

Key objections in this section:

- Multiple, problematic errors relating to the road layout adjacent to the site and issues over the height of buildings
- Transport /travel policy that does not meet NNC JCS Policy 13.
- Issues of pedestrian safety – there is no crossing or bridge planned for the A6 or any other junction used by pedestrians and cyclists
- Bus stops are located outside of the NNC 400m requirement.

5. Local objections to the plans and public consultation not fit for purpose

Harworth's Statement of Community Involvement reveals the strength of feeling against the Nunnery Farm site development. It should also be reflected that since Harworth published this document public meetings, Facebook engagement and Rothwell Town Council have all raised the profile and opposition to the Harworth proposals.

Harworth claim in their Statement of Community Involvement, *'By hosting the event [Community pop-up] at the Sports Centre it ensured that we were also able to reach beyond the self-selecting audience that typically engage in planning consultations and speak with those already using the facilities.'* (p8). However, it should be reflected the event was held in the entrance hallway of the Montsaye Academy 6th form block, not in what one might imagine when describing a 'sports centre'. Although the small community gym and a dance studio are located in this building the space used by Harworth was the corridor area, relatively small, and not fit for purpose for a meeting of such importance. This resulted in a number of people not being able to access the community pop-up.

Additionally, the questions circulated in an online survey by Harworth were worded in such to elicit a positive response, and did not provide respondents with enough information and data to answer questions in an informed way. For instance, respondents were not informed that if the plan goes ahead it will take 30 years before there will be a net-gain in biodiversity, and only then if the site is monitored and maintained. Such a dubious approach to collecting feedback is both unprincipled and bad practice. It should also be noted that despite the comments in the conclusion of the Statement of Community Involvement it also appears that none of the feedback from their public consultation has fed into any other of Harworth's planning documents for the Nunnery Farm site.

Key objections from this section:

- Public engagement held in the corridor of Montsaye Academy was not fit for purpose
- Feedback questions did not present full information to those submitting responses
- Despite the above, 75% of respondents to the question 'how do you feel about them [Nunnery Farm site plans] at this stage?' (Harworth's Statement of Community Involvement p14) responded they were 'Strongly opposed'. Reflecting the strength of feeling against the planned development

6. Other material objections – Planning Inspectorate dismissals of relevant planning applications

The government's Planning Inspectorate has dismissed a number of planning applications at appeal with a direct relevance to the Nunnery Farm proposal. The judgements in these cases reflect similarities in issues to those expressed above. Three cases apply to large scale warehouse applications, the fourth is the rejection of the proposed expansion of Rothwell Truck Stop.

The four appeal decisions relate to:

3325211 Proposed warehouse site near Northampton (January 2024)

This application was dismissed as '*applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise*' (p 15, 90) As already noted in section 1 of this document the Nunnery Farm site is not indicated as an area for development, and to do so would go against the NNC plans.

3336295 Proposed warehouse site near Tamworth/Polesworth (June 2024)

The application was dismissed in part because '*the proposed development would have an adverse impact on the character and appearance of the surrounding area, would fail to maintain an effective Strategic Gap between Tamworth and Polesworth with Dordon, and as a result would have a clear and significant adverse impact on the distinctive character and identity of Polesworth with Dordon.*' (p37, 191). Although Nunnery Farm is not part of a Strategic Gap the land is open countryside, and as noted in section 2 it is important to both the character and appearance of the surrounding area.

3301468 Proposed warehouse site near Basingstoke (Dec 2022)

This application was dismissed, '*my findings on the degree of landscape and visual harm arising from the scheme reflect both the extent of ground works required and its scale and massing when set against the site's constraints.*' (p14, 112) As noted in section 2 of this document the scale, height and incongruous nature when set alongside the historic Market Town of Rothwell, in a landscape of open countryside, makes the Nunnery Farm site not fit for such large scale, out of character development.

3249963 Proposed extension and expansion of Rothwell Truckstop (Sept 2020)

This application was dismissed as, '*the appeal proposal would have a substantial harmful effect on the character and appearance of the area through the loss of open countryside.*' (P6, 34). As noted in section 2 of this document the protection of the landscape around Rothwell is essential to the character of both Rothwell and the surrounding villages. This all important issue was identified as a reason to dismiss this particular local planning proposal at Rothwell Truck Stop and should form a key part of the reason why the Nunnery Farm Application is refused.



