

Addendum to Agenda Items Tuesday 28th July 2015

7. OTHER REPORTS

7a

**Variation of s106 agreement dated 13th March 2015 pursuant to planning application N/2014/0155 (Development of 45 apartments)
Land at Old Towcester Road**

No update.

7b

**N/2013/1035 and N/2013/1063 – Amendments to the reasons for refusal for outline and full planning applications – Northampton South (Collingtree) SUE
Land south of Rowtree Road and west of Windingbrook Lane**

No update.

10. ITEMS FOR DETERMINATION

10a

N/2014/1291

**Erection of 35 dwellings comprising 10 one bedroom flats, 15 two bedroom houses; and 10 three bedroom houses with associated access roads
Land between Booth Rise and Talavera Way**

Three objections have been received from occupiers of Booth Rise. Comments can be summarised as:

- The site is unsuitable for residential developments and would be affected by noise and pollution.
- The proposed development would result in a loss of trees.
- Booth Rise features narrow footpaths that are widely used.
- Booth Rise also features a significant amount of speeding traffic and is heavily used.

Officers Response:

Previous consideration of this proposal established that the principle of the developing this site for 35 dwellings was acceptable. In addition, this process established that 35 dwellings would not have an undue detrimental impact upon the surrounding highway system. In addition, the legal agreement would secure highways mitigation in the form of physical works and bus shelters. The applicant has submitted revised air quality and noise assessments, which conclude that the residents of the development would not be adversely affected by noise or poor air quality.

10b

N/2015/0335

Redevelopment comprising a new distribution centre (Use Class B8) including related service roads, access and servicing arrangements, car parking, landscaping bund and associated works

Land at Milton Ham, Towcester Road

Amendment to Committee Report:

Section 2 of the Committee Report erroneously states that there would be 66 parking spaces for heavy goods vehicles and that the footprint of the building is 46,651m². Members should be aware that the application includes 86 HGV parking spaces and the footprint of the building is 47,709m² (comprising the warehouse, the office building and the 'goods in' building, but excluding matters such as canopies and other ancillary structures).

A letter has been received from **David Mackintosh (MP for Northampton South)** expressing support for the development due to the combined developments proposed by the applicant representing over £100m worth of investment in the town and providing over 1,000 new jobs.

The Milton Ham site is an ideal location for a logistics centre and benefits from a long term allocation for such uses. A number of amendments have been made to the scheme to address many of the concerns raised by local residents.

A further **11 letters of objection** have been received. Comments can be summarised as:

- A mixed use development would be more appropriate for this location.
- This site should not be developed for a warehouse of the proposed scale.
- The design is inappropriate.
- The development would have an adverse impact upon neighbour amenity and the adjacent open space.

Comments from the West Hunsbury Residents Association have been submitted in respect of the Committee Report. These comments and responses are included within **Appendix 1** of this addendum.

Correspondence from the applicant has been received, which comments upon the amount of weight that can be attached to Policy E6 of the Northampton Local Plan as it has been replaced by the JCS.

Officers Response:

Policy E6 of the Local Plan allocated part of the site as green space. However, this policy has been replaced by the Joint Core Strategy and specifically Policy BN1. For the reasons set out in paragraph 7.4 of the Committee Report, it is considered that as Policy BN1 carries substantially more weight, the development is acceptable.

Additional Condition (27):

(27) Notwithstanding the details submitted, full details of the proposed boundary treatment (including heights) shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details, be fully implemented prior to the first occupation of the development hereby permitted and retained thereafter.

Reason: In the interests of creating a secure form of development in accordance with the requirements with the National Planning Policy Framework.

10c

N/2015/0419

Demolition of Bective Works and Jebez House and erection of student accommodation comprising 293 study bedrooms and including retail unit accessed from Yelvertoft Road Bective Works / Jebez House, Bective Road / Yelvertoft Road

Correspondence has been received from the applicant (which has been circulated to members and made available on the Council's website), which comments on the Inspector's findings at the recent appeal and details how these matters have been overcome through the current proposal.

10d

N/2015/0438

**Phased demolition of existing buildings and redevelopment to provide new headquarters and other offices (including related storage) within Class B1, shop (Class A1), gym (Class D2), with related access, parking, servicing and landscaping
Lodge Way House, Mandal House and Harveys Site, Lodge Way**

Members should be aware that a small section of the Harveys site is owned by Northampton Borough Council. This does not affect the merits of the proposal as any planning permission runs with the land and each application should be assessed on its own merits; however, the land ownership position should be noted.

