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Mr Paul Bland  
North Northamptonshire Council  
East Northamptonshire Area  
Cedar Drive  
Thrapston  
Northamptonshire  
NN14 4LZ

**VIA EMAIL**

31209/A3/CC/SH

16<sup>th</sup> December 2022

Dear Paul,

**THRAPSTON BUSINESS PARK: SUBMISSION OF ADDITIONAL INFORMATION**

**PLANNING APPLICATION REFERENCE: NE/22/00698/OUT**

We write on behalf of our Client, IM Properties Developments Ltd (IM Properties), to formally respond as applicable to comments contained in the responses received from statutory consultees to date in respect of hybrid planning application NE/22/00698/OUT, for a proposed employment park (Classes B8, B2 and E) referred to as 'Thrapston Business Park'. This information is being submitted for consultation (30-day).

As set out in the application documents, IM Properties is bringing forward plans for a well-designed and highly sustainable new business park north of the A14 at Thrapston. It has been confirmed that DSV, a global transport and logistics business, propose to occupy Unit 1. The site is in a prime location to meet the significant demand for new employment space in this part of Northamptonshire – helping to retain existing businesses, attract new employers to the area, and support a more resilient local economy.

The hybrid planning application was submitted to the North Northamptonshire Council on 20th May 2022 and was validated on 1st June 2022. IM Properties and the appointed consultant team are negotiating with Council officers and statutory consultees in relation to the application.

The following information enclosed alongside this letter, forms part of our formal response during the determination of the planning application and supersedes or supplements the previously submitted documents as follows:

***Updated Information (superseding previously submitted documents)***

- Updated Design and Access Statement (DAS), prepared by SGP (dated December 2022);
- Updated Reserved Matters Design Guide (RMDG), prepared by SGP (dated December 2022);
- Updated Elevation Plan (Ref. 19-282-SGP-01- ZZ-DR-A- 131300);
- Updated Landscape and Visual Impact Assessment, prepared by Nicholsons Lockhart Garratt (dated December 2022).

***New Information (supplementing previously submitted documents)***

- Environmental Colour Assessment – Colour Justification Document, prepared by Nicholsons Lockhart Garratt (dated October 2022); and
- Response to Peterborough City Council, prepared by DTA (dated October 2022).

***Updated Environmental Statement Documents (superseding previously submitted documents)***

The below Environmental Statement (ES) documents are also being submitted as part of the formal response:

- Environmental Statement Volume 1: Chapter 8 Noise and Vibration;
- Environmental Statement Volume 1: Chapter 9 Landscape and Visual;
- Environmental Statement Volume 1: Chapter 17 Assessment of Cumulative Effects;
- Environmental Statement Volume 1: Chapter 18 Summary of Environmental Statement;
- Environmental Statement Volume 2: Appendix 8.5 Operational Noise Assessment;
- Environmental Statement Volume 2: Appendix 9.1 Landscape and Visual Assessment;
- Environmental Statement Volume 2: Appendix 12.6 Bat Activity Surveys;
- Environmental Statement Volume 4: Non-Technical Summary (NTS).

A detailed explanation of the above ES documents is set out in a separate covering letter prepared by Turley and appended to this letter (Appendix 1).

**Design**

On behalf of the Council, Place Services provided comments on the application and subsequent meetings have taken place with Peter Dawson, Ryan Mills of Place Services, and the Council's Planning Officers. Ryan Mills submitted comments on 20<sup>th</sup> July 2022 regarding the landscape matters and Peter Dawson submitted comments in respect of the urban design/architectural matters on 1<sup>st</sup> September 2022.

