

<b>Application Number</b>	S/2020/2337/MAO
<b>Description</b>	Outline application with all matters reserved except access, for proposed mixed use employment site comprising of Use Class E (g) (Offices, R&D and Industrial Processes), Class B2 (General Industrial) and B8 (Storage and Distribution). To include complimentary uses and associated works.
<b>Location</b>	Podium Business Park, Shacks Barn Farm, A43 Oxford Road, Silverstone

## 1. Executive Summary

Silverstone Parish Council object to this planning application.

Whilst it is understood that the current application is an outline application with all matters reserved except access, the supporting documentation gives an undeniably clear notification by the developer of the intended parameters of the whole.

No permissions for this current application or future applications should be granted until ALL the supporting documentation conforms to both the absolute letter of the Local Plan, specifically Policy AS4 AND its spirit within the parameters of the NPPF.

Further, this letter reflects the vast majority view of the parishioners of Silverstone Parish many of whom have written individually to the Planning Authority.

Summary of comments:

- The proposals would have an unacceptable adverse impact on the village and rural road network due to the increased traffic including HGVs. This would also increase noise and air pollution and decrease pedestrian safety. No mitigation is proposed to alleviate the impact. The Traffic Reports are wholly inadequate and should address cumulative impacts in the local area and appropriate timescales.
- The mix of uses on the site has not been properly assessed with regard to the types of traffic generated and the types of jobs that are likely to be generated.
- The application includes an area of land in open countryside to provide water attenuation and biodiversity. These issues should be addressed entirely within the allocated site AL4. This has resulted in an overdevelopment of the site. There are inconsistencies in the site boundaries shown in the application and supporting documentation.
- The scheme has been prepared without regard to the natural topography of the site and the overdevelopment of the site plus the potential height of the buildings means that no landscaping is proposed to be provided within the boundaries of the site to mitigate the impact on the landscape and provide biodiversity net gain.
- The Heritage impact has not been adequately assessed and harm mitigated against. The impact of the bulk and height of the buildings proposed have not been assessed properly and agreed beforehand and there is no agreed archaeology programme.
- The supporting information is inadequate and does not address the requirements of Policy AL4 of the SNLP2, including submission of a masterplan prior to an application, assessment of impact on historic assets and mitigation, archaeology assessment and mitigation, landscaping assessment and mitigation within and around the boundaries of the site and a market appraisal to determine the mix of uses on the site and phasing.

## 2. Traffic Impact

### HGV's/LGV's

Traffic generated from the proposed development would be damaging to the rural road network and have a severe adverse impact on the residents of Silverstone and the hamlets of the Parish. This unacceptable impact would arise from HGV's and LGV's, noting that the plans for the proposals include multiple HGV loading bays at the large B8 units.

The routes for transmitting HGVs are not comprehensively spelled out in the Travel Assessment. To travel in a southerly direction from the site, there is no direct access from the site onto the A43 southbound. At Paragraph 5.3.6 it acknowledges that 60% of OGV is likely to be travelling south.

For the A43 south (for example to Southampton/Portsmouth) traffic cannot access the A43 southbound directly therefore it will travel through Silverstone on the A413, which is set out in the Travel Assessment but the documents avoids saying that this route will be on village roads, past Silverstone Primary School, over the speed bumps and pedestrian crossing to the A43 junction. Pedestrian safety is likely to be compromised as a result of this increase in heavy traffic.

The route from the site to Milton Keynes and M1 south would be towards Whittlebury on the A413 then left into Cowpastures Lane across country to the A5, then south on the A5 in the MK direction. Cowpastures Lane is a single track road with a bad safety record. This is already a much used rat run for heavy and light commuting traffic bypassing Towcester. At the junction of Cowpastures Lane with the A5, there will be a new roundabout incorporating the new 'Towcester Relief Road' which is proposed as a route which will connect the A5/Cowpastures junction to the A43 just south of Towcester thereby enabling a North-South bypass of Towcester. However, it will be a single carriageway road with 5 roundabouts and Highways England have previously indicated its unsuitability for heavy traffic thereby retaining the A5 through Towcester as the trunk route for HGV's. It should also be noted that the date of completion of all stages of the Relief Road from the A5 junction to A43 remains indeterminate.