A letter has been received from **David Mackintosh MP** expressing support for the development due to the combined developments proposed by the applicant representing over £100m worth of investment in the town and providing over 1,000 new jobs.

Correspondence has been received from the applicant confirming that the number of existing employees quote in the application package is 985, which was forecast to rise to 1,200 when the new HQ offices open and 2,000 within five years. This means that the scheme would generate 1,015 jobs in total; of which 215 would be upon opening of the new HQ offices. The applicant has also confirmed that the plant and equipment will be surrounded by a louvred enclosure.

Officers Response:

The confirmation relating to job numbers should be noted. Whilst the louvred enclosure would provide some mitigation, Condition 11 is still required in order to provide certainty.

Revision to Condition 8:

No development on each phase shall take place until a detailed scheme for the maintenance and upkeep of every element of the surface water drainage system proposed on the site has been submitted to and approved in writing by the Local Planning Authority and the maintenance plan shall be carried out in full thereafter. This scheme shall include details of any drainage elements that will require replacement within the lifetime of the proposed development

Reason: To prevent the increased risk of flooding, both on and off site, by ensuring the satisfactory means of surface water attenuation and discharge from the site in accordance with the National Planning Policy Framework. This condition is required in order to ensure the mitigation of flood risk in a timely manner.

10e

N/2015/0478

**Change of use from dwelling (use class C3) into a house in multiple occupation (HIMO) for 4 residents (use class C4) - retrospective application
66 Military Road**

No update.

10f

N/2015/0505

**Change of use from a dwelling (use class C3) to a house in multiple occupation (HIMO) for up to 4 residents (use class C4) – retrospective application
68 Military Road**

No update.

10g

N/2015/0554

Change of use from existing dwelling (use class C3) to a house in multiple occupation (HIMO) for 4 residents (use class C4)

83 Overstone Road

No update.

10h**N/2015/0561****Change of use from single dwelling (use class C3) to house in multiple occupation (HIMO) for 5 residents (use class C4) - retrospective application****76 Somerset Street****Amendment to Committee Report:**

There is one other HIMO within the 50m radius, that at 75 Somerset Street, which is subject to the application considered under Item 10j.

10i**N/2015/0625****Change of use from dwelling (use class C3) into house in multiple occupation (HIMO) for 5 residents (use class C4) – retrospective application****29 Poole Street**

No update.

10j**N/2015/0630****Change of use from dwelling (use class C3) into a house in multiple occupation (HIMO) for 3 residents (use class C4) – retrospective application****75 Somerset Street****Amendment to Committee Report:**

There is one other HIMO within the 50m radius, that at 76 Somerset Street, which is subject to the application considered under Item 10h.

12. ITEMS FOR CONSULTATION**12a****N/2015/0730****Variation of planning conditions for the Rusden Lakes Development (East Northamptonshire Council Consultation)**

No update.

Appendix 1 – Comments received in respect of N/2015/0335

Response to Planning Officers Report N/2015/0335 Milton Ham West Hunsbury

The West Hunsbury Residents Association believes that the officer's report in respect of the above application is not fit for purpose as it fails the test of being comprehensive, accurate and balanced.

Below are examples where councillors are not being presented with correct or appropriate information to enable them to make a sound decision.

<p>TITLE</p>	<p>DEPARTURE Yes</p> <p>We understand that this signifies that the recommendation is a departure from the policy framework.</p> <p>The report fails to identify the policy that is being disregarded, nor does it provide clear and specific reasons to deviate from the planning policy framework.</p> <p>Officer's Response:</p> <p>The purpose is to identify that the development is a departure from the designation of the Local Plan. The specific policy requirements are discussed within the body of the report.</p>
<p>Section 2 The Proposal</p>	<p>At a basic level the report fails to accurately report on factual aspects of the proposal.</p> <ul style="list-style-type: none"> • Para 2.1 states <i>“The building would have a footprint of approximately 46,651sqm with a maximum height of 18.3m.</i> The footprint is actually 49,270sqm or 47,411 excluding offices which are attached. The maximum height is 19.1m • Para 2.2 states <i>“the scheme includes the provision of 66 parking spaces for use by large heavy goods vehicles”</i> the number is 20 to the west and 66 to the east, a total of 86. <p>Inaccuracies of this sort do not give confidence to the reader of the quality of the rest of the report.</p> <p>Officer's Response:</p> <p>The total number of HGV parking spaces should be 86, there is a topographical error as the number and location of spaces are clearly shown on the submitted plans. The height of the building stated within the report accords with the details contained on the submitted elevation drawings.</p> <p>It is accepted that there is a comparatively slight understatement regarding the footprint of the proposed building as the combined footprint of the warehouse, the office building to the front of the site and the 'goods in' office to the rear of the site is approximately 47,709 square metres (as opposed to 46,641 square metres) . This will be corrected on the addendum. Items such as canopies and other ancillary structures such as smoking shelters are not included within this figure as these are of a comparatively small scale, have a limited footprint and are intended to aid the operation of the development.</p>
<p>Section 3 Site Description</p>	<p>The site description should provide councillors with a “descriptive visual context” of the proposed development site. The description provided in the report is inaccurate and biased.</p>

