

## **SOUTH NORTHAMPTONSHIRE COUNCIL – DELEGATED REPORT**

### **Neighbouring Authority Consultation**

|                        |   |                                  |  |
|------------------------|---|----------------------------------|--|
| <b>Application No.</b> | S/2018/0734/NA  | <b>Case Officer:</b>             | Suzanne Taylor                                       |
| <b>Statutory Date:</b> | <b>Expiry</b><br>18 April 2018  | <b>Consultation Expiry Date:</b> | Consults date:<br>27 April 2018<br>Re-consults date: |
| <b>Site:</b>           | Land to the north east of Junction 11 of the M40 Banbury  |                                  |  |
| <b>Proposal:</b>       | Neighbouring Authority Consultation on amended plans for 17/01044/F.(Development of land to the north east of Junction 11 of the 40 Banbury, to provide a 23,225sqm industrial building (Class B8); two office buildings of 3716sqm each (Class B1); 80 bed Hotel; Motorway Services Area with amenity building, Petrol Filling Station (with canopy, fuel pump islands, ancillary convenience store and food to go outlet) and HGV Parking; creation of a new vehicular access off the A361 together with associated alterations to the highway; parking and circulation; landscaping, drainage and associated works). Amended access arrangements, alterations to proposed buildings and amended site layout together with removal of the previously proposed hotel |                                  |  |

### **RECOMMENDATION**

**That SNC raise an objection to this application on the grounds set out below.**

### **APPLICATION SITE**

This site of approximately 12.3 hectares lies to the north-east of junction 11 of the M40 and is wholly within Cherwell district and Oxfordshire. South Northamptonshire district and Northamptonshire lie within close proximity to the north and east. The site is comprised of a long, narrow parcel of agricultural land and is bounded to the west by the M40 and to the east by the A361. The site has not previously been developed.

To the west of the site and the motorway is the Banbury Gateway retail park and Wildmere Road Industrial Estate. To the east is open countryside and agricultural fields. Banbury Flood Alleviation scheme and Cherwell Country Park are situated to the north of the application site. The town of Banbury is to the south-west of the site with the town centre some 2.25km away.

The site is predominantly flat with a number of native species field hedges which divide the site into 4 parcels.

### **CONSTRAINTS**

- Because the site is not within South Northamptonshire's district we do not have full details of the constraints for this land but it is known that the north-western corner of the site is within Flood Zone 2 and a public right of way runs adjacent to the north-western corner.
- The land within South Northants district to the north and east of the site is designated as an Important Local Gap (ILG).

## PROPOSAL

This application to Cherwell District Council (**CDC**) seeks full planning permission for 3 no. employment buildings (one larger Class B8 (storage and distribution) and two smaller Class B1 (offices/light industrial) units), a motorway service area (**MSA**) incorporating an amenity building, petrol filling station (**PFS**), a lorry park and associated highways works, parking and landscaping. An 80 bed hotel has been removed from the amended scheme and an additional, dedicated access from the A361 to serve the warehouse and offices is proposed.

**Warehouse:** The proposed B8 warehouse building would provide a floorspace of 23,690sqm (reduction of 205sqm) and include approximately 5% ancillary office space. The warehouse would be serviced via a dedicated yard on the southern side of the building. There would be 106 (reduction of 10) parking spaces provided which includes 10 (reduction of 1) disabled spaces.

**Offices:** Two B1 office buildings are proposed each with a gross floor space of 3,870sqm over three floors. A shared car park is proposed between the two office buildings providing a total of 222 spaces including 22 disabled spaces. The office buildings would be finished in brick, glazing and cladding. The amendments show a revised layout with the easternmost building set further to the south and at an angle along with additional soft landscaping.

**Hotel:** The proposed 80 bed hotel has been removed from the scheme. It would've been a four storey building with a floorspace of 2,683.65sqm and have included 81 car parking spaces (originally 64 spaces).

**Motorway Service Area (MSA):** The two storey MSA amenity building would have a gross internal floor area of 4,175.3sqm, which would provide a food court and ancillary retail, on the ground and first floor. This would include facilities for the sale and consumption of hot and cold food and beverages for consumption on and off the premises. The building would also include toilets/hand washing facilities for drivers. Servicing of the MSA building would be via a dedicated yard located on the eastern side of the building. The MSA amenity building would also incorporate staff areas including kitchens, staff rooms, storage and refuse areas and office space.

