TOWN AND COUNTRY PLANNING ACT 1990

PROPOSED SUBMISSION PLAN AND THE SUSTAINABILITY APPRAISAL

CONSULTATION OCTOBER TO NOVEMBER 2018

REPRESENTATIONS SUBMITTED BY

MR DAVID ADAMS AND
MR FRANK CUNDELL

AT LAND AT FURTHO PIT, OLD STRATFORD

BY FRAMPTONS TOWN PLANNING LTD

NOVEMBER 2018

PF/9125
CONTENTS

1.0 Introduction
2.0 The Site
3.0 Planning History
4.0 Employment Principle on Promotion Land
5.0 Planning Policy Background
6.0 Estimated Job Creation from 16ha Employment Proposed
7.0 Building Heights
8.0 Transport & Access
9.0 Drainage; Flood Risk and SuDs
10.0 Ecology & Biodiversity
11.0 Noise & Vibration
12.0 Landscape and Visual Impact
13.0 Heritage and Archaeology
14.0 Conclusion – Summary of Benefits
1.0 INTRODUCTION

1.1 Framptons act for local landowners David Adams and Frank Cundell who own the Site at APPENDIX 1. The Site at Furtho Pit has previously been promoted in earlier consultation events relating to the South Northamptonshire Council Part II Plan in June and September 2016 as well as November 2017. This Statement is intended to supplement these previous submissions and address specific queries raised by the Local Planning Authority, as well as update on changes in circumstances that have arisen since the promotion commenced.

1.2 The note seeks to introduce technical supporting information to demonstrate that the site is technically deliverable and capable of satisfactorily meeting the objectives of “South Northamptonshire Council Part II Plan - POLICY RURAL EMPLOYMENT 2: Land at Former Furtho Pit, Old Stratford / Cosgrove” as detailed in the Submission Version Part II Local Plan. This work is ongoing with the relevant stakeholders and is intended to demonstrate there are no ‘show stopping’ constraints that will hinder delivery of employment development on the site.

1.3 The proposed 16ha employment development is located in the western half of the site at Appendix 1, with four distinct zones identified. In total, the Site is 39.8ha with proposed developable employment land totalling 16ha. No development is proposed to the east of the disused former canal, with this half of the site to be set aside as a Country Park with links to the Stony Stratford Nature Reserve to the south of the A5.
1.4 The note provides further comment; justification and detail over the emerging proposals and is structured in the following way:

- Introduction
- Site description
- Site constraints and opportunities
- Planning History
- Principle of Employment Land
- Planning Policy Background
- Market Signals
- Estimated Job Creation
- Building Heights
- Transportation and Access
- Drainage; flood risk and SuDs
- Ecology and biodiversity
- Noise
- Landscape and Visual Impact
- Heritage impact including archaeology
- Summary of benefits
2.0 THE SITE

2.1 The site comprises two distinct character areas. The eastern part largely comprises agricultural land whereas the western part comprises previously developed historic sand and gravel pit which has been infilled with inert material and is effectively brownfield.

2.2 The Dogsmouth Brook forms the northern boundary of the site to the west before being located in the middle of the site. The A508 forms the western boundary and the A5 the southern, with the A5 – A508 roundabout located to the south-west of the Site. And includes the Emmits warehouse; the KJ Pickering Builders Depot and areas where the Promotor’s company ACE Plant used for testing and demonstrating their plant equipment and vehicles. The area to the west also benefits from planning permission for a 2ha of commercial use which is detailed later in this statement. The combination of uses on the western part of the site give the site a less rural visual appearance than the eastern part with the former line of the Buckingham Arm of the Grand Union Canal the clear separating land use. The eastern sections are agricultural in character.

2.3 The Dogsmouth Brook and River Great Ouse form the eastern boundary. The site is within the administrative areas of South Northamptonshire District Council and Northamptonshire County Council. The site is in the Great River Ouse Upper catchment with the watercourses falling within an area managed by the Buckingham and River Ouzel Internal Drainage Board.

2.4 The site generally falls towards the Dogsmouth Brook, with the land south of the brook falling to the north and land north of the brook falling to the south. A high point exists in the western part of the site, related to the gravel works, from which levels fall steeply away. A topographical survey records high points of 79.9m AOD in the northern part of the site and 78.8m AOD in the
southern part. The bottom of the valley, within which the Dogsmouth Brook is located, runs generally from the west to the east of the site, falling from 67.0m AOD in the west to 61.6m AOD in the east where it joins with the River Great Ouse.

2.5 As mentioned briefly previously, a disused branch of the Grand Union Canal (the Old Buckingham arm) runs from north to south through the site within a dilapidated elevated embankment. This has not been in use since the 1930’s and although local volunteer groups have been active in attempting to restore this for many years, there are no formal current plans for restoration. The aspiration for restoration is generally supported in principle by the landowners and the plans for the site, as will become apparent, safeguard the route and will ensure the design of the commercial site integrates with the route as part of the Green Infrastructure. The presence of the canal is seen as a design opportunity in the long term, but the design of the site has been progressed in a manner that it is suitable with or without a functioning canal.

