

`To:

Samantha Taylor

West Northamptonshire Council

Planning Department

The Forum

Moat Lane

Towcester

NN12 6AD

Date: 29/03/2023

Re: WNS/2021/1741/EIA

Furtho Pit – Frontier Developments – AL5 Cosgrove / Old Stratford

Old Stratford Parish Council wish to **OBJECT** to application and request that West Northamptonshire Council refuse permission on the following reasons.

**Adherence to the Local Plan and Supplementary Planning Document. Part 2:**

AL5 sites allocated within the Local Plan and as defined in the Supplementary Planning Document (SPD), Employment section stated many times that all AL5 sites were for small and medium sized units. Unfortunately the Local Plan did not define small and medium sizes at which point West Northamptonshire Council gave guidance to prospective applicants as to the size and type of unit via the SPD. Both of these now form part of the accepted planning documents that the West Northamptonshire Council must use to determine this and future applications.

The SPD indicates that unit sizes of up to 2,000 M<sup>2</sup> for small and up to 8,000 M<sup>2</sup> for medium size. The SPD also that the Furtho Pit site should have small to medium size units only. As defined in the application Unit 1 size is 350,000 ft<sup>2</sup>, this exceeds anything that the Local Plan envisaged and cannot be defined as small to medium under the definitions in the Local Plan.

The Supplementary Planning Document made provisions for large units providing there are exceptional circumstances, however, to our mind this applicant does not appear to make any exceptional arguments, other than those based on commercial grounds to maximise the rental potential of the location.

The Local Plan Part 2 states that access to the site will be via a roundabout from the A508.

The applicant proposal is for a traffic light control junction with traffic only turning right. The Local Highways Authority may accept the proposal as a means of entry to the site, but the applicant's proposal is not for traffic and highway reasons but just to maximise the unit size on the site, as a junction would take much less land than that required by a roundabout, if a roundabout was to be used it would make Unit 1 smaller.

Changing from a roundabout and the Supplementary Planning Document to get a larger Unit 1 combined shows how the applicants are trying to manipulate the Local Policy in the extreme to maximise their rental potential. The Parish Council would also like to point out that the proposed junction does not meet the local Highways specifications.

### **Highway Issues:**

The application did not submit a traffic assessment as required by National Highways to assess volumes of traffic on the junctions, as National Highways stated within their response to this application. These assessments, as we understand, are still being waited for by West Northamptonshire Council. We do understand some amendments have been put forward but these do not mitigate the full extent of the traffic within the application.

Our Parish Council also understand that National Highways have issued a holding directive to prevent determination until they, National Highways, have fully assessed the traffic model.

For many years it has been known that the roundabout on the A5/A508 and Old Stratford is at capacity. The work to upgrade this over the past few years, arguably, has made the situation worse, but it has to be said it is very difficult to see any improvement to the flow of traffic at this point. It is also very difficult to see how this development with hundreds or even thousands of extra traffic movements per day will be able to integrate with existing traffic loads has not been identified. It does not take into consideration extenuating circumstance such as closures of the M1 motorway and all the extra volume of traffic that this will generate.

West Northamptonshire Council's Local Highway Authority have also objected to the application's proposed traffic light controlled entrance to the site on the grounds that there is not sufficient visibility with the proposed design. The Local Highways Authority have also noted in their response that two car parking schemes have been submitted and they have requested that the application is amended to have just one for the formal assessment. The Parish Council believe this has now been done but has not been easy to find.

The application states that 300+ pedal cycle spaces will be provide onsite, the Parish Council suggest that this may be an attempt to argue that there will be reduced vehicle movement on the overloaded roundabout, unfortunately there are NO safe cycle routes in this area. These types of sites attract high numbers of cyclists in close proximity to heavy goods vehicles will be a disaster waiting to happen and a far too a high risk to allow to proceed as proposed. The application must outline, and/or provide the necessary safe cycle routes to and from the site separating the pedal cyclists from the heavy goods vehicles. These cycle routes need to be extended far beyond the application site to the areas where potential employees may live. It is assumed that this will mean linking in with the existing Milton Keynes cycle network and creating routes alongside the A508 and A5 or to the village of Old Stratford roads if the old Buckingham Arm canal towpath is identified as the cycle route.

### **Flooding Issues:**

Some parts of the site sits within a known flood risk, it has been noted by the Parish Council that the experts from the Environment Agency have objected. The applicant's own flood model is showing water potentially 3 to 3.5 meters at times of flooding which the Environment Agency are classifying as "Danger to All" the highest risk category. The Due to this classification the Environment Agency are stating that should this actually occur the Emergency Services would be unable to assist. They are also unhappy with the flood risk, and they are also concerned that two of the proposed units lie in the flood zone areas. The Environment Agency also require plans to mitigate with the risk on site. The Environment Agency are not happy with the design or size of the culvert as it is currently proposed, their concerns are that the new culvert in similarity to the existing culvert will hold back water, whereas a larger culvert will allow the water to pass through the site much more quickly, but it will exacerbate the problem further along the dos-mouth brook to the River Great Ouse.

The Environment Agency objection in place, West Northamptonshire Council cannot ignore the objection. The Environment Agency have already stated that necessary legal steps will be taken if West Northamptonshire Council grant permission for this application would be contrary to the Environment Agency's objection. This would take the form of a formal referral to the Secretary of State for the Environment.

