SCHEDULE OF PLANNING APPLICATIONS – ITEM 7

APPLICATION: S/2007/1622/CW
Location: Land north of Saxon Avenue Grange Park

RECOMMENDATION: That the West Northamptonshire Development Corporation be advised that the Council does not object to the principle of an appropriate mixed-use development on this site. However, the Council does OBJECT to this application on the grounds of significant under-provision of employment floorspace, poor (pedestrian) linkages with the surrounding area, inadequate provision made for infrastructure needed to serve the development (including health, education, transport and indoor/outdoor playspace) and that the effects of traffic noise and pollution have not been adequately addressed. A copy of this report to be forwarded to WNDC for further information regarding the Council’s views.

Should the West Northamptonshire Development Corporation be minded to approve the scheme, it is requested that consideration also be given to including the following conditions with any permission granted:

1. Samples of materials.
2. Full landscaping/planting details and a landscaping management scheme.
3. Details of any boundary fencing proposed.
4. Details of a scheme for secure and covered parking of bicycles.
5. Implementation of submitted Travel Plan.
6. Compliance with mitigation measures set out in Environmental Statement and Flood Risk Statement.
7. Phasing to ensure employment development is built in tandem with the rest of the development.
8. Site investigation regarding contamination and archaeology.

S/2007/1622/CW

WARD: Grange Park
WARD MEMBER: Cllr Tharik Jainu-Deen & Cllr Peter O'Leary

This report relates to a statutory consultation, received from the West Northamptonshire Development Corporation, which is the Local Planning Authority in respect of determining the submitted planning application. (An ‘outline report’ on this item, was included in the agenda for the meeting, and Members should note that the “Recommendation – Approval” included at the beginning of that report was in error and should be disregarded.)
1. INTRODUCTION

1.1 This report relates to a consultation received from the West Northamptonshire Development Corporation (WNDC), which is the Local Planning Authority in respect of the submitted planning application. The site consulted upon is located at Grange Park and lies entirely within the South Northamptonshire Council (SNC) administrative area. The application is to be determined by WNDC because of the scale of the development proposed.

1.2 The site is undeveloped and comprises areas of scrubland and grassland, and extends to about 9.3 hectares, and is located at the southern entrance to Grange Park. It is within the southern employment area (Employment Zone C) on the Grange Park Development, immediately adjacent to M1 Junction 15 and the A508.

1.3 The site is highly visible from both the motorway junction and surrounding area, constituting an important “gateway” into Grange Park (and Northampton). The A508 runs along the western boundary of the site, Saxon Avenue to the south and east and the former refuse tip lies to the north. Between the site and the refuse tip is a tree belt on elevated ground, which also contains a public footpath. The trees in the tree belt are the subject of a Tree Preservation Order, as is a group of trees just beyond the north-east corner of the site, and a belt of trees within the site adjacent to the A508.

1.4 On the opposite side of Saxon Avenue, to the east, lies the Grange Park District Centre, whilst to the south lie the Holiday Inn Express hotel as well as a further hotel under construction. On the opposite side of the A508, to the west, is a further hotel (within Northampton Borough). A public right of way runs along the northern boundary of the site from the A508 to Saxon Avenue, at the level of the trees.

1.5 There are existing access points into this site from a roundabout on Saxon Avenue (which also serves two hotels, six large warehouses and a small office development) and at the north-east corner of the site.

1.6 In line with the development allocation, the site has previously been levelled and has the two potential vehicular access points already created. The spoil from the levelling process remains on site in a mound located in the south western corner, but otherwise the site is largely flat.

2. PLANNING HISTORY
2.1 1997 - An outline planning brief for Grange Park was approved in September 1997 and this included an illustrative development concept plan and extensive supporting material relating to design principles. A design & development brief specifically for the employment areas was subsequently prepared, as required by the outline permission.

2.2 1998 - Outline planning permission for the development of Grange Park was granted in May 1998, comprising about 1000 dwellings as well as 30ha of employment uses (within classes B1 Business, B2 Industry and B8 Warehouse) together with a district centre (retail, social and community uses), recreation facilities, park and ride facility, open space and country parks with associated access, parking and landscaping (App Ref S/1997/0219/PO). Prior to the grant of outline planning permission a Section 106 Agreement was completed and this contains comprehensive planning obligations relating to the implementation of the development.

2.3 2001 - Permission was granted in February 2001, following a reserved matters application, for production facilities with offices and storage and an office building, with associated access, parking and landscaping (App Ref S/2000/1437/PR). The intended occupier was “Marconi Caswell”, but the permission was not implemented and has expired.

2.4 2002 - In September 2002 an application for the erection of a large non-food retail store (Use Class A1), and the intended occupier was “IKEA” (App Ref S/2002/1254/P). An appeal was subsequently lodged against non-determination of the application, but this was subsequently withdrawn by the applicants. (Members did, however, indicate that had they had the chance to determine the application, they would have refused it on retail impact, design/appearance and highway impact grounds.)

2.5 2005 - In June 2005, permission was granted for an effective ‘extension of time’ for submission of reserved matters applications, in respect of Zone C, until 12 June 2007 (App Ref S/2005/0513/P).

3. PROPOSAL

3.1 An outline planning application has been submitted to WNDC for a development of up to 450 dwellings, up to 10,500m$^2$ of office space (Use Class B1a) and a 150-bed hotel (Use Class C1) with associated access, parking, open space and landscaping, with all detailed matters reserved for latter approval.

3.2 The key elements of the proposed scheme are as follows:

- Up to 10,500m$^2$ (gross) of B1(a) office space
- Provision of a four star 150 bed hotel
- Up to 450 dwellings (35% of which are to be ‘affordable housing’)
- Provision of an area of open space
- Provision of residential, office, hotel and open space uses, in the general location illustrated on the Land Use Plan
- Retention and incorporation in the scheme of areas of preserved trees (within the site boundary) to the north and west
- Provision of a pond within the central open space for drainage and habitat purposes
- A series of defined maximum building heights is confirmed by the Building Heights
Plan

- Provision of two vehicular access points at the Saxon Avenue/Cheaney Drive roundabout and at the access north of the Saxon Avenue/Wake Way roundabout (as shown on the Access and Movement plan), and provision of a spine road linking these two points of access.

3.3 An illustrative masterplan and phasing plan have also been provided to demonstrate how the amount of development might be delivered on the site. It is important to note that these illustrative plans set out a potential solution for delivery of development, but the detailed layout of the site, and indeed breakdown of mix and size of residential units, for example, will be progressed at reserved matters stage. The submitted Design Codes document sets out the design rationales and principles, which will guide any future reserved matters applications. More details of the *residential, hotel, employment, access & parking, landscaping and infrastructure delivery* elements of the proposed development are provided below.

*Residential Development:*

3.4 Up to 450 homes are proposed. These are proposed to be accommodated on areas spanning from the north west of the site round to the south east (as demonstrated by the Land Use Plan). It is proposed that the residential development should range from 2 to 5 storeys in height, with a mix of unit sizes and tenures distributed across the site. Whilst the illustrative masterplan and accompanying Design and Access Statement demonstrate how this might be accommodated, it will be for any future reserved matters applications to take this forward in detail.

3.5 Sustainability has also been a key design issue and it is proposed all the dwellings will be designed to ‘Sustainable Homes Code 3’ and achieve ‘Building for Life Silver Standard’.