**Petrol Filling Station (PFS):** The PFS building would have a floor area of 694sqm and would incorporate a sales point for fuel and also ancillary convenience goods and "food on the go" area. The petrol filling operations would comprise five pump islands (10 fuel lanes) for cars and light commercial vehicles sitting beneath a filling canopy; together with five separate HGV fuel pump islands. The PFS building also includes an area of 94sqm dedicated to HGV driver's facilities; to include shower and washing facilities for drivers. The MSA and PFS would have 440 car parking spaces provided (originally 292 spaces). The amendments involve changing 11 coach parking spaces to 15 caravan parking spaces.

**Lorry Park:** Parking facilities for Heavy Goods Vehicles (**HGVs**) will be provided, for up to 70 vehicles (increased from 61 vehicles and formerly 36 spaces) and would now incorporate the 11 coach parking spaces. The parking would operate on the basis of either advanced booking or booking or payment on arrival. The site would provide secure parking with CCTV and on site management.

**Highway works:** Vehicular access to the site would be provided from A361 via an off line, new roundabout, located circa 340m north of the M40 junction 11 roundabout. The proposal would also include the widening of the A361 approach to the Motorway

roundabout. The amendments propose an additional access further north off the A361 to exclusively serve the warehouse and office buildings.

### RELEVANT PLANNING HISTORY

- S/2017/1377/NA - Industrial unit (Class B8); two office buildings (Class B1); 80 bed hotel; motorway services area amenity building; petrol filling station with canopy, fuel pump islands, ancillary store and food to go outlet; HGV parking; creation of a new vehicular access off the A361; parking and circulation; landscaping and associated works – (This is the original consultation on the current application consult for which the proposals have now been amended) – Objections raised.
- S/2012/0339/NA - Change of use from agricultural land to country park and creation of car park – No objections
- S/2009/0490/NA - Construction of Banbury Flood Alleviation Scheme & associated works – No objections.

### COUNCIL CORPORATE PRIORITIES

The Council's 2017/18 Business Plan sets out the council's three strategic priorities which form our overarching five-year business strategy. Below these are the key actions for the year 2017–18. This is a plan which looks to the future taking into account the priorities and aspirations of the communities who live and work in the district.

The corporate priorities of most significance to the determination of planning applications and appeals are to “Grow and Protect the District”. It seeks to do this via the key objectives of; (1) ensuring the character of the district is preserved; (2) protect the built heritage; (3) preserve the environmental quality of the District; (4) mitigate the effects of High Speed 2 construction; (5) deliver affordable housing.

The remaining corporate priorities are of significance to the determination of planning applications and appeals via the key objectives of delivering the Brackley, Towcester and Silverstone Masterplans, increasing tourism and employment in the District, providing enhanced leisure facilities, safeguarding the vulnerable, increasing a return on assets and delivering a high quality service.

The above corporate priorities are considered to be fully compliant with the policy and guidance contained within the National Planning Policy Framework and National Planning Practice Guidance.

### KEY ISSUES

- The amendments/additional information and how these address affect the objections already raised.

### RELEVANT PLANNING POLICIES

NPPF: 1. Building a strong, competitive economy; 2. Ensuring the vitality of town centres; 3. Supporting a prosperous rural economy; 4. Promoting sustainable transport; 7. Requiring good design; 10. Meeting the challenge of climate change, flooding and coastal change; 11. Conserving and enhancing the natural environment; 12. Conserving and enhancing the historic environment.

CHERWELL ADOPTED LOCAL PLAN PART 1: Policies ESD1 Mitigating and Adapting to Climate Change; ESD2 Energy Hierarchy and Allowable Solutions; ESD

3 Sustainable Construction; ESD4 Decentralised Energy Systems; ESD 5 Renewable Energy; ESD 6 Sustainable Flood Risk Management; EDS 7 Sustainable Drainage Systems (SuDS); Banbury 15: Employment Land North East of Junction 11; SLE 2: Securing Dynamic Town Centres.

SOUTH NORTHAMPTONSHIRE LOCAL PLAN (SNLP): EV1 Design; EV8 Important Local Gap.

### CONSULTATIONS

Publicity for this application is the responsibility of Cherwell District Council, as they are the determining authority. This Council is a consultee.

Middleton Cheney, Chacombe and Overthorpe Parish Councils have been advised of this consultation for information purposes.

Middleton Cheney have provided a copy of their objection letter which was sent to CDC.

### REPRESENTATIONS

Publicity for this application is the responsibility of Cherwell District Council, as they are the determining authority. This Council is a consultee.