	<ul style="list-style-type: none"> • This section makes no reference to the land being a buffer between the residential community of West Hunsbury built in the 1980's consisting of some 2,000 houses. • Para 3.3. implies sparsely scattered houses using the words “beyond these are a number of residential dwellings”. • Para 3.4 states “does not feature any significant variations in topography, it is notable that the general site level slopes downwards”. In fact the site has a change in level of 7 metres which is a material consideration when the proposed development is a building with a single floor level. <p>Officer's Response:</p> <p>This section clearly identifies that there is residential accommodation within the surrounding area, which is graphically illustrated by the site location plan, which is included within the report.</p> <p>The report is also clear that the site does slope downwards in an easterly direction. A committee site visit has also taken place.</p>
<p>Section 4 Planning History</p>	<p>Para 4.3 does not provide an accurate description of the Inspector's main conclusions.</p> <p>The inspector basically concluded that a building on this site should not require bunding to hide it from local residents. The inspector went on to say that development should blend into the natural landscape.</p> <p>Councillors have not been provided with an accurate account of the inspector's report</p> <p>Officer's Response:</p> <p>In dismissing the appeal, the Inspector concluded that the only means of overcoming the proposed buildings' poor design would be through extensive landscaping work, which would result in harm to the landscape. As a consequence, it is considered that the report accurately summarises the Inspector's findings.</p>
<p>Section 5 National Policies</p>	<p>The report cannot list all the national planning policies that could apply to the application under consideration but nor should the report selectively bring to the attention of the councillors the policies that support the recommendation and omit policies which are also material considerations.</p> <ul style="list-style-type: none"> • Para 5.2 states “however, the following sections are of particular relevance to this application” • Parar 5.3, 5.4 and 5.5 goes on to detail the policy objectives relating to economic development and jobs. • Para 5.6 “places great weight upon the importance of design” and Para 5.7 states “new developments should not contribute towards or create an unacceptable impact upon noise and air pollution” • In just 6 paragraphs the report sets the apparent relevant national policies giving a very one sided perspective to councillors. • The report fails to bring to the attention of councillors (many of whom are new to planning) key national policies which are detailed in the JCS when considering NPPF. • Why does the report not bring to the councillors attention NPPF policies such as Para 61 which states. “Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment”

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	<ul style="list-style-type: none">• Or JCS Para 8.15 which points out that “National policy strongly supports the movement of freight by rail which enables the modal shift away from road based transport”• We use these examples to demonstrate that councillors are being supplied with a one sided view of national policies which happen to support the officers recommendation. <p>Officer’s Response:</p> <p>The report is clear that the National Planning Policy Framework is to be read as one complete document, rather than a series of unconnected policies; however, key parts of highlighted for ease of reference. It is correct in stating that paragraph 61 is not referenced; however, this paragraph expands upon the points raised within paragraph 57 (which is discussed in the report), which identifies the need for high quality and inclusive developments.</p> <p>References to rail travel are not of significant relevance in this particular instance as the site is, in part, allocated for commercial uses including warehousing and is not served by a railway line. As a consequence, the key matter for consideration is whether the development would have an adverse impact upon the movement of traffic in the area, highway safety and air quality. All of these matters are assessed in the report.</p>
<p>Section 5 West Northamptonshire Joint Core Strategy (2014)</p>	<p>The JCS developed over the last 8 years and approved in December 2014 provides the most relevant set of planning policies that should be brought to the attention of councillors.</p> <p>The policies detailed in just 4 paragraphs appear to have been selected to support the officer’s recommendation. Policies S7, S10 and BN1 are highlighted but the policies that relating to future development of Warehousing and Distribution have been ignored.</p> <ul style="list-style-type: none">• Why does the report not bring to the councillors attention Policy E8 relating to the Strategic Employment site at Junction 16?• Why does the report not advise the councillors that the JCS states in para 8.44 that “The scale and extent of B8 (Storage or Distribution) uses will be carefully controlled.”• Or bring to the attention of councillors that in para 8.41 “The West Northamptonshire Employment Land Study (2012 Review) demonstrates the substantial floor space available within the plan area over the plan period to support the economic objectives of the JCS.” <p>There are many more JCS policies that residents believe should be brought to the councillor’s attention. Currently the report focuses on policies to support the recommendation and ignores any policy which might cause the planning committee to ask awkward but relevant policy questions.</p> <p>Officer’s Response:</p> <p>In assessing planning applications, it is necessary to reach a decision on whether the proposed development is acceptable within the selected location. If deemed acceptable, the fact that there may be an alternative location cannot be used as a reason for refusal. As a consequence of this, the presence of Policy E8 in the JCS (which allocates land adjacent to J16 of the M1) is not material to the application. It therefore follows that the cited JCS paragraphs – which form the preamble to Policy E8 are of limited weight.</p>

