and confirmed by evaluation in 1993.

The NPPF, in paragraphs 128 and 129, stresses the importance of pre application discussions in order to assess the significance of potential heritage assets. The applicant's

archaeological consultant contacted me early in 2015 to discuss evaluation of the site ahead of submission of the application. The results of the evaluation are discussed in the Cultural Heritage chapter of the ES. The evaluation confirmed that Cotton Henge survives in reasonable condition and will be affected by the development; areas of Iron Age and Romano-British activity will also be impacted by the proposals.

In light of these results, further mitigation work will be needed in advance of development to investigate and record the archaeological remains. This can be achieved with the use of a suitable condition. I note that some of the area of archaeological interest lies in the identified fill zone, down slope, but it is not considered suitable to attempt to preserve a small part of a discrete site in these situations, and given the amount of earthmoving required it would be logistically more difficult to do so. I will of course be happy to discuss detailed proposals for mitigation with the applicant's archaeological consultant.

The proposed development will have a detrimental impact on any archaeological remains present. This does not however represent an over-riding constraint on the development provided that adequate provision is made for the investigation and recording of any remains that are affected. In order to secure this please attach a condition for an archaeological programme of works as per NPPF paragraph 141 to any permission granted in respect of this application.

Our standard condition is worded as follows:

Condition: No development shall take place within the area indicated until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority.

Reason: To ensure that features of archaeological interest.

CLIMATE INTEGRATED SOLUTIONS

CIS are satisfied with the fabric first approach undertaken in the statement, however with respect to the renewable energy assessment, CIS do not understand the premise within the statement that Solar PV is considered a 'bolt on' technology where Solar Thermal is not. Forethought in the design process would have allowed for multiple options for building integrated solar PV to be utilised to great effect. The present table itself contradicts the idea that it is a bolt on solution by showing one of the benefits to be 'easily integrated into building design'. It is also estimated that less than 10% of the intended roof space would need to be utilised for solar PV to meet (or offset) all (100%) of the sites anticipated electrical needs, including the parasitic demand resulting from the use of the air source heat pumps.

It is CIS's view that further explanation/ justification for exclusion of Solar PV on what appears to be a significant opportunity for a large commercially viable solar array should be provided.

BREEAM

The applicant has undertaken a BREEAM (Building Research Establishment's Environmental Assessment Method) pre-assessment and produced a BREEAM Report on behalf of Roxhill Developments Ltd to support a planning application for the proposed development of two distribution centres with ancillary office space known as Warth Park Plot 6a and 6b.

This report details the performance of Warth Park 6a and 6b against the BREEAM 2014 New Construction Industrial Shell and Core Design Stage criteria. The building currently achieves a score of 57.9% which translates into a BREEAM rating of VERY GOOD. It appears that mandatory credits are being targeted to ensure a very good rating is obtained.

CIS comments

The assessment as stated is for Shell and core design only and not final fit out. This ordinarily would be acceptable for industrial development where the final end user is not yet known and would reflect the stage to which the developer would take the building in advance of occupation. However in the case of this application the intended occupier (Howdens) is known and identified within submitted documentation. As such it is likely that details of the final fit out of the buildings will either be part of the same developers remit or will be known by the client.

CIS therefore question the use of a Shell and Core assessment in this circumstance and note that a certification for shell and core does not equate to a final fix achievement of BREEAM 'Very Good'. We would therefore recommend that further assurances/details are provided that the final 'as built' development will achieve a full certification to the required assessment rating and not only for the primary construction phase. The applicant (or fit-out contractor) should therefore carry out a BREEAM Refurbishment and Fit-Out (Parts 3 and 4) assessment.

To this end CIS have provided a recommended condition which recognises the distinction between the various certification stages. However if the same developer is carrying out the fit out. We would recommend a fully fitted BREEAM 2014 New Construction assessment over the 2 separate assessments. If this is the case CIS can update the recommended condition, a pre-assessment for the fully fitted development would need to be produced by the applicant.