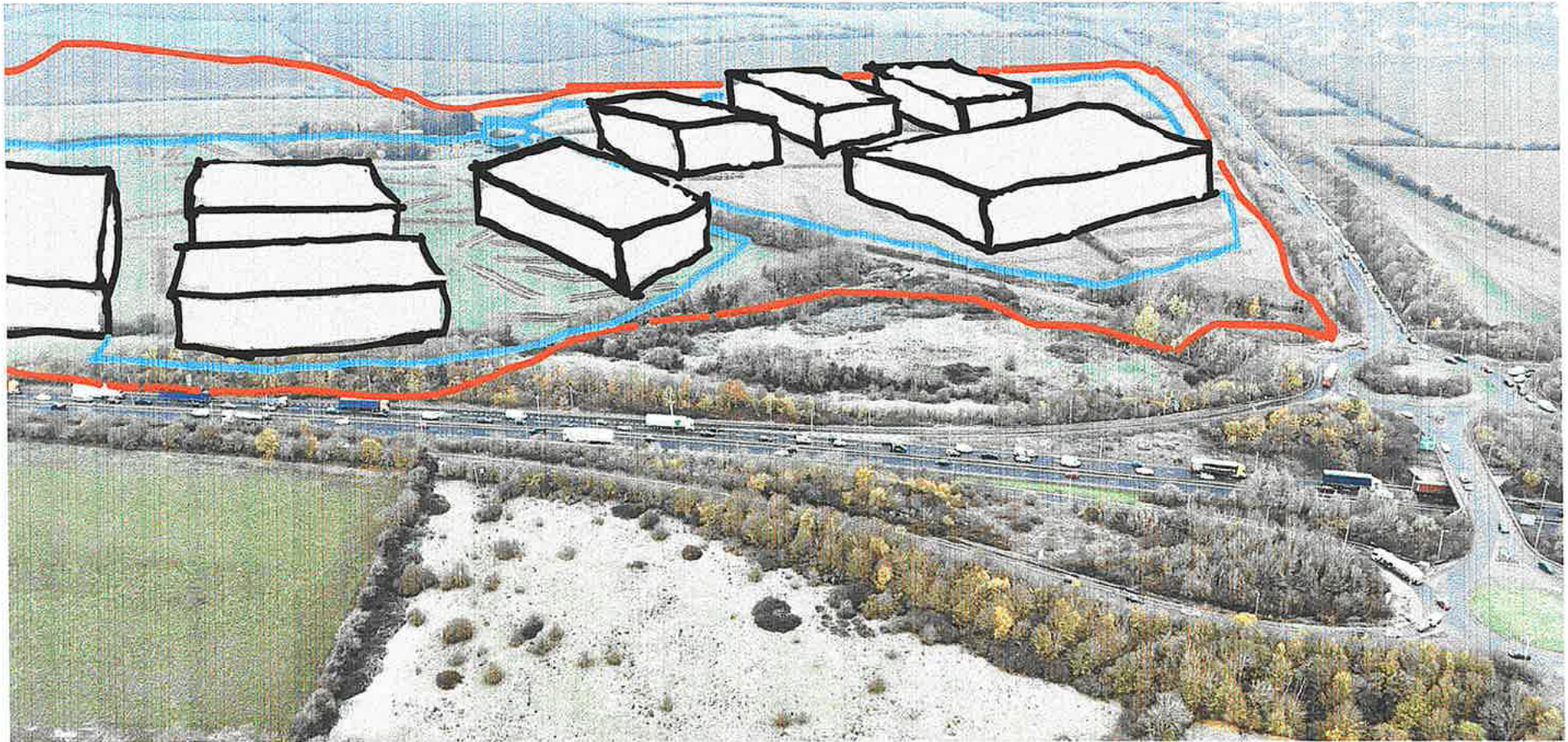
APPENDIX 3
STILL DRONE IMAGES AND 3D SKETCH REPRESENTATION



View looking north-west towards Rothwell from the corner of the site.



**Ariel view looking south east across the site
Buildings of the height proposed will be visible from multiple
vantage points**



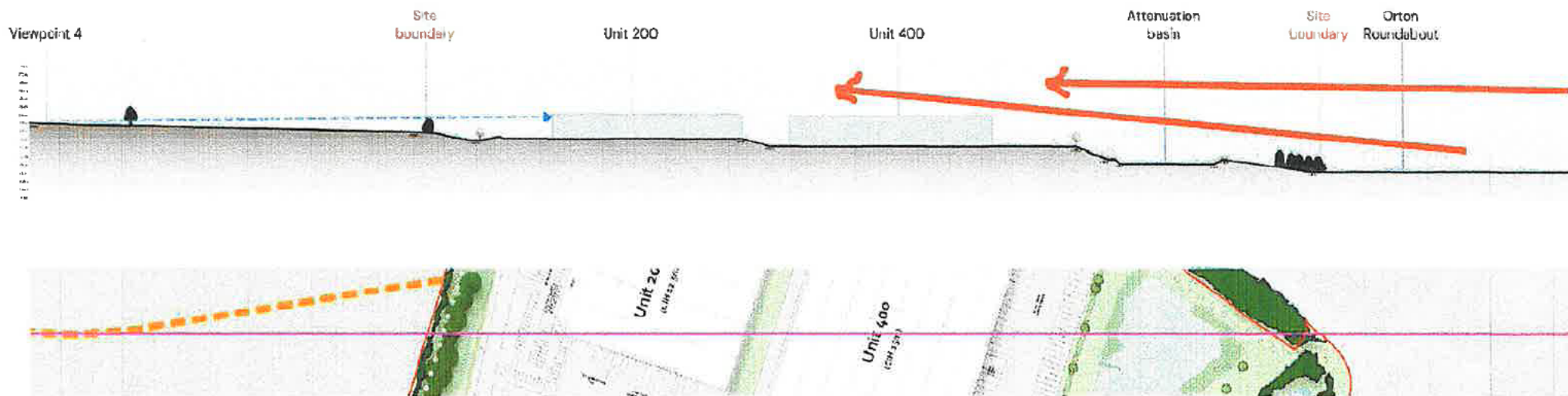
Sketch representation of the scale and massing of the development (looking west – A6 to the north)



View of site looking south east from the truck stop)



View looking south east with Rothwell to the west. Views of the site and buildings from Rothwell will be clearly seen



Section view from D&A Statement. The elevation of the site will result in views of the buildings from multiple angles in particular from Rothwell and Woodland Valley. This will include light pollution



APPENDIX 4 - FLOODING RISKS AND WATER MANAGEMENT

4.2 Planning Practice Guidance Update February 2024.

Planning Policy. National Framework (Updated December 23)

There are major concerns from residents as to the risk of flooding as water flows into Kettering causing houses to flood as on November 29th 2024, it flows onto the main roundabout, referred to as the Orton Roundabout by the developer.

Paragraph 165 of the NPPF states from areas of “inappropriate development in areas at risk of flooding should be avoided by directing development away if highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”

- The development is not necessary in this area as there is a great deal readily available warehousing space in North Northants as it is. Flood risks will be considerably higher with run of from fields, buildings, road way around the proposed development ending up flooding houses via the Slade brook in Kettering.

Paragraph 167 of the NPPF states “All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property.

- Harworth’s Warehousing planning application will **not** meet the above requirement as previously stated it will cause major flooding down stream.

Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more suitable locations.”

Paragraph 173 of the NPPF states “when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

- This needs to be taken very seriously as it is well known that it will cause flooding. See Paragraph 165 and 167 and previous comment re flood water contributing to Kettering flooding on 29th November 20204.

Local Flood Risk Management

Development should contribute towards reducing the risk of flooding.

