



West Northamptonshire Joint Strategic Planning Committee

Your attendance is requested at a meeting to be held at the Council Chamber, County Hall, Northampton on Monday, 26 July 2010 at 6:00 pm.

D. Kennedy
Chief Executive

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Agenda

1. APOLOGIES FOR ABSENCE
2. MINUTES
3. DECLARATIONS OF INTEREST
 - Personal
 - Prejudicial
4. MATTERS OF URGENCY

To consider any issues that the Chairman is of the opinion are Matters of Urgency.
5. PUBLIC PARTICIPATION (IF ANY)
6. EMERGENT JOINT CORE STRATEGY- CONSULTATION RESPONSES SUMMARY
(copy herewith)
7. THE CHAIRMAN TO MOVE:

“THAT THE PUBLIC BE EXCLUDED FROM THE REMAINDER OF THE MEETING ON THE GROUNDS THAT THERE IS LIKELY TO BE DISCLOSURE TO THEM OF SUCH CATEGORIES OF EXEMPT INFORMATION AS DEFINED BY SECTION 100(1) OF THE LOCAL GOVERNMENT ACT 1972 AS ARE LISTED AGAINST SUCH ITEM OR ITEMS OF BUSINESS BY REFERENCE TO THE APPROPRIATE PARAGRAPH OF SCHEDULE 12A TO SUCH ACT.”

Agenda Item 2

WEST NORTHAMPTONSHIRE JOINT STRATEGIC PLANNING COMMITTEE

Monday, 7 June 2010 At Towcester

PRESENT: Councillor Chris Millar (Chair); Councillors Wendy Amos, Jim Bass, Robin Brown, Richard Church, Stephen Clarke, David Dickinson, Deanna Eddon, Andrew Grant, Brian Markham, Chris Over and John Townsend

1. APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Mary Clarke, Joy Capstick, Andre Gonzalez de Savage, Brian Hoare, and Colin Poole.

6. APPOINTMENT OF CHAIR AND VICE- CHAIR

Councillor Richard Church proposed and Councillor John Townsend seconded "That Councillor Chris Millar be appointed Chair of the West Northamptonshire Joint Strategic Planning Committee for the ensuing year."

Upon a vote the motion was carried.

(Note: Councillor Tony Woods was in the Chair until this point in the meeting.)

On behalf of the Joint Committee, the Chair thanked Councillor Tony Woods for his chairmanship of the Joint Planning Committee.

Councillor John Townsend proposed and Councillor Wendy Amos seconded "That Councillor Mary Clarke be appointed Vice Chair of the West Northamptonshire Joint Strategic Planning Committee for the ensuing year."

Upon a vote the motion was carried.

2. MINUTES

The minutes of the meeting of the Joint Committee held on 30 March 2010 were signed by the Chair as a true record.

3. DECLARATIONS OF INTEREST

Councillor Chris Millar declared a personal interest in item 8 "Northamptonshire Minerals and Waste Framework: Update on Progress" as the Chair of the Northamptonshire Waste Partnership.

David Dickinson declared a personal interest in item 8 "Northamptonshire Minerals and Waste Framework: Update on Progress" as a member of the WNDC's Northampton Planning Committee in so far as the discussion referred to Billing Sewerage Works.

4. MATTERS OF URGENCY

None.

5. PUBLIC PARTICIPATION (IF ANY)

Mr Peter Hawkins, as Chairman of the Great Houghton Action Group, presented a petition on behalf of approximately 600 residents from around Northampton seeking the Joint Committee's abandonment of its strategy based on '*Sustainable Urban Extensions*' and to establish a policy to take account of the new Government's "Programme for Government".

Mr Hawkins stated that the Government's programme committed it to "rapidly abolish Regional Spatial Strategies and return decision-making powers on housing and planning to local councils". He believed that much of the associated reform agenda was directly relevant to the Joint Core Strategy, including proposals to engage neighbourhoods directly in 'Open Source Planning', better protect green areas, promote sustainable development and travel, and improve flood defences.

Mr Hawkins believed that the scrapping of the regional housing targets was timely for Northampton. Over time, a 'high growth' target of 40,000 new homes in the Regional Plan had grown into a strategy for 58,000 homes by last summer. He stated that Planners could now carefully consider more modest growth projections already in the pipeline, linked with other new Government policies. Available evidence suggested to the petitioners that, once this analysis was updated, Northampton's true housing need was likely to fall well within previously identified capacity.

In this context, Mr Hawkins stated that the massive green-field sites proposed in the Joint Core Strategy would be unnecessary. Furthermore, given recent warnings about public finances, a strategy which depended on extensive but unaffordable pre-requisite infrastructure seemed foolhardy.

