Response from Tiffield Parish Council to Application No.: WNS/2021/1819/EIA

**Land North of The Bell Plantation Watling Street Towcester. Hybrid planning application comprising of:**

**Part A: Full planning permission for a new roundabout access from the A5; internal spine road, creation of development plots with associated earthworks and plateauing; delivery of plateaus and access for Towcester Town Football Club (TTFC); site-wide structural landscaping and infrastructure; and a single warehouse (Use Class B8) and ancillary office, with associated access, hardstanding, landscaping, parking and supporting infrastructure.**

**Part B: Outline planning permission with all matters reserved for the development of TTFC and employment floorspace falling within Use Classes B2 and B8, with ancillary office space on the development plots; as established through Part A of this application.**

FAO: Daniel Callis, Case Officer and J. Newton, Assistant Director ,Planning and Economyand Members of the Strategic Planning Committee**:** Councillor Phil Bignell (Chair), Councillor David James (Vice-Chair), Councillor Penelope Flavell, Councillor Andre Gonzalez De Savage, Councillor Enam Haque, Councillor Jonathan Harris, Councillor Rosie Herring, Councillor Stephen Hibbert, Councillor James Hill, Councillor Paul Joyce, Councillor Charles Manners, Councillor Jake Roberts, Councillor John Shephard.

**Summary of objections**

A full explanation and basis for each objection is to be found in the main body of this letter. Foe simplicity we refer to this application as being for the ‘Bell Plantation’ site. Our objections are set out in each of the sections below:

**1. ‘Major’ and conjoined developments.** We object to this application because:

* The total proposed warehousing floorspace for this site is more than 155,000sqm (1,245,492sqft) and the site covers 32.06 hectares (79.22 acres) in total. This development can in no way be described as ‘small’ or ‘medium’ and, indeed, is described in the planning document as a ‘major’ development. We object to this application as it contravenes the letter and spirit of the South Northamptonshire Part 2 Local Plan.
* We object to this application as we are concerned that splitting the site into the conjoined ‘Bell Plantation’ and Tiffield Lane developments is simply a strategy, despite their size, to make each of them appear to fit somehow into a lower sized category of development.

**2. Link road to the A5 from Tiffield Lane.** We object to this application because:

* We want reassurance from the developers and WNC that, if built, this link road would never offer an alternative access for private cars or any other vehicular traffic other than pedestrians, cyclists, buses and emergency vehicles to and from the A5 to the A43.
* Until that reassurance is forthcoming from this developer, we would object to this application due to the possibility of a link road being used as a ‘rat-run’.

**3. Link road as part of a Green Infrastructure project.** We object to this application because:

* Without a safe bridge crossing over the A43 and a link road as described in (2) above, this application does not provide safe, sustainable access to the site, nor does it enhance the green infrastructure network to and from Towcester.

**4. Traffic management to and from the site.** We object to this application because:

* This application does not mention at all how the developers’ ‘requirement’ and ‘discouragements’ to route traffic from the site will be monitored or enforced. Thus, their statements are merely intentions. Busy delivery drivers with deadlines to meet will be free to ignore this guidance. Smaller delivery vehicles especially will be effectively free to choose their own routes. We therefore object to this application on the grounds that this development will increase traffic through Tiffield and surrounding villages, especially at peak times.

**5. The volume of worker traffic to and from the site.** We object to this application because:

* This application will result in most workers at the site commuting from outside the immediate area into and from the site. Potentially, there will be some 2,700 worker movements per day into and from the site.
* A significant proportion of these would access the site through Tiffield and other villages, especially if there are delays on either the M1, A5 or A43. We therefore object to this application on the grounds that this development will increase traffic through Tiffield and surrounding villages, especially at peak times.

**6. Projected delivery vehicle movements.** We object to this application because:

* This application lacks effective oversight of the combined effects that this and other proposed developments will have on the already congested strategic and local road networks.
* This application this will cause further congestion on local routes.
* This application and the further congestion it will cause will encourage rat running by commuters and LGVs along the minor roads through Tiffield and other villages, especially if there are problems on the A5, A43 or M1.
* This application lacks appropriate green transport infrastructure to alleviate this congestion.
* This application fails to show that the developers will achieve a 20% modal shift away from private car trips from this new development as set out in the WNJCS.
* This application will further strengthen the cycle of car dependency, when the WNJCS para 6.7, seeks to break this cycle.

**7. Employment need and uses for the site.** We object to this application because:

* This application does not justify the need for extra employment in the area.
* This application does not conform to either the spirit or the letter of paragraph 5.70 of the WNJCS either indesirability or sustainability.
* This application takes no account of the changing economic landscape brought on by the coronavirus epidemic and resultant economic climate.
* This application serves no identifiable building need. (Particularly at this location on the edge of an urban area, with the concomitant problems of ‘piecemeal development’ described in the WNJCS para 5.10).