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<p>Section 5 Northampton Local Plan 1997 (saved or retained Policies)</p>	<p>Policy B11 is referred to in para 5.14.</p> <p>This policy has not been complied with comments on para 7.13 below refer.</p> <p>Officer's Reponse:</p> <p>See comments on Paragraph 7.13</p>	
<p>Section 6 Consultations and Representations</p>	<p>At first glance this appears to be the sort of summary that you would expect to be presented to councillors. The councillors rely on an accurate representation of the representations received but this has not been provided and therefore the councillors are being misled.</p> <p>The representation from the Parish council is acknowledged but appears to have been carefully edited. The main thrust of the Parish Council objections were provided in the first 5 reasons relating to planning policy in the JCS. As these policies were also omitted from Section 5 when setting out the JCS policy framework this appears to ignore these policies and representation that was made in response to this application.</p> <p>Planning Dept reports on previous applications have acknowledged and referred fully to submissions made by the West Hunsbury Residents Association. The WHRA made two detailed submissions of 28 and 7 pages respectively and neither is acknowledged in the report.</p> <p>The WHRA representations might have been included in the 218 letters of objection though this would be to underplay the extensive effort of presenting detailed planning consideration. Among other material considerations the WHRA submission provided objections regarding retained policies and the JCS which constitutes the current planning policy. None of the listed comments summarising the 218 letters makes reference to these policies and therefore the report is clearly incomplete and misleads the councillors.</p> <p>This appears to be another apparent misrepresentation of key material considerations that have been presented but are inconvenient to the narrative of the report which is to provide information that justifies the application. Information has clearly been omitted that runs counter to this narrative.</p> <p>Officer's Response:</p> <p>The purpose of this section is to provide a succinct summary of the key points that have been raised form all consultees, including the Parish Council.</p> <p>Representations have been submitted from a group of residents of Heronsford and Teal Close; however, these do not appear to have been submitted in the name of a Residents Association. As a consequence, this section of the report is accurate.</p>	
<p>Section 7 Appraisal</p>	<p>Para 7.1</p>	<p>Misleading final sentence <i>“By reason of the initial allocation, the principle of developing this section of the site for a warehouse is considered acceptable in principle”</i>.</p> <p>Councillors reading this could be forgiven to think that this refers to the open space area when in fact this statement should only apply to the larger designated development area.</p>