2.6 An existing road, Cosgrove Road, runs south through the site from Stratford Road in the north to the existing commercial premises to the south of the site. In addition, an access track feeds off this to serve the commercial premises within the site and then under the A508 to Knotwood Fields Farm to the west.

2.7 The site is situated close to the confluence of three main roads the A422; A5; and, A508 all of which feed into the nearby Old Stratford roundabout and are locally significant transport nodes. The roundabout at the time of writing these submissions is part way through a significant Highways England improvement scheme which has resulted in many months of improvement road works. The site is situated to the north of the A5 which at this point is a dual carriageway
running from the nearby roundabout to Milton Keynes and the A508 which connects Milton Keynes and Northampton to the west.

2.8 Access to the land is currently achieved off the Old Cosgrove to Old Stratford Road and is shared with Knotwood Fields Farm, KJ Pickering and Emmits to the north of the Site. This roadway joins the Stratford Road which enters Cosgrove village to the east and the A508 passing Brooke Farm to the west. It was closed off when the A5 was upgraded to bypass Old Stratford. A new access has been approved in relation to the 2010 application providing direct access for the Site onto the A508 although this is yet to be implemented.

2.9 In preparation for making these submissions the landowners have instructed the following professional technical reports and plans to show the principle of developing the site in the manner shown is deliverable from a technical perspective (in no particular order): flood risk and drainage (MEC); ecological impacts and biodiversity (Ecolocation); noise and vibration (Inacoustics); utilities and services (MEC); highways and transportation (DTA); landscape and visual impact (MHP) and Heritage and Archeology (Heritage Collective).

2.10 The aforementioned technical work has culminated in the formation of the accompanying UMC (Master Planners) ‘Opportunities and Constraints’ Plan which is included at Appendix 2. This consolidates the applicable constraints and informs the formation of a detailed zonal Master Plan. This builds on the technical work previously submitted to SNC in earlier rounds of the plan formation to demonstrate how the development responds to the site context to deliver 16ha of employment land in a well-planned manner, however it remains a plan and suite of documents that are proportionate to a Local Plan promotion. In time all work will be refined to inform pre-application discussions and EIA Screening and Scoping in advance of a planning application.
2.11 **APPENDIX 2** also provides a summary of all the applicable constraints which are best seen on the plan comprehensively which when applied collectively to a single visual plan, enable the realistically developable areas to be identified.

2.12 The Master Plan produced shows how the site can deliver the following essential components: adequate access; up to 16ha commercial land largely on the parts of the site characterised as being previously developed to the west; a Country Park beyond the canal on the largely undeveloped agricultural land. The Country Park would be a significant planning gain and offers increased public access to the open countryside; an opportunity to upgrade linkages between Old Stratford and Cosgrove; the provision a long-term buffer to the development and safeguard the separation of Cosgrove and Old Stratford. It would be based on the open space network to the South of the river Ouse which is a defining characteristic of Milton Keynes as a planned settlement.

2.13 The UMC Master Plan at **APPENDIX 3 A** upgrades that submitted by the promotors of the site during previous consultations. It is intended to show the developable areas once the constraints such as access; drainage attenuation areas; ecological mitigation; noise sensitive boundaries; topography; flood zones; rights of way; utilities; separation of heritage assets and landscape features have all been considered and sympathetically incorporated into the emerging vision. **APPENDIX 3 B** is a master plan for the Country Park which has been produced by MHP to compliment the zonal master plan and show how the feature could work and integrate into the landscape.
3.0 PLANNING HISTORY

3.1 The land at Furtho Pit has a long and complicated planning history which is summarised by the following section of these representations, however it is the recent planning history which makes the comprehensive promotion of this land sound in strategic planning terms to ensure a piecemeal development approach does not continue on the land.

(ii) Recent Planning History (last 5 years)

3.2 Commercial Development:

• S/2010/0923/MAO – Commercial Development (B1 & B2) – Outline Approved (All matters reserved except access)
• S/2014/0140/MAR – Reserved Matters for the above - Withdrawn
• S/2015/0674/MAR - Revised Reserved Matters for the above – Refused Allowed at Appeal September 2016

(iii) Historic Planning History (to 1974)

3.3 Mineral/Waste Development:

• S/1984/0415/P - Extraction of as raised sand and gravel (hoggin) and infilling with imported inert waste materials. APPROVED
• S/1988/1444/PC - Continued Use For Extraction Of As Raised Sand And Gravel (Hoggin) And Infilling. APPROVED
3.4 Service Station, Hotel Development:

- S/1988/0008/PO - Erection of Restaurant, Filling Station, Lodge, Information Centre with Parking Facilities and Picnic Area (Outline). APPEAL DISMISSED
- S/1988/0009/PO - Erection of Restaurant, Filling Station, Lodge, Information Centre with Parking Facilities and Picnic Area (Outline). REFUSED
- S/1988/1382/PO - Erection of Restaurant, 40 Bedroom Lodge, Petrol Filling Station with Associated Parking Facilities (Outline). APPEAL DISMISSED
- S/1989/0125/PO - Erection of Restaurant, travel Lodge, petrol Filling Station and Information Centre with Parking Facilities (Outline). REFUSED
- S/1989/0867/PO - Erection Of Restaurant, Lodge, Petrol Filling Station, Information Centre With Associated Parking Facilities (Outline) APPEAL DISMISSED

3.5 Service Station, Hotel, Warehouse Development:

- S/1988/1293/PO - Erection of Filling Station, lodge With Restaurant, Lorry Drivers Accommodation Fuelling and Parking Facilities with Hitech/warehouse Units (Outline). REFUSED
- S/1988/1294/PO - Erection of Filling Station, lodge With Restaurant, Lorry Drivers Accommodation Fuelling and Parking Facilities with Hitech/warehouse Units (Outline). REFUSED

3.6 Golf Course Development:

- S/1990/1358/P - Construction Of 9 & 18 Hole Golf Courses, Club House & Driving Range, and Relaxation Of Occupancy Condition On Farmhouse. APPROVED
- S/1993/0697/P - Construction Of 9 & 18 Hole Golf Courses, Clubhouse & Driving Range And Relaxation Of Occupancy Condition On Farmhouse (Renewal Of S901358p). APPROVED
• S/1998/1026/P - Construction Of 18 Hole Golf Course, Clubhouse And Driving Range And Relaxation Of Occupancy Condition On Farmhouse (Renewal Of S930697p). APPROVED
• S/2003/1649/P - Construction of 18 hole golf course clubhouse and driving range and relaxation of occupancy condition on farmhouse (Renewal of S/1998/1026/P). APPROVED

3.7 Temporary Storage:
• S/1993/0685/P - Continued Use Of Land For Storage Of Plant & Machinery Without Complying With Condition 1 (Personal User) On Permission 71/268. TEMPORARY PERMISSION

3.8 Agricultural Development:
• S/1993/0998/AG – Prior Approval for Construction of Access Road. FURTHER DETAILS NOT REQUIRED
• Motor-cross Development
• S/2002/0155/P - Change of use of land to motor cross practice track. REFUSED

3.9 Garden Centre Development:
• S/2006/1147/PO - Garden centre with formation of new access to A508, bus stops, parking and landscaping. APPEAL AGAINST REFUSAL WITHDRAWN

Planning History Summary

3.10 Of direct relevance to this promotion is application S/2010/0923/MAO which approved the relocation of ACE Plant Ltd (a local Plant Hire company part owned until recently by David Adams and Frank Cundell) who sought permission to move their operations from Old Cosgrove Road
Old Stratford to Furtho Pit. The application was in use class terms a commercial development (Use classes B1 and B2) with new vehicular access.

3.11 By winning an appeal APP/Z2830/W/15/3140945 (decision provided with 2016 representations) the principle of further commercial uses on the land and a new access to the land off the A508 is established. Both these factors constitute material considerations.
4.0 EMPLOYMENT PRINCIPLE ON PROMOTION LAND

4.1 In addition to the potential relocation of ACE Plant (permissible via the recent appeal) already on the land are local construction firm KJ Pickering Ltd who are a local building contractor operating from a site compound where they store materials, tools and equipment within the land. This land is rented from David Adams and not owned by KJ Pickering. Also, in the immediate vicinity are Emmits who have a facility where they store, fabricate and repair fairground rides for the entertainment industry. To the immediate north of the site, the site subject of the 2010 application and beyond this is the Dogsmouth Brook watercourse which runs from west to east beyond which is Brooke Farm which includes a number of business premises.

4.2 The site is a highly logical location for a commercial being a gateway site between South Northamptonshire District and the administrative area of Milton Keynes Council. Accompanying the promotion is a letter from local commercial land agents Drake Commercial, who are one of the most active commercial agents in Northampton and Milton Keynes, which examines the suitability of the Site for the range of commercial uses proposed which include B1, B2 and B8 uses. This letter is APPENDIX 4.
5.0 PLANNING POLICY BACKGROUND

5.1 The West Northamptonshire Joint Core Strategy (WNJCS) seeks to deliver a total of 42,670 dwellings over its plan period (2011-2031). In order to maintain a broad balance of dwellings and jobs, and to maintain a diverse economic base, the Strategy has identified a total of 28,500 jobs to be created in parallel over the plan period.

5.2 To deliver this scale of job growth across West Northamptonshire, the Joint Core Strategy seeks to create employment opportunities on a hierarchical basis:

i. Smaller employment sites included within the allocated mixed-use strategic sites;

ii. larger employment sites of around 40ha providing the scale of accommodation to create the opportunity for local businesses to be able to grow and expand, whilst at the same time also delivering sites that would attract new business from outside the District; and

iii. Strategic employment sites over 40ha being located within DIRFT for large scale companies that have a more national reach.