**8. Visual impact.** We object to this application because:

* This application will have an adverse visual impact on the area. Smaller, less intrusive, and therefore more easily screened units would be both visually and aesthetically far better suited to this site.

**9. Sustainability. Modal Shift Targets.** We object to this application because:

* This application will increase greenhouse gas production in the manufacture, construction and operation of its units, regardless of any mitigation measures proposed by the developers.
* This application will increase greenhouse gas, noxious gas and particulate production from traffic to and from the site and further exacerbate problems caused by these on our local road network, particularly through Tiffield, other villages and in Towcester which is already an Air Quality Management Area.
* This application does not offer a sufficiently large Modal Shift away from car use, especially if this development were to attract employees from a wide area.
* This application will increase the cycle of car dependency.

**10. The football pitches.** We object to this application because:

* It is unclear where the funding for commissioning the pitches will come from and monies for this may have to come not from the developers’ but from the public purse.

**11. Climate change.** We object to this application because:

* The application will contribute to climate change, contrary to SNC declaring a climate emergency in June 2019.

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**Explanation and basis for each objection.**

**1. ‘Major’ and conjoined developments.**

The West Northamptonshire Joint Core Strategy Local Plan Part 1 (WNJCS) provides the overall framework for development in the area and to which the South Northamptonshire Part 2 Local Plan (SNLP) must pay due regard. This is stated by SNC in the SNLP in para 1.1.14*:*

*‘This Plan is intended to sit alongside the WNJCS. It should, therefore, be read alongside the policies within the WNJCS.’*

As Councillor Ian McCord said about increasing the supply of new employment sites in his introduction to the SNLP: *‘We aim to meet the demand for* ***small and medium sized units*** *by suitable land allocation.’*

We want WNC to tell us how ‘small’ and ‘medium’ are defined. Also, what is meant by ‘major’ if used in this context? The planning document for this application (Main Details) describes this development as being in the Application Category *‘Major\_Major All other Largescale major Dev's’* (sic).

Why is a ‘Major’ or ‘Largescale’ development being considered at all? This category of development is not even mentioned in the SNLP,

In the market analysis for DHL by Savills (p14), they quote the South Northamptonshire Part 2 Local Plan 2011-2029 (2020) and say:

*3.2.7. The document builds on the West Northamptonshire Joint Core Strategy (WNJCS).*

They then go on (our highlighting):

*3.2.8. Paragraph 13.2.3 (page 123) states that the Bell Plantation Site represents an appropriate employment location for the provision of* ***small and medium sized*** *commercial buildings close to the town as its planned expansion takes place.*

The total proposed warehousing area for this site is more than 155,000sqm / 1,245,492sqft and the site covers 32.06 hectares or 79.22 acres in total according to the developers own figures shown in (7) later.

This development can in no way be described as ‘small’ or ‘medium’ and, indeed is described in the planning document as a ‘major’ development.

This description contravenes the letter and spirit of the South Northamptonshire Part 2 Local Plan and we therefore object to it.

In addition, the site is conjoined with the AL3, Tiffield Lane development. It would surely have been easier for the planning department to work with one, not two developers. We want to know the rationale for splitting the site in two whilst still allowing the two developers to work together to create a link road connecting the two sites as shown in their plans.

We therefore object to this application as we are concerned that splitting the site into the conjoined ‘Bell Plantation’ and Tiffield Lane developments is simply a strategy to make each of them appear to fit somehow into a lower sized category of development.

**2. Link road to the A5 from Tiffield Lane.**

A link road connecting the two sites is shown in the plans IM Properties have for Tiffield Lane (AL3) and which DHL have for the ‘Bell Plantation’ development (AL1). (This road is shown on the next page – see blue arrows).

There is no mention of a link road being built in the by IM Properties application, (though it features on their plans) nor have any traffic studies been done by them on how this link road may affect traffic flows to and from the Tiffield Lane site or through Tiffield. IM Properties told us in a meeting (November 4th.2020) that this link road would connect only to the new Towcester Town Football Club ground if it is built.