3.6 In terms of affordable housing, 35% of the homes delivered through reserved matters applications will be affordable. This quantum has been agreed and developed in partnership with both SNC and WNDC and is intended to be secured through a Section 106 or other legal agreement. It is proposed that in the first phase of residential development, 70% of the affordable homes will be social rented and 30% shared ownership. This directly reflects the demand recorded by SNC Strategic Housing. The split of tenure, size and type on further phases will be agreed at the relevant time. The provision of affordable housing is detailed further in the submitted Affordable Housing Statement.

*Hotel Development:*

3.7 The proposed hotel would occupy a landmark position at the south west corner of the site. It is proposed that the hotel will take the form of a landmark building comprising 150 bedrooms of 4-star quality. In addition, associated facilities are also proposed including a restaurant and gym. An integral element is that these two associated facilities would be open to the general public for use, with the size of these facilities to be controlled by condition/future reserved matters applications.

3.8 The exact design of this building will also be controlled through any subsequent reserved matters applications. However, it is proposed that the hotel will be a maximum of 7 stories (plus plant) in height and reflect the contemporary high quality environment to be provided.

3.9 ‘Golden Tulip’ has been identified as the proposed occupiers of the hotel. Golden Tulip are an international brand with 150 hotels worldwide, and in the UK, have flagship operations at Old Trafford in Manchester, and a soon to open facility in Bournemouth. Golden Tulip has identified the application site as ideal to further enhance their brand’s profile. Further detail is included in the Employment Land Assessment and Design Code documents. In terms of sustainability, it is understood
that it will be a requirement that the hotel achieves a BREEAM very good rating.

Employment Development:

3.10 Up to 10,500m² (gross) of commercial office (B1a) space is proposed. The illustrative masterplan indicates that this could be accommodated through a series of 3/4 storey buildings, in a landscaped environment. The amount of employment floorspace proposed has been given detailed consideration by the applicants and their consultants and been subject to market analysis (further justification is provided in the submitted Employment Land Assessment).

3.11 The eventual design will, to some degree, be dictated by the needs and demands of local headquarters type operations that are intended to occupy these buildings, and they will therefore be of contemporary design, and provide flexible space.

3.12 The commercial floorspace will obtain a BREEAM rating of very good and will provide at least 10% of its energy needs from on site renewable/low carbon sources, albeit the choice of those sources will only be determined through any later reserved matters applications (refer also the accompanying Sustainability Statement). Further details of the employment proposals including the design rationale, are set out within the submitted Design and Access Statement and the Design Codes.

Access and Parking:

3.13 Vehicular access to the site will be provided from the pre-existing access points from Saxon Avenue to the south, and off Saxon Avenue to the east. No new vehicular accesses will be created. A spine road will link these two access points, albeit the route of that road will be determined through any reserved matters applications, and is only shown indicatively on the plans.

3.14 In addition to the main spine road, it is likely that a further series of routes through the site will be provided for both vehicular, pedestrian and cycle access. However, the design intention is that vehicular routes are minimised and pedestrian and cycle routes are prioritised. Further detail on this point is set out in the submitted Design and Access Statement.

3.15 In relation to parking, it is intended that on-site car parking will be restricted to at or below the maximum permissible standards to encourage sustainable transport choices being made. This can be further controlled through condition/S.106 Agreement.

3.16 Full travel plans have been prepared to guide the commercial and residential elements. The various uses will have different travel demand patterns, and it is therefore appropriate to operate two plans, although there would also be a number of common elements. These travel plans set out a series of measures appropriate to residential and commercial occupiers in seeking to reduce the need to travel by car. For example the residential travel plan includes measures such as welcome packs, travel vouchers, car sharing and limited car parking. Both plans also set out the arrangements for travel plan implementation and monitoring.

Landscaping:

3.17 A landscape strategy has been developed (set out in full in the Design and Access Statement). This confirms the approach to be taken to all elements of hard and soft landscaping on the site, in order to inform the detailed design.

3.18 In summary, the objectives of the strategy are to create a series of high quality linking open spaces that deliver a contrasting range of character neighbourhoods. The central open space proposed is a key component, which forms a focus of the scheme. The primary landscape principle is to create a sweeping park running from east to west through the centre of the site. The submitted plans demonstrate how this park will be overlooked by much of the housing, with various green corridors linking
the surrounding neighbourhoods.

3.19 Wooded areas (subject to Tree Preservation Orders) abut along the western and northern boundaries and constitute the only existing vegetation assets identified as being worthy of retention. As such it is proposed to manage and enhance the woodland fringes within the site, creating a ‘woodland setting’ for housing near the northern and western site boundaries.

Infrastructure Delivery

3.20 An extensive package of Section 106 developer contributions is proposed, but in summary, a ‘per residential unit’ tariff approach is proposed to secure contributions for the following areas:

- Strategic infrastructure (roads, public transport real-time bus information, enhanced bus services, NHS beds and revenue, police (strategic), green infrastructure, strategic flood attenuation measures, education (all levels))
- Local infrastructure (Primary Care Trust payments, social care), Community Development (public open space, footpaths and cycle paths, multi faith provision, youth provision, libraries, voluntary sector, work in the community)
- Emergency Services (police and fire)
- Other matters (burial land, waste management, sustainability innovation funds, public realm, public art, cultural activities, town centre enhancement, leisure, CCTV, wildlife, employment co-ordinator and S.106 monitoring)

3.21 In addition, the applicants have confirmed that further payments will be agreed towards:

- Community facilities
- Playing fields
- Travel Plan Co-ordinator
- Infrastructure required as a result of the commercial floorspace

3.22 The applicants consider this to be a comprehensive package that would provide as fully as possible for the infrastructure requirements of the scheme.

Phasing:

3.23 An indicative plan has been submitted to demonstrate how development of the site might be phased. It would be the intention that each phase (or combination of phases) was the subject of a reserved matters application.

3.24 The current intention is for the park, roads, hotel and one commercial parcel and the first parcel of residential land to come forward in a timely manner, soon after any approval of the outline application. As indicated at Para. 3.9, above, Golden Tulip are likely to progress a reserved matters application for the hotel, in the short term, as a separate exercise. The intention is for development to begin later in 2008 and for the residential elements to be completed in 2014. However, this timescale is driven by anticipated rate of sale. The office floorspace is intended to be built in phases, each phase being released when demand dictates.

3.25 The accompanying Environmental Statement provides for a series of mitigation measures, some of which are intended to be secured by condition. A list of conditions, suggested by the applicant, has been submitted. However, some of the mitigation measures and commitments may be sought by way of the S.106 Agreement.

3.26 The application is supported by the following submitted documents:
• Planning Statement
• Employment Land Appraisal
• Statement of Community Involvement
• Design and Access Statement
• Design Codes
• Tree Survey
• Transport Assessment and Travel Plan
• Health Impact Assessment
• Waste Audit
• Environmental Statement, Technical Appendices and Non Technical Summary
• Sustainability Statement
• Open Space Assessment
• Affordable Housing Statement
• Heads of Terms for Section 106 Agreement
• Design parameters for noise barrier

3.27 The application was also the subject of a presentation to SNC Members, by the applicants, their agents and consultants, at a briefing held in the Council Chamber, on 10th January, this year.

4. CONSULTATIONS
4.1 A number of departments at SNC, including Planning Policy, Environmental Health and Strategic Housing, have been consulted by WNDC. Copies of their responses, as well as other responses received by WNDC to statutory consultations, have been forwarded and are therefore reported for Members' information. Any updates will be reported at the Meeting.

4.2 **SNC - Planning Policy:** State that the site is allocated for employment use in the South Northamptonshire Local Plan (GPE1) which is a ‘saved’ policy. The planning brief approved in September 1997 and the outline planning permission granted in May 1998 both show this site designated for employment use within a wider mixed use development. This development, although planned and predominantly developed pre RSS8, complies with the guidance in terms of locational and sustainability criteria. The site is acknowledged as forming part of the Northamptonshire Implementation Area (RSS8: MKSM - Northamptonshire Policy 2) which sets out targets for housing and employment growth as well as the need to create sustainable communities.