IM Properties and their architect, SGP have updated the DAS, RMDG and detail Elevation Plan in response to comments made by Place Services regarding the cladding strategy to DSV's proposed building (Unit 1). The updated information presents a more cohesive language that links the cladding strategy proposed in the RMDG for Plots 2 and 3 with Plot 1/DSV. Additionally, the cladding strategy to DSV has been amended to reduce the visual impact on the northwest corner of the building. Section 9.10 in the updated DAS clarifies the design evolution of Unit 1/DSV. All images/CGI's detailing the elevation have been updated to incorporate the new cladding strategy (and a new figure added – i.e. figures 36 and 37 – to show a comparison image). The graphics in the DAS have also

been updated to clearly communicate the pedestrian, cycle access strategy and connectivity into Titchmarsh.

Section 9.11 of the DAS has been updated to provide further justification in relation to the colour choice for the ancillary office. It was generally agreed during engagement with Place Services on 21st October 2022 that the colour was acceptable from a visual impact perspective.

An updated Elevation Plan (Ref. 19-282-SGP-01- ZZ-DR-A- 131300) has been submitted to detail the amended cladding strategy. This plan supersedes elevation plan (Ref. 19-282-SGP-01-ZZ-D R-A-131300) which was originally submitted as part of the planning application.

## **Landscape**

Following the receipt of comments from Place Services and the meetings which took place with the Council and Place Services on 21st October 2022 and 30th November 2022, the following additional and amended information has been prepared by Nicholsons Lockhart Garratt in respect of landscape and visual impact:

- **ECA Colour Justification Document:** This is a new piece of work in response to a request by Place Services to provide a justification for the colour schemes set out in the DAS and RMDG based upon an analysis of viewpoints. Through discussion with numerous design and architecture specialists and key stakeholders the use of grey tones has been found to be the most appropriate approach for the cladding on large format buildings by IM Properties. Colour banding, with darker shades at lower levels to add gravitas to the base of the building, and lighter colours at higher elevations were also agreed as an appropriate strategy.
- **Updated Landscape ES Chapter and Landscape and Visual Impact Assessment:** These documents have been changed in agreement with Place Services following their review by Ryan Mills. The changes relate to a small number of changes to the nature of the impacts upon Viewpoints 5, 11 and 12. The changes are minor and do not alter the overall conclusions.

## **Ecology**

The Council's Ecologist raised concerns in respect of the removal of the Site's internal hedgerows and the potential impact on foraging and commuting bats. As such, additional transect maps displaying bat usage along hedgerows, prepared by Middlemarch as part of the pre-submission surveys, are included within Section 7 of the updated Bat Activity Survey report (Rev C). This is contained with the Environmental Statement (Volume 2, Appendix 12.6).

## **Highways**

IM Properties Highways Consultant (DTA) have prepared a note to respond to Peterborough City Council's (PCC) consultation response dated 14th July 2022. PCC have commented that the Transport Assessment Study Area should be enlarged to include a specific assessment of the effects of the forecast additional traffic on A1(M) Junction 17.

DTA are undertaking joint transport work with Lawrence Walker Ltd who are the appointed transport consultants for planning application NE/2022/00151/FUL for land east of Halden's Parkway on behalf of Newlands, for which an identical response has been received from PCC.

The scope and approach of the Transport Assessment (TA) submitted in support of Thrapston Business Park has been agreed with NNC Highways and National Highways. In addition, DTA has concluded, as set out in the response to PCC, that the request for expanding the scope of the TA Study Area is disproportionate and unnecessary.

DTA are continuing to engage in proactive discussions with both the Council and National Highways. A TA addendum will be submitted in the next few months which will include the findings from the further sensitivity assessment work which is being undertaken using the Northamptonshire Strategic Transport Model ("NSTM"). It is anticipated that this will be subject to a separate consultation once completed and formally submitted.

### **Noise**

The updated Noise and Vibration ES Chapter and supporting Appendix 8.5 Operational Noise Assessment responds to requests/ clarification on the potential mitigation solutions and provision of technical modelling/ data to demonstrate its effectiveness. Consideration is given to Plot 1/ DSV coming forward in isolation. In addition, a referencing error within the 'traffic datasheet' which assigned all future traffic including background growth to the proposed development has been corrected and the conclusion updated to show a reduced effect on noise sensitive receptors.