Conclusions

CIS cannot find any policy related reason where the development should not be approved at this stage. However further evidence and assurances are sought to ensure that the aims of Policy 9 of the JCS are being met:

Actions for applicant

- 1) Please provide further justification for exclusion of solar PV as a viable option on this development.
- 2) Please submit BRUKL reports as referenced within the submitted Energy Strategy
- 3) Please provide details of client commitment to completion of the BREEAM assessment to achievement of a very good rating following final fix and fit out.

Recommended Condition

The units within the development shall achieve a 'Very Good' rating under BREEAM UK New Construction 2014 (or such equivalent standard that replaces this) for the 'Shell and Core' stage and a 'Very Good' rating under BREEAM Refurbishment and Fit-out 2014 Parts 3 and 4.

1. Prior to commencement of works on site, a BREEAM UK New Construction 2014 (or such equivalent standard that replaces this) 'Shell and Core' pre-assessment report should be submitted, by the developer, and approved in writing by the Local Planning Authority to demonstrate how the retail units on site will achieve a 'Very Good' rating.

[Within 3 months of work starting on site, unless otherwise agreed in writing, a BREEAM UK New Construction 2014 (or such equivalent standard that replaces this) 'Shell and Core' Interim (Design Stage) Certificate, issued by the Building Research Establishment (BRE), must be submitted, by the developer, and approved in writing by the Local Planning Authority to show that a minimum 'Very Good' rating will be achieved by the retail units on site.]

Prior to occupation, unless otherwise agreed in writing, a BREEAM UK New Construction 2014 (or such equivalent standard that replaces this) Shell and Core Final (Post-Construction) Certificate, issued by the BRE, must be submitted, by the developer, and approved in writing by the Local Planning Authority to demonstrate that a 'Very Good' rating has been achieved by the retail units on site. All the measures integrated shall be retained for as long as the development is in existence.

2. Within 3 months of commencement of the fit-out of the building, unless otherwise agreed in writing, a BREEAM Refurbishment and Fit-out 2014 Parts 3 and 4 Interim (Design Stage) Certificate, issued by the Building Research Establishment (BRE), must be submitted, by the fit-out contractor, and approved in writing by the Local Planning Authority to show that a minimum 'Very Good' rating will be achieved by the retail units on site.

Within 3 months of first occupation, unless otherwise agreed in writing, a BREEAM Refurbishment and Fit-out 2014 Parts 3 and 4 Final (Post-Construction) Certificate, issued by the BRE, must be submitted, by the fit-out contractor, and approved in writing by the Local Planning Authority to demonstrate that a 'Very Good' rating has been achieved by the retail units on site. All the measures integrated shall be retained for as long as the development is in existence.

HIGHWAYS ENGLAND

Annex A Highways England recommended Planning Conditions

HIGHWAYS ENGLAND ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to the Full Planning Application 16/02119/FUL and has been prepared by Martin Seldon.

The submission includes a Transport Assessment that evaluates the likely impact of the development on the SRN. We have reviewed the methodology employed to calculate the trip generation and distribution associated with the proposal and have determined it provides a robust assessment. Furthermore, it incorporates a capacity assessment for the A45/B663/Raunds Rd roundabout, which is the closest point of impact on the SRN. This assessment has been carried out using ARCADY and having reviewed the geometric parameters and flows that have been input, we have determined it provides an appropriate analysis of the likely impact of the development on this junction. The ARCADY outputs show that the development will not have a material impact on the operation of the SRN. Therefore we have no objection to the proposal in highway capacity terms.

It is noted that the applicant has carried out an assessment of the likely significant effects of the proposed development in terms of lighting, submitted within the Chapter 11 of the Environmental Statement (ES) and supported by Appendices 11.1 and 11.2.