4.3 Clearly the focus within the WNDC area is to deliver the growth agenda in terms of housing requirement. PPS3 places a requirement on local authorities to ensure a 5-year supply of housing land within their area. The recent Housing Land Availability study undertaken for the NIA identifies both committed and identified sites within the urban area which are suitable, available and achievable for development. This assessment, based on information as of 1 April 2007, shows a 4.55 year supply of housing land within the NIA. The 0.45 year shortfall equates to 624 dwellings. This application proposes some 450 dwellings on an allocated site and would go some way to overcoming the current housing shortfall and could take pressure off the local planning authorities when considering some of the more strategic sites currently being put forward for development in the Core Strategy, and enable assessment of these sites to ensure the most sustainable ones are identified.

4.4 Despite the pressure for residential development in the area there is also a requirement for employment growth. When originally planned, the Grange Park development envisaged some 1000 dwellings and associated employment provision. Clearly the number of dwellings built has far exceeded this, and the amount of employment opportunity to provide a more-sustainable community and reduce the need to travel has not been realised. Therefore in order to seek to create a balanced community in terms of employment opportunity and housing it is considered that the proposal fails to provide sufficient B1 employment floorspace. There should be more employment floorspace, and this could be best-located on the part of the site fronting Saxon Avenue (opposite the Holiday Inn Express).

4.5 The applicant has submitted a case showing the development of the whole site for B1 use would not be viable. In order to consider the loss of part of the site from employment use we would need to be satisfied that the level of employment growth required within the NIA can be met on appropriate sites elsewhere within the NIA. This information needs validating from an independent source. However, it would seem clear that given the existing employment sites and the expansion of other sites within the NIA, it seems likely that the NIA has sufficient existing or proposed employment land to serve some of the existing and short term future requirements of the area and that the loss of part of this site can be justified. Any additional land required in the medium / long term could be identified through the Core Strategy. It is worth noting that the proposed B1 (Office) uses will generate more jobs than the previously proposed B8 (Warehouse) uses, which were rejected by SNC and WNDC, and that the proposed hotel, whilst a leisure use, will also provide additional and varied employment opportunities.

4.6 Given the size of the site and the number of residential units and office floorspace proposed, a Section 106 Agreement will be required to comply with the SNC
Developer Contributions SPG. The ‘Heads of Terms’ submitted as part of the application already covers some of the key issues as well as a number of additional areas. It should be noted that previous information submitted by external organisations has underestimated requirements of the site, and it’s important that this does not happen again.

4.7 In summary the site is allocated in the Local Plan and is considered suitable for development. Subject to being satisfied that there is sufficient capacity elsewhere in the NIA to support employment growth in the short term, there is no objection to the loss of part of this potential employment land to other uses on the site. There is a need for a 5-year supply of housing land and there is a current shortfall within the NIA.

4.8 **SNC - Heritage and Leisure:** No response received to date.

4.9 **SNC - Strategic Housing:** Make the following comments.

4.10 **Strategic Fit:** One of the strategic aims of South Northamptonshire Council Housing Strategy 2005 – 2010 is to increase the supply of affordable housing. A provision of high quality local housing is also a key priority in the Performance Plan 2007/08.

4.11 Northamptonshire falls into the Milton Keynes South Midlands (MKSM) area. Therefore there will be significant levels of development, including a substantial increase in housing provision, in various strategic sites across the district. Grange Park has been identified as a site which will contribute to the additional housing required.

4.12 **Housing Needs:** The South Northamptonshire Housing Market and Needs Assessment (2005) and the West Northants Housing Market Assessment (2007) highlight the increasing shortfall of affordable housing across the district. There is also strong evidence of an unmet housing need at a local level. This has been identified using data on the current levels of affordable housing in Grange Park, the turnover of these properties and the household formation of those currently on the housing waiting list for Grange Park.

4.13 There are currently 167 housing association properties in Grange Park. These consist of:

- **28 x 1 bed flats (rent)**
- **28 x 2 bed flats (rent)**
- **22 x 2 bed houses (rent)**
- **51 x 3 bed houses (rent)**
- **6 x 4 bed houses (rent)**
- **1 x 2 bed flat (shared ownership)**
- **19 x 2 bed houses (shared ownership)**
- **12 x 3 bed houses (shared ownership)**

During the past 12 months 5 units have become available for re-let. These consist of 3 x 2 bed flats and 2 x 3 bed houses.

With regard to housing waiting list applicants, there are currently 212 applicants requesting to be re-housed in Grange Park. To break this down further all applicants are asked to state their preferred area to be re-housed in. 74 applicants have stated that their preferred area is Grange Park. There is a housing need across all property types; however the need is more acute for 1 and 2 bedroom flats.

Collectively all of the housing needs data indicates that there is a strong need for affordable housing in Grange Park. This includes units for both rented and New Build
Home Buy.

Registered Social Landlord Details: Midsummer Housing Association.

Other Comments: Affordable Housing Statement – The Strategic Housing Team supports the content of this document, however they have identified an error at paragraph 2.15. This states that the Council’s SPG suggests no more than 20 units are to be clustered together when in reality this is 10.

4.14 **SNC Environmental Health:** Note that their records indicate that this site (Zone C) was designated as an employment zone for a number of reasons including it’s exposure to high noise levels from road traffic using the A45 and M1, and its proximity to other industrial/commercial uses including a former waste disposal site that had previously been established on land close by. They also make the following comments regarding noise and contamination.

**Noise**

4.15 The assessment detailed in the Environmental Statement covers all the potentially significant noise sources likely to affect the site or sensitive receptors likely to be affected by noise arising from the proposed development and these have been undertaken in accordance with the relevant standards and guidelines. Results from the applicants own noise measurements correlate well with those found from previous assessments, and which have revealed that it is exposed to high levels of noise falling between NEC “C” and “D” designations as per PPG24. However, whilst it is argued that mitigation measures can be applied to reduce the level of exposure it should not be overlooked that even with the proposed acoustic barrier, the site will still fall within an NEC “C” designation. Furthermore, any noise insulation measures for individual dwellings will only achieve the “reasonable” internal ambient noise criteria recommended in BS8233 for preserving restorative and sleep conditions in living rooms and bedroom spaces, and that is only if windows/doors are kept closed and an alternative means of ventilation needs to be provided to maintain the protection.

4.16 The high level of noise for the site also means that outdoor community living areas will be subject to values exceeding the World Health Organisations “serious annoyance” criteria for outdoor living spaces, albeit it is recognised that some additional screening may be provided by means of acoustic shadow zones that will be created by the presence of the buildings themselves. Concerns are expressed regarding the degree of exposure for the proposed development, even with implementation of the noise mitigation measures recommended in the assessment. Since this is questionable from a sustainability perspective and particularly given that the Government will be publishing it’s “National Ambient Noise Strategy” this year which will seek to reduce the degree of community exposure to high levels of environmental noise issues, it is recommended that consideration should only be given to residential dwellings in this particular location, if there are no more-suitable alternative sites available.