Mr Hawkins believed that the risk was that officers in individual councils would fail to appreciate the implications of these policy changes. For example, the County Council's 'Northamptonshire Arc' report, which was also to be considered at the meeting, appeared founded in the now outdated approach; repeating the housing targets from the Emergent Joint Core Strategy. He commented that the electorate would be looking to the Joint Committee members to ensure that officers both understood the new policy and would execute it effectively.

The petitioners looked forward to the re-democratisation of the planning process in this area, and hoped and expected that councillors from all four councils would drive this agenda forward. They sought a focus on more realistic and sustainable housing growth, employing empty dwellings, existing land banks and brown-field opportunities wherever possible and the abandonment of plans for '*Sustainable Urban Extensions*' around Northampton.

The Chair commented that a response to the petition would be given at the next meeting of the Joint Committee on 26 July 2010.

7. THE NORTHAMPTONSHIRE ARC

The Head of the JPU submitted a report that referred to Northamptonshire County Council's consultation upon the concept of the "Northamptonshire Arc" and elaborated thereon. He referred to the recommendations and in particular the need to establish the relationship between the Joint Core Strategy, which was a statutory document, and Arc which would be non statutory.

The Chair observed that the Northamptonshire Arc to promote Northamptonshire to attract investment and jobs should be welcomed but that it should not duplicate or confuse the Joint Core Strategy.

It was noted that the Arc appeared to resurrect a concept of creating an urban spine through the County and ignoring Northampton as an economic driver. This concept had been heavily criticised at the time. The Arc could only be a second to whatever the statutory planning policy base was, currently, the Joint Core Strategy. The County Council's concept should not be confused with the MKSM Northampton Arc which was about transport links, the A43 and A45 in particular; they were different documents with different status.

Councillor Jim Bass commented that he would support the idea that the North Northamptonshire and West Northamptonshire arrangements should be unified and noted that a review of the Joint Core Strategy in North Northamptonshire was due to commence shortly.

In general discussion the concept of the Northamptonshire Arc as a means of promoting the County for investment and jobs was supported. There seemed to be gaps in it in respect of rural communities and facilities for young people. The Arc also needed to consider circumstances beyond the County's boundary. The County Council needed to recognise the non- statutory status of their concept. The situation in respect of the Daventry Appeals proved the need for, and the vulnerability of not having, a planning strategy in place.

Councillor Brown observed that in future planning would reside with local councils and with its local development frameworks. He believed that the Arc did cover rural communities and infrastructure including Silverstone. The County Council would have to work with all of its neighbours.

The Chair commented that there was an existing infrastructure deficit in West Northamptonshire; the need for infrastructure led development was still relevant although the economic situation complicated this. It would be important to attract inward investment and jobs to address some of this. The Northamptonshire Arc would be a good promotional tool for the County Council and NEL. He hoped that the Secretary of State would clarify the situation in the near future. None of this took away the need for a plan to be in place to avoid the risk of developer led development.

- RESOLVED:**
1. That the principle of the non- statutory Arc as a way of raising the profile of Northamptonshire, particularly in terms of developing a mechanism for increasing the potential for future investment be supported.
 2. That the County Council be requested to reconsider the intention of the Arc to be a unifying alternative to the two Joint Core Strategies in Northamptonshire.
 3. That the Arc, as a non- statutory document, should support the West Northamptonshire Joint Core Strategy together with the other planning policy documents forming part of the statutory Local Development Framework as set out in the approved West Northamptonshire Local Development Scheme (February 2010).

8. NORTHAMPTONSHIRE MINERALS AND WASTE FRAMEWORK: UPDATE ON PROGRESS

The County Council's Corporate Director of Environment, Growth and Commissioning submitted a report that set out progress towards the adoption of a Minerals and Waste Joint Core Strategy for Northamptonshire, two supporting site specific DPDs, and consultation on the Control and Management of Development DPD.

Whilst accepting that the proposals for Daventry were intended to deal with the District's own waste, Councillor Chris Over expressed concern in respect of the location of the proposal at Drayton Fields/ Royal Oak as being a gateway to the Town. He suggested that it would be better located in an industrial area.

Councillor Jim Bass expressed concern in respect of the situation at Billing Sewerage Works. It was agreed that this needed to be resolved.

- RESOLVED:**
1. That the Adoption of the Minerals and Waste Core Strategy be noted.
 2. That the examination of the locations for Minerals and Waste Development DPDs, including allocations across West Northamptonshire with public hearings to take place during October 2010 be noted.
 3. That the opportunity for the public and organisations to make representations on the proposed Control and Management of Development DPD until 22 July 2010 be noted.
 4. That the Joint Committee receive a further report on any representations made on the proposed Control and

Management of Development DPD.

The meeting concluded at 18.52 hours.