5.3 The promotion being put forward seeks 16ha of flexible employment land and a Country Park as shown on the illustrative Master Plans at APPENDIX 3 A and 3 B.

5.4 This Statement, as an overarching explanatory document, seeks to explain the planning issues in bringing forward the development and assesses the relationship between the development in terms of local and national planning policies. It also aims to contextualise the development in relation to economic objectives included in the WNJCS which will shape the Part II Plan and the guidance contained in the Framework as the Council seek to apply and deliver these requirements at a local level.
5.5 The SNC Part II Submission Plan identifies the Site as ‘Policy Rural Employment 2: Land at Former Furtho Pit, Old Stratford / Cosgrove’. This Policy reiterates that the Site is located at an important position adjoining the A5 and A508, and that the development site provides for 16ha of mixed employment generating development. A variety of employment types will be sought to reflect the need for diversity and resilience in the local economy as expressed in the Council’s Economic Growth Strategy, which is a key part of the Evidence Base underpinning the Part II Plan and future Part I/Core Strategy Review.

5.6 The Policy requires the site to deliver an integrated, coordinated and comprehensive planning approach to be taken for the employment site and a Master Plan must be prepared, in consultation with the District Council, Northamptonshire County Council (which will transfer to any possible future unitary authority) and other statutory undertakers prior to the submission of a planning application covering the development of the whole site. The work accompanying these representations should be seen as the preparation for this requirement and discussion between the landowner’s professional team and the identified stakeholders will continue, with a view to submission of a formal pre-application to resolve detailed technical matters ahead of any planning application. Such an approach will accord with the policy and ensure any mitigation and design factors are resolved.
6.0 ESTIMATED JOB CREATION FROM THE 16HA EMPLOYMENT PROPOSED

6.1 Using the Drake Commercial floor area estimations (see APPENDIX 4), the zones would be potentially capable of delivering the following employment numbers, which have been generated using the accepted industry best practice provided by the ‘Homes and Communities Employment Density Guide 3rd edition from November 2015’.

6.2 Employment density refers to the average floorspace (in m²) per full-time equivalent (FTE) member of staff. It is used as a measure of intensity of building use and an indicator of how much space each person occupies within the workplace.

6.3 Calculating the jobs generated by a particular use or building using employment densities relies upon a consistent understanding of floorspace. To do this proportionate to a Local Plan promotion the following assumptions (which are consistent with the accompanying DTA highways note) breaks down the potential allocation as follows.

6.4 Future development proposals comprise of the following:
   - 500,000 sq.ft (46,452 sqm) of B8 use;
   - 270,000 sq.ft (25,084 sqm) of mixed use B1/ B2/ B8.
   - Restaurants uses (3 x 185 sqm facilities) A3

6.5 46,452 sqm in B8 use would generate in the region of 603 jobs based on an estimated density of 77 jobs per sqm.
6.6 25,084 sqm mixed B1/B2/B8 against ‘Mixed B Class’ on the medium value of 30 jobs density per sqm which would estimate the Site generating around 836 jobs.

6.7 Restaurant uses 3 facilities in use class A3 at 2000 sq.ft (or 186 sqm) would generate in the region of 15 to 20 jobs per facility so if three restaurants, then 45 to 60 additional jobs.

6.8 In total, therefore, the 16ha would conservatively generate employment in the region of 1500 jobs (B8 603 + Mixed B 836 + A3 60), using the HCA estimations. However, this is caveated as being an estimate for Local Plan purposes. Any future application would need to provide significantly more detail on this point through the planning application process and may be subject to alteration depending on the market signals at the time of preparing an application.
7.0 BUILDING HEIGHTS

7.1 It is the intention to construct a high quality, sustainable and functional development should the land be allocated. However, if B1, B2 and B8 uses are to be developed, it is essential that the scale parameters for height are made clear at every stage in the planning process including before specific end users are committed. This will inform along with heritage and landscape considerations where on the site they are acceptable in visual and heritage impact terms. It is considered a range of heights will be sought at the next stage with lower heights closer to the canal and zone D.

7.2 For the zones to the west larger heights are acceptable which accords with the functional requirements of likely end users which will be to deliver a scale of building which meets their operational requirements. In terms of height the reality of this is that building heights will vary, but it should be assumed that heights of circa 8m for 20,000 – 30,000 sq. ft. buildings up to 15m for 250,000 sq. ft. which would probably be the largest building that would be developed at this location.

7.3 The site will only be prominent from the A5/A508/A422 roundabout but such prominence will not constitute a harmful constraint. This is because subject to good design the site has the potential to deliver a gateway site for which attractive prominence is vital. To review the potential impact of buildings of this scale the submission is accompanied by a landscape and visual review from specialist firm MHP which will be considered later in these submissions.
8.0 TRANSPORT

8.1 Once fully operational, any development of 16ha potentially capable of employing up to 1500 people will generate additional traffic upon the local highway network. Accompanying this note is a Highways Technical Note produced by David Tucker Associates (DTA) that has been sent to NCC Highways (NCC) and Highway England (HE) and signed off. The Note includes an access plan for a signalised roundabout (shown on DTA drawing number 16322-04) off the A508 in the location of the permitted T-Junction access associated with the 2010 planning permission. The access strategy and transportation assessment; an addendum note in response to the initial response of NCC and HE and a summary note exploring the evolution of discussions and the position reached with both highway authorities is included at APPENDICES 5 A, B and C.

