

Land to the South of A14/A5199 Junction, Cold Ashby

Planning Statement

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1. Introduction

1.1 This Planning Statement has been prepared by Nexus Planning on behalf of Monte Blackburn Ltd ('the applicant') to support an outline planning application on land to the south of A14/A5199, in Cold Ashby. An outline planning application with full details of access, excluding appearance, landscaping, scale and layout, is submitted to West Northamptonshire Council ('the Council').

1.2 The description of the application is:

'Outline planning application with all matters reserved except means of access, for the development of three Use Class B8 units.'

Overview

1.3 The site comprises 9 hectares of land, in the open countryside near the settlement of Cold Ashby, Northampton. The site was a former quarry and the northern element of the site (as shown on the enclosed indicative layout) benefits from extant consent for a roadside services scheme, comprising a petrol filling station, three drive-thru units and associated parking for cars and larger vehicles.

1.4 This proposal relates to the provision of three large commercial units, situated to the south of the already consented roadside services scheme. The units will range from 50,000 sq.ft to 178,500 sq.ft, and will be suited to be accommodated by major logistics businesses. It is likely that the buildings would appeal to local, regional and national occupiers looking for quick access to a large part of the UK population and benefit from the local workforce.

1.5 The site is situated to the south of the A14, a key arterial route which joins the M1 and M6 to the west. It is in a prime location, being in proximity to a busy junction of the M1 and M6, and therefore an optimal site for the construction of three large Class B8 commercial warehouses.

1.6 An EIA Screening Opinion was received from the Council on 9 May 2022 in response to the applicant's Screening Request, which confirmed that the development proposed is not EIA development. The Opinion notes that the characteristics of the particular development are not such so as to give rise to significant environmental impacts that would justify the need for an EIA. The proposed warehouse use would not result in significant levels of emissions or pollutants given the nature of such a use. However, the Opinion states that the visual impact, highways impact and impact on heritage assets in the area will need to be considered carefully.

1.7 The application proposals have been the subject of pre-application discussions with the Council through a formal pre-application request and meeting held in April 2021. Full details of the pre-application discussions and feedback from the Council are provided at Section 3.

1.8 The proposal will bring significant benefits that will fulfil the social, economic and environmental strands to sustainable development as set out in the National Planning Policy Framework (NPPF) and the local development plan, both of which are material to the determination of this application.

1.9 The scheme is in response to an occupier requirement for floorspace in this location, and the applicant is currently in discussions with a food retailer to occupy floorspace at the application site.

1.10 The key benefits of the proposal can be summarised as follows:

- The ability to provide a market leading storage and distribution development, which will provide a significant positive impact upon the local economy;
- Meeting an identified lack of choice and opportunity to accommodate the type and scale of large-scale distribution and logistics uses in commercially attractive locations within the local area, and in particular in an accessible location in proximity to the M1 and M6;
- The proposed development has the potential to deliver a substantial level of new jobs in the local area and a substantial local input into the economy per annum;
- The provision of a range of job opportunities for residents of the surrounding towns and further afield. This will include full-time jobs, from entry level through to skilled technical and managerial roles, both during the construction and operational phases; and
- The proposed development will provide a significant flagship employment land investment in the surrounding area, providing a sub-regional distribution hub, and establishing the area as an important and vital distribution location.

Submission Information

1.11 The proposals are supported by the following documents and plans:

Document / Plan	Reference	Author
Application Form and Ownership Certificates	N/A	Nexus Planning
Arboricultural Impact Assessment (including Tree Survey)	UG13371	Urban Green
Design and Access Statement		Campbell Driver Partnership
Drainage Strategy	P15584	Goodisons
Drainage Plan	P15584	
Flood Risk Assessment	NS_0124_55_V1.0	Nicola Sugg
Historic Environment Desk-Based Assessment	3771/01	Lanpro Services Ltd
Impermeable Areas Plan	P15584-501	Goodisons
Landscape and Visual Appraisal	UG1337	Urban Green
Noise Impact Assessment	ARR/C/3311.02	ADC Acoustics
Phase 1 Desktop Study	4334-ROC-ZZ-XX-RP-ES-PH1DTS	ROC Consulting
Transport Assessment and Framework Travel Plan	VN212105	Vectos
Plans		
Site Location Plan	16.158.009C	Campbell Driver Partnership
Parameter Plan	16.158.030B	Campbell Driver Partnership
Indicative Proposed Site Layout	16.158.001Y	Campbell Driver Partnership

2. Site and Surroundings

The Application Site

- 2.1 The site is triangular in shape and measures approximately 9 ha, situated to the south of the A14 and west of the A5199 Welford Road.
- 2.2 The site to the north has planning consent for roadside services. It was allocated in the UDP for provision of a roadside service station. Multiple planning permissions approved over the last two decades have refined this consent and the site currently benefits from consent for a proposal incorporating a petrol filling station; HGV parking; and coffee drive-thru. A hotel or a drive-thru fast food restaurant could be provided on the site.
- 2.3 The site is a former quarry and a rectangular area in the north-east of the site was the Portly Ford Refuse Tip. A bridleway extends around the eastern and southern border of the former tip to bisect the site, leading to Cold Ashby.
- 2.4 The levels of the site are varied and generally falling from south to the north-west. Quarrying and landfill operations have significantly altered the site's topography, and there are level changes across the site comprising spoil heaps, landfill and open quarries. There is a large pit approximately 6m in depth in the southern area of the site, which holds water at the deepest section. A pond also lies in the southern tip of the site. The central eastern part of the study site occupies an elevated plateau on the site of a former landfill tip lying 1-2m above existing ground levels.
- 2.5 There are some scattered trees on the site. The majority of these trees are located along the western border of the site, along the middle extent of the site, and at the western corner.
- 2.6 The site's surroundings can be described as follows:
 - **To the north:** An area of land with planning consent for roadside services lies to the north. Beyond this is the A14, and further to the west, the village of Welford. Beyond the A14 is the Welford Truckstop.
 - **To the east:** The site is bound by the A5199 Welford Road. Beyond this lies agricultural fields and Naseby Reservoir.
 - **To the south:** The A5199 Welford Road lies to the south-west, and to the south lie agricultural fields. The village of Cold Ashby and Thorny are to the south.
 - **To the west:** A tree belt which is thicker at the north separates the site from agricultural fields.
- 2.7 The site is situated approximately 2.5km to the south of Welford and 10.4km to the south west of Market Harborough. As stated above, the A14 is a key arterial route which joins the M6 and M1 to the west and runs to Kettering to the east. The site is located approximately 10km to the east of the junction where the M1 meets the M6.
- 2.8 The A14 is a major trunk corridor linking the East Coast Ports with Junction 1 of the M6 and M1 Motorway at Junction 19. The site sits in close proximity to the logistics 'Golden Triangle' (the M69, M1 and M6) which is widely recognised as the most important logistics location within the UK.
- 2.9 In land ownership terms, the site is in single ownership and is available and ready to be developed. There are no known constraints relating to ownership that would otherwise preclude the development of this site as proposed

Planning History

Roadside Services

- 2.10 To the immediate north, an area of land gained planning permission in March 1998 for the provision of roadside facilities, highway works and landscaping (ref. DA/1997/1074). The permission was partially implemented.
- 2.11 A non-material amendment (NMA) ref. DA/2017/0498 was subsequently issued on 31 March 2017, which amended the wording of Condition 1 detailed in the Decision Notice to list all of the plans.
- 2.12 In October 2017, a NMA for the variation of Condition 1 as amended by NMA/2017/0035 was approved to allow revisions to the approved layout in respect of design, siting and appearance of the proposed coffee drive-thru, fast food drive-thru, petrol filling station, hotel car parking, HGV parking, landscaping and layout (ref. DA/2017/0498).
- 2.13 In October 2018, a separate full application for the construction of a hot food drive through building with associated parking and landscaping was approved (ref. DA/2018/0535). The drive-thru building was to replace the previously approved hotel. On the 3rd December 2019, an application to vary Condition 1 of the hot food drive thru was approved to allow for changes in the design and appearance of building and increased landscaping (ref. DA/2019/0770).
- 2.14 A further NMA (ref. NMA/2019/0003) was then approved in February 2019 to amend DA/2017/0498, to amend the plans listed to allow revisions to the design, siting and appearance of the proposed coffee drive thru, petrol filling station, hotel, parking and landscaping. Changes were approved to the internal road layout between the hotel and HGV area to separate them.
- 2.15 In 2022, a Non-Material Amendment (application reference WNDNMA/2022/0026) was submitted to vary the original permission for roadside services (DA/1997/1074), through the latest NMA approved (application reference DA/2017/0498), which contains the hotel. This was to make some minor changes to the approved layout and shifting the roundabout to the west.

