

4th March 2022

Nisar Mogul
Planning Department
Economic Growth and Regeneration
West Northamptonshire Council
Daventry Area Office
Lodge Road
Daventry
Northamptonshire
NN11 4FP

Dear Mr Moqul

Application No: WND/2021/0958
Description: Creation of a truck stop
Location: Land west of Browns Road, Daventry, Northamptonshire

Daventry Town Council (DTC) submit an objection to planning application WND/2021/0958 for the creation of a truck stop on land west of Browns Road, Daventry, Northamptonshire.

This planning application was initially registered for a change of use on 27th June 2016 (ref DA/2016/0617) and was refused for significant planning reasons, summarised below:

- The visual intrusion of parked Lorries, resulting from a proposed change of use to a lorry park, is considered to be of visual detriment to this Special Landscape Area and as such conflicts with saved Policies GN2 and EN1 of the Local Plan.
- The applicant has failed to demonstrate, to the satisfaction of the local planning authority, that off-site facilities, for showers, food and drink, are adequate for the use proposed and as such conflicts with saved Policy GN2 of the Local Plan.
- The applicant has failed to demonstrate that noise created by the operational nature of the proposal can be adequately mitigated having regard to the amenities of neighbouring properties conflicting with saved Policy GN2.
- The applicant has failed to demonstrate, to the satisfaction of the local planning authority, that there is sufficient infiltration such that any concern of local flooding has been adequately addressed.

In making this decision, the Local Planning Authority had regard to the requirements of paragraphs 186 and 187 of the National Planning Policy Framework, see below:

186. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when 65 See Explanatory Note to the Noise Policy Statement for England (Department for Environment, Food & Rural Affairs, 2010). 54 determining individual applications. Planning decisions should ensure that any new development in Air Quality

Management Areas and Clean Air Zones is consistent with the local air quality action plan.

187. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

Although there have been changes to the National Planning Policy Framework, the above reasons for refusal (copy attached, appendix 1), remain valid.

As planning application WND/2021/0958 is primarily the same as DA/2016/0617 Daventry Town Council reiterates its objections dated 29th July 2016 (copy attached, appendix 2)

Daventry Town Council further submits objections to this application on the following grounds:

West Northamptonshire Strategic Plan: On 11th October 2021, West Northamptonshire launched a spatial options consultation on the strategic plan for West Northamptonshire - [West Northamptonshire Strategic Plan Spatial Options Consultation - West Northamptonshire Joint Planning Unit \(inconsult.uk\)](#). Within this document, Spatial Option 2b, North and West of Daventry references the potential for employment in this area. The rationale for this not being considered for development is clear:

Regarding heritage, there is a potential impact on the setting of All Saints Church in Braunston.

A further constraint is the topography of the area – the land falls away from the town where there is a relatively well-defined edge and this is likely to increase the visual impact of the site on the local landscape and the views from Braunston and also long distance views to the west where Kentle Wood, a local green space, currently defines the western edge of Daventry and provides a strong landscape feature because it is on the top of a slope.

Furthermore, development of this area could reduce the gap and result in coalescence with an area situated to the north and west of Daventry which lies to the north of Drayton Fields industrial estate and to the west of Royal Oak industrial estate, this option would be accessed via the A361 and the A45. The area is promoted for employment by multiple landowners with a potential capacity of approximately 90 hectares. Braunston (part of site identified as green wedge in Daventry Settlements and Countryside Local Plan). The topography could have impact on format of buildings in this option which could further increase the landscape impact.

A local wildlife site is situated to the south (not within site boundary) and the southern corner of the area forms part of the special landscape area.

There is a public right of way running through the western part of the option which also includes the Jurassic Way long distance footpath, its enjoyment would likely be affected by the development of this site.

Daventry

Town Council's response to the consultation on this point emphasises that this area of the Town is not suitable for any further commercial development:

The proposed extension of the existing industrial sites to the north and west of Daventry would challenge the Settlements and Countryside Local Plan – Part 2, in relation to the green wedge area adjacent to land already identified (EC7) for development. The linear strip of woodland, known as Kentle Wood, managed by the Woodland Trust and used extensively by residents would be consumed by the proposed commercial development, when this area should be identified as an area to expand the green infrastructure, planting more trees to encourage wildlife and help to address the issue of climate change. This proposed area also adjoins the Braunston Covert an identified local wildlife site, which currently sits in open countryside. The landscape in this area is an important visual asset traversed by the Jurassic way, an ancient ridgeway traversing Britain. It's a popular walk for ramblers, leaving from Charwelton to Braunston, a distance of approximately 9 miles (14.48 km). it is important to preserve the visual heritage of this area and protect the countryside from encroachment of any type of development.

