

# Tiffield Parish Council

Response from Tiffield Parish Council to Application No.: S/2020/1644/EIA

Town and Country Planning (EIA) Regulations 2011. Standard Consultation.

**Proposal:** Hybrid planning application comprising: Outline application with all matters reserved for an employment park comprising B1a, B1b, B1c, B2 and/or B8 uses, including ancillary offices (B1a), Sui Generis (selling and/or displaying motor vehicles, showrooms and petrol filling station), and/or A1 and A3 uses, *service yards and HGV parking, plant, vehicular and cycle parking, earthworks and landscaping*. Full planning application for a new roundabout access from the A43, internal spine road, substation, *lighting infrastructure, engineering operations including foul pumping station, earthworks (including creation of development plot plateaus), pedestrian and cycle infrastructure and strategic landscaping including drainage infrastructure. (Application accompanied by an Environmental Statement)*

**Location:** Land to the east of Tiffield Road and to the north west of the A43, Towcester

**Original Scoping Proposal:** Scoping Opinion for the proposed development comprising of an employment park comprising B1a, B1b, B1c, B2 and/or B8 uses, including ancillary offices (B1a), Sui Generis (selling and/or displaying motor vehicles, showrooms and petrol filling station), and/or A1 and A3 uses, and/or C1 use (hotel). Full planning application for a new roundabout access from the A43, internal spine road and substation.

FAO: A. Longbottom, Case Officer and J. Newton - Assistant Director - Planning and Economy

## Introduction

Our Parish Council have met with the developers and their representatives on numerous occasions and on one occasion with over thirty concerned Tiffield residents also present. IM Properties have called these meetings 'consultations.' We cannot see how they can reasonably be called this when we have instead been given a series of *presentations* in which the developers have outlined their plans (such as they are) with the air of them being a *fait accompli* and into which we have had no chance of an input.

None of the concerns raised at any of these meetings have yet to be addressed to our satisfaction by the developers.

We note that the information italicised in the above application is additional to that in the original scoping proposal. We also note the continued use of the term '*Sui Generis*' above - a term given to the uses of land or buildings not falling into any of the use classes identified by the Use Classes Order, which keeps what could be built on the site almost completely open-ended.

We further note that after '*A3 uses*' above, the term '*and/or C1 use (hotel)*' is now not included in the application. We welcome this. The developers assured us that there would be little or no visual impact to Tiffield from the commercial units and warehousing, but we were concerned that a hotel may have a significant visual impact depending upon its design.

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The following preamble is included for residents of Tiffield and others reading this not familiar with local planning. This is followed by some areas of concern which we would like clarification on. These, in turn, are followed by grounds for objection to the application.

## **Preamble. The South Northamptonshire Part 2 Local Plan (SNLP) and the West Northamptonshire Joint Core Strategy Local Plan Part 1 (WNJCS).**

In the introduction to the South Northamptonshire Part 2 Local Plan (SNLP), of which this proposed development forms a part, reference is rightly made to the SNLP building on the West Northamptonshire Joint Core Strategy Local Plan Part 1 (WNJCS).

The WNJCS provides the overall framework for development in the area and to which the SNLP must pay due regard. This is stated by SNC in the SNLP in para 1.1.14: *'This Plan is intended to sit alongside the WNJCS. It should, therefore, be read alongside the policies within the WNJCS.'* We will return to this later.

In the SNLP para 1.13, it is said that *'Once adopted, this plan will replace the remaining 'saved' policies of the 1997 South Northamptonshire Local Plan and WNJCS Policy H6: Gypsy, Traveller and Travelling Show People and Policy H2: Affordable Housing.'* No mention is made of other policies in the WNJCS being replaced, so SNC and any developers must pay regard to the remaining policies in the WNJCS.

This is stated in para 1.1.7 of the SNLP; *'This plan has been prepared to guide development across the district. In developing the Part 2 Plan, it is important that the policies are in conformity with the WNJCS and do not undermine the spatial strategy, which seeks to focus development at the most sustainable locations e.g. Northampton, followed by Daventry, Brackley and Towcester and then the more sustainable villages.'*

We will return to the issue of sustainability later.

## **Concern. Conjoined developments and link to the A5 from Tiffield Lane.**

As Councillor Ian McCord said in his introduction to the SNLP: *'As a council we recognise that a strong economy is at the heart of our quality of life and the policies in the plan seek to retain the employment land we have as well as to increase the supply of new employment sites. We aim to meet the demand for small and medium sized units by suitable land allocation.'*

We want SNC to tell us the definition of 'small', 'medium' and, also, 'large' in this context.

