

PLANNING COMMUNITIES EXECUTIVE ADVISORY PANEL Wednesday 15th November 2023

Report Title	Kettering Energy Park: Draft Masterplan Document
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Appendix A – Joint Core Strategy Policy 26: Renewable and Low Carbon Energy (including Land at Burton Wold)

Appendix B – Open Letter

Appendix C- North Northamptonshire - vacant strategic warehouses (2023)

1. Purpose of Report

- 1.1. To inform Members of the feedback received relating to consultation held on the Draft Masterplan Document for Kettering Energy Park (including proposed amendments and suggested areas of further work). This report also asks that Members consider the next steps in progression of the Masterplan.

2. Executive Summary

- 2.1. The Joint Core Strategy (JCS) recognises green industries as a sectoral priority to support economic growth in North Northamptonshire¹ and for the role they have in securing resilience to climate change and long-term energy security. It also recognises the need for North Northamptonshire to become more self-reliant and resilient, with the generation of a significant proportion of its own energy requirements from renewable sources identified as a key factor in achieving these aims.
- 2.2. To help facilitate these aims, JCS Policy 26 (Renewable and Low Carbon Energy) outlines that proposals for sensitively located development will be

¹ JCS Policy 22: Delivering Economic Prosperity

supported subject to it being demonstrated these meet a number of specific criteria (see Appendix A).

- 2.3. As part of the strategic aims outlined at paragraph 2.1 above, the JCS also outlines the potential for the co-location of renewable and low carbon technologies at “Energy Parks”, with these considered to have the greatest potential in locations where energy generators are:
 - (a) already in operation, the necessary infrastructure exists or can be provided;
 - (b) are close to existing or proposed major users of energy; and
 - (c) where adverse impacts of development can be satisfactorily mitigated.
- 2.4 In this regard, the JCS considers Kettering Energy Park (also referred to as “Land at Burton Wold”) as the main area of opportunity for such future development due to the existing wind farm already in operation and consents for solar.
- 2.5 JCS Policy 26 goes on to provide the basis for interested parties to bring an Energy Park forward at Burton Wold. To do so it outlines that preparation of a comprehensive masterplan is required, prepared in consultation with the local community and stakeholders, which will:
 1. Define development boundaries and also the renewable/low carbon technologies and land uses to be developed on the site;
 2. Make provision for a mix of complementary employment uses to facilitate development of local knowledge, expertise and research and development;
 3. Demonstrate how the proposal will contribute towards meeting the energy needs of existing and planned development, including East Kettering SUE, strategic development at Junction 10 of the A14 and employment uses associated with the site;
 4. Create a model for zero carbon energy through the installation of exemplary energy efficiency standards in buildings which use energy produced on-site in their operation.
- 2.6 Building upon the provisions outlined above, First Renewable Developments Ltd are promoting an Energy Park at Burton Wold through a Draft Masterplan Document which outlines a potential future for the site. A report focussing on the conformity of the Draft Masterplan Document with JCS Policy 26 was previously taken to PCEAP on 27th March 2023 for endorsement ahead of a 7-week public consultation. Despite this report raising some concerns with elements of the proposals, which were similarly shared by Members at the meeting, the document was endorsed for consultation on the basis responses to this would be reported back to PCEAP and cover proposed amendments including any new evidence presented through this consultation. Doing so will enable Members of the EAP to consider feedback raised through consultation, including proposed amendments, and guide the site promoters in finalising the Draft Masterplan Document ahead of submission to Planning Committee (North) where it will be considered for approval. Once approved, the Draft

Masterplan Document will be used to inform future planning applications for the site.

- 2.7 If approved, the Draft Masterplan Document will confirm the Council's support for the vision for consultation it sets out but will not pre-judge the consideration of detailed matters at the planning application stage, including the proposed mix of employment uses.

3. Recommendation

- 3.1 That Members of the Planning Communities Executive Advisory Panel (PCEAP):
- a) Consider the content of this report including the amendments/ further work proposed within it; and
 - b) Provide feedback to enable the site promoters to finalise the Draft Masterplan Document ahead of next steps in the process.
- 3.2 Next steps will entail the promoters preparing an amended Masterplan in light of the results of consultation, and subsequent discussions at PCEAP, for submission to, and determination by, Planning Committee (North).

Reason for recommendations

- 3.3 Member feedback on the Draft Masterplan Document will provide the site promoters direction on those areas of the document where consultation feedback (from both the public and stakeholders), alongside officer comments, has facilitated suggested changes which look to address issues raised, including conformity with local planning policy.
- 3.4 Council approval of the Draft Masterplan Document (as informed by public consultation), is a necessary milestone to be achieved before it will consider a future planning application for the site. Even then, as outlined at paragraph 6.1 of the previous report taken to PCEAP on 27th March 2023, whilst the Council may ultimately sign up to the Vision provided by the Masterplan, doing so does not pre-judge determination of applications or other considerations in preparing the North Northamptonshire Local Plan.

4. Background and Context

- 4.1 A report² was previously taken to Planning Communities EAP on 27th March 2023 outlining the form and content of a Draft Masterplan Document prepared for the Kettering Energy Park site. This report principally focused on the conformity of the Draft Masterplan Document with the provisions of JCS Policy 26 as it relates to Kettering Energy Park (see Appendix A). In doing so, the following concerns were raised within:

² Item 12 -

<https://northnorthants.moderngov.co.uk/ieListDocuments.aspx?CId=382&MId=1506&Ver=4>

- (a) at paragraphs 5.14, 5.21, 5.22, 5.26 about the strategic scale of B8 (Storage and Distribution) being proposed at a site which has not been tested/assessed, and, significantly, is not allocated in the Joint Core Strategy for such uses³;
- (b) the lack of detail behind the distribution of the 5,500 jobs outlined as being supported through future operations at the site (paragraph 5.23);
- (c) the impact of the proposed quantum of development (including B8 floorspace) on the North Northamptonshire Local Plan (paragraph's 5.25 and 5.26).

4.2 In addition to the above concerns, this report also emphasised the need for NNC to retain the flexibility to assess future planning applications at the site in the context of other sites and the (emerging) North Northamptonshire Local Plan and that Members may wish to consider amendments to the Masterplan document as a result of responses and new evidence presented through this consultation (paragraph 5.27). It was also reemphasised that the issue of strategic scale B8 being proposed through the Draft Masterplan Document was to be addressed following consultation to help inform the future approach to employment uses on site and that whilst the Council may ultimately sign up to the Vision provided by the Masterplan, doing so does not pre-judge determination of applications or other considerations in preparing the North Northamptonshire Strategic Plan (paragraph 6.1).

4.3 Notwithstanding the above, and concerns from Members over the proposed mix of uses⁴, as well as the increase in traffic movements around the site⁵, the Draft Masterplan Document was endorsed for a 7-week public consultation⁶.

4.4 Further to this, and in line with the provisions of the report presented to the EAP on 27th March 2023, the remainder of this report will present the responses received to this 7-week public consultation on the Draft Masterplan Document and propose where amendments and/or further work could be made as a result.

5. Consultation on Draft Masterplan Document

5.1 As outlined, following the March 27th EAP meeting, a 7-week public consultation was undertaken on the Masterplan. This began on 3rd April and ended 22nd May 2023. Details of this consultation were published on the

³ As part of this the EAP Report flagged a lack of detail associated with the Cold Stores proposed (associated with proposed Hydroponic uses), meaning the scale of B8 coming forward at the site could be higher than quoted floorspace figures.

⁴ Including the amount of B8 development relative to other employment opportunities/the higher-skilled and high-tech jobs sought.

⁵ Printed Minutes: <https://northnorthants.moderngov.co.uk/documents/s18596/2.%20PCEAP%20-%20Minutes%20-%2027%20March%202023%20-%20Draft.pdf>

⁶ No changes were made to the Draft Masterplan Document following EAP or ahead of consultation.

Council's (NNC) website (both the news page⁷ and a bespoke page⁸ created for consultation purposes). The promoters, First Renewable Developments Ltd, also created their own consultation webpage⁹ where promotional material¹⁰ could be accessed alongside a bespoke feedback form produced to enable interested parties to comment on the Masterplan through responding to a set of consultation questions¹¹. To seek to maximise access to information, a link to the promoter's webpage was provided on NNC's page.

- 5.2 In order to maximise public input, NNC also sent emails direct to contacts held on both its Local Plan and Consultation Hub databases¹² to advise of this consultation and how feedback could be provided. Within these emails it was also made clear that responses could also be sent to a bespoke NNC email address where more unstructured feedback could be provided to the proposals. The consultation was also augmented through the Council's social media channels, with posts made on Twitter, Facebook and LinkedIn. Details of the consultation were also included in the Leader's Update as published on the NNC website¹³. These consultation procedures were augmented by a Public Exhibition¹⁴ held at the Harold Mason Centre in Burton Latimer on 21st April, between 2pm and 7pm, details of which were contained in the consultation emails as sent, NNC webpages and local press coverage¹⁵. This event was led by the site promoters with officers from the Council in attendance in an observatory capacity. In total, 101 attendees were recorded as attending on the day.

Consultation Feedback - Number and Form of representations

- 5.3 In total 212 responses were received to the 7-week consultation. Of these, 89 were received via the online feedback form with the remaining 123 responses returned via email. Within the latter figure, nine of these responses were also copied into to the local MPs for review and/or comment.
- 5.4 On review of these responses, it is clear that the proposals, as drafted, do not garner much local support. Specifically, c. 95%¹⁶ of responses received were

⁷ <https://www.northnorthants.gov.uk/news/have-your-say-kettering-energy-park-draft-masterplan-document>

⁸ <https://northnorthants.citizenspace.com/planning/kettering-energy-park-masterplan-consultation/>

⁹ <https://ketteringenergypark.co.uk/development-updates/>

¹⁰ This included an "Opportunities and Constraints" document which was developed with input from the Council and its consultants on areas including Heritage, Landscape, Ecology and Design.

¹¹ There were 18 consultation questions in total. These were not numbered on the Feedback Form as published but a number has been assigned to each within this report for ease of cross referencing.

¹² This included Town and Parish Councils. Between these two databases, approximately 1,500 individual emails were sent, albeit there is potential for duplicate entries between the two.

¹³ <https://www.northnorthants.gov.uk/your-council/leaders-update> (Issue 48 - 21st April 2023)

¹⁴ <https://ketteringenergypark.co.uk/public-exhibition-boards.pdf>

¹⁵ [Consultation begins on Kettering Energy Park near Burton Latimer and Finedon that could see farmland used for warehouses and businesses | Northamptonshire Telegraph \(northantstelegraph.co.uk\)](#)

¹⁶ The Feedback Form and Consultation Questions did not directly ask respondents whether they were supportive of the proposals or not so this has not been captured directly. The percentages quoted are therefore approximate and have been inferred by officers through review of each response.

not supportive of the proposals. Of the remainder, this was split between supportive responses or those which did not provide a preference either way. Included within the responses received was a petition demonstrating against the proposals which comprised 1,412 signatures at the time of receipt¹⁷.

- 5.5 In terms of where responses have been received from, it appears the majority of these were made by individuals or families who live in proximity to the site¹⁸, albeit feedback was also received from other sources including Finedon, Burton Latimer, Kettering and Thrapston Town Councils, Woodford, Cranford, Little Addington and Great Addington Parish Councils, the Northants Green Party, the CPRE and planning consultants working on behalf of landowners and developers.
- 5.6 Review of responses has also revealed that some respondents made more than one representation over the course of the consultation period with all instances of this recorded as sending feedback via both email and the feedback form. These account for 14 of the 212 responses recorded in total. It also appears that representations were made by a number of individuals belonging to the same family. Although perfectly legitimate, it should be noted that this has had the effect of increasing the total number of representations received, and, in the main, opposition to the proposals.

Post - Consultation Feedback

- 5.7 Finally, by way of an update to paragraph 5.4 above, since the formal consultation period ended a number of examples of local concern at proposal have emerged. Firstly, an e-petition was lodged with NNC on 13th August - "*Oppose Developments at Kettering Energy Park*¹⁹" (albeit only one person signed this over the 8-week period this was open). This was supplemented by a news article on BBC Northamptonshire's webpage - "*Kettering Energy Park is 'warehousing under different guise', Campaigner say*" (published 29 August 2023)²⁰. The Council is also aware of a crowdfunding campaign launched to raise £9,000 to "help fight the destruction of the countryside" with funds "raised will be spent to ensure we have the best professional legal and environmental support and to ensure that we have the best possible chance of stopping the developers plan²¹".

¹⁷ This petition ("Stop Kettering Energy Park Development in Northamptonshire") remains live and at the time of writing has recorded 2,282 signatures - <https://www.change.org/p/stop-kettering-energy-park-development-in-northamptonshire>

¹⁸ 185 of the 212 responses received (or 87%) were made by individuals not linked to any organisation or company.

¹⁹ NNC ePetition: *Oppose Developments at Kettering Energy Park*: <https://northnorthants.moderngov.co.uk/mgEPetitionDisplay.aspx?ID=20&RPID=2711923&HPID=2711923>

²⁰ <https://www.bbc.co.uk/news/uk-england-northamptonshire-66640925.amp>

²¹ This crowdfunding page ("Landscape not warehouse") remains live and at the time of writing has raised £3,102 of the £9,000 target - <https://www.justgiving.com/crowdfunding/Landscape-not-warehouse>

- 5.8 The Council has also received an ‘Open Letter’ from Finedon, Burton Latimer and Thrapston Town Councils, Cranford, Grafton Underwood, Great Addington, Little Addington, Ringstead, Woodford, Pytchley, Earls Barton, Lowick and Slipton and Barton Seagrave Parish Councils dated August 2023 (see Appendix B). This letter was sent to advise “the strength of feeling against the proposals cannot be ignored” and to express “our strong objection to the proposed development” and “the potential adverse impacts of such a large-scale project on our local environment, community and quality of life”. Within this letter an “evident lack of public support” is outlined, with the petition at paragraph 5.4 above cited as well as feedback the Town and Parish Councils have solicited through local publicity, consultation and surveys undertaken (in isolation from the formal consultation processes undertaken by the site promoter (and NNC in assistance)). Furthermore, the letter considers that the community was not adequately engaged “in the decision making process” and that “no written material was made available for adequate review and for us to consult with our constituents at that time”. The letter also raises concerns about the impacts of the proposals on the local area, including traffic, air pollution, amenity value, loss of green spaces and visual impact, amongst other issues.
- 5.9 Finally, the Council was also made aware of a “Burton Wold Development Public Information Evening” which was arranged for 9th October at Finedon Community Centre (7pm). This event was arranged in conjunction with Finedon Town Council “to fully understand the proposed development just outside of our town at Burton Wold and its impact on Finedon and surrounding area”. No Council staff were in attendance at this meeting or have been made aware of discussion points or post meeting actions.

Status of the Draft Masterplan Document

- 5.10 The principle of development at Burton Wold has already been subject to public scrutiny through the Examination (and subsequent adoption) of the Joint Core Strategy (as the strategic Part 1 Local Plan for North Northamptonshire). This is therefore not the issue for debate through the development of the Draft Masterplan Document (and subsequent consultation on it). Rather, the focus is whether the proposals within the Masterplan align with national and local planning policy and whether there are any areas within which should be subject to review on account of feedback received.
- 5.11 Further to this, through the consultation feedback received it appears that several representors have mistaken the status of the draft masterplan document and have assumed that the site has been given planning permission for development on the basis of its contents. To clarify, this is not the case. Specifically, JCS Policy 26 requires a comprehensive masterplan to be prepared in consultation with the local community and stakeholders, with this to be ultimately endorsed by NNC thereafter. Therefore, the recent consultation is considered part of the Masterplan preparation process outlined in Policy 26, with feedback from individuals, groups, organisations and other

interested parties used to develop, and/or amend, the Draft Masterplan Document accordingly. Only once agreed by the Council, in line with the provisions of JCS Policy 26, will the Masterplan come into effect and form a material consideration in the determination of planning applications for the site. Furthermore, any future planning applications will be subject to additional public consultation (including letters being sent to adjacent residents of the site), so the opportunity to comment on development proposals at the Energy Park will continue to be available.

Disclaimer

- 5.12 The remainder of this report shall now focus on the responses received to the consultation on the Draft Masterplan Document. This shall be undertaken relative to each of the 17 (thematic) questions set in the feedback form alongside Q18, which is used to capture elements of feedback which do not readily relate to the preceding set of questions. Notwithstanding this, however, please note that through review of feedback form responses it is clear that respondents have not necessarily answered every question available or, indeed, answered the specific questions put forward. Where necessary, officers have used their discretion to re-assign a response to a particular question where the feedback was considered to align more closely to the question set. Furthermore, some areas of feedback did not relate to the consultation question as set. Together these factors have led to outputs which have been extensive in some areas and limited in others and this is reflected within the remainder of this report.
- 5.13 An officer response is provided to each question in response to the issues raised in responses. Whilst this report identifies fundamental issues to resolve regarding the scale and mix of uses, the officer responses also seek to identify areas where the masterplan can be refined and enhanced.

6. Consultation Feedback

Vision

Q1. Do you have comments on the proposed concept and Vision for Kettering Energy Park? (Section 2)

- 6.1 Section 2 of the Draft Masterplan Document²² sets out the vision for the Energy Park which is underpinned by a set of principles. It commits to bringing the vision and objectives forward in conjunction with a Green Infrastructure Strategy (the Green Infrastructure and Landscape Strategy is set out in Section 9 of the Masterplan). The Masterplan included the following vision:

²² Hereafter referred to as the “Masterplan” for brevity.

