



# WARMINGTON PARISH COUNCIL

Sarah Rodger, Clerk to the Council  
Springside, 15 Station Road  
Nassington, PE8 6QB  
Tel: 01780 435084  
clerk@warmington.org

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## **Planning Ref: NE/22/00698/OUT. Thrapston Business Park**

Warmington Parish Council (WPC), as the elected representative of the local community, objects to the above planning application that seeks to develop a storage and distribution centre on agricultural land east of Thrapston. The objection is based on the following material planning considerations:

- Government policy
- Traffic
- Highway safety

### 1) Government Policy

“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.” National Planning Policy Framework (NPPF), 2021, paragraphs 2 and 47.

a) Although North Northamptonshire Joint Core Strategy 2011-2031 (NNJCS) is under review, as highlighted by the applicant within the Planning Statement, this process is in the very earliest stages. NPPF paragraph 50 states: “Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination”. This planning application should therefore be considered against the current NNJCS development plan that was adopted in 2016.

- The proposed development site is not identified as a logistics development location within the democratically agreed NNJCS. The proposal is therefore a deviation away from the development plan, and should not be permitted.

b) The applicant highlights within the Planning Statement that there has been a significant increase in demand for logistics floor-space since the adoption of the NNJCS, and that the extant plan makes provision for logistics development under Policy 24 if certain criteria are met. WPC does not believe that this application demonstrates sufficient justification for the planning decision to deviate from the NNJCS.

Market demand does not support the application for further logistics development, and it is highly questionable that the type of jobs that the proposed development would provide is likely to be filled by the local population. Evidence of which is provided below:

- Far from being slow to recognise the growth of this sector, Northamptonshire has seen a huge rise in transport and storage premises over recent years. According to figures from the Office of National Statistics (ONS), West Northamptonshire has the most transport and storage premises in the UK (3,200) and North Northamptonshire had the third highest at 2,700 (BBC, 13 April 2022, [West Northamptonshire has most warehouses in UK say ONS - BBC News](#))

- The applicant suggests that further logistics development would provide significant employment opportunities for the local area. SEMLEP (South East Midlands Local Enterprise Partnership) of which Northamptonshire is a member confirm the high demand at national and local level for logistics premises, but has also highlighted current issues with filling available roles. It found that, as of November 21 there were 15,787 vacancies in the sector, an 87 per cent increase compared to the beginning of the pandemic in March 2020. These vacancies, it concluded, were magnified by the loss of some EU workforce following Brexit and concluded there were shortages for warehouse staff and drivers at all levels (NN Journal).
- A recent article (Northamptonshire Telegraph, 08/04/2022) highlights that a London-based recruitment agency, GIG, has applied for permission to erect modular accommodation units as an 'innovative way to ensure staff are able to come to work in Corby from all over the country' and as an alternative to the current situation where workers are accommodated in the nearby Holiday Inn. GIG states also that many businesses across the town struggle to find staff now that there are fewer European workers. This article reiterates the fact that warehouse developments will not provide employment opportunities for local people.

c) Not only would the proposed development deviate from the NNJCS, if permitted it would result in the permanent loss of best and most versatile (BMV) agricultural land.

The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made within the planning system, aiming to protect the BMV agricultural land from inappropriate or unsustainable development proposals. Furthermore, the NPPF (National Planning Policy Framework, 2021) states that: "Planning policies and decisions should contribute to and enhance the natural and local environment by .... (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland" (Chapter 15, paragraph 174)

The proposed development site currently comprises agricultural land in arable use (ES Chpt 15 'Agricultural land & soil resources), including 10.1 ha of very high-quality land (grade 2), 17.4 ha of high-quality land (subgrade 3a) and 21.3 ha of lower quality land (subgrade 3b and grade 4), all of which would otherwise remain in arable use. The report states that "there is likely to be a direct, permanent, long-term adverse effect which is considered to be major" (paragraph 15.41), in relation to the areas of higher quality agricultural land and an additional adverse effect in relation to the permanent loss of lower grade land (paragraph 15.43).

- Aside from the detrimental impact on the countryside, the environment and rural life, the permanent loss of arable land at a time when climate change, food security and geopolitical concerns are shaping future national policies is of great concern.
- Unless such speculative development is considered within a wider context, the Nation's agricultural land will be lost to vast swathes of warehouses simply because a site is close to the strategic road network. The applicant is aware of a proposal by Newlands Developments to develop a logistics and distribution warehousing on a further 71 hectares of designated agricultural land at Thrapston. Together these two proposals would amount to the loss of 120 hectares of agricultural land.
- It is the responsibility of Local Planning Authorities to consider such applications against their impact on the national as well as county requirement for food production.

d) The NPPF (National Planning Policy Framework, 2021) also states that "Planning policies and decisions should contribute to and enhance the natural and local environment by: (a) protecting and enhancing

valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)” (Chapter 15, paragraph 174)

The site is within the Upper Nene Valley Gravel Pits Special Protection Area (SPA) Buffer (3km/4km), and is bordered by the Nene Valley Nature Improvement Area (NIA). The western part of the Site falls within an SSSI Impact Risk Zone for the Aldwinckle Marsh SSSI.

