



Daventry District Council

Planning Policy

Lodge Road

DAVENTRY

NN11 4FP

planningpolicy@daventrydc.gov.uk

Daventry International Rail Freight Terminal (DIRFT) Expansion Design Guide

Adopted as a Supplementary Planning
Document

December 2005

Accompanying Sustainability Appraisal

Approved December 2005

REPORT ON CONSULTATIONS AND PUBLICITY

RESPONSES TO REPRESENTATIONS

CHANGES TO DRAFTS

Daventry International Rail Freight Terminal (DIRFT) Expansion Design Guide

Introduction

The Design Guide provides guidance for future development at DIRFT.

At its meeting on 21 July 2005 the Council's Strategy Group approved the draft Design Guide for the purposes of consultation. It was accompanied by a Sustainability Appraisal (Consultation Draft).

Consultation

During the week commencing Friday 12 August over 700 letters and emails were sent to organisations, town and parish councils and individuals who were listed on the Council's database. In addition, a workshop was held with the Junction 18 Liaison Forum, which is attended by representatives of local parish councils.

Publicity

The draft Design Guide was posted on the Council's website under both the planning consultation and the news sections.

The Council placed advertisements in the Daventry Express, The Northampton Chronicle and Echo and the London Gazette. A copy of the advertisement is included at Appendix A. A press release was also prepared (Appendix B), which appeared in the Daventry Express and the Chronicle and Echo on 12th September 2005. Councillor Wendy Amos was also interviewed about this document on BBC Radio Northampton 17th August.

Consultation Period

The consultation period ended at 4.30pm on Friday 23rd September 2005.

Comments received.

26 organisations and individuals responded to the Design Guide consultation. Appendix C contains a summary of all the representations. 6 comments were received to the Sustainability Appraisal consultation. Appendix D contains a summary of all the representations. Copies of the full representations can be viewed at the Council's offices by prior appointment.

Consideration of Responses

The representations were reported to the Council's Strategy Group at its meeting on 24 November 2005 and Full Council on 8 December 2005. The Council agreed a response to each of the comments and agreed, where appropriate, changes to the document in response to the comments.

Advertisement

DAVENTRY DISTRICT COUNCIL

PLANNING AND COMPULSORY PURCHASE ACT (2004)

DAVENTRY DESIGN CODES (CONSULTATION DRAFT) AND SUSTAINABILITY APPRAISAL (CONSULTATION DRAFT)

and

DAVENTRY INTERNATIONAL RAIL FREIGHT TERMINAL EXPANSION DESIGN GUIDE (CONSULTATION DRAFT) AND SUSTAINABILITY APPRAISAL (CONSULTATION DRAFT)

The District Council's Strategy Group has resolved to invite comments on these documents. Once adopted they will supplement the policies and proposals of the Local Plan and emerging Local Development Framework.

Both documents set out draft design principles of how the Council expects to see Daventry town centre and urban extensions, and the Terminal Expansion area developed respectively. These are accompanied by their draft sustainability appraisals.

The Council welcomes comments from any interested party on these documents. The documents are available for inspection at Planning Reception, Daventry District Council, Lodge Road, Daventry; the libraries at Daventry, Moulton, Kingsthorpe, Long Buckby, Woodford Halse and Brixworth; and the Council's Outreach Centres at Woodford Halse and Brixworth during normal opening hours.

A copy is available on the Council's website (www.daventrydc.gov.uk/planningconsultation)

Comments in writing should be forwarded to Karen Britton, Senior Planning Officer, Daventry District Council, Lodge Road, Daventry, Northamptonshire, NN11 4FP or e-mail kbritton@daventrydc.gov.uk by 4.30pm on Friday 23rd September 2005 at the latest. Comments cannot be accepted after this time.

Ossie Williams
Corporate Manager



NEWS AND INFORMATION

MARKETING AND COMMUNICATIONS

Lodge Road, Daventry, Northants, NN11 4FP
Telephone 01327 302404 Fax 01327 876543
Website: www.daventrydc.gov.uk
Email: news@daventrydc.gov.uk

PR 253

16 August 2005

For Immediate Release

Designs on the Future – Your Views Sought

Daventry District Council is seeking district resident views on two design documents relating to Daventry town centre and the expansion of Daventry International Rail Freight Terminal (DIRFT).

Residents have until 4.30pm on Friday, 23 September 2005, to lodge their opinions on both of these consultation documents.

The Daventry Design Codes are a set of design rules and requirements that affect future development; they are a new planning technique. Daventry District Council will be one of the first planning authorities to adopt design codes.

Specialist urban design consultant Halcrow Group, has prepared the design code document for Daventry, which includes a strategic level design code for the town and design principles that could be applied to potential urban extensions to the town. The code aims to improve the future design quality of developments and ensure that local character is respected. This comprehensive document covers everything from general sustainable design techniques, such as the use of building material and water efficiency through to guidance on public art. It also provides design principles for particular geographic areas of the town centre.

With respect to the DIRFT Design Guide, Daventry District Council is consulting on a Design Guide for the DIRFT expansion area (54 hectares to the west of the existing DIRFT facility).

More...

Designs on the Future – Your Views Sought.../2

The guide highlights the general design considerations that any development proposals will need to consider, for example local landscape character, sustainable transport and access. It also contains more specific site design guidance, such as including the type of lighting to be used and ways of developing the area more sustainably by incorporating water and energy efficient designs. In particular, it recommends a requirement for commercial/industrial buildings of over 1,000 sq m to guarantee that 10 per cent of their on-site energy use comes from renewable sources.

Both the draft DIRFT Design Guide and the draft Daventry Design Codes are accompanied by draft Sustainability Appraisals. These consultation documents are available for inspection at Daventry District Council's planning reception (Lodge Road, Daventry), at the libraries at Daventry, Moulton, Kingsthorpe, Long Buckby, Woodford Halse and Brixworth and also at the council's information centres in Woodford Halse and Brixworth during normal opening hours.

They are also available on the council's web site www.daventrydc.gov.uk/planningconsultation . Written comments on the documents should be addressed to the Senior Planning Officer, Planning Policy, Daventry District Council, Lodge Road, Daventry, Northamptonshire NN11 4FP or email them to planningpolicy@daventrydc.gov.uk .

-Ends-

For further information please contact:

For further information please contact:

Josie Goodwin, Daventry District Council on 01327 302404 or jgoodwin@daventrydc.gov.uk

Appendix C

Daventry International Rail Freight Terminal Expansion Design Guide

Responses To Consultation Draft

The table sets out a summary of all responses received within the consultation deadline. Those replying with “no comment” have been listed first in the table, with the remainder having been placed within the table in no particular order. The full list of respondees is given below. At the end, a section has been included which sets out additional key changes proposed by the Senior Planning Officer, Daventry District Council.

Respondees List

1. East Midlands Regional Assembly
2. Northamptonshire Police
3. Anglian Water
4. Warwickshire County Council (Transport Planning Team)
5. Wilbraham & Co (Legal Advisers for DIRFT Ltd)
6. Network Rail (Mineral and Waste Operations)
7. The Highways Agency
8. Northamptonshire Probation Service
9. The National Trust
10. The Theatres Trust
11. Kilsby Parish Council
12. Environment Agency
13. Daventry Villages Together
14. Nathaniel Lichfield & Partners (Planning Consultants for DIRFT Ltd)
15. Byfield Parish Council
16. Ms C Grey – Local Resident (the address was not given in her response)
17. Northamptonshire County Council (Spatial Planning)

18. Rugby Borough Council (Policy & Design)
19. Crick Parish Council
20. Northamptonshire County Council (Built and Natural Environment Team)
21. STOP (The Over-Development of Northamptonshire)
22. Councillor C Lomax – Daventry District Councillor- Barby & Kilsby Ward
23. Countryside Agency (Landscape, Access and Recreation Division)
24. Ms N Allman – Nortoft Lodge Barn (Local Resident)
25. T and C Dougan, M and H Cheney, J and M Browne (Residents of Kilsby)
26. Junction 18 Liaison Forum