We also want SNC to tell us if it is correct to suppose that splitting the conjoined Bell Plantation and Tiffield Lane developments is simply a strategy to make them fit into the above statement. This is particularly germane as a link road connecting the two sites is shown in the plans IM Properties have for Tiffield Lane.

There is no mention in the application of this link road being built. No information has been given to us, nor have any traffic studies been done on how this link road may affect traffic flows to and from the Tiffield Lane site or through Tiffield.

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If built, this road would offer an alternative access to and from the A5 to the A43, either through the Tiffield Lane site or through Tiffield to the A43 via the dangerous St Johns turn.

If the developers of the A5 site and IM Properties are colluding to make this link road become a reality, we expect the planning authorities to reject and prevent this possible link road now and in the future.

## **Concern. Consultation on the SNLP**

We note that concerns have been raised, and reported in the Northampton Chronicle on 27<sup>th</sup> July 2020, over whether or not due process had been followed by SNC in the preparation of the SNLP, regarding the consultation held with neighbours in relation to the proposed developments at Bell Plantation (AL1), Woolgrowers Field (AL2), and Tiffield Lane (AL3).

We want to hear how these concerns have been or are being addressed by SNC and how this will affect this application.

## **Concern. The Tiffield Lane / A43 crossover closure.**

We note that the proposed application would involve the closure of the crossing over the A43 at the end of Tiffield Lane and the building of a signalised roundabout at the present Hulcote / Northampton Road turn.

The closure of the A43 / Tiffield Lane crossing for traffic going from Tiffield towards Towcester would be an inconvenience to residents of Tiffield. As detailed later, this will particularly concern cyclists and pedestrians, as it would necessitate a very long, detour to the new roundabout to safely cross the A43 and then a long journey along the old Northampton Road to Towcester and vice versa. However, this closure would improve the safety of residents using cars, so we do not entirely object to this closure proposal.

## **Objections**

### **The clarity of the application**

To reiterate, we wish to know how the process which IM Properties and SNC have in the past called a 'consultation', can be properly called this, when neither IM Properties, nor SNC planning and certainly not the residents of Tiffield, have any idea what buildings or businesses the proposed development will entail and what the consequent traffic and environmental implications may be..

We continue to be extremely disappointed by the continued lack of clarity about what is proposed to be built on the site. As previously said, it is unclear to us how we are expected to comment properly on this application without a clear idea of:

- What is to be built on the site (building type, size, position, use etc etc)
- How many people will be employed there
- How many people are expected to visit the site and in what vehicles

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As a result we and crucially, *the developers*, can only guess at the resulting light and noise pollution from the site, the visual impact which will be experienced by residents of Tiffield and, particularly, the effects this proposal will have on traffic flows through Tiffield and the surrounding area.

This lack of clarity alone in the application, we believe, gives grounds for objection.

## **The new Hulcote turn roundabout and Northampton Road ‘rat-run’**

We are concerned that the creation of the new roundabout will mean that vehicles from Tiffield will use the old Northampton Road to go from and to Towcester and the A5 south, further increasing the already bad congestion and air pollution experienced at the Saracens Head A5 / Northampton Road junction traffic lights.

We are also very concerned that traffic volumes along the old Northampton Road will also increase as drivers realise that the route to and from the A5 / Northampton Road junction to the new roundabout will provide a convenient ‘rat-run’ to avoid the already badly congested A5 / 43 roundabout. We note that the developers have proposed some mitigating measures to the residents of The Shires in anticipation of this very problem. We await The Shires residents’ response to these measures which we think are unsatisfactory and insufficient to address these problems.

This application will markedly increase the amount of traffic using Northampton Road to go to and from Towcester, further increasing the already bad congestion and air pollution experienced at the A5 / Northampton Road junction traffic

We therefore object to this application on the grounds above.

## **Tiffield Lane crossover closure. Poor cyclist and pedestrian provision. Green infrastructure opportunity.**

Cycling and walking are the most sustainable means of transport. We therefore urge the planning authorities to make the developers provide a safe crossing for pedestrians and cyclists near the closed crossover at the end of Tiffield Lane.