NCC Highways, Environmental Protection and Planning Policy have been advised of this consultation and have provided the following responses:

NCC HIGHWAYS: Make the following updated comments:

*With regards to Technical Note 4, whilst the response appears to provide confirmation that the applicant has agreed to the routing agreement, construction management plan and contributions towards traffic calming, (which we would be seeking to be secured by condition and / or S106 obligation as appropriate), the applicant hasn't addressed the two final points raised:*

- 1. The impact on the A422 / B4525 roundabout junction. A percentage cut-off for assessment is not accepted as this is against a high baseline level of traffic (as the intersection of an 'A' and 'B' classification road. As such Northamptonshire Highways remain of the view that an assessment would be merited to demonstrate that the junction can be expected to operate within reasonable capacity in the forecast year.*
- 2. The provision of a controlled pedestrian crossing to provide safe access to the southbound bus stop. At present the revised note refers to agreement of pedestrian crossing facilities, but does not confirm whether or not these are to be controlled. Looking at the indicative plan in Appendix C our assumption is that the crossing is proposed as uncontrolled, using the splitter on the proposed access roundabout. In light of the 'A' class of the road in question and the likely busy nature of both the road and junction, we would remain of the view that a controlled crossing would be more appropriate.*

*With regards to the specific query on HGV increases through Farthinghoe as a result of the Lorry Park, this is a more difficult issue to address. The main route in question between the A43 and M40 is the A422 and as such we would not be able to realistically implement controls on the types of vehicles using the route. The impact of additional lorries through Farthinghoe could predominantly be expected to be a potential worsening of residential amenity and as such the LPA may take a view with regards to the severity of such additional movements.*

SNC PLANNING POLICY: Continue to object to the proposals which are contrary to the adopted Development Plan and make the following observations on the amendments:

*"This site is allocated in the Cherwell District Local Plan for employment uses (Use Classes B1, B2 and B8). The current amended proposal includes **B1 (office)** and **B8 (warehouse)** uses (with 328 car parking spaces), but it would be dominated by uses that are contrary to the Development Plan; ie. a **Motorway Service Area/Petrol Filling Station** (with 455 car parking spaces / previous scheme had 292, so an increase of 163 car spaces), **HGV parking area for 70 vehicles** / previous scheme had 36, so an increase of 34 HGV spaces. Overall there would be parking provision for about 783 car spaces / previous scheme had 700 car spaces, so an increase of 83 car-parking spaces across the whole site.*

*The amended proposal being consulted upon, is for a mixed use scheme that remains significantly different to what the site is allocated for in the CDC Local Plan. The proposed use of the site would be more intensive than that associated with the allocated B1, B2 and B8 employment uses. There would be significantly more activity on the site and traffic movements generated by the proposed development, than that envisaged by Policy Banbury 15. Visual intrusion and traffic impacts on SNC interests would be greater, under the proposed scheme, than a scheme submitted in accordance with the development plan. It is clearly the very large motorway service area that is contrary to the CDC LP."*

#### APPRAISAL

How the amendments and additional information affect the objection already raised by SNC.

#### PRINCIPLE OF THE DEVELOPMENT.

The principle of the development remains unchanged and therefore our concerns remain as previously stated except to remove reference to the omission of a Sequential Test which has now been supplied by the applicant:

**Policy:** The site is allocated in the Cherwell Local Plan (**CLP**) Part 1 for employment use. This specifies B1, B2 and B8 uses and indicates that proposals should provide in the region of 1,000 new jobs. Although the proposal does incorporate B1 and B8 uses it also includes uses that are not indicated in the plan; a Motorway Service Area (**MSA**), PFS and HGV parking. Overall the entire scheme is estimated to provide more than 2,000 jobs; over double the number anticipated by the allocation.

This is a mixed use scheme of a very different character to that allocated in the plan. The proposed use of the site would be far more intensive than that associated with a typical B1, B2 and B8 employment site. There would be significantly more activity on the site and traffic movements generated by the proposed development than that envisaged by Policy Banbury 15. The number and type of buildings would make for a significantly more visually obtrusive development than that allocated in the plan.

Bearing in mind the substantial differences between the proposed scheme and that set out in Policy Banbury 15 it is contended that this application is a departure from the development plan and is therefore unacceptable in principle.