Abbreviations

- DIRFT = Daventry International Rail Freight Terminal
 DG = Design Guide
 DDC = Daventry District Council
 LPA = Local Planning Authority
 MDPE = Medium density polyethylene
 NCC = Northamptonshire County Council
 PPS = Planning Policy Statement

| Respondee | Summary of Comment | Response | Changes to Design Guide |
|---|--|--|--------------------------------|
| Network Rail – Mineral and Waste Operations | No comment | N/A | None |
| Northamptonshire Probation Service | No comment | N/A | None |
| The National Trust | No comment | N/A | None |
| The Theatres Trust | No comment | N/A | None |
| Highways Agency | No comment – apart from wish to be consulted re- applications as traffic | Confirm that consultation on planning applications will be | None |

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| | generated may impact on A5 and M1. | carried out with the Highways Agency – this is a standard planning procedure. | |
| East Midlands Regional Assembly | Lack of inter-modal freight capacity in the East Midlands is highlighted within the Regional Transport Strategy. DIRFT expansion is broadly consistent with Regional Transport Strategy Priorities. The DG will help ensure development takes place in the most sustainable manner. | Points welcomed. | None |
| Northamptonshire Police | <p>Existing DIRFT area is in comparison to other industrial areas in Western Police Area a low crime area. Suggest this is due to the in-built security on most units and it is important that this continue.</p> <p>Majority of crime on DIRFT relates to the construction period – suggest on-site security from commencement of projects is made a planning requirement.</p> <p>All parking should be within the secured area of each unit to enable surveillance.</p> <p>Roads on the Expansion site must not become trucking parking areas due to most crimes on HGVs being committed under this circumstance.</p> | <p>DG promotes crime and design measures. Ensure DG refers to in-built security for all units.</p> <p>DG to be amended to highlight this.</p> <p>DG to be amended to highlight this.</p> <p>DG to be amended to highlight this.</p> | <p>Amend DG</p> <p>Amend DG</p> <p>Amend DG</p> <p>Amend DG</p> |
| Anglian Water | Existing 180mm MDPE at the A428/A5 roundabout by Halfway House does not have capacity to supply proposed expansion area. Extensions to 180mm MDPE main in Danes Way linking into 180mm MDPE at Halfway House would be | DG to be amended to highlight to Developers that they will need to consult Anglian Water at an early stage to discuss their requirements. | Amend DG |

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| | <p>necessary. Offsite mains would be needed to supply new area off A428. Most appropriate route would need to be established at time of development.</p> <p>Reinforcement of approx. 450m of main in Crick may be necessary to reinforce supply from West Haddon – reinforcement of supply into West Haddon Reservoir may be required to maintain levels i.e upgrading pumps at Ravensthorpe WTW and reinforcement of main at Ravensthorpe Village to the reservoir.</p> <p>Once detailed development and demand proposals are known site can be assessed. If expansion takes place in phases may supply part of expansion whilst works take place.</p> <p>If process water is required, developers should be advised to forward details of estimated peak water requirements so that detailed assessment can be carried out.</p> | | |
| <p>Warwickshire County Council (WCC) – Transport Planning Team</p> | <p>Any changes on A428 that fall within Warwickshire will need to be undertaken in consultation with WCC. Any significant changes to traffic flows on A428 or other roads in Warwickshire e.g B4429 Ashlawn Rd should be set out in a transport assessment and should include mitigation measures where appropriate – need to be agreed by WCC and Northamptonshire County Council. The Highways Agency are</p> | <p>The S106 attached to the planning permission requires DIRFT Ltd to use all reasonable endeavours to ensure that construction and commercial vehicles observe the Recommended and Restricted Map, which was prepared in consultation with Northamptonshire Highways.</p> | <p>Amend DG</p> |

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| | <p>responsible for the A5.</p> <p>The bus services do not provide a viable proposition for those wishing to travel to DIRFT by bus. Provision of new bus stops will not add fundamentally to accessibility of the area. Need long-term commitment from DIRFT to upgrade frequency of Northampton-Rugby services. Provide additional journeys from Rugby to DIRFT – likely to be 2 additional AM journeys and 2 additional PM journeys.</p> <p>Pleased to note commitment to pedestrian and cycle routes. This should include provision of off-carriageway route along A428 between DIRFT and edge of Rugby.</p> <p>Pleased to see that any new roundabouts will include off-carriageway facilities for cyclists which should improve safety especially if supplemented by provision of toucan crossings.</p> | <p>This Map, attached to the S106, in summary highlights M1 and trunk roads as the transport routes and is to be attached to the DG.</p> <p>The S106 attached to the outline planning permission requires a Travel Plan to be submitted. Developers will need to address public transport provision through this. Developers will need to discuss this with relevant transport authorities.</p> <p>The S106 funding requirements could be used to cover this – discussion will take place with relevant authorities in due course to discuss what public transport, pedestrian, cycle access projects take priority for funding.</p> <p>Again, the S106 funding requirements could be used to cover this – discussion will take place with relevant authorities in due course to discuss what public transport, pedestrian, cycle access projects take priority for funding.</p> | <p>None</p> <p>None</p> <p>None</p> |
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| <p>Wilbraham & Co</p> | <p>Legal problem re- guarantee of 10% energy use from renewables. Does not fall within terms of Condition 5 of 10 January 2005 planning permission which states: "details to address the promotion of energy efficient/conservation practices (sic) in the design and construction of buildings" – a mandatory requirement to purchase electricity from a particular source is not a "practice in the design and construction" of a building and outwith the scope of the condition – requirement fails and is unlawful. Even if it fell within the terms of the condition, it would be unenforceable and thus invalid. Provisions of the S106 attached to the permission make no reference to this requirement – S106 was appropriate vehicle for this.</p> <p>There is no basis in Government energy or planning policy for a mandatory requirement of this type.</p> | <p>The intention of this energy use section was to promote renewable energy production on site i.e renewable sources of energy via e.g solar panels/photovoltaic systems or other sustainable energy-creation designs within or attached to buildings etc <u>not</u> to tell developers etc where to purchase their electricity from.</p> <p>PPS22 Section 8 states that "Local Planning Authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial and industrial developments to come from on-site renewable energy developments". Section 18 states that: "Local Planning Authorities and developers should consider the opportunity for incorporating renewable energy projects in all new developments" and that "Local Planning Authorities should specifically encourage such schemes through positively expressed policies in local development documents". SPDs are local development</p> | <p>Amend DG</p> |
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| | | <p>documents. Some other Local Authorities are already implementing this type of policy e.g London Borough of Merton.</p> <p>New text to be inserted to read "Schemes for commercial/industrial buildings over 1,000 sq.m. shall incorporate renewable energy schemes which provide for at least 10% of their energy requirements. This might include, for example incorporating solar photovoltaics, wind turbines etc".</p> | |
| Kilsby Parish Council | <p>Para. 3.7 Wish to keep skyline limits as maximum height restrictions overall, would like to see actual height of Tibbett and Britten building (c.18m) as max. height for individual buildings.</p> <p>Height limit should include ancillary structures e.g masts, lift housing.</p> <p>Para. 4.11 Wish to see cycleways/footpaths provided within Kilsby Parish for benefit of local parishioners and alleviate problems</p> | <p>If a set metre height of building were applied, some buildings would appear more dominant, as the land they are built will vary in height i.e on higher ground a building would therefore appear bigger. As expressed the height limits provide certainty.</p> <p>DG to be amended to highlight this.</p> <p>The S106 funding requirements could be used to cover this – discussion will take place with</p> | <p>None</p> <p>Amend DG</p> <p>None</p> |

