PROPOSED INDUSTRIAL/COMMERCIAL BUILDING (USE CLASSES B1, B2 AND B8 & SUI GENERUS) AT DODDINGTON ROAD, (ALSO KNOWN AS HARDWATER ROAD) WOLLASTON

PLANNING STATEMENT
Quality Management

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Appendix A Pre-Application Advice from the Borough Council of Wellingborough
1 INTRODUCTION

1.1 This statement has been produced by RPS on behalf of Daks Property Limited in support of their application for an industrial/commercial building and storage at Doddington Road (also known as Hardwater Road), Wollaston.

1.2 This statement focuses on the general planning policy issues associated with the proposed development. It is intended to assist the Northamptonshire County Council in its determination of the application and has been prepared in accordance with the requirements set out in the National Planning Policy Framework (NPPF). It seeks to evaluate the proposal against national and local planning policies and considers the justification for, and implications of, the proposed development, particularly in relation to its location and setting.

1.3 The statement is structured as follows:

- Section 2 describes the application site and its context together with describing the proposed development.
- Section 3 reviews the relevant policy background, including national and local planning policy.
- Section 4 evaluates the proposed development’s compliance with policies and summarises the findings of other technical reports submitted with the application.
- Section 5 summarises the consultation that has taken place prior to the application formally being submitted.
- Section 6 summarises the key considerations and presents our overall conclusions and the benefits of the proposal.
THE APPLICATION SITE AND THE PROPOSED DEVELOPMENT

Site Description and Location

2.1 The application site is 2.46 hectares in size. It is broadly rectangular in shape and covered in soft-standing and currently used as a horse paddock. There are horse stables located at the southern end of the site near to the entrance. The Wollaston Brook forms the northern and north eastern boundary of the site.

2.2 The site is located approximately 1km west of the village of Wollaston at National Grid Reference (NGR) 489915, 263255. The application site is accessed off Doddington Road (also known as Hardwater Road) to the south. Please see plans reference JPW1350-LVA-001 and JPW1350-001 in the drawings section at the back of this statement.

2.3 Adjacent to the south-western corner of the site lies a disused waste management facility which closed on the 31st May 2017. Adjacent to the south eastern corner is an unoccupied derelict residential property.

2.4 Immediately adjacent to the site to the east is a depot associated with Cammack & Wilcox Ltd, a company that specialises in liquid waste disposal and operates 24 hours a day. Further east is the chemical manufacturer Spectrum Chemicals.

2.5 To the west are open agricultural fields with the Upper Nene Valley Gravel Pits Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar site further west.

Planning History

2.6 The site does not have any previous planning history.

Pre-Application Consultation

2.1.2 The applicant submitted a pre-application enquiry to the Borough Council of Wellingborough on 29th June 2018. Following a site visit on 10th August 2018 the Council issued its pre-application advice which is contained at Appendix A and in June 2019 a planning application was submitted to the Borough Council. However, during the consultation and on further advice from both the borough and County councils, it was agreed that the application would be withdrawn and resubmitted to Northamptonshire County Council as although the application proposal comprises an industrial process it also involves waste products. It was therefore felt that the County Council was best placed to determine the application.

2.1.3 This statement, together with the other application supporting documents, seeks to address the matters raised within this advice and during the previous consultation.

Proposed Development

2.7 The application is for the development of an industrial/commercial building (Use Classes B1/B2/B8 and sui generis) as shown on plan JPW1350-003RevE and JPW1350-004RevC and includes the following:
• Single steel frame building with a plan area of approximately 6,563 m² to include for an office area of approx. 355 m², to be clad in profiled metal coloured dark green;
• Provision for lorry and car parking;
• Hardstanding/low permeable surfacing for storage and site manoeuvrability;
• Site access; and
• Soft landscaping.

2.8 An end user has not yet been found but discussions are underway with a developer and it is envisaged, at the current time, that the building will be used for the sorting, bailing and processing of waste paper and metal and processing of waste plastic into pellets or flakes to make a finished product. As the proposed end user is not confirmed the exact process cannot be detailed but will fall within the B2 use class and will be appropriately conditioned and monitored in terms of any potential impact to amenity.

2.9 It is currently envisaged that there will be around 15-20 employees per shift which will create local employment in the area. Due to the potential nature of this and the fact that the end user is not confirmed at present, the application seeks consent to allow it to operate for 24 hours per day, seven days a week.

2.10 In terms of soft landscaping, it is proposed to mark out and re-instate the footpath along the western edge as per the adopted plan. As such the existing vegetation along the western boundary will be infilled with native trees and species where there are gaps in order to create a robust boundary to the open countryside and an ecological corridor. Please see plan reference JPW1350-005RevA) which sets out the landscape principles plan.
3 PLANNING POLICY CONTEXT

National Planning Policy

3.1 The relevant national planning policy in relation to the proposals is contained within the National Planning Policy Framework.

National Planning Policy Framework (Updated February 2019)

3.2 A revised edition of the National Planning Policy Framework (NPPF) was published in February 2019. The framework must be taken into account in the preparation of local and neighbourhood plans and is also a material consideration in planning decisions. The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

3.3 Two of the objectives of the NPPF were to simplify national planning policy and support and encourage sustainable economic development. Paragraph 11 makes clear that “Plans and decisions should apply a presumption in favour of sustainable development”. It is also made explicit that in making decisions on planning applications this means:

- “approving development proposals that accord with the development plan without delay; and
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
  
  i. the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development; or
  
  ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole”.

3.4 Paragraph 80 says that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt, and that significant weight should be placed on the need to support economic growth and productivity. Paragraph 81 goes on to say that planning policies should, inter alia, be flexible enough to accommodate needs not anticipated in the plan, to enable a rapid response to changes in economic circumstances. Paragraph 82 says that planning policies and decisions should recognise and address the specific locational requirements of different sectors.

3.5 Paragraph 153 in Section 14 says that new development should be expected to comply with local requirements for decentralised energy supply, unless that can be demonstrated to be not feasible or viable, and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption. Paragraph 158 says that development should be steered towards areas where there is a low risk of flooding – although the application site lies within flood zone 2 and 3 the assessment that accompanies the application has confirmed that the majority of the site is at low risk of surface water flooding.
3.6 Paragraph 170 says that the planning system should contribute to and enhance the natural and local environment by, inter alia, minimising impacts on biodiversity and providing net gains in biodiversity where possible. The site has been assessed as having low value in terms of biodiversity and the proposed development is not expected to result in any significant adverse impact in terms of biodiversity. Furthermore, enhancements will be provided through the inclusion of new landscaping and bird and bat boxes.

**National Planning Policy for Waste (2014)**

3.7 The National Planning Policy for Waste ‘NPPW’ was adopted in 2014. It sets out detailed waste planning policy which seeks to deliver the Government’s aims and the objectives of the Waste Management Plan for England ‘WMPE’ (December 2013).

3.8 The document confirms the view that positive planning plays a pivotal role in delivering the Country’s waste ambitions and states this will be achieved through:

“delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy; helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.”

3.9 Waste Planning Authorities are required to consider the likely impact of the proposed development on the local environment and upon local amenity and as such should be assessed against the following criteria:

- Protection of water resources;
- Land instability;
- Landscape and visual impacts;
- Nature conservation;
- Conserving the historic environment;
- Traffic and access;
- Air emissions, including dust;
- Odours;
- Vermin and birds;
- Noise, light and vibration;
- Litter, and
- Potential land use conflict.
Regional Planning Policy

3.10 In terms of Regional policy documents of relevance is the is Northamptonshire Minerals and Waste Local Plan and the local authorities of Corby, East Northamptonshire, Kettering and Wellingborough have joined together to create a joint core strategy for the region.

Northamptonshire Minerals and Waste local Plan (2011 to 2031)

3.11 The NMWLP is the land use planning strategy for both minerals and waste related development within Northamptonshire County. The NMWLP was adopted in July 2017 and covers the period up to 2031.

3.12 Given the dynamic and ever-changing environment that the waste management industry operates in, it is considered that attempting to identify all of the sites (including scale and type of facility) required throughout the plan period would be unwise as it would be overly prescriptive and inflexible. As a result, this may prevent good sites identified outside the plan-making process from being brought forward and developed and stifle innovation and uptake of emerging technologies.

3.13 There are several policies of relevance to this application in the NMWLP these being Policies 10, 11, 12, 18, 19, 20, 21, 22, 23, and 26.

3.14 Policy 10 states:

<table>
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<td>0.26 0.28</td>
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<td>0.01 0.01</td>
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<tr>
<td></td>
<td>Inert recovery / landfill</td>
<td>0.18 0.16</td>
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This provision will come from a mix of extensions to existing sites, intensification or re-development of existing sites and new sites, providing they all meet the spatial strategy for waste management and are assessed as meeting environmental, amenity and other requirements. Allocations for waste development will also contribute to meeting this provision.
3.15 Policy 11 states:

**Policy 11: Spatial strategy for waste management**

Northamptonshire’s waste management network, particularly advanced treatment facilities with a sub-regional or wider catchment, will be focused within the central spine and the sub-regional centre of Daventry. Development should be concentrated in Northampton, Wellingborough, Kettering, Corby and Daventry. Development in the smaller towns should be consistent with their local service role.