### Increased cars

Visitors and employees would also introduce smaller vehicular traffic through the local road network although this would be less likely to be damaging to the fabric of the road network but the additional increase of units deviating from the existing and originally envisaged traffic on the Local Plan allocation site.

Being an outline application there is no definitive mix of uses, all of which will create varying levels of traffic for employees and visitors. Realistically, no one will access the site using sustainable methods of transport, bike riders would be risking injury and worse riding on the road network, and there is no pedestrian access. Rural bus services, even if extended to the site, would be inadequate in terms of times and frequency. Notwithstanding this, the application makes no mention of providing a rural bus service or minibus for potential employees and a Travel Plan should be included with the application.

In terms of parking on the site, it is noted that if all units were to be B2 use, the Transport Assessment states that there is a deficit of 176 spaces. As a precedent the LPA have just turned down application [WNS/2021/0497/FUL](#) on the basis of insufficient parking. Clearly if E1(g) use this would be an even

higher deficit. This illustrates that the current proposals for the site are excessive and that all development and required supporting infrastructure should be within the allocated site boundary.

#### Air and noise pollution from additional vehicular traffic

UK Plan for Tackling Roadside Nitrogen Oxide Concentrations paper:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633270/air-quality-plan-detail.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf). There is increasing evidence that air quality has an important effect on public health, the economy, and the environment. According to Public Health England, poor air quality is the largest environmental risk to public health in the UK. Evidence from the World Health Organisation (WHO) shows that older people, children, people with pre-existing lung and heart conditions, and people on lower incomes may be most at risk.

With a possible 60 HGVs (if there are to be 2 warehouses), on the A413 between 8am and 9pm and an unknown number the rest of the day and night, the pollution (NO<sub>2</sub>, noise) will be immense and may well breach legal limits.

#### Traffic Impact Conclusion

The current planning application would generate significant amounts of both heavy and light traffic, over and above the Local Plan Allocation set out in Policy AL4. Very few residents objected to the original allocation at that time. However, the expanded current proposals represent a significant increase in buildings/activity and traffic and will result in an unacceptable increase in traffic and resultant noise, and air pollution, also significantly decreasing pedestrian safety through Silverstone Village.

Paragraph 85 of the NPPF requires that commercial development in rural areas does not have an unacceptable impact on local roads. The current application is not in accordance with this requirement.

The Transport Assessment is considered to be inadequate and does not set out mitigation strategies for these issues and to reduce impact on the village of Silverstone and the rural road network. We understand that HE has required further comprehensive assessments but that none have been provided despite repeated extensions to the permitted timeframe.