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| | <p>on local roads from increased traffic.</p> <p>Para. 5.10 Needs to be an improvement on DIRFT 1. Low light pollution must be a condition. Reflective light should be reduced – possibly by painting roofs a darker colour.</p> <p>Para. 5.2 Wish to see minimum of 10% of</p> | <p>relevant authorities in due course to discuss what public transport, pedestrian, cycle access projects take priority for funding.</p> <p>Annex 5 specifies lighting requirements that are required before consent will be given. It should be noted that any reflection off roofs themselves is unlikely, as lighting will not be aimed on roofs – wall and floorscape are the key to reflectivity. However, the DG should be amended to require developers to consider the visual impact of roofs and if appropriate, the developer shall incorporate a darker roof colour in a shade of green to be agreed with the LPA. When looking down onto flat roofs from above in longer views, in particular, a darker roof colour could blend better into the landscape. DDC Energy Officer and Building Control confirm that colour will not adversely impact on energy performance of buildings. This is for visual purposes.</p> <p>Confirm that this is the intention</p> | <p>Amend DG</p> <p>Amend DG</p> |
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| | <p>land set-aside for landscaping on all developments, including those with rail connections.</p> <p>Para. 5.23 On-going maintenance should be laid down and at least to standard on DIRFT 1. Should be timescale for maintenance. Landscaping must be provided in and out of site to mitigate noise and visual impact on Kilsby, especially to south of development. It was stated at J18 Forum that DIRFT had made available £40,000 to DDC for landscaping on land outside the development not owned by DIRFT to provide shielding. Feel sum is inadequate for length of boundary of site to south and that an increase be negotiated.</p> <p>Para. 6.4 Wish first sentence to read “Open Storage will not be permitted on these areas”.</p> | <p>– DG text to be amended to provide clarity.</p> <p>DG highlights details of requirements re- a Landscape Management Plan including 5 year maintenance time period. S106 money has been set aside for off-site landscape works and based on DDC experience, it is felt that this sum is adequate. As the S106 has already been agreed as part of the planning permission, it cannot be changed. The S106 funding can be used for any landscaping that the Local Authority identify and subject to landowner agreement. S106 funds could therefore be agreed potentially in this location. However, it should be highlighted that any planting proposals should not compromise operations or security of the railway.</p> <p>DG to be amended but clause to include additional alteration along the lines of “unless Daventry District Council is satisfied that the impact will not detract from surrounding areas”</p> | <p>None</p> <p>Amend DG</p> |
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| | <p>Para. 6.5 Wish 2nd sentence to read “All vehicle wheels SHALL be washed down before leaving sites”.</p> <p>Also wish to see prohibition on construction vehicles using roads within Kilsby plus Rugby Road (B4038) and Nortoft Lane).</p> <p>Wish to see regular air pollution monitoring of the site and surrounding area to ensure levels are not above legal limit.</p> | <p>The terms “shall” and “should” both have the same planning outcome, however it is noted that the use of both terms “shall” and “should” occur throughout the document – for consistency DG to be amended to use one – “shall “.</p> <p>The S106 attached to the planning permission requires DIRFT Ltd to use all reasonable endeavours to ensure that construction and commercial vehicles observe the Recommended and Restricted Map, which was prepared in consultation with Northamptonshire Highways. This Map, attached to the S106, in summary highlights M1 and trunk roads as the transport routes and is to be attached to the DG.</p> <p>The Council’s Environmental Health Team (EHT) who monitor local air pollution advise that within the District to date, only the M1 motorway corridor has provided figures above the legal limit. The nearest measuring tubes to</p> | <p>Amend DG</p> <p>Amend DG</p> <p>None</p> |
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| | <p>Would like to see reference to A361 not being suitable for HGV movements and signage to site only being from A5/A43/M1. Signs at either end of A361 should deter its use for access to M1 or M40 by HGVs.</p> | <p>DIRFT is at Heythag Farm just over half a mile away to the north-east. The EHT do not feel that additional monitoring is required here, however as with all sites they will keep this under review.</p> <p>The S106 attached to the planning permission requires DIRFT Ltd to use all reasonable endeavours to ensure that construction and commercial vehicles observe the Recommended and Restricted Map, which was prepared in consultation with Northamptonshire Highways. This Map, attached to the S106, in summary highlights M1 and trunk roads as the transport routes and is to be attached to the DG. For information, NCC have also carried out a survey of HGV traffic on the A361 and advise that traffic relating to DIRFT is minimal.</p> | <p>Amend DG</p> |
| <p>Environment Agency</p> | <p>Para. 5.11 -broadly agree with the statement that the expansion of DIRFT can be accommodated with due regard to flood risk.</p> | <p>Point welcomed</p> | <p>None</p> |

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| | <p>Para. 5.13 appears to be rather vague in stating that "The drainage system already established at DIRFT shall be extended to the expansion site." This could imply that connections from new developments can be made to the existing balancing ponds present and that there is sufficient capacity within the ponds to accept surface water from the DIRFT expansion. Alternatively, the 'drainage system' could simply mean a sustainable drainage systems (SuDS) approach. The paragraph should therefore be clarified and elaborated upon.</p> <p>We would suggest that in the drainage section, the guide should specifically state that SuDs should (or must) be incorporated into DIRFT expansion development. In addition, it should make prospective applicants aware that schemes for the provision of surface water runoff limitation should be submitted to and approved by the LPA. Such schemes should demonstrate that surface water runoff from the site will be attenuated (up to the 1 in 100 year rainfall event over a 48 hour period) to a rate no greater than the existing greenfield runoff rate (as agreed in writing by the LPA).</p> <p>In order to maintain access to watercourses for maintenance or improvement purposes and to provide for overland flood flows, request that the guide strongly discourage</p> | <p>DG to be amended to clarify this point.</p> <p>DG to be amended to highlight SuDs and related water requirements.</p> <p>DG to be amended to highlight issues raised.</p> | <p>Amend DG</p> <p>Amend DG</p> <p>Amend DG</p> |
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| | <p>new buildings or other structures (including gates, walls and fences) or raised ground levels within 5 metres (8 metres in the case of Clifton Brook) of the top of any bank or watercourse and/or within 5 metres of the side of an existing culverted watercourse. Prospective developers should be advised to contact the Environment Agency if such works are proposed, as written consent may be required under the terms of the Water Resources Act 1991 or the Land Drainage Byelaws.</p> <p><i>SuDS</i> which should be specifically stated as a requirement for new development as discussed above, should include wetlands, swales and ditches etc to help treat runoff and provide habitat for wildlife. The use of above ground sustainable drainage allows the creation of wildlife corridors. Any sustainable drainage system must be designed to balance storm water flows and essentially to treat and hold pollution events that may occur to prevent contamination of receiving watercourses. All car parks should be designed with <i>SuDS</i> in mind. Car parks should be broken up with the use of swales to treat and convey runoff from the hard standing. Swales planted with reeds will break up the hard landscape, providing habitat for wildlife and improving the aesthetics of the area.</p> | <p>DG to be amended to highlight <i>SuDS</i>.</p> | <p>Amend DG</p> |
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| | <p>The Guide uses the term 'semi-native' in discussing the trees and shrubs to be used for landscaping in the development. This is somewhat misleading as trees and shrubs are either native or they are not.</p> <p>A guiding principle of the landscaping, to be emphasised in the design guide, should be the use of native trees and shrubs throughout. Non-natives and ornamentals are often of very limited ecological value and can be detrimental to local wildlife, by inadvertently spreading disease to native plants and through cross fertilisation with natives, hybrids and ornamentals (e.g. ornamentals such as <i>Fraxinus excelsior</i> 'Westhof Glorie') resulting in the proliferation of non-native varieties.</p> <p>Consideration should be given to the future planting of native woodland ground flora along wooded corridors, once the corridors have established.</p> <p>All areas of new grassland should be planted with native wildflower and native grasses of local provenance to provide native wildlife corridors throughout the development.</p> <p>The entire development should be</p> | <p>Technically, semi-native are those species that have been present within the country for a long time (e.g hundreds of years), and therefore people assume are native, yet are not actually historically native to the country.</p> <p>DG aims to promote this – DG to be amended to clarify that native species are given priority.</p> <p>DG to be amended to highlight this.</p> <p>DG to be amended to highlight this.</p> <p>DG to be amended to highlight</p> | <p>None</p> <p>Amend DG</p> <p>Amend DG</p> <p>Amend DG</p> <p>Amend DG</p> |
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| | <p>designed in such a manner that wildlife is encouraged to migrate to, from and through the area without entailing undue hazards. This will involve designing the built environment around linear wildlife corridors (perhaps along the routes of SuDS features).</p> <p>All watercourses through the development should be given a sufficient corridor such that they can cut their own course through the site through the duration of the development. Locating built structures in close proximity to watercourses is likely to result in future problems - request that these comments be incorporated, perhaps within Para. 5.24 (viii).</p> <p>Acknowledge Para. 5.62 but would encourage additional requirements to the effect that new development should be designed in such a manner that great crested newts are able to migrate to and from their new colony (sanctuary) to new pools that should be located throughout the development along wildlife corridors.</p> <p>Para. 5.7 - In addition to the measures listed, suggest that you add that outdoors, the installation of a rainwater collection reservoir can provide a supply of free water for use in certain industrial processes. Simple treatment systems exist that allow rainwater to be used to supply WCs within</p> | <p>this.</p> <p>DG to be amended to highlight this.</p> <p>The issue of the newts on site has already been discussed and agreed with English Nature and a plan of action established.</p> <p>Already covered by DG.</p> | <p>Amend DG</p> <p>None</p> <p>Amend DG</p> |
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| | <p>the development. Water saving techniques specific to certain types of industry should be considered, such as filtering and recycling wash waters or boiler blow-down waters.</p> <p>The guide makes little reference to pollution prevention measures, and suggest that potential applicants or developers should be referred to the Pollution Prevention Guidelines available on the Environment Agency's web site at www.environment-agency.gov.uk/ppg .</p> <p>We would encourage the inclusion of a statement that prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from lorry parks and/or parking areas for fifty car park spaces or more and hardstandings should be passed through an oil interceptor designed compatible with the site being drained.</p> <p>Finally, note that in the 'Further Information' section of the draft guide, our National Water Demand Management team is listed as the Environment Agency contact. Please could you include the Planning Liaison team contact details and address (as below) as the Environment Agency contact for pre-application advice.</p> | <p>DG to be amended to highlight this.</p> <p>DG to be amended to highlight this.</p> <p>DG to be amended to highlight this.</p> | <p>Amend DG</p> <p>Amend DG</p> <p>Amend DG</p> |
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| <p>Daventry Villages Together</p> | <p>Para. 1.1 The Design Guide should state how many people are currently employed there and in what kind of jobs. Should also state how many people are likely to be employed and in what jobs. If, as we suspect they are low-paid, low-skilled jobs then DDC should be working hard to create opportunities for skilled labour.</p> <p>Employment, education and training are the key to sustainability. DDC should co-ordinate plans for DIRFT with other plans and initiatives of bodies e.g EMDA, GOEM, Northampton Chamber of Commerce and WNDC.</p> <p>Have reservations about the design of buildings at DIRFT, believe it makes sense to have buildings of this type all in the same area so that large sheds are not built within 2 miles of Daventry Town Centre and Daventry can be an attractive environment to live in.</p> | <p>The DG deals with the design issues, not the principles of DIRFT being established.</p> <p>Confirm that DIRFT fits into the plans and objectives of a large number of other agencies, all of which are consulted throughout the planning process of DIRFT.</p> <p>Point noted.</p> | <p>None</p> <p>None</p> <p>None</p> |
| <p>Nathaniel Lichfield & Partners on behalf of DIRFT Ltd</p> | <p>DIRFT Ltd consider the draft DG is well drafted and includes a level of detail consistent with the document's purpose.</p> <p>DIRFT Ltd has been happy to support Council's objectives of adopting the DG as a SPD – length of time that this process introduces and potential delay in implementation of the development is regarded as unfortunate.</p> | <p>Point welcomed.</p> <p>Planning legislation dictates the procedures required and their timescale.</p> | <p>None</p> <p>None</p> |

