

10 December 2018

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

As you may recall, we wrote to you in May 2017 to raise objections to this planning application on the behalf of Raunds Town Council. Now that the planning application is due to be considered at Planning Management Committee on the 12th December, we have been asked to reiterate the Town Council's objections based upon the revised scheme.

It is acknowledged that the revised access into the site from the A45 has addressed the Town Council's concern regarding the access running through the new housing estate via Brick Kiln Road and Holdenby Drive. However, several issues remain that are fundamental concerns to the Town Council and the residents that will be affected by this development.

It is evident that the size and scale of the building is very different to that envisaged by the outline planning permission, which secured consent for a 'sustainable urban gateway to Raunds', as the application was described under permission reference 11/01747/OUT. That application was supported by an indicative site plan showing a smaller collection of employment buildings offering a range of different uses, more appropriate to the scale of the residential development adjacent to it.

Having established that employment use, the site was included within the Raunds Neighbourhood Plan as an employment allocation. The principle of employment use here is not in question, however, the Town Council are particularly concerned about the amalgamation of floorspace into one very large building, much higher than that suggested by the outline permission. This is an intensification of use in terms of both the physical scale of the proposal and also the level of operational activity. The adverse impacts on residents would also be intensified compared to a development more in keeping with the outline permission.

As highlighted by our May 2017 letter, the officer's report supporting the outline planning permission described the employment development as follows:

"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."

The report also stated that:

"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."

The proposal subject to this planning application is for a building that is 50% taller and over 200 metres long. The perception from the residential properties overlooking the building will be a single mass, dominating the skyline without gaps or interruption. The visual impact of this scheme will be significant on the nearby residents, the character of the Nene Valley and the setting of Raunds. These impacts will be much greater than the outline permission intended and should not be accepted as incremental change.

The photomontages produced and included in the landscape and visual assessment show the building largely screened by a mass of trees. The Town Council wish to highlight that these images are shown at year 15 and in summer when the trees are mature and fully in leaf. Whilst this may follow the guidelines for assessing visual impact, the reality is that the views of this building will be largely uninterrupted, particularly in the winter months. The visual impact of this warehouse will be significant for many, many years to come.

The proposed layout of the site includes a lengthy access road running from the A45 roundabout. There are potential for conflicts on the access road, which is widely used for vehicle parking at present, an issue that has been recognised in the officer's report but has not been adequately addressed or resolved.

Within the development, the access road runs along the southern edge of the site, with a very narrow boundary in places to the edge of the development. This forces all of the 24/7 HGV traffic along the closest boundary to the residential properties and leaves little space to provide mitigation of the visual and noise impacts for a significant length of the building.

Whilst there is some bunding proposed, the height of this has not been agreed. Without a continuous bund in place, it will be ineffectual at mitigating noise. Furthermore, the building itself has the potential to reflect noise back towards the residential properties, which at 18 metres high would be a reflective surface far taller than the suggested acoustic fencing.

Condition 12 requires the location, specification and construction of the acoustic barriers and bunds to be submitted prior to the first use of the site. The condition does not require these noise mitigation measures to be installed prior to the site becoming operational. In addition, Condition 10 specifies that noise should not exceed +5dB at the nearest noise sensitive receptor but does not express a baseline level. This condition is unclear and imprecise. Condition 11 is also a concern, as it allows for 15 occasions for noise and disturbance to occur unhindered and the timeframe set in the condition (over the lifespan of the development, so potentially 30 to 40 years or more) would be difficult if not impossible to monitor and enforce.

The Town Council believe that this development will generate noise impacts particularly during night time operation, that will have an adverse impact on residents. Given the sensitivity of noise issues, the lack of proper opportunities for mitigation and the vagueness of some of the conditions to control the operation, there is little confidence that the scheme will not harm residential amenity and that the Council will have the proper controls it needs to control noise levels in the future.

The Town Council have supported the provision of employment development on this site through the adopted Neighbourhood Plan. However, that was on the basis of the legacy established by the outline planning permission and the proviso written into Neighbourhood Plan Policy R13 that: *"the proposed use would not have a detrimental impact on adjacent uses and occupiers."* The Town Council are not satisfied that this scheme fulfils the Neighbourhood Plan policy and believe that there will be a detrimental impact on the adjacent uses and occupiers.

The Town Council do not support this scheme and believe that the noise and visual impacts will be unacceptable to the neighbouring occupiers. Employment use was envisaged at this site, that

is agreed, but it was a very different type of employment that offered a range of opportunities for a greater number of smaller, local companies. This monolithic development will not enable local companies to grow and expand and will despoil the market town character of Raunds. When viewed from the A45, Raunds will be dominated by large warehouses, this and the expended Warth Park development and will be in the same situation as other towns along major arterial roads across the midlands. We must carefully protect our market towns and recognise that these tall warehouses dominate the skyline in a way that used to be the domain of Church spires.

Notwithstanding the Town Council's objections to the scheme, should members be minded to support the proposal, we would request that the following matters are fully considered and the application deferred to allow revisions to be made:

- 1. The layout should be adjusted to move the southern access road away from the southern boundary, accessing the site from western side close to the A45.**
- 2. Full details of the mitigation measures along the southern boundary shall be submitted and approved prior to the commencement of the scheme. These should include a full-length bund and acoustic fencing, supplemented by a consistent, wide belt of landscaping.**
- 3. The conditions regarding noise from the development should be revised to provide effective control and potential for enforcement over a measurable timeframe, such as on an annual basis, not just over the lifetime of the development.**
- 4. The position of the balancing pond and staff parking area should be swapped to move the potential noise and disturbance from cars away from the residential boundary.**

A copy of the Town Council's earlier objection has been appended to this letter for your reference. We respectfully request that these comments are taken account when determining this application.

Yours sincerely



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Director**

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cc Kate Houlihan, Town Clerk, Raunds Town Council