Facilities in urban areas should be co-located together and with complementary activities.

At the rural service centres, facilities with a local or neighbourhood catchment will provide for preliminary treatment in order to deal with waste generated from these areas.

In the rural hinterlands only facilities with a local or neighbourhood catchment providing for preliminary treatment, or that are incompatible with urban development, should be provided. Where it is the latter they should deal with waste generated from identified urban areas and be appropriately located to serve those areas.

Facilities in rural areas should, where possible, be associated with existing rural employment uses.

3.16 Policy 12 states:

**Policy 12: Development criteria for waste management facilities (non-inert and hazardous)**

Proposals for waste management facilities (including at existing facilities and extensions to existing facilities) must demonstrate that the development:

- does not conflict with the spatial strategy for waste management*;
- promotes the development of a sustainable waste network and facilitates delivery of Northamptonshire’s waste management capacity requirements*;
- clearly establishes a need for the facility identifying the intended functional role, intended catchment area for the waste to be managed, market base for any outputs, and where applicable the requirement for a specialist facility;
- is in general conformity with the principles of sustainability (particularly regarding the intended catchment area);
- facilitates the efficient collection and recovery of waste materials, and
- where intended for use by the local community, is readily and safely accessible to those it is intended to serve.

Proposals within the Central Spine should also demonstrate how the development affects the overall distribution of Northamptonshire’s waste management network and that it would not result in unacceptable cumulative impacts (resulting from in-combination effects of existing and proposed development) adversely affecting the local area*.

Development should also, where appropriate, and particularly in the case of advanced treatment facilities:

- ensure waste has undergone preliminary treatment prior to advanced treatment;
- integrate and co-locate waste management facilities together and with complementary activities,
- maximise the re-use of energy, heat and residues, and
- maximise the use of previously developed land (particularly existing and designated industrial land, and derelict, despoiled, or brownfield urban land) or redundant agriculture and forestry buildings (and their curtilages).

* Note: Not applicable to sites for integrated waste management facilities allocated under Policy 13.
3.17 Locational hierarchy and catchment area of facilities

3.18 The hierarchy of areas for locating waste management facilities are defined as:

- Central spine – in or related to the principal urban area of Northampton; in or related to the urban areas of Corby, Kettering, Wellingborough and Rushden / Higham Ferrers; in or related to the central spine service centres of Burton Latimer, Irthingborough, Rothwell and Desborough; in or related to other built up local service centres within the central spine between Northampton and Corby.
- Sub-regional centre – in or related to Daventry.
- Rural service centres – in or related to Brackley, Oundle, Raunds, Thrapston and Towcester.
- Rural hinterlands – the rest of Northamptonshire.

3.19 Northamptonshire considers it necessary to implement measures such as the application of specific catchment areas for individual facilities. This approach recognises that cross-boundary movements are likely to occur but should be consistent with enabling waste to be managed and disposed of as close to its source as possible; whilst minimising waste movements where possible.

3.20 Some waste management facilities can have a highly specialised role that means they have a larger catchment area extending beyond the county. Such specialisms need to be addressed so that they are not unnecessarily constrained.

3.21 Proposals must identify the relevant catchment area(s) and demonstrate how this is linked to the waste to be managed on the site; this should be clearly shown on an indicative map to accompany the planning application.

3.22 Catchment areas are to be defined against the following criteria:

National –

- Waste to be managed on site originates from within England or an equivalent geographical area within Great Britain.
- The facility is of a specialised nature specifically relating to the waste to be managed or the nature of the processes involved; on the basis of its specialised role the facility is one of very few of its type nationally (or identified area).
- Waste to be managed does not include untreated / unsorted municipal14, CD&E or green waste.
- The facility supports the waste hierarchy and is not for the disposal of waste, unless disposal forms the last available option.

Regional –

- Waste to be managed on site originates from within the East Midlands or an equivalent geographical area.
- The facility is of a specialised nature specifically relating to the waste to be managed or the nature of the processes involved.
• Waste to be managed does not include untreated / unsorted municipal, CD&E or green waste.
• The facility supports the waste hierarchy and is not for the disposal of waste, unless disposal forms the last available option.

Sub-regional –
• Waste to be managed on site originates from within Northamptonshire or an equivalent geographical area.
• May include a wide variety of waste types including municipal, CD&E and green waste.
• The facility supports the waste hierarchy and is not for the disposal of waste, unless this is the last available option.

Local –
• Waste to be managed on site originates from within up to two adjacent local planning authority areas or an equivalent geographical area.
• The facility is intended to serve either an urban area and its immediate rural hinterland, or be located in a rural area for the purpose of dealing with agricultural and / or similar wastes produced locally.
• The facility should be for preliminary treatment, however in certain circumstances may be for advanced treatment.
• The facility supports the waste hierarchy and is not for the disposal of waste.

Neighbourhood –
• Waste to be managed on site originates from within an urban extension, a commercial or industrial area, or one or more rural settlements in close proximity to one another.
• The facility supports the waste hierarchy and is not for the disposal of waste.

3.23 Policy 18 states:

Policy 18: Addressing the impact of proposed minerals and waste development

Proposals for minerals and waste development must demonstrate that the following matters have been considered and addressed:
• protecting Northamptonshire’s natural resources and key environmental designations (including heritage assets),
• avoiding and / or minimising potentially adverse impacts to an acceptable level, specifically addressing air emissions (including dust), odour, bioaerosols, noise and vibration, slope stability, vermin and pests, birdstrike, litter, land use conflict and cumulative impact,
• impacts on flood risk as well as the flow and quantity of surface and groundwater,
• ensuring built development is of a design and layout that has regard to its visual appearance in the context of the defining characteristics of the local area,
• ensuring access is sustainable, safe and environmentally acceptable, and
• ensuring that local amenity is protected.

Where applicable a site-specific management plan should be developed to ensure the implementation and maintenance of mitigation measures throughout construction, operation, decommissioning and restoration works.
3.24 Policy 19 states:

**Policy 19: Encouraging sustainable transport**

Minerals and waste related development should seek to minimise transport movements and maximise the use of sustainable or alternative transport modes. Where possible minerals and waste related development should be located, designed and operated to enable transport by rail, water, pipeline or conveyor.

Minerals and waste related development should be well placed to serve their intended markets or catchment area(s) in order to minimise transport distances and movements in order to support the development of sustainable communities that take responsibility for the waste that they produce and work towards self-sufficiency.

Proposals for new development or development that would result in a significant increase in transport movements should include a sustainable transport statement to demonstrate how the above has been taken into consideration.

3.25 Policy 20 states:

**Policy 20: Natural assets and resources**

Minerals and waste development should seek to achieve a net gain in natural assets and resources, through:

- protecting and enhancing international and national designated sites,
- delivery of wider environmental benefits in the vicinity where development would adversely affect locally designated sites or other features of local interest,
- protecting and enhancing green infrastructure and strategic biodiversity networks, in particular the River Nene and other sub-regional corridors, and
- contributing towards Northamptonshire Biodiversity Action Plan targets for habitats and species.

Proposals for minerals and waste development will be required to undertake an assessment (where appropriate) in order to:

- identify and determine the nature, extent and level of importance of the natural assets and resources, as well as any potential impacts, and
- identify mitigation measures and / or requirement for compensation (where necessary) to avoid, reduce and manage potentially adverse impacts.

3.26 Policy 21 states:

**Policy 21: Landscape character**

Minerals and waste development should seek to reflect Northamptonshire’s landscape character. Development should mitigate potentially adverse impacts on the local character and distinctiveness of Northamptonshire’s landscape where necessary during the development, operational life, restoration, aftercare and after-use. Opportunities for enhancement should be maximised through restoration, aftercare and after-use.

Proposals for minerals and waste development will be required to undertake a landscape impact assessment (where appropriate) based on the landscape character assessment in order to identify:

- the presence of landscape values (including their nature, extent and level of importance) and determine any potential impacts,
- any necessary measures to mitigate potentially adverse impacts, and
- opportunities to protect and enhance particular features that create a specific aspect of local distinctiveness or character.
3.27 Policy 22 states:

**Policy 22: Historic environment**

Where heritage assets are identified, proposals should seek to conserve and enhance Northamptonshire’s historic environment through:

- careful management of heritage assets, their significance and setting, including the avoidance and / or mitigation of potentially adverse impacts, and
- enhancement of specific features of the historic environment, including individual heritage assets or historic landscapes, as part of the restoration scheme.

Proposals for minerals and waste development involving a site which includes heritage assets (including development within the setting of an asset), particularly those with an archaeological interest, will be required to undertake appropriate desk based and / or field evaluations in order to:

- identify and determine the nature, extent and level of the significance of each heritage asset, the contribution of its setting to that significance, as well as any potential impacts on the asset or its setting, and
- identify the requirement for a programme of post-permission works including any mitigation measures and long-term monitoring.