***The application does not accord with the requirements of Policy AL4 of the SNLP2 and the NPPF (paragraph 85.)***

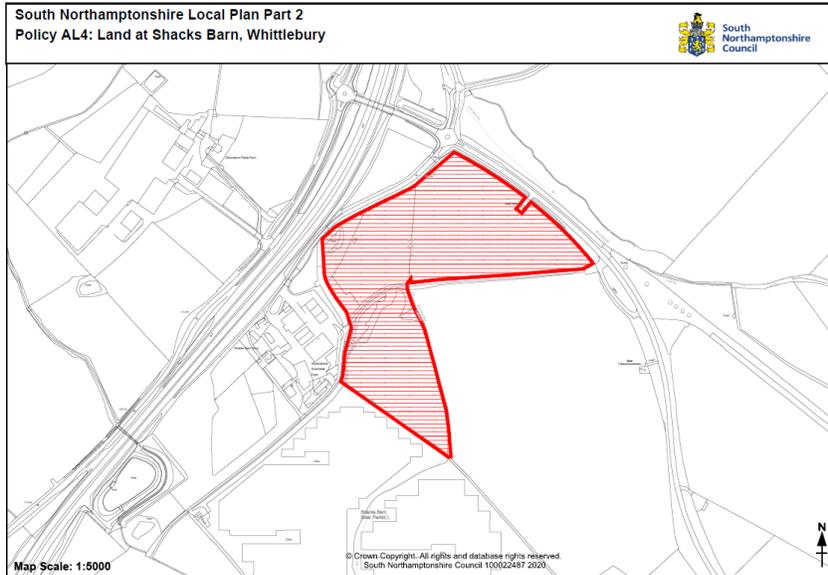
#### Possible Mitigation

- ***Full transport assessment required to ascertain full impact as required by Highways England (in their response dated 26/7/21)***
- ***Reduction in B8 floorspace to a development in line with Local Plan allocation***
- ***Consideration by Highways England of restrictions for southbound traffic requiring larger vehicles to travel north and use the roundabout to then travel south***
- ***Additional traffic calming measures through Silverstone Village discouraging HGV traffic***

### 3. Site Size and plan inconsistencies

#### Site Area

The site allocated in the Local Plan is a single site as below.



The site in the planning application drawing number 216065-PL01 includes this area, but adds a further completely separate parcel of land amounting to almost 30% of the original LP allocated area to the south west, described as attenuation and biodiversity area.

As this site lies outside the Local Plan Allocation and is completely disconnected to the original area, it is wholly unacceptable to include as part of the development. The additional land is not outlined in blue in the application and is not under the control of the applicant.

Accordingly, if planning permission is granted, this could result in no flood attenuation, biodiversity net gain requirements and no landscaping because all these essential elements of the scheme would lie outside the red line of the planning application. All attenuation and biodiversity provision and landscaping should be within the allocated site.

Applying for outline planning permission on both sites is to facilitate denser over development on the allocated site. On this basis alone, the application should be refused.

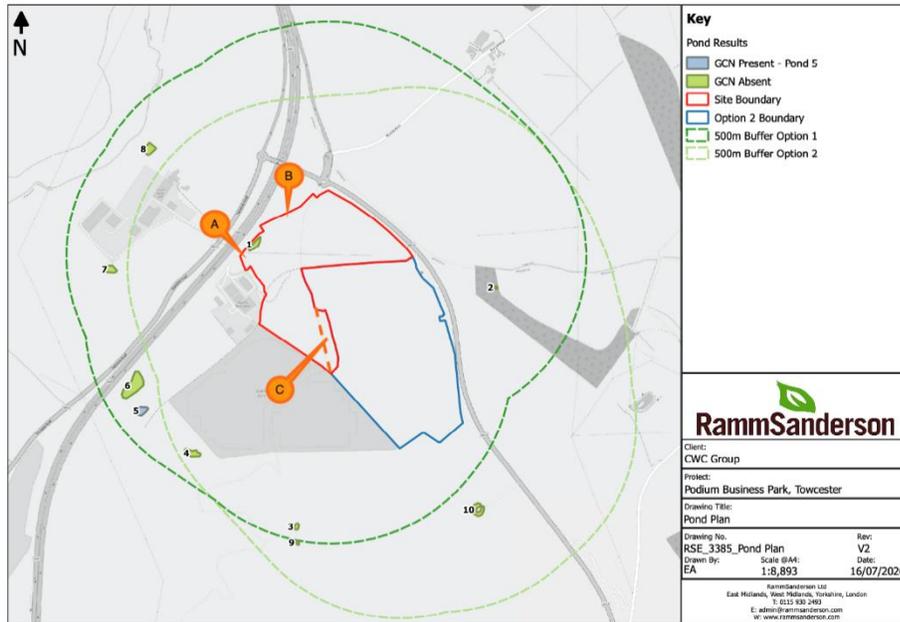
Enlarging the Local Plan allocation is in direct conflict with the wider proportionate strategy for employment development and changes the employment levels per square metre. To approve this will set a precedent for other such sites.

#### Inconsistencies in documentation

Furthermore, there are a number of inconsistencies in various documents submitted in support of the planning application. These have been overdrawn on the plan below which has been reproduced from the Plan RSE\_3385\_Pond Plan.

- Area (A) seems to be a small extra piece, outside the local plan outline

- Area (B) is extra thin slice, as it now includes the road (which needs widening to accommodate extra HGV traffic)
- Area (C) is an extra part that does not appear on all the submitted drawings, but is there on some of them.