Item No:
Date: 26 July 2010

**WEST NORTHAMPTONSHIRE
JOINT STRATEGIC PLANNING COMMITTEE**

West Northamptonshire Emergent Joint Core Strategy Consultation Responses
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REPORT OF THE HEAD OF THE JOINT PLANNING UNIT

1. Purpose

- 1.1 The purpose of this report is for the West Northamptonshire Joint Strategic Planning Committee to formally receive and to note the contents of the summaries of the responses that were received to the West Northamptonshire Emergent Joint Core Strategy consultation held in 2009. This is a necessary procedural step in the preparation of the West Northamptonshire Joint Core Strategy.

2. Recommendations

- 2.1 That the West Northamptonshire Joint Strategic Planning Committee:
- 1) Formally receives and notes the contents of the summaries of the responses that were received to the West Northamptonshire Emergent Joint Core Strategy consultation held in 2009.

3. Introduction to the Emergent Joint Core Strategy

- 3.1 The approved West Northamptonshire Local Development Scheme (February 2010) sets out the content and timetable of the Local Development Framework for West Northamptonshire. The Joint Core Strategy is the priority document for preparation. It is the overarching document and all subsequent documents must reflect what it says.
- 3.2 The Joint Core Strategy will be the long term strategic plan for the development of West Northamptonshire – it deals with the big picture of what will happen in the future. It is a spatial policy document, which means it deals with places and the activities that happen within and between them.

- 3.3 Preparation of the Joint Core Strategy is a legal requirement and the partner authorities of Daventry District, Northampton Borough, South Northamptonshire and Northamptonshire County Councils are producing a Joint Core Strategy for their collective areas; an area referred to as West Northamptonshire. The partner authorities are working in close co-operation with West Northamptonshire Development Corporation to produce the Joint Core Strategy and ensure the delivery of development and infrastructure.
- 3.4 At its meeting on 6 July 2009 the West Northamptonshire Joint Strategic Planning Committee approved the publication of the West Northamptonshire Emergent Joint Core Strategy for consultation. The Emergent Joint Core Strategy was published on 31 July 2009 for a six week consultation period which was subsequently extended by 2 and half weeks to 30 September 2009 due to printing problems with the accompanying consultation questionnaire.
- 3.5 The content of the Emergent Joint Core Strategy was informed by the Joint Core Strategy Issues and Options (September 2007) and Regulation 25 (January 2009) consultations, the collection of a wide ranging evidence base and on-going work with technical bodies such as the Environment Agency. The Emergent Joint Core Strategy marked a fundamental step towards the submission and adoption of the Joint Core Strategy. The Emergent Joint Core Strategy set out thinking at the time of its publication with respect to the policy approach that should be taken in West Northamptonshire and was based on the evidence collected to date. It was not a draft plan or final strategy; it did not set out policies but it did set out the policy approach and the preferred options and rejected options for the locations of growth at each town in West Northamptonshire. It was emphasised in the Emergent Joint Core Strategy that at that time some parts of the evidence base were clearer than others. Where further work was needed this was noted in the text of the document.
- 3.6 The Emergent Joint Core Strategy sought to explain the thinking of the Joint Strategic Planning Committee at the time of its publication and offered a chance to make comment. The Strategy was written for everyone with an interest in the future of the places that make up West Northamptonshire. It was noted in the Emergent Joint Core Strategy that it would have impacts on existing communities, businesses, landowners, developers and investors. It was also noted that it would increase the level of dialogue with bodies such as the Environment Agency, the Highways Agency and Natural England.
- 3.7 The Emergent Joint Core Strategy was subject to a sustainability appraisal and an appropriate assessment by independent environmental consultants Environ. Environ's reports were published alongside the Emergent Joint Core Strategy to allow respondents to the Emergent Joint Core Strategy to reflect on Environ's appraisal and assessment in preparing their responses.

4. The Emergent Joint Core Strategy Consultation

4.1 The Joint Strategic Planning Committee considered a report about the Emergent Joint Core Strategy consultation at its meeting on 30 March 2010 (Agenda Item 7). The Committee report set out a summary of the consultation that was undertaken for the Emergent Joint Core Strategy including:

- 1) full details of the community involvement and consultation methods used throughout the Emergent Joint Core Strategy consultation;
- 2) the number, geographical distribution and form of the responses; and
- 3) the proportion of the responses in support, not in support, unspecified and do not know.

Emergent Joint Core Strategy and Consultation Questionnaire

4.2 In terms of responding to the Emergent Joint Core Strategy respondents could use the following methods:

- 1) *Consultation Questionnaire* - A consultation questionnaire was published alongside the Emergent Joint Core Strategy. The questionnaire enabled respondents to answer each of the consultation questions set within the Emergent Joint Core Strategy with the answer "Yes", "No", or "Don't Know" and provide reasons for each response;
- 2) *Online Consultation Feedback System* - The Joint Planning Unit used the web-based Limehouse consultation system to enable individuals and organisations to view and download the Emergent Joint Core Strategy, the consultation questionnaire and the accompanying Sustainability Appraisal and Appropriate Assessment. Once registered on the Joint Planning Unit's consultation system respondents could also submit their responses electronically. The Partner Authorities' websites also provided links to the consultation system on their websites.
- 3) *Letter, Email or Fax*
- 4) *Recorded Phone Message*
- 5) *Public Exhibition Feedback Form*

5. The Emergent Joint Core Strategy Consultation Responses - Summaries

5.1 As a result of the Emergent Joint Core Strategy consultation 4,781 individuals and organisations submitted 6,355 responses containing a total of 120,668 individual comments, also known as representations. All the responses have been logged and an acknowledgement sent to each respondent.