“To create a sustainable development based around renewable energy, where energy generation matches or exceeds demand from adjacent energy intensive uses. The Energy Park will provide a catalyst for new investment within North Northamptonshire and will be based on principles of sustainability to minimise the impacts of development and support low carbon development that will contribute to the future economy.”

- 6.2 The vision has been developed in consultation with the Council and other interested parties.
- 6.3 There were several comments which supported the concept of the Energy Park. Positives of the concept which were highlighted included that it would be an opportunity for Kettering to grow and thrive in the future, that it would put Northamptonshire on the map for innovation, it would be good for the environment and the area and would be good for local jobs. Kettering Town Council welcomed the introduction of new renewable energy provision and the use of the energy to power new development in the immediate vicinity. They also welcomed the prospect of new jobs, particularly ‘green collar’ jobs.
- 6.4 Other comments were in favour of the concept but raised issues such as the suitability of the location, whether the proposal would transfer into reality, whether aspects such as reducing the visual impact would be possible or felt more could have been done.
- 6.5 One representor highlighted a need for a specific change to the vision to ensure the proposals respect the context in which the Energy Park is situated and are complementary to the character and sensitivities of the surrounding area. Reference was made to the need to consider Woodford House (Grade II Listed) and the surrounding environment as well as the Round House, (also Grade II Listed).
- 6.6 A number of respondents supported the concept of an Energy Park based on green energy/ low carbon/ renewable energy but not the inclusion of warehousing. Reference was made to the use of green energy/ energy park as terms to disguise another large warehousing development (“greenwash” / “greenwashing”). Some respondents made reference to the site being a net importer of energy and that the commitment to self-sustaining energy was weak. The North Northants Green Party considered that while the Energy Park seems to tick all the right boxes with regard to development powered by renewable energy, the destruction of countryside, loss of agricultural land and huge increase in traffic and resulting emissions is not a price residents should pay, particularly those directly affected.
- 6.7 It was highlighted that the Vision only identifies the ‘potential’ for hydroponics which is the only agricultural use proposed in the document.
- 6.8 It was suggested that the Vision and Principles should be updated to include reference to local knowledge, expertise and research and development to ensure that the masterplan meets to requirements of Policy 26 of the JCS and

does not become an alternative location for employment outside these target users.

- 6.9 Place Services (the Council's retained consultant on matters including design, heritage and landscape) considered the reference to a "pleasant" landscape setting should be replaced by "sympathetic".
- 6.10 The Environment Agency (EA) considered that the vision should reflect the NPPF requirement to adopt proactive strategies to mitigate and adapt to climate change and that while climate change is referenced in the Principles, it is of such importance it should be in the Vision itself. The EA also considered that reference should be made in the masterplan to the Oxford-Cambridge Pan-Regional Partnership and the ambitions of the Masterplan should reflect the partnership's strategic ambition to be 'one of the most prosperous, innovative and sustainable economic areas in the world'. The EA also considered that the Integrated Water Management Framework, Local Natural Capital Plan, River Ise Partnership and River Ise Strategic Plan should also be referenced in the masterplan. Finally, the EA also note that the Green Infrastructure Strategy, as listed in the final bullet point of the Vision, as securing a minimum biodiversity net gain of 10% and consider that this should be increased.
- 6.11 Historic England welcomed the reference to history within the Vision but considered it would be helpful to also include reference to 'heritage assets and their settings' here.
- 6.12 The majority of comments received on the Vision did not support the provision of Kettering Energy Park. Some respondents felt the development is unnecessary or strongly objected to the proposal, others highlighted the constant development in the area and that the area had had enough development already. There were also comments about the suitability of the name (as the site is not located in either Kettering and Kettering Borough Council no longer exists) and also the rationale for the scheme boundary extending to Cranford.
- 6.13 Many respondents highlighted specific issues, many of which are more relevant to other consultation questions. These are as summarised below.
- 6.14 Landscape, loss of open countryside, loss of agricultural land, local character/ history, wildlife: A number of respondents raised concerns regarding the destruction and loss of countryside/ open spaces. It was highlighted that this land is used for walking and enjoying the countryside and to improve mental health. Respondents raised that many open spaces around Burton Latimer have already been lost, that this land has always been farmed and it would be more eco-friendly to leave it as open space. Due to its location on the top of the Wold, large buildings were considered to be unsuitable. Respondents considered it is a waste of agricultural land, resulting in loss of land for food production, and considered it would be better to install solar panels on warehouse roofs rather than arable land. It was also raised that the proposals

are not sympathetic to local character, history or the surrounding built environment and that the scenery contains long range views and modern windmills, striking a mix of local character and green technology. Reference was made to the Round House and its story, which is linked to the surrounding landscape and its resemblance to Waterloo. Several respondents considered the proposals would devastate wildlife and reference was made to ecosystems not having recovered from the Kettering gateway development. One respondent did consider that the plan was well thought out to include future requirements for the environment and wildlife. Reference was also made to the issue of disused mine shafts collapsing.

- 6.15 Warehousing: There was significant objection to the inclusion of warehousing. Issues raised included that it is not needed, there are already too many warehouses in the area (including empty warehouses), there is no evidence to justify more warehouses and more diverse jobs are needed. It was raised that most employees would live outside the area and that 70% warehousing would not bring the quality of jobs people need. It was also considered that warehouses would be a blot on the landscape and would bring few jobs for the landscape destroyed. The number of warehouses and industrial sites on the outskirts of Burton Latimer was also raised and it was highlighted that the cumulative impact of similar warehouse developments within 30 miles had not been adequately addressed. It was suggested land near the M1 or railway freight lines would be more appropriate.
- 6.16 Traffic, air pollution: A significant number of respondents raised concerns relating to traffic. This included that local road infrastructure is already congested and cannot cope with the amount of traffic which would be generated by 5,500 people travelling to work. Concern was also raised over the number of potholes caused by heavy traffic, the impact on the Round House and the impact of additional traffic on cycling along these routes. A number of respondents also raised concerns about the impact on roads within and around Finedon and the impact of traffic, noise and air pollution on quality of life. The A510, A6 roundabout in Finedon and Wellingborough Road were identified as areas of particular concern in this respect. Concern was also raised about traffic travelling through surrounding villages to avoid the A14 and through Burton Latimer. The capacity of Junction 11 of the A14 was also raised. The need for a transport assessment was highlighted. The suitability of the Sustainable Transport Strategy's offer was also raised, and it was questioned how many employees are likely to have electric cars.

Q1 - Officer response and recommendations

- 6.17 As outlined above, many of the comments received to this question relate to the principle of development of an Energy Park at Burton Wold which has already been considered through the preparation of the Joint Core Strategy. However, a number of specific issues were also raised, including landscape impact, warehousing and traffic which are considered in more detail in the following sections.

6.18 Several respondents suggested amendments to the vision. It is recommended that discussions take place with the site promoters to discuss incorporating the following changes into the vision or underpinning principles:

- The addition of wording within the Principles to ensure the development respects and is complementary to the character of the surrounding area (bullet point 11 may be a suitable place to make this amendment).
- The addition of wording to the Vision or Principles to include reference to local knowledge, expertise and research and development to ensure a closer link with the requirements of JCS Policy 26 (bullet point 7 may be a suitable place).
- The addition of wording to the Vision to make reference to responding to climate change. This could potentially be added to the second sentence of the Vision.
- The addition of the wording proposed by Historic England, to include reference to ‘heritage assets and their settings’.
- The removal of the words ‘potential for’ in relation to hydroponics in the Key Principles of the Energy Park.
- Replacement of reference to “pleasant” (landscape setting) with “sympathetic”.

6.19 It is also recommended that the documents suggested for inclusion by the Environment Agency are reviewed and referenced in the Masterplan, where appropriate.

Environment and Biodiversity

Q2. Do you have comments on the proposed approach to Green Infrastructure and Landscape Strategy? (Section 9)

7.1 Section 9 of the Masterplan sets out the Green Infrastructure and Landscape Strategy. This has been informed by a Green Infrastructure Strategy prepared for the site which provided a design guide to feed into the masterplanning process. The strategy set out in the Masterplan is based on utilising existing site features as a basis for developing a strong landscape setting for the development, enhancing biodiversity and ecological connectivity across the site and opening up a network of amenity routes and green corridors.

7.2 There was some support for the approach to green infrastructure. Benefits identified included that the green spaces and planting would create a pleasant working environment and that improvements to land previously quarried and mined for ironstone and limestone would benefit the local community. One respondent welcomed the wooded edge to soften views but without details regarding the height and type of woodland remained concerned about the visual impact and considered greater reference should be made to the wider character area including Woodford House, in the Masterplan. One respondent considered there is no Green Infrastructure.

- 7.3 The Environment Agency considered that statements included within the masterplan should reflect the ambitions of the ‘Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc²³’.
- 7.4 The Wildlife Trust responded that given that the proposal is an Energy Park and is marketed with some ‘green’ credentials, it recommends that the proposal should also include a Natural Capital Assessment which is then used to guide the green infrastructure and landscape strategy, particularly as this approach has already been undertaken for other proposals within the county and considers a range of aspects to better assess the wider impacts and opportunities of a proposal (to enable a wider analysis in this respect).
- 7.5 Natural England advised that it seeks to ensure adequate provision of high-quality Green Infrastructure (GI) to enhance the urban and rural environment through connected multi-functional GI that delivers multiple benefits to people and wildlife (amongst other aims and aspirations). To this effect, Natural England welcomed the provision of a GI Strategy Plan in the Masterplan. In doing so Natural England also recommended consideration is given to its various tools and guidance including a set of GI principles which provide a baseline to develop stronger GI policy and delivery and that this should be referred to in order to ensure GI is multifunctional, connected and strategically planned.
- 7.6 The majority of respondents commented more generally on the negative impacts of the proposals on green space, biodiversity and landscape rather than specifically about the proposed approach to green infrastructure and the landscape strategy.
- 7.7 A number of respondents considered that the proposals would have a negative impact on biodiversity, would destroy habitats and would not be good for the environment. It was considered that large developments have a significant impact through destruction of habitats, removal of trees and removal of other natural features which decrease biodiversity. The number of other developments in the area which also threaten habitats and wildlife was also raised. It was considered no assessment of ecology has been undertaken nor mitigation measures identified.
- 7.8 A number of comments specifically highlighted the loss of hedgerows and woodland, with a figure of 20km of lost hedgerow being referred to²⁴. Feedback considered that the importance of the hedgerows had been downplayed and highlighted that many of the hedgerows are of a historic nature, the removal of which would be precluded by the Hedgerow Regulations (1997). It was also considered that hedgerows must be protected and enhanced as new hedgerows and natural corridors will not provide the

²³ Otherwise known as the “Arc Environment Principles”

²⁴ This reference appears to have been derived from the analysis contained within the Petition outlined at Footnote 17.

same level of biodiversity. The role of hedgerows as a key carbon sink was also highlighted.

- 7.9 Respondents also raised that the loss of open countryside/ farmland is not “green” and that building warehouses would have a negative impact on biodiversity. A number of comments considered that the area is rich in biodiversity, animal habitats and ecosystems, including protected species, which would be destroyed. It was also highlighted the site is one of few areas in Northamptonshire not crossed by roads or villages and therefore represents a large area of mature open countryside. The ecological impact of proposals on the surrounding area was also raised, with reference made to impact on Stanwick Lakes, the Nene Valley wetlands, Twywell Hills and Dales and Cranford St John SSSI.
- 7.10 The impact of noise, traffic, air and light pollution on wildlife was also raised. Questions were raised about how many trees would be lost and when environmental assessments which set out mitigation measures would be available. The commitment the Council has made to the preservation of countryside and wildlife was also highlighted. Specifically, reference was made to Corporate Plan priority 4 ‘protect the countryside and open spaces and enhance the natural environment and ecology’. Cranford Parish Council considered NNC should deliver on this priority.
- 7.11 Concern was also raised over the adequacy of replacement habitats and the time it takes for these to establish. There was also concern about the short to medium term impact while screening and habitat is established.
- 7.12 Comments referred to the lack of reference to, and/ or compliance with, the National Biodiversity Network, Northamptonshire Biodiversity SPD, Upper Nene Valley Gravel Pits SPA SPD and SPA Mitigation Strategy SPD. As the development is partially within 3km and 4km of the SPA, it should be subject to specific wintering bird surveys. Natural England should be consulted to agree the scope of the surveys.
- 7.13 A number of respondents raised concerns about landscape impact. These included that the landscape strategy won’t make up for the unsightly/ intrusive buildings, that they have yet to see an industrial park which is landscape-led and that it is not possible to have low visual impact and 30m high buildings. One respondent considered that no quantity of trees or landscape buffers in front of 30m high warehouses will protect views or the rural landscape. Little Addington Parish Council considered that the proposed 30m high buildings would dominate the landscape for miles around and screening would take many years to grow to the required height.
- 7.14 A number of respondents considered that the buildings would dominate the landscape, be visible from a wide area and would be out of keeping with the surroundings on an elevated plateau. It was considered the landscape would be ruined and the development would be a blot on this. The fact the site is in the open countryside away from existing development was also raised.

- 7.15 The lack of detail on how the landscape strategy had been arrived at and mitigation requirements were also highlighted. Lack of analysis or evidence on the impact and dominance of the proposed development zone on the surrounding area was also raised. It was also considered the masterplan downplays the dominance of what is proposed and that the visibility will be far greater than set out. One respondent considered more natural landscaping needs to be incorporated.
- 7.16 It was also considered that the plans do not comply with the Northamptonshire Character Strategy and Guidelines, as Burton Wold is one of three clay plateaus and the expansive panoramic views across elevated, open areas of plateau landscape should be conserved and enhanced. The development is considered directly opposed to this in this respect.
- 7.17 It was raised that little detail is provided on landscape and visual impact but it is evident that the large buildings will be dominant features in this rural landscape and a full LVIA will demonstrate this. Woodford Parish Council considered that the masterplan would go far beyond 'low impact' as required by JCS Policy 26.
- 7.18 A number of respondents highlighted that the landscape is of historic importance, analogous to the land at Waterloo as described by the Duke of Wellington.
- 7.19 Place Services considered that Figure 8 (Green Infrastructure Strategy) should be updated to show existing green corridors and how the proposals will connect into these (and the wider Green Infrastructure network).

Q2 - Officer response and recommendations

- 7.20 The Green Infrastructure and Landscape Strategy set out in section 9 of the Masterplan has been informed by a Green Infrastructure Strategy for the site. In addition, a Strategic Visual review and Built Heritage and Archaeology Constraints and Opportunities Report have also informed the preparation of the Masterplan. Outputs from these studies have been summarised within the "Site Analysis, Opportunities & Constraints" document which was published alongside the Masterplan for consultation.
- 7.21 Many of the comments received for this question relate to the general principle of development on this site and the impact any development would have in terms of loss of open countryside and impacts on ecology and landscape rather than specific comments on the Green Infrastructure and Landscape Strategy. The approach to how the issues raised have been addressed through the preparation of the Masterplan is set out below.
- 7.22 In terms of loss of existing features and impact on ecology, the Green Infrastructure and Landscape Strategy set out in Section 9 seeks to utilise existing landscape features including hedgerows and trees to develop a strong landscape setting and to enhance biodiversity and ecological connectivity. Within the landscape strategy areas, set out at page 17 of the

masterplan, commitments are made to retaining and enhancing existing features and to the incorporation of new features and planting. The Green Infrastructure and Landscape Strategy set out in the Masterplan provides a framework to enable the detailed proposals for the site to be developed and considered through the planning application process to ensure that these issues are fully addressed.

- 7.23 In addition to the Green Infrastructure and Landscape Strategy, the approach to the biodiversity strategy is set out in Section 10 of the Masterplan which seeks to ensure that adverse effects on ecology are mitigated and sets out a framework for ensuring that the proposals deliver a measurable improvement to biodiversity through the provision of green corridors and areas for ecological enhancement.
- 7.24 In relation to the comments that no ecological assessment has been undertaken, ecological assessments have been undertaken and used to inform the Masterplan although further detailed assessment will be required as the proposals develop. On the basis of feedback received it may be beneficial for these to be more explicitly referenced in the Masterplan.
- 7.25 In terms of landscape impact, the strategy has been informed by a Strategic Visual Review. As proposals develop further landscape assessment will be required. The Masterplan provides an overarching strategy which will need to be developed in more detail as the proposals progress and to this end the promoters advise that a Landscape and Visual Landscape Assessment will be prepared to inform any future planning application at the site (alongside other relevant work including the Design Codes and Parameters Plans).
- 7.26 The Built Heritage and Archaeology Constraints and Opportunities Report considered the impact of the proposals on the Round House and Poplars Barn and set out mitigation measures to be considered in the emerging Masterplan to minimise impacts. Woodford House, which was highlighted in the responses, was outside the area of search for this document on account of its distance from the Energy Park site.
- 7.27 It is recommended that discussions take place with the site promoters to discuss incorporating the following changes:
- Inclusion of existing green corridors (and their connections to wider GI network) in Figure 8 (including an updated Key).
 - Undertaking a Natural Capital Assessment of the site, as per feedback from the Wildlife Trust, to better gauge the wider impacts and opportunities of the proposals.
 - Review of Green Infrastructure best practice tools and guidance as advised by Natural England to ensure what is delivered on site is multi-functional, connected and strategically planned.
 - A caveat regarding the height of buildings shown to ensure this is influenced by detailed landscape assessment.