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| | <p>Para. 2.8 Information here represents situation at time of drafting- It is suggested that a factual description at the time of adoption and publication of SPD be incorporated.</p> <p>Para. 3.7 Tibbett and Britten no longer occupies the building following purchase by Exel which is itself subject of potential acquisition. For interest of longevity request reference to T & B be deleted.</p> <p>Para. 5.6 point 5 Supports sustainable design, however the requirement for energy does not accurately reflect PPS12 i.e for local authorities to be consistent with national planning policy and in general conformity with regional planning policy. The Consultee then set out all policies relevant. In summary, these were PPS 1 Para. 26 iii and iv; PPS22 Para. 8 I and ii; companion guide to PPS22 Para. 4.13; RSS8 Policy 4, 40 and Annex 6 – Draft Energy Strategy; MK and SM Sub-Regional Strategy – Policy 3; Northamptonshire County Structure Plan – EN1; Daventry District Local Plan – no policies. A policy analysis was then provided which the Consultee states that there is no current planning policy requirement placed on developers to provide on site renewable energy facilities unless a policy exists in the Local Plan.</p> | <p>DG to be amended to take this on board.</p> <p>DG to be amended to highlight this change.</p> <p>As stated before PPS22 Section 8 states that “Local Planning Authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial and industrial developments to come from on-site renewable energy developments”. Section 18 states that: “Local Planning Authorities and developers should consider the opportunity for incorporating renewable energy projects in all new developments” and that “Local Planning Authorities should specifically encourage such schemes through positively expressed policies in local</p> | <p>Amend DG</p> <p>Amend DG</p> <p>None</p> |
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| | <p>DIRFT request 10% guarantee be removed and the Carbon Trust be removed and inserted as a footnote i.e for information.</p> <p>DIRFT concerned that reference to guaranteed use of energy will result in Council imposing conditions on approval of reserved matters or detailed planning permissions which contain similar requirements – these would be unreasonable and unenforceable. Reference also made to circular 11/95 Use of Planning Conditions in Planning Permissions – enforceable – impossible to prove that energy from third party resource comes from renewable sources. Impracticable to monitor the energy source and difficulties for Council to demonstrate contravention had occurred. Term “guarantee” considered unreasonable as unduly restrictive – request Para. 5.6 be drafted as: “Offer opportunities to provide energy from renewable sources¹ on commercial/industrial buildings over 1,000 sq m”¹ <i>Attention is drawn to the</i></p> | <p>development documents”. SPDs are local development documents. Some other Local Authorities are already implementing this type of policy e.g London Borough of Merton.</p> <p>Text to be re-worded as per Wilbraham & Co response above. DG to be amended to refer to The Carbon Trust in a footnote.</p> <p>The intention, which was unclear from the wording was that energy should come from renewable sources i.e by the developer incorporating solar schemes etc <u>not</u> that they had to purchase power from third parties. This policy is already being operated in some other local authorities. Text to be reworded as per Wilbraham & Co response above.</p> | <p>Amend DG</p> <p>Amend DG</p> |
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| | <i>Government's objective of providing 10% of energy from renewable sources by 2010 and advice is available from The Carbon Trust relates to energy efficiency initiatives (see section 7.0).</i> | | |
| Byfield Parish Council | Concerned re-traffic impact on A361. No evidence of effect on communities on A361, which is already used by much commercial traffic. No evidence of scheme to ensure A361 not used to link M1 and M40 and HGVs made to use A5 and A43. Raise issue of road signage links and that A361 not suitable for HGV. | The S106 attached to the planning permission requires DIRFT Ltd to use all reasonable endeavours to ensure that construction and commercial vehicles observe the Recommended and Restricted Map, which was prepared in consultation with Northamptonshire Highways. This Map, attached to the S106, in summary highlights M1 and trunk roads as the transport routes and is to be attached to the DG. For information, NCC have also carried out a survey of HGV traffic on the A361 and advise that traffic relating to DIRFT is minimal. | Amend DG |
| Ms C Grey | When will this development end – can see it in time joining up to Kilsby, Crick, Clifton all becoming suburbs of Rugby amongst a mass of warehouse development? | The DG deals with the design issues, not the principles of DIRFT being established. The respondees comments relate primarily to the later. The Outline Planning Permission sets out the area to be covered | None |

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| | <p>Why are new buildings being built when there is still space advertised in the original part of DIRFT? Will we end up with miles of warehouses all empty?</p> | <p>by the current permission.</p> <p>As above comment, however the allocated areas are almost fully occupied. Demand for such buildings remains strong.</p> | <p>None</p> |
| | <p>Why can't these developments be done in semi-industrial brown field sites – why take up acres of countryside and grazing land?</p> | <p>As above comment, however DIRFT was identified through Regional Planning Guidance as a key location for industrial use due to its central location within the country, opportunities to connect it to the rail system and also close proximity to the M1, in particular. Unfortunately, there are no brownfield sites of this size locally that could accommodate such development.</p> | <p>None</p> |
| | <p>What improvements will be made to local roads/transport links? Since DIRFT there has been a slight improvement to the A361 in places – apart from that, the road I use to go to work (Ridegway from Kilsby to A45) is dogged by huge lorries trying to use a short cut on a totally unsuitable road?</p> | <p>The Developer will need to discuss and agree this with the relevant highway authority/District Council. The DG needs to be amended to highlight this. As highlighted elsewhere a Recommended and Restricted Map has already been prepared in consultation with Northamptonshire Highways. This Map, attached to the</p> | <p>None</p> |