8.2 The conclusion of the Note establishes that site access can be achieved without detrimental impact on the adjacent highway network. The objective of the Highways Note is to reach a position that NCC and HE can confirm that they agree with that conclusion. Dialogue with both authorities is included at which shows Engineers at both authorities are satisfied with the promotional material proportionate to a local plan promotion.

8.3 In the longer term (such as in support of a planning application) the Site promoters accept further highways work will be necessary in the form of a comprehensive Transport Assessment. However, for the purposes of clarifying a REG19 submission the comprehensive highways Technical Note provided considered a proportionate submission and will give sufficient comfort to those drafting the Part II Plan that there will be no severe highways impacts as defined by the Framework.
9.0 DRAINAGE; FLOOD RISK AND SUDS

9.1 Mewies Engineering Consultants Ltd (M-EC) were instructed by the landowners to produce a Technical Note (APPENDIX 6) considering all flood risk and drainage matters to support the proposed commercial allocation. The purpose of the report is to examine the flood risk to the site from all sources and identify the mitigation measures required to manage this risk. The report also provides a drainage strategy to manage surface water runoff and foul water from the site.

9.2 The M-EC strategy for drainage and flood risk management proposes that the site is split into five catchments. These are based around the four zones identified in the masterplan and an additional catchment for the site wide main access road into the site. This will allow phasing of the development, without the requirement for construction of large amounts of unused infrastructure and complex discharge arrangements.

9.3 Detention basins are proposed within three of the four zones to provide attenuation and water quality improvements. Geo-cellular storage is also proposed in these zones to act in combination and provide further attenuation. In Zone C it is proposed for just geo-cellular storage tank to provide the necessary attenuation.

9.4 Attenuated flows from Zone B discharges into the site wide network that runs along the main access road. Runoff from the site wide network is proposed to be attenuated within an underground storage tank within the highway. A final flow control structure limits the discharge which will then combine with flows from Zones A and C and then outfall into the Dogsmouth Brook upstream of the disused canal crossing. To the north of the brook, discharge limited by a
flow control structure from the Zone D detention basin, outfalls directly into the Dogsmouth Brook, also upstream of the disused canal crossing.

9.5 To summarise the key points of the drainage and flood risk management strategy:

- All development will be contained in Flood Zone 1 and Flood Zone 2 and is therefore sequentially acceptable.

- The main flood risk to the development comes from the Ordinary Watercourse, Dogsmouth Brook. The valley formed by this watercourse also acts as a flow path for overland flows should Wakefield Lodge Reservoir to the north-west fail. Flood risk from groundwater also represents a risk to part of the Site.

- Hydraulic modelling of the brook will be completed in due course to refine flood extents and likely mitigation measures.

- Through the careful location and design of development and other mitigation measures however the risk of flooding should not restrict development.

- The development will not increase runoff or flood risk downstream by utilising a sustainable drainage system. Flows will be restricted to a maximum allowable discharge rate of 3l/s per impermeable hectare providing a betterment up to the 1 in 100 +20% climate change storm event.

- The drainage system can accommodate runoff from the development through the design of five attenuation systems located throughout the Site. These networks will discharge to Dogsmouth Brook at the maximum allowable discharge rate. The total storage volume for surface water is estimated at 10,360m³.

- Foul water flows from the development shall be collected and discharged via gravity, subject to highway and bridge design, to the existing Anglian Water public foul sewer that runs through the Site.
10.0 ECOLOGY AND BIODIVERSITY

10.1 An Ecological Appraisal was carried out on the Site by Ecology Firm Ecolocation during October 2017. This preliminary survey (APPENDIX 7 A) classified all of the habitats present within the site and assessed the potential for protected and notable species in order to inform ecological constraints and opportunities for the proposed works and advises on further survey work to be undertaken.

10.2 The survey, in summary, found that the western side of the site was an old quarry now colonised by tall ruderal, ephemeral and scrub vegetation on uneven ground and spoil heaps, a mosaic of habitats considered to be of low-medium ecological value. The remainder of the site consisted of farmland including four arable fields and two cattle-grazed pasture fields. The cattle-grazed fields were both species-poor and of low ecological value; however, a small area of species-rich grassland of high ecological value was present in the south-western corner, adjacent to the disused canal. This area included a higher botanical diversity in the grassland sward, as well as scattered scrub and mature trees on the steep slope up to the canal and a dry ditch, and had been designated as a county important non-statutory Local Wildlife Site.

10.3 The ecological report concluded that the Site had potential to support protected and notable species. Evidence of badgers was found during the survey in the form of active Badger setts, latrines and foraging signs. A detailed badger survey and impact assessment therefore accompanies this submission (APPENDIX 7 B) and informs the necessary mitigation of any proposed development.