The developers propose instead that pedestrians and cyclists going to Towcester from Tiffield or the site take a long detour along the lengthy new access road to the new roundabout and then all along Northampton Road to Towcester. The developers suggest pedestrian controlled lights at the new roundabout. Even if this detour is discounted and, as is presumably intended, many employees at the site and travellers to and from Tiffield sustainably walk or cycle, then this would cause congestion at the new roundabout and possible accidents.

A footpath / bridleway (SB 52) already exists at the end of Tiffield Lane from the A43 over the old railway bridge onto Old Tiffield Road in Towcester. A footbridge suitable for pedestrians and cyclists at the end of Tiffield Lane would be far safer than pedestrian controlled lights and much more convenient than the proposed route. It would therefore

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encourage much greater use of sustainable transport to access the proposed development to and from Towcester, making the development more environmentally sustainable.

Money saved by not having to improve pathways along Northampton Road and installing pedestrian-controlled lights at the new roundabout could be put towards this footbridge. A safe crossing here would also offer a unique opportunity for the crossing to become a part of the Green Infrastructure Network, enabling a green corridor pathway connecting Towcester to Northampton, along the route of the disused railway line to Blisworth Marina and thence by the Northampton Arm of the Grand Union Canal, to Northampton town centre and beyond.

This initiative would be in line with WNJCS Policy S10 (j) which says that new developments should *'Promote the creation of green infrastructure networks...'*

It also accords with SNLP Policy NE3: Green Infrastructure Corridors part 2 which states that: *'Development proposals which accord with the development plan will be permitted where they contribute to the delivery of green infrastructure that meets the needs of communities both within and beyond the boundaries of the district, including the establishment of new infrastructure and improvements to the quality, use and provision of existing infrastructure.'*

Furthermore, the developers own Transport Assessment, Appendix A (pdf file p. 375), dealing with the Towcester North A43 / Northampton Road, notes on page 8, para 3.1.6 that: *'There is an existing uncontrolled bridleway crossing point across the A43 immediately to the south-west of the Tiffield Lane central reserve gap. This bridleway links Old Tiffield Lane on the south of the A43 with Tiffield Lane to the north and may present a desirable route for pedestrians and cyclists travelling between the development and the residential area on the southern side of the A43.'*

Unfortunately, the developers told us that they have dismissed the idea of making a safer crossing here on grounds of cost and land ownership.

We urge the developers to reconsider this and for the planners to press the developers under Policy NE3 above for a safe and more convenient crossing at the end of Tiffield Lane as a prerequisite for this application succeeding. We also urge the planners to urgently investigate the possibility of purchasing the land required to make this safe crossing a reality. This development provides a unique opportunity to enhance the green infrastructure network.

Without this safe crossing we object to the application on the grounds that the application as it stands, would provide poor, therefore less used and thus less sustainable access to the site and Tiffield to and from Towcester

## **Employee residence, commuting and regional transport issues.**

The developers say in their own Environmental Impact Assessment (EIA), para 16.6, p.76: *'it is expected that a large proportion of the jobs created will be taken-up by existing residents at the local and regional level, helping to reduce out-commuting.'* But they also go on to say in their EIA, para 3.46 p.19, that we are in an area of already high employment.

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What evidence is there for the first of these statements? And are the developers therefore expecting that local people will give up existing jobs to work in this proposed development?

The developers also say in their EIA para 16.6, p.77 that: *'of those who will be employed at the Site and residing outside of the district, the vast majority of workers are anticipated to be residents from neighbouring local authorities. Census 2011 origin destination data indicates that 85% of people working in the site's lower super output area live within either South Northamptonshire, Northampton or Daventry. It is therefore unlikely that many workers will relocate to live within South Northamptonshire'*.

This is an admission that most employees will commute to the site. In addition, these employees will take the economic benefit of their work back to neighbouring local authorities.

We want to know the evidence base for the statement above and want to know how *'local'*, *'regional'* and *'neighbouring'* in the above statements are defined.

The Tiffield Lane development will not reduce out-commuting. Even if all the new workers employed at the site were to live in the new housing developments in Towcester, the vast majority will drive to the proposed site, therefore will out-commute or, more simply, commute from Towcester to the Tiffield Lane development (and, indeed, the other proposed sites). This would particularly be true as there is an absence of public transport and of convenient short walking or cycling routes for access in the plans for the proposed Tiffield Lane development.