3.28 Policy 23 states:

**Policy 23: Layout and design quality**

The layout and overall appearance of waste management facilities, and where appropriate minerals development, will be required to demonstrate that the development:

- supports local identity and relates well to neighbouring sites and buildings,
- is set in the context of the area in which it is to be sited in a manner that enhances the overall townscape, landscape or streetscape (as appropriate),
- utilises local building materials as appropriate,
- incorporates specific elements of visual interest,
- builds-in safety and security, and
- reduces fire risk on waste management and disposal sites, having regard to relevant guidance.

3.29 Policy 26 states:

**Policy 26: Sustainable design and use of resources**

New built development should seek to utilise the efficient use of resources in both its construction and its operation through:

- Design principles and construction methods that minimise the use of primary aggregates and encourage the use of building materials made from secondary and recycled sources,
- Construction and demolition methods that minimise waste production, and re-use and recycle materials (as far as practicable) on-site,
- The use of non-primary mineral construction materials, except where there is a need to protect and conserve the existing character of the area, which require traditional building materials (such as building and roofing stone),
- Design and layout that allows the sorting, recycling, biological processing and storage of waste, and
- Supporting the move to a low carbon economy by way of reduced greenhouse gas production through design and layout that incorporates energy and water efficiency, and where appropriate flood mitigation or attenuation measures.
North Northamptonshire Joint Core Strategy (2011 to 2031)

3.30 The North Northamptonshire Joint Core Strategy (NNJCS) outlines the anticipated growth for North Northamptonshire over the period to 2031, including making provision for a minimum 35,000 homes and 31,100 jobs and the necessary supporting infrastructure. The Core Strategy was adopted on 14th July 2016.

3.31 There are considered to be seven policies of relevance to this application in the Core Strategy - Policies 1, 2, 3, 4, 5, 8, and 11.

3.32 Policy 1 states:

**POLICY 1 – PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT**

When considering development proposals the Local Planning Authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area meeting the challenges of climate change and protecting and enhancing the provision of ecosystems services.

To be regarded as ‘sustainable’ within the context of North Northamptonshire, development should contribute to delivering the Plan Vision and Outcomes through compliance with the relevant policies of this Plan. Development that conflicts with policies of the Plan will be refused unless material considerations indicate otherwise.

Where a development is otherwise acceptable but an independent viability appraisal demonstrates that certain policy standards cannot be achieved, the Local Planning Authority will work with the applicant to consider alternative approaches to deliver the desired policy outcomes.
3.33 Policy 2 states:

**POLICY 2 - HISTORIC ENVIRONMENT**

The distinctive North Northamptonshire historic environment will be protected, preserved and, where appropriate, enhanced. Where a development would impact upon a heritage asset and/or its setting:

a) Proposals should conserve and, where possible, enhance the heritage significance and setting of an asset or group of heritage assets in a manner commensurate to its significance;

b) Proposals should complement their surrounding historic environment through the form, scale, design and materials;

c) Proposals should protect and, where possible, enhance key views and vistas of heritage assets, including of the church spires along the Nene Valley and across North Northamptonshire;

d) Proposals should demonstrate an appreciation and understanding of the impact of development on heritage assets and their setting in order to minimise harm to these assets and their setting. Where loss of historic features or archaeological remains is unavoidable and justified, provision should be made for recording and the production of a suitable archive and report;

e) Where appropriate, flexible solutions to the re-use of buildings and conservation of other types of heritage assets at risk will be encouraged, especially, where this will result in their removal from the 'at risk' register.

3.34 Policy 3 states:

**POLICY 3 - LANDSCAPE CHARACTER**

Development should be located and designed in a way that is sensitive to its landscape setting, retaining and, where possible, enhancing the distinctive qualities of the landscape character area which it would affect.

Development should:

a) Conserve and, where possible, enhance the character and qualities of the local landscape through appropriate design and management;

b) Make provision for the retention and, where possible, enhancement of features of landscape importance;

c) Safeguard and, where possible, enhance important views and vistas including sky lines within the development layout;

d) Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by preventing coalescence;

e) Provide appropriate landscape mitigation and/or suitable off-site enhancements; and

f) Preserve tranquility within the King’s Cliffe Hills and Valleys Landscape Character Area (as shown on the Policy Map) and other areas identified in Part 2 Local Plans by minimising light and noise pollution and minimising the visual and traffic impacts of development.
3.35 Policy 4 states:

**POLICY 4 – BIODIVERSITY AND GEODIVERSITY**

A net gain in biodiversity will be sought and features of geological interest will be protected and enhanced through:

- a) Protecting existing biodiversity and geodiversity assets by:
  
  i. Refusing development proposals where significant harm to an asset cannot be avoided, mitigated or, as a last resort, compensated. The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations;

  ii. Protecting key assets for wildlife and geology, in particular the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar Site, from unacceptable levels of access and managing pressures for access to and disturbance of sensitive habitats;

  iii. Protecting the natural environment from adverse effects from noise, air and light pollution;

  iv. Ensuring that habitats are managed in an ecologically appropriate manner;

b) Enhancing ecological networks by managing development and investment to:

  i. Reverse the decline in biodiversity and restore the ecological network at a landscape scale in the Nene Valley Nature Improvement Area (NIA);

  ii. Reverse habitat fragmentation and increase connectivity of habitats where possible by structuring and locating biodiversity gain in such a way as to enlarge and/or connect to existing biodiversity assets such as wildlife corridors;

  iii. Preserve, restore and create priority and other natural and semi-natural habitats within and adjacent to development schemes.

c) Supporting, through developer contributions or development design, the protection and recovery of priority habitats and species linked to national and local targets. Such measures could include the retention of, and provision of areas of open green space, and hard and soft landscaping to address habitat and visitor management.

d) Developments that are likely to have an adverse impact, either alone or in combination, on the Upper Nene Valley Gravel Pits Special Protection Area or other European Designated Sites must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoiding or mitigating against impacts where identified. Mitigation may involve providing or contributing towards a combination of the following measures:

  i. Access and visitor management measures within the SPA;

  ii. Improvement of existing greenspace and recreational routes;

  iii. Provision of alternative natural greenspace and recreational routes;

  iv. Monitoring of the impacts of new development on European designated sites to inform the necessary mitigation requirements and future refinement of any mitigation measures.

A Mitigation Strategy document concerning the Upper Nene Valley Gravel Pits Special Protection Area will be produced, with a view to its subsequent adoption as an Addendum to the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document by June 2016, to support the adopted Joint Core Strategy 2011-2031.

Development proposals will need to take account of the Northamptonshire Biodiversity Supplementary Planning Document, the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document and the JPU Mitigation Strategy for the Upper Nene Valley Gravel Pits Special Protection Area. Where necessary, this will include new residential development contributing towards implementation of this Mitigation Strategy.
3.36 Policy 5 states:

**POLICY 5 – WATER ENVIRONMENT, RESOURCES AND FLOOD RISK MANAGEMENT**

Development should contribute towards reducing the risk of flooding and to the protection and improvement of the quality of the water environment. This will be achieved through the following criteria:

a) Development should, wherever possible, be avoided in high and medium flood risk areas through the application of a sequential approach considering all forms of flooding for the identification of sites and also the layout of development within site boundaries;

b) Development should meet a minimum 1% (1 in 100) annual probability standard of flood protection with allowances for climate change unless local studies indicate a higher annual probability, both in relation to development and the measures required to reduce the impact of any additional run off generated by that development to demonstrate that there is no increased risk of flooding to existing, surrounding properties;

c) Development should be designed from the outset to incorporate Sustainable Drainage Systems wherever practicable, to reduce flood risk, improve water quality and promote environmental benefits;

d) Where appropriate, development should, subject to viability and feasibility, contribute to flood risk management in North Northamptonshire;

e) Following any identified mitigation, development that would lead to deterioration or may compromise the ability of a water body or underlying groundwater to meet good status standards in the Anglian River Basin Management Plan (required by the Water Framework Directive) is unlikely to be permitted;

f) Development will only be permitted where it can be demonstrated that adequate and appropriate water supply and wastewater infrastructure is available (or will be prior to occupation).
3.37 Policy 8 states:

**POLICY 8 – NORTH NORTHAMPTONSHIRE PLACE SHAPING PRINCIPLES**

Development should:

a) Create connected places by ensuring that it:
   i. Connects to the maximum number of local streets, avoiding dead ends, to allow it to integrate into the wider settlement and to connect to existing services and facilities;
   ii. Integrates well with existing cycle, pedestrian, public transport and vehicular movement networks and links to these routes in the most direct and legible way possible, to achieve logical routes;
   iii. Improves or creates open green spaces which tie into the wider network of public green spaces and routes to allow for movement across the settlement through its green infrastructure;
   iv. Provides direct routes to local facilities within or outside the site to create more walkable neighbourhoods; and

b) Make safe and pleasant streets and spaces by:
   i. Prioritising the needs of pedestrians, cyclists and public transport users and resisting developments that would prejudice highway safety;
   ii. Ensuring a satisfactory means of access and provision for parking, servicing and manoeuvring in accordance with adopted standards;
   iii. Ensuring that streets and spaces are continuously enclosed by buildings, or by strong landscaping with well-defined public and private space;
   iv. Ensuring that streets and spaces are overlooked, active, feel safe and promote inclusive access;
   v. Creating legible places which make it easy for people to find their way around; and
   vi. Contributing towards enhancements to the existing public realm such as tree planting to add to the character and quality of the main streets and to encourage walking and cycling.