It was therefore very surprising to see in the ‘Bell Plantation’ Environmental Statement Volume III. Appendix 8.1 Part 1. Traffic Assessment, the following paragraphs:

*4.7.3: In addition, there are potential future opportunities for walking and/or cycling routes to be provided from the site to the land to the south which forms the remaining part of site allocation AL1, as well as to the land to the east which is allocated for employment generating development under Policy AL3. The routes would provide full integration between site allocations AL1 and AL3 and would improve east-west connectivity between the A5 and A43 (via Tiffield Lane) by sustainable modes of travel. The approximate location of the routes can be secured under the subject hybrid planning application, with the detailed designs of the routes to be agreed at the reserved matters stage in conjunction with adjacent developers.*

*4.8.1: From first occupation of proposed development, bus services will be able to enter and exit the site from the A5 via the proposed site access roundabout, which has been designed accordingly. In addition, there are potential future opportunities for buses to access the site from the following points:*

* *To the south, from the land which forms the remaining part of site allocation AL1 This would enable bus services to pass through the site, to and from the A5, without having to duplicate sections of the route. An unfettered road access point will be provided to the edge of the Bell Plantation Garden Centre land.*
* *To the east, from the land which is allocated for employment generating development under Policy AL3. This would enable bus services to pass through site allocations AL1 and AL3, routing between the A5 and A43, to serve a large workplace population. Access between the sites would be restricted to buses and emergency vehicles only (as well as pedestrians and cyclists) by means of a bus gate, plus an associated Traffic Regulation Order (TRO). The bus gate could be enforced by automatic number plate recognition (ANPR) cameras to prevent ‘rat running’.*

Diagram, engineering drawing

Description automatically generated

**AL3**

**AL1**

We want reassurance from developers and WNC that, if built, this link road would **never** offer an alternative access for private cars or any other vehicular traffic other than pedestrians, cyclists, buses and emergency vehicles to and from the A5 to the A43. The bus gate, TRO and ANPR cameras mentioned above must be enforced as a condition of any link road being allowed.

Until that reassurance is forthcoming from this developer, we object to this application due to the possibility of a link road being used as a ‘rat-run’.

**3.** **Link road as part of a Green Infrastructure project**

If, as it appears, the developers of the two sites are colluding about a link road then they should also jointly consider better and safer provision for cyclists and pedestrians to both sites which would include this link road. The Tiffield Lane developers propose that pedestrians and cyclists going from Towcester to Tiffield Lane take a long detour along Northampton Road to the new Hulcote roundabout and then along the lengthy access road to the site. The developers suggest pedestrian controlled lights at the new roundabout. Even if this detour is discounted and, as is presumably intended, many employees at the site and travellers to and from Tiffield sustainably walk or cycle, then this would cause congestion at the new roundabout and possible accidents.

The developers of the ‘Bell Plantation’ site say they will provide a pedestrian / cycling route down to the A5/A43 roundabout at which there would be Puffin crossings to access Towcester. (See Framework Travel Plan p25). These would cause further delay and congestion and possible accidents at this already congested roundabout, as cyclists and pedestrians try to negotiate it at busy times.

A footpath / bridleway (SB 52) already exists at the end of Tiffield Lane from the A43 over the old railway bridge onto Old Tiffield Road in Towcester. A footbridge suitable for pedestrians and cyclists at the end of Tiffield Lane would be far safer than pedestrian controlled lights on roundabouts and much more convenient than the proposed routes, particularly if the link road between the sites is built. A bridge here would also enable safe, sustainable access to the TTFC pitches for both players and spectators.

A bridge would be far safer, avoid congestion at the roundabouts and encourage much greater use of sustainable transport to access the proposed developments to and from Towcester, making the development much more environmentally sustainable.

Money saved by not having to improve pathways along the Northampton Road or the A5 and not installing pedestrian-controlled lights at roundabouts could be put towards this footbridge by the developers of both the Tiffield Lane and ‘Bell Plantation’ sites. A safe bridge crossing and a sustainable transport only link road between the two sites as described in (3) above would also offer a unique opportunity for these to become a part of a Green Infrastructure Network, enabling a green corridor pathway connecting Towcester to Northampton. This could follow the route of the disused railway line (whilst protecting the integrity of Tiffield Pocket Park) to Blisworth Marina and thence, via the Northampton Arm of the Grand Union Canal, to Northampton town centre and beyond

This initiative would be in line with WNJCS Policy S10 (j) which says that new developments should *‘Promote the creation of green infrastructure networks…*’

It also accords with SNLP Policy NE3: Green Infrastructure Corridors part 2 which states that: ‘*Development proposals which accord with the development plan will be permitted where they contribute to the delivery of green infrastructure that meets the needs of communities both within and beyond the boundaries of the district, including the establishment of new infrastructure and improvements to the quality, use and provision of existing infrastructure.’*

Furthermore, the Tiffield Lane developers own Transport Assessment, Appendix A (pdf file p. 375), dealing with the Towcester North A43 / Northampton Road, notes on page 8, para 3.1.6 that: *‘There is an existing uncontrolled bridleway crossing point across the A43 immediately to the south-west of the Tiffield Lane central reserve gap. This bridleway links Old Tiffield Lane on the south of the A43 with Tiffield Lane to the north and may present a desirable route for pedestrians and cyclists travelling between the development and the residential area on the southern side of the A43.’*

We urge WNC to make the developers take green infrastructure seriously and press the developers under Policy NE3 above for a safe and more convenient bridge crossing at the end of Tiffield Lane as a prerequisite for this application succeeding. This development provides a unique opportunity to enhance the green infrastructure network.

