

Sent via Email

Mr Daniel Callis
Planning Department
West Northants Council
The Guildhall
St Giles Square
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4th October 2024

Reference: Manor Oak Homes Planning Application (2023/5978/EIA)

Dear Mr Callis

Re: Grange Park Parish Council's response to:

- **MAC Technical Note – LLFA Response (476-TN-01-A August 2024)**
- **Grange Park Statement in Support of Recreational Provisions v1 SR 220724 (Nicholsons)**

Grange Park Parish Council (GPPC) are writing in response to the above recent reports. These reports were posted under the planning application webpage from the 31st July 2024 and more recently. This was after the consultation period specified to GPPC. GPPC was not made aware of the additional documentation by West Northamptonshire Council (WNC). GPPC have to question whether relevant consultees are aware of these ad hoc submissions.

GPPC will comment on both the above documents collectively below as the responses, in parts, contradict each other and highlighted GPPC's concerns with the off-site changes required as part of this planning application:

1. MAC Technical Note – LLFA Response (August 2024 476-TN-01-A)

MAC were instructed by Manor Oak Homes to prepare a response to comments from the Lead Local Flood Authority (LLFA) dated 17/07/24.

Appendix B, Proposed Drainage Strategy Parcel 1 & 2 Catchment MAC drawing no. 476-FRA02C

Within the above drawing a surface attenuation detention basin is evident within the neighbourhood park. However, the surface attenuation detention basin is not evident in Appendix A: Landscape Strategy Plan Ref: 6473.ASP8.LSP. Revision B within the Nicholsons Grange Park Statement in Support of Recreational Provisions.

Why has the surface attenuation detention basin within the neighbourhood park been left out of the Landscape Strategy Plan?

Why has the surface attenuation detention basin required within the proposed land for a primary school not been documented? Both these issues should be addressed.

Appendix C, Risk of Surface water Flooding Medium and High Risk MAC drawing no. 476-E01A

According to, Appendix C, Surface water Flooding Medium and High Risk (MAC drawing no. 476-E01A) an area of development within section 2b is shown within a high-risk area.

Within Appendix C, Risk of Surface water Flooding Medium and High Risk (MAC drawing no. 476-E01A), the key, refers to a blue arrow to show existing overland flow areas. This blue arrow is not evident within the drawing.

2. Grange Park Statement in Support of Recreational Provisions v1 SR 220724 (Nicholsons)

Nicholsons have provided a statement, upon review of comments supplied by Natural England, in support of recreational provisions provided through the proposals for Grange Park, instructed by Manor Oak Homes.

Nutrification

Within the Nicholsons statement, under the sub-heading of ‘Ecology statement’ is the following:

“Through appraisal of the updated plans, we believe that the proposed provision of within-site and local (non-SPA) recreational routes would be sufficient to appropriately reduce recreational pressure and nutrification through dog fouling upon the SPA.”

The above quote from the document by Nicholsons includes the word ‘nutrification’. The meaning of this word is not explained in the document. An online search for this word delivers a definition of ‘the process of enriching something (e.g. the environment, a food, or drink) with nutrients.’

Is this what Nicholsons intend by use of the word nutrification?

Supporting Materials – Aspect Landscape Strategy Plan Ref: 6473.ASP8.LSP. Revision B (Appendix A)

The statement provided by Nicholsons refers to the Aspect Landscape Strategy Plan, Ref: 6473.ASP8.LSP. Revision B, with particular attention to the creation of landscaping buffers, circular walking routes as well as on and off-lead dog walking areas.

The plan does indicate walking routes for both on and off-lead dog walking, however neither of these are circular routes in their own right.

As explained above, the proposed surface attenuation detention basin within the neighbourhood park and the proposed land for a primary school are not shown on the Landscape Strategy Plan. Why have these surface attenuation detention basins been left out of the Landscape Strategy Plan? This needs to be addressed and consultees are made aware of the changes and have the opportunity to provide comment.

Off-Site Landscape Changes

Points 3 and 4 of the Aspect Landscape Strategy Plan Ref: 6473.ASP8.LSP. Revision B refer to the proposed creation of a new native tree belt on the proposed site. No reference has been made to the significant changes proposed to off-site landscapes for this planning application. Are Natural England aware of the destruction of the Grange Park structural belt and important hedgerow as part of the proposed off-site changes?

As stated in the Grange Park Parish Council’s Response to Updates to Manor Oak Homes Planning Application, dated 24th July 2024,

“The proposed off-site changes would result in existing mature trees and native hedgerow being destroyed. Specifically, the 3m footway/cycleway along Wootton Road would result in the destruction of the Grange Park structural belt. This would go against the Piddlington Local Landscape Character Area guidance and the advice provided by the WNC Landscape Officer.

Is it not misleading and contradictory to propose the inclusion of landscape buffers to the proposed site AND at the same time, propose destroying established and existing land buffers, specifically the Grange Park Structural Belt?

The destruction of the off-site landscape buffers would have a detrimental impact to Grange Park. The existing structural belt consisting of important trees and native hedgerow. A site boundary providing screening to Grange Park and the Grange Park Allotments from the local roads, reducing soil erosion and also providing valuable habitat for wildlife, that calls it home.

How could a planning application which provides landscape buffers on the proposed development site, but requires the destruction of existing Grange Park landscape buffers, be approved planning permission?”

Natural England, along with other consultees for this planning application, do not have the parish council’s local knowledge and awareness of the proposed site and the surrounding landscape. They do not have the opportunity to comment on these changes as there has been no assessment of the impact to trees, hedgerow, ecology, landscape and drainage. There is also no road safety assessment to any of the proposed off-site changes.