### Alternative access

The appended schedule shows an alternative access through the lay-by off the A413. This access and the track to the site are on land which is outside the development site and outside the Local Plan allocation. The boundary to the allocation is to the north of this track. This proposal is therefore not a viable alternative access.

### Option 2 boundary

Finally and importantly, on the Pond Plan, there is shown a much larger Option 2 boundary marked in blue. This suggests future expansion, which, whilst this area is not currently formalised as part of the development, makes the submission even more concerning. More so, in the light of the fact that only the entrance to the site is to be considered in the current outline application, ALL other matters are reserved, including this vast extension to the designated area.

### Site Size and plan inconsistencies Conclusion

***The credibility of the scheme as a whole is undermined by these errors (omissions and inconsistencies) and as it stands, is clearly in conflict with the requirements of Policy AL4 of the SNLP2 and the NPPF***

### Possible mitigation

- ***The scale of the proposal should be reduced so that all the required elements lie within the Local Plan Allocation Site***
- ***The inconsistencies in the submitted planning application should be rectified.***
- ***All references to extending the site must be removed from the documentation.***

#### 4. Landscape impact & biodiversity

The units shown are large in scale and proposed to be up to 15 metres high, in particular the two largest units. The Landscape Visual Assessment does not consider in detail the impact of the size and height of these buildings, merely dismissing the impact as 'low' given that there are few large buildings in the wider vicinity of the site. In particular, there is no assessment of the impact on the residents and visitors to Lordsfield Farm and no proposed landscaping to mitigate this impact. Only by providing a pre-matured landscaping belt within the site itself could this impact be described as acceptable.

There are long distance views of the site from the south/south-west/west within Silverstone Parish. The Local Plan allocation policy states that the layout of the scheme (including unit siting, height, massing) should be influenced by the topography of the land. There is no evidence that this has been an influencing factor and again, there is no space within the allocation site to provide substantial landscaping including trees. NPPF paragraph 85 requires that commercial development in rural areas should be sensitive to its surroundings and this proposal clearly is in conflict with this paragraph.

There is a requirement in the NPPF (2021) that developments should provide a net gain in biodiversity. The figure is likely to be set at 10% in the emerging Environment Bill. A new Biodiversity Metric 3.0 has been provided as a tool to calculate biodiversity losses and gains. (July 2021). There is insufficient land within the control of the applicant to deliver any biodiversity schemes.

#### Landscape impact & biodiversity Conclusion

***The application does not accord with the requirements of Policy AL4 of the SNLP2 nor NPPF Paragraph 85.***

#### Possible Mitigation

- ***Reduce the scale of development on the site to allow landscaping within the boundary.***

## 5. Heritage

Heritage Settings assessment by Cotswold Archaeology is considered inadequate for the following reasons:

- It does not address the proposed height of the buildings which will range from 12-15m height. The Heritage Assessment simply says the development is 'for 10ha of commercial mixed employment, with units ranging in size from 750sq m to 7000sq m, with associated car parking and service yards with a new access road from the existing drive to the Shacks Barn Farm Business Park. The proposed development will appear as an area of commercial land use to the south of the A43, approximately 600m north-west of Lordsfield Farm Moat.'
- No reference is made to the height of the buildings proposed, nor has the document been agreed with the County Archaeological Advisor and Historic England. No consideration has been made regarding the line of the Roman road between Towcester and Alchester nor the archaeological remains identified during the A43 Towcester to M40 Dualling Project.
- It does not refer to the additional 2.81 Ha of 'attenuation land' which forms part of the application.

### Heritage Conclusion

***The application does not accord with the requirements of Policy AL4 of the SNLP2***

### Possible mitigation

- ***The scheme should be started from scratch, taking into the historic environment and any mitigations suggested by WNC.***

## 6. Pre-application Advice has not been met (and the additional site was not included in that proposal)

The application does not follow the pre-application advice given by officers (see in italics below). It is noted that very little of the pre-application advice is referred to in the Design and Access Statement.