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| | <p>Why can't there at least be an odd benefit to local villages by such developments – ie why is there still no gas in Kilsby despite the fact that we live so near an urban sprawl of warehousing?</p> <p>Where are all the workers going to come from – as far as I know, temps are bussed down from other areas as there is so little unemployment in the Rugby area?</p> | <p>S106, in summary highlights M1 and trunk roads as the transport routes and is to be attached to the DG.</p> <p>Under planning legislation we can only require developers to provide items or contributions that are directly relevant to their development – the provision of a gas supply to a local village is not an appropriate item.</p> <p>As earlier comments, the DG deals with the design issues, not the principles of DIRFT being established. Planning set the criteria to enable the employment infrastructure/development to take place, however they do not have the power over who wishes to work where.</p> | <p>None</p> <p>None</p> |
| <p>Northamptonshire County Council – Spatial Planning</p> | <p>Generally provides a clear and robust set of principles – also a suitable length to allow reader a clear understanding of site history and wider planning context.</p> <p>Para. 4.2 NCC wish to re-state their position that the expansion should be rail based.</p> <p>Sustainable Building Design – section should refer to waste management and</p> | <p>Comments welcomed.</p> <p>This is promoted through the Outline Planning Permission and details attached to it.</p> <p>DG to be amended to highlight these points.</p> | <p>None</p> <p>None</p> <p>Amend DG</p> |

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| | <p>sustainable construction methods- minimise waste and re-use and recycle materials. Make clearer reference to developers locating waste management facilities for separation, storage and collection of waste.</p> | | |
| <p>Rugby Borough Council – Policy & Design</p> | <p>Para. 4.10 suggest reworded as follows: “The landscape strategy shall <i>respect</i> the landscape character of the area surrounding the site. The landscaping of the whole site shall be driven by the aim to present a character of landscape which <i>shields and</i> softens the size and layout of the proposed buildings and spaces between them.”</p> <p>Para. 4.11 states that the development could remove 56,000 HGVs from the regions trunk roads each year. Is this every year – How has this calculation been arrived at and is this every year from the time the development is completed, if so, will there eventually be no HGVs on the road? It is considered that this statement is a bit ambiguous and needs to be clarified.</p> <p>Para. 5.23 – the site is very exposed and it is considered that this section seems to focus primarily on ornamental landscaping. This section needs to highlight more the role of planting and screening of long distance views into the site, such as the</p> | <p>It would not be possible to totally “shield” buildings of this size within the landscape – this phrase would therefore be unworkable. Para. 5.26 already covers issue of screening.</p> <p>DG to be amended to provide clarity.</p> <p>DG text to be amended to include this.</p> | <p>None</p> <p>Amend DG</p> <p>Amend DG</p> |

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| | <p>positioning and spacing of trees, which is extremely important in shielding the site.</p> <p>Annex 1 – the third bullet point under “Sustainable Development Benefit Associated with Dirft” has an identical objection to that of Para. 4.11 above, in that 56,000 HGV movements per year from the regions roads will be removed each year. How has this calculation been arrived at and is this every year from the time the development is completed, if so, will there eventually be no HGVs on the road? This statement is ambiguous and needs to be clarified.</p> <p>Annex 5 Para. 2.1 Task Lighting needs to contain some context rather than listing publications. What are the advised levels from the listed guidance?</p> | <p>DG to be amended to provide clarity.</p> <p>The Lighting Consultant advises that the DG cross-references to the publications, as the DG would become too lengthy and unwieldy if all of the different lighting scenarios and hence guidance set out in these publications were repeated. The DG to be amended therefore to briefly highlight the type of content covered by them.</p> | <p>Amend DG</p> <p>Amend DG</p> |
| Crick Parish Council | <p>Para. 3.6 Concerned that proposed height restriction for buildings to the south of the A428 is proposed to be 137m AOD, the height of the building DIDC1 (Tibbet & Britten) on DIRFT South. This building was constructed to a height in excess of the</p> | <p>The Case Officer confirms that the DIDC1 building does not exceed the restriction. The height limits are a condition of the current Outline Planning Permission.</p> | <p>None</p> |

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| | <p>original planning maximum, despite our objections at the time. The fact that this building now exists to a height of 137m AOD does not in any way justify any future construction on DIRFT 2 being allowed to match this height. We urge that the maximum height allowed south of the A428 should not exceed that proposed on the north of the A428. Because of the varying levels across the site, we also recommend that a maximum height of 30m should apply to any individual building.</p> <p>Para. 4.11 Urge that every avenue be explored to maximise rail usage.</p> <p>Para. 5.10 Support lighting constraints in Annex 5, particularly that the “Sky Glow” limitation be reduced to zero. There is already considerable light pollution affecting this village from the developments at DIRFT 1, and we do not consider that any increase is acceptable.</p> <p>Para. 5.20 Support the proposal that there shall be a maximum of one non-illuminated sign per elevation.</p> | <p>Height limits are fixed against AOD as this provides the base level. If a standard size height is given e.g 30m then this would appear higher if built on rising land, hence appearing even higher and having more impact.</p> <p>Confirm that this is the intention for this site and that this is specified in the DG.</p> <p>Noted – DG aims to minimise light pollution</p> <p>Noted</p> | <p>None</p> <p>None</p> <p>None</p> <p>None</p> |
| <p>Northamptonshire County Council – Built and Natural Environment Team</p> | <p>Landscape Character – the assessment of the impact of the development on landscape should use, as a baseline data set, the Current Landscape Character Assessment (part of the Northamptonshire</p> | <p>Outline Planning Permission has already been granted for the site expansion area and an Environmental Impact Assessment was carried out.</p> | <p>Amend DG</p> |

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| | <p>Environment Character Assessment). This data set provides a comprehensive and integrated analysis of all the facets of the landscape, including physiographic, land use, historic, ecology and culture. It provides an environmental baseline data source, and we would recommend that it is used as such for this design guide.</p> <p>Para. 4.10 should be strengthened to indicate that the landscape strategy should seek to enhance and conserve the landscape character, as described in the Landscape Character Assessment.</p> <p>Para. 5.13 mentions that the drainage system already established at DIRFT will be extended to the expansion site. We would like to see further information about this, and what impact this will have on the landscape. We would also welcome consideration of a SUDS scheme; this does not appear to have been covered as an option.</p> <p>Paras. 5.23 – 5.60 (Landscaping) should also draw on data from the Current Landscape Character Assessment; the landscaping proposals should be informed and developed in line with the character assessment in order to minimise any adverse impacts.</p> <p>Recommend that use of non-native species</p> | <p>However, the LCA can be referred to as a tool that could assist in providing additional background information for the design of individual sites. DG to refer to LCA.</p> <p>DG to highlight this.</p> <p>DG to be amended to highlight this.</p> <p>LCA to be referred to.</p> <p>Amend DG to highlight use of</p> | <p>Amend DG</p> <p>Amend DG</p> <p>Amend DG</p> <p>Amend DG</p> |
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| | <p>is limited. Para. 5.27 notes that native / indigenous species are used. This is welcome, but should be limited to species that are drawn from those native to the local area and characteristic. Pines, for instance (as illustrated in Figure 9) would not be appropriate. Locally native species that could be used are included in the Current Landscape Character Assessment and the Biodiversity Character Assessment. Para. 5.27 also notes that evergreens will be used to provide all round cover. We would advise against this (where these are not native), as it would have a negative impact on landscape. The use of locally native species will minimise the negative impact on the landscape and also on biodiversity.</p> <p>Recommend mounding and bunding are kept to an absolute minimum, and that bunding is designed to look naturalistic and avoids an engineered appearance. Contours should not exceed 1:25 on the outer slope and 1:5 along the inner slope (to the site itself), which will appear more naturalistic particularly if the height is variable. This approach aims to minimise the negative impact on landscape.</p> <p><u>Paras.</u> 5.61 and 5.62 does not give consideration to the current biodiversity resource. We would recommend that any lost habitats or species covered in the</p> | <p>native species as per these comments.</p> <p>Para. 5.30 highlights that “gentle mounding shall be introduced where landscape design character dictates...”, however DG to be amended to provide more detail/clarity.</p> <p>An Environmental Impact Assessment was carried out as part of the outline planning permission. Paras. 5.61 – 5.62</p> | <p>Amend DG</p> <p>Amend DG</p> |
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| | <p>Northamptonshire Biodiversity Action Plan (BAP) should be replaced or compensated for. Any enhancement measures should aim to provide BAP habitats and / or habitat for BAP species. In biodiversity terms, as well as landscape terms, we would recommend the use of native species preferably of local provenance for planting.</p> | <p>highlight biodiversity issues. DG to be amended to strengthen this section and highlight these points.</p> | |
| <p>STOP (The Over-Development of Northamptonshire</p> | <p>Para. 5.6 – Mitigation of Impacts. “Providing opportunities” is too vague. Why can plans not be prescriptive (in mitigation of noise and visual impacts)?</p> <p>Para. 5.10, Annex 5 - Reference to Lighting Regulations is esoteric. What is the actual policy on minimising light effects, especially in terms of turning unnecessary lighting off at night?</p> | <p>Point noted – DG to be amended to “maximise the mitigation of impacts...”</p> <p>The Lighting Consultant advises that the DG cross-references to the publications, as the DG would become too lengthy and unwieldy if all of the different lighting scenarios and hence guidance set out in these publications were repeated. The DG to be amended therefore to briefly highlight the type of content covered by them. DIRFT is a 24-hour operation, therefore lighting needs to fit its purpose. Specific lighting requirements will be considered by the LPA as part of any future planning applications.</p> | <p>Amend DG</p> <p>Amend DG</p> |
| | <p>Annexes 2-5 - <i>Populus tremula</i> and <i>betula</i></p> | <p>Amend DG as per comments –</p> | <p>Amend DG</p> |