c) Ensure adaptable, diverse and flexible places by:
   i. Creating varied and distinctive neighbourhoods which provide for local needs through a mix of uses, unit sizes and tenures; and
   ii. Mixing land use and densities within settlements and ensuring that people can move easily between and through them by non-car modes;

d) Create a distinctive local character by:
   i. Responding to the site’s immediate and wider context and local character to create new streets, spaces and buildings which draw on the best of that local character without stifling innovation;
   ii. Responding to the local topography and the overall form, character and landscape setting of the settlement; and
   iii. The creative use of the public realm through the use of measures such as incidental play spaces, bespoke street furniture and memorable features.

e) Ensure quality of life and safer and healthier communities by:
   i. Protecting amenity by not resulting in an unacceptable impact on the amenities of future occupiers, neighbouring properties or the wider area, by reason of noise, vibration, smell, light or other pollution, loss of light or overlooking;
   ii. Preventing both new and existing development from contributing to or being adversely affected by unacceptable levels of soil, air, light, water or noise pollution or land instability;
   iii. Incorporate ecologically sensitive design and features for biodiversity to deliver ‘Biodiversity by Design’;
   iv. Seeking to design out antisocial behaviour and crime and reduce the fear of crime through the creation of safe environments that benefit from natural surveillance, defensible spaces and other security measures having regard to the principles of the ‘Secured by Design’;
   v. Proportionate and appropriate community and fire safety measures; and
   vi. Incorporating flexible and resilient designs for buildings and their settings, including access to amenity space.
3.38 Policy 11 states:

**POLICY 11 – THE NETWORK OF URBAN AND RURAL AREAS**

Development will be distributed to strengthen the network of settlements in accordance with the roles in Table 1 and to support delivery of the place-shaping principles set out in Table 2. The special mixed urban/rural character of North Northamptonshire with its distinctive and separate settlements will be maintained through the avoidance of coalescence.

1. THE URBAN AREAS

   a) The Growth Towns will be the focus for infrastructure investment and higher order facilities to support major employment, housing, retail and leisure development;

   b) The Market Towns will provide a strong service role for their local communities and surrounding rural areas with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town;

   c) Provision will be made for new housing as set out in Policy 28. Any proposals for significant additional growth should be tested and supported through Part 2 Local Plans or Neighbourhood Plans;

   d) The Sustainable Urban Extensions shown on the Key Diagram provide strategic locations for housing and employment development within and beyond the plan period. If it is necessary to identify additional sites to maintain a 5 year deliverable supply of housing land in a district in accordance with Policy 28, these should be identified at the Growth Town followed, if necessary and relevant, by the Market Towns within that district.

2. THE RURAL AREAS

   a) Development in the rural areas will be limited to that required to support a prosperous rural economy or to meet a locally arising need, which cannot be met more sustainably at a nearby larger settlement;

   b) Small scale infill development will be permitted on suitable sites within Villages where this would not materially harm the character of the settlement and residential amenity or exceed the capacity of local infrastructure and services. Part 2 Local Plans and/or Neighbourhood Plans may identify sites within or adjoining Villages to help meet locally identified needs or may designate sensitive areas where infill development will be resisted or subject to special control;

   c) Local and Neighbourhood Plans will identify sites within or adjoining the villages to meet the rural housing requirements identified in Table 5. Other than small scale infilling or ‘rural exceptions’ schemes, development above these requirements will be resisted unless agreed through the Part 2 Local Plan or Neighbourhood Plans to meet a particular local need or opportunity;

   d) Rural diversification and the appropriate re-use of rural buildings will be supported in accordance with Policy 25. Renewable energy developments will be considered under Policy 26. Other forms of development will be resisted in the open countryside unless there are special circumstances as set out in Policy 13 or national policy;

   e) The strategic opportunity for an exemplar sustainable new village community at Deenethorpe Airfield will be explored in accordance with Policy 14.
Local Planning Policy

3.39 The Development Plan covering the area is the Plan for the Borough of Wellingborough (Part 2) up to 2031 (adopted 26th February 2019) and the Wollaston Neighbourhood Plan up to 2031 (adopted July 2016).

Plan for the Borough of Wellingborough (Part 2) (2011 to 2031)

3.40 The Plan for the Borough of Wellingborough is part of the Development Plan forming Part 2 of the Local Plan for the borough following the adoption of the Part 1 North Northamptonshire Joint Core Strategy. The plan has been prepared to help guide future planning decisions in the area.

3.41 In terms of relevant policies, Policy E 3 states:

<table>
<thead>
<tr>
<th>Policy E 3</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Employment Outside Established Employment Estates</strong></td>
</tr>
<tr>
<td>Wherever appropriate, land and premises in industrial and business uses (B1; B2 &amp; B8) will be retained for that use.</td>
</tr>
<tr>
<td>Proposals for change of use or re-development of land and premises currently in industrial or business use (B1; B2 &amp; B8) to other uses will be supported where they satisfy the following:</td>
</tr>
<tr>
<td>A. They accord with the spatial strategy for the borough.</td>
</tr>
<tr>
<td>B. They will not prejudice the current and future operations of adjoining businesses and the site as a whole.</td>
</tr>
<tr>
<td>C. If the land or building is vacant, there is clear evidence that the site/premises has been marketed for a reasonable period of time.</td>
</tr>
<tr>
<td>D. If the existing land or premises has environmental or amenity issues, there is clear evidence that these problems cannot be overcome by an industrial or business use.</td>
</tr>
<tr>
<td>E. The proposal will resolve existing conflicts between land uses.</td>
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</tbody>
</table>

Wollaston Neighbourhood Plan (2011 to 2031)

3.42 The Wollaston Neighbourhood Plan covers the whole of the Parish of Wollaston together with the Wollaston and Strixton Playing Field and that part of the Hinwick Road Industrial Estate located within the adjoining parish of Strixton. The Plan provides a vision for the future of the community and includes planning policies and actions intended to realise this vision.

3.43 Whilst planning applications will continue to be determined by the Borough Council of Wellingborough, the Neighbourhood Plan sets out the local community’s opinion as to where new homes and other land uses should be located. The Plan therefore provides the policy framework for the Borough Council to make decisions on planning applications on behalf of the community. The Plan forms part of the statutory Development Plan for the area and unless material
considerations indicate otherwise, planning applications must be determined in accordance with the policies of the Plan.

3.44 The Neighbourhood Plan has a proposals map which is shown below.

Wollaston Neighbourhood Plan Policies Map
3.45 There are two policies in the Neighbourhood Plan that are considered relevant to the proposals - Policies T4 and E1.

3.46 Policy T4 states:

**Policy T4. Superfast broadband**

Planning permission for new developments will be subject to a condition requiring the provision of ducting to allow for the provision of fibre optic cable into each individual premises.

3.47 The site itself is allocated in the Neighbourhood Plan under Policy E1 which states:

**Policy E1. Land adjacent and to the rear of the Recycling Centre, Doddington Rd.**

Land at Doddington Road, as shown on the Policies Map, is allocated for employment (B1, B2 and B8 uses). Proposals must:
1. demonstrate that the development will be safe for its lifetime, will not increase flood risk elsewhere, and, where possible, will reduce flood risk overall;
2. not have a significant impact on heritage assets;
3. provide satisfactory measures, where necessary, to improve connectivity for pedestrians and cyclists between the site and the village of Wollaston;
4. include, where necessary, satisfactory measures to ensure that proposals will not have an unacceptable impact on highway infrastructure;
5. include, where necessary, measures to remediate land contamination to ensure that the site can be safely developed without significant impact on future users or the environment;
6. not give rise to any unacceptable impacts on the amenities of the occupiers of the neighbouring residential property or prejudice the operation of the recycling centre;
7. deliver biodiversity and green infrastructure enhancements associated with the Wollaston Brook; and
8. include measures to minimise the visual impact of the development on the countryside.

**Supplementary Planning Guidance**

3.48 Other local supplementary planning policy documents of relevance are:

• Northamptonshire Parking Standard (2016)
• Sustainable Design (2009)
• Biodiversity (2015)
• Trees on Development Sites
4 PLANNING ASSESSMENT

Introduction

4.1 As highlighted in the previous section, the national, regional and local policy context, including the Neighbourhood Plan, is supportive of the development of B1, B2 and B8 uses on the application site and therefore a presumption in favour of the proposal exists. However, the planning policy context of the site also indicates that the planning application must consider the following issues:

- Landscape
- Flood Risk
- Ecology
- Amenity and Noise
- Access and Transport
- Air Quality
- Heritage
- Environment Risk Assessment (Contamination)
- Catchment Area

4.2 Consideration of these issues, with reference to the specific technical reports that support the planning application, is set out below.

Landscaping

4.3 A landscape and visual assessment (LVIA) has been undertaken and, in line with recommendations contained within the pre-application advice, mitigation measures have been proposed to ensure that any impacts are acceptable.

