



The countryside charity
Northamptonshire

The Wheatsheaf
Spring Hill Farm
Harborough Road
Pitsford
Northampton NN6 9AA

01604 780000
admin@cprenorthants.org.uk
www.cprenorthants.org.uk

Ms Rebecca Grant
Planning Officer
West Northamptonshire Council
Planning Department
The Guildhall
St Giles Square
Northampton
NN1 1DE

April 2025

by email to rebecca.grant@westnorthants.gov.uk

Dear Ms Grant

2025/0690/MAF: Land to west of Round Spinney, Thorpeville, Moulton: Proposed erection of a crematorium, wake facility, access and car parking area with associated landscape and biodiversity enhancements

1. A great deal of work has gone into this application after narrowing down possible sites for this seemingly much-needed extra facility, from 11 sites to four, then three, with accompanying specialist reports. The architects are experienced in this kind of building type. However, there is no hard data/evidential base to justify the need for this facility especially given the changing demographics of the ending of the 'baby boom' generation and a general lowering of the birth rate. This may give a lifetime maximum use of 10-15 years which could then decline. The site itself was outlined for neighbourhood development only (See Figures 4 & 5 policies map West Northants Core Strategy document), with commercial/other development limited to the existing Moulton Park Industrial area para 5.6, **Policy S8 (e)**. There are other anomalies with respect to the Strategic Plan, noted below.
2. Questions remain to determine the full impact without a detailed land survey and relationship to the village of Moulton. This CPRE document will be restricted to commenting on aspects regarding siting, possible pollution and land use. The overall emphasis of the application submission has been on consultation locally and with funeral directors with many specialist consultants reports rather than statutory compliance.

Letters and numbers in bold refer to West Northamptonshire Joint Core Strategy Local Plan adopted Part 1 2014.

Traffic congestion and noise

3. The objections with regard to proximity to the school and to the traffic and car parking problems have already been submitted by concerned residents who regularly experience gridlock like many other small villages in Northamptonshire.

4. Although the proposed site entrance has been moved in response - this may not be enough for people who will travel from North of the site and for the congestion arising from drop off and pick up at school peak times.
5. **Policy 5.15** (p.56) on development in rural areas on new development: 'protecting the overall rural character including the tranquillity of areas which have remained relatively undisturbed by noise...)

Pollution and mitigation

6. UK Building standards - Process Guidance note 5/2 (12) is the statutory guidance for crematoria identifying possible pollutants and whether these are from unabated cremation including Hydrogen Chloride, Nitrogen Oxides, Carbon Monoxide, Mercury and Volatile Organic compounds. Although the technology for dealing with these is improving all the time and most pollutants can be 'scrubbed' the monitoring regimes are not clearly stated apart from the statutory 3 -month inspection by the EA. There may not be control over Nitrogen Oxides.

(Section 4.6 sets out the instrumentation needed). If this makes the operation uneconomic, costs may fall on West Northants for monitoring and control.

7. The reason for concern and monitoring is not only the proximity to the school, which although shown outside the 200-yard exclusion zone, has effect on the playing fields clearly inside the restricted zone and obviously used by pupils. In addition, there seems to be no detailed level survey but the village of Moulton to the East shows a spot height of 109 metres. This appears to be approximately four metres higher than the located chimney. (Note no heights are shown on the proposed levels but interpolation from the architect's sections sites the chimney at 105.) The chimney height of 8M stated on p.41 of their design report would be inadequate. This proposed dimension by the architects is not used in the Air Quality report which uses a 9.45M release height- so out by 1.45M - and which does not state any assumed contour level. Given the prevailing winds from a South Westerly direction (Diagram 4.4 in the Air quality Assessment) this means the East side of Moulton will be at risk. Downwash or downward deflection of airstreams is mentioned but not considered an issue. With the lower siting of the chimney by possibly 4M, this is a real concern for residential buildings on the East which will be directly in the path of fumes not reaching lamellar air flow. Recent weather events have shown backdraft in chimneys locally and so inversion layers with a pooling of still air at lower levels are possible.
8. Greenhouse gas emissions may well be at odds with West Northants policies on future policies together with ambitions for net zero emission targets and air quality generally.
9. The Air quality prediction in the consultant's report of 19.0 µg m⁻³ is almost half the air quality target of 40 µg m⁻³ but this is still a prediction that will need monitoring. Likely changes in air quality are shown to be substantial graphically in the consultant's report as against existing data. There is also an assumption that all VOCs and TOCs are benzene. However, the toxicity of emissions is also dependent on the materials used in caskets and is not always known in advance.
10. The development contradicts ambitions in **Section 5.106** which seeks to '...minimise impacts on the amenity of the area, in respect of visual intrusion, noise, dust and odour and traffic generation'. (p.57).



