

Ms C Tait
East Northamptonshire Council
Planning Services
Cedar Drive
Thrapston
Northamptonshire
NN14 4LZ

Dear Ms Tait,

**Proposed Distribution Centre (B8 Use Class) together with ancillary offices, parking, servicing and site landscaping
West End Land North of Brick Kiln Road Raunds
Planning Application Ref. 17/00266/FUL**

We have been instructed by Raunds Town Council to prepare comments in relation to the proposed distribution centre on land off Brick Kiln Road, Raunds. Having fully considered the submitted material, the Town Council have voted to object to this application.

The Councillors are concerned that this application will have a significant and detrimental impact on the adjoining residents, represents another visually dominant warehouse building on the edge of the town and will create unacceptable levels of 24-hour HGV traffic.

The planning application draws heavily on the previous, outline approval on the site, which was granted permission in 2012, ref. 11/01747/OUT. That application allowed for the following form of development:

“Outline: proposed sustainable urban gateway to Raunds comprising employment (Use Classes B1, B2 and B8); residential (Use Class C3); new vehicular and pedestrian access and associated road infrastructure, public open space and landscaping, including flood alleviation measures. (All matters reserved except for access).”

It is evident that permission was granted for a ‘sustainable urban gateway’, which included residential development and a mixture of employment uses. The indicative site layout plan submitted with that application suggests a collection of employment buildings, and this approach was confirmed by the Officer’s report supporting the application which stated:

“The employment part of the site shows five buildings laid out in two rows and separated by an access road and parking / loading area. The idea is that the units would be flexible, but on the indicative layout the buildings are shown as being split into smaller units, giving a total of 15 small-medium units. The smaller units would range from 232sq.m - 1394sq.m, with the larger units at the northern edge of the site ranging from 2300sq.m - 7000sq.m. The maximum height of the commercial buildings would be 12 metres.”

Clearly, there was an expectation that the development would deliver a range of employment opportunities, including office spaces and smaller industrial units that would provide opportunities for smaller businesses to bring jobs to Raunds.

The officers report continued to say:

“Working within the scale parameters indicated in the design and access statement (a maximum height of 12 metres for the proposed commercial buildings, which is not significantly higher than a typical 10m high three storey dwelling) the visual impact in the wider landscape would be minimal.”

Again, this is evidence that the scale, height and impact of the buildings had been carefully considered, particularly in the context of the neighbouring residential development permitted as part of the 2011 application.

“Given that this is an outline application with only access up for full consideration, your officers' view is that the above issues could easily be incorporated into a reserved matters scheme. The overall principles that have been established within the indicative layout and design and access statement are robust. A condition is recommended that requires the submission and approval of a Design Code, which could ensure that the strong principles of the submission could be combined with other suggestions made above, and that this would have to be adhered to when drawing up the detailed design of any reserved matters application (condition 7). The character and design of the individual dwellings and streets can also be subjected to further scrutiny at the reserved matters stage.”

The conclusion can be drawn from this, that the Officer's support was given to the scheme based on restrictions being placed upon the detailed design of the development through a design code. Whilst a detailed design code was submitted for the residential element of the scheme, alongside information to discharge the planning conditions relating to that element of the scheme, no design code was submitted for the mixed commercial uses.

This latest planning application seeks permission for a substantial expansion of the B8 floorspace on the site, increasing from 11,613 m² to 21,135 m², an addition of almost 10,000 m². It has been claimed by the applicants that the increase is less significant, as there was no restriction on the B1 and B2 space being converted to B8 use, although we would argue that the Officers report signalled the intention to control the form, scale and mix of development on the site to reflect that promoted by the 2011 application.

The Town Council are concerned that this intensification of B8 use on the site does not reflect the original planning application and would have adverse traffic and amenity impacts for the adjoining neighbours.

In that regard, the layout of the site has been changed so that the HGV traffic not only passes by the residential development, but then runs along the boundary of the site in front of the proposed warehouse building. The 2011 scheme had the buildings arranged around the outside of the site, with the traffic and activity contained within the central area, shielded by the buildings themselves. This would contain the traffic noise to a far greater extent within the site. In consolidating and expanding the B8 floorspace, the developer has taken the opposite approach and forced the traffic and activity to the perimeter of the site where the effects of traffic movements will be most heard and disturbance increased.

The development would also move to 24-hour operation, rather than standard business hours typically seen in B1 and B2 uses. We note that the EHO has expressed concerns that the proposed development would harm the amenity of the neighbouring residents, generating noise levels that cannot be mitigated with screening. Part of this concern relates to the layout of the development, but there is also concerns expressed about HGV's travelling along the access road to enter and exit the development. The Town Council share these concerns and believe that 24-hour operation of this site cannot be acceptable in any circumstances. The access is too close to existing residents for this to be allowed.

Paragraphs 120 and 123 of the NPPF seeks to protect health and quality of life from the impacts of development. The feedback from the local community is clear, that they are very concerned that this development will significantly impact upon the quality of life of those in the surrounding area.

The transport assessment considers the number of HGV movements, and assumes that all the permitted floorspace would be in B8 distribution use. In doing so, this artificially increases the number of HGV movements for the permitted scheme, not reflecting the comments made by the planning officer regarding the need to secure a range unit sizes and mix of employment activity.

Accordingly, the figure being put forward for the approved development of 220 HGV movements in a 24-hour period is not correct. A pro-rata figure based upon the suggest B8 floorspace of 11,613 m² gives a figure of 137 HGV movements. Whilst it is recognised that the B1 and B2 elements of the permitted scheme may generate some HGV movements, it is valid to point out that the application overstates the number of HGV movements in the approved application by a substantial margin, attempting to minimise the This suggests that the submitted application would lead to a far greater increase in HGV movements compared to the approved development.

Finally, the Town Council are concerned that the provision of a further large warehouse on the edge of Raunds will contribute to further erosion of the character and appearance of the area. Raising the height of the building by 33% compared to the approved scheme will not respect the height of the neighbouring residential development.

Paragraph 64 of the NPPF requires development that does not improve the character or quality of an area and the way it functions should be refused. Paragraph 66 stipulates that applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. We are of the view that this proposal does not meet these basic requirements.

Summary

For these reasons the Town Council strongly opposes this development. The creation of new employment opportunities within the Borough are welcomed, and have been established on this site by the 2011 planning application. It was clear that when recommending that scheme for approval, there was a clear intent to agree a design code for the development that reflected the parameters suggested by the outline application.

This scheme seeks to intensify the distribution use of the site; increase the amount of developed floorspace; increase the height of the buildings; increase the number of HGV movements; allow HGV traffic closer to residential properties neighbouring the site; and allow 24-hour operation. The Town Council do not support this overdevelopment of the site, which will lead to unacceptable living conditions for the neighbouring residents.

We respectfully request that these comments are taken account when determining this application.

Yours sincerely



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cc Kate Houlihan
Town Clerk
Raunds Town Council