**Land Contamination**

4.17 EHO records indicate that the area was formerly used as a landfill which resulted in a degree of land contamination occurring. We are generally satisfied that the assessment has been undertaken in accordance with the relevant guidelines and standards. It is noted that naturally occurring elevated levels of radon and carbon dioxide gas were found throughout the site, with localised areas of ground contamination, but not to a significant magnitude. It is noted that Carbon Monoxide readings were identified at a number of the sampling locations (WS102, WS103, WS105 and WS107), and although no specific source was identified EHO records indicate that a landfill fire was previously reported there, which would warrant further investigation being undertaken by the developer, working closely with the relevant
authorities in order to ensure any health and safety risks were minimised.

4.18 Despite the above, the report advises that it should be possible to remediate the situation to acceptable standards subject to implementation of a Remediation Strategy as approved by the Environment Agency and Local Planning Authority respectively. More detail will need to be provided regarding the specific remediation options required for specific locations including details of how any works will be validated once completed. Vigilance will be required during any such ground-works and this should be provided by personnel experienced in contaminated land issues. Such matters would need to be conditioned in any approval granted for this development.

4.19 Any comments there may be regarding air quality, are to follow.

4.20 **Grange Park Parish Council**: State that they represent views of local residents and would like to advise West Northamptonshire Development Corporation that they strongly object to the proposed development for the following reasons.

Government and Regional Policy (most notably PPS1, PPS3 and RSS 8 Policy MKSM Northamptonshire Policy 2: Northampton Implementation Area) promote the development of mixed use sustainable communities. In particular the RSS Policy states (extract):

*New development will be delivered through a combination of urban regeneration and intensification and the development of new sustainable urban extensions……*

- ‘provide an adequate choice of high-quality employment sites for targeted office and high-value knowledge-based industries and for existing key sectors, making a realistic assessment of the prospects for continuing use of older sites and including an appropriate degree of mixed use on suitable sites, both new and existing’
- reduce the need to travel by integrating land use and transport planning, reviewing the need for new orbital and other roads, achieving a step change in the attractiveness of public transport within the urban area,
- provide for suitable urban extensions (without reference to local authority boundaries) clearly linked, where appropriate, with the completion of any key items of necessary associated infrastructure;
- identify an appropriate number of existing and possible future District Centres (urban hubs) to form sustainable sub-centres for shopping and for the provision of commercial and social services, giving an emphasis to regeneration needs and opportunities for urban renaissance where relevant;
- achieve a better quality of new development throughout the urban area, including strategic improvements to the public realm, and sympathetic design of the edge of the urban area and the surrounding countryside;
- provide for additional primary health and social care services within existing primary care outlets, in bespoke new healthcare centres within the sustainable urban extensions and within new and expanded community hospitals;
- expand, reconfigure and modernise secondary healthcare facilities as required to ensure sufficient capacity;

1. **Local Plan** - Within the Local Plan (Policy GPH1 and Inset 32) and supplemented by the Grange Park Development Brief it states that Grange Park is to accommodate 1000 dwellings and associated employment and infrastructure provision. We have already exceeded the amount of dwellings by 50% now having 1585 houses but no additional infrastructure or employment opportunities have been provided to ensure a more sustainable community. The proposal is also contrary to Policy GPE1 and Inset 32 and the Grange Park
Development Brief as the proposed site is designated for industrial and commercial development (Class B) development.

2. **Education** – Major concern is that our current Primary School (Woodland View) is already oversubscribed and will not be able to accommodate any additional pupils from the above development. It has already been extended to provide 3 temporary buildings since the school opened five years ago. Our local catchment area secondary school (Caroline Chisholm) also struggles to accommodate all the children currently within Grange Park. Our current pre-school facilities already have a waiting list of 90 and are therefore unable to accommodate any additional families.

3. **Transport/Highways** - Traffic congestion at the M1 J15 and A45 is already a problem especially at peak times resulting in a 20-25 minute queue to egress Grange Park. By phasing the timing of the lights and adding another set will not elevate this problem as the proposed development will create additional motorists all wanting to exit/enter Grange Park at peak times.

4. **Sewage** – The foul water system currently installed at Grange Park is insufficient to accommodate the number of existing dwellings. This was demonstrated in 2006/07 when the existing system backed up and resulted in sewage seeping into resident’s properties. This system has already been expanded to accommodate the Barrett constructed households; the District Centre; the Residential Care home and the office and warehouse development at the other end of Saxon Avenue.

5. **Health** – We believe that our local Doctors and Dentist facilities are already oversubscribed and are having to turn away new applicants.

6. **Integration** – This site is surrounded by light industry /commercial buildings and therefore to put residential properties within this site would segregate them from the already existing community and associated facilities.

7. **Residents** - The local residents demonstrated their strength and depth of feeling at our recent full council meeting, where approx. 200 residents attended to voice their dissatisfaction to the development especially the lack of infrastructure which is being proposed.

8. **Conclusion** - The requirements of both national, regional and Local Plan policy to create a balanced community in terms of employment opportunity, housing and other key services and facilities has not been realized and the proposed development offers nothing to help redress the existing imbalance brought about by the development if over 1500 dwellings. If this above proposal were to be granted then the addition of further dwellings would only put more pressure on an already inadequate infrastructure and fail to provide sufficient employment opportunities. A revised scheme containing significantly less housing and increased employment and community facilities provision should be sought.

If WNDC are minded to grant permission for this development, then GPPC would be seeking developer contributions through S.106 or other agreements for all of the above including education, health, open space, landscaping provision / maintenance and sewage, etc.

**4.21 NCC Growth Management - Planning Policy:** Comments cover the following:

Regarding *school provision*, further discussion will be needed between NCC, the developers and stakeholders. (The Highway Authority has responded separately –
see Para 4.22, below.) There are implications for Fire & Rescue service infrastructure, and S.106 contributions will be required (risk assessment required for fire hydrants). Regarding Police revenue costs, the use of S.106 contributions to meet needs, will be required. The residential development proposed should include innovative play space and not just fixed play equipment. S. 106 contributions towards library facilities, public art and the provision of affordable housing in accordance with West Northants Housing Market Assessment, will be required. Archaeology - South Northants Local Plan policies and current status are in question, and trial trenching will be needed to assess impact - applicant needs to secure implementation of programme of archaeological work.

4.22 **NCC Sustainable Transport (Highways):** Note the following. Office units will be difficult to serve by public transport, as there is no orbital bus route serving Northampton - walking / cycling would not be an option as it is too remote. The hotel will attract more cars, and the generally poor accessibility of the site, and provision of 450 residential units will also generate more car trips. There are no bus services within 400m walking distance, which is a normal requirement of NCC. The Transport Assessment (TA) should demonstrate sufficient services and facilities to make this a more sustainable location. Note no retail, leisure, healthcare or education facilities to be provided on-site. NCC has a requirement to achieve a 20% modal shift away from private car use. Applicant’s consultants have used very old traffic count data, and the scope of the TA was not discussed with NCC. The consultants do not appear to have used accurate future traffic data in their report. Two access points to the site are considered sufficient. Currently consider that the proposals are contrary to local, regional and national transport policy and guidance.

4.23 **Highways Agency:** Comment as follows. Model used to assess impact of development on the operation of M1 Junction 15 needs to be revalidated to current traffic conditions (technical note provided - Faber Maunsell Technical Note 3 - trip generations and distributions have been revised for land uses proposed, and this demonstrates that traffic growth has been underestimated). The TA submitted does not take into account previous comments made on sustainability measures and the travel plan. Mayer Brown (applicant’s consultants) have not revalidated 2005 TRANSYT Model, and a planning appraisal and environmental response are to be provided in due course.