We also want to know what the effect will be of putting another signalised roundabout on the A43 on journey times on what is a main strategic arterial route. How can an additional roundabout be seen in this context as an *'improvement'* to the A43? We would like to know what the latest assessments are which Highways England has made of this, especially in the light of possible further remodelling of junctions along the strategic route between the M1 and the M40.

We further note in para. 2.2.13 of Transportation Strategy that Highways England agree that the new roundabout *'might prejudice the implementation of a future Expressway Scheme on the A43'*. Does this mean that long-term strategic benefit is being sacrificed for short-term gain? Also, NCC Highways' response to the draft Local Plan (in a letter dated 14.7.16 at Appendix C) makes no reference at all to the proposed new roundabout. We feel that these significant issues have been underplayed by the applicants.

The A43 at Tiffield Lane forms a clear boundary between Towcester town and the countryside. This application involves a major disruption to the free flow of traffic on the A43 and extends the town's built-up boundary into a greenfield site beyond what is meant to a bypass.

As the WNJCS states in para 6.11 *'The transport evidence base shows that there are significant parts of the road network, especially around the four towns of Northampton, Daventry, Towcester and Brackley which cannot cope with the expected number of trips as a*

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*result of traffic growth from the existing residents, or new development, if travel behaviour does not alter.'*

The expected local and regional commuters mentioned above will compound this problem and put further strain on an already congested local and strategic road network.

This development proposed in this application (especially taken together with those at Woolgrowers Field and Bell Plantation) will only serve to **increase** the amount of commuting by car, exacerbate the problem described in 6.11 and further strengthen the cycle of car dependency referred to by the WNJCS para 6.7.

The M1, A43, A5 and other major arterial routes will see a significant increase in the number of heavy good vehicles because of the new developments around the M1 corridor. What work has been done to predict the likely impact of the proposed Tiffield Lane and other local developments together with the M1 developments on the already overstrained and congested local and strategic road network?

As far as we are aware, little or no work has been done on the likely effect that this *combination* of developments will have on rural communities such as Tiffield which rely on local roads to access daily services.

We therefore object to this application on the grounds that it will, with other developments:

- Increase the amount of commuting and, as we also argue later, is therefore unsustainable
- Strengthen the cycle of car dependency
- Have a deleterious impact (especially taken together with other local developments) on the local transport infrastructure
- Increase congestion, and therefore pollution and journey times, on what is a main strategic arterial route by putting another signalised roundabout on the A43.
- Blur the boundary between Towcester and the surrounding countryside

## **Employment need and uses for the site.**

As previously said, the developers say that this development will be situated in an area of already high employment. Given this, we wish to know what exercise has been undertaken either by the developers or by SNC to show the need for another 1,000 – 1,500 jobs in the Towcester area and also how this tallies with the following telling statement in the SNLP para 13.2.1:

*'Although there is **no specific identified need for additional employment to meet the needs of the town** (based on the housing and employment requirements set out in the WNJCS) it is considered to be important to facilitate some additional **small scale** employment opportunities to provide additional choice and opportunity for the growing population and to look to reduce out-commuting.'*

Again, 'small-scale' is not defined. What does this mean?

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We also question if there is a need for this proposed development, given the very large number and scale of similar developments locally for example at Swan Valley along the A4500 and the local M1 junctions. There are some 65 business parks already in the area such as the 1 million plus square foot Panattoni Park and there are also the planned Grange Park and other development sites close to the junctions 15 and 16 of the M1 to consider. These developments dwarf the proposed development on Tiffield Lane and are in a much more advanced state of progress than is this application.

How, given this background, is the extra development on Tiffield Lane justified? What proven demand is there for any of the facilities proposed for this site?

**Office use.** As to any proposed use of the Tiffield Lane site for office use, the WNJCS para 5.68 states that *'There is sufficient land already identified for office development to last the whole plan period of this JCS to 2029; this is primarily focused on the regeneration of Northampton's Central Area and for qualitative reasons additional office development in Daventry central area. Towcester and Brackley will need to maintain, renew and replace their stock of office development. On a quantitative basis no new office development sites are required to be allocated at a strategic level through the JCS.'*

When written, this statement took no account of the increasing trend for office workers to work from home, accentuated markedly (and perhaps permanently) by the coronavirus pandemic. Therefore, additional office space at this site is very unlikely to be required.