5.2 All responses to the Emergent Joint Core Strategy are available to view on the Joint Planning Unit's website or by appointment at the Joint Planning Unit's office in Northampton.

5.3 The Joint Planning Unit has coded all the responses by the consultation questions set in the Emergent Joint Core Strategy and entered them into a database. The responses have then being summarised by consultation question. The summaries of all the responses by question and in question number order, i.e. starting with question 1 through to question 52, is attached to this report as Appendix 1. Introductory notes are included at the beginning of the Appendix along with a glossary and a contents page.

6. Next Stages

6.1 All respondents to the Emergent Joint Core Strategy will be notified of the publication of the responses, the timetable for the next stages and the nature of the next stages of the Joint Core Strategy preparation process.

6.2 The responses to the Emergent Joint Core Strategy will be taken into account in the preparation of the Pre-Submission Joint Core Strategy. At a future meeting the West Northamptonshire Joint Strategic Planning Committee will receive the officers' recommended response to the consultation responses to the Emergent Joint Core Strategy for the Committee's consideration.

6.3 The Head of the Joint Planning Unit has sought legal advice from Counsel that the approach to the reporting and consideration of the responses to the Emergent Joint Core Strategy, as set out above, is acceptable. Counsel has confirmed that this approach is acceptable.

West Northamptonshire Joint Strategic Planning Committee

26 July 2010

West Northamptonshire Emergent Joint Core Strategy Consultation
Responses

Appendix 1:
Summaries of the Responses by Consultation Question

Introductory Notes

These introductory notes should be read before reviewing the West Northamptonshire Emergent Joint Core Strategy Consultation Responses found in Appendix 1: *Summaries of the Responses by Consultation Question*.

A contents page has been produced for Appendix 1, which sets out the question number, the question title and the associated page numbers within the report.

The summary of responses to the West Northamptonshire Emergent Joint Core Strategy has been produced by question number. Each question is then separated into three separate sections: 1) Support, 2) Object, 3) Any other comments.

The consultation responses have been summarised by the West Northamptonshire Joint Planning Unit and therefore individual responses are not attributable.

The original individual consultation responses received to the West Northamptonshire Emergent Joint Core Strategy are all available to view online and can be found on the West Northamptonshire Joint Planning Unit Website at: <http://www.westnorthamptonshirejpu.org/Responses/Default.aspx>

Or by visiting the West Northamptonshire Joint Planning Unit office in Northampton. Please phone the Unit in advance to make an appointment. Tel. 01604 837838

A Glossary of Terms has also been produced which provides definitions and explanations of abbreviations used within Appendix 1: *Summaries of the Responses by Consultation Question*.

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4	Do you support Objective 3? 'To support existing and new communities through the provision of education, health, community, leisure, cultural and social facilities, linking new and existing communities physically and socially'	22-27
5	Do you support Objective 4? 'To direct retail development to the most appropriate locations that support regeneration of the town centres'.	28-33
6	Do you support Objective 5? 'To complete, enhance and safeguard the connections in the existing strategic green infrastructure network, extending these into new urban extensions and creating connections between neighbourhoods'.	34-37
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10	Do you support Objective 9? 'To contribute towards raising education achievement and the skills base of our communities through supporting schools, colleges and the University in their provision and development'.	49-54
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Glossary of Terms

Disclaimer

The Glossary is neither a statement of law nor an interpretation of the law, and its status is only an introductory guide to planning terminology and should not be used as a source for statutory definitions.

A1 Shops: (Town and Country Planning (Use Classes) Order 1987 (as amended) includes shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices (but not sorting offices), pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafés.

A2 Financial and professional services: (Town and Country Planning (Use Classes) Order 1987 (as amended) includes financial services such as banks and building societies, professional services (other than health and medical services) including estate and employment agencies and betting offices.

A3 Restaurants and cafés: (Town and Country Planning (Use Classes) Order 1987 (as amended) includes the sale of food and drink for consumption on the premises - restaurants, snack bars and cafés.

A4 Drinking establishments: (Town and Country Planning (Use Classes) Order 1987 (as amended) includes Public houses, wine bars or other drinking establishments (but not night clubs).

A5 Hot food takeaways: (Town and Country Planning (Use Classes) Order 1987 (as amended) includes the sale of hot food for consumption off the premises.