3. Pre-Application Discussions

Formal Pre-Application Request

- 3.1 A pre-application request was submitted to the Council on the 2nd June 2021, for the creation of three new Class B2/B8 storage and distribution units totalling 342,500 sq.ft accessed from the same approved road infrastructure serving that site.
- 3.2 A meeting was held on 11 August 2021 to discuss the proposal, principle of development, the key technical considerations, and to agree the information required to support any future planning application.
- 3.3 A summary of the key elements from the pre-application response is provided below, along with our initial considerations against each key topic.

Planning Policy

- 3.4 It was noted that the proposal would conflict with Policy RA6 employment policy in the adopted development plan, which seeks to direct employment development to the main urban areas of Northampton, Daventry and more limited development being directed towards Primary Service Villages with existing employment centres.
- 3.5 Policy RA6 is relevant to the proposal as it is located in the Open Countryside. The closest defined settlement is Cold Ashby, an 'Other Village'. Criterion 9 of this policy states that economic development will be supported where it accords with Policy EC4 of the Local Plan Part 2 or Policy R2 of the WNJCS.
- 3.6 Policy R2 sets out the approach to the rural economy, it makes reference to proposals that sustain and enhance the rural economy by creating or safeguarding jobs and businesses will be supported where they are of an appropriate scale for their location, respect the environmental quality and character of the rural area and protect the best and most versatile agricultural land. It also sets out which types of development would be acceptable. The proposal, which is not the expansion of an existing business and is not considered small-scale, does not meet any of the criteria in Policy R2.
- 3.7 Policy EC4 of the Local Plan Part 2 defines appropriate uses within Strategic Employment Areas.
- 3.8 It was the Policy Officer's opinion that as the proposal is not well-related to an existing Strategic Employment Area it was in conflict with this policy. The proposal would not be able to support the role and function of an existing Strategic Employment Area given it is geographically some distance from the nearest SEA's at Crick and Brixworth.
- 3.9 Policy E1 of the WNJCS identifies that new commercial floorspace at other smaller settlements will be of a scale that is commensurate with their function. The proposal is not well related to any existing village and therefore does not meet the requirements of Policy E1.
- 3.10 The remainder of this Planning Statement will demonstrate that although the proposal is partly in conflict with Policy EC4 of the Daventry Local Plan Part 2, there are a range of significant material benefits associated with the proposal which outweigh any conflict with policy. A full review against planning policy is provided below.

Highways

- 3.11 A robust Transport Assessment should be submitted to demonstrate what impact the additional development would have on local highways, taking into account the existing arrangements proposed under the s278 agreement which is being finalised for the roadside services at the north.
- 3.12 It was noted that the A5199 Welford Road is unsuitable to carry significant numbers of HGVs.
- 3.13 The application is supported by a detailed Transport Assessment ('TA') produced by Vectos, which explores the relationship between the proposed development and surrounding transport networks. A summary of the findings of the TA are provided later in this Statement, which demonstrates overall that the proposals can be accommodated on the surrounding highway network and will not lead to any highway safety issues in the surrounding area.

Drainage

- 3.14 The scheme will need to demonstrate that surface water drainage can be accommodated on site without undue impact beyond the site in terms of increasing flood risk elsewhere.
- 3.15 A surface water drainage scheme has been submitted to support the proposal. The details indicate that the proposed development will have separate foul and surface water drainage systems, which will discharge to the existing watercourse to the west of the site. Further detail in respect of drainage and flood risk is provided later in the Statement and set out in detail in the accompanying technical application reports.

Environmental Health

- 3.16 A noise impact survey would be required to be undertaken to assess the impact of the proposed development on nearby sensitive receptors. Lighting impact should also be considered.
- 3.17 A Noise Impact Survey has been provided to respond directly to the comments raised at pre-application stage and to provide sufficient evidence to demonstrate that the impact of the proposal overall should be negligible at all times.

Ecology

- 3.18 The northern part of the site is identified as a Potential Wildlife Site. Appropriate ecology surveys would need to be completed including an assessment of whether the site is Open Mosaic Habitat. Net biodiversity gain should be demonstrated using the latest Defra calculator.
- 3.19 An Extended Phase 1 Habitat Survey has been produced by Rachel Hacking Ecology which assesses the habitats on the site for their potential to support protected species, including badger activity, waterbodies for their potential to support Great Crested Newts, bat roosting and so on. The site was also surveyed for invasive and non-native plant species.

Contamination

- 3.20 The pre-application response notes that the site's previous history as a landfill site (covering part of the site) will need to be investigated.

- 3.21 A Phase 1 Desktop Study has been prepared by ROC Consulting. The purpose of the desk-based study is to provide a preliminary assessment of the site relating to current and historic operations to establish baseline geo-environmental and geotechnical conditions. The report presents a factual account and highlights the more pertinent points with interpretation relating to potential sources of soil or groundwater contamination that may be present within site soils.
- 3.22 The information obtained during the assessment has also been used to collate a Preliminary Conceptual Site model for the proposed development to assist with the estimation of risks arising from contaminated land related concerns. Where required, the model will also form the basis for future Phase 2 Intrusive Site Investigation works to further refine (and mitigate against) risks posed to future site users.

Landscape and Visual Impact

- 3.23 An assessment of the buildings visual impact would be required, having regard to any relevant constraints including the special landscape area and any other constraints.
- 3.24 A Landscape and Visual Impact Assessment ('LVIA') has been submitted with the application, prepared by Urban Green. The LVIA provides an appraisal of the proposed development and to identify the key landscape and visual sensitivities of the application site and provide recommendations to support the appropriated development of the site.

EIA Screening

- 3.25 An EIA Screening Opinion was received from the Council on 9 May 2022 in response to the applicant's Screening Request, which confirmed that the development proposed is not EIA development. The description of development provided was: **'outline planning application with all matters reserved except means of access, for development of three no. Class B8 units comprising 31,819sq.m'**.
- 3.26 Although the description of development has changed slightly, to avoid reference to three units meeting the floorspace requirement for flexibility, the development is the same in terms of the amount of floorspace which could come forward. Therefore, the Screening Opinion remains of relevance to the proposal.
- 3.27 The Opinion notes that the characteristics of the particular development are not such so as to give rise to significant environmental impacts that would justify the need for an EIA. The proposed warehouse use would not result in significant levels of emissions or pollutants given the nature of such a use. However, the Opinion states that the visual impact, highways impact and impact on heritage assets in the area will need to be considered carefully.

4. The Proposed Development

- 4.1 The application seeks outline approval for the development of three Class B8 units, with associated access, internal infrastructure and substantial landscape proposals. As the application is applied for with details of appearance, layout, scale and landscaping reserved for future consideration, a Parameter Plan is submitted to identify the developable area. It is expected that the approval will be conditioned by the Parameter Plan and Location Plan.
- 4.2 This development represents an opportunity to create a high quality sustainable development to suit the needs of future occupiers and meet market demand. The proposed development will make efficient and effective use of an otherwise previously developed site.
- 4.3 An Indicative Masterplan is submitted to provide an example of how the site could be developed to accommodate the quantum of floorspace, over three units. An appropriate level of parking will be provided adjacent to each of the three units, with safe vehicular access provided throughout the site. Extensive landscaping will be provided to ensure any potential visual impacts are appropriately mitigated.
- 4.4 In designing the indicative scheme, the following key design principles have been adopted:
- Arranging the buildings to reduce their visual impact on the surrounding countryside;
 - The inclusion of a significant hedgerow planting to A1599 and the perimeter of the site to encourage bio diversity;
 - The provision of reinforcement hedgerow planting to the public right of way across the site;
 - No access from the A5199; and
 - The provision of proposed building heights which are varied to suit the mass of the buildings.
- 4.5 Vehicular access into the site is from the approved access road taken from a newly constructed roundabout into the northern site. This access road is to be extended into the south site to serve the new buildings. No access is proposed from the A5199.
- 4.6 Inclusive access throughout the site will be provided with 10 % accessible parking spaces located near the building entrances, 10% electric vehicle charging point provision and level thresholds into the buildings.
- 4.7 The development aims to achieve a BREEAM rating of very good and an initial BREEAM assessment of the design proposals will be submitted as part of the detailed application. The building will be designed in accordance with the building regulation, approved document L2 and achieve the U-values therein for thermal performance of external elements forming the building fabric. An emphasis will be placed on air tightness design and minimising cold bridges to ensure efficiency of the thermal envelope.