**Warehousing.** The WNJCS, para 5.70, states: *'The area remains attractive to the warehouse industry and indications are that it is likely to remain so for the lifetime of the Plan. However, delivering new space to cater for the warehousing sector on a trend-based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy.'*

It then goes on to say in para 5.71: *'West Northamptonshire already has a large supply of warehouse development with planning consent in the pipeline including Swan Valley, Bedford Road (Former Cattle Market), and DIRFT. The majority of any new warehousing will be accommodated on existing employment sites through the employment land supply pipeline and churn of employment land. The allocation of a strategic employment site at Northampton M1 Junction 16 provides further support for demand in this sector in a sustainable manner consistent with the economic strategy within the Plan as a whole. New large warehousing developments (in excess of 40,000 sqm) will normally be expected to be provided for at DIRFT.'*

Since this was written, several more warehousing sites in the local area have come on stream.

The SNLP Policy AL3 states under '3. Land uses: employment' that the site will have 'a. An independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.'

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We contend that the application:

- Does not justify the need for extra employment in the area
- Takes no account of existing and planned local warehousing or office capacity
- Does not conform to either the spirit or the letter of paragraph 5.70 of the WNJCS either in desirability or sustainability
- Takes no account of the changing economic landscape brought on by the coronavirus epidemic and resultant economic climate
- Serves no identifiable building need. (Particularly at this location on the edge of an urban area, with the concomitant problems of ‘piecemeal development’ described in the WNJCS para 5.10 and detailed below)
- Has no evidence that we are aware of that the proposed land use has been independently assessed or market evidenced.

We therefore object to this application on the grounds listed above.

## **‘Piecemeal’ development and sustainability**

The continued lack of clarity about what is proposed to be built on the site has already been discussed and, to us are sufficient grounds alone for objection. What follows gives grounds for objection on the scale of the site (especially if taken together with the conjoined Bell Plantation site) and of the uncertainty surrounding its use.

The Tiffield Lane development is part of the 60.5 Ha of employment land in Towcester proposed in the Local Plan. The SNLP, para 13.2.1, as quoted earlier, says there is no specific identified need for additional employment to meet the needs of Towcester.

We therefore see no evidence to justify such a large allocation of employment land as that proposed for the Tiffield Lane development (and others) and therefore see no evidence of need for an application of this size and so object to the application on this basis.

The WNJCS para 5.10 states that: *‘Piecemeal development spread around the edges of the urban areas would increase the load to the current road and utilities infrastructure, without bringing forward the economies of scale that would make the provision of further infrastructure cost effective and therefore deliverable. Such incremental development is more difficult to serve with the range of community facilities needed to support the increase in population. Consequently, the Spatial Strategy is one of concentrating additional development within the existing towns as far as possible and in a small number of large development areas, called sustainable urban extensions.’*

Furthermore, Policy S8 part (c) in the WNJCS explicitly states that in the distribution of jobs *‘Local employment provision (should be) within sustainable urban extensions as set out in the sustainable urban extension policies;’*

This development is not within a sustainable urban extension and existing land opportunities, dating from 1997, remain to be fully realised. There is also a current commitment of 15 Ha for employment use in the sustainable urban extension south-west of Towcester.

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To summarise here, the Tiffield Lane application (and other proposed developments on the A5 and A43) are therefore:

- ‘Piecemeal’ development spread around the edges of the urban areas, with the concomitant problems described above in the WNJCS
- Are not in a sustainable urban area (SUE)

As described earlier, the purpose and need for this site is problematic at best. As it also represents ‘piecemeal’ development and is not in a SUE, we object to this application on the grounds listed above.

## **Traffic flows in Tiffield.**

Many of our biggest concerns about the Tiffield Lane development revolve around increased traffic flows through Tiffield, particularly past our village school and the Gateway School at St John’s.

We were told by the developers that the development could attract 1,000 to 1,500 jobs on site, depending on what is built there. The overwhelming majority of these employees and other visitors to the site as argued earlier will arrive by car, especially if there is no safe crossing at the A43 Tiffield turn. There will also be further vehicle movements for deliveries, collections etc. The development will attract employees and visitors from all over the local area, an unspecified number of whom will drive through Tiffield to access the site. This can only increase traffic flow through the village. Delivery and collection firms could also use the roads through Tiffield to access the development, further increasing traffic flow.