		<p>Officer's Response:</p> <p>Paragraph 7.1 is clear in that the site comprises two sections. It also specifies that the section under consideration is the allocated section. It should be read in conjunction with paragraphs 7.2, 7.3 and 7.4 which discuss the impacts on green space.</p>
	<p>Para 7.2</p>	<p>Misleading guidance to councillors in the final sentence <i>“it should be recognised that the application site is already separated from the nearest villages by the M1 Motorway to the south and the old Towcester Road”</i>. On first reading this, it appears to be clear advice but is completely inaccurate and misleading.</p> <p>The physical characteristics surrounding the development site and the open space has not changed since 1997. The E6 Green Space Policy in the 1997 plan was there <i>to “resist outward expansion of the built up area.”</i> The report is misleading councillors suggesting that something has changed when in reality nothing has changed. Building on the open / green space is in direct contravention to the 1997 E6 policy intention.</p> <p>Officer's Response:</p> <p>The report clearly states the requirements of the policy; however, it is a matter for the appraisal to establish the amount of weight that the policy carries.</p>
	<p>Para 7.3</p>	<p>The report dismisses references to other sites when it is convenient to do so and then employs this tactic to mislead councillors. As detailed above (7.2) policy E6 was drafted and approved in 1997 and nothing has changed. Therefore it is completely misleading to suggest that developments in Swan Valley or in Collingtree devalue the purpose and effectiveness of the green space.</p> <p>The report says <i>“it is considered that the overall effectiveness of the open space in maintaining the setting of the surrounding villages is somewhat debatable”</i>. Why does the report focus on villages that are not relevant and fails to acknowledge the development on the open space would be an outward expansion of the built up area as stated in the policy?</p> <p>Officer's Response:</p> <p>The purpose of this policy was to maintain the character of existing villages and to resist the outward expansion of the built up area. The purpose of the references to work carried out in Swan Valley and Pineham, in addition to new allocations in the JCS is to highlight that the character of the site's environs has changed since 1997.</p> <p>Policy BN1 is of greater relevance as, it has replaced Local Plan Policy E6 and therefore represents a more up to date policy. The majority of the allocated space would remain undeveloped as it would feature landscaping and a drainage lagoon. In addition, the quality of planting be improved and would include a number of native species and there would be some ecological benefits of the proposal. As a management regime can be secured, it is considered that the development accords with Policy BN1.</p>
	<p>Para 7.4</p>	<p>If the policy departure is in relation to E6 Green Space then the report should set out the justification.</p> <p>Reference to Policy BN1 has no relevance in justifying over-riding the existing Green Space policy allocation.</p>

		<p>Officer's Response:</p> <p>Policy BN1 is of relevance as it is a material consideration and forms part of the adopted policy plan. Moreover, it has replaced Local Plan Policy E6 and therefore represents a more up to date policy and therefore carries weight in the decision making process.</p>
	<p>Para 7.5</p>	<p>Jobs and employment are material consideration but only on the site in question. Why does the report refer to <i>“The employment opportunities will be in addition to the existing commercial units within the Borough that operated by the applicant”</i>? This is not relevant and implies that the applicant has suggested to the planning department they would move operations out of Northampton if this application is not recommended for approval. The report makes no comment as to whether 300 jobs or more jobs could be provided within the approved development site. The report presents the picture that the only way to secure 300 jobs is to develop on the previously protected open space. These considerations should have been explicitly presented to councillors for consideration not presented as a fait accompli.</p> <p>Officer's Response:</p> <p>The purpose of this reference is to highlight the fact that the development would provide new jobs as opposed to re-site existing employees from other locations and is therefore material to the decision.</p>
	<p>Para 7.6</p>	<p>The report states <i>“it is likely that general industrial uses would have a greater impact upon neighbour amenity in terms of considerations such as noise and air quality”</i>. Is this suggesting that proposing B8 (operating on a 24/7 basis generating over 420 HGV movements per day) is intended to protect local residents? A mixed use application with adequate protection for local residents has been previously approved on this site with the full support of residents. The report makes an unsubstantiated statement misleading councillors.</p> <p>Officer's Response:</p> <p>The allocation within the Local Plan suggests that a number of uses within the site would be acceptable. This would include more intensive industrial uses (such as more noisy or polluting uses). The reference is therefore necessary to establish that other policy compliant uses may have a greater impact on residential amenity.</p>
	<p>Para 7.8</p>	<p>This paragraph sets out to dismiss the planning guidance provided within the JCS regarding carefully considering the scale and extent of B8 usage. To give the impression to councillors that there is no choice but to approve. The report states that the development is too big for the new site at Junction 16 and fails to point out to councillors that this development of 49,270 sq. metres can only be accommodated at Milton Ham by developing beyond the approved development site encroaching on to Green space.</p> <p>Officer's Response:</p> <p>Paragraph 7.8 concludes that there are no available sites of the right size within Swan Valley and Pineham. It is not intended for the</p>