5. Planning Policy

- 5.1 This section of the Statement summarises the national and local policy context relevant to the Proposed Development.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act requires all planning applications to be determined in accordance with the development plan unless there are material considerations that indicate otherwise.
- 5.3 The adopted Development Plan for the area comprises the Joint Core Strategy (Local Plan Part 1) for West Northamptonshire (adopted December 2014), Daventry's Settlements and Countryside (Local Plan Part 2) adopted in February 2020, and the Saved policies of the Daventry Local Plan 1997.
- 5.4 The National Planning Policy Framework (July 2021) is a material consideration to the proposal.

Site Allocations and Designations

- 5.5 The site is located within the Open Countryside on the Interactive Policies Map, which Policy S1 'Daventry District Spatial Strategy' of the Local Plan Part 2 states will be protected.
- 5.6 Policy S1 guides sustainable development and seeks to ensure that a sustainable pattern of development is guided across the authority area. In particular, the policy seeks to promote a vibrant economy and enhance a network of employment areas across the authority area.

Adopted Planning Policy

West Northamptonshire Joint Core Strategy (adopted December 2014)

- 5.7 The Core Strategy was adopted on 14 December 2014. It has been reviewed against the NPPF (February 2019). The majority of policies are up to date and consistent with the NPPF yet some should be updated (highlighted below).
- 5.8 Policy SA of the Joint Core Strategy ('WNJCS' or 'Core Strategy') is the presumption in favour of sustainable development and should be superseded by Paragraph 11 of the NPPF.
- 5.9 Policy S1 sets the spatial distribution of development which will be concentrated primarily in and adjoining the principal urban area of Northampton. New development in the rural areas will be limited with the emphasis being on enhancing and maintaining the distinctive character and vitality of rural communities; shortening journeys and facilitating access to jobs and services; strengthening rural enterprise and linkages between settlements and their hinterlands; and respecting the quality of tranquillity.
- 5.10 The West Northamptonshire Joint Core Strategy (WNJCS) includes a number of policies on employment land, including an aim to retain employment uses in current employment areas and to allocate a number of new strategic employment sites.
- 5.11 Policy S7 states that provision will be made for a minimum net increase of 28,500 jobs in the plan period, from 2008-2029. Policy S8 'Distribution of Jobs' of the WNJCS states that the majority of new job growth will be concentrated within the principal urban area of Northampton.
- 5.12 Paragraph 5.70 in the supporting text to the policy, notes that the area remains attractive to the warehousing industry and indications are that it is likely to remain so for the life time of the Plan. Paragraph 5.71 notes that the

“majority of any new warehousing will be accommodated on existing employment sites through the employment land supply pipeline and churn of employment land”.

- 5.13 The WNJCS Vision makes reference to the economy for the West Northamptonshire plan area: ‘...the area will form an outstanding UK location of choice for diverse employment opportunities...The area’s proximity to London and connections to other parts of the UK and beyond will continue to be a great economic strength’.
- 5.14 Policy S10 ‘Sustainable Development Principles’ states that development will achieve the highest standards of sustainable design, incorporating safety, security and a strong sense of place; be designed to improve environmental performance; make use of sustainably sourced materials; minimise resource demand and generation of waste; be located where services and facilities can be easily accessed by non-car methods; maximise sustainable sources of energy; promote the creation of green infrastructure networks, biodiversity and reduce habitat fragmentation; and minimise pollution from noise, air and run-off;
- 5.15 Policy C1 ‘Changing Behaviour and Achieving Modal Shift’ states that: ‘...priority will be given to proposed transport schemes that will contribute to behavioural change by
1. providing access by walking, cycling and public transport to key facilities and services;
 2. promoting the use of walking, cycling and public transport over and above private car trips;
 3. maximising the use of existing capacity within transport infrastructure;
 4. managing the demand for car-based travel within urban areas.’
- 5.16 Policy C2 ‘New Developments’ states that new development in the towns and primary service villages will be expected to achieve modal shift targets by maximising travel choice from non-car modes. Development will be required to mitigate its effects on the highway network and be supported by a transport assessment and travel plan prepared in accordance with best practice.
- 5.17 Policy S11 ‘Low Carbon and Renewable Energy’ requires major development to contribute to reductions in carbon emissions and adapt to effects of climate change through Policy S10, in order to maximise energy using sustainable design and construction, energy efficiency, and the use of renewable and low carbon energy, including provision of decentralised energy where appropriate. All new non-residential developments over 500sq.m in floorspace are required to achieve a minimum rating of BREEAM ‘Very Good’ or any future national equivalent zero carbon standard from 2019, unless it can be demonstrated that they would make the development unviable.
- 5.18 Policy BN1 ‘Green Infrastructure Connections’ states that measures to enhance existing and provide new green infrastructure provision will be designed and delivered sustainably; mitigate and adapt to the effects of climate change; be designed to the highest quality; reflect local character; and be supported by a long-term management strategy.
- 5.19 Policy BN2 ‘Biodiversity’ states that development that will maintain and enhance existing designations and assets or deliver a net gain in biodiversity will be supported. Development that has the potential to harm sites of ecological importance will be subject to an ecological assessment and required to demonstrate the methods used to conserve biodiversity through design; how habitat conservation, enhancement and creation can be achieved through linking habitats; and how designated sites, protected species and priority habitats will be safeguarded.
- 5.20 Policy BN5 ‘The Historic Environment and Landscape’ states that designated and non-designated heritage assets will be conserved and enhanced in recognition of their individual and cumulative significance and contribution to West Northamptonshire’s local distinctiveness and sense of place. Development in areas of landscape sensitivity and/or known historic or heritage significance will be required to sustain and enhance the heritage and landscape

features which contribute to the area including conservation areas; significant historic landscapes; the skyline and landscape settings of towns and villages; sites of historic significance; and locally and nationally important buildings, structures and monuments. Places should be sympathetic to locally distinctive landscape features, design styles and materials to contribute to a sense of place.

- 5.21 Policy BN7A 'Water Supply, Quality and Wastewater Infrastructure' notes that development proposals should use sustainable drainage systems wherever practicable, to improve water quality, reduce flood risk and provide environmental and adaptation benefits.
- 5.22 Policy BN7 'Flood Risk' requires all new development to demonstrate that there is no increased risk of flooding to existing properties, and proposed development is – or can be – safe. Proposals above 1 hectare in size in Flood Risk Zone 1 must be accompanied by a FRA.
- 5.23 Policy BN9 'Planning for Pollution Control' states that proposals for new development which are likely to cause pollution will need to demonstrate that they provide opportunities to minimise pollution, including maintaining and improving air quality; protecting and improving surface and groundwater water quality; minimising light pollution; ensuring remediation of contaminated land; and reducing the adverse impacts of noise.
- 5.24 Policy BN10 'Ground Instability' states that development will be permitted on sites of unstable or potentially unstable land provided that the nature of ground instability has been assessed, and a ground stability report has been provided. The development must not add to the instability of the site or surrounding land. Any required remedial works must be implemented prior to the commencement of development to the satisfaction of the LPA.
- 5.25 Policy INF1 'Approach to Infrastructure Delivery' states that where development generates a need for new infrastructure developers will need to demonstrate that provision will be made to meet the necessary requirements arising from that development within an appropriate timescale.
- 5.26 Policy INF2 'Contributions to Infrastructure Requirements' states that new development will only be permitted if the necessary on and off-site infrastructure that is required to support it, or mitigate its impact, can be secured by a reliable mechanism.
- 5.27 Policy R2 of the WNJCS supports proposals that sustain and enhance the rural economy, including the re-use of farm buildings, farm diversification and small-scale employment development to meet local needs. These strategic policies are based on the West Northamptonshire Employment Land Study (2010).