- Inclusion of references to further work which will be undertaken to inform any future planning applications at the site.
- Publication of Green Infrastructure Strategy which underpins this Section of the Masterplan
- Inclusion of appropriate references to the 'Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc' as per feedback from the Environment Agency.

Q3. Do you have comments on the proposed approach to Biodiversity Net Gain? (Section 10)

- 8.1 Kettering Town Council highlighted that the provision of green infrastructure and net gain in biodiversity is essential to ensure this is not just another employment site pretending to be green. Another respondent considered that if the development is completed as planned then this appears to be a significant improvement on the current habitat, but that care would be needed during the building phase to ensure current residents and ecosystems are not polluted or disturbed.
- 8.2 Other comments on this Question were mixed. These included feedback that the area given over to biodiversity net gain was not sufficient, that 10% net gain could not be achieved, that nothing would be gained from the receptor sites (as the site is already a haven for wildlife), that the SSSI should not be used in BNG calculations, that the site was too small to attract/ retain displaced animals, that the BNG receptor should be more central to the plans and that the ambition of 10% could be improved on.
- 8.3 On the net gain figure, Cranford Parish Council consider as a 'green' project the BNG target should be at least 30% and Little Addington Parish Council considered the plans are not in line with a 10% increase in biodiversity given the size of the area to be covered with buildings and roads. The Wildlife Trust considered that the 10% figure included in the Environment Act 2021 should be seen as a minimum, with "green" proposals aiming for much higher and considers this achievable at the site given the size of the proposals. Similarly, Natural England advised it would welcome more ambition regarding the 10% figure, where feasible, with a view to ensuring the potential impacts to qualifying species of locally designated sites and functionally linked land are satisfied and provide further assurance that the measures outlined in the Masterplan would be appropriately mitigated through the mitigative habitat creation that forms part of the BNG area. In this respect Natural England also advised use of Defra Metric 4.0. The North Northants Green Party also advocated an improvement on the 10% BNG figure.
- 8.4 Linked to earlier comments the Environment Agency considered that the masterplan should reflect the 'Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc' including delivering a 20% biodiversity net gain (reflective of the Arc's world leading environmental ambitions).

- 8.5 A number of respondents considered there would be no net biodiversity gain, only losses, and that biodiversity would be reduced.
- 8.6 It was also highlighted that no metrics, analysis or evidence is provided to substantiate claims of net gain in biodiversity and that the masterplan lacks sufficient measures to mitigate adverse impacts.
- 8.7 The Environment Agency highlighted that the BNG receptor site is adjacent to Cranford closed landfill and an older landfill area within the same footprint which is unlined. In doing so it notes that the Masterplan makes no reference to these possible constraints. Further to this, the developers are recommended to confirm with SUEZ Recycling and Recovery UK Ltd. that there are no off-site monitoring points within the site master plan. EA records show there has been no previous evidence of landfill gas migration that could affect the proposed masterplan.
- 8.8 The Wildlife Trust consider that the proposed BNG receptor site, being adjacent to Cranford Meadow Potential Wildlife Site (PWS) and Cranford St John Local Wildlife Site (LWS), which is also a geological site of Special Scientific Interest (SSSI), to be a suitable location to provide BNG as it links to existing wildlife sites and the proposal suggests it would have suitable soil. However, a management plan is outlined as a key document suggested to assess this aspect of the Energy Park.
- 8.9 In respect of the area proposed for Lapwing habitat, the Wildlife Trust considers the suggested area as very small²⁵ and have concerns that it would not provide sufficient compensation for the loss of the open arable landscape that the birds are currently using. As a result, it strongly recommends that this aspect of the proposal is revised. The Wildlife Trust also highlight that Golden Plover have also been observed in the area previously and may also require consideration.
- 8.10 Feedback was also received from Natural England in respect of making provision for new areas of habitat suitable for Lapwing (and Golden Plover) within the Masterplan. Specifically, Natural England advised it is highly encouraging to see that thought has been afforded to creating new areas of habitat suitable for both Lapwing and Golden Plover, based on the key requirements for the species. This is considered important for the site to be utilised, taking into account features such as optimal viability and ongoing management to ensure the habitat remains a 'functional' wetland/grassland habitat and is isolated from disturbance (as this will form a fundamental aspect of mitigation). Natural England also advised that additional scrub and tree cover will also need to be considered in management as Lapwing habitat should retain a largely 'open' pattern.

²⁵ The Lapwing Habitat Area is shown within Section 14 (Development Boundaries) of the Draft Masterplan Document and at Section 15 (Development Zones) it is clarified that this area will be provided at the southern area of Development Zone South as part of the landscape provision (totalling 3ha in size).

- 8.11 In respect of Barbastelle Bats, the Wildlife Trust advise that planting plans need to be carefully considered to ensure that the existing commuting and foraging routes used by bats are maintained and new ones do not develop into the path of the wind turbines. On the basis Barbastelle bats being present on site, the Wildlife Trust considers that the landscape strategy will need to be specifically designed with these in mind.
- 8.12 Linked to the above, Natural England advised that the proposed development is likely to affect Bats and Great Crested Newts, or in the vicinity of the development site, through disturbance to individuals and the damage or destruction of a breeding site or resting place and advises review of its standing advice on how protected species should be dealt with including reference to its detailed species advice.

Q3 - Officer response and recommendations

- 8.13 Section 10 of the Masterplan sets out the approach to the biodiversity strategy. The BNG receptor site is currently open meadow land which has been assessed as having low ecological value. This area therefore has the potential to be enhanced to improve its biodiversity value. The site is adjacent to a geological SSSI.
- 8.14 A technical note: Biodiversity Net Gain Calculations of Energy Park Masterplan has been prepared to summarise the findings of the Biodiversity Net Gain Calculations. These calculations were based on the findings of the specific habitat survey work undertaken in 2021 to establish the initial baseline. This note concludes that BNG calculations indicate that the emerging proposals for the masterplan site would deliver a measurable net gain in biodiversity within the site boundary and that the proposals for the Masterplan site and the BNG site are capable of delivering a level of net gain which accords with the minimum 10% threshold²⁶.
- 8.15 Section 10 of the masterplan provides a framework for developing a more detailed proposal. Further assessment work will be required to support detailed proposals.
- 8.16 It is recommended that discussions take place with the site promoters to incorporate the following changes:
- The inclusion of a diagram in the biodiversity section showing the location of the BNG receptor site, lapwing habitat area and GI corridors to show the extent of the biodiversity strategy more clearly.
 - The inclusion of a commitment to a higher % of BNG, potentially through an aspirational target.
 - The inclusion of reference to 'Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc' and landfill constraints as suggested by the EA.

²⁶ This note was re-issued in January 2022 and reached the same conclusions.

- Confirmation that the landscape strategy is designed to cater for Barbastelle Bats as suggested by the Wildlife Trust. Make amendments to this if not.
- Check the potential to increase the area afforded for the purpose of Lapwing habitat, including the potential to include additional scrub and tree cover as per the suggestions made by Natural England and the Wildlife Trust.
- Recognition of the potential presence of Great Crested Newts on or in the vicinity of the site and ensure Natural England standing advice is adhered to within the appropriate evidence base documentation and/or the Masterplan itself (whichever is considered most appropriate).

Q4. Do you have comments on the proposed approach to Drainage Strategy? (Section 12)

- 9.1 One respondent considered infrastructure seemed to have been thought about and planned, including drainage and sewerage. Another highlighted the need to ensure the surrounding area can take the additional run off in a smaller area.
- 9.2 Concern was raised about the amount of development around Burton Latimer that drains into the same watercourse. It was queried whether integrated drainage had been looked at to consider the effects of all these sites under severe wet weather stress and the resulting effect on the watercourse downstream. Other respondents considered the Drainage Strategy had no detail and had not considered the potential for flash flooding and that no details had been given on treatment and discharge from the site of sewage and effluent from the buildings. It was queried whether on-site treatment works would be provided or if there is capacity in Anglian Water infrastructure.
- 9.3 Concern was raised that concreting the area would remove natural drainage and would cause issues elsewhere. Issues associated with not allowing water to follow its natural course were highlighted, including either flooding or damage caused by lack of water which could result in the destruction of water-based wildlife.
- 9.4 It was highlighted that the ground drains in an eastwards direction into the river Nene and that no explanation is provided for how the SPA will be protected from contamination. The effect on water quality in the surrounding area was also raised.
- 9.5 The Environment Agency (EA) welcomed that the drainage strategy embraces SuDS and water attenuation together with proposing a hydroponic area which will collect, store and re-use water. The EA also highlighted that the drainage section needs to be amended to reflect that the site extends into Flood Zone 3 near the boundary with Burton Road, Burton Latimer. The EA noted that this change was unlikely to cause issues for an application as it is within an area of retained vegetation and land retained for agriculture.

- 9.6 The EA also noted that the drainage strategy recognises the need to not put adjacent areas at risk from flooding and related to this it highlights that the watercourse that runs through the site links to a tributary of the River Ise which flows through Burton Latimer and highlighted that as well as demonstrating there is no increase in flood risk from Kettering Energy Park the scheme should also aim to reduce flood risk. The EA would also like to see a drainage strategy outlining how foul flows (during construction and operation) will be disposed of prior to construction and considers the masterplan should include wording to recognise this. Linked to this, the EA also advised that its preferred option is that the development connects to the existing mains sewerage network and that Anglian Water should be consulted prior to this to gauge if capacity exists to do so and, if not, then any proposed packaging treatment plants would require a permit. The EA also considers the masterplan needs to consider the protocol for when there is a lack of rainwater for hydroponic uses and would like to see the intended plan for this circumstance (including potential need for an abstraction licence). The EA also recommends that the developer has a method statement outlining how pollution will be prevented during construction, including a silt management plan and advises that permits may be required to discharge to surface water. In doing so the EA recommended a number of sources of information for the developers to refer to.
- 9.7 The EA also highlighted that in relation to groundwater a preliminary risk assessment is usually required to assess the potential risks from contamination and that the masterplan should recognise this. In doing so the EA's response provided a recommended approach for the developers to follow.
- 9.8 The Council's Flood and Water team also provided detailed comments on the proposed Drainage Strategy. These included details in relation to a minimum 40% climate change percentage used for design/sizing, maintenance, supporting biodiversity, use of bioretention systems ("rain gardens") and permeable paving. Generally, the scheme was considered to be "great".
- 9.9 Place Services considered that references to "attenuation basins and features" should be expanded to describe how source control (e.g. rainwater harvesting, permeable paving and filter strips) and site control (e.g. bioretention areas, swales and attenuation basins) will be used. Inclusion of a greater variety of imagery was also suggested to demonstrate what can be achieved at all scales.

Q4 - Officer response and recommendations

- 9.10 Section 12 of the masterplan sets out the Drainage Strategy. A Surface Water Drainage Note was prepared to support the preparation of the masterplan which sought to identify sustainable drainage constraints and opportunities on the site and to assess the suitability of proposals from a sustainable drainage perspective. A Flood Risk Scoping Study has also been undertaken.

- 9.11 At this stage the masterplan provides a framework for developing more detailed proposals. Further assessment work will be required to support detailed proposals.
- 9.12 It is recommended that discussions take place with the site promoters to discuss incorporating the following changes:
- Inclusion of reference to the location of the area of the site which extends to Flood Zone 3 and inclusion of the approach to foul flows within the drainage strategy, as requested by the EA.
 - Inclusion of additional text on source control and site control plus associated imagery as suggested by Place Services (and the NNC Flood and Water Team).
- 9.13 It is also recommended that the detailed information provided by the Environment Agency and Council's Flood and Water team should be considered by the site promoter and should inform proposals as they develop.

General comments within the Environment and Biodiversity Section questions

- 10.1 There were a number of general comments made within the environment and biodiversity set of questions but which do not relate to these. For completeness, these are summarised below.
- 10.2 One respondent considered solar panels and windmills are ok but warehouses are not. Others considered there were too many warehouses, that large buildings would have a significant impact on the environment, jobs would be poor quality, the development was not wanted, farmland used to grow food should not be lost and the increased traffic would cause pollution.
- 10.3 Respondents commented that it is only an Energy Park in name, there is not enough information about environmental impacts to reach informed decisions, the proposal is environmentally unsound and leaving the countryside alone is the best thing to do. One respondent considered some aspects, e.g., solar farm and hydroponics area, could be implemented with limited impact on the environment. It was highlighted that it is crucial to protect the environment for future generations and people choose to live in the countryside not for it to be concreted over.
- 10.4 The North Northants Green Party responded that it was encouraging to see the inclusion of active travel routes and welcomed the active travel links to Burton Latimer but considered active travel links should also be provided to Hanwood Park and the Kettering side of the A14. Another respondent commented that there are no buses so locals would have to use cars.
- 10.5 One respondent considered Hydroponics would be of great interest to food producers whereas another queried whether land would remain productive after development.
- 10.6 It was also queried why there are two boundaries - masterplan and development - and whether this was a backdoor way of extending the

Masterplan boundary (this issue is addressed within at Q14 - Do you have comments on the proposed Development Boundaries? (Section 14)).

Jobs and Economy

Q5. Do you have comments on the proposed mix of uses? (Sections 15 & 16)

Warehousing Proportions and Need

- 11.1 There were relatively limited direct responses to Question 5 in respect of the mix of uses proposed within the Masterplan, although this was augmented by feedback received on this topic within email. Notwithstanding this, however, of relevance to this Question, and adding to the earlier context provided at paragraph 6.15, is that in terms of general consultation feedback to the proposals within the Masterplan, the most substantive area of comment relates to the B8 (Storage and Distribution) element of the proposals, with the need for more of this in North Northamptonshire in particular questioned. This theme is highlighted here as it is considered to set an overarching context for the following review of comments received to Q5.
- 11.2 Further to the above, responses to Q5 contained a varied range of feedback. One respondent considered that “the proposed mix of uses sounds sensible” but “the danger in Northamptonshire is that it will always be heavily weighted towards warehousing which only provides low skilled/low waged jobs” and sought a guarantee “that this won’t be the case, and that more skilled employment will equal or outweigh warehouse opportunities.” On this theme, Kettering Town Council advised “the mix of uses should be as wide as possible”, the “masterplan needs to avoid giving the impression that this could turn into a logistics hub” and considered “a defined mix of employment types and uses needs setting out so as to make it hard to revert to a small number of big sheds over time.” Other feedback received was that “Employment Zone North and South are just going to be more vast, imposing swaths of B2 & B8 warehouses. There are no mixed uses there, just lots and lots of massive warehouses. All of the other proposed uses are dwarfed by these warehouses.” Another respondent echoed these concerns, stating as warehousing “is included in both the North and South we could just end up with another warehouse complex”. Other feedback raised concerns that “the mix of uses will be fundamentally incompatible” and sought functioning examples.
- 11.3 A more substantive response to this question considered “that the c.70% split weighs too much in favour of B8 occupiers and thereby goes against the objective of Policy 26 of the adopted local plan which seeks to provide a mix of complimentary employment uses to facilitate development of local knowledge, expertise and research and development” and that this also goes “against the masterplans objective in terms of creating an environment and facilities designed to attract investors and pioneers in the green economy, and also provide capacity to accommodate businesses struggling to find spaces in areas of high demand such as Cambridge.” This same response outlines that

JCS Policy 26 does not make reference to logistics development at the Burton Wold site²⁷ and therefore B8 floorspace should not be proposed as doing so would prejudice delivery of the Energy Park for its intended purpose for renewable and low carbon energy generation (thereby conflicting with JCS Policy 26), whilst also undermining the delivery of sites allocated for B8 floorspace in the Local Plan. On this point, feedback was received from another respondent who advised the site is not allocated in the JCS for strategic B8 (and B2) development²⁸ and also flags that in the Pre-Submission Stage Background Paper on Strategic Housing and Employment Sites January 2015, “the Burton Wold site was dismissed at that stage on the basis that it was a site in open countryside and not within or adjacent to a Growth Town or Market Town²⁹”.

- 11.4 Finally, on the theme of warehousing within the proposals, the North Northants Green Party stated the 70% figure as “hugely disappointing as we would not expect these jobs to be of the quality that local people need and indeed with more automation in the warehousing industry those jobs are not likely to be sustainable in the long term”. Furthermore, the CPRE (and others) considered that the proposals are effectively warehouse development by another name.

Policy 26: Make provision for a mix of complimentary employment uses to facilitate development of local knowledge, expertise and research and development.

- 11.5 Within Policy 26, in respect of Kettering Energy Park, it is made clear that any future masterplan is to “Make provision for a mix of complimentary employment uses to facilitate development of local knowledge, expertise and research and development” as per criterion (b). As a linked area to Q5, in addition to the preceding feedback, comment was received that the Masterplan proposes employment uses to meet general needs with no relationship to the green technologies sector and instead it seeks to create a large employment/logistics park in an unsuitable location, detached from the Growth and Market Towns as defined by the JCS. Linked to feedback on the

²⁷ The same point was also made by a number of other respondents to this Question.

²⁸ These points link to paragraphs 5.21 and 5.26 of the report taken to EAP on March 27th.