4.24 There are currently unresolved transportation issues, and the application has insufficient information for a substantive response from the HA. Environmental Statement (ES) fails to take into account NBC Air Quality Management Area, where A45 and A508 join the M1. ES does not refer to most up to date Air Quality Standards from 2007, ES fails to mention regional emissions, and no assessment of vehicular CO₂ or other regional pollutant emissions has been undertaken. Noise - ES report highlights measurements insufficient to be relied upon, and noise readings were taken within school holiday periods which is far from ideal. Unclear if noise from M1 and Junction 15 has been accounted for, therefore additional information needed to confirm impact of development.

4.25 **Anglian Water:** Note that the applicant will need to make a request under the appropriate section of the Water Industry Act.

4.26 **Environment Agency:** No comments received to date.

4.27 **East Midlands Development Agency:** Comment that the application should be assessed against the framework for growth in the MKSM sub-regional strategy. There is a need to ensure adequate provision for infrastructure and community facilities, a range of units should be provided including adequate provision for affordable housing. The built environment needs to integrate climate change considerations, and high quality design and environmental standards need to be applied. Note that the supply and quality of employment land needs to be adequate
to support the intended housing growth, and that transport proposals need to be brought forward in a sustainable way.

4.28 **National Grid - Eon Infrastructure Services:** Note that there are overhead lines and underground cables bordering the site.

4.29 **British Pipeline Agency:** Comment that the proposal will not affect BPA pipeline responsibilities.

4.30 **Northants Primary Care Trust:** Public Health Directorate - Need for community facilities has not been addressed, PCT would require S.106 contributions to address any shortfall. There are potential infrastructure capacity failings, no affordable leisure facilities, no plans to address facilities for young people, no provision for garden allotments and/or market gardens. Air quality in construction phase, and once site is developed, cannot be determined, and any contaminated land mitigation measures must satisfy Environmental Health requirements. Agree with recommendation for radon gas and land gas protection measures. Noise nuisance during construction to be prevented, noise barrier to be assessed to satisfy Environmental Health requirements. (The PCT have negotiated an extension of time to make further comments.)

*Finance & Performance Directorate* - Population growth and health provision – the PCT will need to be assisted with means to meet all NHS services provision (through S.106). Further negotiations may need to consider alternatives in providing resources to deliver healthcare, the HIA is being reviewed by Public Health – further comments to follow.

4.31 **Health Protection Agency (East Midlands):** Comment on air quality, contaminated land, radon gas, land gas, and noise issues.

4.32 **English Heritage:** Have no comments to make.

4.33 **Crime Prevention Design Adviser:** Comments as follows. Concerned about public safety, more detail required to reduce crime and anti-social behaviour, problem with segregating pedestrian & cycle routes from vehicular traffic, boundary between public and private realm of central park to be clearly defined, no access to rear gardens. Sustainability Code for New Homes 3-star rating should be met (needs to have planning condition). Parking areas for hotel and commercial to be entered for ‘safer parking award’ (condition required), parking courtyards to be secured by access control systems, and dwellings to be fitted with intruder alarms.

4.34 **Natural England:** An Ecological Management Plan will need to be submitted and approved, and consider that green infrastructure issue has not been fully explored.

4.35 **Wildlife Trust:** Consider the ecological information to be insufficient and incomplete. Insufficient biodiversity information received to make any informed comments. It is unclear if green infrastructure has been fully-considered, as the principles of green infrastructure have not been applied to design/layout. Soft landscaping should include only native species, trees to be felled need to be considered for their biodiversity / ecological value, etc. There is a need for a Construction Ecological Management Plan and Ecological Management Plan to be implemented, and WNDC should require the applicant to agree how future management of Green Infrastructure features will be secured.

4.36 **Sport England:** Note there is no provision for indoor and outdoor facilities for sport and physical exercise, at this stage. Suggest planning conditions and S.106 Agreement to ensure adequate amenity space, play facilities, playing fields and indoor recreational facilities are to be provided.

4.37 **The Ramblers:** Are concerned about the future of public footpath LF2 – consider that the footpath should be improved at the Saxon Avenue end.
4.38 **Brian Binley MP:** Comments that more public amenities need to be provided first, that schools, doctors and dentists are already at capacity, and shopping facilities inadequate.

4.39 **Cllr Bernard Ingram (NCC):** Notes that services and infrastructure for existing Grange Park development do not meet local needs. A further 450 homes would add to this problem, and primary schools that serve Grange Park are at capacity.

4.40 **Cllr Tharik Jainu-Deen (SNC):** Infrastructure cannot cope with more residential development, drainage issues, roads cannot be adopted, healthcare overstretched, school at capacity, Junction 15 traffic congestion, land was designated for commercial use.

4.41 **Cllr Sally Townsend (SNC):** Comments that this site is not identified for residential development, that the primary school is already over-subscribed, and questions the need for another hotel in the immediate area. Considers that sports facilities, including a swimming pool, would be preferred, and would welcome some shops and restaurants as part of the development.

4.42 **Halcrow Group Ltd on behalf of Marston’s Plc:** Note that Local Plan Policy GPE1 allocates the application site for employment use. Say that Policy E4 states that planning permission will not be granted for change of use, and that the application is not in accordance with the adopted local plan, and consider the site should be developed for an employment use (B1, B2 or B8).

4.43 **Star Planning & Development on behalf of Bovis Homes:** Proposal would result in a reduction in supply of employment land for Northampton, and the wider needs of the community should be considered for employment use. Potentially means Greenfield land elsewhere, would have to be released for needed employment development. Consider this to be sufficient reason to refuse planning permission, and that the merits of the proposed development should rather be tested via the emerging Local Development Framework.

4.44 **Grange Park Residents Action Group / GPRAG / GPACT:** Raise concerns regarding the following. School overcrowding, doctors and dentists already over-capacity, loss of employment land, change of original proposed land use, impact of development on status of Grange Park, integration problems, impact on investments, exacerbate anti-social activity, noise and air pollution, access to Grange Park, capacity of Junction 15, increased traffic, Saxon Avenue shortcut, multiple-storey flats not in keeping, lose sense of community and village feel, concerns over potential numbers of children and teenagers, lack of youth facilities, vandalism and petty crime with no extra policing provision, development will make commercial centre more central and a natural hub for congregation, no need for another hotel.

4.45 **Neighbour Notification:** WNDC (and the applicants) have undertaken extensive consultation with the local community, including at pre-submission stage. The main comments and issues raised by them are set out in summary, below:

- More housing not wanted, school full to capacity, doctors and dentist would be unable to cope, traffic congestion, another hotel not required, leisure facility preferred.
- School, doctors and dentist will be unable to cope, clarify need for hotel, high multi-storey residences out of character, leisure facility required, traffic issues, easier accessibility required along with more greenery and trees.
- Site is designated for commercial use, current sewerage system fails, schools, doctors and dentist surgeries over subscribed, traffic congestion, environmental impact, leisure facilities preferred, another hotel not required.
- School is over-subscribed, doctors and dentists full, affordable housing gives rise
to anti-social behaviour and crime concerns, housing values, traffic congestion, another hotel not required, sewerage capacity.

- No additional provision for primary and secondary school places proposed, no plans to enlarge/improve Junction 15 interchange, provision for medical cover, construction of 3/4/5-storey residential units doesn't fit with existing village, sewerage system not adequate, would prefer commercial, office and leisure facilities, and not another hotel.

- Proposal does not appear to support the planning strategy for this site - land use changed from commercial, no need for another hotel, parking provision, traffic management, local centre facilities won't cope, school over-subscribed, leisure facility more welcome and/or commercial use, not clear re storm water balancing or SUDS schemes to protect downstream water courses.

- Traffic management, no provision for extra medical facilities, no proposal for a new school, sewerage issues already evident, surface water run-off causing flooding, no need for another hotel, land designated for commercial use, transport analysis report is flawed, Junction 15 congestion, Woodlands School over-subscribed, emergency access problems, over development of Grange Park village.