The monitoring regimes should be made a condition of planning approval and in this instance be for continuous monitoring for a period to be determined.

Heritage Impact

11. This report states in 2.1: 'There is a strong presumption against the grant of permission for development that would have on the special interest of the conservation area, though this may be capable of being mitigated and outweighed by public benefit'.
12. The report states 'that the crematorium proposals would not have any harmful impacts....' P.23 6.4. but this excludes buried archaeological assets.

Archaeological considerations

13. The report shows that fieldwork detected features of possible iron age/roman origins with boundary ditches but with no recommendations for future investigations. Ironically archaeological investigations under the school's site prior to building, showed remains of 'a small bronze age cemetery' which shows the land to the West could be worth more detailed examination and trenchwork prior to building. The architect's design statement 'there are no archaeological features of significant interest present on site' is at odds with the MOLA report stating 'The survey has successfully detected a few features of archaeological interest, likely to be of Roman or Saxon origin.
14. Historic England have early photographic surveys showing features defined by crop marks.

*Consequently **section 12.25** is relevant to require a full archaeological assessment with fieldwork.*

Biodiversity

15. This report is mainly a desk top study and draws very few conclusions of likely wildlife at risk, just identifying possible habitats. However, the survey was undertaken in January 2025 when frost was clearly on the ground in the pictures and there would be very little evidence from dormant wildlife and difficult to identify any species of flora/plant species.

Site visits and subsequent reports should be undertaken from late spring to early autumn.

Agricultural farmland

16. The classification under the broad classification of Wick 1 soil association 'This is good farmland...' p.9 para 3 was downgraded in this report to Grade 3a because of the wet soil, i.e., its inability to drain falling from West to East 115-107M above sea level approximately. Farmland is a diminishing and irreplaceable resource.
17. **Policy R2** seeks to protect existing productive farmland. This has become more critical with regard to food security issues and the tendency to lose farmland to solar installations in the county. CPRE has lobbied for the retention of existing farmland. and this land is still considered BMV - 'best and most versatile'.



Drainage and Flooding and technical impediments

18. Although the site is technically at low risk from flooding, the subsoil conditions do not allow for natural drainage or future soakaways. The site inspection is dated in July, when there is less flooding and waterlogged fields aren't visible, chiefly to the East of the site. Groundsure show clearly the historical build-up of housing locally that has increased surface water run-off and now reduce the ability of fields to drain naturally. Anglian Water acknowledges that soakaways are not viable here and state there is no public surface water service locally, and that discharge has to be to the South of the site. Even though Anglian Water state cover and invert levels are unavailable, a whole drainage system has been mapped and proposed but this must be with the need to construct a new public sewer causing significant disruption in the area. The drainage system shows 52 manholes up to between 4-5M deep. If this drainage system has to be so extensive because of the soil impermeability, how does this marry with the extensive landscaping proposals which will need a degree of water retention?
19. **Policy BN7A** is relevant here particularly: *development proposals will ensure that adequate wastewater treatment capacity is available to address capacity and environmental constraints.*
20. In **4.44** 'All development proposals will need to fully consider climate change adaption to meet the vision of sustainable development.

This is a missed opportunity to conserve water and instead overloads existing infrastructure.

Conclusion

21. The possibilities of pollution and need for careful monitoring are paramount. The loss of agricultural land with the accompanying extensive drainage system means this land will be lost permanently for agricultural use. There is a demographic 'bulge' that makes this crematorium currently viable but future demographics and lowering birth rates may not need such a large facility.

Summary of recommendations by CPRE

- Requirement for continual monitoring of air quality as a pre-condition for any approval;
- Full field archaeological investigations prior to site work;
- A Traffic management scheme showing new access/link to A43 for prior approval by Highways with full approval by Moulton Parish Council, and producing the full traffic flow not only in operation but during construction including the satisfactory movement of materials and disposal of waste;
- A further biodiversity report taking into account and fully identifying the seasonal surge of wildlife and flora from Spring to Autumn including a bat survey by a registered specialist;
- A water management scheme that emphasises storage and retention of water to obviate the need and local disruption of building a new public sewer.

CPRE Northamptonshire



The countryside charity
Northamptonshire