Settlements and Countryside Local Plan Part 2 (adopted December 2019)

- 5.28 On 20 February 2020, Daventry District Council adopted their Settlements and Countryside Local Plan (Part 2), until 2029.
- 5.29 Policy SP1 'Daventry District Spatial Strategy' of the Local Plan Part 2 guides sustainable development and seeks to ensure that a sustainable pattern of development is guided across the authority area. In particular, the policy seeks to promote a vibrant economy and enhance a network of employment areas across the authority area.
- 5.30 Policy RA6 of the Local Plan Part 2 relates specifically to the Open Countryside. The Policy states that for development proposed outside of the confines of villages, only the following forms will be supported (deleted as appropriate to the proposal):

- Economic development that otherwise accords with Policy EC4 of the Local Plan Part 2 (strategic employment areas) or Policy R2 (rural economy) of the West Northamptonshire Joint Core Strategy; or
 - Development that otherwise accords with Policies RA1, RA2 and RA3 of the Local Plan Part 2 (these relate to the confines of villages and settlements).
- 5.31 The Part 2 Local Plan provides for additional non-strategic employment land within the town of Daventry and identifies strategic employment areas where new employment uses should relocate.
- 5.32 Policy EC4 relates specifically to ‘Strategic Employment Areas’ and states that further economic development beyond the defined Strategic Employment Areas will be supported where:
1. It is well related to the existing Strategic Employment Area;
 2. It is of an appropriate scale and character;
 3. It does not harm the amenity of surrounding residential properties; and
 4. It is demonstrated that it is necessary to support the role and function of the Strategic Employment Area or DIRFT (as applicable). Where development is intended to support or enhance DIRFT, lack of capacity within both DIRFT and the Crick Strategic Employment Area will need to be demonstrated.
- 5.33 Paragraph 8.2.01 of the Daventry Local Plan Part 2 relates to lorry traffic and logistics companies. The paragraph states that:
- ‘There is a high level of lorry traffic in the District due to the presence of a large number of companies which rely on lorry movements, as well as the logistics companies which are located across the District, in particular at DIRFT near the A5 and M1. Further demand for such facilities is influenced by the location of the District relative to the ports (served by the M1 and A14 corridors) and the need for drivers to take breaks at the time when they arrive. The 2017 National Survey of Lorry Parking identified that there were particular issues of lorry parking at Junction 18 of the M1, where DIRFT is situated. It is therefore important that there is sufficient suitable lorry parking facilities available to allow for comfort breaks and waiting time. Such facilities would normally be expected to include toilets, shower facilities, eating facilities and bin storage.’**
- 5.34 Policy ENV5 ‘Biodiversity’ of the Local Plan Part 2 states that all proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment and include details of mitigation or compensation, where harm will be caused. Proposals should seek to achieve a net gain for biodiversity, including the creation and management of new habitats, strengthening existing networks, and avoiding fragmentation.
- 5.35 Policy ENV7 ‘Historic Environment’ states that proposals affecting the historic environment must demonstrate a clear understanding of any potential impact on the significance of heritage assets and their setting. As a minimum, the Northamptonshire Historic Environment Record should be consulted.
- 5.36 Policy ENV10 ‘Design’ states that development of a high quality will be supported. High quality design is achieved by:
1. Promoting or reinforcing local distinctiveness and enhancing its surroundings;
 2. Taking account of local building traditions and materials;
 3. Ensuring that the scale, density, massing, height, layout and access of the proposal combine to ensure development blends well within the site and with its surroundings;
 4. Incorporating crime prevention measures in the site layout and building design;

5. Integrating existing landscape features of the site with proposed landscaping and open space;
6. Providing details of suitable comprehensive landscaping scheme;
7. Responding to wider landscape context; and
8. Protecting the amenity of new and existing dwellings and not compromise the function of existing surrounding uses.

National Planning Policy Framework

5.37 The National Planning Policy Framework ('the Framework') was updated in July 2021. It sets out the Government's planning policies for England and how these are expected to be applied. The policies contained within the Framework are material considerations which local planning authorities should take into account.

5.38 Paragraph 7 sets out that the purpose of the Framework is to achieve sustainable development. The Framework identifies that to achieve sustainable development the planning system must adopt three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:

- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.39 Paragraph 39 states that early engagement has significant potential to improve the effectiveness of the planning system. The more issues that can be resolved at pre-application stage, the greater the benefits.

5.40 Chapter 6 is focused on building a strong, competitive economy and establishes that decisions should *'help create the conditions in which businesses can invest, expand and adapt'* (Paragraph 80). Paragraph 83 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

5.41 Paragraph 85 states that planning policies and decisions should recognise that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. It continues, **"In these circumstances, it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)."**

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

- 5.43 Paragraph 111 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.44 Paragraph 113 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- 5.45 Section 11 of the NPPF relates to making effective use of land. Paragraph 120 states that planning policies and decisions should support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
- 5.46 Paragraph 154 requires new development to be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure. New development can help to reduce greenhouse gas emissions, such as through its location, orientation and design.
- 5.47 Paragraph 180 states that when determining planning applications, local planning authorities should ensure that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- 5.48 Paragraph 183 requires planning policies and decisions to ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land stability and contamination. After remediation, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.
- 5.49 Paragraph 185 requires new development to be appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.
- 5.50 Paragraph 194 requires applicants to describe the significance of any heritage assets affected, including contribution made by their setting. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.
- 5.51 Paragraph 199 states that where a development is proposed that would affect the significance of a designated heritage asset, great weight should be given to the asset's conservation and that the greater an asset's significance, the greater this weight should be. Paragraph 201 emphasises that where a proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this should be weighed against the public benefits of the scheme, bearing in mind the great weight highlighted in Paragraph 199.

Emerging West Northamptonshire Strategic Plan

- 5.52 As the Joint Core Strategy is now more than 5 years old, the West Northamptonshire Joint Planning Unit are in the process of preparing the West Northamptonshire Strategic Plan. The Options Consultation on the plan opened on the 11th October 2021 and closed on the 6th December 2021. The Plan will set the spatial vision for West Northamptonshire; spatial strategy for the distribution of development; an overall jobs target; and guidance on the strategic locations for new employment land and strategic development and infrastructure.

5.53 Consultation on the Issues Paper at Regulation 18 was held in August-October 2019. This considered the options for the spatial strategy and the need for economic growth. A Call for Sites was also held at this time.

West Northamptonshire Housing and Economic Needs Assessment (HENA) (July 2021)

5.54 The West Northamptonshire Housing and Economic Needs Assessment was produced by GL Hearn on behalf of West Northamptonshire Council and published in July 2021.

5.55 The West Northamptonshire Housing and Economic Need Assessment (HENA) assesses future development needs for housing (both market and affordable) and employment across the geography of West Northamptonshire (formerly South Northamptonshire, Daventry and Northampton) over the period 2020-2050.

5.56 The overarching conclusions of the Assessment indicated that in respect of industrial warehouse floorspace:

- Industrial floorspace has increased by 25% in West Northants since 2001, which has been primarily driven by large gains through the construction of Prologis DIRFT in Daventry.
- Take-up typically concentrates in key industrial estates with access to the M1. This is because strategic industrial spaces require motorway access.
- Overall there is very strong demand and occupiers continue to see constraints in supply. As a result, rents have been increasing in the area. There is a healthy supply position at first glance, but this is due to a high amount of speculative floorspace being advertised. Agents have confirmed there is a lack of high-quality space available.
- There is demand across all size bands of industrial units as demand for logistics and warehouse space is seen to be increasing.

West Northamptonshire Strategic Land Availability Assessment (September 2021)

5.57 The methodology for the Strategic Land Availability Assessment (SLAA) was consulted on from January to March 2020, to identify a future supply of land for housing and economic development over the plan period covered by the emerging Strategic Plan.