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| | <p><i>pendula</i> may be cheap and fast growing but are rare in this countryside. They should be minimised, preferably deleted. Some horsechestnut, sweet chestnut and beech would give a much richer treescape and green environment in years to come, and are more common in the district than landscapers would have you suppose.</p> | <p>also include sycamore in this list.</p> | |
| <p>Councillor C Lomax – Daventry District Councillor- Barby & Kilsby Ward</p> | <p>Welcome Council's intention to encourage original and innovative design, and hope that this will be positive and explicit encouragement.</p> <p>Rail link should be built first, thereby ensuring that this will be a development that capitalizes on its location and may possibly serve to reduce the overall number of HGVs on our roads.</p> <p>A5 and A428 should be improved before building commences. Re-routing of HGV traffic to avoid its using the grossly inadequate A361 through Kilsby and between Kilsby and Daventry and/or substantial upgrading of the A361. Weight restrictions throughout the rest of the village of Kilsby. Weight limits imposed on Nortoft Lane, the Ridgeway and Longdown Lane, both during construction and thereafter.</p> | <p>Points welcomed – DG to be strengthened to highlight that design is of key importance and that sustainable, original and innovative designs will be actively considered.</p> <p>Confirm that the rail link shall be provided as per the S106 requirements i.e has to be built before any building is occupied.</p> <p>The S106 attached to the planning permission requires DIRFT Ltd to use all reasonable endeavours to ensure that construction and commercial vehicles observe the Recommended and Restricted Map, which was prepared in consultation with Northamptonshire Highways. This Map, attached to the S106, in summary highlights M1 and trunk roads as the</p> | <p>Amend DG</p> <p>None</p> <p>Amend DG</p> |

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| | <p>Footpaths and cycleways developed within and around the site, and linking with existing footpaths and minor roads.</p> <p>Given the proximity to Kilsby and the topography of the area, particular care should be taken with lighting to avoid seepage southwards out of the site.</p> <p>Requirement for 10% energy usage from renewable resources lacks ambition and foresight. In view of current national and global debates and expectations around energy it would be reasonable to require not less than 25 – 33%.</p> <p>Landscape – Southern boundary in particular should have a native/indigenous tree belt to mitigate the views from Kilsby village and to provide wildlife corridor. Also planting within the site, trees, shrubs, hedges, grassed areas, to enhance the</p> | <p>transport routes and is to be attached to the DG. For information, NCC have also carried out a survey of HGV traffic on the A361 and advise that traffic relating to DIRFT is minimal.</p> <p>Footpaths and cycleways and links are highlighted in the DG.</p> <p>Care re- lighting generally is highlighted in the DG – it is the intention to ensure minimum necessary lighting throughout, hence not highlighting that lighting requirements should be different in certain areas.</p> <p>This figure has been based on research of the issue. It is currently being operated as a target in a number of other authorities and is felt to be realistically achievable, but wording will be changed.</p> <p>The S106 funding can be used for any landscaping off-site that the Local Authority identify and subject to landowner agreement. S106 funds could therefore be agreed potentially</p> | <p>None</p> <p>None</p> <p>None</p> <p>Amend DG</p> |
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| | <p>environment, soften the appearance of the buildings and to encourage wildlife. This should be above the minimum considered essential for a sustainable wildlife presence.</p> <p>Welcome 5.40, 5.62, 5.63.</p> <p>Buildings – Consideration should be given to the use of more grey/green shades of the buildings to soften the views into the site, which will be visible at considerable distances.</p> | <p>to the south, however it should be highlighted that any planting proposals should not compromise operations or security of the railway – location(s) will therefore require detailed consideration. DG to be amended para. 5.61 to “enhance and add to biodiversity...”</p> <p>Points welcomed – for clarification respondents 5.62 and 5.63 should read 5.61 and 5.62 respectively.</p> <p>Pale colours are felt to blend more into the landscape/skyline views. However, the DG should be amended to require developers to consider the visual impact of roofs and if appropriate, the developer shall incorporate a darker roof colour in a shade of green to be agreed with the LPA. When looking down onto flat roofs from above in longer views, in particular, a darker roof colour could blend better into the landscape. DDC Energy Officer and Building Control confirm that colour will not adversely impact on energy performance</p> | <p>None</p> <p>Amend DG</p> |
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| | <p>This site could be an exemplar for excellent and innovative energy and resource reduction. Water reduction and reuse, together with solar panels and micro-wind harnessing, should be expected as the norm in design. The requirements on these issues should be far more challenging and robust.</p> | <p>of buildings.</p> <p>Support comment, however expert advice has been sought and a target figure of a minimum of 10% is felt to be realistic.</p> | <p>None</p> |
| <p>Countryside Agency – Landscape, Access and Recreation Division</p> | <p>Support Para. 4.10 – states that the landscape strategy shall have regard to the landscape character of the area surrounding the site.</p> <p>Support section on Sustainable Building Design.</p> <p>The section on landscaping is comprehensive and LAR is supportive of the approach taken. We would however question if there is any opportunity for public access to the proposed nature areas and whether any public Rights of Way are affected by the proposal.</p> | <p>Point welcomed</p> <p>Point welcomed</p> <p>DG to be amended to highlight public access opportunities should be provided to nature areas where this is not detrimental to site security. Confirm no Rights of Way are effected.</p> | <p>None</p> <p>None</p> <p>Amend DG</p> |
| <p>Ms N Allman – Local Resident – Nortoft Lodge Barn</p> | <p>Para. 5.23 The Landscape Strategy which has been provided for the development of DIRFT proves to be totally insufficient with regard to adequate screening of the development during building and upon completion of the site for the residents affected by the development. I refer to fig 2 where landscaping has been allocated for</p> | <p>Fig.2 is illustrative of a potential layout and was submitted as part of the planning application. Development may therefore not take place to this specific layout. The figure also does not provide the level of landscaping detail that will be</p> | <p>Amend DG</p> |