4.4 A new ecological corridor in association with the marking out and re-instating the line of the PRoW will be created along the western boundary, including new infill planting of native trees and hedgerows where there are gaps in the existing field boundary vegetation, in order to create a robust boundary with the open countryside to the west. The root protection areas of the existing trees will not be encroached upon. The building will be clad in profiled metal coloured dark green as per the site adjacent in order to blend into the local landscape.

4.5 The topography of the application site is low-lying and, as such, when combined with the retention and enhancement of the boundary trees and hedgerow features, will result in minimal impact on the surrounding landscape. Whilst the paddock will be replaced by the proposed building its impact will be localised and specific to the application site only. Consequently, it is considered that the overall effect on landscape features and elements will be of minor significance.

4.6 The LVIA also confirms that even though national and regional landscape characters collectively are considered to be of high/moderate sensitivity, the magnitude of the impact of the scheme will be negligible due to the low-lying nature of the proposed development and local topography,
combined with the retention and enhancement of the boundary vegetation. As such, with a high/medium sensitivity and a negligible magnitude of impact, the overall effect on the landscape character will be of minor significance.

4.7 The LVIA also confirms that the mitigation planting proposed will provide long term management and enhancement of the existing vegetation along the field boundaries, providing a strong landscape framework to absorb the visual impacts on the wider landscape character. Consequently, the proposed development will only have a localised effect which would be contained within the site itself, with little adverse effects upon the wider landscape context and character. As a result of the low level of landscape and visual impact, together with the proposed retention and enhancement of the existing landscape features and their ecology value, the scheme is considered to fully accord with planning policies 18, 20 and 21 of the NMWLP and policies 3, 4 and 8 of the NNJCS and Policy E1 (7 & 8) of the Neighbourhood Plan.

**Flood Risk and Drainage**

4.8 A Flood Risk Assessment (FRA) and Drainage Strategy was undertaken for the site. It concludes that the site is located in Flood Zone 2 and 3 risk of flood rivers or seas and from surface water. Land / surface, groundwater and artificial sources are considered to present low risk of flooding to the site.

4.9 A comparison of the existing ground level and the worst case flood level indicates that 46.5m is acceptable to use as a worst case flood level across the site in the 100 year Annual Exceedance Event including a 40% additional allowance for climate change.

4.10 As a result, the development of the site has been designed in such a way that the floor level of the building/yard are higher than 46.5m to ensure that the building is free from river and surface water flooding.

4.11 Attenuation storage has been provided for on-site to mitigate the flow rate of the clean and contaminated surface water runoff discharges.

4.12 The level of the proposed development together with the proposed surface water storage system and flow control system should ensure that no flooding occurs within the proposed development caused by the proposed system for up to and including a 1 in 100-year return period +40% climate change.

4.13 The FRA and Drainage Strategy therefore illustrate that whilst some of the application site is at risk of flooding, following the incorporation of appropriate mitigation measures the proposed development will meet the requirements of the NPPF and Planning Practice Guidance and is considered to accord with policy 18 of the NMWLP and Policy 5 of the NNJCS and Policy E1 (1) of the Neighbourhood Plan.

**Ecology**

4.14 A Preliminary Ecological Appraisal (PEA) has been undertaken following appropriate guidance.

4.15 The PEA identified eight statutory designated sites within 5km of the site and 16 non-statutory sites within 2km of it. These comprised one Ramsar site, five Sites of Special Scientific Interest (SSSIs), one Special Protection Area (SPA), one Local Nature Reserve (LNR), ten Local Wildlife Sites (LWS), five Potential Wildlife Sites (PWS) and one Pocket Park.
4.16 During construction there will be the establishment of a Construction Exclusion Zone (CEZ) within the root protection area for all trees and hedgerows.

4.17 Any external lighting around the building, yard, car parking or along the access road will be positioned and directed away from site boundaries and these measures can be secured via an appropriately worded planning condition attached to any consent granted.

4.18 The developable area that is proposed has been developed with ecological constraints in mind (see the Design Evolution section of the Design and Access Statement). As part of the development, site enhancements are also proposed, including wildlife planting which is to be integrated into the landscaping and bird nesting bricks/boxes together with bat roosting boxes. It is considered that with these mitigation measures in place, the proposed development meets the requirements of the relevant policies relating to habitat protection, creation and enhancement namely policies 18, 20 and 21 of the NMWLP and Policies 4 and 8 of the NNJCS and Policy E1 (6 & 7) of the Neighbourhood Plan.

4.19 When the original application was submitted the Northamptonshire principal projects officer (ecology) advised of the following:

- From the ecology survey report provided the biodiversity impacts should be minimal provided the following:
  - A badger survey will need to be done if the site layout changes;
  - A construction environment management plan (CEMP) should be conditioned, in particular it should identify the fencing and Construction Exclusion Zones required to protect the hedgerow, the large ash tree (which has high bat roost potential), and the brook;
  - A lighting scheme should be conditioned: this will need to consider the recommendations in section 4.27-4.29 of the ecology report (with regards to bats);
  - The north elevation is not shown on drawing JPW1350-004RevB: this should not have any windows in accordance with section 4.26 of the ecology report;
  - Recommend that the landscaping scheme be conditioned to ensure the new planting achieves as much biodiversity gain as possible;
  - Support the ecologist’s recommendations that swift and bat boxes be installed on site. Recommend two swift boxes be mounted on the north side of the building, and two bat boxes (recommend self-cleaning models) be installed on trees. These could be included in the landscaping scheme to ensure they are positioned appropriately.

4.20 The above recommendations have either been incorporated into the design or are acceptable as conditions.

Crime, Amenity and Noise

4.1.2 The proposals have been designed in line with the industrial and commercial development section of the Council's Planning Out Crime Supplementary Planning Guidance (SPG) by having a secure perimeter boundary using a 2.4m weld mesh fence and only one entry point together with locating a portion of parking close to the entrance. Other measures are set out in the Design and Access Statement. In view of the proposed design and layout, it is considered that the
development will protect the security of the occupants in accordance with Policy 23 of the NMWLP and Policy 8 (e) (iv) of the NNJCS.

4.1.3 It is the intention of the applicant to conduct its activities in such a way that the impact on the environment during design, construction and operation of the site is minimised. These include impacts on noise and the amenity of the surrounding area. The application is accompanied by a noise assessment which outlines mitigation measures to be employed at the site in order to impacts.

4.1.4 The most effective form of mitigation is to design the project to avoid environmental impact. The proposal has been designed as far as practicable to minimise environmental impact and enhance parts of the environment.

4.1.5 In order to ensure that required standards are maintained during the construction and operational phases a Construction Environmental Management Plan (CEMP) will be drawn up which will cover various aspects such as noise, air quality, as agreed with the planning authority. It is expected that the provision of a CEMP will be required via a suitably worded condition attached to any planning consent.

4.1.6 In view of the mitigation measures it is considered that the development will not give rise to any unacceptable impacts in terms of amenity or noise and conforms with Policy 18 of the NMWLP and Policy 8 of the NNJCS and Policy E1 (6) of the Neighbourhood Plan.

Access and Transport

4.21 A Transport Statement (TS) has been prepared. The pre-application advice (PRE/18/00100/PREF) obtained from Wellingborough Borough Council included a response from the local highway authority (LHA) at Northamptonshire County Council (NCC) and a separate subsequent pre-application discussion was held with NCC.

4.22 The development is proposed to consist of approximately 6,563m² of B1(Office), B2 (Industrial) and B8 (Warehouse) uses. The TS was undertaken on the assumption that there will be a 10/45/45 split for those uses, as below:

- B1 – Offices: 656m²;
- B2 – Industrial: 2,953m²; and
- B8 – Warehouse: 2,953m².

4.23 Swept path analysis has been undertaken and shown to demonstrate that both a variety of size of vehicle can access the site and that an appropriate level of parking can be accommodated.

4.24 The TS confirms that the site will attract approximately 34 two-way vehicular trips in the am peak hour and 32 two-way trips in the pm peak hour; this equates to one vehicle every two minutes during the peak hours. This is not considered to have a significant impact on the local highway network. However, this is the worst case and as the TS sets out using the proposed end user with approx. 13-15 vehicles and generating two two-way HGV movements per hour which is considered to have no impact on the local network and much reduced in comparison to the robust case. The TS also concludes that the proposed development has satisfactory access arrangements that can be accommodated without detriment to the existing safety or operation of
the local highway network. It is concluded overall, therefore, that there are no valid transportation reasons why the development should not be allowed.

4.25 Therefore, the scheme is considered to accord with the National policy and Local Policy 18 and 19 of the NMWLP and Policies 1, and 8 of the NNJCS and Policy E1 (3 & 4) of the Neighbourhood Plan.

Air Quality

4.26 An Air Quality assessment has been undertaken to accompany the original planning application. It considers the air quality impacts from the construction phase and once the proposed development is fully operational.