Without this safe bridge crossing over the A43 and a link road as described in (3) above, we object to the application on the grounds that the application as it stands:

* Does not provide safe, sustainable access to the site
* Does not enhance the green infrastructure network to and from Towcester.

**4. Traffic management to and from the site**

In the Framework Travel Plan, Transport Assessment, section 4.5 Traffic Routing Strategy the following paragraphs appear (our highlighting):

*4.5.2 In order to avoid unnecessary environmental and amenity impacts, all traffic associated with the proposed development will be* ***actively discouraged*** *from using the network of minor rural roads which surround the site to the north and east. These roads are narrow and circuitous, and pass-through sensitive locations including the villages of Duncote, Caldecote and Tiffield. The use of the A5 through Towcester Town Centre will also be* ***discouraged*** *as it forms part of an Air Quality Management Area (AQMA).*

*4.5.3 To discourage the use of these routes, all traffic associated with the proposed development be* ***required*** *to make use of the strategic and principal road networks,* ***where reasonably practical****. Once completed, vehicles will be* ***instructed*** *to use the Towcester Relief Road when travelling south on the A5, instead of routeing through Towcester Town Centre. The Relief Road is scheduled for completion in 2023, which is the same year as the anticipated opening of the proposed development.*

Again, in the Summary, p61*: In order to avoid unnecessary environmental and amenity impacts, all traffic associated with the proposed development will be* ***actively discouraged*** *from using the network of minor rural roads which surround the site to the north and east. Following completion of the Towcester Relief Road, the use of the A5 through Towcester Town Centre will also be* ***discouraged*** *as it forms part of an AQMA. A Traffic Routing Plan has been prepared for the proposed development to help identify acceptable local routes and those that should be avoided.*

There is no mention at all of how the requirement and discouragements above will be monitored or enforced. Thus, the statements above are merely intentions. Busy delivery drivers with deadlines to meet will be free to ignore this guidance and choose whichever route they feel would be most convenient, especially if there are hold-ups on either the M1, A5 or A43.

We feel, therefore, that smaller delivery vehicles especially will be effectively free to choose their own routes.

We therefore object to this application on these grounds as this development would increase traffic through Tiffield and surrounding villages, especially at peak times.

**5. The volume of worker traffic to and from the site**

There are very few bus services which can presently connect to the site, especially from any great distance. Also, as the proposed cycling and pedestrian links to the site are poor and potentially unsafe (see Link Road and Green Infrastructure) almost all workers to the site will commute unsustainably by car. The developers say in their Framework Travel Plan paragraph: 4.9.4 (our highlighting):

*The applicant is willing to commit to fund a bus journey between the site and the* ***nearest town centre,*** *whenever a threshold of 50 employees starting or finishing work within a 15-minute window is exceeded (where an existing journey is not available within 30 minutes before the start of the shift or within 30 minutes of the end of the shift), until such time as the anticipated revenue makes the journey commercially sustainable.*

This intention, though laudable, is hedged about by caveats. Despite the intentions also set out in the same document, paragraph 2.4.7 where:

*The applicant will appoint a Framework Travel Plan Coordinator (FTPC) for the site at least six months prior to first occupation of the proposed development. This is to ensure that sustainable travel is promoted during the early stages of the development.*

We feel that the uptake of bus or other sustainable travel, without a financial or other incentive would be minimal, especially as the cycling and pedestrian routes, as proposed, are potentially unsafe and inconvenient. Furthermore, many of the workers on site will not be based in Towcester in any case, as the developers themselves admit below in their Environmental Statement Chapter 7, Socio-Economics, paragraph 7.7.7:

*The magnitude of employment generated by the Development is considered to be high, as the Development is expected to generate additional employment ranging between 1,371 and 1,387 jobs which makes up 65-66% of unemployed people in SNC. It is however unlikely that this share of unemployed people would be skilled, willing or able to work in logistics and industrial activities. The sensitivity of people in the study area who could benefit from employment opportunities is medium.*

In plain words, most workers will commute from outside the immediate area into and from the site. Potentially therefore, there will be some 2,700 worker movements /day into and from the site. A significant proportion of these could access the site through Tiffield and other villages, especially if there are hold-ups on either the M1, A5 or A43.

We therefore object to this application on these grounds.