This alone is cause for concern, but also worrying to us is increased traffic flows through Tiffield due to congestion at the new signalised roundabout. As you will be aware, the existing A5 / A43 roundabout experiences major congestion issues at peak and, indeed, other times. We believe that the new Hulcote signalised roundabout will experience the same issues, especially when there are problems on the M1 and traffic diverts off the M1 to travel North or South along the A43 and A5 to re-join the M1..

To avoid congestion at the new roundabout there will be a strong temptation for drivers heading North along the A43 towards the M1 to avoid this congestion by turning left into Tiffield Lane, then proceeding through the development into Tiffield, travelling along High Street South which is in a conservation area (and part of which is less than 9’6” wide with priority signage), past the school and then along St Johns Road to re-join the A43 at the St Johns school turn.

Even more likely is that workers and delivery drivers heading South along the A43 towards Towcester who wish to access the new development will attempt to avoid congestion at the new roundabout by diverting across the A43 at the already dangerous St Johns crossing and following the reverse of the route described above.

We also fear that employees, delivery drivers and visitors to the site heading South down the A5 will also try to avoid congestion at the existing A5 / A43 roundabout by using the inadequate single-track road through Caldecote and then access the proposed development

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through Tiffield. Employees, delivery drivers and visitors to the site could also use the reverse of this route to access the A5.

There is also a danger of creating further 'rat-runs' as more drivers of through traffic will leave the A43 at the St John's turn to access the A5 via Tiffield and Caldecote (and vice-versa).

A new link road to the A5 from the proposed development will only serve to exacerbate these problems.

We see little, if any, proper account of these potential problems being addressed by the traffic surveys done on behalf of the developers. These surveys cannot satisfactorily predict future traffic movements through Tiffield and surrounding areas, especially in unforeseen circumstances such as road closures on the M1 etc.

Tiffield already experiences dramatically increased traffic flows when there are problems in the local road network. The traffic surveys take no account of this and no account whatsoever of what would happen if a link road was built to the A5.

Indeed, in a traffic survey commissioned by the applicants themselves (Transport Assessment and Transportation Strategy, para. 6.5.3) even the applicants admit that there will be an additional vehicle passing through Tiffield every 2 minutes. We are sure, especially given the scenarios set out above, that this figure drastically underestimates the degree of future 'rat-running' that will take place through Tiffield. This additional traffic cannot represent what the developers call in para 6.5.3, an '*indiscernable*' impact in and around Tiffield and adjacent villages.

To summarise here:

- This application will markedly increase traffic flows through Tiffield
- Thus, present unacceptable additional hazards to local adults and children, especially in the environs of the schools
- Increase noise and air pollution, affecting the quiet, rural nature of Tiffield village and its roads

We therefore object to this application on the grounds listed above.

## **Sustainability**

As stated in para 1.1.23 of the SNLP: '*It is a legal requirement to prepare a Sustainability Appraisal (SA), which informs the approach of the Local Plan.*'

The Bell Plantation (AL1) and Woolgrowers Field (AL2) are mentioned in this but there is no mention at all of the Tiffield Lane development in the SA. Why is this? We feel that this omission may call this development into question and gives another ground for objection to the application.

We would also really like to know how, in this present climate (pun intended), this development is in **any** way sustainable.

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It replaces a visually pleasing agricultural greenfield site at an entrance to our village with buildings of unknown visual impact which, according to the developers in their letter to the residents of the Shires, will need additional screening.

The development will also increase greenhouse gas emissions in the manufacture of materials for its construction, in its construction phase, in its operation and from the additional delivery traffic and commuting to and from the site. It is certain that this site will generate more journeys by car from the local area and so further strengthen the cycle of car dependency. Increased traffic will also mean more diesel particulates, carbon dioxide and nitrous oxides (both greenhouse gases) and other noxious gases will be produced. These are already a severe and life-threatening problem, particularly along Watling Street in Towcester. This development, and others like it will only serve to exacerbate this problem.

Policy C2 in the WNJCS states that *'New development in the four towns of Northampton, Daventry, Towcester and Brackley and primary service villages will be expected to achieve the modal shift targets (in paragraph 6.13) by maximising travel choice from non-car modes'*.

We do not see this proposed application addressing this policy in **any** way, especially as the developers appear to rule out a safe crossing for the most convenient sustainable means of transport at the Tiffield Lane turn.