Saved policy TR8 of the Cherwell Local Plan 1996 states: "**BEYOND THE BUILT-UP LIMITS OF SETTLEMENTS THE RELEASE OF NEW SITES FOR PETROL**

*FILLING STATIONS AND OTHER COMMERCIAL FACILITIES FOR THE MOTORIST WILL BE PERMITTED ONLY WHERE THE NEED FOR SUCH FACILITIES CAN BE CLEARLY DEMONSTRATED."*

Paragraph 5.26 of the CLP 1996 specifies *"that the existing provision of petrol filling stations, roadside restaurants and rest areas will be sufficient to meet the needs of motorists in the plan for the foreseeable future. This conclusion takes into account the Cherwell Valley motorway service area at Ardley which will fully meet the needs of motorway travellers within the District according to the criteria in Circular 23/92. The Council will resist proposals for new petrol filling stations/service areas in the vicinity of the motorway interchange at Banbury which would prejudice the free flow of traffic to and from the motorway"*.

This policy and the supporting information clearly indicate that MSAs are only acceptable IF a need for them can be demonstrated and in the case of the Banbury motorway junction such facilities will be resisted.

It is noted that the applicants have carried out a sequential test and therefore our comments on this omission can be removed.

No RIA has been undertaken. Policy SLE 2: Securing Dynamic Town Centres of the CLP Part 1 states that a RIA should be carried out for retail proposals over 2,000sqm in Banbury and the NPPF sets out a threshold of 2,500sqm where a locally set threshold is absent. The retail element of the MSA would exceed both these thresholds and therefore a RIA should be submitted in support of this application. The absence of this is another reason to refuse this application.

Paragraph 31 of the NPPF (4 Promoting sustainable transport) concerns the provision of "roadside facilities for motorists". The implication of this paragraph is that MSAs should only be provided where there is an established need: *"The primary function of roadside facilities for motorists should be to support the safety and welfare of the road user"*. The issue of need is discussed below.

**Appeal decision:** A recent appeal decision (ref: APP/M1710/W/16/3162359) on an application for a MSA with a PFS, 60 bed hotel, restaurant and 2 x drive-through restaurants/coffee shops in East Hampshire offers a comparable example. This appeal was dismissed on the principle, on the fact that insufficient information had been provided to assess the impact upon the local market town centre and due to the harmful impact of the proposal upon the character and appearance of the area.

The Inspector acknowledges that a RIA was needed in this case because the retail floor space exceeded the locally set threshold but considers that the assessment is inadequate and in itself forms a reason for dismissing the appeal. This also supports the contention that a RIA should be carried out for this application to justify this amount of retail floor space outside of the town centre.

Noting that there are PFSs accessible from the trunk road within a reasonable distance of the appeal site the Inspector states: *"that there is already adequate provision for motorists as regards petrol filling stations along this stretch of the A31"*. In arriving at this view the Inspector refers to the guidance in the Department for Transport (DfT) Circular 02/2013 which recommends maximum distances for motorist facilities on the strategic road network. This will be discussed in more detail in the section on 'Need' below but this indicates that the necessity for such a facility must be established where the proposal is at odds with the development plan. The

Inspector also observes that there is already a hotel, restaurants and existing “provision for motorists to obtain refreshments” in the vicinity.

With regard to Paragraph 31 of the NPPF the Inspector concludes: *“Although I consider that paragraph 31 of the Framework does not specifically require a need test, it does state that the primary function of roadside facilities should be to support the safety and welfare of the road user. I am not convinced that the scale of the development proposed is either necessary or proportionate to support the safety and welfare of road users...”*. It is therefore contended that if there is no established ‘need’ for the MSA in terms of safety or welfare such a development cannot be justified in an open countryside location in conflict with the development plan.

**Need:** The question of whether there is a need for a MSA in this location has also been raised in terms of considering the acceptability of this application. The DfT’s guidance on MSAs (DfT Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development) recommends the spacing of service areas to allow stops approximately every half an hour or 28 miles. The proposed MSA at Junction 11 would be only approximately 15 minutes or 13 miles from the Warwick Services to the north and approximately 15 minutes or 11 miles from the Cherwell Valley Services to the south. Between the two service areas is a distance of 24 miles with a typical driving time of 27 or 28 minutes. Therefore the existing spacing between the Warwick and Cherwell Valley MSAs is within the threshold recommended by DfT and this indicates that there is no need for an additional service area on this stretch of the M40.

It should also be noted that according to the DfT guidance MSAs on existing junctions are the least preferable option... *“On-line (between junctions) service areas are considered to be more accessible to road users and as a result are more attractive and conducive to encouraging drivers to stop and take a break. They also avoid the creation of any increase in traffic demand at existing junctions.”* Therefore it cannot be justifiable to provide an MSA in this less desirable location when there is no need for such a facility.