²⁹ Burton Wold Wind Farm” (Map ref 3) was considered in the NNJPU’s “Draft Background Paper on Strategic Housing and Employment Sites” (August 2012) for “Employment” (warehousing) and a “Strategic Energy Park”. This was discounted at the first stage sieve of site assessment as the site was identified as located “in open countryside and not within or adjacent to a Growth Town or Market Town” and because “insufficient information received to assess energy park at present.” An “Updated Draft Background Paper on Strategic Housing and Employment Sites (August 2013) was subsequently produced and again “Burton Wold Wind Farm” (Map ref 3) was discounted at the first stage sieve of site assessment for the reasons outlined above. On this basis the site was not included within the NNJPU’s “Consultation on Strategic Housing and Employment Sites” (August 2013) which outlined those “preferred (strategic) sites” for inclusion within the JCS. A final “Background Paper on Strategic Housing and Employment Sites” was published in January 2015 outlining the methodology used to identify and assess sites for possible inclusion in the Plan and the evidence and justification for the allocation or non-inclusion of sites. Again, it was clarified that “Burton Wold Wind Farm” (Map ref 3) was discounted as the site recorded as “in open countryside and not within or adjacent to a Growth Town or Market Town” on account of insufficient information being available at the time.
<http://www.nnjpu.org.uk/docs/Final%20updated%20Background%20Paper%20Jan%202015.pdf>

employment uses criteria, the same respondent considered that, as drafted, there is concern that the unrestricted nature of the uses within, and the fact that the restrictions do not ensure that employment uses will facilitate local knowledge, expertise and research and development in renewable energy technologies, the criteria, as drafted, will deliver a large employment/logistics park at this location. On this theme another respondent suggested that reference to “logistics and distribution operations” should be removed from the criteria. Feedback was also received that the Vision should be updated to include reference to “local knowledge, expertise and research and development” as well as the 11 principles which underpin the Vision in order to ensure the site does not become an alternative location for employment development outside targeted users.

Links to renewable energy

- 11.6 Another representation considered that “the proposed uses identified in the Masterplan largely fall within (use) Classes E, B2 and B8, with associated facilities and infrastructure”, recognising that “whilst these uses largely fall under the overarching category of employment, the Masterplan does not specify how they would be related to renewable energy” as “Policy 26 specifically details that land uses should be for renewable and low carbon technologies and therefore the Masterplan and any future planning applications should be in accordance with the JCS and ensure that all proposals for employment uses should be directly related to renewable and low carbon energy.”

Future Technology Centre

- 11.7 Linked to the above, in terms of the Future Technology Centre, feedback was received querying the need for this as it was considered the site denotes a proposed industrial site and not a place of education and universities and that colleges exist for the purpose of learning new technologies (its inclusion was suggested to represent “a tick in the proverbial box”). In contrast, other feedback was received which considered that the Future Technology Centre was the only feature proposed in the Masterplan which gets close to the Policy 26 requirement to “facilitate development of local knowledge, expertise and research and development”, albeit this was recognised as only forming a tiny part of the overall proposals. Nevertheless, NCC’s Economic Development team considered the Future Technology Centre to provide the opportunity to make links to local universities at Northampton and Cranfield, with early delivery of this considered key to helping market the site for research and development purposes.

Hydroponics

- 11.8 Only one representation was directly received to Q5 on the proposed inclusion of Hydroponics within the Masterplan. This was received via NCC’s Economic Development team who sought further details on this element of the proposals as the area identified for this use (100 acres) was considered “a

significant amount of the total employment site overall”, with the suggestion made that there may be potential for “other uses for ‘more industrial-looking units with less glazing’ be considered and built but with a more multipurpose use class in mind that might not be in this sector (i.e. units would be more appropriate for smaller SME’s to grow and become part of the local supply chain)”. A linked (general) comment to the Jobs and Economy section considered the idea of hydroponic agriculture as “acceptable and laudable” but did not support the use of polytunnels as “not a pretty sight”. Other comments on the hydroponics element of the proposals received elsewhere stated that this is “an exciting futuristic concept which would be of great interest to food producers in the UK” albeit another representation considered that these would offer limited job opportunities.

Q5 - Officer response and recommendations

- 11.9 The JCS recognises the importance of warehousing and distribution (B8) to the local economy, with Logistics outlined as a priority sector. Indeed paragraph 8.9 of the JCS recognises this as a particular strength and opportunity, particularly in respect of national and regional distribution centres for ‘blue chip’ companies and the potential for provision of “a significant amount of office floorspace” and “higher value employment through higher paid jobs such as managerial positions”³⁰.
- 11.10 To facilitate the continued growth of this sector the JCS also includes Policy 24 (Logistics) and identifies strategic allocations within Section C (Development Principles for Strategic Sites), including for strategic B8 development (among other uses), with these sites clearly identified within the Key Diagram.
- 11.11 The JCS also identifies “Renewable and low carbon energy and green technologies” as another priority sector and includes “wind, solar, biomass and other technologies, and associated research and development, food production and food production benefits” as part of this (paragraph 8.9). To aid development in this sector it includes Policy 26 (Renewable and Low Carbon Energy) and makes provision for development to come forward at “Land at Burton Wold” within. However, unlike the strategic allocations referenced above, “Land at Burton Wold” is not specifically allocated for strategic scale development within the JCS, it is identified for an Energy Park. Of course, Policy 26 specifies that proposals for the site are to “make provision for a mix of complimentary employment uses” albeit the Policy (or indeed the wider JCS) does not specifically allocate “Land at Burton Wold” as a site for strategic scale development. Indeed, as outlined in the EAP report of 27th March 2023 (paragraph 5.26), this site was not subject to prior site assessment on the same basis as all other sites considered (and subsequently allocated) for strategic development in the JCS, further

³⁰ At paragraph 8.20 the JCS also defines “strategic distribution” as serving the national warehouse and distribution market and considers these to be sites with individual units of over 100,000 square feet (or 9,300 square metres).

confirming the rationale for not considering the site a strategic allocation (or location for a strategic scale of development). Notwithstanding this, however, the importance of the low carbon sector is emphasised through the HENA, within which this is described as “thriving” in North Northamptonshire (paragraph 11.118), with it set out that “further research may be warranted in the form of a sector study that considers specific market trends and opportunities in the medium term (i.e., retrofit in construction, renewable energy, supply chain opportunities etc)”.

- 11.12 The previous report to EAP raised issue at the scale of strategic B8 (Storage and Distribution) being proposed at a site not specifically allocated for these uses and this issue has similarly been identified as a concern through responses to Q5 (and wider consultation feedback received). North Northamptonshire is located close to the logistics ‘golden triangle’ and consequently there is significant pressure from the logistics industry to bring forward sites, particularly in proximity to trunk roads (including the A14). In light of this, and as part of developing the North Northamptonshire Local Plan, NNC has commissioned IcenI to consider how the need for logistics floorspace identified across the area to 2041³¹ could be apportioned in light of considerations including junction capacity (including A14 J3-13 and other key corridors), labour force, environmental constraints and policy issues. Obviously, this work is of relevance to the current proposals given this site was not formerly assessed through the Joint Core Strategy evidence base for the (strategic scale) uses proposed in the Masterplan and it may be of help in addressing this issue in part (alongside the other evidence base work undertaken to inform development of the Masterplan). Furthermore, as discussed at paragraph 5.26 of the EAP report of 27th March 2023, it will be important to consider the relationship with the NN Local Plan as the current proposals would take up a significant amount of North Northamptonshire’s future logistics requirements and reduce the need for additional sites across the area.
- 11.13 However, given the strategic scale of what has been proposed through the Masterplan, should the promoters not be amenable to reconsidering the mix and scale of uses on the site, the intention is that the site will be subject to assessment on the same basis as other sites put forward for potential allocation in the North Northamptonshire Local Plan, given this has not occurred previously.³²
- 11.14 In response to the feedback querying the need for more warehousing in North Northamptonshire, through the Council’s ongoing commission with IcenI (referenced above), it has been possible to secure data on the vacancy of strategic B8 units (100,000+ sqft) at a 2023 date. This data outlines that there

³¹ The current supply (commitments) for this is estimated at around 277ha. Therefore, a further 140ha (480,000 sqm) will be required to 2041 without prejudice to further decisions or processes on the distribution of need.

³² The site was submitted in response to the “Call for Sites” relating to the North Northamptonshire Housing and Economic Land Availability Assessment (HELAA) and will be assessed via this process.

are 13 available warehouses across the area, 4 of which are under construction or renovation. Of the remaining 9 warehouses, three were built in the last year and yet to let and one is over 35 years old (see Appendix C for details). It is therefore true, as outlined through consultation feedback, that there are warehouse units currently sitting empty within North Northamptonshire. The advice is that this is in part due to more (warehouse) stock coming onto the market following the strong market forces seen during the covid pandemic and that these trends are similarly recorded across the East Midlands and UK. Notwithstanding this, however, recent research by Icenl on behalf of the South East Midlands Local Enterprise Partnership (SEMLEP)³³ finds there could be a need for up to double the existing warehousing space over the next 20 years, even after taking into account the recycling of some existing stock, and those areas that host major routes are likely to see ongoing significant demand for spaces. Taken together with the outputs of the (2023) North Northamptonshire Housing and Economic Needs Assessment that at least 480,000m² of logistics floorspace is needed across the area to 2041, in addition to existing commitments, it is clear that there is strong demand for strategic warehousing in North Northamptonshire, which is projected to remain over the long term. This will be a key issue for the NN Local Plan to respond to, informed by the evidence base referenced in this report.

11.15 It is recommended that discussions take place with the site promoters to discuss incorporating the following changes:

- Include reference to local knowledge, expertise and research and development the wording of the Vision or the 11 Principles that underpin the Vision as contained in Section 2.
- Review inclusion of “logistics and distribution operations” within the Energy Uses criteria.
- Have further discussions with promoters about the scale and mix of uses at the site.
- Undertaking a sector study that considers specific market trends and opportunities in low carbon sector the medium term as per the outputs of the HENA with a view to informing the approach taken at the site in respect of developing the element of the proposals relating to the Future Energy Centre and on-site technologies.

Q6. Do you have comments on the scale of proposed uses? (Section 15)

12.1 Section 15 does not specifically define “scale” within³⁴ although it does provide detail on both the projected height of proposed buildings on site as well as the extent (floorspace areas) associated with these. On this basis,

³³ Warehousing and Logistics in the South East Midlands (September 2022): https://www.semlep.com/warehousing-and-logistics/?_hsmi=264171048

³⁴ Although Section 19 (Building Design Principles) does provide some context with a sub-section on “Scale Principles” where the emphasis here is on building heights and mass.

responses to Q6 and the issue of development “scale” have broadly been along these themes.

- 12.2 There were limited direct answers to the question via the feedback form. However, of those received, respondents considered this question to cover both building height and extent of the proposals (both of which are covered elsewhere). Most of these raised similar concerns about the dominance of the proposals upon the local area and beyond, with comments including “too big for a rural site”, “will dominate the area”, “the scale of the Energy Park is significant and therefore careful consideration of its visual impact is essential to ensure the impacts on the landscape character are acceptable.”
- 12.3 A query was also raised in relation to proposed building heights at Employment Zone South, where references to units of up to 21m in height were accompanied by alternative anticipated building heights of between 18m and 30m from finished floor level. Feedback received on this basis queried whether a real mix of B2 (General Industrial) and B8 (Storage and Distribution) is intended as if buildings of 30m height are the only viable option it will impact on the local SME ecosystem and opportunities for different supply chains to locate on this site.
- 12.4 Historic England also provided feedback relevant to Q6 regarding the scale of the proposed development and considered that the maximum (building) height of up to 30m has potential for far-reaching impacts and was keen to understand the background evidence informing the Masterplan in this respect. In doing so relevant guidance³⁵ from Historic England was shared to assist the promoter’s in their assessment work.
- 12.5 Feedback to the issue of “scale” was also received via email, albeit in greater numbers. A number of these responses referred to the proposals as “large scale” (or indeed “super scale”) development which was out of “out of scale” for the local area and in this context concerns about the impact both upon the local (neighbouring dwellings and surrounding settlements) and wider area (landscape and visual impacts) was raised. “Dominance” was another term frequently used when considering the scale of the proposals in this respect. As part of this thematic feedback, Woodford Parish Council specifically objected to the scale of the proposals.

Q6 - Officer response and recommendations

- 12.6 As outlined elsewhere, (including feedback at Q5), the quantum of development proposed has been considered in the earlier report taken to EAP on 27th March 2023, with officer concerns both about the fact this site is not explicitly allocated for a strategic scale of development (as the current

³⁵ Specifically, these documents are “The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) - <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/> - and The Historic Environment and Site Allocations in Local Plans (Historic England Advice Note 3) - <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

proposals constitute) and also the impact of these on the development of the North Northamptonshire Local Plan, if they were to proceed. Concerns also remain with regards to the height of buildings proposed at the site (see response to Q15 within).

12.7 With regards to feedback from Historic England, the promoters have prepared an updated Built Heritage Assessment (October 2023). This seeks to respond to points of clarification sought by Historic England with a view to receiving their endorsement that the potential impact of the proposals on designated heritage assets is satisfactory. This work is yet to be endorsed by either Historic England or Place Services, as the Council's advisors on Heritage matters, at the time of writing. On this basis the intention is to provide a verbal update on this matter.

12.8 It is recommended that discussions take place with the site promoters to discuss review of the proposals in respect of the following:

- The extent of buildings in terms of scale (floorspace and height);
- Confirmation from Historic England and Place Services that the evidence base underpinning development of the Masterplan, and inter alia, the Masterplan itself, is technically robust in respect of identification and mitigation of the impacts of the Energy Park proposals upon Heritage assets. This includes confirmation that the guidance documents provided by Historic England at paragraph 12.4 have been used accordingly in doing so.

Q7. Do you have comments on the "Employment Uses Energy Criteria"? (Section 16)

13.1 The employment uses energy criteria set out in the Masterplan was developed in conjunction with the South East Midlands Local Enterprise Partnership (SEMLEP) and the Greater South East Net Zero Hub and seeks to provide a framework for future business occupiers at the site. These set out the intention that new premises built at the site will be for "businesses that have high energy demands or which are associated with the transition to a low carbon economy or society" and contain three criterion, two of which relate to a future occupiers energy demands – specifically Criterion 2 - the ability of future users to access this from onsite renewables (a minimum of 50%) and Criterion 3 - that every unit at the site will have access to a minimum power supply of 1MW per 100,000sq ft/9,290sq m. Criterion 1 specifies which business sectors are considered appropriate in the context of high energy demand users and include (a) energy infrastructure (Solar, sustainably powered CHP, hydrogen, GSHP and battery storage), (b) automated operations (including robotic/automated manufacturing, logistics and distribution using intelligent robotics) and (c) engineering, manufacturing, R&D or other operations linked to low/zero carbon sectors. However, of the 3 criteria outlined, a business wanting to locate at the site would need to meet 2 of these, namely criteria 1 (a, b, c or any combination thereof), 2 or 3.

- 13.2 In respect of this criteria, email feedback was received that as drafted, it was considered criterion 1, is too “open-ended” (or “unrestricted”) and could theoretically mean every business on site could end up being one of the automated operations allowed by criterion 1b and facilitate large scale logistics and manufacturing operations (which were not considered to advance local knowledge as Policy 26 requires). Furthermore, in requiring compliance with one of (the remaining) criterions 2 and 3, the potential was considered to exist for a future occupier to not make use of the minimum 50% energy demand being made available by the on-site renewable infrastructure” (criterion 2), with businesses instead utilising criterium 3 (and access to a minimum power supply based on the ratio of 1MW per 100,000sq ft/9,290 sq m). In doing so, feedback was this scenario could effectively mean businesses would not have to have their energy requirements met by the onsite renewable energy in their operations (and this is considered in direct conflict with the requirements of Policy 26). Other feedback was received that the criteria need ensure that future business occupiers on site are directly linked to the green economy because, as currently drafted, this is considered to propose employment uses which meet general needs and which have no relationship to green technologies.
- 13.3 Building on the above, there were limited direct answers to the question via the feedback form. However, of those received, further clarification was sought on what the definition of a “high energy user” is, with one suggestion that criterion 3 should be mandatory as this provides the basis of a definition.
- 13.4 There was a limited response to criterion 2 via the feedback form (which seeks a minimum of 50% of the energy demand from new operations is provided by on site renewables). Where this was received the feeling was that this figure was too low given on site capacity. This was, however, augmented by email feedback which similarly considered the 50% figure too low and also in conflict with statements elsewhere in the document which flags potential for this to be 100% (i.e., the Foreword, and Section 23 – Response to Policy 26).

Q7 - Officer response and recommendations

- 13.5 On review, the concerns relating to the Employment Uses Energy Criteria, as drafted, specifically that they could lead to potentially all businesses on site being large scale logistics or manufacturing units which could bypass use of onsite renewables in any new employment units (calling into question the Energy Park concept) is not a scenario sought by the Council. It is therefore proposed that the criteria are reviewed as part of the Promoter’s response to the consultation.
- 13.6 In response to queries on the definition of what is considered a “high energy user”, it is considered that this is covered at criterions 2 and 3 of the Employment Uses Energy Criteria and at other points within the masterplan where it is outlined that the proposals seek to cater for businesses with a high energy demand to adapt to a low/zero carbon economy and reduce their carbon footprint. The masterplan defines these businesses as cold stores,

data centres, operations that use robotic retrieval systems (page 9), engineering, manufacturing, research and development, other operations linked to low/zero carbon sectors or the transition away from fossil fuel dependency plus storage and distribution (page 27). On this basis, it is considered the masterplan does provide guidance on the definition of a “high energy user” in the context of a high-level document albeit further to feedback received this could maybe be consolidated within Section 16 through the addition of the various definitions outlined.