- Grange Park cannot accommodate another 450 dwellings, as roads, school, sewerage, health provision cannot serve existing population.

- Schools, doctors, dentist and sewerage facilities already over-subscribed, questions re health impact assessment and PPS1, no need for another hotel, 5-8 storeys is not in keeping with village, problems with vehicle access at Junction 15, no cycle and pedestrian access, M1 Junction not adequate, TA of October 2007 and proposed site-traffic calculation wildly in error, health, education or leisure facilities or commercial use would be preferred.

5. POLICY

5.1 The Development Plan for the site comprises the Regional Spatial Strategy (RSS8), and the ‘saved’ policies contained in the Northamptonshire County Structure Plan and the South Northamptonshire Local Plan. Section 36(6) of the Planning & Compulsory Purchase Act 2004 requires a planning application to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.2 National Policies:

The following Planning Policy Guidance Notes/Statements should be taken into
consideration in the determination of this application.
PPS1 – Sustainable Development (2005)
PPS3 - Housing (2006)
PPG4 – Industrial and Commercial Development and Small Firms (1992)
PPS9 – Biodiversity and Geological Conservation (2005)
PPG13 - Transport (2001)
PPG16 - Archaeology and Planning (1990)
PPG17 - Planning for Open Space, Sport and Recreation (2002)
PPG24 – Planning and Noise (1994)
PPS25 – Planning and Flood Risk (2006)

5.3 **Regional Spatial Strategy 8 (East Midlands) Policies:**
1. Regional Core Objectives
2. Locational Priorities for Development
3. Sustainability Criteria
4. Promoting Better Design
13. Spatial priorities for development in the Southern Sub-Area

5.4 **Northamptonshire County Structure Plan Policies:**
GS5 - High quality Design and Sustainable Development
GS6 - Provision of Infrastructure, Services and Facilities
T3 - Transportation and Access Requirements
T9 – Parking Standards
T10 – Parking for Housing

5.5 **South Northamptonshire Local Plan Policies:**
G3 – General Policy
H7 – Affordable Housing
H8 – Affordable Housing
EV1 – Design
EV21 – Landscape Features
EV24 – Species Protection
EV25 – Wildlife Corridors, Rivers, Waterways
EV29 – Landscape Proposals
EV31 – Public Utilities
R10 – Amenity & Play Areas
IMP1 – Planning Obligations
GPE1 – Industrial and Commercial Proposal

5.6 The South Northamptonshire Local Plan (Policy GPE1) states that permission will be granted for appropriate industrial and commercial development at Grange Park, in
the manner specified in Chapter 13 of the Plan. This, in turn, identifies approximately 30ha of land for mixed employment purposes.

5.7 The Grange Park Development Brief for Employment Areas, effectively divides ‘Zone C’ (the application site) into two parcels of land (west and east) and allocates these respectively for “prestigious headquarter enquiries within Use Class B1” and for “high quality Class B uses (so long as no adverse environmental effects will result)”.

6. APPRAISAL

6.1 The main issues to be considered include:

- The principle of development and the development plan, including the growth agenda, potential loss of employment land and need for further residential development.
- Design, visual impact and relationship to the surrounding area and the rest of Grange Park.
- Transport - including highway safety and traffic capacity issues
- Infrastructure provision
- Sustainability issues
- Environmental impacts including noise, air quality and light pollution.
- Flood-risk and drainage issues.

_Principle of development, growth agenda, loss of employment land and need for housing_

Principle:

6.2 The applicants have sought to demonstrate that there are sufficient benefits arising from the proposed scheme to justify a more-flexible application of development plan policies, in this case. The site is allocated for employment development and a scheme for development was previously approved in 2001, but not implemented (refer Para 2.3, above). The principle of development has been established and the consideration of this application should, therefore, relate principally to the acceptability and implications of the type and form of development now proposed, as well as its potential contribution to the further development of Grange Park and the ‘growth agenda’.

6.3 Since the adoption of the Grange Park Development Briefs (1997-99) and the Development Plan, the position of Northampton in the regional context has evolved. The Government’s Sustainable Communities Plan, and the promotion of the MKSM growth area marked a change in relevant policy. The East Midlands Plan (RSS8), now expects that the Northampton Implementation Area (NIA) as part of the MKSM area should deliver 31,500 homes between 2001 and 2021, with 37,200 new jobs in the same period.

6.4 In view of the above, a commercial / residential / leisure mixed-use development of this site (although contrary to its allocation in the development plan) could be considered acceptable, in principle, provided the right balance is struck between the three main uses proposed. Equally important would be the provision of adequate additional infrastructure for the development and its proper integration with Grange Park, as a whole.

Growth Agenda:

6.5 There is now increased pressure at all levels for the provision of more housing and jobs, which has promoted a re-evaluation of some potential development sites, such
as this. The type and mix of development now proposed could represent a better use of this land, in seeking to contribute to the requirements of the growth agenda, than an employment-only development. Despite permission previously granted, the site has not contributed at all to the growth of the region to date, and a mixed-use development could provide the opportunity to actively contribute to these aims. This is a key ‘gateway’ site which has remained vacant, while development of the rest of Grange Park has come forward around it.

6.6 This 9.26 ha site is allocated for employment use in the South Northamptonshire Local Plan (Policy GPE1) and is a saved policy. The planning brief approved in September 1997 and the outline planning permission granted in May 1998 both show this site designated for employment use within a wider mixed-use development. This development, although planned and predominately developed pre RSS8, could comply with the guidance in terms of locational and sustainability criteria. The site now lies within the West Northamptonshire Development Corporation area for determining planning applications and is acknowledged as forming part of the Northamptonshire Implementation Area (RSS8 MKSM Northamptonshire Policy 2) which sets out targets for housing and employment growth as well as the need to create sustainable communities.

Employment Land:

6.7 There is a requirement for employment (as well as housing) growth, in the MKSM Growth Area. The number of dwellings already built at Grange Park (1600 approx) has far exceeded the number originally envisaged and planned for (1000 approx), and sufficient employment opportunities to provide a more-sustainable community and reduce the need to travel have not been realised. If the current proposal were to go ahead, this could add another 450 dwellings to Grange Park, resulting in twice the number originally planned for (i.e. about 2000 rather than 1000). Equally, there would be even less employment floorspace than originally planned, but about twice the number of residents.

6.8 The applicant has submitted a case to show that the development of the whole of the application site for employment use would not be viable. In order to consider the loss of part of the site from potential employment use it would be necessary to be satisfied that the level of employment growth required within the Northampton Implementation Area can be met on appropriate sites elsewhere within the NIA. Any such information would need to be validated from an independent source.

6.9 However, given existing employment sites and the expansion of other sites within the NIA, it seems likely that the NIA could have sufficient existing or proposed employment land to serve some of the existing and short term future requirements of the area and that the loss of a part (but not all) of this site might be justified. Any additional land required in the medium to longer-term could be identified through the Core Strategy. The proposed B1 offices should generate more jobs than the previously proposed B8 warehouse use; and the proposed hotel, whilst a leisure use, could also provide some additional local employment opportunities.

6.10 To achieve a more-balanced community in terms of local employment opportunities and housing, it is considered that the proposal in its current form fails to provide sufficient B1 employment floorspace. There should be more employment floorspace (and, by implication, less residential), and this could probably best be located on that part of the site fronting Saxon Avenue, opposite the Holiday Inn Express and the existing employment development in Cheaney Drive.