4.5 Kettering Borough Council Strategic Flood Risk Assessment Level 1 Main Report

The Kettering Strategic Flood Risk Assessment (SFRA) assesses the risk to the Kettering Borough from flooding from all sources, now and in the future, taking into account the impacts of climate change, and to assess the impact the land use changes and development in the area will have on flood risk.

The SFRA forms a key part of the evidence base to help inform the Kettering Local Plan. The aims of the Level 1 SFRA are to:

» Provide a sound evidence base for site allocation purposes;

The following flood resilience measures could be considered to improve the resilience of the proposed development in case of a flood event:

**» Self-closing airbricks and service vent cover or seals; » Plant installed on an upper floor;
» Waterproof flooring, resilient plaster on wall and washable paint;**

- The above comment suggests the Kettering Local Plan should be refusing this application for Warehousing having highlighted their concerns re flooding potential in Kettering. The brook in the Warehousing site feeds into the Slade brook that travels all the way into Kettering contributing to the flooding of houses!

*Given the above mitigation measures are implemented, the site is considered to be at low risk from surface water flooding. The site is not considered to be at risk from other sources of flooding. Access and egress to the site will be provided by Harrington Lane in the centre of the northern boundary of the site, which is connected to the A1 to the south. **Parts of Harrington Road is at risk of surface water flooding, with maximum flood depths of up to 600mm; it is recommended to move the point of access beyond the area of surface water flood risk.***

- Suggesting the mitigation measures above should be implemented to protect the warehousing is alarming when it would appear to suggest the Warehousing should take precedence over the safety of Kettering people in their homes. It was quite clear on 29/11/24 when people in Kettering were flooded out of their homes prevention of flooding should be a priority! There is no doubt that the development of this site will contribute to flooding downstream.

- It is interesting that 600mm – almost 2ft - is stated as a maximum depth of flooding in parts of Harrington Road without considering the length and width of the flood causing cars to fail to get through the water with possible damage. Smaller cars will struggle to get through, the water will flow down to Orton Roundabout and possibly on to the A14.

3.67 JCS strategy North Northamptonshire's groundwater is dominated by secondary aquifers, notably the Northampton sands formation although smaller areas which lie over the Lincolnshire Limestone are classified as a Principal aquifer are vulnerable to contaminants. These aquifers are capable of supporting water supplies at a local scale and support surface water features. The Environment Agency (EA) is the statutory body responsible for the management of groundwater resources. The EA has prepared guidance on groundwater protection 'Groundwater protection: principles and practice' which sets out its approach to the management and protection of groundwater.

- To be clear, the aquifer ground on this site is made up of topsoil, Northamptonshire sand, Whitby mud stone, soft soil, gravelly sand, limestone, and solid heavy grey clay, weak sand stone, the aquifer being the limestone and sand that can be of an average of 1.5 metres bgl. Should the aquifer be **obstructed in anyway this stops the water flowing**. The land is on a sloping site meaning the ground works would have a major devastating effect on drainage. As a result of levelling the ground, it will cause major damage to the ground waters/aquifers damming the ground waters, causing them to rise and possibly cause flooding in the local area as the ground waters flow from Harrington towards Rothwell and on to Kettering. Damming them up will **definitely cause** the level of the waters to rise, as happened when the A14 was built. **This was confirmed by the Environment Agency and is known in the area as ground waters can be 12ft down at one time and near the surface at another.**
- Ground constantly used by lorries when developed will cause the above.
- The ratio of 1 in a 100 risk of flooding no longer applies today, due to the accelerating effects of climate change, run off from increased housing stock, building over flood plains and failure to maintain waterways. As stated in NNC JCS Policy 5, item 3.63. " flood storage measures will be required.....and the upstream catchments of the Slade Brook and River Ise to enable future growth to be facilitated. These schemes include the Slade Brook flood storage reservoir at Glendon Hall". **No such schemes have yet been implemented**, leading to repeated flooding downstream including the area of Stratfield Way, Kettering, which was the subject of a Public meeting in January 2025 called by our local MP.

- NNC JCS, Policy 10 - Provision Of Infrastructure, item b. The proposed development goes against this Policy as it will increase the demand for infrastructure, due to it's proposed location, increased car use, require additional or expanded water and waste facilities and adversely affect existing environments. The waste water pumping facility at Rothwell is almost or at capacity with a further 1500 plus homes being built in Rothwell that will require this essential facility.
- The site for the proposed development has a brook fed by natural drainage and run off from adjacent fields, which feed the Slade Brook running south of the proposed development. The concreting over of the proposed site will have a serious impact on land drainage and increase the likelihood of downstream flooding. While a site drainage system is proposed we have no guarantee that the developer, the Environment Agency or Anglian Water will maintain this.
- Therefore, with recent flooding of the access roundabout to the proposed development and likely subsequent flooding of the A14, presents at least a danger to the public and a cost on the Public Purse.
- With the estimated 3,000 employees (considered excessive) to be accommodated on the site of the proposed development, multiple traffic movements and storage of a range of goods, contaminates in leakage, overflows and spillages will run off from the site into local waterways.
- While the developer says they will mitigate against spillages and overflows, we have no guarantee that as a speculative development, the developer will have any real day to day control/management over materials in transit, vehicle types, methods of storage, loading and off loading facilities.
- *Regardless of any mitigation proposed by the developer, any responsibility will be passed to the owners or tenants of each unit, resulting in any mitigation claims made in the application not being valid. When spillages or overflows occur the effect on these watercourses and habitat could be catastrophic.*



TRAFFIC ASSESSMENT (T. A)

THIS DOCUMENT FORMS PART OF THE ROTHWELL AGAINST WAREHOUSING (R.A.W.) LETTER OF OBJECTION. THE FORMAT OF THE LETTER WILL REFER TO THE SAME HEADINGS PARAGRAPH AND SUB PARAGRAPH NUMBERING AS THE DOCUMENT SUBMITTED BY HYDROCK CONSULTANTS LIMITED ON BEHALF OF HARWORTH ESTATES LIMITED. (the Applicant) WHERE THIS IS CONSIDERED NECESSARY. THE LETTER COMMENCES ON PAGE v.