**6. Projected delivery vehicle movements**

As the WNJCS states in para 6.11 *‘The transport evidence base shows that there are significant parts of the road network, especially around the four towns of Northampton, Daventry, Towcester and Brackley which cannot cope with the expected number of trips as a result of traffic growth from the existing residents, or new development, if travel behaviour does not alter.*’

As shown earlier, there is little or no prospect of a significant number of workers accessing this site (and others) in a sustainable manner. In addition, there are the projected delivery vehicle movements into and from the site. The figures below are taken from the Noise Impact Assessment (Survey), Schedule 20/0441/SCH2 Traffic Movements, p 2 of the Appendix. To quote (our highlighting):

*The traffic data* [in the table below] *shows the total number of* ***two way*** *vehicle movements used in the assessment. This has been taken from the Arrival and Departure data provided by the traffic consultant.* (The figures below in bold are our calculations).

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Period | Units 1-3 | | Unit 4 | | Unit 5 | | **Two way movements per hour** | **Two way movements per min** |
| HGVs | LGVs | HGVs | LGVs | HGVs | LGVs |
| 0000-0100 | 4 | 33 | 0 | 0 | 0 | 0 | **37** | **0.62** |
| 0100-0200 | 4 | 23 | 0 | 0 | 0 | 0 | **27** | **0.45** |
| 0200-0300 | 5 | 25 | 0 | 0 | 0 | 0 | **30** | **0.50** |
| 0300-0400 | 5 | 30 | 0 | 0 | 0 | 0 | **35** | **0.58** |
| 0400-0500 | 6 | 44 | 0 | 0 | 0 | 0 | **50** | **0.83** |
| 0500-0600 | 10 | 100 | 0 | 0 | 0 | 0 | **110** | **1.83** |
| 0600-0700 | 11 | 104 | 0 | 3 | 0 | 0 | **118** | **1.97** |
| 0700-0800 | 13 | 107 | 1 | 13 | 1 | 4 | **139** | **2.32** |
| 0800-0900 | 14 | 99 | 2 | 19 | 1 | 4 | **139** | **2.32** |
| 0900-1000 | 15 | 64 | 2 | 17 | 1 | 12 | **111** | **1.85** |
| 1000-1100 | 16 | 48 | 2 | 17 | 0 | 3 | **86** | **1.43** |
| 1100-1200 | 17 | 44 | 2 | 19 | 1 | 6 | **89** | **1.48** |
| 1200-1300 | 16 | 49 | 2 | 18 | 0 | 5 | **90** | **1.50** |
| 1300-1400 | 16 | 78 | 1 | 16 | 0 | 5 | **116** | **1.93** |
| 1400-1500 | 15 | 98 | 2 | 17 | 0 | 13 | **145** | **2.42** |
| 1500-1600 | 14 | 82 | 1 | 15 | 0 | 15 | **127** | **2.12** |
| 1600-1700 | 13 | 74 | 1 | 18 | 1 | 13 | **120** | **2.00** |
| 1700-1800 | 12 | 80 | 1 | 16 | 0 | 22 | **131** | **2.18** |
| 1800-1900 | 10 | 54 | 0 | 6 | 0 | 42 | **112** | **1.87** |
| 1900-2000 | 10 | 31 | 0 | 5 | 0 | 58 | **104** | **1.73** |
| 2000-2100 | 7 | 29 | 0 | 1 | 0 | 56 | **93** | **1.55** |
| 2100-2200 | 7 | 51 | 0 | 1 | 0 | 29 | **88** | **1.47** |
| 2200-2300 | 7 | 63 | 0 | 1 | 0 | 11 | **82** | **1.37** |
| 2300-2400 | 6 | 50 | 0 | 1 | 0 | 3 | **60** | **1.00** |
| **Totals** | **253** | **1460** | **17** | **203** | **5** | **301** | **2239** |  |
|  |  | **Average movements per hour** | | | | | **93.29** |  |
|  |  | **Average movements per minute** | | | | | | **1.55** |

A peak movement of almost 2.5 vehicles per minute is bad enough, but if **two way** movement means each figure above represents a movement into **and** a movement out of the site, then the figures in bold can be doubled, meaning movements of almost **five vehicles per minute** at peak times.

More worryingly, in the Environmental Statement Vol 1, Chapter 8, paragraph 8.7.4, the following figures are quoted:

|  |  |  |
| --- | --- | --- |
| *Table 8.16: Summary of Development Traffic Generation (Operational Phase) Annual Average Daily Traffic Generation (24 Hour Arrivals and Departures)* | | |
| *Light Vehicles* | *Heavy Vehicles* | *Total Vehicles* |
| *3465* | *467* | *3932* |

These are explained by the developers as follows:

*8.7.5 The vehicle trip distribution associated the Development has been estimated using a combination of journey to work data from the 2011 Census, home postcode data provided by Towcester Town Football Club for members, and* ***existing*** *HGV volumes on the local highway network as identified from the Department for Transport (DfT) Road Traffic Statistics website (https://www.gov.uk/government/collections/road-traffic-statistics). Full details of the methodology are provided within the Transport Assessment (Appendix 8.1).*

The figure of given 3,932 could be two way movements (7,864 movements in and out of the site) and is almost 57% higher than the 2,239 movements we calculated from the previous table. We urge WNC to make the developers clarify these figures.