Accessibility: Refers to the extent to which employment, goods and services are made easily available to people, either through close proximity, or through providing the required physical links to enable people to go to locations where they are available.

Affordable housing: This includes housing which is provided to households whose needs are not met by the market at a cost which is below market price or rents.

B1 Employment Use: Offices, research and development, light industry (in the Town and Country Planning Use Classes Order 1987 and its subsequent amendments).

B2 Employment Use: General Industrial (in the Town and Country Planning Use Classes Order 1987 and its subsequent amendments).

B8 Employment Use: Storage and distribution (in the Town and Country Planning Use Classes Order 1987 and its subsequent amendments).

Biodiversity Action Plan (BAP): Each Local BAP works on the basis of partnership to identify local priorities and to determine the contribution they can make to the delivery of the national Species and Habitat Action Plan targets.

Biodiversity: The variety of plants, animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity.

Brownfield land: Land that has previously been used or developed

CABE: The Commission for Architecture and the Built Environment (CABE) is an executive non-departmental public body of the UK government, established in 1999. It is funded by both the Department for Culture, Media and Sport and the Department for Communities and Local Government. CABE is the government's advisor on architecture, urban design and public space in England. Its job is to influence and inspire those people making decisions about the built environment. It champions well-designed buildings, spaces and places, runs public campaigns and provides expert, practical advice. It works directly with architects, planners, designers and clients.

Carbon footprint: The amount of greenhouse gas produced in daily life through the burning fossil fuels.

Central Area Action Plan (CAAP): Northampton Borough Council is preparing a CAAP for Northampton to direct the redevelopment of the central area.

Circular 05/05 (Planning Obligations): The purpose of this Circular is to provide guidance on the use of planning obligations in England under Section 106 of the Town and Country Planning Act 1990 as substituted by the Planning and Compensation Act 1991.

Planning obligations (or 's106 agreements') are private agreements negotiated, usually in the context of planning applications, between local planning authorities and persons with an interest in a piece of land intended to make acceptable development which would otherwise be unacceptable in planning terms. Obligations can also be secured through unilateral undertakings by developers.

Commercial Property and Employment Land Study (CoPELA (2006): This study was commissioned by Invest Northamptonshire and Northamptonshire County Council as an update to the 2003 Commercial Property and Employment Land Study. Its purpose is to assess the planned and emerging supply of employment land in Northamptonshire against future market demand and policy requirements.

Compact City: A model for city development akin to traditional high-density European cities such as Paris and Barcelona. It offers a sustainable form of

development, enabling reduced travel demand through high-density mixed-used development.

Connectivity: The linkages that exist between key locations.

Contour: The gradient or steepness of a hillside.

Daventry International Rail Freight Terminal (DIRFT): Is an intermodal (changing from one mode of transport to another) rail port and logistics centre located near Crick, Northamptonshire.

Developer Contributions: Contributions made by a developer to remedy the impact of development, either by paying money for work to be carried out or by directly providing facilities or works either on-or off-site.

District Centre: A centre that provides a number of facilities to serve the community, such as a supermarket, library, other retail, health and leisure facilities.

District heating schemes: Central Heating and Power units that supply municipal heat and electricity to multiple dwellings. Heat recovery from industry or the generation from renewable energy sources can dramatically reduce the associated environmental impacts.

Dormitory settlements: An area that is predominantly residential with limited employment, characterised by residents commuting to urban areas for work.

Dwelling: A self-contained unit of residential accommodation.

East Midlands Regional Assembly (EMRA): The Regional Planning Body which had the main responsibility for preparing the Regional Plan for the East Midlands Region and the responsibility for the implementation of the Regional Plan.

East Midlands Regional Plan (EMRP): The Regional Plan provided the framework for determining planning applications, as well as for preparing both Local Development Documents and Local Transport Plans.

Ecological Footprint: Is a measure of human demand on the Earth's ecosystems. It compares human demand with planet Earth's ecological capacity to regenerate. It represents the amount of biologically productive land and sea area needed to regenerate the resources a human population consumes and to absorb and render harmless the corresponding waste.

Environment Agency: A UK government agency concerned mainly with rivers, flooding, and pollution.

Evidence Base: The information and data gathered by local authorities to justify policy.

Flood risk attenuation: Measures such as tanks and surface ponds that prevent water entering sewers and rivers to reduce water flow during periods of heavy rainfall with the potential for flooding.

Flood zone 1: An area with low risk of flooding. This zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding.

Flood zone 2: An area with a low to medium risk of flooding. This zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding or between a 1 in 200 and 1 in 1000 annual probability of sea flooding.

Zone 3a: An area with a high probability of flooding. This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding or a 1 in 200 or greater annual probability of flooding from the sea.

Zone 3b: This is an area within a functional floodplain. This zone comprises land where water has to flow or be stored in times of flood.