Furthermore, it is contended that Banbury can already provide services for motorists who need to break their journey for fuel or refreshments etcetera as there is a hotel, restaurants, a drive-through coffee shop, a PFS and a retail park all within half a mile or less of junction 11.

#### HIGHWAY SAFETY AND TRAFFIC IMPACTS.

A further Transport Technical Note has been provided as an addendum to the Transport Assessment.

This has addressed some of the comments/concerns raised previously but NCC recommend the following matters still need to be addressed if planning permission is to be granted:

1. The impact on the A422 / B4525 roundabout junction. A percentage cut-off for assessment is not accepted as this is against a high baseline level of traffic (as the intersection of an ‘A’ and ‘B’ classification road. As such Northamptonshire Highways remain of the view that an assessment would be merited to demonstrate that the junction can be expected to operate within reasonable capacity in the forecast year.
2. The provision of a controlled pedestrian crossing to provide safe access to the southbound bus stop. At present the revised note refers to agreement of

pedestrian crossing facilities, but does not confirm whether or not these are to be controlled. Looking at the indicative plan in Appendix C our assumption is that the crossing is proposed as uncontrolled, using the splitter on the proposed access roundabout. In light of the 'A' class of the road in question and the likely busy nature of both the road and junction, we would remain of the view that a controlled crossing would be more appropriate.

3. With regards to the specific query on HGV increases through Farthinghoe as a result of the Lorry Park, this is a more difficult issue to address. The main route in question between the A43 and M40 is the A422 and as such we would not be able to realistically implement controls on the types of vehicles using the route. The impact of additional lorries through Farthinghoe could predominantly be expected to be a potential worsening of residential amenity and as such the LPA may take a view with regards to the severity of such additional movements.
4. They continue to recommend that a financial contribution towards traffic measures within Chacombe & Middleton Cheney to deter Rat-Running of £30,000 per village be secured via a Section 106 Agreement;

There is continued concern that the proposal would generate a significantly higher level of car and HGV movements than that of the allocated business use. This is further borne out by the fact that the anticipated levels of employment would be roughly double that indicated by Policy Banbury 15.

Local parish councils within South Northants such as Middleton Cheney, Overthorpe, Farthinghoe and Chacombe have expressed concerns about an increase in rat-running and HGV movements in their villages. There is particular concern about more HGV traffic using the A422 link between Banbury and Brackley/Buckingham where the village of Farthinghoe is a 'pinch-point' on this route. The TA should consider these impacts and offer mitigation where necessary.

The TA also incorrectly refers to the 500 Bus Service from Brackley to Banbury via Chacombe as providing a 1/2 hourly service. However, this has been reduced to hourly and it is presently being considered that this service would not visit Chacombe (or the A361). Stagecoach who run the service are quoted in the Banbury Guardian as saying: "Buses will run between Middleton Cheney and Banbury via the A422 instead of via Chacombe, via the A361 to give a more direct journey and avoid much of the traffic congestion at peak periods".

The applicants have considered the impact of the HS2 construction traffic within the Transport Technical Note which will be using Junction 11 of the M40 for access and egress from the A361 so our comments on this omission are removed. However, there are still concerns about increasing traffic on the A361 and it is for this reason that SNC would still recommend that Daventry District Council are consulted on this application.

If CDC are minded to approve this application it is requested that NCC/SNC are consulted on an HGV Routing Agreement/Construction Management Plan, S106 contributions to mitigate rat running and for the provision of a safe, dedicated cycle route from Middleton Cheney to Banbury.

#### VISUAL IMPACTS.

The removal of the hotel from the scheme does allow for some additional soft landscaping but there is still concern about the visual impacts of the development.

The Landscape Visual Impact Assessment (**LVIA**) provided with this application is flawed because it contains incorrect information and fails to consider key documents. These errors and omissions all suggest that the visual impact of the development upon South Northants (**SN**) have not been properly considered.

The assessment notes that the area is identified as a Special Landscape Area by SN but this is not correct. There are some areas at the periphery of the study area identified by the Landscape Consultants which are designated as being of Special Landscape Value but the key designation for the study area which is not mentioned is that it is an Important Local Gap. This designation is to prevent the coalescence of settlements and therefore the LVIA should address this potential impact upon SN.

The appraisal also fails to consider the Northamptonshire Landscape Character Assessment relying on the Cherwell, Oxfordshire and Natural England National Assessments alone.