FIGURES AND ASSOCIATED SECTIONS

1.1 Site Location. this photograph is referred to as it shows the A14 south of the proposed development site.

EXISTING CONDITIONS.

2.1 THE LOCAL HIGHWAY NETWORK. this photograph acknowledges that the A14 is included in this definition.

2.3. This photograph shows the Orton roundabout (viewed from the A6 near the Truck Stop not viewed from Harrington road.)

2.This section is out of date the roundabout has been constructed bearing right at the roundabout this leads into Stag Road and a new housing development constructed by Persimmon Homes. referred in section 7 – future base line conditions.

2.6 This photograph shows the existing condition of Harrington road leading east wards into the town of Rothwell.

2.8 Local Highway Network. this photograph identifies well the Harrington roundabout to the north, the A6 crossing the bridge over the A 14 and the Orton roundabout to the south . However, it does not show to any extent the Harrington road after it leaves the Harrington roundabout and passes eastwards through the residential areas on either side to the point where it joins the B 576 passing through the centre of Rothwell.

2.9.ACCIDENT DATA (and Table 2.1 Accident Data Summary)

Whilst the numbers are not great, there is an underlying trend over all. should this rise continue then the impact on Rothwell and the surrounding villages will impact locally as traffic diverts from the A14 when an accident occurs it is the imposition of traffic movement to and from the development site which has the potential to increase these the figures (further investigations are continuing by R.A.W.)

3. THIS SECTION REFERS TO THE NATIONAL PLANNING POLICY FRAMEWORK.

3.2.3. Paragraph 108 of the policy is referred to which states this paragraph seeks to encourage opportunities to promote walking, cycling, and the use of public transport. paragraph 109 is referred to which states the development should be focused in sustainable locations and offer a genuine choice of transport modes.

COMMENT : This it is submitted the application fails to achieve for reasons here after stated.

3.2.4.This states amongst other things the needs of people with disabilities and reduced mobility should also be addressed this is not addressed in the applicants submission.

3.2. 5.The section states the development should only be prevented or refused on highway grounds if there would be an unacceptable impact on the highway safety, or residual cumulative impacts on the road network would be severe.

COMMENT

Referring to the above it is **STRONGLY** felt that the development will in fact adversely impact on the ancient town of Rothwell ,and the villages of Harrington, Orton, and Thorpe Underwood.

3.2.6 It is stated priority should be given to walking, cycling, and public transport movements; conflicts between vehicles and vulnerable road users should be minimised through effective layout design.

COMMENT: To this end the submission fails in its objectives.

3.4 MANUAL FOR STREETS [M FS]

3.4.2 The manual deals with principles of what a street is for. it outlines five principal functions namely.

1 Place

2 Movement

3 Access

4 Parking,

5 Drainage and Utilities

3.4.3 A sense of place encompasses a number of characterises, namely local distinctiveness, visual quality and human interaction of the five functions, place and movement are the most important in determining character of streets and should be considered together as opposed to in isolation.

COMMENT: It is felt when applying the above this type of warehouse development fails to satisfy the objectives laid down when applied to the ancient town of Rothwell and the surrounding villages.

TABLE 3.1 USER HIERARCHY TAKEN FROM TABLE 3.2 OF M.F.S MARCH 2007.

This table refers to consideration being given to cyclists, Public Transport users and specialist service vehicles.

TABLE 3.2 ACCEPTABLE WALKING DISTANCES .

The issues referred to in the above and table will be specifically addressed hereafter.

3.6. 3. POLICY 2- CREATING A LASTING MODEL SHIFT.

3.6.4. The object of this policy is to secure sustainable development, the Council and it's partners will support the introduction of effective and attractive sustainable transport options that will encourage lasting model shift in Northamptonshire. To ensure this; two set targets for model shift were set with the aim of achieving by 2031:

> A reduction of 5% in single occupancy car journeys to work from the existing built up areas of the towns;

> A reduction of 20% in single occupancy car journeys to work from new developments .

COMMENT: It is suggested by virtue of the location of the development site in this rural setting this will would be difficult to achieve in reality.

3.6.5. New developments provide the greatest scope for achieving model shift because it is possible to design appropriate measures from the start, a figure of 20% does not seem unreasonable for the larger developments in bigger towns. It is much more difficult to achieve the same scale of Change in existing areas, and a 5% target has been set there. Again this figure is felt appropriate for the larger towns. In practice, there will be a wider variation both in the scale of the development proposals and the sizes of towns and villages affected. To apply model shift

targets to individual developments., appropriate targets will need to be determined on a site -by -site basis.

COMMENT. While this objective is desirable the percentage of 5% could be difficult to achieve due to the location of the development, and the nature of its intended user - warehousing.

3.6.6. To achieve these targets and reduce carbon dioxide emissions quality alternatives to the private car need to be available and should be supported by effective promotional campaigns to encourage their use. Initiatives in the plan include rapid transport networks, smart ticketing, marketing, travel centres and ultra low carbon vehicles. The Transportation Plan recognises the need for the transport network to be resilient to future climate change that may occur over the life of the network. The strategy also recognises the role that the network could play in helping to build a natural environment to cope with climate change

COMMENT. While the objectives of the policy are understood and applied to private cars it is perhaps not inappropriate to mention the amount of carbon dioxide emissions which will be brought to the development and also nearby residential homes and their occupants by diesel lorries. (H.G.V's) This development will not play a part in helping to build a natural environment to cope with climate change. In fact it could be said that the effect of the development would do exactly the opposite to the locality.

3.6.7. Strategic Policy 3 – Connecting New Developments to the Existing Transport Network.

3.6.8 The Council understands that connectivity has a vital role to play in getting people to work and to services such as education and health as well as to leisure facilities and retail. For the new developments in Northamptonshire to become active, safe and sustainable, it is essential for communities to be contributing to the local economy and are well connected to the existing transport network by both roads and more sustainable transport modes

COMMENT: Bearing in mind the nature of this particular development it is not thought that it will achieve the aims expressed in this policy in a significant way due to the intended user and the fact the developed site will not be connected in a manner which could be described as satisfactory with sustainable transport modes as will be commented on hereafter.