As stipulated in all previous correspondence regarding this planning application, GPPC have consistently requested off-site changes need to be assessed and require planning permission.

3. Inadequate Location Site Plan

As stated above, the off-site works have not been assessed the same as on-site work. Subsequently all consultants have no assessment information on the off-site changes and the impact of these.

How can you consider something without assessment? The off-site changes are pivotal for this proposed application and need to be assessed as part of the planning application process and not part of conditions of a Section106.

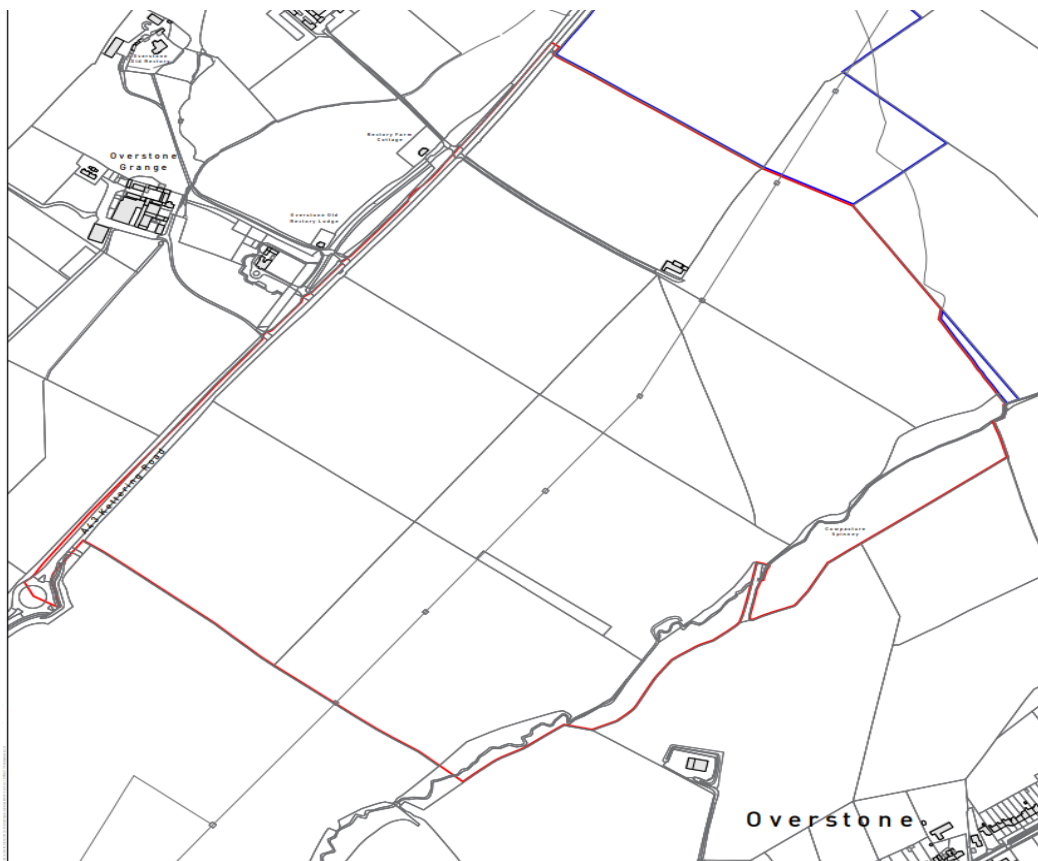
The GOV UK website states, “The application site should be edged clearly with a red line on the location plan. It should include all land necessary to carry out the proposed development (eg land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings). A blue line should be drawn around any other land owned by the applicant, close to or adjoining the application site.”¹

The Site Location Plan submitted by Manor Oak Homes does not comply with the above requirements. Manor Oak Homes should be required to submit a Site Location Plan, where proposed off site changes which are necessary for the proposed development, are included within the red line of the planning application. The land would then be subject to the assessments on trees, hedgerow, ecology, landscape impact, drainage and road safety assessment.

Please see below, examples of planning applications that include off-site changes and have included these within the red boundary line of the location plan:

Planning Application Reference: DA/2020/0001 - outline planning application for circa 1,600 dwellings etc at Land To East Of Kettering Road, Overstone, West Northamptonshire

The site location plan below is for this proposed development includes highway land needed for works. This includes part of the A43 road.



¹ [Making an application - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Planning Application Reference: WNS/2021/0492/EIA - outline planning application for up to 700 dwellings etc at Land to the West of Brackley, West Northamptonshire

The site location plan includes highway land needed for works. This includes part of the A422 road.



Conclusion

GPPC has identified concerns associated with both the MAC Technical Notes – LLFA Response (August 2024) and the Grange Park Statement in Support of Recreational Provisions (Nicholsons). The documents are contradictory and do not fully address concerns raised by consultees.

The concerns of GPPC are that there are significant issues with the lack of appropriate documentation and assessments associated with this planning application submitted by Manor Oak Home

In conclusion, Manor Oak Homes are continuing to provide new, amended and inadequate documentation as part of the planning application process and not providing significant assessment data for off-site changes. The constant changes made to the planning application, along with the significant lack of important assessments, demonstrate the problems Manor Oak Homes have regarding this isolated site. GPPC recommend the refusal of planning permission.

An isolated site will create an isolated community.

GPPC would like to receive confirmation of receipt of this letter from WNC.

Yours sincerely

Mrs Tracy Sampson
Parish Clerk
Grange Park Parish Council