5.58 The proposed size threshold for sites was 20 ha or more for economic development due to the strategic nature of the site.

5.59 The identified needs for employment set out by the HENA confirms an identified need of 26.62 hectares in Daventry District; 23.2 ha in Northampton; a surplus of 2.2 ha in South Northamptonshire. This results in an overall need of 47.62 ha within West Northamptonshire.

5.60 Within Daventry, there is a total industrial land supply of 55.69 ha, and total recommended need of 82.3 ha.

5.61 In total, there is 45 hectares of deliverable employment land; 479.53 hectares of developable employment land; and 152 ha of not developable employment land.

West Northamptonshire Strategic Plan Employment Background Paper September 2021

5.62 The Employment Background Paper for the West Northamptonshire Strategic Plan, was published in September 2021.

5.63 The background paper sets out the current national and local policy context and guidance regarding employment. It also summarises the findings of the Housing and Economic Needs Assessment including the number of jobs needed across West Northamptonshire to 2050 and the amount of industrial land that is needed over the same period.

5.64 The Paper concludes that although the HENA does not attempt to assess in full the strategic warehousing requirements for the period to 2050, it does take a light touch approach to considering strategic needs to test the broader findings and recommendations. Overall, the Paper concludes at paragraph 4.18 that:

'The HENA recommends that further evidence on strategic warehousing need and the sites suitable to meet this need may be beneficial. The commissioning of such evidence will be considered further as the plan progresses and ideally this will cover a wider than West Northamptonshire geography, particularly given its cross-boundary implications.'

6. Planning Appraisal

6.1 This section of the Statement considers the application proposals in the context of the adopted development plan.

6.2 The following matters are considered:

- Basis for Decision Taking;
- Principle of Development;
- Site specific considerations:
 - Design and Layout;
 - Ecology and Trees;
 - Flood Risk and Drainage;
 - Heritage;
 - Highways and Access;
 - Infrastructure;
 - Landscape and Visual Impact; and
 - Noise.

Basis of Decision Taking

6.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the development plan unless there are material considerations which indicate otherwise. Paragraph 11 of the Framework, the presumption in favour of sustainable development, asks decision-makers to approve development proposals that accord with the development plan without delay.

6.4 The adopted Development Plan for the area comprises the **Joint Core Strategy** (Local Plan Part 1) for West Northamptonshire (adopted December 2014), **Daventry's Settlements and Countryside Local Plan** (Local Plan Part 2) adopted in February 2020, and the saved policies of the **Daventry Local Plan** (adopted 1997).

6.5 The starting point for decision taking is the statutory development plan, in addition to this, includes the following material considerations:

- The National Planning Policy Framework;
- National Planning Practice Guidance;
- The emerging West Northamptonshire Strategic Plan; and
- Other relevant adopted guidance and evidence base documents.

6.6 As noted above, the Framework is an important material consideration in determining the application.

Principle of Development

Compliance with the Development Plan and other Material Considerations

6.7 Paragraph 81 of the NPPF makes it clear that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It goes on to state that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

- 6.8 Paragraph 85 of the NPPF states that planning policies and decisions should recognise that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. It continues, **‘In these circumstances, it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).’**
- 6.9 The WNJCS Vision makes reference to the economy for the West Northamptonshire plan area: **‘...the area will form an outstanding UK location of choice for diverse employment opportunities...The area’s proximity to London and connections to other parts of the UK and beyond will continue to be a great economic strength’.**
- 6.10 The Department for Transport published its Future of Freight: a long-term plan in June 2022. The June 2022 Plan followed the operational challenge of the Covid pandemic and the transition to a new relationship with the EU, whilst managing the impacts of the Russia-Ukraine war and longer-term implications for the global free-trade system. It seeks to plan for the future, to ensure that the country is meeting the opportunities and challenges of the transition to net zero.
- 6.11 The Plan, in the Executive Summary states that that:
- ‘Freight and logistics has a key role to play in the delivery of a number of public policy outcomes. The sector can make a significant contribution to levelling up and strengthening the union as a geographically distributed employer supporting economic activity across the UK. And the sector is the gateway for UK plc to imports, exports and global markets, making it is central to strengthening the UK's global impact.’**
- 6.12 In this regard, Iceni was commissioned by the South East Midland Local Economic Partnership (SEMLEP) on behalf of the constituent local authority partners including North Northamptonshire to consider future demand scenarios for logistics premises and the potential implications for the local economy.
- 6.13 Iceni reports at paragraph 1.7 that in 2020, warehouse specific employment accounted for around 49,000 jobs and 6% of all employment, increasing by over 50% from 2015 to 2020. The growth in the sector can be accounted for due to a number of trends, including the growth in e-commerce, warehouse automation, de-carbonisation and power and sustainability. Turning in particular to the growth in e-commerce, Iceni reports that the direct consumer deliveries have become a central component in the modern lifestyle and are the single most significant component generating change in the logistics sector.
- 6.14 The Iceni Report states that under the core scenarios, the range of shortfall of logistics floorspace ranges from between 237 and 576ha across the study area.
- 6.15 The West Northamptonshire Housing and Economic Needs Assessment was produced by GL Hearn on behalf of West Northamptonshire Council and published in July 2021.
- 6.16 The West Northamptonshire Housing and Economic Need Assessment (HENA) assesses future development needs for housing (both market and affordable) and employment across the geography of West Northamptonshire (formerly South Northamptonshire, Daventry and Northampton) over the period 2020-2050.
- 6.17 The overarching conclusions of the Assessment indicated that in respect of industrial warehouse floorspace:
- Industrial floorspace has increased by 25% in West Northants since 2001, which has been primarily driven by large gains through the construction of Prologis DIRFT in Daventry.

- Take-up typically concentrates in key industrial estates with access to the M1. This is because strategic industrial spaces require motorway access.
- Overall there is very strong demand and occupiers continue to see constraints in supply. As a result, rents have been increasing in the area. There is a healthy supply position at first glance, but this is due to a high amount of speculative floorspace being advertised. Agents have confirmed there is a lack of high-quality space available.
- There is demand across all size bands of industrial units as demand for logistics and warehouse space is seen to be increasing.

6.18 The UK Logistics' market has been resilient to the recent pandemic owing to the rise in ecommerce and companies increased use of 3rd Party Logistics providers. 2020 was a record year for the Logistics property sector with supply levels at an all-time low, and consistent demand for, well-located, good quality existing warehouses. Further research in the local area in particular, indicates that there is also a pressing need for large format logistics warehousing.

6.19 The application site comprises a former quarry and the northern area is subject to an extant permission for a roadside services including a lorry park. In this regard, the Daventry Local Plan recognises the need to provide for space for lorry parking, in light of the demand for logistics warehousing and the demand from a range of operators across the country.

6.20 The demand for logistics space in the area is rising considerably, due to its connectivity which has driven interest from occupiers seeking to acquire large buildings. Availability of such warehouse space in the area is limited, and there is a need to consider other appropriately located sites, which would otherwise not have implications on the setting of the countryside or other residential areas.

6.21 The application site is an optimal location, due to the presence of an extant permission for a large scale commercial development, its location in proximity to the M1 and M6 junction, and its former use as a quarry.

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

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

6.24 The application site and the proposed development responds directly to the Government's overarching aspirations to create opportunities to help support the local economy, in sustainable locations. In this regard, a growing population that is increasingly turning to online retail, is putting pressure on existing warehouse space and the predicted growth trajectory for online sales suggests many local authorities are forecast to have a significant shortfall of available warehouse space. Furthermore, additional housing in Daventry and the wider region will exacerbate the need for warehouse space, leading to the need to release further suitably located sites for such development.

6.25 The Daventry Local Plan Part 2 allocates land adjacent to Daventry for strategic housing growth, including Daventry South West; Micklewel Park Extension; and the remaining parcels of land at Middlemore. A total of up to 1,450

units were allocated to come forward in and adjacent to Daventry. Since the plan's adoption, a resolution to grant was received for 1,100 residential units in December 2020 at land to the south-west of Daventry town centre.