As stated in Tables 11.7 and 11.8 of the ES, temporary and operational lighting can cause a problem of glare for the A45 users' safety. The same tables suggest that the potential of glare due to construction lighting will be eliminated with the implementation of the CEMP, whilst the lighting effects on drivers deriving from operational lighting will be eliminated thanks to the implementation of the Lighting Strategy.

Since these matters are to be addressed in Addendum Plans not yet submitted (Appendix A of the CMP), the applicant will need to ensure that the potential glare issues can be fully controlled with regards to the A45.

Therefore, having reviewed the information submitted, Highways England recommends that the condition below be attached to any planning permission that may be granted.

Condition: The development hereby permitted shall not commence until the details of the temporary and task lighting to be addressed in the Addendum Plans have been submitted to and approved in writing by the local planning authority in consultation with Highways England. The works shall then be carried out in accordance with the approved details.

Reason: To maintain the safety of A45 road users by the avoidance of glare.

PLANNING POLICY

- 1.1 The latest application proposes a further extension to the (now mostly complete) Warth Park employment area. The application proposes expansion of Warth Park, to the south of Meadow Lane.
- 1.2 These proposals would deliver an additional 93,341m² floorspace of B1 (offices/ research and development) and B8 (warehousing) to the west of Raunds. Given the scale of the scheme, the application proposals will represent a significant addition to the Warth Park employment area. It is therefore necessary to review the application with reference to the principle of development; i.e. conformity to the development plan and National Planning Policy Framework (NPPF).
- 1.3 In assessing the proposal, regard will need to be given to the following policies:
- NPPF, paragraphs 16-22, 58, 183-185, 196-198 and 216;
 - New spatial development strategy – North Northamptonshire Joint Core Strategy (JCS) 2011-2031 (Local Plan, Part 1), adopted 14 July 2016 – policies 11, and 22-24;
 - Raunds Neighbourhood Plan (RNP) 2011-2031, submitted 11 November 2016 – policies R6 and R14;
- 1.4 Critically, the recently submitted Neighbourhood Plan proposes designation of the application site as “protected open space”, whereby: *“Development...will only be permitted when...equivalent or better provision is made in a suitably accessible location; or the space is no longer required or suitable for use as an open space”* (Policy R6(25)). The Neighbourhood Plan also encourages new employment developments, provided that *“they do **not** lead to loss of open space”* (Policy R14(d)).
- 1.5 The application scheme would lead to the loss of a proposed “protected open space”. The proposed Policy R6(25) designation is substantive area of agricultural land without general public access; albeit bounded to the north and south by public rights of way (UG37 and UG38). Therefore the proposed Warth Park Phase 3 would be contrary to the submission Neighbourhood Plan. That said, the RNP has only recently been submitted and is now under consultation (Regulation 16, Neighbourhood Planning (General) Regulations 2012, as amended; **2 December 2016 – 30 January 2017**). Therefore, to fulfil the requirements of NPPF paragraph 216, consideration should be given to these emerging policies in determining the application.
- 1.6 The scheme’s conflict with the emerging Neighbourhood Plan gives rise to a significant Planning Policy issue; i.e. **what weight should be accorded to relevant policies in the NPPF, JCS and RNP in determining the application?** This response will provide analysis as to how these policies ought to be applied in determining the application.

2.0 National Planning Policy Framework, March 2012

- 2.1 The NPPF defines overarching national policy in two regards:
- Delivering sustainable economic development (Core planning principles, paragraph 17); and
 - Preparation/ application of development plan policies, in practice (i.e. the Local Plan and/ or Neighbourhood Plans).

Sustainable economic development

- 2.2 The NPPF (paragraphs 18-22/ section 1) places a firm emphasis upon securing economic growth and “*ensuring that the planning system does everything it can to support sustainable economic growth*” (paragraph 19). Paragraph 19 reiterates that planning should **encourage** sustainable growth, supporting existing business sectors.
- 2.3 In this respect, it must be highlighted that the NPPF strongly incorporates a general requirement for planning to support economic growth. The proposal is anticipated to deliver approximately 600 jobs (application form). This must be regarded as a means to deliver significant growth at Raunds, with wider potential economic benefits for the District as a whole.