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| | <p>around and in between the units, where in actual fact no screening or landscaping has been illustrated for Unit 1 and 2, south of the development where residents are affected. Furthermore, I refer to photographs 1 – 13, where at no time is there any reference or proposed images for the screening being provided at Nortoft Lodge Barn. Landscaping of the development is crucial to the South of the development for these residents to mitigate the noise and the visual impact that these units will bring.</p> <p>It was stated at the J18 forum on the 8th September that DIRFT had made available £40,000 to Daventry District Council for landscaping on land outside the development not owned by DIRFT in order to provide shielding. As the residents we feel this sum is grossly inadequate given the length of the boundary and the proposed size of Units 1 and 2 (see fig 2). Bearing in mind we have received no other form of compensation we feel this sum is inadequate and should be negotiated and agreed directly with the residents of Nortoft Lane. Further schedules of screening</p> | <p>required when a Developer submits their future detailed planning application or approval for reserved matters. The photos indicate what type of landscaping already exists or species that are proposed to be incorporated in any future schemes. Support need for landscaping to the south. However, it should be highlighted that any planting proposals should not compromise operations or security of the railway. DG to be amended para. 4.10 at the end to include “in short and distant views, including those from neighbouring properties”.</p> <p>S106 money has been set aside for off-site landscape works and based on DDC experience, it is felt that this sum is adequate. As the S106 has already been agreed as part of the planning permission, it cannot be changed. The S106 funding can be used for any landscaping that the Local Authority identify and subject to landowner agreement. S106 funds could therefore be agreed potentially in this</p> | <p>None</p> |
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| | <p>activity for the residential areas should be added.</p> <p>Para. 3.7 While the height of the proposed buildings are to mirror the Tibbett & Britten phase 1 building, this height needs to be re-inforced that this height will not be exceeded on Unit 1 due to the close proximity of residents.</p> <p>As with the previous development television transmission signals are affected and provision of additional aerials may be required.</p> <p>Para. 5.10 The external lighting needs to be improved on Unit 1 for considering of the residents at Nortoft Lodge Barn. Reflective light should be reduced – further suggestions should be provided directly to the residents.</p> | <p>location. As mentioned above, it should be highlighted that any planting proposals should not compromise operations or security of the railway. The Local Authority will need to identify this when Developers seek planning permission i.e once detailed layouts are put forward.</p> <p>Height limits are specified and Developers will be required to meet these requirements.</p> <p>The DG should be amended to highlight this to Developers as a potential issue that will require addressing. S106 funds may be used to rectify any problems.</p> <p>Lighting restrictions are set out in the DG. Local residents will have an opportunity to comment on any proposals as part of the Developers planning application. DG to be amended to highlight proximity of local residents generally.</p> | <p>None</p> <p>Amend DG</p> <p>Amend DG</p> |
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| | <p>Para. 6.4 Reinforcement of the planning conditions need to be made (para. 6.2) detailing hours of construction and the method of disposal of material bearing in mind Unit 1 is opposite residential property, the residents of the property do not want their privacy affected by the construction.</p> | <p>The finer planning details e.g what hours and methods of construction will be applied at the more detailed planning permission stage.</p> | <p>None</p> |
| <p>T and C Dougan, M and H Cheney, J and M Browne – Residents of Kilsby</p> | <p>Para. 3.6 – 3.8 maximum height is unclear and reference to Ordnance Datum Para. 4.6 confuses further. Commitment to maintain existing skyline is useful but the references to 137m AOD and reference to Tibbett and Britten does not give a clear idea of potential impact on views from Kilsby. Could the DG include the absolute heights of the T & B building (and Tesco Cold Storage building in the north of the site)?</p> <p>Commitment to landscaping is welcomed as is provision of sustainable transport and access – need detailed underpinning of what will actually be done by developers when they submit plans and this needs to be set out in DG.</p> <p>Restrictions to ensure units can only be let on basis that rail will be used should be part of planning conditions – believe existing occupiers have not used rail links</p> | <p>The heights have already been set through the planning condition attached to the Outline Planning Permission. The DG should be amended to provide a plan showing clearly which buildings are being referred to and what areas the height applies to.</p> <p>Developers will be required to submit landscape and transport details/information at time of application. What is required cannot be pre-empted until it is known what the Developer is proposing to do i.e danger of underspecifying what is required at this stage.</p> <p>This is promoted through the Outline Planning Permission and details attached to it.</p> | <p>Amend DG</p> <p>None</p> <p>None</p> |

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| | <p>to extent originally envisaged and increase in freight on local roads if this is not tightly controlled in respect of new development could be disastrous.</p> <p>Para. 5.2 Need clarity re – not clear that 10% landscaping condition relates to rail-served units, where up to 65% of site can be covered with buildings.</p> <p>Para. 5.21 Refers to HGV routing strategy – not aware of what this is but urge opportunity to direct HGVs away from A361 – already carries heavy load of freight traffic and could not safely cope with more. Wish to see DG barring DIRFT construction traffic into Kilsby, as was done during initial development of site and of freight travelling through centre of village.</p> <p>Para. 5.23 – 5.28 Welcome general approach to landscaping but wish emphasize need to ensure screening to</p> | <p>Amend DG to clarify.</p> <p>The S106 attached to the planning permission requires DIRFT Ltd to use all reasonable endeavours to ensure that construction and commercial vehicles observe the Recommended and Restricted Map, which was prepared in consultation with Northamptonshire Highways. This Map, attached to the S106, in summary highlights M1 and trunk roads as the transport routes and is to be attached to the DG. For information, NCC have also carried out a survey of HGV traffic on the A361 and advise that traffic relating to DIRFT is minimal.</p> <p>The S106 funding can be used for any off-site landscaping that the Local Authority identify and</p> | <p>Amend DG</p> <p>Amend DG</p> <p>None</p> |
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| | <p>mitigate/eliminate adverse impact on amenity of Kilsby. Existing development is screened to a large extent by rising ridge in landscape – will not be the case for DIRFT 2 – need earth or vegetation screen.</p> <p>Annex 5 Pleased to see restrictions in paras. 3.1 – 3.2 re- light pollution, but point out very considerable pollution from existing DIRFT – need to be carefully monitored and controlled.</p> <p>Hope planning conditions will require commitment of developers to make sufficient funding for landscaping to reduce adverse impact on local community. Hope invest in community in terms of provision of cyclepaths etc to offset adverse effect.</p> <p>Tight monitoring needed to ensure developers adhere to DG and robust safeguards/sanctions to ensure breaches identified and dealt with.</p> | <p>subject to landowner agreement. S106 funds could therefore be agreed potentially in this location. The Local Authority will need to identify this, as appropriate, when Developers seek planning permission i.e once detailed layouts are put forward.</p> <p>Confirm that any lighting will need to be kept under review.</p> <p>Funds for landscaping have been established through the Outline Planning Permission. Discussion will take place with relevant authorities in due course to discuss what public transport, pedestrian, cycle access projects take priority for funding from S106.</p> <p>The Case Officer and Enforcement Officer will need to ensure that any breaches are dealt with appropriately.</p> | <p>None</p> <p>None</p> <p>None</p> |
| Junction 18 Liaison Forum | General Point – The need for future maintenance on site needs to be clearly highlighted. | DG highlights maintenance, however this point to be strengthened. | Amend DG |

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| | <p>Section 5 Evergreen trees were suggested for landscaping treatment. In addition, one member suggested leylandii. Wildflower planting was also suggested.</p> <p>Para. 5.2 With reference to the higher density of 65% - clarification needs to be given that landscaping will still remain at 10% even if density is increased.</p> <p>Para. 5.6 Carbon Trust reference – details about the Carbon Trust could be provided as a footnote.</p> <p>Para. 5.6 Environmental Health to be asked whether any further clarifying guidance can be provided re- noise impact.</p> | <p>Confirm DG identifies that evergreens can assist in landscaping – DG to be amended to state that evergreen use should be kept to a minimum and should be mixed in with native species, which are the preferred species type i.e blocks of evergreens would not be acceptable as they are visually intrusive. Leylandii are non-native and are visually intrusive – they would not be acceptable. DG to be amended to promote incorporation of wildflower planting within all areas.</p> <p>Amend DG to provide clarity.</p> <p>Amend DG as suggested.</p> <p>Environmental Health advise that this issue will be picked up in detail through the detailed planning application stage, however DG to be amended to strengthen this section i.e</p> | <p>Amend DG</p> <p>Amend DG</p> <p>Amend DG</p> <p>Amend DG</p> |
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| | <p>Para. 5.8 Some members of the Forum felt that other colours of material for buildings may be more appropriate – reference was made to green i.e more of a field-landscape colour.</p> | <p>rather than “opportunities” – need to ensure that noise, visual etc impacts are kept to the minimum practically possible.</p> <p>Pale colours are felt to blend more into the landscape/skyline views. However, the DG should be amended to require developers to consider the visual impact of roofs and if appropriate, the developer shall incorporate a darker roof colour in a shade of green to be agreed with the LPA. When looking down onto flat roofs from above in longer views, in particular, a darker roof colour could blend better into the landscape. DDC Energy Officer and Building Control confirm that colour will not adversely impact on energy performance of buildings.</p> | <p>Amend DG</p> |
| | <p>Annex 5 Task Lighting – more information/details should be provided here, rather than just cross-referencing to publications. In particular, concern was raised re- ensuring the intensity of lighting is specified clearly.</p> | <p>The Lighting Consultant advises that the DG cross-references to the publications, as the DG would become too lengthy and unwieldy if all of the different lighting scenarios and hence guidance set out in these publications were</p> | <p>Amend DG</p> |