### **Cumulative Assessment - ES Information**

As a consequence of the changes made to ES documents (Landscape/ Noise) ES Assessment of Cumulative Effects has been updated (alongside the Summary of ES and NTS).

We trust the enclosed submission addresses a number of outstanding queries contained within the respective statutory consultee responses received to date in respect of the planning application for Thrapston Business Park (Ref. NE/22/00698/OUT). In the meantime, if you require any further information, or wish to discuss any aspect in greater detail, please do not hesitate to contact Charlotte Cook, Mark Sitch or me.

Yours sincerely,

**STEPHENIE HAWKINS**  
Planning Associate Director

## **Appendix 1 – Updated Environmental Statement Covering Letter (prepared by Turley)**

TOWN PLANNING  
MASTERPLANNING & URBAN DESIGN  
ARCHITECTURE  
LANDSCAPE PLANNING & DESIGN  
SUSTAINABLE VALUE

INFRASTRUCTURE & ENVIRONMENTAL PLANNING  
HERITAGE  
GRAPHIC COMMUNICATION  
COMMUNICATIONS & ENGAGEMENT  
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16 December 2022

**Delivered by email and post**

Paul Bland  
North Northamptonshire Council  
Cedar Drive  
Thrapston  
Northamptonshire  
NN14 4LZ

Ref: IM Z3002

Dear Paul

## **THRAPSTON BUSINESS PARK (REF: NE/22/00698/OUT): ENVIRONMENTAL STATEMENT – SUBMISSION OF SUPPLEMENTARY INFORMATION**

We write on behalf of IM Properties Ltd (The 'Applicant') with respect to Thrapston Business Park (planning reference: NE/22/00698/OUT) hereafter referred to as the 'Application'. This letter has been prepared to accompany supplementary information being submitted during the determination of the Application.

The Application was supported by an Environmental Statement (ES), undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 'EIA Regulations'). The supporting ES was submitted with the Application in May this year (the 'May 2022 ES'). This letter should be read in conjunction with the May 2022 ES.

The Application and supporting ES has been subject to consultation as part of the statutory planning determination process. Through the consultation process a number of technical clarifications have been requested / sought by technical officers at North Northamptonshire Council (NNC). The Applicant and appointed technical consultant team have engaged with the relevant officers to address their comments. The clarifications are summarised below.

The NNC Environmental Health Officer (EHO) has requested / sought clarification on the testing of potential mitigation solutions outlined within the ES and the provision of technical modelling / data to demonstrate its effectiveness. Furthermore, it was requested that an assessment of Plot 1 coming forward in isolation was provided<sup>1</sup>. As such, **Volume 1, Chapter 8: Noise and Vibration** has been updated to reference both the testing of mitigation, and the effect of Plot 1 coming forward in isolation. Further technical detail on both points is provided within a revised **Volume 2, Appendix 8.5: Operational Noise Assessment** with **Volume 1, Chapter 8: Noise and Vibration** setting out an assessment of the worst-case

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<sup>1</sup> The ES tested a worst-case scenario of the Proposed Scheme being fully operational.

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scenario (i.e. the entire Proposed Scheme coming forward). These documents are submitted alongside this letter.

NNC landscape officers have requested / sought clarification on the conclusions of level of effects reached for a number of viewpoints at the operational stage, where a neutral effect had been determined as part of the submitted ES. As a result, a number of small amendments to the technical assessment within **Volume 1, Chapter 9: Landscape and Visual**, and accompanying **Volume 2, Appendix 9.1: Landscape and Visual Impact Assessment**, have been made to reflect the discussions with NNC landscape officers.

NNC Ecological officers have requested that Bat transect result maps were produced for the survey works completed between Spring 2021 and Autumn 2021, submitted as **Volume 2, Appendix 12.6 Bat Activity Surveys**. As such, **Volume 2, Appendix 12.6: Bat Activity Surveys** has been updated to include the additional mapping requested. There are no implications on the baseline, assessment results or mitigation set out within **Volume 1, Chapter 12: Biodiversity**.