4.27 Impacts during construction, such as dust generation and plant vehicle emissions, are predicted to be of short duration and only relevant during the construction phase. The results of the risk assessment of construction dust impacts undertaken using the IAQM dust guidance, indicates that before the implementation of mitigation and controls, the risk of dust impacts will be low. Implementation of the mitigation measures described in the IAQM construction dust guidance will reduce the residual dust effects to a level categorised as “not significant”.

4.28 Regarding the operational impact, detailed atmospheric dispersion modelling has been undertaken for the first year in which the development is expected to be fully operational, 2024. The impact on existing receptors in the local area is predicted to be ‘negligible’ taking into account the changes in pollutant concentrations and absolute levels. Using the criteria adopted for the assessment together with professional judgement, the overall impact on the area as a whole is described as ‘negligible’.

4.29 The resulting air quality effect of the proposed development is therefore considered to be ‘not significant’ overall and as such accords with Policy 18 and 22 of the NMWLP and Policy 8 of the NNJCS and Policy E1 of the Neighbourhood Plan.

Heritage

4.30 As a consequence of the pre-application advice received, the applicant’s heritage advisors (CgMs) met Liz Mordue from the County Archaeology Service on site on 17th January 2019. The site visit confirmed that there was no visible ridge and furrow cultivation evidence visible on the site and therefore no further survey was required.

4.31 A geophysical assessment of the site was undertaken on the 1st March 2019 and is submitted with the application. The assessment confirms the low archaeological potential within the site and the County archaeologist has confirmed that no further evaluation is required prior to determination. A small amount of trenching maybe required to ground truth this conclusion, but this can be secured via an appropriately worded planning condition attached to any consent granted.

4.32 It is considered that the proposal accords with Policy 2 of the NNJCS and Policy E1 (2) of the Neighbourhood Plan.
Environment Risk Assessment

4.33 A Phase 1 Desktop Study (DTS) and Preliminary Risk Assessment (PRA) report was commissioned and undertaken to support the proposed development. The purpose of the assessment was to assess the potential for the presence of ground contamination at the site and its immediate vicinity as a result of former and current land uses. The assessment also presented a preliminary review of potential geotechnical issues.

4.34 A Conceptual Site Model (CSM) was developed to quantitively assess potential contaminant pollutant linkages identified at the site. The CSM has identified that the risk to human health should be considered low to moderate based on adjacent land use presenting a plausible risk of shallow contamination. The risk to controlled waters is considered low based on the rural setting of the area, distance from abstractions and low groundwater sensitivity. The risk from ground gas is considered to be low to moderate based on viable gas sources (Alluvium and localised volatile contamination from surrounding land uses).

4.35 Therefore, it is considered that the proposal accords with Policy E1 (5) of the Neighbourhood Plan.

Catchment Area

4.36 As an end user for the site has not been confirmed and following discussions with the planning officer at Northamptonshire County Council, we have produced an indicative catchment area plan for discussion with a more formalised one being done via a pre-commencement condition.

4.37 The catchment plan shown on drawing JPW1350-CATCH-001 extends along the M1 down to M25 and to the north west to Coventry. This catchment area would be similar to that of a sub-regional facility as identified in the Development and Implementation Principles SPD.

Fire and Safety

4.38 The full and final design of the building and drainage strategy have not been finalised however, due to the nature of the material and storage on site it will be necessary to obtain approval for a Fire Protection Plan from the Environment Agency. The site layout has accommodated space for a sprinkler tank and associated pump house. The FPP will be approved as part of the Environmental Permit submission for the site.
5 STATEMENT OF COMMUNITY INVOLVEMENT

Introduction

5.1 Public consultation is required as part of the application process, application validation checklist and also outlined within the pre-application consultation response from the Council.

Consultation with Wollaston Parish Council

5.2 As suggested in the pre-application response, on 31st May we initially contacted Wollaston Parish Council on how best to promote and detail the proposal. The Parish Council suggested that we email them with the proposals and drawings, so they could initially review their content.

5.3 On the 10th June the Parish Council was sent a detailed description of the proposed development together with numerous plans to aid them in having an understanding on what is proposed at the site. The Parish Council, on 12th June, replied to say that the proposals will need to be brought forward to the full Parish Council meeting held on 20th June.

5.4 On the 21st June the Parish Council informed us that the proposals were presented to the council meeting and that before any comments could be made they required more detail on the following:

- 1/ The actual recycling process that will take place
- 2/ Number of anticipated employees
- 3/ Anticipated lorry / vehicle movement
- Does your client have other similar businesses in this area available to visit?

5.5 An email was sent to the Parish Council on 27th June detailing the applicant’s response to the questions raised. As at 3rd July, no further communication from the Parish Council had been received and therefore a decision was made to submit the application and address any further comments during the consultation process.

5.6 The application however was withdrawn but is essentially the same application with minor amendments following the planning consultation process. No further public consultation was deemed to be required.
6 CONCLUSIONS AND BENEFITS OF THE PROPOSED DEVELOPMENT

6.1 The proposal is to develop an industrial/commercial building including:

- Single steel frame building with a plan area of approximately 6,563 m² including office space, to be used for sorting, bailing and processing of paper, plastic and metal into pellets or flakes to make a finished product;
- Provision for lorry and car parking;
- Hardstand/low permeable surfacing for storage and site manoeuvrability;
- Site access; and
- Soft landscaping.

6.2 It is envisaged at the current time that the building will be used for the sorting, bailing and processing of waste paper and metal along with the processing of waste plastic into pellets or flakes to make a finished product.

6.3 The proposal will not irretrievably damage the local landscape and, indeed, will provide a number of enhancements with regard to tree and hedgerow planting. It will not cause harm to the local amenities of the area with regard to access, dust, noise and groundwater and safety issues. As such the proposed development fully accords with national, regional and local planning policy and there is no reason why planning permission should not be granted.

6.4 In addition to the above, it is also considered that the proposal will have the following benefits:

- It will provide an economic boost to the area both during construction and operation
- It will provide a valuable recycling and processing facility for the area
- It will provide additional ecological enhancement to the area
- It will provide an opportunity to retain and enhance the PRoW by incorporating it into a landscaped corridor.
- It will provide infill planting to enhance the boundary treatment.
Notes:
1. This drawing has been prepared in accordance with the scope of RPS’s appointment with its client and is subject to the terms and conditions of that appointment. RPS accepts no liability for any use of this document other than by its client and only for the purposes for which it was prepared and provided.
2. If received electronically it is the recipient’s responsibility to print to correct scale. Only written dimensions should be used.

Legend
- Site Boundary
- 2.5km
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Car Parking Area OPTION 1:
- 20 Car spaces
- 2 Disabled Car Parking Spaces
- 3 Electric Vehicle Parking Spaces
- 2 Motorcycle Spaces
- 10 Push Cycles
- 2 HVG Artic Parking Spaces

AREA FOR BIO RETENTION SYSTEM
ALSO POSSIBLE AREA FOR CAR PARKING SUBJECT TO DESIGN
Approx: 6,563m²

Car Parking Area OPTION 2:
- 20 Car spaces
- 2 Disabled Car Parking Spaces
- 3 Electric Vehicle Parking Spaces
- 2 Motorcycle Spaces
- 10 Push Cycles
- 2 HVG Artic Parking Spaces

Sprinkler Tank (subject to final design)
Pump House (subject to final design)
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Legend

- Indicative Catchment Area

Notes:
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Playing CARDIFF

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Appendix A

Pre-Application Advice from the Borough Council of Wellingborough
I write in relation to your recent pre-application enquiry dated 29 June 2018 in relation to the above site.

Your pre-application enquiry seeks advice on the development of single steel frame building with a plan area of approximately 7000 square metres and would be served by a new vehicular access road from the north of the site off Doddington Road. The proposed building would be used for B1, B2 and or B8 purposes. The enquiry was accompanied by a site location plan outlining the site in blue and indicating the location of a building, service yard and parking. A site meeting was held on Friday 10 August 2018.

Consultations have been carried out with Northamptonshire highways, Northamptonshire archaeological advisor, Northamptonshire ecological officer, Northamptonshire police, Natural England, the council’s planning policy officer and the council’s landscape officer would comment as follows:

**Conformity with the Development Plan**

Section 38(6) of the Planning & Compulsory Purchase Act 2004 replaces section 54(A) of the Town & Country Planning Act 1990 and states that if regard is to be had to the development plan for the purpose of any determination under the Planning Act, the determination must be made in accordance with the plan, unless material considerations indicate otherwise:

The development plan for the purposes of this statutory provision comprises:

- The North Northamptonshire Joint Core Strategy (JCS);
- Borough of Wellingborough Local Plan (LP)
- The Borough of Wellingborough Local Plan – Consultation Plan (ELP)
- Wollaston Neighbourhood Plan (WNP)
The relevant policies in the JCS are:

Policy 1 (Presumption in Favour of Sustainable Development);
Policy 2 (Historic Environment);
Policy 3 (Landscape Character);
Policy 4 (Biodiversity and Geodiversity);
Policy 8 (North Northamptonshire Place Shaping Principles);
Policy 11 (The Network of Urban and Rural Areas);

The relevant policies in the WNP are:

Policy E1 (Land adjacent and to the rear of the Recycling Centre, Doddington Rd.); Policy T4 (Superfast Broadband);

Supplementary Planning Documents/Guidance
Sustainable Design
Biodiversity
Trees on Development Sites
Planning Out Crime in Northamptonshire
Parking

Principle
Policy 11 of the JCS allows neighbourhood plans or part 2 plans to identify sites within or adjoining villages to meet local needs and as such the site is an allocation in the adopted WNP for B1, B2 and B8 uses. The principle of development in this location for employment purposes has been established. Any proposed development should still be prepared in accordance with relevant policies in the JCS and the site specific policy in the WNP.