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| | | repeated. The DG to be amended therefore to briefly highlight the type of content covered by them. | |
| Senior Planning Officer, Daventry District Council | <p>That any developers making proposals adjacent to the railway shall submit detailed plans including foundations, fencing, altered ground levels and drainage requirements to ensure railway is adequately safeguarded. All drainage works adjacent to the railway should be connected to the main drainage sewer system. Buildings should be set back to ensure that they are sufficiently clear of Network Rail's boundary to avoid need for entry onto land for construction or maintenance purposes.</p> <p>Any trees to be located to ensure that they do not provide a means of access on to the railway e.g by overhanging branches etc. Also, if deciduous trees are planted, they should be set well back from the railway boundary to prevent operating difficulties caused by fallen leaves.</p> <p>Additional or upgraded security fencing may be required adjacent to the railway.</p> <p>The use of red or green lighting shall be avoided and any white lights shall face away from the railway to avoid dazzling of train drivers or confusion with signals.</p> | Amend DG as per all comments. | Amend DG |

Appendix D

Daventry International Rail Freight Terminal Expansion Design Guide

Responses To Sustainability Appraisal Consultation Draft

The table below sets out a summary of responses received. It should be noted that the four Statutory Consultees are also consulted at the Scoping Stage i.e which takes place prior to the publication of the Sustainability Appraisal (Consultation Draft) (SA-CD) and that any comments at that stage were fed into the preparation of the SA-CD. It should be noted that no comments were received to the Consultation Draft from English Nature or English Heritage (who are the other two Statutory Consultees), however comments were received from them during the Scoping Stage.

Respondees List

1. East Midlands Regional Assembly
2. Environment Agency
3. Countryside Agency (Landscape, Access and Recreation Division)
4. Daventry Villages Together
5. Northamptonshire County Council (Built and Natural Environment Team)
6. STOP (The Over-Development of Northamptonshire)

Abbreviations

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| DIRFT | = Daventry International Rail Freight Terminal |
| DG | = Design Guide |
| DDC | = Daventry District Council |
| RSS | = Regional Spatial Strategy |

| Respondee | Summary of Comment | Response | Changes to SA and/ or CS |
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| STATUTORY CONSULTEES | | | |
| Environment Agency | <p>Including DG comments made would contribute to objectives B4, H1, C2, C3, and H2 respectively.</p> <p>Include an objective to improve water quality.</p> | <p>Amend SA to refer to these changes.</p> <p>Amend SA to take this on board.</p> | <p>Change SA</p> <p>Change SA</p> |
| Countryside Agency (Landscape, Access and Recreation Division) | <p>Pleased to note that the desirable direction of change for landscape character has been noted as maintaining and enhancing the quality and character of the landscape.</p> <p>In the section on Sustainability Objectives we particularly support the following comments: A2 - that cycling/walking is encouraged by the provision of internal routes linking to the external network; B5 - that landscape requirements aim to provide a soft edge to the development; C1 - that the landscape strategy has regard to the surrounding character of the site; E1 and E2 which explains that the SDP establishes the primary landscape character for the site.</p> <p>In the Sustainability Appraisal Scoping Report Comments we are pleased to note</p> | Points noted and welcomed. | None |

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| | that most of the Countryside Agency's comments have either been taken on board or been given adequate explanation. | | |
| OTHER COMMENTS | | | |
| Daventry Villages Together | SA does not mention relation to LDF, RPG, MKSM Spatial Strategy or terms of reference for WNDC. | SA to be amended to briefly highlight relationship to other key relevant policy plans. It should be noted that the terms of reference of WNDC are not relevant, as WNDC do not have planning policy powers. | Change SA |
| East Midlands Regional Assembly | May refer to RSS8 Policy 1 (Regional Policy Objectives) | Point noted | Change SA |
| Northamptonshire County Council – Built and Natural Environment Team | <p>It does not appear that other planning policies and plans have been reviewed, or that this has been used to inform the development of SA objectives.</p> <p>Wish to see the Northamptonshire Landscape Character Assessment used as a baseline that established the primary landscape character as the basis on which to develop individual plot landscaping. This would require the impact to be reassessed against this new baseline.</p> <p>Welcome sustainability objective E2 to recognise the Landscape Character Assessment, and its role in informing mitigation measures. It could therefore be modified to <i>'seek to maintain and enhance the existing landscape character through</i></p> | <p>SA to be amended to briefly highlight relationship to other key relevant policy plans.</p> <p>SA to consider this work.</p> <p>SA to be amended to highlight this.</p> | <p>Change SA</p> <p>Change SA</p> <p>Change SA</p> |

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| | <p><i>mitigation measures such as screening and new landscaping proposals, as informed by the Northamptonshire Environmental Character Assessment.'</i></p> <p>Para. 6.7 notes that no significant adverse impacts on the environment are identified as part of the Sustainability Appraisal of the design guide that would require mitigation measures to be put in place. However, the SA notes a marginal negative impact on landscape, and various planning policies indicate that negative impacts require mitigation. The Milton Keynes and South Midland Sub-Regional Strategy includes an objective to <i>'ensure that development contributes to an improved environment, by requiring high standards of design and sustainable construction, protecting and enhancing environmental assets (including landscape and biodiversity) and providing green space and related infrastructure.</i> Policy AR2 of the Northamptonshire Structure Plan notes that <i>'the landscape character of the whole county will be conserved and enhanced. ... Development proposals will respect the local character and distinctiveness of the landscape.'</i></p> <p>Thus it is not the case that mitigation measures will not be required if no significant adverse impacts on the environment are identified; there are planning policies that require development to contribute to an improved environment,</p> | <p>This issue needs to be further clarified in the SA and the SA amended as appropriate to highlight what mitigation is to be put in place.</p> | <p>Change SA, as appropriate</p> |
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| | <p>and that landscape character is conserved and enhanced. Therefore mitigation measures may be required so that the development is compliant with these policies. Similarly, should the impact on biodiversity be reassessed as negative, there are policies that require maintaining, enhancing, restoring or adding to biodiversity conservation interests (PPS 9; Biodiversity and Geological Conservation).</p> <p>Objectives for the Regional Spatial Strategy adopt the principle of no net loss of priority habitats and wherever possible managing and developing habitats so as to enhance biodiversity within the region. The assessment of the impact of the development on biodiversity implies that there will be a net gain as a result of the development, and a marginal positive effect is registered. While this may be the case, the assessment is not supported by evidence on the quality of the biodiversity resource before development, or evidence on how the mitigation and enhancement proposals would deliver a benefit over and above the impact of the loss of the previously existing biodiversity. We consider that until this evidence base is shown, it is inappropriate to assess the effect of the development as marginally positive. If an assessment of the current, pre development resource has not been made, this should be carried out, and the</p> | <p>An EIA was carried out as part of the outline planning permission – evidence is based on research carried out for this document. SA to be revised to x-reference to EIA report and provide examples of mitigation/enhancement measures.</p> | <p>Change SA, as appropriate</p> |
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| | impacts on biodiversity reassessed. | | |
| STOP (The Over-Development of Northamptonshire | <p>Table 1 How will DIRFT assist advanced manufacturing and exports? Have any manufacturers moved to DIRFT? What proportion of goods moving through DIRFT are imports, what exports?</p> <p>Table 3 Does building huge warehouses on green fields respect existing landscape character?</p> <p>Table 3 How many jobs has DIRFT created to date, and what are envisaged by the expansion? How many of these are filled by people living within 10 miles? What is the current number of jobs created per green acre developed? Does DDC consider this a good deal?</p> <p>Table 3 What proportion of container movements are (a) rail to rail (b) rail to road (c) road to road?</p> <p>The Draft extols the benefits of DIRFT's location but makes no mention of alternatives. Why is consideration not given to providing such a facility on brownfield land in, say, Birmingham or Coventry?</p> <p>Does DDC consider this will be the end of DIRFT's expansion – or does it subscribe to the view that one thing leads to another,</p> | The DG deals with the design issues of the DIRFT Expansion, not the principles of DIRFT being established. These comments all relate to the later and are therefore not applicable to the SA of the DG. | None |

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| | <p>that the presence of motorway and DIRFT mean there will be no end to loss of greenfield land in the future?</p> <p>Finally, would DDC please tell us why it refused to answer similar questions before the House of Lords enquiry into the Urban Development Corporation last year (and you will be aware that by UDC rules DIRFT is relevant to the UDC)?</p> | | |
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