3.6.9. The Council will ensure that all new developments are well connected by public transport and walking, cycling, and motor vehicles routes, to the existing net work or one that can be reasonably expected to be created - this will allow ease of movement between the development and existing built up areas and provide access to employment and key services.

COMMENT: While the Applicants have attempted to address this policy it is not considered that this has been achieved in a meaningful way and further comment will ensue at 4 Accessibility

3.7.2 ' The aim fit for purpose' means creating a network that delivers exactly what Northamptonshire needs to be able to function plus what it needs to be able to grow no more and no less. This overreaching aim can then be broken down into six objectives that have been chosen to guide this Transport Plan. These objectives have been drawn up to reflect the issues which have been identified as locally important through consultation, while at the same time reflecting wider national and local policy context. These objectives have been deliberately chosen to reflect the main impacts that transport can have on the wider community, rather than being

linked to particular schemes or measures. They form the basis upon which the policies and programmes contained in this Plan have been developed.

3.7.3 The objectives of the L PT are:

1. Fit for the future – Creating a transport system that supports and encourages growth and plans for the future impacts of growth while successfully providing benefits for the County.

COMMENT: It is not felt that the scheme which merely carries out accommodation work along the Harrington Road westwards towards Harrington achieves what is required under this heading. It does not benefit the County, but only access to the development site

2. Fit for community- Through the transport system help to maintain and create safe, successful, strong, cohesive and sustainable communities where people are actively involved in the shaping the places where they live.

COMMENT: Limited :Public Consultation has been held with the Community a large majority of which do not wish to see the warehousing development go ahead.

3. Fit to choose – Ensuring that the people of Northamptonshire have the information and the options available to them to be able to choose from the best form of transport for each journey they make.

COMMENT. For reasons explained in Section 4 it will become apparent that if this development goes ahead the main vehicle of choice will of necessity be the motor car due to the location of the site, as a result of the non-existent public services available to and from the site.

4. Fit for economic growth. - Creating a transport system that supports economic growth regeneration and a thriving local economy and successfully provides for population and business growth.

COMMENT It is suggested that the development will fail in the objectives referred to. The affect of this development and the subsequent movement of traffic to and from the site could well have an opposite effect on other businesses in the locality due to an overload of the transport system brought about by the the movement of vehicles to and from the site. It is reasonable perhaps to presume that further vehicle movement in the locality and on the A14 could effect the speed with which they conduct their business operations.

5. Fit for the environment. To deliver a transport system that minimises and wherever possible reduces the effect of travel on the built, natural and historic environment.

COMMENT: In this respect the development fails in its entirety the ancient historic Town of Rothwell by bringing H. G. Vs and Cars into the Town causing a loss of Amenity, Pollution, Noise, and further wear and tear on the roads serving the Town. Potholes etc the cost of which will be met by the Tax payer.

6. Fit for best value. Being clear about our priorities for investment and focusing on value for money by prioritising what we spend money on and how it can be beneficial for the County as a whole and search for alternative sources of funding.

COMMENT. It is not believed that the development will significantly meet the aims of this stated policy and it will not it is suggested be beneficial to the County as a whole but will merely add further problems to the transport network in the vicinity of the site, and further what can perhaps be reasonably foreseen is that a new roundabout with associated works will only result in further accumulations of traffic and add to the repair requirements of the highway authority

3.8. Northamptonshire Parking Standards. As this section relates to the assessment of parking within the site of the development little needs to be said, save the fact the

whole of the development will destroy natural habitat and irreplaceable open country side.

4. ACCESSIBILITY.

4.1.4 The Manual for Streets emphasises that “ walkable neighbourhoods should have a range of facilities available within 800m”.

It is most unlikely that employees at the warehousing site will be able to avail themselves of those within the town which could be considered an amenity due to the fact they will be required to walk a distance greater than this to visit the nearest corner shop.

4.1.6 On their own admission the Applicants acknowledge pedestrian accessibility to the site is limited. Reference here in is made to the village (presumably the Applicant means the Town)

4.1.7 This section refers to Figure 4.1 2 km Walking Catchment.

The intended footpath improvements would only appear to facilitate foot access to and from the development site westwards along the Harrington Road from the Harrington roundabout. Access on foot to the site along the A6 from the north to the Harrington roundabout will not be possible. There are no footpaths along Harrington Road west of the roundabout this is a country road again with no footpaths. It is considered it is not a particularly safe route for walking to the site and neither is the road leading down from Orton, this is a rural area with Class C roads and no footpaths. The only road which could perhaps be considered safe is the Harrington Road east into Rothwell which does have a walkable path (s). The problem with this is whether you are walking west from Rothwell or east into the town from the development site it is necessary to cross the A6 Road where it meets the Harrington roundabout which due to traffic flows could at the best of times be perhaps considered a hazard

4.1.9 The Applicant states “At present the site currently experiences a number of barriers to accessibility on foot “ and continues by stating “ the proposals will include infrastructure improvement works along Harrington Road which will improve the pedestrian environment for pedestrians which provides the potential for new employees to access the site on foot” In reality the proposals do not achieve this because such improvements will only be made from the Harrington Roundabout to the new Roundabout and into the site.

4.1.10. A detailed list of some local amenities within 2km are given. However R.A.W show the round trip figures as opposed to the Applicants single one-way figure.

> Welcome Break Truck Stop. - A14 – 800 km this is acknowledged to be possible, but not ideal due to traffic movements in the vicinity

> Ken Sing Chinese Takeaway.-2.4 km(Not really an option for employees due to opening hours)

> Holy Trinity Church.(2.6 km) Mostly locked during the week but all welcome on Sundays.

>Nationwide. (2.6km) While there is an ATM is it likely employees will make this journey on foot.

> The Red Lion Pub. (3 km) Probably not a likely option visiting on foot.

> Jesus Hospital.(3.2 km) This building is not a hospital the name is historical. It now comprises residential accommodation.

> Tesco Express(3.4 km) The round trip figure calls into question if or how often this facility would be used.