Preparation/ application of development plan policies

- 2.4 The NPPF repeatedly stresses that decision making (the development management process) must be **plan-led** (paragraphs 17 and 196). The NPPF also highlights the importance of both the Local Plan and Neighbourhood Plans as integral elements of the planning system.
- 2.5 In this case, the recently-adopted JCS (Local Plan Part 1) seeks to provide “*for the workplaces, skills and sites to help build a more diverse, dynamic and self-reliant economy; one which is not overly dependent on in or out commuting*” (outcome 5). JCS Policy 1 requires a **positive approach** to be taken to considering development proposals, reflecting the NPPF presumption in favour of sustainable development.
- 2.6 JCS policies 22 and 23 reflect the NPPF emphasis on economic development, seeking to deliver a net increase of 31,100 jobs within North Northamptonshire (Policy 22), of which 7200 should be delivered within East Northamptonshire (Policy 23/ Table 3). Clearly, the application proposals could significantly contribute towards meeting these strategic job requirements.
- 2.7 By contrast to the adopted JCS, the emerging RNP seeks to protect the application site through designation of this land as “protected open space”. Alongside this, the RNP Vision seeks to deliver “*good employment opportunities*” (Aim of the RNP, p17). At a strategic level, the JCS and RNP (in accordance with the NPPF) seek to deliver economic growth. By contrast, at a site specific level, the RNP seeks to resist development on the application site, a position that has been maintained since the first draft (Regulation 14) version of the Neighbourhood Plan was published for consultation (October 2015).
- 2.8 In assessing the weight that should be given to the proposed RNP Policy R6 designation in determining the application, reference must be made to NPPF paragraphs 16, 183-185 and 216. Paragraph 16 stresses a need for Neighbourhood Plans to “*support the strategic development needs set out in Local Plans, including policies for...economic development*”. Questions must be raised as to how far the designation of a large area of protected open space without direct public access would accord with this aspect of national policy.
- 2.9 NPPF paragraph 184 provides further guidance as to the role of Neighbourhood Planning. This states that neighbourhood plans should not undermine the strategic policies of the Local Plan. However, much would depend upon the justification for the proposed Policy R6(25) designation; i.e. whether it could be demonstrated that this would be critical to: “*Improve visual and physical linkages between the rivers and waterways [River Nene] and adjacent settlements [in this case, Raunds/ Stanwick] by creating and maximising vistas to the valley/ water and ensuring development, public realm and access are orientated to the valley/ water*” (JCS Policy 20(a)).
- 2.10 Most importantly, NPPF paragraph 216 sets out how emerging development plan policies (in this case, the RNP) should be applied in decision making. It may definitely be argued that the RNP, having been submitted, is now at an advanced stage of preparation (paragraph 216, 1st bullet point). However, in this case, the 2nd

bullet point (paragraph 216) is considered to be the key determinant. Specifically, Roxhill (the applicant) objected to the proposed protected open space designation at the first draft (Regulation 14) consultation (October – December 2015) stage of the RNP.

2.11 Roxhill, promoters of Warth Park phase 3, specifically objected to the proposal to designate the land south of Warth Park/ Meadow Lane (submission RNP, protected open space site 25) as protected open space. Roxhill argued, in respect of this land (Raunds Consultation Statement, October 2016), that:

- It is an extensive area of land currently in agricultural use;
- It is not considered either deliverable, or appropriate as open space;
- It is not clear how this site relates to the criteria set in the draft NP of being 'demonstrably special' as defined in para 6.16;
- It is unclear how this area would be brought forward for use as public open space, how its management or maintenance would be coordinated or funded, and therefore what contribution it would make to the objective of meeting local needs and demands for high quality open spaces;
- Further thought should be given to the justification and rationale for that proposed open space allocation.