Route is not free-flowing hindering access for Emergency vehicles to the Sports sites, recycling centre and Kentle Wood

Daventry Town Council would like to further highlight that within the Town Design Statement this area is clearly identified as a 'Special Landscape Area' and no notification has been received to advise that this classification has been changed.



Map of Daventry's designated areas of conservation/historic interest (reproduced by kind permission of Daventry District Council 2006) in the Town Design Statement.

Daventry Town Council would also like to bring attention to West Northamptonshire's policy on green infrastructure:

Policy 29 on supporting and enhancing biodiversity requires all major developments to secure a net gain in biodiversity through the strengthening management and/ or creation of new habitats. It requires proposals to include measures to enhance biodiversity within or around the development site and contribute to the consolidation and development of local ecological networks. Which is proposed to be split in two, 29a being: on supporting and enhancing biodiversity will focus primarily on the same principles as the existing Policy 29 and 29b being: on nature conservation provides additional policy direction on matters including ecological assessments and those affecting existing designated sites including the Special Protection Area and Local Nature Reserves

Further

consideration needs to be given in relation to air pollution and environmental pollution. The increase in commercial traffic will negatively impact on air quality for the immediate sports area, and the new development of 1200 houses being built within 500 metres of this development proposal. The proposed location and has not considered or been designed to respect the narrow no-through road (with off-road parking), sports park, bowls centre and the Daventry Town Football Club. To create a facility for circa 135 vehicles, in this location will increase pollution and create environmental health issues.

Flooding, whilst flooding may not appear to present a problem, water run off is an environmental concern. Commercial vehicles will create diesel residue and when it rains this will drain onto adjoining land that will drain into the Severn Trent Leam area (not Anglian Water as stated in the report by ADC Infrastructure) and eventually into the River Leam

Light pollution is another area to be considered, in order to make this area safe, for both the driver's of the vehicles and people accessing the sporting facilities, the lighting would need to ensure community safety. The Town Council requests that if this application is to be taken any further it is referred to Northamptonshire Police Crime Prevention Design Adviser, to ensure this area is a safe place for users of the lorry park and users of the adjacent sports facilities.

Daventry Town Council has witnessed many poor planning decisions in the town, especially where commercial areas have been built too close to residential areas. As a statutory consultee, the Town Council has the responsibility to raise awareness of the local issues that a planning application may bring to an area. In relation to this application the Town Council is vehemently asking that its observations and comments are taken into serious consideration, as this proposal is not appropriate for this location in the Town.



Daventry Town Council strongly objects to this planning application and respectfully asks that members of West Northamptonshire Planning Authority review and question the facts in the reports submitted by the applicant, as they are not, in the Town Council's opinion a true reflection of the site, its suitability and environment.

Yours sincerely

Deborah Jewell
Chief Officer on behalf of Daventry Town Council

Enc - Comments received from residents providing local knowledge that supports an objection to this planning application.

Objection from Daventry Town Football Club

Firstly, although the report produced by Golby Luck in supporting the application states

.3 The proposal will not require the construction of any new structures or buildings. The truck stop will make use of the existing facilities at the adjoining football club.

No-one from Golby Luck has spoken with anyone from Daventry Town Football Club and when I phoned them to see where this information had come from, I was told someone would contact me to which no call was received .

Moving on to the planning statement and point 5.20 below:

Transport 5.20 The submitted Transport Statement prepared by ADC Infrastructure Ltd confirms that a safe and suitable access can be achieved from Browns Road. Browns Road is wide enough for a car and max legal articulated lorry to pass one another, and for a max legal articulated lorry to pass another max legal articulated lorry in the opposite direction.

I am sure Councillors are aware of the problems already on Browns Road with the recycling centre and the queuing of traffic most days. In fact, vehicles are also parked on the kerbside nearest to the other businesses.