Furthermore, since submission of the Application and the ES and outside of the engagement with NNC officers outlined above, a referencing error within a 'traffic datasheet'<sup>2</sup> has been identified. This referencing error relates to predicted 8 hour night-time and 18 hour daytime traffic flow data<sup>3</sup>, within the future year (2028), used to inform the assessment of operational traffic within **Volume 1, Chapter 8: Noise and Vibration**. The error incorrectly assigned all future traffic (i.e. including background growth) to the Proposed Scheme, thereby effectively doubling the overall traffic flows on a number of road links. Following the identification of the error, a review of all other traffic data has been undertaken by the appointed transport consultant (David Tucker Associates), which confirmed there are no further errors.

Given this, the assessment of operational traffic within **Volume 1, Chapter 8: Noise and Vibration** and supporting information / data in **Volume 2, Appendix 8.5: Operational Noise Assessment** has been updated.

In summary, the revised traffic data and subsequent amendments to **Volume 1, Chapter 8: Noise and Vibration** has resulted in changes to the conclusion of the level of effect and significance for noise sensitive receptors along the two road links – the A605 North of Huntingdon Road and A605 North of A14. The revised assessment identifies that the level of effects and significance on these road links has reduced from 'moderate adverse and significant' to 'no worse than minor adverse and not significant', thereby reducing the number of links experiencing adverse significant effects associated with the operational stage of the Proposed Scheme.

As a consequence of the changes set out above, **Volume 1, Chapter 17: Assessment of Cumulative Effects**, **Volume 1, Chapter 18: Summary of Environmental Statement** and **Volume 4 Non-Technical Summary** have been updated to reflect the changes, to ensure consistency across the ES as a whole. No further elements of the ES have needed to be amended.

All updates to the ES are set out below for ease.

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<sup>2</sup> This is an internal data sheet (often excel) prepared by the appointed transport consultant and provided to relevant technical consultants who require data pertaining to operational traffic generated by the proposed scheme.

<sup>3</sup> For both Heavy Goods Vehicles (HGV) and Light Goods Vehicles (LGV).

## Volume 1, Chapter 8: Noise and Vibration

- Paragraph 8.171 has been added to reflect reference to Appendix 8.5, which details the testing of mitigation and of Plot 1 operating in isolation.
- Paragraph 8.194 (formerly 8.193) has removed reference to 2 Park Farm Court;
- Paragraph 8.195 (formerly 8.194) has included reference to 2 Park Farm Court;
- Paragraph 8.207 (formerly 8.206) has been updated to include reference to Appendix 8.5 and its content;
- Table 8.18 has been updated to reflect the revised operational daytime traffic noise levels for the year of full opening with the Proposed Scheme (2028) scenario<sup>4</sup>;
- Paragraph 8.221 has been updated to reflect that the changes in noise levels along all roads are less than the +3dB critical value for short-term impacts and thus present a minor adverse effect;
- The removal of Paragraphs 8.222 – 8.224 of the original ES because of the above;
- Table 8.19 has been updated to reflect the revised operational night-time traffic noise levels for the year of full opening with the Proposed Scheme (2028) scenario<sup>5</sup> and the table titled amended to reflect the noise levels being 8 hour values, not 1 hour values;
- Paragraph 8.224 (formerly 8.227) has been updated to reflect that the changes in road traffic noise levels along all roads except Oundle Road, which is dealt with in a later paragraph, are less than the 3dB critical value for short-term impacts and thus present a minor adverse effect;
- The removal of Paragraphs 8.228 – 8.230 of the original ES because of the above;
- Amendments to Paragraph 8.227 (formerly 8.233) to reflect a smaller increase in predicted noise levels on Oundle Road at night (from +5.0dB to +3.9dB), this consequently reduces the previously identified ‘large’ magnitude of change to a ‘medium’ magnitude of change;
- Paragraph 8.258 (formerly 8.264) has been amended to reflect the above adjustment to magnitude of change; and
- Paragraphs 8.264 – 8.265 (formerly 8.270 – 8.271) and Table 8.21, both of which summarise the residual effects, have been amended to reflect the changes set out above.