Green Belt: A national policy and land use designation used in land use planning to protect the openness of areas of largely undeveloped land surrounding major urban areas and conurbations. *[Note: There is no designated Green Belt land in West Northamptonshire].*

Green Field Land: Land, generally farmland, which has previously not been developed.

Green infrastructure: A network of connected, high quality and multi-functional open spaces providing multiple benefits for people and wildlife.

Growth Areas: Specific areas for new residential development to accommodate future population growth, as outlined in the Government's Sustainable Communities Plan (2003).

Gypsy and Traveller Accommodation Assessment (GTAA): The Housing Act 2004 requires local authorities to undertake an assessment of the accommodation needs of gypsies and travellers. This assessment is used to inform the amount of land that should be identified by the planning system to meet the needs of gypsies and travellers.

High Speed 2 (HS2): A fast rail route between London and Birmingham, with the possibility of extension to Glasgow or the East Midlands.

Hinterlands: The areas around villages and towns where infrastructure is less developed.

Hydrological Regime: The variability in the rivers discharge and flow rates throughout the course of a year in response to the physical characteristics of the river and the effects of weather.

In-migration: The movement of persons into a community/ population who originate from elsewhere.

Information and Communications Technology (ICT): Is the study, design, development, implementation, support or management of information systems. Information technology is a general term that describes any technology that helps to produce, manipulate, store, communicate, and/or disseminate information.

Interim Rural Housing Policy (IRHP): Is a temporary policy adopted by South Northamptonshire Council to manage and control housing delivery in rural villages and to ensure that a five year supply of housing land is available.

Issues and Options: Published by the West Northamptonshire Joint Planning Unit in September 2007. The Issues and Options stage was undertaken to identify the key issues and develop alternative options to help shape the next phases of the Joint Core Strategy for West Northamptonshire.

Landscape Sensitivity and Green Infrastructure Study: Undertaken to provide a review of the sensitivity of the landscape and landscape character, biodiversity, cultural heritage, flood zones and minerals resources surrounding Northampton.

Legibility: Locations, streets, open spaces and places that have a clear image and are easy to understand.

Milton Keynes South Midlands (MKSM): A designated growth area in the UK. It is made up of parts of three of the UK's regions (the South East, the East and the East Midlands) identified in the Sustainable Communities Plan (2003).

Milton Keynes South Midlands Sub Regional Strategy (MKSM SRS): Was published in March 2005. It covered parts of three regions, including the whole of Northamptonshire. The purpose of the document was to provide a clear, agreed, sub-regional strategy for the period 2001-2021, and a long-term spatial vision for the sub-region towards the year 2031.

Mixed use (or mixed use development): Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.

Modal interchanges: Strategic transport hubs, formed where two or more modes of transport meet.

Modal Shift: Is the change from one mode of transport to another, for example a reduction in private car use and an increase in bus use.

Modal Split: Is the number of journeys being made by each different transport type.

Mode: Type of transport being used for a journey.

Non B Employment Uses: Is a use commonly defined as including retail, tourism, leisure education, and health as set out by the Town and Country Planning Use Classes Order 1987 and its subsequent amendments.

Northampton Implementation Area (NIA): The area which will accommodate the growth set out in the East Midlands Regional Plan for Northampton. The boundaries of the area will be defined by the Joint Core Strategy and will cover Northampton Borough together with neighbouring parts of Daventry and South Northamptonshire Districts.

Northamptonshire Biodiversity Action Plan (BAP): Lists the most threatened habitats and species in the county, and sets out targets for action to aid their recovery.

Northamptonshire Strategic Employment Land Assessment (SELA) (2009): An independent study undertaken to evaluate employment forecasts and required strategic employment land supply to meet these requirements.

Orbital Bus Network: A bus route that connects key outer suburban developments without entering the town centre.

Out-Commuting: Those who are employed outside of the settlement in which they live whom travel between the two locations.

Park and Ride: A series of car parks located around the edge of a town or city with a dedicated bus service to take passengers to the centre (or other location, such as a football stadium) to help relieve car congestion.

Physical infrastructure: Includes existing and future development required to support utilities, transport and waste management.

Planning Policy Guidance Notes (PPGs): Are prepared by the government after public consultation to provide guidance to local authorities on planning policy. These are gradually being replaced by Planning Policy Statements.

Planning Policy Statements (PPS): National planning policy produced by Government, gradually replacing Planning Policy Guidance Notes (PPG's).

