

Northamptonshire District

County of Northamptonshire

# Old Stratford Parish Council

11 Chapmans Drive  
Old Stratford  
Milton Keynes  
MK19 6NT

Tel: 07767 854983

FAO: Samantha Taylor  
Planning Department  
West Northamptonshire Council  
The Forum, Moat Lane  
Towcester  
NN12 6AD

17<sup>th</sup> July 2023

Dear Ms Taylor

**RE: WNS/2022/1741/EIA Furtho Pits Old Cosgrove Road Old Stratford**

Further to the OBJECTIONS presented to West Northamptonshire Council in our letter dated 29/03/2023, Old Stratford Parish Council wish to state their continued OBJECTION to the above proposal.

We ask that West Northants Council refuse permission for this development on the basis of our existing objections, which in short included:

- Scale of the overall and individual units and the impact on the local community
- Suitability of the location given the large number of competing developments in the wider area which appear to have better access to major transport infrastructure
- 24 / 7 working proposal which would have a major effect to neighbouring residents
- Wildlife considerations
- Access to country park being non-inclusive

and also in relation to the recently updated 103 documents we would add the following as reasons that West Northants Council should reject this application:

**Flood Risk Assessment:**

Paragraph 5 of the Planning Practice Guidance Flood Risk and Coastal Change advises that “the National Planning Policy Framework sets out strict tests to protect people and property from flooding.....Measures to manage and mitigate flood risk should not increase flood risk elsewhere.”

Flooding has historically been an issue in this area as, during prolonged periods of rain, the culvert under the old Buckingham Arm canal was of insufficient diameter to clear the water quick enough to stop water backing up the Dogs Mouth Brook. If there is a blockage in the sewage pipeline the over burden is released into the Dogs Mouth Brook. The additional surface runoff from the hardstanding of the site will only exacerbate this.

The revised flood mitigation proposal appears to simply enlarge the attenuation ponds within the Country Park. This would increase the risk of large expanses of deep water

within the Country Park and the risk to those who may use the Country Park. It is been noted that the flood modelling submitted does not take into consideration the influence of the River Great Ouse during times of high flows and flood instead concentrating only on the effects of the Dogsmouth Brook.

The proposed country park and a majority of the low-lying areas of Stony Stratford have been subjected to a number of significant flooding events over the last few years, the most recent being on December 24th 2020, in which upwards of 50 homes were flooded. It is therefore of great importance that the impact of the proposed development, new hardstanding and increased surface water runoff into the Dogsmouth Brook is modelled in context of the existing flood risks in the area to minimise impact on the local community. This does not appear to have been adequately considered.

We note the Environment Agency's comments on this matter, expressing their fundamental concerns that following a review of the latest information, their Evidence and Risk reviewer concluded that the latest model is not fit for purpose and have not addressed the fundamental concerns about the proposal which are on the loss of flood volume from the developable site. The mitigation measures have not fully demonstrated where this lost flood volume from pre-development situation to post development situation will be accommodated on site to ensure no increased risk of flooding elsewhere due to this development.

Additionally, it should be noted that the current brick lined culvert has, historically, partially collapsed and it has been unstable for many years. Whilst it is understood that the Buckingham Canal Society aim to re-water this section of the Arm, this brick lined culvert is currently unfit for the purposes proposed.

### **Contaminated Land.**

The National Planning Policy Framework sets out the government's planning policies for England and how these should be applied, providing a framework within which local development plans can be produced. Paragraph 183, Ground Conditions and Pollution – section (c) requires that adequate site investigation information, prepared by a competent person, should be available.

Historically, the "Furtho Pit" was a sand and gravel extraction site. Local knowledge and eyewitness accounts inform us that the land in the pit area is known to have been infilled with chemical process waste from the Deanshanger Oxide works. This chemical waste contains hazardous compounds such as antimony and arsenic.

The reports submitted with the application say that there "may" be some contamination within the site which will have to be removed and make no reference to the sites, which from local knowledge is believed to have been backfilled with waste from Deanshanger Oxide works containing antimony and arsenic. No in-depth procedures have been offered and under the Environmental Protection Act 1990 these mitigation plans MUST be put into place prior to any work being carried out.

In determining the application West Northants Council should ensure that this has been sufficiently investigated and, if found to be present, a suitable remediation or mitigation strategy proposed prior to approval.

**Site Access:**

The original planning application on this site for ACE Plant Hire's relocation was rejected by South Northants Council due to several reasons but, eventually approval was given on the understanding that the applicant installed a roundabout at a new road junction.