2.12 In short, Roxhill has already challenged the proposed Policy R6 designation for the application site, although this representation appears to be presented in terms of the national Local Green Space (NPPF paragraphs 76-78) designation, rather than the Policy R6 ("protected open space") designation. Notwithstanding, it must be recognised that Roxhill's objections have been considered through the Neighbourhood Plan process but, as yet, remain unresolved. Accordingly, NPPF paragraph 216 reduces the weight that could be attributed to Policy R6(25) in determining the application.

2.13 Overall, it must be noted that the NPPF gives overarching support to developments that secure economic growth. In respect of the specific conflict between the application proposal and the development plan, this exclusively relates to the proposed Policy R6 designation in the emerging RNP. While the application scheme is a greenfield development which would extend the built up area of Raunds, it must be assessed whether the application scheme could be contrary to the adopted Local Plan Part 1 (JCS) or NPPF. The proposed development is only explicitly in conflict with draft RNP Policy R6.

3.0 North Northamptonshire Joint Core Strategy 2011-2031, adopted July 2016

3.1 The adopted JCS is the principal development plan document (Local Plan Part 1) covering Raunds. Although a small number of policies from the 1996 District Local Plan (Local Plan Part 2) remain in force, none of these is relevant to determination of the current application.

3.2 Alongside detailed development management criteria (JCS policies 2-5 and 8), the application must be assessed in relation to the following matters:

- Would it accord with the overall spatial strategy; i.e. could it be regarded as sustainable development (policies 1 and 11)?
- Could it deliver green infrastructure benefits; i.e. strategic priorities for the Nene Valley (policies 19 and 20)?
- Would it deliver economic prosperity; i.e. would it contribute to delivering the JCS job targets and/ or sectoral priorities (policies 22-24)?

Overall spatial strategy

3.3 The spatial development strategy for Raunds is defined by JCS Policy 11(1)(b). This states that: "*The Market Towns will provide a strong service role for their local*

communities and surrounding rural areas with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town". Policy 1 links the JCS and NPPF paragraph 14 presumption in favour of sustainable development.

- 3.4 Clearly Roxhill's application scheme would deliver significant growth in jobs; in addition to the Warth Park Phase 2 developments that have already taken place during the Plan period to date (since 2011). Questions could be raised as to whether the scale of the proposed development would be appropriate to the character of Raunds, although in practice the development would form a further development phase for the strategic Warth Park employment area, which already constitutes a large scale employment site.

Green infrastructure

- 3.5 The draft RNP Policy R6 protected open space designation might potentially be linked to JCS Policy 19. Policy 19 emphasises the "*special mixed urban and rural character of North Northamptonshire*". In this case Meadow Lane (Bridleway UG38) and the Hog Dyke (Footpath UG37) could be argued to form an important connection between Raunds urban area and the Nene Valley.
- 3.6 Policy 19/ Figure 17 highlights the importance of the Nene Valley sub-regional green infrastructure corridor (Policy 19(a)(iii) and 19(b)) and Little Addington – Hargrave local corridor (Figure 17, 9c). The application site must be regarded with reference to important green infrastructure connections (UG37/ UG38); whereby it should contribute "*towards the enhancement of ongoing maintenance of local green infrastructure corridors [local corridor 9c]*" (Policy 19(c)). In this case, the local GI corridor (9c), could become effectively a tunnel between sheds. To fulfil the requirements of the JCS, it must be satisfactorily demonstrated that "**net gains** can be made to the range of functions, particularly those that improve access between the towns [i.e. Raunds] and their surrounding countryside [Nene Valley]" (Policy 19(c)).
- 3.7 Policy 20(a) provides further direction in respect of the relationship between Raunds and the Nene Valley. Alongside JCS policies 3 and 19, impacts of the application proposal must be assessed, as to whether these would: "*Improve visual and physical linkages between the rivers and waterways and adjacent settlements by creating and maximising vistas to the valley/ water*" (Policy 20(a)).
- 3.8 In assessing the proposal against policies 3, 19 and 20, particular consideration should be given to important vistas; notably views from the Stanwick – Raunds Road and Amos Lawrence Park. It is probable that the proposed warehouse buildings would have significant visual impacts, with respect to views from the south. It is advised that specific landscape advice could be sought to assess the application, to ensure that this is robustly assessed against the relevant Policy 3 criteria.
- 3.9 In this case, it might be argued that RNP Policy R6, which seeks to restrain development at the application site, could complement Policy 19. That said; it must be emphasised that the proposed Policy R6 designation has not been subject to independent examination through the Neighbourhood Plan process. This substantially reduces the weight that can be given to the specific designation in determining the application, although it could be argued that the proposed Policy R6 designation lends additional local direction to the adopted Local Plan green infrastructure policies (3, 19 and 20).