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<sup>4</sup> The following road links within Table 8.18 are unchanged from the original chapter: Huntingdon Road West of Site; Haldens Parkway; Huntingdon Road West of A605; Kettering Road East of A6116; and A6116 North of Kettering Road.

<sup>5</sup> The following road links within Table 8.19 are unchanged from the original chapter: Huntingdon Road West of Site; Huntingdon Road East of A605; and Kettering Road East of A6116.



An updated version of **Volume 2, Appendix 8.5: Operational Noise Assessment** has been provided. Changes within the Appendix relate to traffic flows on road links for the 2028 and 2043 scenarios, and noise level changes for the 2043 scenario. Furthermore, details of potential mitigation and its testing has been added, alongside the noise assessment of Plot 1 coming forward in isolation.

## **Volume 2, Chapter 9: Landscape and Visual**

- Table 9.12 updated to reflect changes to nature of effect for Viewpoint 5, Viewpoint 11, Viewpoint 12, which have all changed from Neutral to Adverse;
- Paragraph 9.122 has been updated to include reference to Viewpoint 5;
- Table 9.13 has been updated to reflect **Volume 2, Appendix 9.1: Landscape and Visual Impact Assessment**; and
- Updates to Table 9.14 to reflect the above aspects.

## **Volume 1, Chapter 17: Assessment of Cumulative Effects**

All changes to this Chapter have been to reflect the revision to the conclusions set out within **Volume 1, Chapter 8: Noise and Vibration** and the rerunning of models, that made use of traffic data and informed the assessment of in-combination noise effects. As well as the minor amendments to conclusions regarding viewpoints set out within **Volume 1, Chapter 9: Landscape and Visual**.

- Table 17.4 has been updated to account for changes to the Landscape and Visual summary of effects to reflect changes set out for **Chapter 9: Landscape and Visual**;
- Table 17.4, table note (a) has been amended to reflect that moderate adverse effects were only evident at Oundle Road at night-time;
- Table 17.4, conclusions of effects for changes to visual amenity and character have been updated to reflect changes in a number of viewpoints from neutral to adverse (as per above). This has included moving table note (b) to the 'adverse' effects to reflect to change in Viewpoint 12 which is no longer Neutral;
- Table 17.5, operational traffic noise noted for residential properties to the west of the A605 has been changed from 'moderate adverse' to 'no worse than minor adverse';
- Table 17.5 has been updated to account for changes to conclusion for Viewpoint 5, which has altered from Neutral to Adverse;
- Paragraph 17.66 has been amended to remove reference to the A605 North of the A14 when evaluating a change in-combination with Approved Project 2 – Haldens Parkway;
- The removal of Paragraph 17.68 of the original ES chapter due to changes of conclusions on the A605 North of the A14;
- Amendments to Paragraph 17.70 (formerly 17.71) to reflect no predicted in-combination effects with Approved Project 2 – Halden's Parkway, that would be greater than the effects identified for the Proposed Scheme in isolation;
- Table 17.6 has been updated to account for changes to conclusions for Viewpoints 5 and the corresponding viewpoints assessed by Approved Project 2;

- Updates to Table 17.9, which summarise the in-combination effects assessment, to reflect the above changes to conclusions in relation to **Volume 1, Chapter 8: Noise and Vibration**;
- Update to Paragraph 17.133 (formerly 17.134) to remove reference to Noise and Vibration having an in-combination effect greater than the Proposed Scheme in isolation; and
- Removal of Paragraph 17.135 of the original ES in line with the above.