Policy E1 of the WNP sets out the criteria against which proposals for this allocated site should be assessed. Proposals for the site must therefore:

- demonstrate that the development will be safe for its lifetime and that it will not increase flood risk;
- not have a significant impact on heritage assets;
- provide connectivity improvements between the site and Wollaston by walking and cycling;
- not have an unacceptable impact on highway infrastructure;
- remediate land contamination;
- not unacceptably impact on local amenity for neighbouring residents or businesses;
- provide biodiversity and green infrastructure enhancements;
- minimise the visual impacts of the development on the countryside;

Any outline or detailed planning application should be prepared in accordance with this policy.

Effect on the Historic Environment
JCS policy 2 (d) requires that where proposals would result in the unavoidable and justifiable loss of archaeological remains, provision should be made for recording and the production of a suitable archive and report. Policy E1 of WNP seeks developments not to have a significant impact on heritage assets.

The site lies to the west of the A509. The county Historic Environment Record (HER) indicates that the site contains ridge and furrow earthworks, though it is difficult to tell from modern aerial photographs how well preserved these are. The HER also records a number of crop marks in the fields to the south, including a small enclosure which may be prehistoric in date.
There is therefore the potential for archaeological remains to be present as well as the significance of the ridge and furrow to be considered. Your client should provide an assessment of the condition of the ridge and furrow, and an archaeological field evaluation comprising geophysical survey and trial trenching (the trial trenching to include provision for reinstatement of the ridge and furrow once completed) with any outline or detailed planning application. This is in accordance with the revised NPPF paragraphs 189 and 190 and is also referred to in the neighbourhood plan.

If you have any queries in relation to the above content please contact Liz Mordue (Northamptonshire archaeological advisor) on 01604 366 192 or email lmordue@northamptonshire.gov.uk

Landscape Character
Policy 3 (a) of the North Northamptonshire Joint Core Strategy attempts to ‘conserve and, where possible enhance the character and qualities of the local landscape.’ Policy E1 of WNP seeks developments to minimise the visual impacts if the development on the open countryside.

The northern rear boundary of the site borders a tree lined water course which the council’s landscape officer considers to provide a strong boundary with the open countryside before the land rises towards the A509. The site is effectively visually contained on the Wollaston side. There is also a strong tree line on the other boundary towards Great Doddington. The highway boundary is defined by the redundant recycling centre on the western side and a disused former office on the eastern side and a hedge containing hawthorn and elm in between. The elm is afflicted with Dutch elm disease. The meadow is currently being grazed by horses. The boundary with the adjacent site was to be of environmental benefit and linkage should be considered. From a visual landscape point of view the scale, form and design of any proposed development should minimise the visual intrusion on the existing landscape and include the provision of environmental benefits and enhancements.

The site’s position within a rural setting means any outline or detailed application would need to be accompanied by a landscape and visual impact assessment and a detailed tree survey including any tree mitigation measures.

Biodiversity and Geodiversity
The JCS at policy 4 - biodiversity and geodiversity, sets out policy requirements for the protection and where possible, a net gain in biodiversity. Policy E1 of WNP seeks developments to provide biodiversity and green infrastructure enhancements.

Protected Species
An ‘Extended Phase 1 Habitat Survey’ to evaluate the grassland on the site so any biodiversity impacts can be identified and mitigated. There is potential for bats, snakes, newts, badgers and nesting birds to be found on the site. If bats, snakes, newts, badgers or nesting birds are found then details of mitigation measures including any licences should be provided.

Biodiversity Enhancements
The NPPF at chapter 15 ‘conserving and enhancing the natural environment’ sets out government views on minimising the impacts on biodiversity, providing net gains where possible and contributing to halt the overall decline in biodiversity.

An on-site biodiversity enhancement plan should accompany any planning application which includes mitigation measures such as the planting of native species, the provision of opportunities for nesting bats and birds such as bird/bat boxes or bricks.
**Flood Risk and Surface Water Drainage**

The JCS at policy 5 sets out a raft of sub policies aimed at preventing or reducing flood risk. Policy E1 of WNP seeks developments to demonstrate that the development will be safe for its lifetime and that it will not increase flood risk.

The revised NPPF at chapter 14 sets out government views on how the planning system should take into account the risks caused by flooding. The planning practice guidance under the chapter titled 'flood risk and climate change' gives detailed advice on how planning can take account of the risks associated with flooding in the application process.

Even if the application site lies within flood zone 1 defined by the Technical Guide to the National Planning Policy Framework (NPPF) as having a low probability of flooding from rivers. The proposed development may present risks of flooding on-site and/or off-site if surface water run-off is not effectively managed. Footnote 50 of paragraph 163 of the revised NPPF requires applicants for planning permission to submit an FRA / Drainage Strategy for all the “Major Development” (1000 square metres) that is proposed in such locations. A surface water drainage Strategy / FRA will be vital at the time of submitting a Formal Planning application.


On this page you will also find information on how to use the Technical Flood Advice Service, for which there is a charge. Your client will need to submit a Technical Flood Advice request form ([http://www.floodtoolkit.com/planning/technical-flood-advice-service/](http://www.floodtoolkit.com/planning/technical-flood-advice-service/)) detailing what advice you require. After which the cost of providing this advice will be able to be determined. Following receipt of the above completed advice form, an officer at the Lead Local Flood Authority will contact your client to discuss the advice you want and prepare an agreement that is made up of an offer letter, a programme, and our standard terms and conditions. The programme will specify the tasks the Lead Flood Authority will carry out, giving the approximate timetable and an order of cost for their advice. A rate of £84 per hour is charged, for planning advice agreements.

**Design, Layout and the Effect on the Character and Appearance of the Surrounding Area**

JCS at policy 8 (d) (i) and (ii) describes the principles that proposed development must take into account with regards to its effect on the character and appearance of an area.

The northern, eastern and western boundaries of the site are bound by trees and vegetation. Part of the eastern boundary closest to Doddington Road is bound by the flank elevation of a former brick office building. There is a vehicular access crossing onto the site from Doddington Road. The overall scale, form and layout of any proposed building will be determined by the distance required to be kept from any boundary trees, parking, servicing and sustainable urban drainage system required to serve the development. The scale of any proposed development should be approximately no higher than the trees which surround the site. Finished floor levels, ground levels and cross sections of the proposed development should accompany any planning application. An office element should face onto Doddington Road and the parking area. Consideration will need to be given to the colour of any external walls and roofs ensure that they blend in with the surrounding landscape. Without a detailed scheme it is not possible to provide any further detailed comments.
There is not sufficient information at this stage to confirm whether the proposed design, scale and layout building would satisfactorily comply with policy 8 (d) (i) and (ii) of the JCS.

**Noise**

To ensure quality of life and safer and healthier communities the JCS at policy 8(e) (ii) states that new development should be prevented from contributing to or being adversely affected by unacceptable levels of noise.

The proposed development has the potential to have an effect on neighbouring businesses during the construction phase through dust and noise. The council’s environmental protection officer recommends that a construction environmental management plan would need to accompany any planning application.

**Air Quality**

Consideration should be given to mitigation of any impacts on local air quality. The council’s environmental protection officer recommends that consideration should be given to the provision of electric charging infrastructure, cycle stands, standards of gas fired boilers and consideration of alternative heat/energy sources. An air quality assessment including mitigation scheme should accompany any planning application.

**Effect/Impact on the Living Conditions of the Neighbouring Occupiers and the Future Occupiers of the Development**

The JCS at policy 8(e)(i) details policy relating to the protection of amenity of neighbouring occupiers. Policy E1 of WNP seeks developments to demonstrate that they would not unacceptably impact on local amenity for neighbouring residents and businesses.

New development should not unacceptably impact on the amenity of existing and future occupiers, businesses or residents in terms of noise, vibration, smell, light, loss of light or overlooking. The proposal, and in particular the proposed use of the site would have to be assessed as to its amenity impacts. Without a detailed layout it is difficult to provide any meaningful comments at this stage. Any layout plans should show the application site in its context and accurately plot neighbouring units and boundary treatments.

There is not sufficient information at this stage to confirm whether the effects on neighbouring businesses would satisfactorily comply with policy 8 (e) (i) of the JCS.

**Impact on Highway and Parking**

JCS policy 8 (b) (i) gives a number of requirements that new development should achieve with regards to highway, pedestrian and other sustainable transport matters.

Policy 8 (b) (ii) seeks to ensure that developments have a satisfactory means of access and provision for parking, serving and manoeuvring in accordance with adopted standards.