- Development of the proposed site would have a detrimental ecological impact and is not supported by NNJCS Policy 4 - Biodiversity and geodiversity.

e) Within the NNJCS the role of Market Towns such as Thrapston is described as being to “provide a strong service role for their local community and wider rural hinterland”, and the scale of development “will be related to existing commitments, the current and potential capacity of infrastructure and services, regeneration needs and the character of the town”. Development requirements are seen as being “met through a combination of the re-use of suitable previously developed land and buildings, Sustainable Urban Extensions and other committed sites, and smaller greenfield developments identified in Part 2 Local Plans or Neighbourhood Plans”.

- The proposed development does not comply with NNJCS Policy 11 (The network of Urban and Rural Areas).
- A logistics development of the size (58.30 hectares) detailed in the application, adjacent to the historic Market Town of Thrapston is not only inappropriate, but also detrimental to the character of the town and surrounding rural area.
- The site would be adjacent to the proposed Newlands Development. Together this would amount to 133.13 hectares of warehouse and distribution development on land not identified for such development on the NNJCS

The NNJCS describes open countryside as "A living, working countryside providing the green setting for the network of settlements and supporting the area's self-reliance and resilience through food production; leisure and tourism; biodiversity resources; renewable energy; flood risk management and carbon capture."

Within paragraph 3.21 it states that landscape character “provides the setting and context for development, and is also a key element of the urban/ rural character of North Northamptonshire, including the transition from settlements into the countryside”. Although the applicant has suggested a range of mitigation measures in an attempt to reduce the impact of the development it is non the less in conflict with NNJCS Policy 3 (Landscape Character) “Development should be located and designed in a way that is sensitive to its landscape setting, retaining and, where possible, enhancing the distinctive qualities of the landscape character area which it would affect”.

The proposed development site is not identified as a logistics development location within the democratically agreed NNJCS and cannot be justified under Policy 24. Furthermore, it would result in the permanent loss of BMV agricultural land, and is in conflict with policies 3, 4 and 11 of the NNJCS.

This planning application is not supported by government planning policy.

## 2) Traffic

a) Although close to the strategic road network, near to Junction 13 of the A14 corridor and with the A1 Motorway 16km to the east at Peterborough “access to the Site is well provided for via the local highway network” (Planning Statement, paragraph 2.9), this being the A605. It should also be noted that the previously mentioned Newlands Developments proposal would be accessed from the A605 if permission were granted, as would their additional application for distribution and warehouse premises at the

Peterborough end of the A605. Together this amounts to 618,000m<sup>2</sup> gross internal area (GIA) of logistics development potentially accessed from the A605.

The Thrapston Business Park application is relevant to, and a concern for, all villages located along the A605 due to the detrimental impact that the inevitable increase in traffic volume would have, and that would exacerbate the problems already faced by the rural communities that it connects.

- The A605 forms a link between the A45 / A14 Junction 13 at Thrapston that connects the Midland region and the national motorway network (via the M1 and M6) with the A1 at Huntingdon, and the A1(M) Junction 17 at Peterborough, which forms part of the north-south strategic highway network between London and the north. As a 'primary' route, rather than part of the Strategic Road Network, the majority of the A605 between Peterborough and Thrapston is managed and maintained by Northamptonshire Highways / North Northamptonshire Council (NNC).
- The A605 is a single-carriageway road (apart from the short section at the Peterborough end). The national speed limit (60mph) applies to the majority of the route although there are 40mph restrictions at short sections near Thrapston, Thorpe Waterville, Oundle and Elmington.
- The Major Road Strategy (NNC, 2013) states that the A605 'is also used as a short-cut by some trunk road traffic in preference to the higher-quality, but less direct A14 and A1(M)'. Given that this short-cut reduces the journey by approximately 30 miles, the rising cost of fuel and the pressure on time, it is unsurprising that the A605 has become increasingly busy. It also negates any assumption that that traffic to / from the proposed development would use the longer strategic road network if travelling from or onwards to Peterborough or the M1 north.

Northamptonshire Major Roads Strategy provides annual average daily traffic flow data at two villages along the A605, although these do not take into consideration logistics developments on un-designated land accessed from the A605.

- In 2012 this was 16,638 (18% HGV) at Barnwell and 18,356 (16% HGV) vehicles at Warmington.
- By 2026 traffic flow was forecast to be 22,000 (at Barnwell) and 28,000 at Warmington.