Taking together worker movements, HGV and LGV movements at this site plus:

* additional journeys generated by the Tiffield Lane site,
* additional journeys generated by the Woolgrowers site
* additional journeys generated by Podium Park and other developments at Silverstone
* additional journeys generated by the many large new developments along the local M1 corridor
* all the movements associated with the projected new housing around Towcester and elsewhere

… we feel that the major roads in the area will be heading for gridlock.

Apart from in the Environmental Statement, Volume III, Appendix 3.4 – Cumulative Schemes which lists some other developments, we would also ask what work has been done, by whom and where it appears (we could not find it in the Transport Assessment), to predict the likely effects that the *combination* of local and regional developments will have on the already overstrained and congested local and strategic road network?

Policy C2 in the WNJCS states that *‘New development in the four towns of Northampton, Daventry, Towcester and Brackley and primary service villages will be expected to achieve the modal shift targets (in paragraph 6.13) by maximising travel choice from non-car modes*’.

We do not see this proposed application addressing this policy in **any** way.

The WNJCS para 6.13 states that: *‘This Plan is based on the Modal Shift Targets initially set out in Northamptonshire County Council's Transport Strategy for Growth… These are: a 5% Modal Shift away from Private Car Trips across existing developments and a 20% shift away from Private Car Trips from all new development. Our analysis shows that it may be possible to achieve more. These targets are, therefore, viewed as minima in this Plan, and all travel interventions should be designed to achieve the highest modal shift possible, with some new developments, particularly the Sustainable Urban Extensions, aspiring to achieve a modal split of no more than 40% of trips being made by car*.’

There is no evidence that the developers have produced that these targets will be come anywhere near to being met. This is because of the:

* Lack of effective oversight of the combined effect this and other proposed developments will have on the already congested strategic and local road networks
* The certainty that this will cause further congestion
* The likelihood that this will encourage rat running by commuters and LGVs along the minor roads through Tiffield and other villages especially if there are problems on the A5, A43 or M1.
* The lack of appropriate green transport infrastructure to alleviate this
* The failure of the developers to show that they will achieve a 20% shift away from private car trips from this new development as set out in the WNJCS
* The further strengthening of the cycle of car dependency, when the WNJCS para 6.7, seeks to break this cycle

We object to this application on these grounds.

**7. Employment need and uses for the site.**

This development will be situated in an area of already high employment. Given this, we wish to know what exercise has been undertaken either by the developers or by SNC to show the need for another 1,300 or so jobs in the Towcester area and also how these tally with the following telling statement in the SNLP para 13.2.1:

*‘Although there is* ***no specific identified need for additional employment to meet the needs of the town*** *(based on the housing and employment requirements set out in the WNJCS) it is considered to be important to facilitate some additional* ***small scale*** *employment opportunities to provide additional choice and opportunity for the growing population and to look to reduce out-commuting.’*

As there are many other warehousing developments being proposed in the local area, as outlined earlier, not least at Tiffield Lane How is this development increasing the choice of employment opportunity and how can it be seen to be ‘small scale’?

How, given this background, is this extra development at ‘Bell Plantation’ justified?

The WNJCS, para 5.70, states: *‘The area remains attractive to the warehouse industry and indications are that it is likely to remain so for the lifetime of the Plan. However, delivering new space to cater for the warehousing sector on a trend-based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy.’*

It then goes on to say in para 5.71:

*‘West Northamptonshire already has a large supply of warehouse development with planning consent in the pipeline including Swan Valley, Bedford Road (Former Cattle Market), and DIRFT. The majority of any new warehousing will be accommodated on existing employment sites through the employment land supply pipeline and churn of employment land. The allocation of a strategic employment site at Northampton M1 Junction 16 provides further support for demand in this sector in a sustainable manner consistent with the economic strategy within the Plan as a whole. New large warehousing developments (in excess of 40,000 sqm) will normally be expected to be provided for at DIRFT.’*

Since this was written, several more warehousing sites in the local area have come on stream and several more are proposed in the West Northamptonshire Strategic Plan.