> Montsaye Academy School.(3.4) This is not thought to be a facility required by employees at the warehouse. However, it is worth noting the School connects directly via Greening Road to Harrington Road used by students and vehicles attending and visiting the School.

COMMENT:

Considering the list above, with the exception of the Truck Stop .the reminder would probably be more applicable if applied to a residential development and not employees at the warehousing facility bearing in mind its proximity to the town centre.

4.1.11 While the site is accessible on foot to the centre of the town it is felt unlikely employees would wish to avail themselves of those which are appropriate due to time constraints during the working day and the practicalities of such a journey on foot. The Statement “ with the connectivity enhanced once the proposed improvements to Harrington are made.” is irrelevant. Harrington is to the west and in the other direction to the centre of Rothwell.

4.2 3 This section refers to Rothwell and Longport? Longport does not exist locally and it is assumed it is Lamport that is referred to.

4.2. 4 This section states the site currently experiences a number of barriers to accessibility That is not disputed particularly as the improvement would only be carried out in close proximity to the site between the Harrington Road roundabout, the new roundabout, and access into the site.

4.3.3. and 4.3.4. While the number of buses passing through Rothwell is given it is not thought this will be an attractive method of reaching the development site. The Applicant acknowledges it would mean travelling double the 800M recommended walking distance. Faced with the prospect of travelling to the development site in this manner ie Bus and Walk it is considered to be somewhat unlikely, and an unattractive option, particularly in the winter months.It will not encourage single car occupancy.

4.4. 1 Access by Rail.

Kettering Station and Market Harborough Station are mentioned with distances given in relation to the development site. It is not seen as a likely option for a prospective employee. There is no direct bus service from the station to the development site and due to the nature of the roads leading from Kettering Srtation to the development site, in the main this could not be said to be a safe and attractive journey. While there are train services to London and the other locations mentioned, bearing in mind the intended use of warehousing it is questionable just how many employees would be travelling to the proposed development via Kettering Railway Station.

4.2.5. to 4.3. 2 It seems unnecessary to deal with these sections in isolation, as the points it is felt have been addressed above.

4.5 Access by Public Transport. It is felt there is no need to comment on the 60 minute Public Transport Plan.

4.6. Conclusions.

4.6.1 and 4.6.2.

The Applicant acknowledges that the site experiences some barriers by active travel. It is suggested that the infrastructure improvements on the Harrington Road by the installation of a new roundabout, foot paths etc will only enhance the journey to work within the immediate vicinity of the site and goes no further.

It is submitted that the only benefit arising from the works will be for the occupiers and users of the site and not the wider community.

5. PROPOSED DEVELOPMENT. It is not not felt necessary to comment.

6. TRIP GENERATION, DISTRIBUTION AND ASSIGNMENT.

The data shown within this section is of particular concern.

6.2.6. It is stated“ it can be seen(from the table referred to therein) that the development is expected to generate the following two way Total PUC trips;

> 516 in the morning peak and

> 441 in the evening peak

It is pointed out that these figures only relate to morning and evening peak times. No account is taken of the effect these vehicle movements are likely to have outside of the morning and evening peak times.

Concerns grow when it is considered that this type of development can be a 24 hour operation and the possible effects that vehicle trips will have on the local residential community.

> Referring to the statistics shown in columns relating to B2= 85,000 sqm, B8 =85,000 sqm and B2 -170,000 sqm

It is further apparent (from the table referred to therein) that the development is expected to generate the following two-way TOTAL HGV trips :

>82 arrivals and departures in the morning peak, and

> 57 arrivals and departures in the evening peak.

As stated above no consideration has been given to the fact the development could well operate for a 24 hour period and no calculation is given in respect of non-peak H.G V. movements.

6.3.1. It is stated the resultant proposed traffic trip generation has been distributed onto the local highway network using a distribution profile based on the 2011 Journey to Census data. It is noted that this methodology is now 13 years old and this leads to the question as to whether the same has been updated.

6.3.3 Table 6 3.4 JWT Routes (Car) and JTW Routes (HGV)

From the information extracted from the Tables the percentage splits for both types of vehicle are as follows.

C 51% A 14 (east)

D 31% Harrington Road to (Rothwell Town Centre) the same.

Further reference to these percentage splits will be referred to Section 8.

7. FUTURE BASE LINE CONDITIONS

It appears that the planning application reference KET/2018/0950 (residential) and other planning permissions on this building estate to the north of the development site have not been included and therefore without this it means the methodology and results are inaccurate and cannot be relied upon. This Development takes in the newly constructed Stag Road leading from the A6 to the B576 approximately 850m from the Development Site.

8. ANTICIPATED HIGHWAYS IMPACT

8.2.1.

It is stated a review of the anticipated levels of capacity(with the proposed development in place) at the following proposed access and Strategic Road Network Junctions

> Proposed Roundabout Site Access/Harrington.

> Proposed Ghost Island Site Access / Harrington Road.

>A14/A6 / Harrington Road / Harrington Road Round

> A14/ A16 /Orton Round / Lamport Road Roundabout.

8.2.3 A14/A6/Harrington Road/ Roundabout.

8.2.4. and 8.2.5. These sections refer to modelling results and THEORETICAL capacity

It is submitted that this methodology and surveys carried out do not reflect the present conditions at the roundabouts currently in situ .The traffic conditions particularly at peak times, morning and evening from site inspection are far worse in the locations referred to.(R.A.W will be investigating further)

8.3.4. 8.3.5 8.3.6

The content of these subsections with regard to the impact of this development will have on the local highway network is STRONGLY refuted. The impact of the development on the local highway network will be SEVERE.

The R. A. W. currently collecting material which will show that the methodology put forward by the Applicant is unreliable, and it does not reflect the present position and therefore cannot predict with any accuracy the future.

ADDITIONAL. INFORMATION.

HARRINGTON. The village is currently badly affected as a result of traffic diverting off the A14 at Junction 2, travelling Northwards along the A508 and then at Kelmarsh travelling eastwards on the Harrington Road into the village itself. This journey is undertaken to avoid traffic queues which build up between Junction 2. and junction 3.As a result of this traffic builds up within the village creating queuing here also. Vehicles then proceed along Harrington Road to the Harrington Road roundabout and after negotiating this roundabout the traffic joins the slip road forming part of junction 3. This current situation is not reflected in the applicants submission and therefore casts further doubt on the methodology used with regard to the collection of traffic data.