- 13.7 In response to the 50% on site energy demand being met by on site renewables, the promoters flag the intermittent nature of renewable energy – specifically that generation is linked to factors including climatic conditions (including seasonal conditions) and daylight hours. This means it is not possible to secure renewable energy generation 100% of the time. To counter this battery storage is proposed on site to help store excess (renewably generated) energy for later use (contributing towards attainment of the 50% on site energy demand set in the criteria). Additionally, it is understood that the on-site Grid connection is proposed to provide a backup supply of energy and provide the security of supply which future users/ businesses on site will require³⁶. Indeed, the promoters consider this security of supply as essential if future occupiers are to consider basing themselves at the site. This connection will also enable any excess energy generated at the site to be exported back to the grid (with the proposed substation needed to enable this). Notwithstanding this, however, the advice is that the scale of the solar proposed at the site (both ground and roof mounted) will generate enough energy to meet the needs of future occupiers. Furthermore, the promoters consider it is possible that the 50% threshold set in the criteria could be exceeded (as outlined within the masterplan).
- 13.8 As part of the consultation process the Council has engaged with National Grid to gather their feedback on the viability of the Energy Park proposals from a grid and technical perspective. In response, National Grid advised they have no concerns with the proposals having been in discussions with the promoters for some time³⁷. Furthermore, in relation to the proposal that future occupiers secure a minimum of 50% of their energy demand through the on-site renewable infrastructure, National Grid recognise the intermittent nature of renewable energy and outline that it will be necessary for future operations at the site to draw down energy from the Grid. Specifically, it was advised that, on the basis of the quoted limits of renewables-derived energy being generated at the site, this could provide enough power for the scale of operations proposed during daylight hours albeit this would not be achieved during the evenings or winter. On this basis National Grid considers that the minimum 50% energy demand from on-site renewables is reasonable.

³⁶ The intention is that demand for energy will also be reduced through the provision of highly energy efficient new buildings on site.

³⁷ Given that an agreed connection to its overhead 132kV power lines exists alongside a contract which is in place to import 40MW and export up to 65MW of energy to/from these.

Additionally, National Grid advised that the site needs 'high energy' users in order to maximise the use of energy created by the on-site renewables. This is because the Grid is initially unable to accept the maximum theoretical supply the site can create due to constraints on the local network which means that it cannot accept new export connections until 2031.

13.9 Notwithstanding this, however, on the basis of the above, it is recommended that discussions take place with the site promoters to discuss incorporating the following changes in respect of the Employment Uses Energy Criteria:

- Amendment of the Energy Uses Energy criteria to address the potential implications which exist through the current draft version;
- Greater clarity on what constitutes a high energy user (both at Section 16 and elsewhere in the Masterplan);
- Firming up on the 50% energy demand requirement relating to business use of on-site renewables (with a view to increasing this %).

Q8. Do you have comments on helping address skill shortages and promote better training opportunities locally? (Section 21)

14.1 As covered elsewhere, there was much consultation feedback received on the number of warehouses already built in the local area with the general perception that there is an abundance of these already. In this context, email feedback was received that adding additional Storage and Distribution (B8) uses to this mix at Kettering Energy Park would be creating low skill, low/minimum wage employment opportunities (as is the perception of the local offer based on a number of responses received). On this basis, where feedback was received, there was scepticism additional Storage and Distribution (B8) would help address skill shortages and promote better training opportunities given the perception the local area has enough entry level employment. Furthermore, feedback was received citing issues that existing local warehouses have attracting and/or retaining staff, with DIRFT named as an example where staff are being bussed in to work due to a lack of employees locally. In contrast, feedback from the Council's Economic Development team was more positive in this respect, noting that whilst Logistics and B8 storage could potentially have less employment density versus other manufacturing opportunities, equally B8 can be highly automated, bringing skilled jobs to the local area. Furthermore, in conjunction with the reference to the community benefits outlined in Section 22 (Proposal Benefits), the Economic Development team was supportive of the proposals to encourage businesses locating to the site to offer skills and training opportunities to employees. In contrast, the North Northants Green Party raised concerns that warehousing is moving towards automated systems which could limit the number of jobs being created and wondered how the 5,500-job creation figure outlined in the Masterplan could be guaranteed in this respect.

14.2 Conversely, email feedback raised concerns at a lack of detail/evidence justifying the 5,500 jobs figure quoted in the Masterplan, with this considered

to make it difficult to discern if these are well paid, highly skilled job opportunities or low paid, low skilled work, and, furthermore, how this employment demand fits with current or future local employment market availability. Linked to this, other respondents raised concerns about jobs being low paid, zero hour or for drivers who do not live in the area. The struggles that existing warehouses have in recruiting and retaining workforces were also flagged in the context of skill shortages as well as queries received on who will fill the jobs. Concern was also raised at the lack of supportive evidence justifying the need for the number of jobs proposed. In contrast, Kettering Town Council were supportive of new jobs in the area, particularly if these were “green collar” jobs.

- 14.3 With regards to the hydroponics element of the proposals, only one comment was received but this was sceptical about the number of skilled job opportunities associated with this use.
- 14.4 Notwithstanding the above, however, feedback from the Council’s Economic Development team was more positive. Specifically, (alike other representors), there was recognition that B8 uses could have less employment density versus other manufacturing opportunities, although it was outlined that B8 uses can be highly automated and with this higher skilled jobs can be brought to the local area. Building on this, it was flagged the area is well placed to enable the upskilling of existing residents and new jobseekers coming to the area due to the proximity of the University of Northampton, Tresham, Moulton and Northampton Colleges and the Department for Work and Pensions (including use of apprenticeships during the construction stage).

Q8 - Officer response and recommendations

- 14.5 At present, NNC does not have the detail as to proposed occupiers on site and the type of employment which could be provided although it is clear that through the current proposals many of the new roles will be associated with B8 - Storage and Distribution (given the potential prevalence of this use within the proposals). Notwithstanding this, however, alongside representatives from the Council’s Economic Development and Climate Change teams, the promoters met with Cranfield University in early October to make linkages between them and leaders in the field of science and energy with a view to gauging what it possible at Kettering Energy Park and also whether opportunities may exist for the University to have a presence at the site in some form. This denotes a connection which has been made relatively recently so the inference is that this element of the proposals needs further thought and discussion between parties with a view to demonstrating compliance with local planning policy.
- 14.6 On the basis of the above, it is recommended that discussions take place with the site promoters to discuss incorporating the following changes:
- Further clarity on what the Future Technology Centre may entail following discussions with Cranfield University

- Further clarity on projected job numbers on a use class/sectoral basis given “automation” is identified within the “Energy Uses Criteria” (and elsewhere) within the Masterplan as a potential operation at the site.

General comments within the Jobs and Economy Section questions

14.7 Feedback was received that the 5,500 jobs figure was too high for one site/location and that this would create an imbalance of uses and require workers to travel from further afield as this number of jobs could not be filled in the immediate vicinity. Suggestion was also received that these jobs should be more evenly distributed across the whole area.

Renewable and Low Carbon Energy

Q9. Do you have comments on the proposal's response to the climate and environment emergency?

- 15.1 In a trend as outlined earlier, respondents using the feedback form appear to have used this question as either a placeholder to provide (a) a response to the Renewable and Low Carbon section of the proposals, (b) a response to other questions in the section, or (c) general comments on the section (and not specifically answering the question as set). In some cases, this has caused subsequent difficulties in extracting feedback which meaningfully answers the question. The following feedback is therefore provided in this context.
- 15.2 Further to the above, feedback was raised querying how warehouse development, and the trips associated with this from both an operational and staff perspective, represents a response to the climate and environment emergency. This relates principally to the increased levels of vehicle movements that development at this location will bring and the pollution/emissions associated with increased HGV prevalence and car use at a location where development does not currently exist. In this respect, feedback was also received that transport is the largest source of emissions both locally and nationally and that warehousing of the scale proposed is not considered an appropriate response to the climate and environment emergency on this basis.
- 15.3 Aside from the potential transport impacts associated with the proposals, feedback was also received on other areas considered to link to the climate and environment emergency. Specifically, the loss of arable, greenfield, land was cited as a concern in a large number of representations, both from the perspective of impact on food security and local biodiversity, with the North Northants Green Party stating ‘loss of existing farmland should be avoided given concerns over world food supply’ and “while this may not be premium farmland it does provide a viable source of food production” (the retention of the land for productive arable farming was a point others similarly made). Furthermore, the potential removal of hedgerows was a particular concern in respect of habitat loss (and also from the perspective of a loss of a carbon

store). Indeed, the loss of greenfield to concrete was not considered “a response to the climate crisis”.

- 15.4 In response to Q9, the Environment Agency (EA) flagged the provisions of the NPPF (para. 153) which advises that plans should take a proactive approach to mitigating and adapting to climate change and in this respect, considers that the Masterplan should set out how development will be planned over the long term (at least 100 years) to adapt to climate impacts.
- 15.5 The EA also advised that it considered the development should consider inclusion of another of the Oxford Cambridge ‘Arc Environment Principles’ of working towards a target of net zero carbon by 2040.
- 15.6 Additionally, references to Combined Heat and Power (CHP) were raised as a concern in respect of local air pollution resulting from combustion processes as well as the potential for CHP fuel sources to contribute to carbon dioxide emissions, with further detail sought to ensure this will not have a detrimental impact on local air quality or the principles of low carbon energy for the site (Kettering Town Council, North Northants Green Party).
- 15.7 Notwithstanding the above feedback, however, in general terms, respondents supported the provision of additional solar on site, recognising the need to move towards renewable and low carbon forms of energy generation.

Q9 - Officer response and recommendations

- 15.8 As outlined above, Transport is the largest source of emissions both at the national and local level. It is therefore critical that emissions from this source are reduced in an expedient manner if wider net zero requirements are to be attained to reduce the worse effects of climate change. Presently, the Government target is that new, non-zero emission HGV’s weighing 26 tonnes and under shall be phased out by 2035³⁸, with a wider requirement for all new HGVs sold in the UK to be zero emission by 2040³⁹. Notwithstanding these lead-in times, it is clear that local authorities, through their decision-making and planning powers, need to be taking strategic decisions over how their respective areas are to address the need to “support the transition to a low carbon future in a changing climate”, “help shape places in ways that contribute to radical reductions in greenhouse gas emissions” and “support renewable and low carbon energy and infrastructure” (NPPF para. 152)⁴⁰. On the basis of the current proposals, it is clear that public feedback raises concerns that the introduction of a development, which has a particular

³⁸ The Government pushed back its commitment to end the sale of new petrol and diesel cars from 2030 to 2035 (PM Speech on Net Zero – September 20th 2023):

<https://www.gov.uk/government/speeches/pm-speech-on-net-zero-20-september-2023>

³⁹ <https://www.gov.uk/government/news/uk-confirms-pledge-for-zero-emission-hgvs-by-2040-and-unveils-new-chargepoint-design>

⁴⁰ In December 2020 the UK committed to securing a 68% reduction in economy-wide greenhouse gas emissions by 2030 (compared to 1990 levels) through its Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) in line with Article 4 of the Paris Agreement.

emphasis on strategic warehousing and storage, constitutes an inappropriate response to the climate and environment emergency in the context of the additional emissions development at this location would create, both from movements associated with operations on site and staff travel to work.

- 15.9 Furthermore, as raised in responses to the consultation, the proposals, as drafted, would constitute a loss of productive agricultural land. Using the Agricultural Land Classification⁴¹, the site is classified as Grade 3 (good to moderate agricultural land). At page 42 of the Masterplan it is outlined that the majority of the site is considered to be classified as Grade 3b⁴² “which is not considered to be the best and most versatile (land) for agricultural production” (albeit the site is currently in active agricultural use).
- 15.10 To counter the loss of agricultural land, as outlined in the report to EAP on 27th March 2023, a 47-hectare Hydroponics (advanced agriculture) area is proposed at the site comprising specialist glasshouses (powered by the onsite renewables) which provide a controlled growing environment which enables an extension of growing seasons, less reliance on imports, more efficient use of water and greater crop yields. Furthermore, the proximity of businesses which generate excess heat is identified as key (such as manufacturing or cold storage uses). On this basis, it appears that the hydroponics element of the proposals may not be able to proceed unless linked features, such as manufacturing or cold storage, were not to concurrently come forward given the reliance on their waste heat (and as CHP appears to be effectively discounted as a use for powering any on-site hydroponics at Section 15 (page 25) of the Masterplan). What is clear, given it is not yet known who the future site occupiers are, the “Employment Uses Criteria” as discussed elsewhere in this report, have a key role to ensure future businesses/uses at the site can deliver the waste heat necessary to facilitate the provision of Hydroponics on site, otherwise the viability of this element of the proposals may be called into question.
- 15.11 In response to the issue of the loss of agricultural land, the Council asked the promoters to provide a land use budget which details the changes at the site as a result of the development proposals. Inclusive of these, the (blue line) Masterplan boundary is determined as comprising 45.5% retained farmland (with an additional 0.4% attributed to Farm Buildings). Additionally, 9.0% of this area is assigned for Hydroponic Use. Together this equates to 54.9% of the site being in use for agricultural purposes. Furthermore, when these elements are considered in relation to the (red line) Development boundary, the proportion of the site dedicated to these increases (with the exception of retained farmland which is not proposed within this location).

⁴¹ Magic Map (Defra) - <https://magic.defra.gov.uk/magicmap.aspx>

⁴² Moderate quality agricultural land - <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land#alc>

15.12 It is recommended that discussions take place with the site promoters to discuss incorporating the following changes:

- Clarity on the projected emissions associated with vehicle movements linked to the site.
- Clarity on the ALU classification of the site.
- Revision of the “Employment Uses Energy Criteria” to help facilitate delivery of hydroponics on site.
- Clarity on the status of the CHP element of proposals (this may be linked to the low carbon sector study proposed at paragraph 11.15).
- Provision of evidence that the proposals are mindful of the need to set out how development will be planned over the long term (at least 100 years) to adapt to climate impacts (in line with EA feedback).

Q10. Do you have comments on the assessment of appropriate Energy Infrastructure? (Section 16)

16.1 Section 16 (Proposed Uses) defines appropriate energy infrastructure as including infrastructure to form a point of connection to the National Grid through overhead power lines, battery storage, additional ground mounted Solar PV and Ground Source Heat. It also flags the potential for hydrogen-based infrastructure and sustainably powered Combined Heat and Power (CHP) at the site. This section also outlines the energy infrastructure not considered suitable for the site and lists these as biomass, anaerobic digestion and additional wind turbines.

16.2 In general terms, where referenced, there was support for additional renewable forms of energy generation at the site (for example, ground mounted solar PV). However, this was generally less pronounced when considered in relation to the employment-generating proposals contained in the Masterplan, with the need for this questioned altogether (as a number of representations consider it is unnecessary for development on site to make use of the renewable energy being produced).

Wind

16.3 Feedback was received on the lifespan of the existing wind turbines at the site with it flagged that a number of the original installations are nearing the end of their lifespan, and the implications on the energy park proposals in respect of future businesses at the site being able to utilise renewable energy as intended. Linked to this, feedback also flagged that the existing turbines have been sold to third parties and that this may cause an issue in delivering the objectives of the Draft Masterplan (and indeed local planning policy) if not under the control of either the landowner or promoter.

Grid Connection and High Energy Use

16.4 The most comments received in respect of Q10 relate to the proposed point of connection to the National Grid, with a number of these framed in the context of the proposed Employment Uses Energy Criteria which states “a *minimum*

of 50% of the energy demand from operations within the new units is provided by the on-site renewable infrastructure". Although the potential for 100% of business energy needs being met by on-site renewables have limited references elsewhere in the Masterplan, a number of respondents considered that on the whole, the proposed National Grid connection was received negatively. That is, a number of respondents considered this 50% value too low and at this level would be placing more demand on the National Grid (in having to make up the 50% shortfall) whilst concurrently removing capacity available for businesses and housing across the local area. As an alternative, a number of respondents suggested that the commitment should be 100%. This includes the North Northants Green Party who advised the development should ensure there is 100% operational energy use for the site from the on-site renewable sources with any excess balance being exported to the grid).

- 16.5 Additional feedback on this area considered that in needing to import energy from the National Grid the existing, and proposed, renewables on site are insufficient for the scale of development being proposed. Furthermore, it was considered that the idea of a renewable energy park needing to import energy is contradictory and that the proposals seek to introduce an energy demand where there was none previously and consider that the concept of "high-energy demand businesses" has been included within the Masterplan due to the site being now unable to link to existing and planned developments⁴³ (with this meaning a demand for the energy needs to be created to use the power associated with the site). Finally, a number of respondents flagged that the National Grid has a connections backlog exists which would hamper the ability of the proposed energy infrastructure to connect for the foreseeable future.