### **Size, Scale and Mass:**

Old Stratford Parish Council understand that the Supplementary Planning Document clearly defines standards for these types of buildings. We would request that West Northamptonshire council are satisfied that all of these standards are being met by the applicant.

Old Stratford Parish Council are greatly concerned in respect of Unit 1, the magnitude of this building running parallel with the A508 will be extremely impactful on it rural location. The applicant must have proper justification as per the Supplementary Planning Document setting out the exceptional circumstances justifying its size, but if justification is proven the impact on the local landscape is too dominate within this rural location. Old Stratford Parish Council feel the size of this warehouse on this site, is overdevelopment.

### **Hours of Working: for those units MUST be included.**

The application seeks to operate the site 365 days per year 24 hours per day. Whilst Old Stratford Parish Council understands that this may be required for the this Mega sized Unit 1, The Parish Council feel it is unacceptable for all those units to overlook residential properties on the Stratford Road. If West Northamptonshire Council are mindful to approve this application, conditions restricting hours of operation.

West Northamptonshire Council MUST be satisfied that 24 hour working on the site does not give rise to noise and light pollution/nuisance, as noise can be heard over greater distances at night, this site MUST be a good neighbour and recognise residential properties nearby.

**Site Facilities:**

The site, as proposed, will have many lorry drivers arriving at all times of the day and night.

Old Stratford Parish Council understand that Northamptonshire is the home of the UK logistics industry for many well-known reasons, which is the driver for this application. The application makes no provision of facilities for the welfare of Lorry drivers. Many of the drivers using this site will legally be required to rest up with drivers sleeping in their cabs. If this site is approved there must be provision of welfare facilities, at a minimum there MUST be shower and toilet facilities along with parking areas.

Old Stratford Parish Council would like to point out that it is a well-known fact that without these facilities problems occur with bottles filled with urine are left in local laybys along with other types of waste disposed of incorrectly. It should be pointed out that it is very easy to blame those who do this but we should look at the root causes. Facilities such as these are woefully short.

**Land Contamination:**

It has been pointed out many times that longstanding residents know that Furtho Pit, at one time was used for landfill. It was filled with a lot of material that could give potential rise to contamination of the surrounding area. The application makes no reference to this and raises the possibility that there may be contamination, however the application does not provide any evidence of this or give methods of remediation.

West Northamptonshire Council needs to ensure that there is a thorough contaminated ground survey of the whole site which is to agreed independent standards before the possibility of and development taking place.

It is understood that there may be vehicle washing areas and underground fuel storage on the site all parties concerned MUST know the details of these facilities and how any potential contamination from the waste wash-off, run-off or spillages will be contained safely within the site.

**Access to the Emmetts Storage Site:**

At present access to Emmetts storage site is via the Old Cosgrove Road. The application seeks to cut this access off for traffic, but retain access for pedestrian use only. This cannot be right or legal as the site is existing.

Should this application be given consent, prior to any work commencing a scheme of how access to Emmett's unit is maintained during construction and then ongoing needs to be a recommencement condition?

**Wildlife Consideration:**

From the submitted documentation Old Stratford Parish Council note that Natural England have no objections to a development of this size. However, local resident with historical and familiarity with the site, over many decades, have seen rare birds, badgers newts and bats in and around this site. There are also annual migratory sand martins nesting on site. This

being said local knowledge is at odds with the professional desktop assessments. Old Stratford Parish Council would ask that West Northamptonshire Council satisfy itself that there are no protected species on the site prior to any development if consented and that proper mitigation measures are put in place.

#### **Country Park:**

The addition of the country park, being just a tidied up area to allow for the landscaping of the balancing ponds the site requires some issues being raised. Who will own the site going forward? How will it be maintained? By whom? Will there be a commuted sum and/or ongoing budgets to pay for continued maintenance of the site.

Some of these issues have been looked into in a recent Technical Briefing issued by Aspect ecology, but they do not specify who, how or when their note would be implemented.

#### **Access to the Country Park is by foot only.**

Old Stratford Parish Council have been informed that access will be by public footpath and Parish owned land, which the applicant wrongly assumes is part of Stony Stratford conservation area. The Parish Council appreciate that there is no vehicle access or parking facilities for people who travel to the country park.

There is no access for maintenance vehicle to carry out essential Country Park maintenance also vehicle access to carry out balancing pond maintenance. No information in relation to these items have been applied to the application.

**Additionally**, in all the documents, original and those amended, the Parish Council owned land known as Oxfield Park, is identified incorrectly as part of the Stony Stratford Conservation Area which is located in the Milton Keynes Council side of the River Great Ouse and the county boundary. Although we have made comment on this before, we now wish this error to be acknowledged by the applicant and the West Northants Planning department and rectified. The idea to divert the footpath RS3 into the housing estate and not to London Road/Oxfield Park Drive exit is also unacceptable.

#### **Summary:**

For all the reasons set out above Old Stratford Parish Council request that West Northamptonshire Council **REFUSE** permission of this application and send a clear message to this and all other applicants that the policies of West Northamptonshire Council will be upheld. The size, scale and ambition of this application is not suitable for this location and should therefore be **REFUSED**.

Yours Sincerely

Old Stratford Parish Council.