- 6.26 A further four sustainable urban extensions are allocated in the District on the edge of Northampton, at Northampton West, Dallington Grange Gateway, Buckton Fields and Overstone Leys. These would deliver an additional 5,750 homes to meet the housing needs of Northampton.
- 6.27 As demand levels have reached an unprecedented high, supply has been unable to keep up. In the local regional area, Northamptonshire is recognised as one of the most important locations for warehouse and logistics locations in the UK, due to the excellent connectivity to the M1, M6 and A14. Large-scale logistics (generally buildings of 25,000+ sq. ft.) in the district is focused along the M1 at DIRFT, Crick and Northampton. These locations are attractive to major national occupiers, however the developers in these locations are typically targeting very large buildings above 500,000 sq. ft.
- 6.28 However, 'Mid-Box' industrial units (40-150,000 sq. ft.) are more scarcely available and are centred in urban areas at Northampton, Corby and Kettering. These units are attractive to national, regional and local occupiers, and often proximity to large-scale logistics parks is welcomed. An assessment of the 'mid-box' units available in the surrounding area including West Northamptonshire, Kettering and Market Harborough finds that there is strong interest in these units, yet some of the locations would be less attractive than the proposed site, due to the site's proximity to the M1/M6/A14. There are a number of operators with requirements in the area and whose demands are not currently being met due to a substantial lack of supply.
- 6.29 The units proposed as part of this application would provide a dedicated 'mid-box' logistics opportunity in extremely close proximity to the Catthorpe Interchange. The existing current stock does not provide for the current occupier trend of demanding modern units with improved specifications (i.e. increased minimum clear heights and larger external areas, both yard and car parking provisions).
- 6.30 There is demonstrable demand from occupiers looking for suitable space in close proximity to the A14, but at present the current existing / future supply is unsuitable for these parties. There is a shortage of economically viable development land within the area. Those proposed sites do not have the scale of the subject site and will provide for smaller units, similar to those that already existing in the borough and those currently being delivered.
- 6.31 Therefore, the proposal will bring significant benefits that will fulfil the social, economic and environmental strands to sustainable development as set out in the National Planning Policy Framework (NPPF) and the local development plan, both of which are material to the determination of this application.
- 6.32 However, we note the policy requirements of Policy EC4 of the Daventry Local Plan Part 2, which seeks to direct employment areas in the first instance. The Policy specifically refers to further economic development beyond defined Strategic Employment Areas, which the application site relates to. The Policy states that Classes B1(b,c), B2 and B8 Uses will be supported where:
- i. is well-related to the existing Strategic Employment Area; and
 - ii. It is of an appropriate scale and character; and
 - iii. It does not harm the amenity of surrounding residential properties; and
 - iv. It is demonstrated that it is necessary to support the role and function of the Strategic Employment Area or DIRFT; and

- v. It is demonstrated that there is insufficient capacity within the Strategic Employment Area or DIRFT (as applicable) where the development is intended to support or enhance that location, to accommodate the proposed development. Where development is intended to support or enhance DIRFT, lack of capacity within both DIRFT and the Crick Strategic Employment Area will need to be demonstrated.
- 6.33 Paragraph 5.70 in the supporting text to the policy, notes that the area remains attractive to the warehousing industry and indications are that it is likely to remain so for the lifetime of the Plan. Paragraph 5.71 notes that the **'...majority of any new warehousing will be accommodated on existing employment sites through the employment land supply pipeline and churn of employment land'**.
- 6.34 The proposal conflicts with the requirements of Policy EC4, insofar as the application site is not well-related to the existing Strategic Employment Area. However, As set out above, there is an immediate and demonstratable need for additional large-format B8 units within the locality, and the application site would go some way to meeting that identified demand. As we set out in detail below, there are no technical planning matters which would warrant refusal of the scheme, and in light of the site being considered to be previously developed land, the scheme would bring the site back into economically viable use.
- 6.35 There is a significant shortage of suitable development land for industrial and distribution premises, particularly serving the Big Box sector, which has been well documented. The pace of development has been such that development land taken up has not been replaced by land in the pipeline and in many places in the region, the next generation of sites has yet to be identified.
- 6.36 In this regard, the application site represents an opportunity which could be attractive to the Big Bog market as it meets all three key characteristics operators are looking for:
- Location – it benefits from direct access to the A14, which links directly to the west to the M1 but is also an east to west link to Kettering and beyond to the A1(M).
 - Land – it is of sufficient size to accommodate the three proposed buildings and adjoins a recently approved roadside services scheme to the north. The site is located some distance from the nearest residential dwellings and is therefore unlikely to give rise to amenity issues and as set out below, is relatively unconstrained in terms of technical issues.
 - Labour – it is located in close proximity to a number of larger towns and city centres and is therefore in easy reach of a large potential workforce drawn from the wider authority area.
- 6.37 One of the key objectives of the Local Plan is to build on its excellent location in the UK and diversify its overarching employment offer. In this regard, Objective 6, which relates to economic advantages, states that the Council will seek to strengthen and diversify the local economy by taking advantage of its internationally well-placed location, strategic transport network and proximity to London and Birmingham. Furthermore, the Executive Summary notes that freight and logistics has a key role to play in the delivery of a number of public policy outcomes and that the sector can make a significant contribution to levelling up and strengthening the union as a geographically distributed employer supporting economic activity across the UK.
- 6.38 The need for economic development is even more important in light of the impacts of the Covid-19 pandemic on the local economy. Indeed, the economic benefits resulting from the proposed development should be afforded significant weight. In this regard the economic benefits associated with the proposal are substantial, through the provision of jobs during both the construction and operational phases, wider economic outputs, opportunities for improved skills and training and additional business rate income.

Other Material Considerations

Design

- 6.39 Policy ENV10 of the Daventry Local Plan Part 2 relates specifically to design. The Policy states that development that is of a high quality and, in particular, proposals of an exemplary and innovative design that reflect and integrate with the surrounding area and create a strong sense of place, will be supported. In particular, the policy states that high quality design can be achieved by (amongst other criteria), ensuring that the scale, density, massing, height and layout and access of the proposal combines to ensure the development blends well with the site and surroundings, integrates landscape features, responds to the wider landscape context and does not compromise the function of existing surrounding uses.
- 6.40 The application has been submitted in outline, with all matters reserved except access. As the application is applied for with details of appearance, layout, scale and landscaping reserved for future consideration, a Parameter Plan is submitted to identify the developable area. It is expected that the approval will be conditioned by the Parameter Plan and Location Plan.
- 6.41 This development represents an opportunity to create a high quality sustainable development to suit the needs of future occupiers and meet market demand. The proposed development will make efficient and effective use of the site.
- 6.42 An Indicative Masterplan is submitted to provide an example of how the site could be developed to accommodate the quantum of floorspace, over three units.
- 6.43 In designing the indicative scheme, the following key design principles have been adopted:
- Arranging the buildings to reduce their visual impact on the surrounding countryside;
 - The inclusion of a significant hedgerow planting to A1599 and the perimeter of the site to encourage bio diversity;
 - The provision of reinforcement hedgerow planting to the public right of way across the site;
 - No access from the A5199; and
 - The provision of proposed building heights which are varied to suit the mass of the buildings
- 6.44 Vehicular access into the site is from the approved access road taken from a newly constructed roundabout into the northern site. This access road is to be extended into the south site to serve the new buildings. No access is proposed from the A5199.
- 6.45 Inclusive access throughout the site will be provided with 10% accessible parking spaces located near the building entrances, 10% electric vehicle charging point provision and level thresholds into the buildings.
- 6.46 The development aims to achieve a BREEAM rating of very good and an initial BREEAM assessment of the design proposals will be submitted as part of the detailed application. The building will be designed in accordance with the building regulation, approved document L2 and achieve the U-values therein for thermal performance of external elements forming the building fabric. An emphasis will be placed on air tightness design and minimising cold bridges to ensure efficiency of the thermal envelope.