10.4 The mosaic of habitats within the western side of the Site created a diverse height structure with suitable shelter and basking areas for reptile species. As such, further surveys are recommended
as being needed to determine presence or likely absence of a reptile population within the Site and to inform any subsequent mitigation for the proposed works.

10.5 Numerous mature trees were present within the field boundaries, particularly along the stream and along the banks of the disused canal running through the middle of the Site. As such, if any lengths of vegetation would be removed through the proposed works, further surveys for bats must be carried out. This would include an assessment for potential roosts in individual trees to be felled and an assessment of the foraging and commuting value of linear features across the Site if any significant lengths would be removed or affected by lighting.

10.6 If any works I the future are proposed to the stream running through the site, the ecology report recommends that a further assessment be made of the potential for this feature to support otters or water voles in order to inform any necessary mitigation measures.

10.7 It is recommended that, in order to reduce the ecological impact of the proposed works and protect features suitable for protected species, the mature boundary vegetation around the Site edges is retained and protected by a wide buffer and sensitive lighting, in order to ensure that connectivity around the Site is maintained. In addition, it is recommended that the stream is retained and protected by a buffer to reduce the risk of pollution and retain this as a wildlife corridor.

10.8 Given that there will be some loss of low and low-medium value habitats, it is recommended by Ecolocation that the creation of the country park on retained land includes some creation of higher value habitats as compensation for habitat loss through the development. Such habitats could include areas of wildflower meadow or woodland creation, as well as retention and sensitive management of the designated Local Wildlife. The detail of all these mitigation
measures will be progressed as the proposal builds detail through the future pre-application and planning application process.
11.0 NOISE AND VIBRATION

11.1 The technical noise assessment has been produced by acoustic specialists Inacoustic (APPENDIX 8) to provide information to support the promotion to South Northamptonshire Council and is based upon environmental noise measurements undertaken at the site and a subsequent analytical exercise as well as discussions with the Council’s Environmental Health Department.

11.2 Accordingly, the assessment is based upon environmental noise measurements undertaken at the location of the closest noise-sensitive receptors in the vicinity of the site. The assessment has been undertaken for both daytime and night-time periods.

11.3 Noise emission limits have been set for both fixed plant and processes associated with the proposed Development, which will be adopted as design targets and ensure no significant impact upon the amenity of neighbouring receptors.

11.4 A strategic design approach has been recommended, which has steered the master planning principles to-date and will continue to steer the formation of the eventual masterplan; incorporating features that will ensure that any off-site noise effects are reduced to negligible levels.

11.5 The assessment considers the potential noise emissions arising from off-site traffic increases associated with the Proposed Development, which are predicted to comprise no worse than a negligible effect.
11.6 Consequently, the assessment is considered to demonstrate that the Proposed Development can be brought forward with a low impact in the context of BS4142 guidance and that its effects would be within the range of the NOEL category of the NPPG England guidance.

11.7 Since the Proposed Development is considered to feasibly comply with British Standard, National Planning Policy and Local Policy requirements; it is recommended that noise should not be a considered a constraint to the change of allocation of the Site to commercial uses within the Local Development Plan.
12.0 LANDSCAPE AND VISUAL IMPACTS

12.1 This chapter is based on the landscape and visual assessments undertaken by specialist landscape firm MHP whose report in full is included as APPENDIX 9. The report confirms that there are no landscape designations within the study site or immediately adjacent, and other than the existing mature trees and hedgerow there no rare or vulnerable landscape features, or elements of great value identified within the site itself. As a former quarry site, the landscape to the west is heavily disturbed with earth mounding and shaping relating to its former land use. The A5 and A508 reduces the tranquillity of the western portion site with associated noise from frequent passing traffic.

12.2 To the east the landscape is agricultural and has a greater sense of time depth associated with the former canal, established trees and small wooded copse which are evident in this location.

12.3 The landscape to the west is therefore assessed to have an overall low sensitivity to commercial development with opportunities to bring enhancement through development with the introduction of additional native species tree and hedge planting as part of potential future development. The landscape to east is more rural in character and a moderate sense of time depth, as such this area of the study site has a medium sensitivity to development.

12.4 The study confirms that in visual terms the site is generally well enclosed by established vegetation and tree belts. The southern boundary of the site is situated adjacent to a well vegetated roadside cutting which further reduces visibility from potential receptors on the A5 highway. The site is visible from the surrounding highway network at the A5/A508 roundabout where due to existing highways works there are open views into the site due to lack of vegetation and trees.
12.5 The site is not easily identifiable in potential medium distance views from elevated land to
the north and west. There are no identified locations where long-distance views are evident.
Residential receptors are limited to the small number of dwellings on Stratford Road, where
some dwellings are orientated towards the study site. Overall, the site itself is not assessed
to be visually prominent. Identified views are predominantly short distance and local in
nature from Public Rights of Way within the site itself to the south.