On Browns Road, today I went up and measured the width of the road from the parked vehicles to the kerb 5.4 metres, with my van parked in the queue to the recycling centre the distance between my van and the parked cars was reduced to 3.4 . Now I would say the overall width of the lorry including mirrors 3.0 metres, so it is impossible for 2 lorries to pass each other as stated in the Transport Statement prepared by ADC Infrastructure Ltd.

We also have at the end of Browns Road access to Kettle Wood and numerous dog walkers will park their vehicles adjacent to the recycling centre again reducing the road width and the ability of large lorries to manoeuvre this is already a problem with recycling trucks trying to enter the centre.

The football club itself generates extra traffic when the clubhouse is being used for weddings, parties and wakes not to mention matchdays, people put their hazard lights on and overtake the queuing traffic for the recycling centre not ideal and if as I expect 40ft lorries would start doing this if the permission was granted, I dare say we could become blocked off and prevent emergency vehicles reaching the football club.

We object to the application

Co Chairman

Daventry Town FC

DTFC Clubhouse 01327 311239

Browns Road, Daventry NN11 4NS

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From :
Property Owner, neighbouring the land of the proposed Lorry Stop

Subject: Objections to Browns Road Lorry Stop

We strongly object to the proposed Lorry Stop:-

We daily use Browns Road and track beyond as our access. The running of HGV's would cause us massive disruption, the track being only single file at the lorry stop entrance/exit. No 2 vehicles could pass one another.

Contamination from surface site run off.

Our farm and the proposed site are within Severn Trent Leam Priority Catchment Area.

The applicants suggest surface water run off to the northwest over our land. This would naturally gravitate to a watercourse to the west of our land and then on into the River Leam.

Air, light and noise pollution from the site day and night.

Browns Road is already busy and at times blocked up with vehicles accessing the Recycle Centre, The Sports Park, The Car Wash, Bowls Club and Football Club and cars parking to enjoy walks Kentle Wood. We believe the private recycling centre is also due to open with lorries regularly accessing and egressing, adding to an already busy traffic route within a no through road.

There is also concern over the busy footpath which runs up Browns Rd and track to Kentle Wood which will undoubtedly get busier with the new nearby housing developments.

From : Property neighbouring the land of proposed lorry stop.

OBJECTIONS

1. The property adjacent to this site is listed as a farm, this is not correct, its residential, and comprises of ELDERSTUBBS FARMHOUSE, THE COTTAGE, THE ANNEXE all of which are in my ownership.
2. All of the above will be greatly affected by light distribution/pollution due to vehicle movements throughout the evening periods, plus the extensive use of floodlighting in this area.
3. The same properties will be greatly affected by noise pollution throughout the daytime and evenings.
4. Reference timings listed this will be 24 hours a day!
- 5 Some residents work for the NHS with various shift patterns, which will cause problems with their sleeping requirements.
6. It is also stated that DRIVERS will have access to the Football Club facilities. The Football Club have told me that no-one has contacted them about this application. Where will the drivers go to for facilities??? There are no other facilities listed on this application!

7. How will existing businesses cope with an extra 135!!!! articulated lorries/ trailers using an already over congested BROWNS ROAD, with vehicles already queuing onto the roundabout at the main junction of said road when the council tip is open to the public, and a new housing estate about to be started opposite as well !!.plus the public parking on this road to go walking on the public footpaths along access road, already accidents this last weekend on this roundabout.

8. Reference illustrations listed by GOLBY & LUCK. No-one has approached me for a site visit to ELDERSTUBBS FARMHOUSE properties, which they list as a farm, which is incorrect as laid out in number 1. Why take photos from ASHTREE FARM driveway as it is miles away from the site application and will have NO impact upon them?

9. If the existing plant / BIOMAS unit starts working again, which is imminent, this will increase HGV movements further adding to an already major problem on Browns Road.

10. How will two 40ft articulated lorries manage to pass each other, with vehicles already parked on this two-lane road anyway?

11. Another property owner, whose land adjoins this application has not been contacted either?

12. Should this planning application be granted, to which I strongly object, I would ask for much more screening to alleviate all my concerns listed above to ELDERSTUBBS FARMHOUSE, THE COTTAGE (which forms part of the boundary), THE ANNEXE all of which are residential properties.