Ecology

- 6.47 Policy BN2 ‘Biodiversity’ of the WNJCS states that development that will maintain and enhance existing designations and assets or deliver a net gain in biodiversity will be supported. Development that has the potential to harm sites of ecological importance will be subject to an ecological assessment and required to demonstrate the methods used to conserve biodiversity through design; how habitat conservation, enhancement and creation can be achieved through linking habitats; and how designated sites, protected species and priority habitats will be safeguarded.
- 6.48 Policy ENV5 ‘Biodiversity’ of the Local Plan Part 2 states that all proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment and include details of mitigation or compensation, where harm will be caused. Proposals should seek to achieve a net gain for biodiversity, including the creation and management of new habitats, strengthening existing networks, and avoiding fragmentation.
- 6.49 Overall, the Extended Phase 1 Habitat Survey produced by Rachel Hacking Ecology, concludes that the Phase 1 Habitats present on the site are common throughout the UK. No nationally rare or locally rare plant species were located during the Extended Phase 1 Habitat Survey. Plants species lists were checked against The Rare Plant Register of Northamptonshire and the former Soke of Peterborough (Wilson, R. 2014).
- 6.50 Furthermore, the Survey concludes that the habitats on site are a diverse mosaic. The grasslands and ephemeral vegetation are fairly species-rich when compared to the rest of the site and the surrounding landscape. The ephemeral/short perennial vegetation appears to satisfy the UK Habitats Classifications criteria for Open Mosaic Habitat (OMH), a UK Priority Habitat. This habitat is of high value to invertebrates. The grasslands, ruderal vegetation and scrub and OMH offer a pollen and nectar source for invertebrates. The scrub, hedgerows and ruderal vegetation offer cover for small mammals and nesting habitat for birds. The ponds are of value to amphibians and invertebrates.
- 6.51 The development proposals involve the loss of the majority of the habitats on site. The permanent ponds (at the north and south of the site), woodland/scrub habitat, and the hedgerows along the A5199 will all be retained. The proposed landscaping scheme (DEP) includes the creation of a variety of species-rich habitats, including native hedgerows, wildflower grassland, a new pond and shrub planting, as well as a high ecological value mixture of ornamental planting. However, the landscaping will not achieve Biodiversity Net Gain, nor adequately compensate for the loss of the UK Priority Habitat and other high value habitats. Therefore, an off-setting scheme is proposed (see *Biodiversity Impact Assessment at Junction 1, A14, Welford, Northamptonshire 2022* – Rachel Hacking Ecology), which will aim to recreate the mosaic of habitats found on site.

Flood Risk and Drainage

- 6.52 Policy BN7 ‘Flood Risk’ requires all new development to demonstrate that there is no increased risk of flooding to existing properties, and proposed development is – or can be – safe. Proposals above 1 hectare in size in Flood Risk Zone 1 must be accompanied by a Flood Risk Assessment (FRA).
- 6.53 NSugg Ltd were commissioned to undertake an FRA to support the planning application as the site is over 1 hectare. The total area of the site lies within Flood Zone 1, however part of the centre and west of the site is shown as being at risk of surface water flooding. It is understood that this is due to the topography of the site, where the existing pond and areas which have been excavated lie. The final site levels shall be revised to accommodate the proposed development and encourage surface water runoff towards a dedicated surface water drainage system.

- 6.54 There is a minor unnamed tributary of the River Avon which flows in a northerly direction along the western boundary of the site, prior to turning east. Naseby Reservoir is approximately 800m east of the site.
- 6.55 Policy BN7A 'Water Supply, Quality and Wastewater Infrastructure' notes that development proposals should use sustainable drainage systems wherever practicable, to improve water quality, reduce flood risk and provide environmental and adaption benefits.
- 6.56 A drainage strategy has been prepared by Goodison Associates which proposes the surface water and foul water drainage strategy for the development. The potential to discharge surface water runoff to ground via infiltration is considered an unsuitable option due to the significant depths of made ground, with potential for leaching of below ground contamination, and low permeability underlying clay strata. Therefore, it is proposed that surface water runoff from the development shall discharge to the tributary watercourse aligned along the western site boundary

Heritage

- 6.57 Policy BN5 'The Historic Environment and Landscape' states that designated and non-designated heritage assets will be conserved and enhanced in recognition of their individual and cumulative significance and contribution to West Northamptonshire's local distinctiveness and sense of place. The impact of development on surrounding heritage assets and their setting should be appreciated and understood.
- 6.58 It was requested in the EIA Screening Opinion that the impact of the proposal upon the heritage assets in the surrounding area should be considered.
- 6.59 Lanpro Services have carried out a Historic Environment Desk-Based Assessment which incorporates the available archaeological, historical, topographic and land-use information in order to clarify the heritage significance and archaeological potential of the site.
- 6.60 There are no designated heritage assets within the application site.
- 6.61 There would have been potential for findspots of later prehistoric and Roman date, and sub-surface remains of medieval and post-medieval agricultural activity. However, due to the widespread impacts of quarrying and landfilling on the site in the late 20th and early 21st century, any archaeological deposits are considered likely to have been removed or severely damaged. If such remains did survive, there is no evidence to suggest that these would be of greater than negligible significance.

Highways and Access

Sustainable Travel

- 6.62 Policy C1 of the JCS is concerned with changing behaviour and achieving modal shift, stating that, '**any capacity improvements should support economic growth and/ or safeguard strategic routes and/ or reduce transport energy use**'.
- 6.63 Policy C2 'New Developments' of the WNJCS states that new development in the towns and primary service villages will be expected to achieve modal shift targets by maximising travel choice from non-car modes. Development will be required to mitigate its effects on the highway network and be supported by a transport assessment and travel plan prepared in accordance with best practice.
- 6.64 Policy ST1 of the Local Plan Part 2 states that proposals should incorporate appropriate infrastructure to support electric vehicle charging.

6.65 Vectos have produced a Transport Assessment which includes a section on a Framework Travel Plan (FTP). The focus of the FTP is to reduce the use of single occupancy car trips to access the site, by promoting car sharing amongst staff and maximising the use of sustainable transport modes. Other measures include:

- Appointing a Travel Plan Co-ordinator;
- Providing a welcome pack/travel information brochure;
- Ensuring there is adequate provision of footways and lighting, and signage for pedestrian routes;
- Making details of bus and train services up to date and permanently on display;
- Provision of EV charging spaces;
- Monitoring the plan regularly.

Access

6.66 Access is applied for in full. Vectos drawing reference VN212105-D101 Rev A is submitted and it is expected this would be an approved drawing to the decision.

6.67 The drawing shows that access to the site would be taken via the approved roundabout arrangement at the A5199/A14 junction serving the westbound slip roads, to be delivered in full as part of the roadside services scheme. It is noted that the roundabout has been partially constructed within the site. The approved roads within the roadside services site have been designed to accommodate HGV movements. Tracking has been completed for the Illustrative Layout Plan to demonstrate that articulated HGVs can be accommodated.

6.68 The comments received from both WNC Highways and National Highways have helped to inform the content of this Transport Assessment (TA).

6.69 An Outline Logistics Plan has been submitted which shows the principles that would be adopted to help manage logistic sites routing to and from the development once operational.

Trip Forecasting and Junction Capacity Assessments

6.70 The trip rates are based on a sample of B8 sites that are the most comparable in terms of locational characteristics. Based on these, the B8 development is expected to generate 88 two-way vehicle trips in the weekday morning peak hour and 86 in the evening peak hour. Of these, 39 could be expected to be HGVs in the morning peak hour and 27 HGVs in the evening peak.

6.71 Detailed junction capacity assessments are provided for the proposed roundabout junction with the A5199, and the A5199/A14 eastbound slips priority junction arrangement to the north. Both of these junctions are expected to accommodate over 30 two-way development trips in each weekday peak hour. The A5199 / Church Lane crossroads roundabout to the south is expected to accommodate a much lower level of development trips in each peak hour, therefore it is not considered necessary to undertake a detailed junction capacity assessment. Merge/diverge assessments have been undertaken for the A14 Junction 1 as requested by National Highways.

6.72 The capacity assessments were undertaken for two future year scenarios (2025 and 2032) and show that the proposed B8 development can be accommodated on the surrounding highway network without any significant impact upon highway capacity.

Public Right of Way Diversion

6.73 There is a bridleway which runs through the development site, Public Right of Way CK2. The principle of relocating the PROW is requested, as it is not yet known the route of the relocation due to the application being made in outline.