As Supplementary Planning Guidance has been developed for this site, the addition of a roundabout was specified as a requirement, ie in the WNC Local Plan Pt 2 for AL5. Initially this requirement was included in the application from Frontier Park. The applicant then resubmitted and the entry to the site had changed to a signal controlled T-Junction, which does not accord with the supplementary planning guidance for the site.

However, we understand this is now being considered as an unsignalled junction with a third lane for queuing to be created. It is unclear how feasible this holding lane would be given the length of HGV and the new legislation permitting HGV's to be up to a further 2 m in length. Also pertinent to this point, a member of our Parish who is a former police traffic accident investigator has calculated that it will take between 17-23 seconds for an articulated vehicle to egress from the junction from a standing start and that does not include getting up to road speed. Without at least a traffic light controlled junction, this will cause a significant hazard to existing road users on this 60mph stretch of road.

It is also somewhat staggering that the applicant can change the site entrance from a roundabout purely so that they can gain extra land allowing the unit running parallel with the A508 to be made larger.

**Pedestrian and Cyclist Access:**

Trawling through this recent raft of documents, it appears that the applicant assumes that pedestrian and cyclist access will be via the Cosgrove Road in Old Stratford through the estate of Oxfield Park and over the A5 foot bridge.

We would state that NO consultation with Old Stratford Parish Council has ever taken place regarding this assumption to use their land for this purpose.

Presently, the existing Cosgrove Road (the section up towards Old Stratford from the Dogsmouth) remains as a publicly accessible cycleway. It is unclear whether this access would remain in the new proposal, potentially resulting in a loss of a cycleway from Old Stratford to Cosgrove without having to use the hazardous main roads.

As the Old Stratford Primary school is currently at capacity attendance, it is possible that children from the village may need to attend the neighbouring school in Cosgrove. The loss of a cycleway to Cosgrove could impact the families safe passage to school.

Paragraph 130 (f) of the National Planning Policy Framework, Achieving Well Designed Spaces should be considered. Whilst a number of new footpaths are proposed as part of the new "Country Park", there appears to be little consideration given to access for people with disabilities, for example vehicular access to the location. The National Planning Policy Framework section 130(f) states that "planning policies and decisions should ensure that developments create spaces that are safe, inclusive and accessible..."

**Bus Stops:**

The applicant assumes that the majority of employees at these units will travel to work on Public Transport. Unfortunately, there is NO public transport to this site at present and other services in the vicinity are being withdrawn as they are not economically viable.

**Employment:**

The applicant has made assumptions that this development will provide the opportunity for large scale employment and will utilise a high level of skill factors. It is common knowledge that the logistics industry is moving towards automatous working practices with robots taking over the role of human operators. If this is to become the norm the employee level would be vastly reduced. The only high level of employment would be for van and HGV drivers of which there is currently a national shortage.

**Wildlife**

Policy BN2 in the WNC Joint Core Strategy Local Plan (Part 1)– Biodiversity, sets out details on how developments will be supported that will maintain and enhance existing designations and assets or deliver a net gain in biodiversity. The Policy specifies that development which has the potential to harm sites of ecological importance will be subject to an ecological assessment and will be required to demonstrate: the methods used to conserve biodiversity in its design, construction and operation; how habitat conservation, enhancement and creation can be achieved through linking habitats; how designated sites, protected species and priority habitats will be safeguarded.

Similarly, the South Northamptonshire Part 2 Local Plan, was adopted in July 2020, Policy NE5: Biodiversity and Geodiversity highlights the importance of conserving and enhancing biodiversity in order to provide “measurable net gains”.

Although the EIA provided with this application has referenced evidence of bats, badgers and reptiles, there are few proposals to conserve the habitat of these species. Instead, the development proposal is reliant upon creation of new habitat, by which point the species will likely have perished or migrated from the area.

Members of the Parish Council have observed all of these creatures in the area and strongly advocate for their protection.

**Visual impact**

The photo montages of the before and after impact for all of the viewpoints marked on the plans appeared to only be shown for certain (beneficial to the applicant) views. It is considered that further photo montages should be requested prior to approval to ensure the visual impact in macro scene is also not as intrusive as is being portrayed at present. It is our opinion that the other views may show a greater visual impact that those which have apparently been selected by the applicant.

**Summary:**

For the reasons set out both above and in our letter of objection dated 29/03/2023, we restate our request that West Northamptonshire Council should REFUSE permission of this application and send a clear message to this and all other applicants that National Planning policies and those of West Northamptonshire Council will be upheld. The size,

scale and ambition of this application continues to be unsuitable for this location and should therefore be REFUSED.

Yours sincerely

Nicky Laurence  
Clerk, Old Stratford Parish Council  
[clerk@oldstratford.org.uk](mailto:clerk@oldstratford.org.uk)