



The countryside charity
Northamptonshire

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Application No. NK/2024/0717 - Planning Application Harworth Estates Investments Ltd Nunnery Farm, Harrington Road, Rothwell, NN14 6AW

Construction of up to 170,184 m2 of class B8, B2 and E(g)(iii) units, including site access and infrastructure. All matters reserved except details of vehicular access from Harrington Road, and for the enabling earthworks, including bunds and associated landscaping. Outline Application with EIA.

Summary of CPRE's objection

CPRE Northamptonshire (CPRE) stands in support of the Rothwell Against Warehousing Group (RAW) in their objection to **NK/2024/0717** as outlined above. This application is being presented by Harworth





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Estates Investments Limited (the applicant). The core of CPRE's objection is the permanent destruction of open countryside. The site of 82 acres (33 Hectares) is in a particularly dominant position on the western edge of the historic market town of Rothwell in Northamptonshire. It is clearly seen from this photograph, taken looking west from a position over Rothwell, that traditional unspoilt countryside stretches a meaningful distance from Rothwell. The proposed development will completely change the character of the area of this very sensitive landscape. CPRE, as is well known, opposes such permanent destruction of greenfield countryside. The warehouses, if built, will last 20 to 40 years. The loss of the countryside is permanent.

But that is not all. The application rides roughshod over a number of core policies of North Northamptonshire Council (NNC). We will present below how the applicant has misrepresented issues relating to employment (and hence GDP growth), highways and access, and flooding. All these points are explored using local experts with real life experience and are covered in great detail in a number of well researched objections which have been lodged with NNC on their planning portal. In this paper, CPRE will not repeat the work rightly attributed to these local experts but will summarise to support our own objection.

To put this in a nutshell: **This application is too big and in the wrong place.**

Action required by CPRE

CPRE Northamptonshire recommends that NNC planning officers and members reject the application **NK/2024/0717** on the grounds that the land at Nunnery Farm is classed as open countryside by the **NNC Joint Core Strategy (2011-2031) and Kettering Site specific Part 2 Local Plan**, and that there are no material considerations that would override that status. CPRE also recommends that in the developing Local Plan the area to the west of Rothwell, but within the boundaries of NNC, continues to be designated as open countryside and every encouragement is given to promote the land use framework for the area, as farmland.

Detailed discussion

Landscape and Visual Impact

This is unequivocally confirmed in the **NNC Joint Core Strategy (2011 – 2031) and Kettering Site specific Part 2 Local Plan**. This could only be overturned if material considerations were taken on balance to outweigh the harm done by the permanent destruction of open countryside constituting grade 1 and grade 2 agricultural land. Within the NNC JCS, **Policy 38** shows that land to the west of the A6 Rothwell/Desborough bypass is designated Green Infrastructure. **Policy 25** (Rural Economic Development and Diversification) and **Policy 26** (Renewable and Low Carbon Energy) also apply. NNC are developing a new Local Plan and have already issued a call for sites. The Pegasus Group who are acting as the applicant's agents have submitted an offer of Nunnery Farm (**ref 095**) as B2 / B8 use class on 43.36 Hectares. CPRE will oppose this submission at the appropriate time on the grounds that it is inappropriate development on an historic greenfield site.



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A Landscape and Visual Impact Assessment (LVIA) is required and it is imperative that this is carried out by an independent review based upon a large number of viewpoints at a 7.5km radius of the site and to embrace a variety of different sensors. This assessment should be presented as at the date of presentation and also at 15 years in the future to show the effect of tree planting used as screening. Before submission to Committee for decision it is also suggested that a three-dimensional computer-generated interactive model is submitted as part of this application to fully inform planners, members and the public of the visual impacts.

Employment

Harworth originated as the property arm of UK Coal. They have done commendable work in developing deprived communities in the coal mining areas (mainly Yorkshire) where the demise of coal mining created localised deprivation and especially unemployment. This strategy, however, does not relocate into North Northamptonshire.

As a county we are focussed on achieving growth in GDP. Progress has not been consistent or healthy and we continue to look for ways forward. However, in an area like Rothwell, the building of a warehouse complex is unlikely to achieve growth at either Unitary Council level or even at National level.

There are a number of reasons for this as follows:

1. Rothwell has low unemployment. In fact, the whole of North Northamptonshire is now in the same position. It wasn't always like this but efforts to improve working opportunities in Corby have shifted the balance.
2. Most jobs in warehouses (especially B8 use, which is the mainstay of this application) are low paid.
3. If the warehouses are built, workers will have to travel from outside the immediate area. This means that potential businesses will have to compete with other warehouse clusters like DIRFT and Northampton Gateway.
4. Workers on low wages cannot afford to live locally – the rents are too high.
5. B8 Warehousing is rapidly moving towards automation (Amazon is already leading the way).
6. We already have excess pipeline supply of warehouses over projected demand (**WNC HENA June 2024**)

The warehouses proposed at Rothwell will not stimulate economic growth. In practice warehouses like this are economically sterile when situated in low unemployment areas and most likely are economically regressive.



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Highways and Traffic

This photograph was taken from above Nunnery Farm on a typical weekday morning.



It shows the A14 at a standstill in both directions and how the A14 is already at or above maximum capacity. Distribution warehouses by definition create additional traffic movements by virtue of their function but also because employees will not be able to live locally and will travel to work. The only way strategic distribution makes sense in the poor infrastructure of Northamptonshire is to be located at a Rail Freight Interchange like DIRFT or Northampton Gateway.

Traffic surveys and modelling will be presented for consideration with this application but their predictions must be very vigorously analysed to show how already over full road networks can absorb more vehicles. The evident truth is that it can't, and the traffic prediction experts, in reality, do not fully understand the algorithms that make up the evidence presented.

Public Rights of Way

The applicant has stated that the two Public Rights of Way that criss-cross Nunnery Farm need to be relocated and yet the development masterplan does not show the proposed diverted routes. CPRE must emphasise that it supports the existence of Public Rights of Way as hard-earned rights of access to the countryside. The formal process of relocating them is complex and expensive. When faced with local opposition this process is especially time-consuming. The application dismisses this complexity but for this site it will be a major issue. In itself, the relocation of such public rights of way does not constitute a 'planning' reason to reject the application but in the consideration of the sites appropriateness it is an issue of major public concern.



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Environmental Impact

Nunnery Farm lies in an area of flood risk and surface water run-off. The creation of large expanses of impermeable warehouse structures will exacerbate the problem by speeding up the natural surface water drainage and disposal into Slade Brook and across the Harrington Road. Climate change has had significant effects across Northamptonshire where incidence of flooding has increased over time. This potential development will increase the risk and consequence of flooding across the neighbouring highways and local homes. Very limited mitigation is included in the application. The site discharge rate given for phase 1 is unjustified in any way and for the larger phase 2, no run off mitigation is provided. Rothwell Town Council has acknowledged its responsibility to the people of the area through policy **ENV10 of its Neighbourhood plan (draft)**.

Summary

CPRE Northamptonshire recommends that NNC planning officers and members reject the application **NK/2024/0717** on the grounds that the land at Nunnery Farm is classed as open countryside by the **NNC Joint Core Strategy (2011-2031) and Kettering Site specific Part2 Local Plan**, and that there are no material considerations that would override that status. CPRE also recommends that in the developing Local Plan the area to the west of Rothwell, but within the boundaries of NNC, continues to be designated as open countryside and every encouragement is given to promote the land use framework for the area, as farmland.

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