

## **Planning Application WNS/2021/1819/EIA**

### **Pattishall Parish Council Comments 8th November 2022**

Pattishall PC has previously objected to this proposed Planning Application and regardless of the assurances given to support recent amendments to the application we remain deeply concerned about its detrimental impact on our parishioners, our beautiful rural area, and the historic town of Towcester and its local communities. We therefore object in the strongest terms because:

#### **Visual and Environmental Impacts of the proposed development**

- Regardless of the changes to buildings heights in the revised application the proposed ridge heights of 18.5m (Zone 1) and 21.5m (Zones 2 and 3) are still far too high and will cause a totally unacceptable and significant visual impact on the surrounding area and are totally out of character with the Roman market town of Towcester. These proposed heights are significantly higher than the 16m recommended in the Supplementary Planning Document (SPD) approved by WNC in October 2022.
- The AL1 plot slopes upwards from the A5 (west to east) and from south to north. The proposed solution to this is that the mega warehouses will sit on platforms of levelled earth and this further and significantly increases their ridge heights and visual impact. For example the western aspect of the Zone 1 warehouse is an 18.5m building on a >5m platform resulting in an effective ridge height of ~24m (~79 feet) when viewed from the A5. This is the same for all the proposed warehouses on the AL1 plot, so for example Zone 2 which is also adjacent to the A5 will have an effective total ridge height which is 28m (92 feet) above the A5. This is totally unacceptable and as the DHL drawings clearly show no amount of “robust mitigation” can effectively screen this horrendous visual impact!
- The proposed warehouses on the plot will also have a significant adverse visual impact by their sheer size (potentially 3 large buildings of 20,000m<sup>2</sup> to 30,000m<sup>2</sup>) and Massing effect (up to 100,000m<sup>2</sup> in total on the site). The resulting overbear appearance from local roads and PRoWs is further exacerbated by AL1’s very close proximity to the AL3 site. In line with the principles stated in Local Plan Part2 and reiterated in the SPD the AL1 site should only have Small and Medium scale buildings (up to 8000m<sup>2</sup>) which are far more suited to, and respectful of, its rural setting. It must also be noted that the SPD clearly references the existing scale, form and character of developments along the A43 corridor and underlines how this defines an appropriate scale range for future development. Again this clearly means that development proposals for AL1 should only be considered if they have Small and Medium scale buildings.
- The resulting 24/7 noise, air and light pollution from both additional traffic and the warehouse operations will be hugely detrimental to all local residents and will contribute to climate change.
- The significant adverse visual and environmental impacts of this specific development will be further amplified by its proximity to a number of other industrial developments proposed in this immediate area (AL2, AL3 and AL4, along with the other part of AL1)

#### **The Traffic Impact the Local Road Network**

- We note the new traffic modelling and validation reports and the reassurances that with minor changes to the Tove roundabout and its approach roads this proposed development (AL1) will have no adverse impact on the local road network i.e. the modelling states that traffic volume will clearly increase but that “delays” and “queuing times” will not. Further to this it states that the combined effects of this Planning Application along with other local

employment allocation developments (AL1 Bell Plantation, AL2, AL3 and AL4) are also included in the modelling work and in total there is still no adverse impact on the A5, A43 and Towcester's roads.

- Additionally we note that the report says that "detailed traffic demand matrixes are available on request" but only to "statutory consultees". We reiterate that this is a hugely sensitive issue to all local residents and therefore request that the detailed data used in this model is made available to the public because at this time we have no visibility of the assumptions used in this revised traffic model covering AL1, 2, 3 and 4.
- We accept that the modelling method used has been approved by WNC and NH but are unclear if this means that the data assumptions (eg vehicle movements to / from all the AL sites) has been scrutinized and agreed. It seems wholly appropriate in the spirit of transparency and to address significant local concerns, that both WNC and NH issue their own confirmations that the modelling method and data assumptions have been scutinised and meet their requirements.
- The report does not address local concerns about frequent and dangerous "rat running" through several surrounding local rural villages with narrow roads.
- Overall we remain very concerned that the combination of the significant additional traffic associated with this proposed AL1 development, and in combination with the other AL1, AL2, AL3 and AL4 developments, will have a catastrophic impact on the already overloaded A5 and A43 around Towcester and therefore on Towcester town itself and all the surrounding villages.

### **Employment Needs and Use**

- We note the inclusion of the report "Labour Market Appraisal & Local Labour Strategy" written by consultants Savills earlier in 2022, but we have reservations about its content and certainly do not see it as supporting the Planning Application for AL1 which will generate ~1600 largely low skilled jobs in the Warehouse and Logistics sector.
- Central to our concerns is that the employment allocations north of Towcester have clearly stated core roles as set out in LPP2 and this includes: to meet local demand and strengthen the rural economy, to meet the demand for small and medium sized units, and to reduce the level of out commuting. The report produced by Savills does not clearly and consistently reference what is meant by "local" (in fact they generally apply a wider strategic lens for the whole of West Northants) and fails to justify why the creation of hundreds of largely low skilled jobs is of any benefit to Towcester and it's surrounding area.
- The report does state that the Towcester / South Northants area has one of the lowest unemployment rates in the UK and one of the highest employment rates, and has a highly skilled workforce. These facts are also recognised in the Socio Economic Context section of the agreed SPD. Overall therefore it is clear that there is no justification for creating a large number of logistics and warehousing jobs and, given the very low unemployment levels in the local area, it is highly likely that the great majority of the workforce will not be local. This is further supported by the widely reported recruitment difficulties other logistics companies are already having in Northampton and the wider Northamptonshire area.
- Overall this report provides no evidence for the need or benefit for warehouse and logistics jobs on the edge of Towcester which is a predominantly high skill employment area forming part of a larger (South Northants) high skills employment area. If the Employment Allocations are correctly developed with small and medium sized enterprises to create jobs which match the local skills matrix they would meet the principles as set out in LPP2 including a reduction in "out commuting". The current DHL Planning Application will only create jobs which will require a significant amount of "in commuting" from the wider Northants area and beyond adding to congestion on local roads and pollution.

### **Traffic Plan – footpaths and Cycle ways**

- We note the inclusion of a Toucan crossing on the east side of the Tove roundabout and continue to have serious concerns about both the safety and potential traffic impacts of this type of crossing. We also believe that similar Toucan crossings are proposed on the new roundabout on the A43 servicing the AL3 development, and on the western side of the Tove roundabout giving access to the AL2 site.
- In combination these crossings have a significant user safety risk and should be replaced with appropriate footbridges. In addition this type of crossing must also impact on traffic flows based on their assumed frequent use at peak times, but again we wish to see how this has been built into the new Traffic Modelling work.

In conclusion we object most strongly to this application which will have a massive adverse effect on Towcester and many surrounding village communities because of its visual and environmental impacts, the resulting significant increase in traffic and congestion on the A5 / A43 on the north side of Towcester as well as on country roads through local villages, and because it does not align to the core employment principles in LPP2.

Overall we continue to believe that this proposed development contravenes the letter and spirit of the South Northamptonshire Part 2 Local Plan (and indeed the WNJCS Local Plan) as this site is clearly suited to and expected to have 'small' or 'medium' sized commercial buildings which will create high skilled jobs suited to our local workforce.