It is also observed that the 2km zone of study is not centred on the middle of the site but is outside of the site boundary to the north-west thereby omitting Overthorpe from the potential viewpoints. A site visit has confirmed that there will be views of the site from Overthorpe Road, Overthorpe which is in an elevated position to the south-east of the site. The LVIA should therefore include an assessment of this viewpoint.

It is noted that even after the proposed mitigation is established the LVIA concludes that the impact upon surrounding landscape is slight-moderate and is moderate upon the site itself. Of more concern are the conclusions that views from the A361 and the footpath in Cherwell Country Park (200m north of the site) will be moderately-substantially adversely affected even after mitigation.

It is considered that the proposed use is significantly more intensive, higher density and would result in a more varied mix of building forms, styles and materials than the B1, B2 and B8 employment use envisaged by the development plan. Such a scheme would have a far more harmful, urbanising impact upon this countryside setting than a straightforward, lower density, business park and the increased level of car and HGV movements would further erode the rural character of the area. Whilst SNC notes that the removal of the hotel allow for a slightly more spacious layout and increased soft landscaping the scale and intensity of uses on this site would still have detrimental visual impact by virtue of there being less space for soft landscaping and the creation of a denser urban development.

The scale of this proposal remains larger than that described in Policy Banbury 15 and consequently the scope for providing significant landscaping to adequately soften the development on this rural edge are reduced. The landscaping buffer to the eastern boundary is considered to be of insufficient depth in some sections to allow the level of planting required to mitigate the visual impact. This argument is supported by the comments of Cherwell's Landscape Planning Officer who states: *"The concentration of buildings and parking on the proposal do not leave sufficient space for effective mitigation, particularly as viewed from the east."*

If CDC are minded to grant permission for this development a consistent approach to the design and materials for the proposed buildings is recommended and dark coloured, matte finish materials are requested for the roofs and, at least, the upper sections of the walls. This is particularly critical for the B8 warehouse and B2 office buildings. Furthermore, SNC would request that the external lighting complies with the submitted scheme and any further external lighting of the buildings or signage is controlled to ensure that light pollution from the site is minimised/controlled.

#### IMPORTANT LOCAL GAP AND COALESCENCE.

Policy EV8 of the SNLP seeks to provide additional protection for relatively narrow stretches of undeveloped land between existing urban areas and neighbouring villages; *"If development were to be permitted it could affect the comparatively small and important stretch of open countryside between Banbury, Junction 11, Chacombe, Middleton Cheney and Warkworth and would severely erode this gap which has retained its rural character, despite the construction of the A422 bypass"*. Whilst it is noted that the development would not fall within the area designated as an Important Local Gap (ILG) there is concern that allowing the proposed development would open the door to other similar schemes which would cumulatively erode the actual and perceived gap between the edge of Banbury and neighbouring settlements within SNC.

The LVIA fails to identify this allocation and does not explore how the development would impact upon the ILG. This is an omission which should be addressed.

#### ENVIRONMENTAL IMPACTS.

It is noted that CDC's screening opinion has determined that the proposed development does not require an Environmental Statement. Whilst SNC disagree with this assessment our comments on the need for an ES have been removed from our response.

It is noted that the applicants have attempted to address the inadequacies of some of the technical assessments such as the Transport Assessment, FRA (and Drainage Strategy) and Ecological Appraisal but it remains for the technical consultees to confirm whether these amendments and additions are satisfactory. The applicant has provided an appraisal of the quality of the agricultural land and now submitted a statement regarding Socio-Economic Benefits.

SNC observes that the Socio-Economic Benefits statement excludes an assessment of the impacts upon Brackley as it lies outside of a '15 minute drive' buffer from the site. This buffer is incorrect as the centre of Brackley is 14 minutes' drive from the site according to Google maps. Therefore SNC have concerns about the robustness of this statement.

SNC remain concerned about the adequacy and accuracy of the LVIA and the applicants have not supplied a Statement of Community Involvement, Desk Based Archaeological Assessment, Air Quality Assessment or details of how the site will be serviced by utilities. These issues need to be properly considered before this application could be approved.

In light of the above objections it recommended that SNC respectfully request that CDC REFUSE this amended application.

#### CONCLUSION

In light of the above appraisal it is recommended that SNC raise an objection to this amended application.

SJT

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Case Officer signature

Tracey Hill

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Authorising Officer signature

16/05/2018

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Date

17.05.18

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Date