12.6 Views from more sensitive areas within proximity such as the Conservation associated with
Cosgrove and the tow path associated with the Canal are obscured and filtered by both
landform and established vegetation and trees. Intervisibility in a summer landscape is
therefore not apparent with no direct identified views during a site visit from these
locations.

12.7 There are limited views into the site from road users and dwellings along Stratford Road, these
are generally glimpsed through existing hedgerow gaps where a lack of existing trees and
vegetation allow. There are limited potential views from the residential edge of Old Stratford
with a well vegetated roadside cutting forming a dense boundary in this location.

12.8 In terms of enhancement opportunities there are opportunities to reinforce the existing
hedgerow and treed boundaries where the development is likely to be most visible from the
local highways. A dense buffer of native planting would provide both significant screening of
proposals for development and also create biodiversity enhancements and contribute to the
Green Infrastructure network in accordance with the aspirations of the local plan. There are
further opportunities for tree planting along the former canal corridor to help preserve its setting
and restore this section of the former canal corridor before it meets with the A5.
12.9 The development of the site provides an opportunity to bring significant enhancement through
the creation of a Country Park which could allow for the potential restoration and re watering
of the former Canal and greater permeability to the existing footpath network linking it with Old
Stratford.

12.10 There are opportunities to introduce a substantial soft landscape scheme in association with the
commercial development itself to help link development proposals with its wider landscape
setting and contribute towards a Green Infrastructure strategy for the entire site.

12.11 In summary, the site is not designated at National or local level and does not fall within an
Area of Outstanding Natural Beauty (AONB), Green Belt or landscape designation. The western
portion of the site has been previously developed, and other than the existing tree and
hedgerow network and former canal corridor has no identified landscape features or
elements of great rarity or value. Although the site is located on the edge of Old Stratford
town, it has a limited sense of association with the adjoining open countryside to the north,
west and east.

12.12 Development provides an opportunity to introduce substantial new native landscape
elements within both the proposed commercial development and the wider proposed
Country Park and as such could provide substantial contribution to the local green
infrastructure network. To give an idea of how the landscape impact could be minimised
and to identify planting opportunities MHP have produced a landscape concept plan which
is included at APPENDIX 3 B.
12.13 Potential landscape effects through development are likely to be limited to the site itself, with successful proposed development responding to the existing character of the site in terms of sensitivities around the existing canal and towards the eastern portion of the site where its more rural character is more sensitive to built form. Development proposals in these locations should ensure that they respond accordingly in terms of materials, finishes and building heights which would complement and enhance its proximity to the Canal corridor.

12.14 Visual effects are likely to be limited to the local highways network and the existing Public Rights of Way within the site itself. Whilst the western portion of the site has capacity to accommodate larger units set within an existing and enhanced well treed site, towards the eastern portion of the site will respond to the more rural setting and as such building heights should be limited accordingly in these locations.

12.15 It is concluded that the site has capacity in landscape and visual terms for the outline development of commercial development proposals and that overall development of a meaningful and substantial landscape strategy is likely to introduce landscape enhancements which will benefit and enhance local landscape character and visual amenity.
13.0 HERITAGE AND ARCHAEOLOGICAL IMPACTS

13.1 Following receipt of detailed comments from Historic England in response to the SNC Part II Pre-Submission REG 18 stage consultation the landowners instructed Heritage Collective and Archaeology Collective to review the proposals in relation to heritage impacts and clarify the impacts of the emerging proposals proportionate to a local plan promotion.

Heritage

13.2 The site is located to the north of Old Stratford, on the opposite side of the A5 road to the village. It is in the vicinity of a number of heritage assets, including The Church of St Peter and St Paul, listed grade I 17 May 1960; Old Wolverton Mill, listed grade II 28 October 1976; the Cosgrove and Grand Union Canal Conservation Areas and the scheduled monument of the Roman Villa, South East of Cosgrove Hall.

13.3 The accompanying Heritage Collective advice note reviews the relevant heritage assets in the vicinity as seen at APPENDIX 10. The note concludes that it is unlikely most of the heritage assets mentioned in the Historic England comments will be harmed by the proposed development. However, there is potential for harm to be caused to the appearance and character of the Grand Union Canal. Zones A and B are the least likely to cause heritage issues and this is where most of the development should be focused. Some heritage issues do arise from the development of Zone C, but it is in Zone D that has the biggest challenges. A sensitive development would be needed in this area.

13.4 The landowners acknowledge that the impact on the setting of the canal will require sensitive consideration at the pre-application design stage and that discussions will need to involve local...
conservation specialists. However, it is submitted that a suitable design and scale of buildings adjacent to the canal can be achieved at the correct stage which will result in a high-quality development.

Archaeology

13.5 The potential for archaeological interest at the site has been considered by Archaeology Collective and recorded in a Desk Based Assessment. The report, provided at APPENDIX 11, has confirmed that the application site does not contain any designated heritage assets such as world heritage sites, scheduled monuments, or registered battlefields where there would be a presumption in favour of their physical preservation in situ and against development.