		Junction 16 site to be developed in a piecemeal fashion, which rules out the proposed development. The encroachment on allocated green space and the relative merits is discussed elsewhere within the report.
Section 7 Design and appearance	Para 7.13	<p>The report states “Policy B11 states that no building with a height in excess of 9m should be constructed within 50m of the northern boundary” also “this objective has been complied with”. The warehouse would be less than 50m from the northern boundary at its nearest point and is approx. 17m high at that point (allowing for roof slope) with a base 4m above ground level. The total height is therefore 21m. We feel that the intention of Policy B11 is to set perspective and prevent inappropriate massing viewed from adjoining residential and parkland areas. Councillors should be presented with an explicit view of the massing at this boundary and the report fails to do this.</p> <p>Officer’s Response:</p> <p>This policy only relates to the area allocated within the Local Plan for commercial uses. At the closest point within the allocated area, the proposed building is more than 50m away from the site boundary. As a consequence, the report is correct in concluding that this specific policy has not been breached. The report does consider the impacts of the proposed building on the wider area and residential amenity in full.</p>
	Para 7.14	<p>Quotes a maximum height of 18.3m rather than 19.1m and states “Whilst the proportions of this building are far larger than those of the residential accommodation within the vicinity of the site, it is considered the development would not harm the visual amenity of these residents” the reason given is that “elevations utilised a pitched roof design, which reduces the massing of the building”</p> <p>The pitch is approximately 2m but as stated earlier the base is generally above ground level by up to 4m on the north elevation and the report fails to make this clear to councillors. Para 7.17 states “the 2008 proposal included a hotel with a height of 30m albeit with a smaller footprint than the building proposed” The hotel was to be over 300 metres from the nearest dwelling and, whilst it may have been higher than the proposed warehouse, being much further away meant it would have had minimal visual impact.</p> <p>Officer’s Response:</p> <p>The report highlights that there is a variation in land levels and a condition is recommended that would require full details of the proposed finished levels to be submitted to the Council prior to building work commencing. The report also refers to the previously permitted hotel to demonstrate development with a tall height has been approved in the past; however, it is clear that the two schemes are not directly comparable.</p>
	Para 7.18	<p>Refers to the north bund “being designed in an asymmetric fashion. This ensures that these works appear more natural” A bund is necessarily an artificial landform and will never appear as part of the natural landscape of the area. The Inspector made this point very clearly in his report.</p> <p>This bund neither hides the building nor does can it appear in any way part of the natural landscape, particularly on the east side, within the greenspace area where the bund would have a 1 in 3 slope and is over 12 metres high.</p>

	<p>Officer's Response:</p> <p>The asymmetric design means that a less steep gradient can be accommodated on the northern side of the bunding. This means that the impact upon the</p>
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<p>Section 7 Air Quality</p>	<p>The two paragraphs in this section make reference to the "Air Quality Management Area" which is an NBC responsibility and makes no reference to the implications to local residents as a result of increased levels of nitrogen dioxide and particulates.</p> <p>In considering a commercial operation adjacent to an established residential area and local playing fields, the report should advise councillors about the impact even if the conclusion is, there will be no impact.</p> <p>This omission is particularly concerning.</p> <p>Officer's Response:</p> <p>In assessing these matters, advice is taken from the Council's Environmental Health offices which is clearly summarised in the report. In addition, the report highlights the relevant issues and sets out the recommended conditions to mitigate this matter.</p>
<p>Section 7 Noise</p>	<p>The report does not make clear that no readings have been taken of the current noise levels experienced by local residents. Therefore, in the absence of empirical values, councillors cannot be confident that the proposed conditions will achieve their intended outcome.</p> <p>The report fails to provide councillors with evidence that the crematorium will not be adversely impacted by additional disruptive noise.</p> <p>Officer's Response:</p> <p>In assessing these matters, advice is taken from the Council's Environmental Health offices which is clearly summarised in the report. In addition, the report highlights the relevant issues and sets out the recommended conditions to mitigate this matter.</p>
<p>Section 7 Flood Risk</p>	<p>The policy section of this report fails to mention that Northampton has its own SUDS standard reflecting that the Borough Council and the Councillors have a duty of care to local residents following the 1998 floods across Northampton.</p> <p>That policy defines acceptable methods for flood mitigation and any deviation from this represents a departure from policy. The developer has proposed underground tanks to retain flood water although these are not approved within the local policy.</p> <p>It is our view that the report should have made this clear to councillors to enable them to make an informed decision.</p> <p>Officer's Response:</p> <p>The application has been assessed by the Lead Local Flood Authority (NCC) and the Environment Agency. Neither organisation has raised objections to the proposal, subject to the imposition of conditions relating to drainage matters.</p>

	<p>As a consequence, it is considered that the report accurately summarises the issues, the advice received by the Council and the steps taken to address it.</p>
Section 8 Conclusion	<p>The conclusion fails to summarise the justification for departure from the planned policy framework</p> <p>Officer's Response:</p> <p>The conclusion comments upon the amenity value of the open space and comments upon how its loss is outweighed by the benefits of the scheme.</p>