6.11 Should WNDC be minded to grant permission for the scheme as proposed (or in a revised form), it will be important that the employment/commercial development comes forward in parallel with any residential development of the site. This should be addressed through the Section 106 Agreement and/or appropriate conditions
attached to any planning permission.

**Housing Land:**

6.12 The major focus within the areas within WNDC’s remit is to deliver the Growth Agenda in terms of housing requirement. PPS3 places a requirement on local authorities to ensure a rolling 5-year supply of housing land within their area. The recent Housing Land Availability study undertaken for the NIA identifies both committed and identified sites within the urban area, which are suitable, available and achievable for development. This assessment (based on information as of 1 April 2007) indicates a 4.55 year supply of housing land within the NIA. The 0.45 year shortfall equates to some 624 dwellings.

6.13 The current proposal includes some 450 dwellings (on an allocated development site, as opposed to a Greenfield site) and could help in addressing the current housing-land shortfall in the Northampton Implementation Area. It might also take some of the pressures off local planning authorities, when considering some of the more strategic sites currently being put forward for development in the Joint Core Strategy process, and enable proper assessment of these sites to ensure that only the most sustainable and appropriate locations for development are identified.

**Design, visual impact and relationship to surrounding area**

6.14 The proposal is for a sustainable, mixed-use development marking a key gateway to both Northampton Town and South Northamptonshire. The built form of the development is also intended to create a bold new entrance feature to Grange Park. The scheme comprises a mix of residential, hotel and employment/commercial accommodation which radiates from a central linear park. The park could provide an attractive and convenient amenity space, a range of ecological habitats and a potential green link with the existing Grange Park community.

6.15 A striking ‘landmark’ hotel of contemporary design is intended to form the centrepiece of the ‘Grange X-change’. This would be a new commercial quarter for Grange Park, containing contemporary office buildings, as well as new leisure facilities (within the hotel) open to the wider community. A varied yet cohesive townscape, united by a high quality public realm and contemporary architecture drawn from an understanding of local buildings and materials, is intended. A wide variety of homes set in a series of diverse ‘character areas’, from parkside to the retained woodland edges, and connected by an attractive network of streets and spaces, is proposed.

6.16 Massing principles for the development are intended to respond to the various site conditions as well as character areas that would be established. These include:

- hotel of up to 8-storeys (including plant) at the prominent entrance to the site and adjacent to Junction 15 of the M1 motorway
- the creation of a ‘gateway’ (up to 4-storeys) at the main vehicular entrance to the site from Saxon Avenue
- the creation of key landmark buildings (up to 4-storeys) at key locations, for instance, the south east corner of the site and the existing roundabout on Saxon Avenue
- the creation of a 3/4-storey frontage to the linear park maximising accommodation adjoining the park and helping to create a ‘flow of movement’ through the development
- the provision of 2/3-storey houses within the development as well as some 2-storey mews courtyards
- a 3-storey commercial parcel flanking the hotel and creating boundary edges to Saxon Avenue, the A45 and the linear park
6.17 The following are proposed townscape characteristics, based on the submitted illustrative plan:

- **Landmarks**: Landmark buildings help to reinforce a legible layout. The hotel, as a taller building, is located at a strategic location of activity and would form a major gateway building for Grange Park.

- **Focal points**: These will be important buildings due to their location. The parkside apartments form focal points, in particular, at the entrance to the commercial parcel.

- **Key groups**: These are important buildings grouped together at strategic locations. In the proposal, these are at the main entrances to the site off the roundabout as well as at the end of a key local view.

- **Local vistas & views**: These are set up within the scheme and are down the residential streets, either terminating in a key building group, or allowing views to filter through to the existing and enhanced landscape.

- **Key frontages**: These are identified as the parkside buildings, where enclosure is important. These significant buildings are to be located adjoining the major public realm area.

- **Gateways**: These are important locations where buildings form a significant entrance to the development. An important gateway is the main entrance to the site from the roundabout on Saxon Avenue.

- **Key view**: This is a view of significance either into the site (view from M1 Jct 15) or through the site. (View from south entrance to park and view from the District Centre through the park to the hotel and commercial parcels.)

- **Open space feature**: This is centrally located and linear in form, for maximum benefit.

6.18 The illustrative and supporting information provided with this outline application, appears to show the potential for a generally well-designed, high-quality scheme. However, details of key linkages to the district centre and surrounding area are not clear and seem poorly considered. Given that these would be critical to the success of any mixed-use development of the site, that includes such a large element of residential development, Members may wish to indicate to WNDC that any consideration of approving the application should be dependent on this issue having first been fully-addressed.

**Transport, highway and traffic issues**

6.19 The illustrative scheme submitted is based on a direct access and movement strategy which attempts to maximise permeability of the site and accommodate (without encouraging the use of) the private motor car. This strategy is based on the following principles:

- maintaining the two existing vehicular access points into the site to try to minimise the effect of additional traffic on the existing network

- the main street (or spine road) is intended to branch off into a hierarchy of roads within the development

- the design of the internal street system could incorporate built form and landscape
measures to encourage lower traffic speeds (20mph zones)

- the proposed arrangement of the public open space is likely to promote a reasonably legible network of attractive and safe pedestrian/ cycle routes within the site, but connections with the adjoining Grange Park district centre and the surrounding area are less clear and seem not to have been properly considered

6.20 A variety of design approaches is intended to ensure that the car is securely accommodated, but does not dominate the public face of the development. The illustrative parking strategy demonstrates how the car could be dealt with, as follows:

- all residents’ parking in safe, secure areas - parking courtyards & garages, with well lit and overlooked streets
- visitors’ parking conveniently dispersed throughout the site within safe, overlooked public streets or in lay-bys at the edge of open spaces
- residential parking should generally be at a maximum ratio of 1.5 spaces per dwelling
- the commercial car parking areas to be divided into sections using landscape and boundary treatments/conditions to minimise any visual expanse of vehicles

6.21 The Highways Agency has commented adversely on the proposals, regarding the model used to assess impact of the development on the operation of M1 Junction 15. When trip generations and distributions have been revised for the land uses proposed, this demonstrates that traffic growth has been underestimated by the applicants. There are also currently unresolved transportation issues, and the application has insufficient information for a substantive response from the HA. The Environmental Statement does not refer to the most up to date Air Quality Standards from 2007, and fails to mention regional emissions, and no assessment of vehicular CO\textsubscript{2} or other regional pollutant emissions has been undertaken. With regard to noise the measurements taken are insufficient to be relied upon, and noise readings were taken within school holiday periods which is far from ideal. It is unclear if noise from the M1 and Junction 15 has been accounted for, and additional information is needed to confirm impact on the development, in this respect.

6.22 NCC as Highway Authority has also commented adversely on transport issues. There is no orbital bus route serving Northampton, and walking / cycling would not be an option as it is too remote. The hotel will attract more cars, and the generally poor accessibility of the site, and provision of 450 residential units will also generate more car trips. There are no bus services within 400m walking distance, which is a normal requirement of NCC. The Transport Assessment (TA) should demonstrate sufficient services and facilities to make this a more sustainable location. NCC also has a requirement to achieve a 20% modal shift away from private car use. The applicant’s consultants have used very old traffic count data, and the scope of the TA was not first discussed with NCC. The consultants do not appear to have used accurate future traffic data in their report. Two access points to the site are considered sufficient. The Highway Authority considers that the proposals are contrary to local, regional and national transport policy and guidance.

Infrastructure provision

6.23 The following sets out the applicant’s proposed Heads of Terms for a Section 106 Agreement to secure adequate developer contributions. The scope and content of this document have been and are subject to continuing discussion (with WNDC), and may be amended by agreement, prior to completion.