The WNJCS para 6.13 states that: *'This Plan is based on the Modal Shift Targets initially set out in Northamptonshire County Council's Transport Strategy for Growth... These are: a 5% Modal Shift away from Private Car Trips across existing developments and a 20% shift away from Private Car Trips from all new development. Our analysis shows that it may be possible to achieve more. These targets are, therefore, viewed as minima in this Plan, and all travel interventions should be designed to achieve the highest modal shift possible, with some new developments, particularly the Sustainable Urban Extensions, aspiring to achieve a modal split of no more than 40% of trips being made by car.'*

The applicants' own Framework Travel Plan para 3.4.1 states *'The Travel Plan aims to facilitate a greater modal shift to non-car modes amongst staff. At this stage the recruitment process has not yet began (sic), and therefore it is difficult to set targets for the site.'* It goes on to quote 2011 traffic census data which shows that 70.5% of people who work in South Northants journey to work in single occupancy cars and 11.7% do so by car share. In para 3.4.2 the Travel Plan says *'A 10% reduction in single occupancy car driver trips has been set and this is to be achieved over the 10-year period of the Travel Plan following full occupation of the development site.'*

This is a long-term and very limited target which is 10% below that stated by the WNJCS. Even if this was to be met there would still be increased traffic as a result if this application were approved.

To summarise here, the Tiffield Lane application (and, by implication, the other proposed developments on the A5 and A43) is therefore unsustainable as it (and they):

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- Will adversely affect the visual aspect of the area
- Will increase greenhouse gas production in manufacture, construction and operation despite mitigation measures proposed by the developers
- Will increase greenhouse gas, noxious gas and particulate production from traffic to and from the site and further exacerbate these problems on our local road network, particularly through our village and in Towcester
- Does not offer a sufficiently large Modal Shift away from car use, especially if this development were to attract employees from a wide area
- Will increase the cycle of car dependency

We therefore object to this application on the grounds listed above.

## **Climate change**

We also want to know how this development can be reconciled with SNC declaring a climate emergency in June 2019 and declaring that it would investigate action that could help limit climate change?

Despite all the measures which the developers say that they will take to limit the environmental impact of the development in their Sustainability Statement, the bald fact remains that if it is built, this site will not be carbon neutral or negative. This site will instead help contribute to climate change, not prevent it.

The deleterious effect this one site will have on the present climate emergency may be small, relative to the total regional, national, and global effects of further development. However, continuing to grant permissions for this and similar sites will only serve to incrementally increase the future effect of climate change.

We argue that this is too high a price to pay, particularly when the very need for this and similar sites is in question and our other grounds for objection are considered.

We therefore object to this application on the grounds of need and that it will contribute to climate change, contrary to SNCs own aims.

## **Summary**

- The application is so lacking in detail from the developers about what may be built on site that any predictions of employment numbers, traffic flows etc. and therefore the effects on Tiffield, are almost impossible to predict
- There is no proven need for this development being sited on Tiffield Lane either in terms of providing jobs or infrastructure, particularly when there are other unrealised existing local employment land opportunities and many similar developments being proposed nearby
- The application has no evident support from the local Highways Authority, nor does it fit with Highways England's plans to reduce delays on cross-country strategic routes including the A43
- There is a likelihood that any economic benefit will be taken back to neighbouring local authorities by commuters

# Tiffield Parish Council

- We cannot see how this application is in any way sustainable as it will increase emissions of particulates, carbon dioxide and other gases. Additionally, the extra commuting, congestion and the buildings on the site will have adverse environmental impact on our residents, the local landscape and wildlife
- The application will increase the cycle of car dependency
- The development will contribute to climate change in a time of climate emergency

Taking the above concerns and others mentioned earlier together with:

- The certainty of increased traffic flows through Tiffield and the concomitant increased risk of death or injury to our residents and their children
- The as yet unknown visual impact of the development of the development on our residents
- The also unknown risks to our residents of increased nuisance and of noise, light and air pollution
- The discouraging effect the closure of the A43 Tiffield Lane crossing and its replacement will have on residents accessing Towcester sustainably by foot or bicycle
- The loss of the rural nature of one of the main access routes to the village for residents

We do not feel that the developers have yet shown that the residents of Tiffield will not be adversely affected by this application.

It is therefore with regret that we feel we cannot support the proposed Tiffield Lane development and object to the application.

Yours sincerely,

John Beasley

Chairman, on behalf of Tiffield Parish Council.

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Please direct correspondence to our Clerk, Andy Tennet

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