

PATTISHALL PARISH COUNCIL

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**To: West Northants Council
Local Plan Consultation, SNC**
From: Pattishall Parish Council
**Ref: Response to the WNC Employment Site Allocations Development Brief
Supplementary Planning Document (SPD) consultation**

Pattishall Parish Council was pleased to see the publication of the draft SPD which when completed will be used to guide and support the future development of 4 of the 5 employment allocations in South Northants (AL1, AL2, AL4 and AL5). We fully support its purpose to “reduce uncertainty” and provide “clear guidance” on what is expected from future developments.

Although the format and much of the content is good, the Council believes there are certain sections where the content must be improved if the document is to meet its stated purpose. Members comments and recommendations below cover 4 key areas:

1. Cumulative Traffic Impact Assessment
2. Overarching Design Principles
3. Small and Medium buildings - with a Maximum Footprint of 5000m²
4. Maximum Ridge Height of buildings – up to 10m.

Cumulative Traffic Impact Assessment: Para 1.21 on p8 describes Transport Assessments and Statements and we believe the wording needs to be more prescriptive (eg “may” should state “will”) and more detailed. Our proposed wording for 1.21 is:

“It is important to give appropriate consideration to the cumulative impacts arising from the other committed development (ie development that is consented or allocated where there is a reasonable degree of certainty it will proceed within the next 3 years). At the decision-taking stage this will require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of transport network as well as other relevant local sites benefitting from as yet unimplemented planning approval. For each development application, traffic impact should be assessed on a consistent basis across sites, and cumulatively factoring all built and committed sites that have an impact on the same stretches of road. This is in the context of prior pinch point funding on the Tove/Abthorpe roundabouts and predicated on creating a road network able to cope with 3000 new houses on the southern side of Towcester”.

The Council also requests that Cumulative Traffic Impact Assessment is included in the section on Overarching Design Principles on p62. Our proposed wording is in 5.3 point 2 below.

The Overarching Design Principles: The Parish Council agrees that the stated 'Overarching Design Principles' for all 4 sites are very important and must be clearly reflected in any planning application submitted (or submitted and not yet determined) for all of the sites. Members are concerned that some of the wording in paragraphs 5.2 and 5.3 is not sufficiently clear and direct, and we also believe that 2 more points should be added covering 'traffic impact assessment' and 'electric charging'. Our proposed amended wording for 5.2 and 5.3 is below, and we believe this will help ensure that the SPD meets its stated purpose:

5.2 These principles must be reflected in any development proposed for the four employment sites. No justification will be accepted for any development proposal that does not fulfil these general design principles.

5.3 New development for all of the four allocated employment sites will:

1. Support Local Plan policy to deliver high quality small and medium scale development that is respectful of its setting within the boundaries of the allocation sites.
2. Provide evidence of cumulative impacts on the wider road network and key junctions/roundabouts as well as assessing the local impact of increased traffic arising from the development proposed.
3. Ensure that development platforms are constructed to reduce the impact of the scale and massing of buildings on local character and the setting of the site, either in response to their height and/or the long & uniform ridge lines they may introduce.
4. Minimise any visual overbearance on short distance views, through measures such as landscape screening and elevational treatment, and avoid significantly altering the character of middle or long distance views.
5. Incorporate high quality design solutions (including the use of material, colour palette, and/or architectural articulations) and landscaping to reduce the impact of building heights.
6. Enhance existing landscape features and planting, where possible using traditional field patterns and woodlands as design inspiration. Provide high quality large scale planting to the boundaries of the site within the confines of the existing allocation site.
7. Contribute to the area's wider green network, including rights of way, habitat corridors and linkages. At least 10% biodiversity net gain will be provided on site in line with the requirements of the Environment Act 2021.
8. Use existing and provide new footpath, cycle, and road networks to support and encourage sustainable travel and promote modal shift to the site from local residential areas and around the site.
9. Ensure the council and public transport operators are consulted so that proposals for funding public transport improvements are made, including frequency and access to services for future employees and providing new services where applicable.
10. Provide definitive plans to address the existing appearance of the road network in a positive manner, be that through new active building frontage and decorative planting and the retention and enhancement of existing native planted boundaries/edges.