Landscape and Visual Impact

6.74 Policy BN5 'The Historic Environment and Landscape' states that designated and non-designated heritage assets will be conserved and enhanced in recognition of their individual and cumulative significance and contribution to West Northamptonshire's local distinctiveness and sense of place. Development in areas of landscape sensitivity and/or known historic or heritage significance will be required to sustain and enhance the heritage and landscape features which contribute to the area including conservation areas; significant historic landscapes; the skyline and landscape settings of towns and villages; sites of historic significance; and locally and nationally important buildings, structures and monuments. Places should be sympathetic to locally distinctive landscape features, design styles and materials to contribute to a sense of place.

6.75 Policy EN1 'Special Landscape Areas' states that certain areas are designated on the proposals map as special landscape areas. **"In these areas planning permissions will normally be granted for development provided that:**

1. It comprises agricultural, forestry, recreation or tourism development; or
2. It relates to settlements within these areas. In assessing such proposals, detailed design, materials, siting and landscaping will be material considerations fundamental to the granting of planning permission;
3. It relates to the re-use or adaptation of rural buildings provided their finished form, bulk and general design are in keeping with their surroundings;
4. It does not adversely affect the character of the local landscape."

6.76 Urban Green have produced a Landscape and Visual Appraisal which considers the character of the landscape, vegetation, landscape features and designations within and surrounding the site, and the composition of selected views from identified visual receptors as a result of the proposed development.

6.77 In terms of landscape effects, the LVIA concludes that the proposed redevelopment of the appraisal site would give rise to some Negligible and Moderate effects on landscape character, Moderate effects on landscape features and vegetation, Moderate Adverse effects in terms of the impact upon the SLA designation, Moderate Adverse effects on heritage Assets in close proximity to the Appraisal Site and Slight Beneficial effects on Built Form within the Appraisal Site. It is therefore considered that the proposals do not constitute an overall significant or unacceptable environmental effect.

6.78 Turning to visual effects, the LVIA concludes that The industrial development of the appraisal site is therefore considered to have a range of Negligible to Major/Moderate effects on visual receptors within the study area and effects are principally limited to receptors within close proximity to the site. The appraisal site is largely visually well contained, particularly in views from the north and east due to the combination of landform and the significant areas of mature vegetation along the roadsides of the A14 and the A5199, and planting and landform surrounding Naseby Reservoir. More open views towards the appraisal site are available from the western and southern extents of the study area, particularly where rising topography provides elevated viewing opportunities across the study area.

6.79 As with any development, a number of effects arise from the proposed development. These range from Negligible to Moderate on the contextual and appraisal site landscape receptors; and Negligible through to Major/Moderate

on a limited number of visual receptors as a result of the change in the character and amenity of the view as a result of the change (from open scrub land to that of industrial development). Effects on visual receptors will diminish over time as planting within the green infrastructure areas matures.

- 6.80 The proposed development has been laid out to largely retain the existing landscape features including boundary trees, hedges, waterbodies and features addressing the adopted local policy. Occasional openings for access may be made through some hedge lines to enable access. All hedges and boundary planting will be enhanced with additional tree planting and native shrubs where appropriate.
- 6.81 In summary, it is considered that the appraisal site has an existing relationship with the Industrial and commercial uses along the A14 and A5199 roads and that on balance the proposed development will, whilst wholly replacing portions of the landscape character at the site level, sit within the existing retained landscape character elements at the site level and the landscape character at the regional and district level. Whilst some adverse landscape and visual effects will arise from the proposed development as it emerges, the development of this land is largely visually well contained. Furthermore, the landscape and visual effects are largely limited to the appraisal site and local level receptors adjacent to the appraisal site, as identified in this Appraisal. The effects will reduce over time as planting matures. New tree planting and a vegetation strategy are to be considered for long term replacement and reinforcement of existing green infrastructure networks, ensuring the longevity and vigour of the existing vegetation is maintained on site.

Trees

- 6.82 Policy ENV5 'Biodiversity' states that the Council will support proposals that conserve and enhance designated and undesignated sites and species of national and local importance. The level of protection should be proportionate to the site's designation status and the contribution it makes to the ecological network.
- 6.83 Urban Green have produced an Arboricultural Impact Assessment which assesses the trees on the site and within an influencing distance, in accordance with BS5837:2012. Eight individual trees, 12 groups and three hedges were assessed. One of these trees was outside the application site and two groups were outside the site.
- 6.84 The proposed development, if it would come forward in the form proposed on the Illustrative Layout, would necessitate the removal of one tree, three groups of trees along with sections of three additional groups/hedges. The layout and design of the scheme is not fixed, therefore at this stage, it is unknown which trees and/or hedges would need to be removed or had works to facilitate the development. An updated AIA would need to support the reserved matters application.

Noise

- 6.85 Policy BN9 'Planning for Pollution Control' states that proposals for new development which are likely to cause pollution will need to demonstrate that they provide opportunities to minimise pollution, including maintaining and improving air quality; protecting and improving surface and groundwater water quality; minimising light pollution; ensuring remediation of contaminated land; and reducing the adverse impacts of noise.
- 6.86 ADC Acoustics has produced a Noise Impact Assessment to assess the suitability of the application site for the proposed development from a noise perspective.
- 6.87 Very detailed modelling has been carried out, based on somewhat extreme worst case assumptions of activity levels. Although we have modelled daytime, evening and night time separately, the assessment present is based on the busiest daytime period persisting 24 hours a day.

6.88 Predicted levels would rate under BS 4142 well below “low impact depending on the context”, even if peak period daytime activity were to persist through the night. The context of course is an area affected by a busy road. The impact overall should be negligible at all times. No physical or management (eg. working hours) mitigation should be required. Our only recommendations that you issue this report to Planners and invite Officers to contact us directly with any queries.

7. Conclusions

7.1 This Planning Statement has been prepared by Nexus Planning on behalf of Monte Blackburn Ltd, in support of the following development:

‘Outline planning application with all matters reserved except means of access, for the development of three no. Use Class B8 units.’

7.2 This Statement demonstrates that the application site is in a wholly sustainable location for the development of new B2/B8 commercial floorspace.

7.3 The application proposals have been the subject of pre-application discussions with the Council through a formal pre-application request and meeting held in April 2021. Full details of the pre-application discussions and feedback from the Council are provided at Section 3.

7.4 The proposal will bring significant benefits that will fulfil the social, economic and environmental strands to sustainable development as set out in the National Planning Policy Framework (NPPF) and the local development plan, both of which are material to the determination of this application.

7.5 The scheme is in response to an occupier requirement for floorspace in this location, and the applicant is currently in discussions with a food retailer to occupy floorspace at the application site.

7.6 The development proposal conflicts with Policy EC4 of the development plan in light of the application site being situated outside of the Strategic Employment Area and within the open countryside. However, the proposal does fully accord with the economic objectives contained within the adopted local plan, and in particular paragraph 81 of the NPPF which states that significant weight should be placed on the need to support economic growth and productivity.

7.7 In this regard, it has been demonstrated that there is significant demand for the nature of the employment floorspace proposed and that the application site provides the best opportunity to meet this demand. The technical planning matters summarised above and provided in the supporting application documents also demonstrate that the site is an entirely suitable, previously developed site in a highly accessible and sustainable location.

7.8 The key benefits of the proposal can be summarised as follows:

- The ability to provide a market leading storage and distribution development, which will provide a significant positive impact upon the local Daventry economy;
- There is an identified lack of choice and opportunity to accommodate the type and scale of large-scale distribution and logistics uses in commercially attractive locations within the local area, and in particular in an accessible location in proximity to the M1 and M6;
- The proposed development has the potential to deliver a substantial level of new jobs in the local area and a substantial local input into the economy per annum;
- The proposed development will provide for a range of jobs opportunities for residents of Daventry and further afield. This will include full-time jobs, from entry level through to skilled technical and managerial roles; and
- The proposed development will provide a significant flagship employment land investment in Daventry, providing a sub-regional distribution hub, and establishing Daventry as an important and vital distribution location.

- 7.9 The proposals will also result in significant economic benefits including the creation of new job opportunities and significant new investment in the authority area.
- 7.10 It is therefore considered that, taken together, the benefits of the proposal clearly outweigh the development plan conflict and it is therefore concluded that the scheme warrants support and should be granted planning permission.