Planning Policy Statements/Guidance Notes – Full list:

PPS1: Sustainable Development & Climate Change

PPG2: Green Belts

PPS3: Housing

PPS4: Economic Growth

PPS5: Planning for the Historic Environment

PPS7: Rural Areas

PPG8: Telecommunications

PPS9: Biodiversity & Geological Conservation

PPS10: Waste Management
PPS12: Local Spatial Planning
PPG13: Transport
PPG14: Unstable land
PPG17: Sport & Recreation
PPG18: Enforcing Planning Control
PPG19: Outdoor Advertisement
PPG20: Coastal
PPS22: Renewable Energy
PPS23: Planning and Pollution Control
PPG24: Noise
PPS25: Flood Risk

Planning Policy Statements - Superseded/cancelled:

PPS6: Town Centres
PPS11: Regional

Potential Special Protection Area (pSPA): A pSPA is a designation under the European Union Directive on the Conservation of Wild Birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain threatened birds.

Principal Urban Areas (PUAs): Are identified as settlement conurbations that can develop into sustainable urban communities where people will wish to live and work.

Public realm: Areas available for everyone to use, including streets, squares and parks.

Quango: Quasi-autonomous non-governmental organisation to which government has devolved power. In the United Kingdom the official term is "non-departmental public body".

Regional Peripheries: Areas located towards the edge of a region.

Regional Spatial Strategies (RSS): Provided a broad development strategy for the region for a fifteen to twenty year period. (RSS8 was the East Midlands Regional Spatial Strategy).

Retail Leakage: The amount of money that is spent by people outside of their local retail catchment area.

River Nene Regional Park (RNRP): An independent community interest company creating a green infrastructure network of environmental projects along the River Nene.

Section 106 Agreement / Contribution: Refers to Section 106 of the Town and Country Planning Act 1990 and is a legally-binding agreement or planning obligation with a landowner in association with the granting of planning permission. These agreements are a way of delivering or addressing matters that are necessary to make a development acceptable in planning terms. They are increasingly used to support the provision of services and infrastructure, such as highways, recreational facilities, education, health and affordable housing.

Segregated network: Where public transport is segregated from mainstream traffic to allow for more efficient movement through key locations often in the form of bus lanes.

Sequential approach: A clear process following logically on from the previous stage.

Settlement conurbation: A large heavily populated urban area formed by the growth and merging of towns.

Shared surfaces: Streets without pavements designed and managed to allow people and vehicles to share the same highway.

Site of Specific Scientific Interest (SSSI): A classification notified under the Wildlife and Countryside Act (1981 as amended). SSSI is a conservation designation denoting a protected area in the United Kingdom.

Special Landscape Areas (SLAs): A countywide designation identifying the most extensive areas of locally attractive landscape which are special in a county context. SLAs were originally assessed by the County Council in 1972 and given protection through the planning process.

Special Protection Area (SPA): A designation under the European Union Directive on the Conservation of Wild Birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain threatened birds.

Social Infrastructure: Includes education, healthcare, sports facilities, cultural and community facilities.

Standard Assessment Procedure Energy Ratings (SAP): The SAP is the Government's recommended system for energy rating of dwellings.

Strategic Flood Risk Assessment (SFRA): Undertaken to provide a detailed and robust assessment of the extent and nature of the risk of flooding in the areas likely to accommodate significant growth.

Strategic Housing Land Availability Assessment (SHLAA): A technical document which assesses the amount and nature of land which could be made available for housing development. It is part of the evidence base that will inform the plan making process.

Strategic Housing Market Assessment (SHMA): A technical study which assesses housing need and demand across a defined market area and which is used to inform housing and planning policies.

Strategic Northamptonshire Economic Action Plan (SNEAP) (2008): A draft economic action plan for Northamptonshire developed by a wide range of key stakeholders to deliver the economic vision for the county as set out in the planning frameworks for North Northamptonshire and West Northamptonshire.

Sub-Regional Centres (SRC): Centres of economic or retail significance/size that are of lower significance than the main regional centre.

Supplementary Planning Documents: Provide additional guidance on matters covered by the Joint Core Strategy. They are not part of the statutory strategy, but form part of the Local Development Framework, and will be an important consideration in determining planning applications.

Surface Water Management Plans (SWMP): Can deliver flood risk and water quality benefits for new and existing development and are an essential tool to help coordinate investments across different public and private-sector bodies.

Sustainability Appraisal (SA): A mandatory procedure under the Planning and Compulsory Purchase Act 2004, to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of revisions of Local Development Frameworks.

Sustainable Development: Development that meets the current needs without compromising the ability of future generations to meet their own needs.

Sustainable Urban Drainage Systems (SuDs): Are designed to reduce the potential impact of new and existing developments with respect to surface water drainage discharges.

Sustainable Urban Extension (SUE): Planned growth that adjoins the existing urban area. Such growth will support existing and new communities through provision of education, health, community, cultural and social facilities, and linking new and existing communities physically and socially.

Topography: The gradient and variations in height within a landscape.

Urban Capacity Study (UCS): A study to identify the potential to accommodate housing development using previously developed land within existing urban areas. Urban Capacity Studies have now been superseded by Strategic Housing Land Availability Assessments (SHLAA).