Combined Heat and Power (CHP)

- 16.6 There was limited feedback in respect of the potential for CHP on site. Where this was received, there was the strong opinion that CHP is not renewable energy. Furthermore, issues of odour and air pollution were raised due to the combustion processes associated with this technology and clarity was sought on potential fuel sources given the potential for these to contribute to carbon dioxide emissions (Kettering Town Council, North Northants Green Party). Indeed, the North Northants Green Party consider the mention of CHP in the Masterplan "a major issue" with incineration for energy production not supported as "burning materials is not renewable energy and should be removed".

Battery Storage

- 16.7 There was slightly more feedback received in respect of proposals for battery storage on site. Generally, all responses were positive to this as part of maximising power generation and balancing demand against generation.

⁴³ East Kettering SUE and strategic development at J10 of the A14 are examples cited in JCS Policy 26

Linked to this, one respondent suggested that a battery storage array would be required by National Grid to ensure load balancing and prevent surges in energy production. Other feedback was received (via email) that given the amount of time the existing turbines are stationary, battery storage must be a high priority in order to maximise power generation.

Ground Source Heat Pumps (GSHP) and Hydrogen

- 16.8 No comments were provided with regards to the potential for GSHP on site and only one comment was received in respect of Hydrogen. This came via the North Northants Green Party who considered that further information on this element of the proposals should be provided to clarify how the hydrogen would be used and how water for electrolysis (to separate hydrogen from this) would be obtained.

Solar

- 16.9 Feedback was also received querying whether the solar element of the proposals will be delivered. Specifically, it was raised that the site already benefitted for a number of solar farm permissions albeit none are constructed yet. Notwithstanding this, however, there was broad support for more renewable energy on site, as outlined elsewhere.

Q10 - Officer response and recommendations

- 16.10 It is considered that, in relation to proposals for new development at Kettering Energy Park, JCS Policy 26 seeks additional, co-located, renewable generation infrastructure on site and the provision of additional/new/expanded renewable/low carbon technologies is the starting point from which associated employment land uses are to be developed.
- 16.11 In respect of Turbine ownership, this is not a point Officers were previously aware of, but it has since been confirmed by the promoter's planning consultant that these are owned by third parties. In response to this feedback, the promotion team has advised that they will update the Masterplan document to reflect this fact and provide detail as to how this aligns with the proposals. Additionally, the issue of the age of the wind turbines has also been raised with the promotion team who have advised of approvals from the former Kettering Borough Council to extend the operational period of consented wind farms from 25 to 35 years (KET/2020/0393). Notwithstanding this, however, the question of how third-party ownership impacts on the current proposals is considered to remain valid.
- 16.12 In respect of battery storage although this technology does not constitute a renewable/low carbon technology from a generating perspective, it is considered to play a key role in supporting the deployment and use of these technologies through the capture and subsequent deployment of green energy, matching supply with demand as required to reducing pressure on the electricity network. Potential also exists for stored energy to be used by the National Grid to manage peaks in demand. On this basis, the proposed

provision of battery storage is considered important to help maximise renewable energy output and use and help reduce emissions concurrently.

- 16.13 In respect of CHP, the fuel type used is key to whether it is considered renewable technology or not. CHP's often use natural gas in this respect, but this does not constitute a renewable fuel source. However, renewable fuel sources are available, such as biomass or biogas, which when used in such instances makes CHP a renewable energy technology. In doing so CHP is recognised as an efficient and cost-effective way to generate electricity and heat (as it produces fewer greenhouse gas emissions per unit of energy generated) and this in turn increases energy security as by generating electricity and heat on site, businesses can reduce their reliance on the grid. However, as linked to comments at paragraphs 15.10 and 15.12 above, further clarity is sought on the commitment to delivery of CHP on site and its intended use (albeit this can be explored through any subsequent planning application).
- 16.14 In respect of the existing solar consents, the advice from the promotion team is that although these are not currently built and operational, the planning permissions relating to these has been implemented via previous works on site undertaken. It is the Council's understanding that further to discussions with National Grid, grid export constraints are the key reason why these are yet to be constructed.

Energy Use

- 16.15 In response to comments regarding "Grid Connection and High Energy Use", as outlined at Section 4 of the Masterplan (Strategic Overview & Need), the intention to match energy production with consumption is outlined through supply of renewable resources for energy intensive businesses, and also that an agreement exists with the network operator to import 40MW and export up to 65MW of electricity to provide a robust energy supply to businesses and also to provide flexibility for the National Grid, making best use of the energy generated at the site. Furthermore, as outlined at paragraph 13.8 within, the National Grid has not advised of any issue with the proposals, given the long-term discussions with the promoters, other than acknowledging high energy users for the site are necessary to overcome issues of grid connection constraints which exist over the short to medium term.
- 16.16 Within the Masterplan it is made clear that any CHP proposal on site would be sustainably powered (which, as outlined above, would make this a renewable resource). However, at Section 15, the Masterplan, also makes clear that the intention is to use on-site renewables in combination with a business that generates excess heat to power any hydroponic system, so at present the inclusion of CHP as a potential on site technology appears a moot point. Furthermore, CHP technology produces greenhouse gas emissions. Taken together, it is considered a review of the potential for CHP should be undertaken, with references removed from the Masterplan (aligning with the advice in Section 15 as outlined).

16.17 On the basis of the above, it is recommended that discussions take place with the site promoters to discuss incorporating the following changes:

- Further investigation of the potential use of both Ground Source Heat and Hydrogen and its application on site with clarification these can be renewably derived energy from onsite sources.
- Review and/or development of the evidence base justifying the current inclusion of CHP for its potential as “appropriate energy infrastructure” within the Masterplan including the “sustainable” sources proposed for use.
- Clarity on the current ownership of the onsite Wind Turbines and how this is not a constraint to delivery of the Masterplan.
- Clarity on the lifespan of the onsite Wind Turbines and how this is not a constraint to delivery of the Masterplan.

**Q11. Do you have comments on the proposed approach to Sustainability?
(Section 18)**

17.1 Only two comments were received directly to Question 11 via the feedback form. The first one considered the proposals as laudable albeit concerns were raised that sustainability is the first area to go when projects falter. The second, more substantive feedback, was received from the Environment Agency (EA). Within their feedback, the EA again flagged the Arc Environment Principles⁴⁴, and, whilst noting the reference to recycling of construction waste within Section 18, they consider the Masterplan should make more reference to the principle of more efficient use and management of waste and resources as explicitly outlined within the Arc Environment Principles.

17.2 The EA also noted, and welcomed, references to the target for all new buildings on site to be BREEAM ‘Excellent’ and have EPC Ratings of ‘A’ to ensure they are energy and water efficient. The EA also advised that the water efficiency measures in the form of rainwater harvesting, water conserving sanitary ware, water saving taps and a water leak detection system are considered in line with the Arc Environment Principle of having ambitious water standards.

17.3 Notwithstanding this, however, the Environment Agency fed back that although this Section references the recycling of construction waste, the Masterplan as a whole could make more reference to the Arc Environment Principle of more efficient use and management of waste and resources.

17.4 In addition to these two formal responses to Question 11, feedback was provided to the overarching “Renewable and Low Carbon Energy” section, on the topic of “Sustainability” (that is, responses were received which were not

⁴⁴ SEMLEP (2021) Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc (online). Available from: https://www.semlep.com/modules/downloads/download.php?file_name=2306&msclid=f20850eecd211ec861a782085808cb0

in the Question 11 box on the feedback form) so for completeness these references are included here on the basis of relevance.

- 17.5 Further to this, a lack of suitable footpath/cycle route connecting to nearby development to the east of Kettering, Burton Latimer and Finedon was raised within the proposals by way of flagging a perceived lack of sustainability in this respect. Furthermore, the loss of green space and impact of increased traffic on local air quality was flagged as a “sustainability nightmare”. Linked to the preceding feedback another comment raised concerns that “sustainability ideals go out the window” once planning permission is granted.
- 17.6 Comments on this topic were also received via email. Similar to the above, concern was raised that traffic pollutant density would outweigh the sustainability of the development. Concern was also raised that the proposals appear to prioritise short-term economic gains over the long-term sustainability and conservation of our natural resources. In contrast, the North Northants Green Party welcomed the ambitions for new buildings on site to target BREEAM “Excellent” and EPC ratings of ‘A’.
- 17.7 Finally, comments on the sustainability of the proposals were also received via feedback to the Masterplan “Vision”. Specifically, *“Employment Zone North and South are just vast, imposing swaths of B2 & B8 warehouses, they have nothing to do with vision of sustainability, minimising the impacts of development or supporting low carbon development. These are high carbon, truck supplied warehouses that will dramatically increase pollution the local area, which do not help the Climate Change and Environment Emergency declared by North Northamptonshire council”*.

Q11 - Officer response and recommendations

- 17.8 Through this review, it is clear that a number of respondents have considered the issue of “Sustainability” in the round and not specifically the content of Section 18 of the Masterplan. However, it is clear that amendments could be made to Section 18 with references made to the Oxford-Cambridge Arc Environment Principles, specifically in respect of making more efficient use, and management, of waste and resources.
- 17.9 On the basis of the above, it is recommended that discussions take place with the site promoters to discuss incorporating the following changes:
- The inclusion of reference to the ‘Shared Principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc’, including reference to / making provision for more efficient use and management of waste and resources.
 - Review of proposed cycle links with a view to potentially extending these out.

Development and Design Principles

Q12. Do you have comments on the Site Assessment? (Section 7)

- 18.1 Section 7 makes clear that the Site Assessment section was informed by the “Site Analysis, Opportunities and Constraints” document which, alongside individual technical assessments, aided identification of what areas of the Energy Park site are deemed most suitable for each aspect of development, with identified constraints used to determine the location of these⁴⁵.
- 18.2 In terms of responses to Question 12, there were limited representations received which answered this directly. One respondent acknowledged that whilst proposed access off the A510 may be the most appropriate, concerns were raised about the impact on this from an amenity perspective to existing residents in the locality, most notably at the Grade II listed Woodford House. Specifically, concerns were raised about increased traffic in the area, including construction vehicles, and linked issues including congestion and noise. In terms of site assessment in this respect, a request was made to ensure any future planning applications are accompanied by management plans covering the construction period and that any damage to local road surfaces is remediated prior to the occupation of any new buildings permitted on site. The same respondent also raised paragraph 104 of the NPPF which sets out that appropriate opportunities for avoiding and mitigating any adverse effects (of traffic), and for net environmental gains should be considered.
- 18.3 Additional feedback raised concern about road pollution and also the lack of published transport assessment.

Q12 - Officer response and recommendations

- 18.4 As outlined at paragraph 24.5 (below), the proposals at Kettering Energy Park will increase traffic movements in the area. In response Section 11 of the (Access and Movement Framework) outlines proposals to improve bus connectivity to the site to offset car use (and facilitate modal shift) as well as making provision for a cycle link to Burton Latimer and permissive public routes north and south of the site.
- 18.5 The potential impacts of development, and response to this, from a traffic perspective is being refined through a Transport Assessment the site promoters are developing alongside NNC Highways and Highways England in consideration of both the local and strategic road networks. In response to feedback received, it is correct that this Transport Assessment was not published for consultation alongside the Masterplan albeit this was due to late amendments made to the latter prior to publication which made this work outdated. As outlined at paragraphs 19.11 - 19.16 below, this work has subsequently been updated and is being used to determine the impact of the proposals on the local road network with a view to gauging what interventions

⁴⁵ These Site Constraints and Opportunities are also outlined at Section 6 of the Draft Masterplan Document.

may be required in response (albeit the headline summary is that capacity exists on the local road network to accommodate the development proposals). This work is still under review presently and will accompany any subsequent planning application which may come forward at the site.

- 18.6 Paragraph 19.15 also outlines the proposed approach being taken to develop the Public Transport Strategy associated with the site. Through its response to the consultation, NNC Highways confirmed they are working in liaison with the promoter's transport consultants in undertaking transport modelling pertaining to the development proposals. Subsequent to this consultation feedback, Planning Officers have been in direct liaison with NCC Highways and the promoter's transport consultants to discuss outputs from the Transport Assessment (summary available at paragraphs 19.11 - 19.16 below) where it has been confirmed the work undertaken to date is technically robust albeit there are some minor adjustments which need be agreed between both parties (however these are not expected to make much difference to overall results/ assessment).
- 18.7 On the basis of the above, it is recommended that discussions take place with the site promoters to discuss the following:

- Publication of Transport Assessment outputs for public review.

Q13. Do you have comments on the proposed access and movement framework? (Section 11);

- 19.1 Responses to Question 13 were relatively limited in terms of direct feedback albeit more expansive comments were received via email. In terms of the former, there were concerns raised about the extra traffic generated through the development proposals and the impact of this on the A510 both in terms of people who live in, or proximity to, the settlement of Finedon (noise, air pollution, road safety/ accidents) and also the A510 itself (including Woodford House). Feedback was also received about the proposed use of J11 of the A14 with concern raised as to the appropriateness of this junction for HGV use.
- 19.2 In relation to access and movement, the Environment Agency (EA) noted that reference is made on page 20 of Section 11 to improving cycle links to the site. Further to this, the EA flagged the potential to again work with the River Ise Partnership, who are aiming to develop a cycleway of over 21km in length along the Ise Valley between Corby and Wellingborough (funding has already been secured by NNC for Nene Rivers Trust to deliver the first section of this cycleway in 2023/24). The EA also flagged the "North Northants Greenway Strategic Masterplan"⁴⁶ which shows the proposed Greenway network which indicates part of this runs between Burton Latimer and Raunds via Great Addington (referred to as 'Route 13') and through the Energy Park site itself. On this basis the EA consider this route should be reflected in the Masterplan

⁴⁶ This was reported to NNC Executive on 14th September 2023 (Item 500). The report is available here: <https://northnorthants.moderngov.co.uk/ie/ListDocuments.aspx?CId=142&MId=1528&Ver=4>

as part of the wider footpath and cycle network. Linked to this feedback, in terms of active travel, the inclusion of active travel/pedestrian and cycle routes within Section 11 was welcomed (where referenced).

Road Improvements

- 19.3 As outlined, more comments on Section 11 were received via email. Kettering Town Council recognised that intended site access was from J11 of the A14 but considered measures to ensure that traffic did not use the A6 and particularly did not have access to the site through Finedon were vital and advised some upgrading of the highway infrastructure at Finedon would be essential alongside significant upgrade of the A510 between the site entrance and J11 (of the A14). On this theme a number of respondents raised the issue of a bypass for Finedon. Finedon Town Council advised that Finedon is the only town on the A6 for 100 miles which does not have a bypass and that it begs for improvements to the road infrastructure before commencement. A number of other respondents considered a bypass was required for Finedon in order to mitigate the impact of traffic associated with the proposals. Linked to this, there was scepticism that users of the Energy Park would look to avoid Finedon (as outlined in Figure 11), particularly if they are travelling to/from the direction of Rushden or Wellingborough and other representations considered the A510 required dualling in some capacity due to traffic associated with the proposals.
- 19.4 In terms of proposed site access, a number of respondents took issue with the proposed roundabout access off the A510 citing its location as being some distance from J11 of the A14 and the location of this having status as an accident blackspot. A number of respondents also questioned why Junction 10a of the A14 is not included as part of the proposals (including Great Addington Parish Council), given this featured in previous promotional material relating to the site (undertaken in 2014) and is outlined in the Joint Core Strategy as a Key Strategic Infrastructure Project directly related to Kettering Energy Park. Indeed, feedback was received that J10a (or the A6) would provide a more appropriate access into the site to negate impacts of traffic on local roads and settlements.
- 19.5 On a linked theme a number of respondents raised issue that no infrastructure improvements were proposed to the local road network as part of the Masterplan, with it also outlined that new road infrastructure and improvements has been delivered along a number of junctions of the A14 to accommodate development. To this end, there was criticism that the Transport Assessment outlined within Section 11 was not published for review alongside the Masterplan.

Bus Connections

- 19.6 Concern was also raised regarding the proposed provision of buses/bus networks to the site. A number of respondents highlighted that there is no existing bus service on the A510 (corroborating the point made within Section

11 of the Masterplan), so there was a degree of scepticism improved bus provision would be achieved via “the extension of existing routes”.

Walking/Pedestrian Access and PROW / Bridleways

- 19.7 In terms of reference to Public Rights of Way, Bridleways and Footpaths, there was criticism that the proposals would adversely affect the local area in that the existing footpaths and bridleways which cross and adjoin the site would “become unused as the obtrusive industrial site will dominate the landscape and folk won’t walk to see that rather than the lush, green countryside they currently enjoy”. Further feedback was that the proposals in respect of bridleways and footpaths represent a loss of amenity for users and the contribution to mental and physical health, and overall wellbeing, these currently provide. Indeed, feedback considered these as key, well used, amenities in this location. On this theme there was also criticism at a lack of linkages made to the site other than to Burton Latimer, with feedback that the site is isolated in this respect.
- 19.8 In terms of reference to “Public Rights of Way” within Section 11, feedback was received which was critical of the proposals for the two new permissive routes (as put forward to enhance the, amended, existing public rights of way). Specifically, this feedback was critical of the reference within the Draft Masterplan that these “will not be formal rights of way as the land will be subject to ongoing/farming management so more flexibility is needed for these routes”. That is, feedback considered this as “completely unreasonable” as the implication of this proposal is that these routes would be at the whim of the management, and usage could be suspended as and when required to deny unfettered access to public rights of way”. Linked to this, the Council received details of previous correspondence a respondent had made to Burton Latimer Town Council in relation to a proposed new route for existing Footpath UA6 (as put forward in November 2022) with this correspondence suggesting an alternative route for consideration.