It is the intention of R.A.W. to demonstrate the impact of this situation on the village of Harrington by the submission of photographic, video and digital data.

If development of this site is permitted in accordance with the Applicants submission the traffic passing through Harrington Village will have to negotiate the new roundabout proposed to be constructed. On reaching the new roundabout the vehicles would then encounter (particularly during the morning peak flow periods) HGVs and cars leaving and entering the development site predominantly it is suggested for journeys on to the A14 eastwards based on the applicants own calculations contained within tables 6.4 and 6.5. This will also have the effect of creating another spot where queuing will inevitably happen with traffic build up along the Harrington Road west.

In addition traffic generated from the development site will severely impact upon traffic travelling down the A6 to join the A14 slip road at junction 3.

Vehicles travelling north along the A6 from the direction of the Orton roundabout or from Harrington Road east will also be affected should the development be permitted.

It should also be noted that in addition to HGV's using the development site HGVs travelling to and from the Truck Stop will continue to impact upon the Harrington roundabout and also the Orton Roundabout.

Traffic from the site will also cause further congestion having joined the A14 at Junction 3A. Resulting in more queuing on both the slip road and also the A14 itself.

HARRINGTON ROAD EASTWARDS FROM THE HARRINGTON ROAD ROUNDABOUT INTO ROTHWELL. This Road is a class C road with footpaths on either side and residential houses of various types and ages. The Applicants own statistics indicate that car and HGV traffic along this road will increase by 31% in both cases. Along the length of this road cars and vans can be found parked next to the kerb side throughout the day. This means that drivers are required to weave in and out of any spaces available in order to travel east or west along this section of the Harrington Road. The pathways are used by pedestrians and in particular mothers taking their children to the local school. The generation of more vehicles along the road with it's a joining footpaths will not be welcomed, particularly large H.G.Vs associated with a warehouse development bringing pollution and more noise to users of the footpaths and adjoining residents. It is also questionable whether large H. G. Vs will be able to navigate satisfactorily down this section of Harrington Road if at all due to the ever present parking along the road side.

In August 2017 Highways England carried out a Post Opening Project Evaluation . **A14 JUNCTIONS 7-9 KETTERING BYE PASS IMPROVEMENT- ONE YEAR AFTER.** The object of the exercise was to establish (amongst other things) what benefits the construction of the third lane was having on traffic flows The information contained therein is interesting and informative.

On Page 35. at 2.71 the report states;

“In addition, it is evident that variable speeds reduce significantly along the eastbound carriageway between junctions 3-6 in all periods. This could be due to the limited carriageway spacing between these junctions resulting in increased levels of merging/ diverging and therefore lower vehicle speeds. In addition EAR (2013) indicated that a gradient climb along the east bound carriageway would result in slower vehicle speeds.”

COMMENT

This can be seen clearly when standing on the bridge forming part of the B576 crossing the A14 near to where the slip road J3a joins the A14 . It is not therefore difficult to envisage significant traffic flow problems from the cars and HGVs joining the A14 from the proposed development. Inevitably there will be further traffic congestion between junctions 3 and 3a leading to more queuing on this particular stretch of Road in addition to the slip roads joining the A14 at junctions 3 and 3a.

JOURNEY TIMES. PAGE 43

This States “ Despite the observed reduction in journey times along the scheme section the average eastbound journey times along the A14 carriageway(between Junction 2 and 12) have experienced an overall increase in journey times during the inter peak and PM peak periods.”

COMMENT

This indicates that the completion of the extra Lane between Junctions 7-9. had no beneficial impact on traffic movement between Junctions 3 -3a it is submitted that due to increased traffic movements since 2017, the date of the evaluation ,an increase in traffic will have occurred

7 CONCLUSIONS. Taken from Table 7.1 on page 91

“Objectives / Has the objectives been achieved.

Objective. The scheme should reduce the effects of queuing on the slip roads on mainline flow.

Has the objective been achieved?

Additional carriageway capacity along the A14 scheme section (7 to 9)will reduce the impact of vehicle queues on the slip roads on mainline flow and the evaluation concludes that this desired effect had been achieved.”

COMMENT

It is felt that the contents of the evaluation report are useful because they indicate. prior to the addition of the third lane it is known that HGVs travelling from CORBY along the A43 and joining the A14 at junction 7 we're adding to the traffic flow problems down the slip road merging with traffic proceeding eastwards along the A14. By August 2017 it would appear at that time the queuing problem on the slip road had been resolved

The report by virtue of its contents shows that the addition of the third lane had no beneficial effect on the A14 between junctions 3 and 3a.

It is not therefore difficult to envisage that with the predicted volumes of traffic calculated by the Applicant the resultant effect on junction 3 will be the same as the situation that existed at junction 7 before the third lane was incorporated and thus adding to the Travel difficulties currently encountered by local traffic joining the A14 at Junction 3.and Junction 3a.

Finally, with regard to the Appraisal Summary Table on Page 35 and the heading Journey Quality.. it states (amongst other things) “Traveller stress would be reduced through reduction etc in “ frustration, and fear of accident” and with regard to this the Quantitative Measure of the assessment the addition of the extra lane for all reasons stated therein was described as ; Large Beneficial.

It is submitted that by the addition of large volumes of Traffic joining Junction 3 from the development site the effect on drivers will be exactly the opposite with regard to their journey when attempting to join the A14 at both Junction 3 and 3a

CONCLUSION.

In summing up it is submitted the construction of warehouses on the proposed site will not bring any desirable benefit to the residents of Rothwell and the surrounding villages but will merely add to traffic overload to an extremely busy road network. Traffic movement to and from the site will introduce further noise and pollution, to the locality and would be made worse if 24 hour working takes place. The development will impact severely on people residing in homes nearest to the development site .i e. Terry Smith Avenue and Roads off forming part of the Estate. It is also felt that the Applicant has no real appreciation of the current traffic conditions which are already endured by the people of Rothwell and the surrounding villages which of course is not helped by the fact (as shown herein at Section 7) that detail was not incorporated into the Applicants methodology. However, it is not suggested this detail would help the Applicants submission as this would only be a contributory factor demonstrating (but not exclusively) the true position regarding the Local Traffic situation.