According to the drawing in Appendix A of the Transport Assessment (found in Environmental Statement Vol III, Part 1) the area of the site is 32.06 hectares or 79.22 acres. According to the drawing in Appendix C of the Transport Assessment, the total proposed warehousing floorspace for this site is more than 155,000sqm or 1,245,492sqft:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Zones | Minimum to maximum number of buildings | Maximum amount of floorspace [GIA] | Height  (m) | Use Class |
| Zone 1 | 1 | 24,572sqm/ 264,494sqft | 18.5 | B8 |
| Zone 2 | 1-3 | 40,000sqm/ 430,560sqft | 24.5 | B8 |
| Zone 3 | 1-5 | 47,137sqm/ 507,383sqft | 21.5-24.5 | B8 |
| Zone 4 | 1-6 | 4,000sqm/ 43,056sqft | 15.5 | B2/B8 |
| Zone 5 | Towcester Town Football Club [6Ha] No Employment Development | | | |
| TOTAL | 4-18\* | 115,709sqm / 1,245,492sqft |  |  |

\*Error. This figure should read 15.

The SNLP Policy AL3 states under ‘*3. Land uses: employment’* that the site will have *‘a. An independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.’*

This analysis was undertaken by Savills on behalf of DHL (Land at Bell Plantation, Towcester Market Analysis. Logistics, Industrial and Business Premises). We contend that the analysis is based on flawed assumptions. As they say on p3 (their highlighting):

*The Local PMA’s [Property Market Areas} inventory also has a concentration of larger premises (greater than 100,000 sqft) which comprise about 65% of total industrial floorspace (B2/B8).* ***The majority of the existing larger premises accommodation (about 68% by floorspace) is of average or below-average quality****. There is a* ***limited amount of higher grade larger premises that have been delivered in recent years, especially in the B8 Use Class****. There is currently only about 1.8m sqft of available above-average quality, large premises (greater than 100,000 sqft). This is* ***just 2% of overall inventory*** *and represents* ***less than a year of take-up in this size category****. This indicates that there is an* ***acute shortage of available premises*** *in this (100,000 sqft plus B2/B8) segment of the industrial market.*

The rest of their analysis is based on this without taking fully into account other proposed development areas locally and without considering that existing premises, which they say are of ‘average’ or ‘below average’ quality (however that is quantified), might be extended, refurbished or rebuilt to meet the need for 100,000+sqft premises. Their future forecasts of the need up to 2035 for more and more of these premises is also hedged about by unstated assumptions and uncertainties. We therefore feel that:

* Does not justify the need for extra employment in the area
* Does not conform to either the spirit or the letter of paragraph 5.70 of the WNJCS either indesirability or sustainability
* Takes no account of the changing economic landscape brought on by the coronavirus epidemic and resultant economic climate
* Serves no identifiable building need. (Particularly at this location on the edge of an urban area, with the concomitant problems of ‘piecemeal development’ described in the WNJCS para 5.10).

**8. Visual impact**

This development replaces a visually pleasing agricultural greenfield site with buildings of major visual impact the first of which on Plot 1 will be 18.5 metres high, followed by others 24.5m high. The south-west corner of the site will also be raised by 7m so the warehouse at that end will be 31.5m high with all units having huge footprints.

For comparison, Panattoni Park on the M1 has a maximum height of 18m and Tritax at Banbury on the M40 has a 15m maximum height. In Towcester the Screwfix premises are 9.5m high and 27,500sqft. These should be the limits for this rural location close to an historic market town.

The Environmental Statement Volume II Part 1, Landscape and Visual Impact Assessment para 10.1 lists Minor-Major adverse landscape effects for Caldecote (LLC8), Towcester (LLCA1), Tove Undulating Arable (LLCA6) and on the Site. In addition, the development will have a brutal visual impact on all passers-by on the A5 and on the public right of way running through the site and the Grafton Way.

In paragraph 13.3.5 of this document they say: *‘However, the landscape and visual receptors will experience this effect gradually through the construction phase. These effects are also considered a long-term temporary effect for the first 15 years until planting becomes established. The nature and scale of the effect interaction between these effects would also vary depending on the location of the receptor (i.e. person) and mode of the receptor (e.g. car driver or pedestrian)’*. Temporary, 15 years!

However, the photographs in the Environmental Statement Volume II Part 3, Landscape and Visual Impact Assessment show the development being visible from as far away as Towcester Racecourse but particularly so from Caldecote and Duncote. Even after trees planted to screen the site have grown to the proposed height of 10m after 15 years. That, to us, signifies a permanent effect.

Despite being veiled by screening, this will be inadequate to hide the structures. The prospect of having yet another large warehouse development will visually blight the area. We feel that WNC should resist large warehouse structures (of already very questionable necessity) being put on this site.

Smaller, less intrusive, and therefore more easily screened units would be both visually and aesthetically far better suited to this site.

We therefore object to this development as it will have an adverse visual impact on the area.