Cycle routes/connections

- 19.9 The proposed provision of new cycling access was broadly criticised where responses on account of those linkages offered through the Masterplan being limited to Burton Latimer. It was also fed back that the site location offered limited opportunities to cycle from elsewhere/other settlements unless using the A510 (and this was flagged as unrealistic due to the expected increase in traffic on this road, linked to the proposals. Furthermore, representations were received that due to the isolated/far out location of the site, this was considered to serve as a deterrent to take up of this transport mode, facilitated in part as the proposals do not serve to address this (and could actually lead users to use their own transport). Notwithstanding this, however, some solutions were suggested to these issues through representations. The NNC Economic Development team advised that sustainable access is important and that the site should be considered as part of the wider Kettering Local Cycling and Walking Infrastructure Plan and be connected by segregated

active travel links built to LTN 1/20 standard (not as shown in Section 24). On this theme, Woodford Parish Council consider that for the safety of cyclists, the A510 must be provided with a cycle path between the A14 and Finedon, thus enabling those using cycles to reach the site whilst also enabling access via side roads from Kettering, Cranford, Great and Little Addington, Woodford or even Thrapston. The EA also flagged the potential to link into wider (strategic) Greenway proposals (as per paragraph 19.2 above).

Sustainability of the site location

19.10 Continuing a theme outlined in the above paragraph, comment was received that the proposals are unsustainable, both in respect of site location (as this is not adjacent to a Growth Town or Market Town - meaning the site is not easily accessible from a cycling or walking perspective), as well as the “Proposed Shift Change Bus” linking to Corby and Northampton which implies staff will need travel some distance to work at the site. Combined, these factors are considered to facilitate increased vehicular movements at a time when emissions are required to be reduced. On a linked theme a number of comments raised issue at how the proposals can be considered “green” given the number of traffic movements associated with them.

Q13 - Officer response and recommendations

19.11 The promoters, in conjunction with NNC Highways and National Highways, have been undertaking transport modelling to gauge the impact of the proposals outlined within the Masterplan. As part of this, NNC has been provided with a “Traffic Modelling Summary” technical note (dated 24th August 2023) which has been produced by David Tucker Associates (the promoter’s expert consultants in this respect). This note represents an update to an earlier round of modelling undertaken in March 2023 and has been updated to consider development of 370,000 sq m on the basis of 70% B8 and 30% B2 with allowances for stand-alone offices and other Class E employment uses such as Research and Development as well as mezzanine floorspace). On the latter point, inclusion of mezzanine floorspace is not typically undertaken as standard as, according to the promoter’s transport consultants, there is not a direct correlation between the provision of mezzanines and a higher number of traffic movements, or even a higher number of employees. However, given the sensitivities raised during consultation, the promoters considered a comprehensive approach as most appropriate to ensure the potential impacts of development are fully considered and this is why this provision has been made.

19.12 The transport modelling note seeks to establish the likely impacts of development as proposed at the site. Key outputs are that in respect of the Northamptonshire Strategic Transport Model (NSTM), the modelling shows that the main traffic draw for development is on the A14 west towards Kettering with additional traffic flow in this direction (albeit no capacity issues are shown at J11). Additional demand is also created through Finedon, particularly at the A6/A510 junction, and the advice is that further appraisal

will be required to determine the precise form of mitigation required. Despite this, in general terms, modelling has identified no significant changes in capacity at individual junctions. VISSIM modelling has also been undertaken to gauge impacts on the strategic road network which National Highways is responsible for and covers J7 to J11 of the A14 plus sections of the A43, A509 and A6 corridors. This modelling has concluded that the overall impact of the masterplan proposals is negligible, with the A14 continuing to operate with small differences when the addition of development traffic to and from the energy park site is considered. These results also indicate that J11 of the A14 will continue to operate effectively with the development traffic and no improvement works have been identified as being necessary at this junction. In undertaking this modelling work, all known committed developments, including that proposed at Kettering, Wellingborough and Rushden, have been included to ensure that local cumulative traffic impacts are accounted for when reaching the conclusions outlined.

- 19.13 The impact on nearby villages is also addressed through the same Traffic Modelling Technical note (with the NSTM used to determine this), with Woodford, Great Addington and Little Addington considered. In summary this note concludes that there is not a significant increase in vehicles going either to or from the Energy Park or through these locations.
- 19.14 Notwithstanding this, however, the note makes clear that detailed modelling work has already started to consider a number of individual local junctions, all off the A510 (specifically the A510/ A6 Finedon Roundabout, the A510/ Site Access roundabout, the A510/ Woodford Road priority and the A510/ Cranford Road priority). Initial proposals include a traffic signal crossroad junction being proposed at the A510/ A6 Finedon Roundabout⁴⁷ with some local mitigation measures considered likely at the A510/ Woodford Road and A510/ Cranford Road. These proposals are being worked up with NNC Highways currently and the intention is the results will be included within the Transport Assessment that supports any subsequent planning application.
- 19.15 Finally, this note also considers “Sustainable Transport Measures” to reduce reliance on the private car. Within it is made clear that discussions are being held with bus operators to consider options for providing services to the site, with options including specific bus routes from established operators to more demand responsive services from newer operators. The potential for including such services as part of the proposed development will continue to be assessed in more detail for inclusion into any subsequent planning application, which will most likely form part of a S106 package in addition to other improvements to cycle and walking provision/ infrastructure and such opportunities as car sharing.
- 19.16 Therefore, although it is acknowledged that traffic movements are expected to increase in the locality as a result of the proposals within the Masterplan, transport modelling has determined that this can be accommodated on both the local and strategic road networks, with improvements identified as

⁴⁷ This is in place of the existing roundabout.

necessary where impacts may be more localised. As outlined above, this modelling continues to be developed, and is therefore evolving, and this will be reflected within the Transport Assessment that supports any subsequent planning application.

- 19.17 In response to feedback from the Environment Agency, it is considered appropriate to make links to the work of the River Ise Partnership to determine where opportunities exist to link the proposed cycle-pedestrian route, as outlined in Section 12 of the Masterplan, to the Ise Valley cycleway. A similar review is also recommended of the North Northants Greenway Strategic Masterplan as also flagged by the EA. This is considered necessary to facilitate a strategic enhancement of this route to the benefit of both future users both internal and external to Kettering Energy Park and enable modal shift. On a linked theme it is considered appropriate that review of the Kettering Local Cycling and Walking Infrastructure Plan is undertaken to ensure relevant links are made within the Masterplan.
- 19.18 In respect of feedback to proposed changes to the existing Public Rights of Way, the Council is aware of an ongoing application to amend the Definitive Map to incorporate an alleged public bridleway along a route which, if successful, is likely to impact the Masterplan proposals as published (this application has not been made by either the landowner or promotion team linked to the Energy Park site). It is therefore considered critical that this fact is acknowledged within the Masterplan with a view to making changes as necessary. Notwithstanding this, however, it is considered inconceivable that these changes, and the proposed rerouting of the bridleway within and adjacent to the Employment Zone and other on-site buildings and infrastructure, will not represent an adverse effect on the amenity of footpath users in future (if these proposals gain planning permission).
- 19.19 On the issues of Junction 10a of the A14, it is correct that the JCS identifies this as required in relation to development at both Kettering East (Hanwood Park) and Kettering Energy Park⁴⁸ albeit the Masterplan does not make provision for this as it does not presently have Government support (it was excluded as a project from the Road Investment Strategy (RIS2) 2020-2025). However, it is also true that without J10a, Hanwood Park cannot progress beyond 2,700 dwellings as a result of a planning condition, leaving the site half-finished. This is something which is obviously unpalatable and a solution is being sought, with discussions ongoing to have the scheme included in the next round of RIS funding (RIS3, 2025-2030).
- 19.20 On the basis of the above, it is recommended that discussions take place with the site promoters to discuss incorporating the following changes:
- Review of existing land use proposals within Section 11, and elsewhere as appropriate, with a view to securing future linkages between the Energy Park and the cycleway and Greenway being

⁴⁸ This is outlined at both Table 8 (Key Infrastructure Projects) and the Key Diagram of the JCS.

developed by the River Ise Partnership and North Northamptonshire Council respectively. Relevant references should be made here, and throughout the rest of the document, as necessary.

- Further to feedback from NNC's Economic Development Team, ask that the promoters identify how the scheme links into the Kettering Local Cycling and Walking Infrastructure Plan in respect of segregated active travel links (built to LTN 1/20 standard) and make amendments to Masterplan as necessary.
- Inclusion of Transport Modelling Outputs within the Masterplan (alongside publication of these documents for public review)
- Liaison with NNC's Definite Map team to understand and incorporate proposed changes to the Footpath UA6 within the Masterplan as necessary.
- Review of feedback in respect of the proposed permissive routes.

Q14. Do you have comments on the proposed Development Boundaries? (Section 14)

- 20.1 Policy 26 of the JCS relating to proposals at Land at Burton Wold makes it a task of a future Masterplan for the site to define development boundaries. This boundary is subsequently outlined at Figure 14 (Development Boundaries) of Section 14 and is also presented at Figure 8 (Green Infrastructure Strategy) within the Masterplan.
- 20.2 Only one response was received to this specific question via the feedback form and this queried the need for a larger masterplan boundary as opposed to the development area.
- 20.3 Historic England, via email, sought further detail on the technical assessments undertaken to inform production of the development zones specified in Section 14 (and 15) of the Masterplan including clarity on whether these include specific assessments for heritage and archaeology, including any methodology for how conclusions have been arrived at.
- 20.4 In addition to the above, comments on the proposed development boundaries were provided as feedback to other questions. Specifically, comment was received, via Q18, that the Masterplan meets the Policy 26 requirement to "define development boundaries". Other comments included a query on the rationale for extending the scheme boundary down to Cranford (Q1 - Vision) and a query on the need for both a masterplan and development boundary if the intention is not to develop outside of the development boundary (received via "general comments" on the Environment and Biodiversity section).
- 20.5 Finally, as a linked area of feedback, comment was received, again via Q18, that the extent and scope of the Energy Park is only marked as a single point (yellow star) on a map (i.e., the Key Diagram) located between Kettering and Rushden in the JCS and that this diagram does not define either the boundary of the site or its status as a key strategic employment site.

Q14 - Officer response and recommendations

- 20.6 In response to this feedback, it is correct that in terms of local planning policy the JCS does not allocate the site specifically as a strategic employment site and neither is a development boundary established in the document. Rather, Policy 26 makes clear that defining the development boundary is a task required of a future masterplan for the site and this is addressed within the Masterplan as outlined.
- 20.7 On the basis of the above, the issue of development boundaries is an important issue to be addressed through the Masterplan (as per the provisions of criterion 1 of JCS Policy 26 as it relates to Kettering Energy Park). In publishing both a “Masterplan Boundary” and a “Development Boundary” the Masterplan is considered to address this requirement. In respect of the Masterplan Boundary extending towards Cranford, Figures 9 and 14 show that the element of this which does so comprises the area proposed for Biodiversity Net Gain where no built form development is expected to occur. However, on the basis of feedback received it is acknowledged that further clarity could be provided within to explain these differences and address concerns raised via consultation.
- 20.8 On the basis of the above, it is recommended that discussions take place with the site promoters to discuss incorporating the following changes:
- Provide clarification on the two boundaries proposed within the Masterplan.

Q15. Do you have comments on the proposed approach to Building Heights? (Section 17)

- 21.1 The height of the buildings proposed in the Masterplan was one of the more recurring areas of feedback received through consultation. Specifically, where respondents raised this issue, there was common agreement that building heights of up to 30m is too high and that these would have a detrimental impact on both the immediate and wider area. Furthermore, in respect of the Round House, despite the proposals to locate lower-level buildings adjacent to this to lessen impact, it was highlighted that the buildings proposed beyond these lower structures would be significantly taller and dominate the skyline. The impact on the Grade II listed Woodford House is also raised in this respect.

Q15 - Officer response and recommendations

- 21.2 It should be noted that Burton Wold denotes one of the higher parts of the county consistent with its status as one of three identified character areas which form the wider “Clay Plateau” landscape character type within the Northamptonshire Current Character Assessment. Notwithstanding the pre-existing wind-turbines on site, development at this location will be prominent in the landscape by virtue of site topography (the site sits on a raised plateau), and the height of the buildings proposed. Within this Assessment it is noted that Burton Wold is identified the lowest area of plateau (at 90m above sea

level) relative to Naseby and Sywell Plateaux (which comprise the other character areas associated with the Clay Plateau landscape). The Development Boundary (where the main Employment Zones are located) is located exclusively within the Burton Wold landscape character area.

- 21.3 To aid the development of proposals at the Energy Park, the promoters have prepared a Strategic Visual Review which provides approximate confirmation of the topographic (spot) heights associated with the Energy Park site⁴⁹. This document also reviews the topography of the site in its wider context and in doing so it confirms that the Energy Park site has an elevated status relative to most (albeit not all) of the wider area. Specifically, this study outlines that, prior to any development associated with the Masterplan, the site sits higher than parts of Finedon and Irthlingborough and is notably higher than Cranford and the Addingtons and settlements set in a valley adjacent the River Nene. On this basis, views from these locations may be susceptible to more pronounced visual and landscape impacts associated with the proposals (to some extent), particularly given that the Development Zones are located to the east of the Development (and Masterplan) boundary.
- 21.4 To inform development of the Masterplan, a “Site Analysis, Opportunities and Constraints” document has been prepared by the promoters to consolidate outputs from various technical studies undertaken and guide locational decisions within the Masterplan. Within this document, it is clear that the area of the site with strongest development potential has been effectively identified by virtue of existing constraints (namely the existing wind turbines, overhead power lines and consented solar farms (which are proposed to be rationalised in part)), as well as the desire to maintain part of the site for continued agricultural use. Given this context, and mindful of both topography and adjacent Listed Buildings, the Development Zone has been located back from the southern and eastern boundary of the site and supplemented with a landscape buffer adjacent to the more visible aspects of the site and adjacent Listed Buildings⁵⁰. This screening has been further enhanced through the provision of landscape buffers around the perimeter of the development zone, with wider buffers to the south eastern and eastern boundary⁵¹.
- 21.5 Notwithstanding these interventions, however, the fact remains that the buildings proposed within the Development Zone are not insignificant in respect of height (as verified through consultation responses received). Indeed, the Masterplan acknowledges that any development at this site will have some form of landscape and visual impact.⁵²

⁴⁹ A spot height of 87m above sea level is presented within the Development Boundary at 2089-20-Figure 2. This extends to 93m when the wider Masterplan Boundary is included.

⁵⁰ The Built Heritage Assessment also advocated locating smaller units with lower ridge heights in closest proximity to The Round House (e.g., office buildings, smaller commercial warehouses) so as to minimise the impacts as far as possible on this (Grade II) Listed Building

⁵¹ Incorporating grassland and tree planting

⁵² This is further clarified at page 25 of the Site Analysis, Opportunities and Constraints document which states “Some visibility of the proposed development at the site will be inevitable given that the site is currently characterised by open arable farmland”.

Promoter feedback

- 21.6 Further to the above, in response to consultation feedback received, and ongoing discussions with Place Services⁵³, the promotion team advise that the building heights proposed within the Masterplan are necessary in order to accommodate potential occupier requirements as there are a lack of sites for such units for B2 and B8 occupiers. Specifically, the advice is that business operators require large internal volumes that can be adapted to accommodate different operations/purposes in accordance with occupier demand, so the Masterplan incorporates a degree of flexibility with regards to building heights. The promoters also reiterate that land uses within the Masterplan have not been defined by building heights but in response to existing constraints and those areas considered most suitable to accommodate different employment typologies.
- 21.7 The promoters also advise that the heights of proposed employment units will be considered further through technical studies prepared to inform a future planning application. These include Design Codes, parameter plans and a Landscape and Visual Impact Assessment.
- 21.8 Obviously wind turbines and pylons are located at the Energy Park site already and these form prominent vertical elements on the otherwise open agricultural landscape associated with the Burton Wold character area. Beyond these features, however, on the basis of the preceding analysis, although mitigation measures are proposed within the Masterplan, it is difficult to discern how buildings of the scale proposed are sensitive to the landscape setting or enhance the distinctive qualities of the Burton Wold landscape area / Clay Wolds character type. Therefore, given both the preceding analysis and level of consultation feedback received to this issue, it is suggested that the height of buildings proposed within the Masterplan are subject to review, linked to earlier comments at paragraphs 11.11 - 11.13 in respect of the strategic scale of development and consistency with JCS Policy 26. Notwithstanding this, however, a degree of pragmatism may be required in doing so because, as outlined within the Masterplan, given the site is an elevated plateau and B8 uses (storage and distribution) constitute the major element of the proposals, irrespective of what buffers and landscape interventions are proposed, these will be difficult to mitigate from a visual perspective. Furthermore, the JCS does identify the site for development irrespective so there is already recognition the site can accommodate this.
- 21.9 In respect of Woodford House, this was specifically assessed as part of a "Built Heritage Assessment" prepared to identify the significance of those heritage assets likely to be affected by the proposed development of Kettering Energy Park⁵⁴. Through this work, it was concluded that there is no intervisibility between Woodford House and the Energy Park site as the latter is surrounded by substantial mature planting⁵⁵. Specifically, the Built Heritage Assessment concluded that no visual or functional relationship is determined

⁵³ The Council's retained environmental assessment consultants

⁵⁴ With consideration given to any contribution made by the respective settings of the heritage assets.