13.6 A review of historic mapping, alongside documentary research, has indicated that significant parts of the Site have been subject to quarrying and land extraction activities, followed by subsequent refilling and landscaping. This would have truncated archaeological deposits within these parts of the Site. However, there are some areas of the Site which have not previously been impacted and there is the potential for the proposed development to have below ground impacts on any archaeological deposits within these parts of the Site.

13.7 It is considered that the Site is unlikely to contain any archaeological deposits of high significance or value. However, agreeing an appropriate investigation and recording strategy for the undisturbed parts of the site where development will be permitted will require additional negotiation with the County Council Archaeological advisors at pre-application and application stage.
14.0 CONCLUSION – SUMMARY OF BENEFITS

14.1 In summary, the following applies to the land at Furtho Pit that demonstrates the Site to be a highly logical employment allocation for South Northants Council and its Part II Local Plan to meet some of its future employment needs:

- The Site is largely previously developed and has an extensive planning history much of which already permits the principle of commercial uses to the location.
- A precedent has been set previously with the establishment of Emits; KJ Pickering and ACE Plant relocating to this side of the A5 all of which are commercial activities.
- The principle of access to the A508 is permitted by reason of the recent appeal being allowed. Additionally, the comments of the two Highway authorities are supportive.
- The allocation will ensure a comprehensive development of the land negating the historical and somewhat inevitable piecemeal evolution of development on the Site.
- The location of the Site is well related to provide employment required by the Part I Local Plan.
- 16 ha of the uses identified could equate to up to 1500 jobs for the use classes proposed.
- The scale of employment will appeal to small and medium operations thus adding to the employment stock in the District as it has the potential to offer something different to the large scale B8 provision along the M1 and M40 corridors as well as potential rail freight interchanges which are pending at the time of writing.
- The Site is largely previously developed and is no longer suitable for agricultural use, a viable use, such as employment, will therefore bring back to use a derelict and visually unattractive gateway site.
• The site has been made up of inert material (road planings) which prevents agricultural uses but would form an ideal base for commercial building and parking and not contaminated material requiring expensive remediation

• The site offers an opportunity to provide a gateway employment site. This will benefit SNC and Milton Keynes

• The Site is well positioned in relation to major roads including the A422, A5 and A508, three major routes in the sub region, meaning it has excellent appeal to end users backed up by Drake Commercial’s note.

• The Site is well connected to labour forces such as the residents of Milton Keynes; Towcester, Buckingham and Roade as well as a host of villages in the vicinity of the Site.

• The Site has sustainable access to Cosgrove and Old Stratford as well as the significant urban area of Stony Stratford and wider Milton Keynes.

• The Site will offer a genuine employment opportunity capable of offering employment to the future populations of the major strategic housing allocations under construction and permitted in nearby settlements such as Roade, Deanshanger, Pottersbury and Old Stratford some of which (particularly Roade) have lost large employment Sites to accommodate the recent housing growth.

• The allocation of the Site will enable environmental and ecological benefits such as Green Infrastructure which will improve the quality and habitat potential of the Site and surrounding area improving it from its current position which is largely derelict.

• The Site will retain hedges; designate landscape buffers and demonstrate a net biodiversity gain. Ecological constraints can be addressed by design and relocation of Badgers under licence to the proposed country park.

• Drainage and flood risk management is deliverable and will enable each zone to be able to drain independently thus offering maximum flexibility in phasing terms.
• There is developer interest to initial enquiries which makes satisfying the Framework’s requirement for a willing landowner and a willing developer.

• There are no ransom issues and access can be achieved without regards to any third-party interests.

• Access off Old Cosgrove Road would be limited to pedestrian and cyclists with all vehicular traffic accessing off the new access directly onto the A508. This will reduce potential for traffic conflicting with existing minor routes in the vicinity of the Site.

• The scheme sympathetically integrates heritage asset in the form of the old Canal giving it sufficient separation whilst making a feature of the old route. The emerging proposals are a sympathetic starter for ten design which the landowners accept will require additional liaison with the Council and stakeholders to deliver a satisfactory application in the future.

• The scheme is comprehensive a requirement of the Local Planning Authority to initial pre-application enquiries.

• The Site is out of the Dogsmouth Brook flood plain and any risk of contamination can be controlled through interception as was agreed for the 2010 planning application for ACE Plant.

• The provision of a large country park will provide significant open space provision; access to the countryside; links to existing facilities and a long-term transition from the employment to other uses.

• The scheme will improve connectivity for pedestrian and cycle facilities by making existing routes connect and providing new routes to land previously not accessible to the public.

• There is an opportunity to connect to the MK Redways system, which will provide traffic safe and desirable access to a multitude of directions of travel in Milton Keynes.
• Noise concerns can be adequately mitigated through design at the appropriate stage.

• Archaeology is destroyed on the western part of the site and in other areas can be controlled at application stage to ensure any interest is recorded or appropriately dealt with by the future application.

Framptons

November 2018