11. New areas of parking will incorporate specified-planting, areas of permeable material and SUDs features such as dry or wet swales, allowing the absorption and channeling of surface water.
12. Integrate movement, landscape and SUDs networks within the site by combining new or retained tree planting/hedgerow and SUDs provision along new roads.
13. Limit the impacts on tranquility of each site's rural setting, this includes minimizing/mitigating any light, noise & air pollution or visual clutter (i.e. advertising, corporate livery and logos) resulting from the future operation of new buildings.
14. Provision of electric charging points in carparks will be required to the most up to date standards.

The principle of Small and Medium buildings with a Maximum Footprint of 5000m²: members believe that the original Local Plan was clearly intended for employment developments with small and medium sized buildings. This is in line with current development along the A43 corridor around Towcester which has already set the precedent with buildings up to 5000m². We therefore request that the wording in the SPD makes it clear that AL1, AL2 and AL4 will only have small and medium (up to 5000m²) buildings permitted and all references to large buildings over 8000m² being allowed "in exceptional circumstances" are removed.

Pages 24 to 38 provide important details about the Contextual Considerations for these four employment allocations including the precedent set by the existing scale, form and character of development along the A43 and also the sensitivity required for any new development within the rural setting north of the A43 (i.e. for AL1 and AL2). We note that in para 3.1 on p24 the 1st bullet point states that "the existing scale, form and character of development along the M1 and A43 relating to AL1 – AL4" is a "contextual consideration". We strongly argue that the current development along the M1 is NOT a contextual consideration for AL1, AL2 and AL4 in the rural setting along the A43, other than to underline that the very large buildings in Swan Valley (as shown on p25) are totally unsuitable for AL1, AL2 and AL4.

Pg 38 concludes with a description and definitions of Small, Medium and Large buildings. We recommend that Large buildings are defined as anything from 5001m² and above and that the final paragraph is amended to read:

"The presumption will be for the accommodation, across the employment sites of a mix of small and medium units up to 5,000 m², as defined above. There will be no 'exceptional circumstances' where large scale buildings are agreed for AL1-4 as this would contradict the relevant Local Plan policies and the precedent already set for the A43 corridor".

From p66 onwards (Assessment and Evaluation) the SPD gives details for each of the 4 employment allocations, and this includes "Building Height, Scale and Massing" in 6.25 (AL1), 6.47 (AL2), 6.65 (AL4) and 6.91 (AL5). In each case we request that the relevant paragraphs are amended to clearly state that only Small and Medium sized buildings will be acceptable, and any references to Large sized buildings are removed.

The control of the Maximum Ridge Height of buildings to 10m: p42 to p59 provides much detail about the Landscape and Visual Considerations for the 4 employment allocations and describes the many sensitive receptors in each case. We firmly believe that controlling and restricting building Height is a key consideration in reducing the visual impact of each new development and this is

referenced in the Overarching Design Principles on p62. From p66 onwards (Assessment and Evaluation) the SPD gives details for each of the 4 employment allocations and this includes "Building Height, Scale and Massing" in 6.25 (AL1), 6.47 (AL2), 6.65 (AL4) and 6.91 (AL5). The stated maximum building heights vary by site (eg for AL1 it states "likely rising to approximately 16m in height") and it is unclear if this allows for buildings to be on raised platforms. The Parish Council firmly believes that the maximum Building Ridge Height (AOD) must be no more than 10m for all the employment allocations to effectively manage the significant risk of adverse visual impact and request that the relevant paragraphs in Section 6 are changed to state this.

Pattishall Parish Council hopes that the points made will be taken into consideration.

Yours sincerely,

Ann Addison

Clerk to Pattishall Parish Council
On behalf of Council Members