### **Volume 1, Chapter 18: Summary of Environmental Statement**

Amendments to this Chapter have been made to reflect the changes / updates in Volume 1, **Chapter 8: Noise and Vibration**, **Volume 1, Chapter 9: Landscape and Visual** and **Volume 1, Chapter 17: Assessment of Cumulative Effects**.

- Table 18.2 and Paragraph 18.7 (Bullet 1) have been updated to reflect changes to level of effect and significance identified through the revised **Volume 1, Chapter 8: Noise and Vibration**;
- Table 18.2 and Paragraph 18.7 have been updated to reflect changes from neutral to adverse effects identified through the revised **Volume 1, Chapter 9: Landscape and Visual**; and
- Table 18.4 and Paragraph 18.12, which summarise the in-combination appraisal, have been updated to reflect changes identified to Table 17.9 and Paragraphs 17.133 identified above.

### **Volume 4: Non-Technical Summary**

This document provides a non-technical summary of the assessments presented within Volume 1 of the ES and therefore has been amended to reflect all changed noted above.

- Paragraph 5.6 has been updated to reflect the change in Viewpoint 12 from neutral to adverse;
- Paragraphs 5.37 and 5.38 have been updated to reflect the revised outputs of the noise assessment;
- Amendments to the summary of in-combination effects (Paragraph 6.13 onwards) to reflect changes to Table 17.9;
- Paragraph 5.51 has been updated to reflect the changing of Viewpoint 12 from neutral to adverse; and
- Table 5.1 has been updated to correspond with Table 9.14.

### **Summary**

In summary, through engagement with NNC technical officers clarifications were requested / sought in relation to Noise and Vibration, Landscape and Visual and Biodiversity. In responding to the clarifications, there have been minor updates / amendments to **Volume 1, Chapter 8. Noise and Vibration** and **Volume 1, Chapter 9. Landscape and Visual** (and corresponding technical appendices) to reflect the outcomes of discussions.

The principal amendments have been within **Volume 1, Chapter 9. Landscape and Visual** where a number of conclusions relating to changes to visual amenity and character during the operational stage have been changed from 'neutral' to 'adverse' effects. However, there are no changes to the conclusions of significance.

An updated **Appendix 12.6 Bat Activity Survey** has been produced to include additional mapping at the request of NNC. In terms of biodiversity, no changes to the ES Chapter have been necessary.

In terms of the amended traffic flows, this has resulted in changes to the assessment of operational traffic noise and ultimately amending the conclusions on the level of effect and significance on a number of road links (i.e. where two road links were previously experiencing a significant effect, this is no longer the case).

Amendments to the assessments have had consequential changes to other elements of the ES where the conclusions of the noise and vibration and landscape and visual assessment have been used to inform further assessment (i.e., **Volume 1, Chapter 17 Assessment of Cumulative Effects, Volume 1, Chapter 18 Summary of Environmental Statement** and **Volume 4, Non-technical Summary**) .

The following ES Chapters/documents have been provided and replace those submitted as part of the May 2022 ES:

- **Environmental Statement Volume 1: Chapter 8 Noise and Vibration;**
- **Environmental Statement Volume 1: Chapter 9 Landscape and Visual;**
- **Environmental Statement Volume 1: Chapter 17 Assessment of Cumulative Effects;**
- **Environmental Statement Volume 1: Chapter 18 Summary of Environmental Statement;**
- **Environmental Statement Volume 2: Appendix 8.5 Operational Noise Assessment;**
- **Environmental Statement Volume 2: Appendix 9.1 Landscape and Visual Assessment;**
- **Environmental Statement Volume 2: Appendix 12.6 Bat Activity Surveys;** and
- **Environmental Statement Volume 4: Non-technical Summary.**

I trust that this letter has been useful in providing clarity on a number of matters. Should you wish to discuss any of the above then please feel free to contact me on the details provided below.

Yours sincerely



Michael Browne  
**Associate Director, EIA**

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