Economic prosperity

- 3.10 The application proposals would unequivocally contribute towards delivering the JCS job targets (policies 22 and 23). The application proposals consist of predominantly B8 (warehousing), supported by ancillary B1 (office and research) uses. JCS Policy 24 is therefore a relevant consideration.

- 3.11 Policy 24 supports the principle of developing large scale strategic distribution (i.e. logistics) developments, where these comply with the spatial strategy (Policy 11). As stated, Policy 11 supports the growth of jobs at the Market Towns, so in this respect the application proposals must be regarded as in accordance with the spatial strategy.
- 3.12 It is noted that Policy 24 sets a threshold for the development of new warehousing, whereby schemes exceeding 9,300m² floorspace should also include the provision of smaller employment units. Given that the application proposals would also deliver B1 uses (over 11,000 m², out of 93,000m²; i.e. 12%) it must be regarded that this obligation has been fulfilled.

4.0 Overview and conclusions

- 4.1 In assessing the principle of development, it must be noted, as a starting point (and, therefore material consideration), that the application scheme is contrary to the emerging RNP (Policy R6). Whether this could be sufficient to refuse the scheme is dependent upon the spatial policy direction set out in the NPPF and recently adopted Local Plan Part 1 (JCS).
- 4.2 The NPPF and JCS support further economic growth, where this is appropriate to Raunds' "Market Town" status (JCS Policy 11(1)(b)). Given that the application proposals would deliver significant additional jobs at an established strategic employment site, it would be difficult to argue that the scheme is conflicts with this aspect of the overall spatial development strategy.
- 4.3 Furthermore, the draft RNP Policy R6 designation for the application site remains the subject of an unresolved objection to the draft Neighbourhood Plan. In accordance with NPPF paragraph 216, this reduces the weight that could be given to the proposed Policy R6 designation in determining the application.
- 4.4 That said, consideration must also be given to the Local Plan green infrastructure policies (19 and 20), due to the potential of the application site to deliver a physical and visual linkage between the Nene Valley and Raunds urban area. Despite the proposed development being bounded to the north and south by designated public rights of way (UG38 and UG37, respectively), the rights of way themselves would remain intact following implementation of the development.
- 4.5 The proposals would need to fulfil the requirements of JCS policies 3, 19 and 20 to be acceptable. Additional bespoke landscape advice may be necessary to ensure the relevant landscape and green infrastructure policy criteria are satisfied. If the scheme was deemed to have significant adverse landscape or green infrastructure impacts, then the proposed RNP Policy R6 designation could provide additional support in refusing the proposals.
- 4.6 Otherwise, the application proposal must be regarded as delivering significant additional economic growth at Raunds. Potential landscape and green infrastructure impacts and/ or suitable mitigation measures must be critical matters in assessing the application scheme. Notwithstanding specific JCS Policy 3, 19 and 20 criteria; given that the NPPF and JCS, in principle, strongly support employment development and job creation at the Market Towns (JCS Policy 11(1)), there must be a presumption that the scheme is in general accordance with the adopted spatial strategy. **Overall, it is therefore concluded that there are no overriding Planning Policy objections, in principle, to the proposed Warth Park Phase 3 development.**

LEAD LOCAL FLOOD AUTHORITY

Having reviewed the applicant's submitted surface water drainage proposals located within, Warth Park Phase 3 Raunds Flood Risk Assessment Final version prepared by THDA Limited Consulting Engineers dated 16th September 2016, and Drawing 16-0773 – 250 Preliminary Drainage Layout prepared by THDA Limited Consulting Engineers dated 16th September 2016.