Pre-application advice was that the officers were unable to give a view due to the lack of detailed information but the key points were:

### Heritage

The proposed site is located within the setting of the scheduled monument of Lordsfields Farm moated site. The potential impact of development in this location should be assessed to enable understanding of the effect on the significance of the monument prior to any planning applications being submitted, including the potential for non-designated archaeological remains contributing to the significance the scheduled monument that derives from its setting, in consultation with the County Archaeological Advisor and Historic England. Consideration must also be given to the line of the Roman road between Towcester and Alchester to the west of the scheduled area and the archaeological remains identified during the A43 Towcester to M40 Dualling Project.

***These requirements have not been met.***

### Planning Policy

The pre-application report very clearly states that the Planning Policy Department could NOT support this application in its current form. There is both this report and the response to the planning application which are unequivocal in their response and require that ALL (their capitals and underlining) documentation is submitted before they could recommend approval.

Policy AL4 requires for this site:

1. An integrated, coordinated and comprehensive planning approach will be taken and a masterplan must be prepared, in consultation with the District Council, Northamptonshire County Council and other statutory undertakers prior to the submission of a planning application covering the development of the whole site.
2. An independently assessed, market-evidenced proportion of B1 (office), B2 (general industrial) and B8 (storage and distribution) and ancillary uses that are of an appropriate scale and demonstrably complementary to an existing or proposed B class use.
3. Access and Transport a) Access to the site to be based on the existing access only; and b) Provision of new footpaths and cycleways that link to existing networks; and c) Good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel; and d) A transport assessment and travel plan will be required to assess the transportation implications of the proposed development and to identify appropriate mitigation measures
4. Key site specific design and place shaping principles (whole development) in addition to those required under policy SS2 and SDP1, include: a) A detailed heritage impact assessment will be required to be agreed with Historic England, prior to the design of the scheme in order to inform the height of any proposed buildings, layout and extent of the development. This will explicitly

include an assessment of the impact of any development on designated and non-designated heritage assets (with particular reference to the setting of the Lordsfields Farm Moated site) and subject to the assessment being agreed a programme of informed mitigation to be included with any application; and b) Prior to submission of an application, detailed assessment to characterise archaeological remains and identify direct impact of development proposals to inform design and a programme of archaeological mitigation which could involve preservation in situ by design or record or a combination of the two. This to be agreed with Historic England; and c) A detailed strategic landscape assessment of the whole site to deliver a high quality landscaped setting within and around the boundary of the proposal; and d) Appropriate financial contributions to mitigate the impact of the development on services and facilities as required by the council's policies.

***None of these have been met and the Planning Policy Team have asked that they are provided as a comment on the planning application.***

#### Requirements at pre-application stage

The following requirements were set out for the scheme submitted at pre-application stage:

- Phasing of Development. Given the extent of the site, a phased approach to development is proposed and is considered to be appropriate. Despite this, it is considered that the phasing approach would best be determined in accordance with the findings of the independently assessed Market Needs Assessment, as well as other factors, which will influence the most appropriate masterplan layout for the site in its entirety.

#### ***Not submitted with application and no phasing is proposed***

- With the exception of the existing access no provision for secondary accesses is provided for sustainable modes of travel, to promote their use.

#### ***None provided***

- Internal links with the existing Silverstone Business Park are currently poor.

#### ***None provided***

- The site contains a mature, but narrow boundary on its north-eastern boundary, which provides an element of screening from the A413. This boundary would need to be strengthened through the use of appropriate planting.

#### ***Not included***

- The units that are proposed to the north-east of the site are in overly close proximity to the A413, as well as being the most significant in scale. This would unduly impact on the rural character of the area.

#### ***Not addressed***

- There are long distance views of the site from the south / south-west / west. The layout of the scheme (including unit siting, height, massing) should be influenced by the topography of the land.

#### ***No details given - outline***

- Appropriate landscaping would be required to mitigate any visual impact from locations outside and within the development.

***No details given - outline***

- The use of appropriate materials (including colours / shades) and appropriate combinations thereof, can assist in minimising the visual mass and hence the impact of the proposal, on the rural character of the area.

***No details given – outline***

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## 7. Neighbourhood Plan

[Paragraph from Neighbourhood Plan team to be added about negative impact to that plan]

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