According to the Transport Assessment the current annual average daily traffic flow (21,516) on the A605 north of Oundle Road (seen to be the most representative ATC location).

b) From data contained within table A8.5.2 (Operational traffic movements) of the Noise Assessment it has been established that the proposed development would generate 8920 vehicle movements, of which 2736 are HGV's (approximately 30%). The applicant envisages that 10% of LGV's and 9% of HGV's would be traveling along the A605 north of Oundle Road to / from the proposed development - although given that the A605 has been shown to be such an important link road, this assumption is considered to be fairly conservative.

The Transport Assessment, submitted on behalf of the applicant concludes that "the additional traffic associated with the proposed development would not have a material adverse impact on the safety or operation of the local road network" (paragraph 6.70), however:

- The proposed development would result in an average increase in daily traffic flow of approximately 900 vehicles, of which 250 are HGV's.
- Information taken from the planning application relating to the Newlands Developments (Thrapston) proposal indicate a further 1475 daily vehicle movements (133 of which HGV's), and the "A1 West" Newlands Developments site off the A605 adjacent to the A1(M) is very conservatively estimated to generate a further 230 vehicles (85-138 HGV's) using the A605.

- For Warmington, and other villages located off the A605 between Thrapston and Peterborough, the three applications detailed above have the combined potential for generating an additional 2,600 vehicles (500 HGVs) on the A605 on a daily basis.
- It is also noted that the proposed development, together with the developments mentioned above, would be operational 24 hours a day. The impact on local communities in the form of increased traffic flow, noise and pollution, would not just be experienced at peak times.

c) The proposed development has the potential to increase traffic flows significantly on the A605, yet mitigation is restricted to the immediate area of the development through the remodelling of the existing A605/ Oundle Road roundabout and a new simple priority junction onto Oundle Road. The applicant has failed to consider the significance of increased traffic flow along the length of the A605 corridor as a result of the proposed development, and the cumulative impact of all similar proposed developments.

d) For villages located along the length of the A605, of which Warmington is one, the emissions and noise resulting from the volume of traffic is already evident and has a detrimental impact on both the environment and human health. The current volume of traffic on the A605 means that even minor disruption results in stationary traffic; major incidents on the A14 and A1(M) results in severe congestion.

During 'normal' conditions, the volume of traffic makes it problematic to exit Warmington when this involves crossing the steady flow of on-coming traffic throughout the day. Increasingly, residents are exiting the village via the roundabout rather than the Peterborough Road T-junction due to the difficulties and safety issues associated with crossing the A605 – although this is also becoming similarly challenging as one waits for a break in the flow of on-coming traffic. This has an impact on traffic flows within the village and also within and between neighbouring villages, as the ability to join and safely cross the A605 increasingly influences the routes taken.

Oundle and Peterborough provide important services for the rural community of Warmington. Since the bus service ceased to enter the village the only option for local residents wishing to utilise public transport is to use the bus stops located on the A605. On a return journey this involves pedestrians crossing the A605, which can be problematic due to the constant flow of traffic – not to mention dangerous, especially for the elderly and those with mobility issues.

NNJCS (Policy 10: Provision of infrastructure) requires satisfactory infrastructure to be in place to support new development. The highway network, specifically the A605, cannot adequately accommodate further increases in traffic flow safely, without a detrimental impact on the rural communities that are connected by it.

### 3) Highway Safety

a) The applicant has obtained Personal injury collision data (PIC) from NNC for the five-year period up to and including August 2021. Details of incidents within a very limited area immediately surrounding the proposed development site have been outlined within section 3.4 of the Transport Assessment, which concludes the road accident data shows there are “no significant issues that warrant further investigation”.

- The applicant has failed to recognise that the A605 between Thrapston and Oundle is a designated Red Route based on information collated by Northamptonshire Highways and Safer Roads Alliance, and has made no assessment of the impact on safety of increased traffic flow.
- Data from Crashmap, relating to reported collisions on the A605 between Thrapston and the junction with the A1(M) at Peterborough (2016 – 2021) has been found to show 113 injury collisions of which 6 were fatal and 18 serious.

Within Northamptonshire, the A605 is a single carriageway road largely subject to the national speed limit although some short sections are subject to 40mph restrictions. It is recognised as a dangerous road and an increase in traffic flow as a result of undesignated development elevates local concerns over safety, especially at the junctions that connect the rural villages located along the A605 corridor.

### Conclusion

Warmington Parish Council objects to the above planning application as the proposed site is not allocated for development of the type proposed within the local plan and cannot be justified under policy 24.

Furthermore, to allow such development would contradict a number of policies within the approved NNJCS including policies 3, 4 and 11. To deviate from the democratically agreed Local Plan would create a strong precedent and mean that no area of the countryside that is adjacent to a primary road is safe from similar, speculative developments. In addition, the increase in traffic flow on the A605 - and associated safety concerns - that the development would generate will have a detrimental impact on the communities of Warmington and surrounding villages, and the local road network.

While it is recognised that the Thrapston Business Park application has to be assessed on an individual basis, WPC would also stress the importance of considering this application within the context of similar planning applications that have been submitted, and that the cumulative impacts are taken into account.