

Hybrid planning application S/2020/1644/EIA at site AL3 Tiffield Lane

In response to the decision on 27th January 2022 by West Northamptonshire Council to grant outline planning permission at Tiffield Lane, Towcester, CPRE Northamptonshire wishes to bring to light a number of significant errors and omissions in the information presented to the meeting that denied Planning Committee and councillors the opportunity to make an appropriate and informed decision regarding the development. CPRE Northamptonshire is therefore of the opinion that the decision made was invalid, unless certain supplementary conditions are applied to the application.

The following is a summary of points made in the CPRE response to the application on 5th November 2020 by CPRE Hon. Technical Secretary, Alan Mayes:

1) CPRE questioned the positioning of the development at the gateway to the historic market town of Towcester and the close proximity to a grade II registered park and grade I historic building. CPRE also questions the methodology behind the selection of this site for B8 warehouse development, as well as another adjacent hybrid application AL1 in the recently adopted Local Plan.

2) The policy AL3 at point 2 requires a master plan to be prepared in conjunction with the LPA prior to the submission of a planning application. The approach taken in the Design and Access Statement is to submit alternative approaches for the master plan. It is not made clear how this approach accords with the requirement of the AL3 given that outline approval is being sought - which could at the submission of reserved matters lead to alternative layouts and uses being deemed acceptable because the whole matter has been dealt with in outline. A more robust master plan application must be sought and should have been prepared at the outset.

3) As requested in AL3 point 3, the proportion of uses within the employment category should be independently assessed and market evidenced. There is no evidence that this has been effectively carried out by independent assessors.

4) Point 5 of AL3 requires a heritage impact assessment of the proposals on the important heritage assets located around the site and states that this will explicitly include an assessment of any new buildings and their impact on the grade II* registered park at Easton Neston. Although an assessment has been carried out it is based on a very theoretical arrangement of land uses which currently make up this hybrid application. This approach has not been made in accordance with the guidelines of the original policy AL3, and as a consequence the heritage statement concludes that "less than substantial harm will occur", when in fact, substantial potential harm could occur to the setting of the park and house due to the size and especially the height of the warehouse buildings planned for the site. Had an approach which tried to mitigate this harm by designing for smaller units within a parkland setting been adopted a more sympathetic outcome might have been achieved both in terms of the relationship to Easton Neston and as a gateway site into Towcester, and the environmental impact on the adjacent

village of Tiffield. As such, the potential damage to the village of Tiffield has been overlooked by planners and consequently the planning committee. The environmental impact on the village must to be more accurately assessed.

5) Section 190 of the NPPF also states that in assessing the impact on a heritage asset this should include development affecting the setting of the heritage asset. We would contend that in this context the proposals to include a petrol filling station and the largest buildings within the proposal at the eastern end of the A43 their impact on the setting of the heritage assets, in particular the registered park and garden at Easton Neston, will be significant and could be classified as substantial harm to the significance by the nature of the impact on the setting. As such any planning application which has a substantial impact on the significance of a heritage asset should be refused.

6) CPRE is also of the opinion that the provision of B8 development (See note 1) for this area is inappropriate as it does not meet the need for employment uses in the area. Statistics collated by West Northamptonshire Council's own Economy, Culture and Tourism, Place and Growth Directorate and the 2008 NOMIS Census survey state that only 4 percent of the population of South Northamptonshire area actually works in the logistics industry. Currently, only about 160 local people are listed as claiming Job Seekers Allowance.

7) An appropriate decision regarding this application can only be made with the adjacent AL1 and AL2 application and for all three sites to be considered in a master plan, as one.

In conclusion, CPRE is of the opinion that proper scrutiny must be given to the serious potential damaging impact that a development such as this would place on the long-term sustainability of Towcester as a historic market town.

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