6.24 The applicant has offered a commitment to the following contributions:

- A payment towards Social Infrastructure (including education and health care),
the scope of which is to be defined.

- A payment towards infrastructure required as a result of the commercial floorspace, the scope and amount of which is to be agreed.

- A payment towards community facilities, the quantum and scope of which is to be defined and agreed.

- A payment towards the provision of a Travel Plan co-ordinator.

- A payment towards the provision of off site open space, the quantum and scope of which is to be defined (which may be included within the Social Infrastructure payment).

- The timing of payments is proposed to be phased, in accordance with phasing and completion of the development.

6.25 Affordable Housing:

- It is proposed that 35% of the residential development would be ‘affordable’ (defined as housing meeting current Housing Corporation Design and Quality Standards at costs below those associated with open market housing which is accessible to people in housing need either to rent or purchase).

- The location, tenure and mix of affordable units to be agreed on a phased basis.

- Notwithstanding the above, the tenure of the first phase to achieve 70% social rented and 30% intermediate housing.

- The timing of the occupation of market units to be related to the construction of the affordable units.

6.26 Other Matters

- To construct all dwellings to Sustainable Code for Homes - Level 3.

- To construct the office element of the scheme to BREEAM Excellent standards.

- A commitment towards achieving the Hotel Bespoke BREEAM Very Good standard for the hotel element.

6.27 Despite the offer made by the applicants, it is not clear that the proposed developer contributions will be adequate to meet the infrastructure needs of the proposed development (e.g. education, transport, health facilities). This is made all the more critical by the perceived deficit in respect of these (and other) infrastructure and facilities already existing for Grange Park.

**Sustainability issues**

6.28 WNDC have set out the key sustainability targets to be met by the development based on the Code for Sustainable Homes and BREEAM. These are existing frameworks for quantifying the environmental performance of residential and non-residential buildings.

6.29 The main sustainable features of the proposed development include:

- Code Level 3 for all residential units (pre-assessment indicates that Code Level 3 compliance can be achieved with a good score indicated in all sections* of the assessment).

- BREEAM Offices rating of Very Good for the Office units (pre-assessment indicates that a Very Good rating can be achieved with a good score in all sections* of the assessment).

- Optimised energy efficient design: 25% improvement in energy-related emissions for the residential units compared to current building regulations requirements.
Achieved by energy efficient design, energy efficient supply and incorporation of renewable/low carbon energy technologies.

- Water efficient specification: low water use fittings will be specified throughout the development to minimise the use of potable quality water.
- Sustainable Urban Drainage techniques adopted across the development to minimise the risk of localised flooding with its associated environmental damage and pollution.
- Measures taken to enhance the ecological value of the site and protect significant features during development.
- Best practice Construction management techniques adopted to reduce potential negative impacts of the construction phase.
- Design to enable 10% of energy demand for the development to be met by renewable/low carbon technologies.
- Residential units designed to comply with the principles of Lifetime Homes – ensuring accessibility and future adaptability.
- Provision of recycling facilities and adequate waste storage across the development.
- Cycle storage space provided for all units.

* the score in the Materials section of the pre-assessment is low at this stage as materials choices will be made at detailed design stage. It is anticipated that the score in this section may improve, however the pre-assessment errs on the side of caution in this respect.

6.30 A Sustainability and Energy Strategy Statement has been prepared for this outline planning submission, which responds to Section 5, ‘Addressing Climate Change’, of the ‘WNDC Planning Principles 2007’ document, in particular.

6.31 WNDC has adopted the existing framework of BREEAM and the government’s Code for Sustainable Homes as the means for setting targets for, and assessing the sustainability of, new development. The key sustainability targets to be addressed are set out below:

- Residential Code for Sustainable Homes Code Level 3
- Offices BREEAM for Offices Very Good
- Hotel Bespoke BREEAM Very Good

6.32 In addition, WNDC have determined that 10% of the energy requirements of the development are to be met from renewable energy sources.

6.33 The Planning Principles 2007 document presents a summary of planning objectives listing key action areas, associated WNDC objectives and technical requirements. Compliance with BREEAM and Code for Sustainable Homes requirements is a key technical requirement for a number of these action areas/objectives.

6.34 Preliminary assessments against the BREEAM Offices and Code for Sustainable Homes criteria have been carried out by a licensed assessor, in order to confirm that the required ratings can be achieved for the development. A certified assessment cannot be carried out until the development is at detailed design and the documentary evidence required by the assessment methods is available. At such time full assessments will be carried out by a licensed assessor.

*Environmental impacts*
6.35 Various environmental issues have been identified and mitigation measures proposed through the submitted Environmental Statement, but concerns have been raised by the EHO, and others regarding adverse impacts not satisfactorily addressed, including noise and site contamination issues. The EHO notes that a main reason for this site having been allocated for non-residential development is its proximity to the M1 and A45.

6.36 The EHO notes that the results from the applicants' own noise measurements correlate well with those found from previous assessments, and which have revealed that the site is exposed to high levels of noise falling between NEC “C” and “D” designations as per PPG24. Whilst it is suggested by the applicants that mitigation measures can be applied to reduce the level of exposure, it should not be overlooked that even with the proposed acoustic barrier, the site will still fall within an NEC “C” designation.

6.37 Concerns are expressed regarding the degree of exposure for the proposed development, even with implementation of the noise mitigation measures recommended in the assessment. Since this is questionable from a sustainability perspective and particularly given that the Government will be publishing its “National Ambient Noise Strategy” this year which will seek to reduce the degree of community exposure to high levels of environmental noise issues, it is normally recommended that consideration should only be given to residential development in such locations, when there are no more-suitable alternative sites available.

6.38 This area was formerly used as part of a landfill which resulted in a degree of land contamination occurring. The EHO is generally satisfied that an appropriate assessment has been undertaken and report provided, in accordance with the relevant guidelines and standards.

6.39 The above report advises that it should be possible to remediate the situation to acceptable standards subject to implementation of a Remediation Strategy as approved by the Environment Agency and LPA respectively. More detail will need to be provided regarding the specific remediation options required for specific locations including details of how any works will be validated once completed. Such matters should be appropriately conditioned in any approval granted for this development.

**Flood risk and drainage issues**

6.40 A flood risk assessment has been undertaken as part of the EIA, but as no response from the Environment Agency has yet been received, it is not possible to comment further on the adequacy or acceptability of this.

6.41 Anglian Water have made no adverse comments regarding drainage issues, but once again, the lack of any response from the Environment Agency, does not allow for any further assessment of this issue, at this stage.

7. CONCLUSION
7.1 A mixed-use development on the site broadly along the lines proposed may be considered acceptable, in principle. The indicative design, appearance and the general layout within the site, have the potential to provide a high-quality development. However, as currently proposed, the scheme would not provide sufficient employment floorspace, to sustainably serve both the additional residential development proposed, and that already existing in Grange Park. It is also not clear that adequate additional infrastructure, to serve the new development, without in any way adversely affecting the situation for existing local residents, is allowed for and would be delivered.

7.2 Clear, safe and convenient (footpath and cycle) linkages between the proposed and surrounding development, have not been adequately demonstrated. As a result, there must be a fear that, given most of the site is surrounded by busy roads, it could become an ‘isolated island’ in Grange Park, resulting in its residents choosing to use cars even for short trips to the District Centre and surrounding area.

7.3 Members may wish to note that, should WNDC be minded to approve this application, it will have to be referred to GOEM as a ‘departure’, before any permission can be granted.

8. REASON FOR APPROVAL

8.1 N/A