Policy E1 of WNP seeks developments to provide connectivity improvements between the site and Wollaston by walking and cycling and not have an unacceptable impact on highway infrastructure not have an unacceptable impact on highway infrastructure.

Northamptonshire highways recommend that in view of its size and nature it is appropriate for the proposed development to be subject to a Transport Assessment in accordance with policy DM2 of the Northamptonshire Highway Development Strategy with particular inference upon the following:

a) Assessment and Mitigation of the effects on the highway network of the traffic generated by the development in highway safety and capacity terms.

b) Making best possible use of the existing transport infrastructure.
c) Managing access of the highway network.

d) Demonstrate effective connections to the strategic road network.

e) Not focus on road building or highway capacity enhancement as the sole means of catering for the transport demand generated by the development.

f) On implementing Northamptonshire County Councils’ modal shift targets.

g) Actively address the environmental impact of travel improving sustainable transport choices.

h) Maximise accessibility by walking, cycling and public transport modes.

i) Have proactive and appropriately funded Travel Plans which assist in influencing travel behaviour.

The assessment should include consideration of the impact of the development on the site access junction and the junction between Doddington Road and the A509.

The Wollaston neighbourhood plan draws attention to the lack of footway facilities along Doddington Road between the site and the A509 and the significant barrier that the A509 presents between the site of the development and services located within the village. To improve the sustainability of the development the transport assessment should consider measures to enhance connectivity for pedestrians and cyclists. Should it prove necessary to widen the bridge over the Wollaston Brook a financial contribution from the developer will be required.

Doddington Road, west of its junction with Grendon Road, is subject to a 7.5 tonnes weight restriction order.

Parking accommodation should be provided in accordance with the Northamptonshire parking standards and satisfy policy 8 (b) (ii) of the JCS. Please note a B8 (storage and distribution) use would be required to provide 1 parking space per 120 square metres. A B2 (general industrial) use would be required to provide 1 parking space per 50 square metres and a B1 (office) use would be required to provide 1 parking space per 30 square metres. 10% of the total car parking spaces should be for the disabled. Cycle and motorcycle parking should be provided within the site. A proposed parking plan should accompany any application and provide a breakdown of the number of spaces being provided in relation to the uses which are taking place within the site.

A detailed site layout plan showing all new development, means of access and off-street parking/turning arrangements for cars and HGV’s should accompany any outline or detailed planning application.

There is not sufficient information at this stage to confirm whether the proposed parking and servicing areas would satisfactorily comply with policy 8 (b) (i) & (ii) of the JCS and policy E1 of the WNP.

Public Footpath
Public footpath TV2 is affected by the proposal. With respect to construction works to be carried out in close proximity to and using Public Rights of Way as access, please note the following standard requirements:-

- the routes must be kept clear, unobstructed, safe for users, and no structures or material placed on the right of way at all times, it is an offence to obstruct the highway under s137 HA 1980;
- there must be no interference or damage to the surface of the right of way as a result of construction. Any damage to the surface of the path must be made good by the applicant to the specification of the Local Highway Authority;
- if as a result of the development the Right of Way needs to be closed application must be made for a Temporary Traffic Regulation Order. An Application form for such an order is available
from Northamptonshire County Council website, a fee is payable for this service and a period of six weeks’ notice is required. Please follow the link below and contact the highway authority at: defmap@kierwsp.co.uk.


-any new path furniture (e.g. gates preferred over stile) needs to be approved in advance with the Access Development Officer, standard examples can be provided.

Contamination

The JCS at policy 6 says that local planning authorities will seek to maximise the delivery of development through the re-use of suitable previously developed land within the urban areas. Where development is intended on a site known or suspected of being contaminated a remediation strategy will be required to manage the contamination. The policy goes on to inform that planning permission will be granted where it can be established that the site can safely and viably be developed with no significant impact on either future users of the development or on ground surface and waters. Policy E1 of WNP proposals for the must have remediate land contamination.

The NPPF at chapter 15 sets out policies on development involving contaminated land. The planning practice guidance also offers detailed government advice on this topic.

The council’s environmental protection officer considers that as this site was used for agricultural purposes and the stabling of horses there is potential for contamination issues. A preliminary risk assessment should accompany any outline or detailed planning application which identifies whether there would be a need for further investigation. The site investigation scheme should provide a detailed assessment of the risk to all receptors, including off site receptors. Any remediation scheme should be based on the results of the site investigation and risk assessment and provide full details of remediation required. The content of the preliminary risk assessment, site investigation and remediation proposals shall be agreed with the local planning authority in consultation with the council’s environmental protection officer (contamination).

Crime Prevention

The JCS at policy 8 (e)(iv) sets out the policy requirement for new development to seek to design out crime and disorder and reduce the fear of crime. The adopted designing out crime supplementary planning guidance gives detailed advice this issue.

Northamptonshire police have the following comments, which if implemented will reduce the likelihood of crime, disorder and anti-social behaviour occurring. This is in the interest of the security and quality life of future occupants of the development in accordance with policy 8 (e) (iv) of the JCS. 

External doors should comply with the loss prevention certification board (LPCB) security standard LPS1175 SR 2 or 3 and doors manufactured in accordance with the standard must be installed. All Glazing should be provided with security grade glazing of P2A standard as minimum requirement.

All the buildings must have an intruder alarm system installed in compliance with Association of Chief Police Officers (ACPO) security alarm policy. This ensures that the technical aspects of the alarm specification will result in a police response to a confirmed activation on site. An internal alarm that can be zoned is also suggested. This will allow areas that are not being used to be shut down and protected, while allowing other areas to be used.
Any roller shutters should be certificated to LPS1175 SR 2 or 3 and have contacts fitted linking them to the burglar alarm system.

The rear and sides of building should be made secure where only authorised personnel have access.

A statement of crime prevention measures to be integrated into the design of the building should be included within any design and access statement.

There is not sufficient information at this stage to confirm whether the proposed crime prevention measures would satisfactorily comply with policy 8 (e) (iv) of the JCS.

**Broadband**

Policy T4 of the WNP requires all new development to have a condition attached requiring the provision of fibre optic cable into each premises to enable the delivery of superfast broadband.

The Northamptonshire vision is for the county to be at the leading edge of the global digital economy. This requires new developments (both housing and commercial) to be directly served by high quality fibre networks. Access to a next generation network (speeds of >30mbs) will bring a multitude of opportunities, savings and benefits to the county. It also adds value to the development and attracts occupiers. The County Council encourages early registration of development sites, which is key to making sure the people moving into your developments get a fibre based broadband service when they move in. For further information on the Superfast Northamptonshire project please visit [www.supercarsnorthamptonshire.net](http://www.supercarsnorthamptonshire.net).

**Public Consultation**

An afternoon/evening public consultation event could be held in the nearby Wollaston village hall, inviting the occupiers/owners of properties including businesses which abut the site to view and comment on the plans. These comments could then form a part of your statement of community involvement and you could address whether any further changes have been made to the plans as a result of community involvement. You should also carry out consultation's prior to the submission of any planning application with Wollaston parish council.

**Conclusion**

The proposed development seeks to develop a site that is designated as an allocation for B1, B2 and B8 uses in the WNP. The principle of development in this location would be acceptable. Any full application should be assessed against the criteria in Policy E1 of the WNP to ensure compliance with the objectives of the site allocation. Any full application would also have to be assessed against the criteria in policies 3 and 4 of the JCS in terms of conserving and enhancing the areas landscape character and biodiversity.

The detailed design, layout, parking and access of any final scheme would need to be assessed against the criteria in policy 8 of the JCS. A transport assessment is required to assess the effect of the traffic generated by the proposed development on the surrounding highway network to establish what improvements could be made to connect the site to Wollaston village.

There is not adequate information to confirm whether or not officers are able to support the proposed development.

The following documents should accompany any planning application:

A Planning Statement;

An assessment of the condition of the ridge and furrow and an archaeological field evaluation comprising geophysical survey and trial trenching;
A Design and Access Statement including crime prevention measures;
Landscape and visual impact assessment;
A Tree Survey including root protection measures;
A Landscape Principles Plan;
A construction environmental and traffic management plan;
An Environmental Risk Assessment in relation to former agricultural uses;
A phase 1 ecology survey including any relevant mitigation surveys;
A Biodiversity enhancement plan;
A transport assessment;
A Flood Risk Assessment and surface water drainage plan;
Air quality assessment including mitigation measures;
Parking plan;
Tracking plans of HGV’S using the service yards;
Site layout plan showing siting of building, access, parking and any sustainable urban drainage;
Ground and first floor plan and elevations;
Site location plan;

The advice given above is the informal opinion of an officer only and it will not fetter or bind other officers or councillors if they are called upon to make a recommendation or take a decision on any formal planning application.

In addition, the council cannot accept responsibility for any action you or your client may take as a result of receiving this advice. Furthermore, this advice has been formulated without the benefit of receiving comment from other statutory and non-statutory consultees or responses from members of the public which could result in a different recommendation to the advice given.

I hope the above advice is of assistance. I can be contacted on the above number if you require further clarification in this matter

Yours faithfully,

Debbie Kirk
Senior Development Management Officer