⁵⁵ Woodford House was also measured as being located 1.2km from the Energy Park site

to exist between the two locations as the Energy Park site does not form part of the setting of the listed building and is not considered to contribute to its significance. On this basis it is concluded that no mitigation measures are considered necessary. In contrast this report did also identify those heritage assets within 1km which do form part of the Energy Park site – most prominently The Round House – and concludes that the Masterplan embeds mitigation measures that are considered to reduce impact on it and outlines that the effects of development will be assessed in more detail as part of a planning application (which will incorporate controls over building heights, materials and issues such as external lighting to minimise any potential harm to the significance of this listed building).

21.10 Notwithstanding the above, however, the promoters recognise that further work will be undertaken to assess the impacts of development as part of developing a planning application including the preparation of a Landscape and Visual Impact Assessment. The promoters have also committed to preparing a Design Code to support a future planning application.

21.11 On the basis of the above, it is recommended that discussions take place with the site promoters to discuss incorporating the following changes:

- Review the height of Buildings proposed within the Masterplan in light of consultation feedback (it is acknowledged that the further work associated with a future planning application may be the basis for this work, as outlined above). This review is linked to concerns about the quantum of floorspace proposed within the Masterplan, as flagged within.

Q16. Do you have comments on the proposed approach to Building Design Principles? (Section 19)

22.1 Three separate responses were received to this question via the feedback form and these focussed on specific topics as set out in Section 19 of the Masterplan. In respect of “External Lighting” the feedback raised a lack of commitment to designing this to take account of species like bats, butterflies and moths with the focus instead on operational requirements whereas use of demand activation will only be “explored”. In the same representation concerns were raised that there were no hard references to adherence to building standards such as Passivhaus. Finally, the remaining two representations made reference to the potential design of new buildings on site with concerns raised that new warehousing will not be aesthetically pleasing.

22.2 Building on the issue of “Lighting” a response was received via email which cited a recent CPRE “light survey” which “showed the local area was already badly light polluted”. However, no further details were provided on this (and the CPRE did not reference this within their formal response). Linked to this, another email representation raised the issue of 24/7 lighting associated with industrial warehouses alongside lighting associated with adjoining roads, car parks and paths (with cars and industrial vehicles adding to this), causing light

pollution and also being harmful to wildlife including bats and owls. This point was augmented by feedback from Woodford Parish Council which raised concerns about the proposed warehouses being visible across many parts of the Nene Valley at night once lighting is active on site and suggests use of exterior lighting that is sensitive. Finally, the Wildlife Trust advised that although the proposals consider external lighting to maintain dark corridors, these do not consider spillage of internal lighting, for example from the office sections of the proposed warehouses and felt that this needs to be considered.

Q16 - Officer response and recommendations

- 22.3 There was limited feedback to the proposed approach to Building Design Principles in the context of the overall number of representations received. Nevertheless, where this has been received it is clear that the impact of light pollution is a local concern from both the perspective of wildlife and how this could affect both the local and wider area (including the cumulative impact of warehouse development). Furthermore, the concern raised about the proposed approach to building standards is noted and it is considered that this is something that could be further clarified in the Masterplan with a view to informing a future planning application at the site. In doing so, it is suggested that the climate emergency, and the “green credentials” of the site should be key considerations in establishing the exact approach to be taken.
- 22.4 On the basis of the above, it is recommended that discussions take place with the site promoters to discuss incorporating the following tasks and/or changes:
- Review of CPRE light survey as cited in representations.
 - Review of references to “demand activation” with a view to providing further clarity/information on the proposed approach.
 - Further clarity/information on the proposed approach to building standards in the context of the climate emergency, and the “green credentials” of the site.

Q17. Do you have comments on the proposed approach to use of Design Codes and design quality? (Section 21)

- 23.1 Only two comments were received to Q17 via the feedback form and both were in relation to the use of Design Codes. The first comment emphasised the dangers of Design Codes when prepared and used by those with little architectural training. The other comment was received from the Environment Agency who welcomed the proposed approach to Design Codes as these are considered to have worked well on other major developments in North Northamptonshire. No additional comments were received on this topic via email.

Q17 - Officer response and recommendations

- 23.2 On the whole, no issues were raised with the approach proposed in the Masterplan to make use of Design Codes to support the delivery of quality development at Kettering Energy Park. Indeed, as the feedback from the Environment Agency outlined, these are already being used successfully in other major developments across the area.
- 23.3 On the basis of the above, no changes are proposed to the use of Design Codes and design quality beyond that already stipulated in Section 21 of the Masterplan.

Q18. Other issues raised (outside of Consultation Questions)

- 24.1 As outlined at paragraph 5.12 above, through email submissions feedback was received on issues not covered in the Masterplan or consultation questions. To ensure equality of opportunity for feedback to be considered, key themes in this respect are outlined below.

Traffic and Transport

- 24.2 As outlined within, the major thematic area of responses to the Masterplan related to transport and traffic and the impacts of the proposals in this respect. On this theme, feedback was critical of the fact no accompanying transport assessment was published alongside the Masterplan for interested parties to review. It can be confirmed that this did not happen as prior to publication of the report taken to EAP on 27th March 2023, some late amendments were made to the Masterplan insofar as a 70% B8 (Storage and Distribution) floorspace figure was inserted by the promotion team. This had the effect of making the transport modelling work undertaken prior to this change outdated so a revised version which reflected the late changes to the Masterplan was unavailable at this time. Notwithstanding this, however, NNC Highways were involved in the prior work undertaken alongside the promotion team's transport consultants and acknowledged this within their consultation response⁵⁶.
- 24.3 Further to this, work has been undertaken to update the transport assessment to reflect the revised quantum of development associated with the Masterplan, and the Council was presented with a "Traffic Modelling Summary" technical note (dated 24th August 2023) which has been produced by David Tucker Associates. The outputs of this are outlined at paragraphs 19.11 - 19.16 above and do not need repeated here. However, NNC Highways consider that these do not raise issues which they are unduly concerned about (confirming their earlier consultation response), as a technical solution can always be found. On this basis, Planning Policy is therefore satisfied that the Masterplan as consulted upon is proportionate and justified for the stage of its

⁵⁶ This response outlined that preliminary assessment work had been undertaken and that this will be followed by more specific and detailed assessment. Alongside this NNC Highways also advised that work has been undertaken to scope a Transport Assessment to support any future planning application

development. Notwithstanding this, however, the volume of feedback received to the consultation makes clear that issues relating to transport and traffic are a significant local concern, particularly given perceived potential impacts on local roads, junctions and settlements alike. It is therefore considered important that evidence relating to this area is made available for public consumption as and when finalised.

- 24.4 Linked to this theme, a number of respondents referenced 22,000+ traffic movements per day on the A510 as well as car parking requirements of 5,500 vehicles associated with the development. These figures, although very precise, were not published within the Masterplan or supporting material for consultation. On review it appears that these figures were published within the Petition⁵⁷ received by the Council and these look to have been inferred from review of the planning permissions associated with the nearby developments at Symmetry Park and Segro. It is therefore important to reiterate that these figures do not relate to the current proposals.
- 24.5 Notwithstanding this however, given the 22,000+ vehicle trip figure was quoted by a number of individuals, the Council specifically asked the promoters Transport Consultants for the equivalent vehicle trips per day forecasted as a result of the (revised) scale of development proposed within the Masterplan. In response it was advised that 16,300 (new) vehicle trips per day have been calculated in relation to the proposals at KEP (with housing growth at Rushden and Hanwood Park expected to contribute to employee movements in this respect). As outlined elsewhere in this report, Transport is the largest source of emissions at both the national and local levels, and at a time when Councils are legally required to reduce emissions, the sustainability of development proposals which would create an additional 16,300 vehicle trips per day must be questioned in light of the NPPF requirement to “contribute to radical reductions in greenhouse gas emissions” (paragraph 152).

Infrastructure upgrades

- 24.6 Another linked area of feedback with regards to traffic and transport was criticism that the Masterplan contained no provision for road infrastructure upgrades associated with the proposals (particularly as other development sites along the A14 have necessitated these). In response this is something that will be considered as part of the Transport Modelling work outlined above and will be determined via any future planning application and S106 requirements. That is not to say that upgrades in the locality will not be required, particularly in light of the cumulative impacts of development. However, the specifics of any upgrades will be determined via a future planning application, if forthcoming.

⁵⁷ As detailed at Paragraph 5.4 within.

6. Conclusions

- 25.1 As outlined at the start of this report, concerns were previously raised with EAP on a number of issues regarding the Masterplan for KEP. In summary these covered the strategic scale of B8 (Storage and Distribution) proposed at a site which has not been tested/assessed, and, significantly, is not allocated in the Joint Core Strategy for such uses, the impact of the proposed quantum of development on the North Northamptonshire Local Plan and the lack of detail the distribution of the 5,500 jobs outlined within the proposals. Further to consultation on the Masterplan these concerns remain notwithstanding technical work undertaken by the promoter (and indeed the Council) in the interim. Indeed, from a technical perspective limited issues remain with the proposals (if it accepted that visual and landscape impacts are unavoidable due to development at this Wold location, irrespective of mitigation measures). Notwithstanding the changes/areas of further work suggested within this report, it is considered the issues flagged to EAP previously remain fundamental and, at the time of writing, alternative futures for the site have not been put forward by the promoter. To overcome this issue, it is suggested that further discussion is held with the promoters on the scale and mix of uses at the site – including the B8 element of the proposals - to address concerns raised by Members at the previous EAP meeting and as made clear through public consultation.
- 25.2 On this basis, consistent with paragraphs 11.11 - 11.13 within, it is suggested that the site is subject to assessment within the evidence base being developed for the North Northamptonshire Local Plan to enable the site to be evaluated on a consistent basis with those other submissions received through the Call for Sites linked to the Housing and Employment Land Availability Assessment (and overcome the lack of assessment previously undertaken for the Joint Core Strategy). As discussed elsewhere in this report there is strong demand for strategic warehousing in North Northamptonshire. It is considered inappropriate that this site, which has not been assessed for its merits from a B8 perspective previously, should proceed in isolation given a review of the Local Plan is underway and the fundamental concerns which remain (including the carbon emissions associated with the significant vehicle movements the site is projected to generate at a time the UK needs to be reducing emissions from Transport).

7. Issues and Choices

- 26.1 This report has focussed on examination of feedback received following a 7-week public consultation held on the provisions of the Masterplan prepared for Kettering Energy Park. In doing so it has covered issues outlined in the Report previously taken to EAP on 27th March 2023 as well as addressing other feedback received through consultation. In light of the preceding discussion points of the current Report (including suggested changes to the Masterplan), Members are invited to consider the contents of this report and the proposals contained within it and provide feedback to enable the site promoters to finalise the Draft Masterplan Document ahead of next steps in

the process. Another option available to the promoters would be to seek an allocation in the North Northamptonshire Local Plan with the site being subject to assessment through the HELAA as part of the development of the plan.⁵⁸

8. Next Steps

27.1 As outlined, once the Masterplan has been subject to comment, it is intended the document be forwarded to Planning Committee (North) for approval, following which it is understood the promoters shall submit planning applications to the Council, of which the Masterplan will form part, for its consideration. To facilitate this process, it is suggested that officers oversee relevant changes, as outlined in this report, (any those suggested by PCEAP), are made to the Masterplan. Notwithstanding this, however, if the Masterplan is not approved by the Council, an alternative option is presented at paragraph 26.1 as a route to progressing development opportunities at this location.

9. Implications (including financial implications)

Resources, Financial and Transformation

28.1 The costs associated with the preparation of the Masterplan have been borne by the scheme promoters. In terms of the Council's involvement, NNC officer time and specialist advice sourced by the Council, have been funded via a Planning Performance Agreement between the Council and First Renewables Ltd. The cost of material supplied electronically and in print for the proposed consultation will be accounted for within these same budgetary costs.

28.2 In terms of transformation, officers and Members have committed time and effort to inputting into the shaping of the Masterplan with the promoters. The benefit this has brought is that the product before Members today is thought to be of a far superior standard than it would otherwise have been if both the promoters and Council hadn't proactively supported work inputting into the product. The expectation is that this front-loaded and transparent approach to working will deliver social, environmental and economic benefits as a result.

Legal and Governance

28.3 The Kettering Energy Park Masterplan, once approved, will satisfy the requirement for it as specified in Policy 26 of the North Northamptonshire Joint Core Strategy. It will also provide the promoters and developers of the site with a framework to firstly attract investors to the site and guide them in the preparation of planning applications for submission. The Masterplan will

⁵⁸ It is important that whilst the Council may ultimately sign up to the Vision provided by the Masterplan, doing so does not pre-judge determination of applications or other considerations in preparing the North Northamptonshire Local Plan.

also form a material consideration in the assessment of applications by the Council's officers, and Members in determining applications at the site.

- 28.4 The Planning Communities EAP will provide governance in the further development of the Masterplan, after initially having received a presentation from the promoters during the process of developing the Draft Masterplan Document.

Relevant Policies and Plans

- 28.5 Policy 26 (Renewable and Low Carbon Energy) of the North Northamptonshire Joint Core Strategy provides the policy framework for new renewable energy generation for North Northamptonshire. The policy also identifies Land at Burton Wold to serve as a decentralised energy network which will link energy production to existing and new development. It also identifies a series of criteria for proposals to be in accordance with within the Energy Park and requires the preparation of a comprehensive masterplan to be prepared in consultation with the local community and stakeholders, (which is to be agreed by the Council). The Draft Masterplan Document has been prepared to meet this policy.
- 28.6 In terms of the Council's Corporate Plan, the proposals outlined through the Draft Masterplan Document has the potential for making a positive impact on two key commitments. Firstly, in terms of Safe & thriving places it meets the requirements to attract tourism, visitors and inward investment, working with local businesses and partners to support the creation of high-quality, better skilled jobs. For Green, sustainable environment, it demonstrates clear leadership on tackling environmental sustainability and work with communities and businesses to tackle climate change and improve air quality and promote sustainable, active travel. Embed low carbon technology, sustained and improved green infrastructure, and sustainable forms of transport fit for the future.

Risk

- 28.7 The purpose of this report is for Members to review the content of the Draft Masterplan Document, and other supporting information, and comment upon the content. There is a risk that as a result of responses to the consultation, and comments of Members, conclusions cannot be reached which lead to the Planning Committee looking favourably on the Masterplan. However, officers will continue to work with the promoters and stakeholders to ensure that the information presented to Members is fair and balanced, and that suitable amendments are identified for agreement to a Masterplan which Members can approve, to secure a high-quality development for the area.

Consultation

- 28.8 Consultation on the Draft Masterplan Document was extended beyond the agreed Statement of Community Involvement period of 6 weeks, to account for the busy period of bank holidays. The consultation was launched following the

March 27th Executive Advisory Panel meeting and was open until Friday 19th May. Information was provided on the promoter's website, with a link to it from the Council's website. The Council's media and social media channels were also used to ensure that residents and other stakeholders are made aware and directed to the relevant information to allow them to comment on the consultation material.

- 28.9 In addition, an in-person event was held at Burton Latimer Civic Centre on 21st April 2023 to provide interested parties the opportunity to discuss the Draft Masterplan and scheme proposal with the promoters and officers of the Council.

Consideration by Scrutiny

- 28.10 The papers haven't been considered by Scrutiny however, if requested then officers are prepared to prepare a set of papers for the group's consideration.

Equality Implications

- 28.11 An Equalities Impact Assessment screening has not been prepared for this report but will be prepared in consultation with the Council's Equalities team upon publication. The results of this will be reported to Members.

Climate Impact

- 28.12 The Council, having declared a climate and environment emergency in June 2021, is committed to reducing its climate impact both within its own Council buildings and in working with businesses and the wider community to achieve net zero. It is considered that the Draft Masterplan Document, in looking to increase the provision of renewable energy technology at the site is positive alongside the intention to provide features such as a mobility hub, EV charge points, potential bus service and enhanced connections to Burton Latimer with a view to reducing use of combustion vehicles by potential site users. Notwithstanding this, however, transport modelling projects the site will generate 16,300 daily trips (of which 5,400 are projected from HGV traffic⁵⁹). This is a significant volume of trips to a rural site which is currently in active agricultural use (notwithstanding the existing wind farm) and concerns are raised as to the carbon (emissions) implications development of this scale will generate. On this basis, the sustainability of the proposals, on balance, is questioned.

Crime and Disorder Impact

- 28.13 The development will need to consider issues of crime and disorder. This is expected to form a part of submissions made to this consultation, and through the subsequent planning applications that follow.

⁵⁹ This figure does not include any deduction for sustainable transport modes presently. It is anticipated this figure will reduce alongside a supporting Travel Plan informing a future planning application at the site.

10. Background Papers

28.14 Minutes of Planning Communities EAP 27th March 2023:

<https://northnorthants.moderngov.co.uk/documents/s18596/2.%20PCEAP%20-%20Minutes%20-%2027%20March%202023%20-%20Draft.pdf>