Report 1235/1, Soils and Agricultural Use and Quality, Land at Wrath Park Raunds prepared by Land Research Associates dated 5th September 2016 Drawing 251 Overland Flows rev A prepared by THDA Limited Consulting Engineers dated 2nd March 2017 We can consider that our previous concerns as per our consultation response dated 14th November 2016 have been addressed. As such, we can confirm that, provided the scheme is constructed according to the Flood Risk Assessment and documents referenced above, the impacts of surface water drainage have been adequately addressed.

The developer will need to consult the Bedford Group of Internal Drainage Boards for consent for all works within 9m of an ordinary watercourse. Further information can be found at: <http://www.idbs.org.uk/documents/> Also a 9m buffer should be maintained between the edge of the watercourses for the maintenance access of relevant building and structures. All the building and structures should be located outside of the area of flood risk.

NCC LOCAL HIGHWAY AUTHORITY

Lighting – we note your comments regarding not providing lighting along Meadow Lane and have no objection to this although it is likely to make NMU of this route less likely. We suggest that lighting along the new access road (along the shared cycleway) is provided for NMU users as an alternative route and would wish to have a condition imposed to this effect

Parking Deck – The plan shown in Appendix B does not show where the ramp is or the layout of the 147 spaces. The reason for requesting this information is to ensure the gradient of the ramp is not excessive and its impact on the parking arrangement both at ground level and on the deck itself. An elevation of the ramp and deck with dimensions would also be helpful. The gradient is 1:10 which is acceptable.

Tracking information for lorry access to the site and within it for manoeuvring – the tracking drawings in Appendix C resolve this query.

Cycle parking shelters – The drawings showing the details of the proposed cycle shelters in Appendix D are acceptable.

Modelling of the Stanwick Road/London Road/Wellington Road/Chelveston Road mini-roundabout as a signalised junction. The development leads to a small reduction in capacity. Phase 1 leads to a 1.9% reduction in practical reserve capacity (PRC) in the morning peak hour and a 2.5% reduction in PRC in the evening peak hour. Phase 2 leads to a 3.4% reduction in PRC at the junction in the morning peak hour and a 3.2% reduction in PRC in the evening peak hour. No mitigation could be justified.

Meadow Lane

We comment as follows:

- The bridge design needs to be suitable for equestrian use with parapets on either side of appropriate height and materials” – we note your response that appropriate parapets will be provided.

- A suitable maintenance agreement should be entered into by the developer to maintain the bridge. We note that the bridge will be maintained by the Roxhill site management company (similar to the existing estate road). We also note that the wooden benches, picnic areas and the landscaped corridor will also be maintained by Roxhill. Details of these agreements will need to be approved at reserved matter stage
- We note that an Approval in Principle (AIP) document for the design of the new bridge will be submitted on the grant of planning permission.
- We note that there would be no vehicle access to the development via Meadow Lane, except in the event of an emergency access the development as the existing gate will be retained.
- Details of the surfacing can be conditioned to be submitted and agreed with the County Council prior to construction at reserved matters stage.
- Regarding the upgrading of the two nearest bus stops on Marshalls Road with bus shelters, widened footway/waiting area and raised kerbs we would wish to see this conditioned to be provided by the applicant, rather than a S106 contribution, as then there is no risk to NCC in the delivery of these works.

APPENDIX B – RECEPTOR LOCATIONS