**9. Sustainability. Modal Shift Targets.**

How, in this present climate, (pun intended) is this development in ***any*** way sustainable?

The development will increase greenhouse gas emissions in the manufacture of materials for its construction, in its construction phase, in its operation and from the additional delivery traffic and commuting to and from the site.

It is certain that this site will generate more commuter journeys by car from outside the local area and so further strengthen the cycle of car dependency. Increased commuter, HGV and LGV traffic will also mean more diesel particulates, more greenhouse gases (carbon dioxide and nitrous oxides) and other noxious gases being produced. These are already a severe and life-threatening problem, particularly along Watling Street in Towcester. This development, and others like it will only serve to exacerbate this problem.

To summarise here, the ‘Bell Plantation’ application (and, by implication, the other proposed developments on the A5 and A43) is therefore unsustainable as this application (and others):

* Will increase greenhouse gas production in their manufacture, construction and operation despite mitigation measures proposed by the developers
* Will increase greenhouse gas, noxious gas and particulate production from traffic to and from the site and further exacerbate problems caused by these on our local road network, particularly through Tiffield, other villages and in Towcester
* Does not offer a sufficiently large Modal Shift away from car use, especially if this development were to attract employees from a wide area
* Will increase the cycle of car dependency

We therefore object to this application on the grounds listed above.

**10. The football pitches**

It is our understanding that the developers intend merely to prepare a levelled stretch of land for football pitches. There is no provision for a clubhouse, parking, drainage or any other amenities. We are unsure that Towcester Town Football Club will have the financial means to provide these.

As it is unclear where the funding for this will come from, we object to the application as monies for the pitches may have to come not from the developers but from the public purse.

**11. Climate change.**

How can this development be reconciled in any way with SNC declaring a climate emergency in June 2019 and declaring that it would investigate action that could help limit climate change?

Despite all the measures which the developers say that they will take to limit the environmental impact of the development in their Sustainability Statement, the bald fact remains that if it is built, this site will not be carbon neutral or negative. This site will instead help contribute to climate change, not prevent it. In their Environmental Impact Assessment Scoping Report, Chapter 12, tellingly entitled *‘Non-Significant Topics’*, the developers blithely dismiss this, saying in para 12.53 that *‘any GHG* [greenhouse gas] *emissions are unlikely to be ‘significant’ in the context of the UK’s carbon budget and it is therefore proposed that climate change be scoped out of the EIA*’. They also dismiss noise and vibration (para 12.24), flood risk and damage (para 12.31) and light pollution (para 12.64) despite the latter not yet having a lighting plan when this was written.

The deleterious effect that building and operating this one site will have on the present climate emergency may be small, relative to the total regional, national, and global effects of further development. However, continuing to grant permissions for this and similar sites only serves to incrementally increase the future effect of climate change and blight our environment.

This development and others like it are being proposed in the full knowledge that allowing them to be constructed and to operate will speed up the onset of climate change.

We argue that this is too high a price to pay, particularly when the very need for this and similar sites is in question and our other grounds for objection are considered.

We therefore object to this application on the grounds that it will contribute to climate change, contrary to SNC declaring a climate emergency in June 2019.

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We do not feel that the developers have shown that the residents of Tiffield will not be adversely affected by this application. Therefore, we feel we must object to the application on all the grounds above.

**We look forward to you addressing the concerns we have stated in this letter. We also look forward to the planners and / or the developers giving us full and reasoned arguments clearly stating why any of the objections set out here are without substance or validity.**

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**Final comments.**

We find it difficult to believe that the members of the Strategic Planning Committee or indeed the Planning Department at WNC, hard-working as they might be, can ever find the time to fully digest all the documents contained in applications such as this. The sheer volume of information, much of which is repetitious or couched in jargon, seems almost deliberately intended to overwhelm the reader. The documents are also always couched in terms favourable to the developer, even in documents from so-called ‘independent’ experts, with matters which are of concern to local residents buried in the verbiage.

Consequently, the vast majority of laymen – your electorate (!) feel effectively excluded from giving applications such as this the attention they deserve and even those who do take an interest soon seem to think dispiritingly that ‘it’s a done deal’.

As a result, we are seeing our once-beautiful landscape being increasingly covered by impersonal, ugly tin sheds of no merit other than to serve a supposed need for ‘next-day’ deliveries which are impoverishing our high streets and towns both economically and environmentally.

Do you *want* this to be your legacy?

There is a rising tide of discontent locally about this and other similar applications in the area. We urge you to truly listen to the concerns of the people you serve. They are increasingly worried about environmental issues in general and applications like these in particular. They have a voice. They are not nimbys – they simply want development appropriate to the area in which they live. Again, please listen!

Yours sincerely,

John Beasley

Chairman. On behalf of Tiffield Parish Council.