EMERGENCY SERVICES. With the A14 only comprising dual carriage ways the large numbers of vehicles from the development site joining the A14 will not in the case of an accident have a desirable effect by increasing the volume of traffic.

The right to add further submissions to this letter of objection is requested as more material becomes available.



APPENDIX 6 - ECOLOGY AND BIODIVERSITY

Environmental Objection on the following grounds:

Conflict with NNC Joint Core Strategy, Policy 19

The delivery of green infrastructure in the Kettering area.

This site, if approved, will be built across and therefore block local green infrastructure corridors linking from the south the major sub regional corridors between Rothwell & Desborough.

Section 2 – paragraph i - “Not permitting development that compromises the integrity and therefore that of the overall green infrastructure network”

Green infrastructure improves the quality of life for residents and enhances biodiversity. Building this speculative industrial estate will contravene both National Planning Policy Framework paragraphs 99 and 114 and local plans and strategies.

Serious flaws in surveys Appendix 8 Bats / Crested Newts / Breeding Birds / Biodiversity net gain

Although we appreciate the professionalism of the property consultants and ecologists employed by Harworth Property to follow national guidelines it seems like a rapidly completed desk report with many errors and omissions which should be rejected and a complete new survey undertaken.

We have extracted a sample number of errors to make our point as follows :-

- Bat survey – approximately 25 to 30% of the proposed site has been missed out – is this a deliberate omission because this is where bats are found or incomplete plans from Harworth or incompetence on behalf of the surveyor. This undermines the credibility of the whole report.
- Great Crested Newt survey – the original survey from 2022 found no Newts but the 2024 survey (eDNA results) show newts in a pond in an adjoining field but no results are forthcoming for the ponds within the site are included, again an omission? Or a deliberate attempt to deceive - not good enough!
- Birds – the following are extracts from the Bird survey report :-
- 4.1.1 - The Site held a moderate diversity and abundance of lowland farmland breeding birds. A total of 5no. UK Red List species and 5no. UK Amber List species were considered to be holding territory within the indicative site boundary. Additionally, the Site offered a

variety of foraging or nesting habitat for breeding birds, including open habitats, hedgerows and farm buildings.

- 2.4.2 Accuracy of territory counts within the additional 4no. fields to the west of the indicative site boundary will be compromised. Whilst Skylark were recorded singing over the additional redline boundary fields, it is plausible that hedgerow species such as Yellowhammer, Dunnock and Whitethroat will have been under recorded within this additional area

Be under no illusion, there is nowhere else within the site or surrounds for these birds to nest and survive. We have lost 60% of the skylarks in the last few years (red list of endangered species). This existing area is the last chance for survival in the area. The developer has also recognised that the nesting sites will be destroyed during construction – this of course is an illegal act.

Appendix 8.4 Breeding Bird Survey extracts for assessment.

4.2 - Impact - Breeding Birds

- The proposed development will result in the permanent loss of ~64Ha of arable and modified/other neutral grassland, hedgerows and farm buildings which all support breeding birds.

- This permanent loss of these habitats will result in the reduction of suitable nesting and foraging habitat for variety of species of conservation concern including Skylark and Wren (10 pairs), Yellowhammer (9 pairs), Dunnock (7 pairs), Woodpigeon and Whitethroat (5 pairs), Linnet (3 pairs), Song Thrush (2 pairs), Bullfinch (1 pair).

- Additionally, the presence of commercial units has the potential displacement surrounding Skylark Territories through visual displacement, which may result in a further 2no. territories lost. It is plausible that a total of 12no. Skylark territories will be lost as a direct result of the proposed development. Furthermore, it is unlikely that the immediate surrounding farmland habitat will have capacity to absorb 12no. Skylark territories.

- There is the potential for disturbance to nesting birds during the construction phase. Given the scale of the development, it is likely that some construction works will occur within the breeding season (March to August, inclusive) and may cause a temporary disturbance to nesting birds, or destruction of active nests

Another error is under-recording the total site area. We have no confidence in the data provided. Clearly bird numbers are under recorded. We must object to the continued use of 'plausible' in mitigation of this proposed countryside destruction.

Biodiversity Net Gain :

The BNG proposed (woodland planting) will be useless for the displaced farmland birds. (This is the developers own admission). I cannot believe that putting bird boxes on tin sheds and the implausible expectation that others can provide suitable off-site habitat can be considered as mitigation or compensation for on-site loss.



APPENDIX 7 – EMAIL RELATING TO LAND DESIGNATION



**North
Northamptonshire
Council**

Bowling Green Road
Kettering
Northamptonshire, NN15 7QX
Tel: 0300 126 3000
www.northnorthants.gov.uk

Councillor Jim Hakewill

Via Email:

Our Ref: SJR/NNLP

Date: 2nd October 2024

Dear Councillor Hakewill

Re: MEM2060: Harworth Application Rothwell - Planning Policy Status

Further to your enquiry received by North Northamptonshire Council on 24th September 2024, regarding the Planning status of land at Nunnery Farm, to the west of Rothwell the subject of an anticipated planning application.

In planning terms, the land's status is set by policies contained within both the North Northamptonshire Joint Core Strategy and the Kettering Site Specific Part 2 Local Plan. The land is not identified as an allocation within either of the Local Plan documents. Also, the land falls outside any of the settlement boundaries set by the Part 2 Local Plan, as such, and with no extant planning permissions on the land, it is classified as open countryside.

You'll be aware the Council is in the early stages of preparing a review of the Joint Core Strategy, one element of which will be to identify strategic employment land for allocation. Although this area of land is one of many that have been submitted for consideration for employment use, the Plan has not progressed to a stage in its development where any weight can be given to this land in terms of its potential for development.