Urban Fringe: The outskirts or edge of the urban area or settlement.

Urban Renaissance: A term used to describe the recent period of repopulation and regeneration of many British city and town centres.

Visual Amenity: A positive element/or elements that is clearly identifiable in determining overall visual character.

West Northamptonshire Development Corporation (WNDC): Was set up by the government in December 2004. Their mission is to promote and deliver sustainable housing growth and regeneration in Northampton, Daventry and Towcester.

EMERGENT JOINT CORE STRATEGY CONSULTATION RESPONSES – SUMMARY REPORT

Question 1

Question - Do you support the vision?

Summary of Key Points Raised in the Responses:

Support

- 1) The vision articulates the positive benefits that sustainable growth can bring.
- 2) The vision makes reference to all the main centres and includes a high degree of sub regional specificity. Focusing growth on the main urban areas makes the best use of existing and planned infrastructure and accords with the Regional Spatial Strategy (RSS).
- 3) The vision is supported as it relates to Brackley, Towcester and Daventry as it allows for natural progression.
- 4) Support Northampton being the heart of the County.
- 5) The emphasis on education, training, and research within the vision is welcomed.
- 6) The recognition of the importance of a network of green spaces, high quality parks and gardens and beautiful villages and landscapes within the vision is welcomed.
- 7) The importance of supporting a balance between housing and employment opportunities is represented in the vision which is considered a key requirement for growth.
- 8) Reference to the significant assets of Silverstone Circuit and Daventry International Rail Freight Terminal (DIRFT) is welcomed.
- 9) The vision is needed to help Northampton move with the times and face up to the issues of homes, jobs, regeneration and immigration for years to come.
- 10) The vision is supported in its recognition that the successful future of West Northamptonshire depends on exploiting the opportunities of a knowledge-based economy. However, this is not reflected in the location of housing growth and the infrastructure investment.
- 11) Commend the vision of Northampton to become a city, and the achievement of city status.

Question 1 – (Support) continued

- 12) We need to improve [Northampton] town, and this is a good start.
- 13) The vision is good in principle so long as the growth is gradual.
- 14) Strongly support the sentiment that it is not an option to say no to the principle of growth.
- 15) Growth at Towcester Vale will help support the vision.
- 16) The vision is in accordance with national and regional policy.

Object

- 1) The vision is too far reaching in the current economic climate. It is very long sighted to 2026 and will need to alter in the subsequent years.
- 2) Northampton does not need to be a city to be great. The focus should be on regeneration and renewal rather than growth. The town must work as a modern market town and improve what it already has first.
- 3) The vision is foolhardy and will lead to a reduction of living standards for both existing and new residents.
- 4) The vision is not distinctive and cannot be achieved by the strategy within the document. An alternative vision is suggested i.e.: *“to regenerate and reinvigorate Northampton as a vibrant riverside market town with a distinctive local character linked to a wide and attractive rural hinterland, a diverse range of housing and communities, an interesting and distinctive cultural offer”*.
- 5) The vision is opposed as there is no guarantee that the required infrastructure will be quantified, funded or delivered or that the required jobs will be created.
- 6) The vision is little more than a vehicle for the development industry and their profit driven agenda and that the vision for Northampton’s expansion into a city which would engulf surrounding villages is not accepted.
- 7) New development should be accommodated on brownfield sites and the towns of Towcester, Daventry and Brackley. Any expansion of Northampton must maintain clear beaks to surrounding villages.

Question 1 – (Object) continued

- 8) The geographical position, economic, social reality and history combine to mean that Northampton has no hope of becoming “a great riverside city”. It cannot compete with other centres such as Milton Keynes and Cambridge. A more realistic vision is suggested: *“that Northampton becomes a regenerated and reinvigorated vibrant riverside market town with a really distinctive character of its own with good quality housing and infrastructure catering for all members of a diverse but integrated community, linked to a wide and attractive rural hinterland. The Town Centre of Northampton would have a number of suitably sized and varied retail outlets and cultural attractions accessible to all who wanted them. Communities will be genuinely sustainable.”*
- 9) The second paragraph should be amended to read: *“Northampton Town centre will be the focus for mixed used development but well located edge of urban centre sites and adjacent areas also have a role in accommodating future development needs to maximise the regeneration benefits of development and enhance the district’s overall urban environment.”*
- 10) The vision should recognise that Brackley has greater opportunity to accommodate development than Towcester.
- 11) The vision is too parochial and lacks vitality with big ideas being missed.
- 12) The vision should be more realistic and be explicit about the problems faced, e.g. parking issues, loss of environment, and housing conditions that are the most cramped in Europe.
- 13) The vision needs to articulate the challenges in relation to urban design.
- 14) The vision should refer to the orbital routes around the town [Northampton] allowing people to access employment and facilities otherwise people in the north will be cut off from employment in the south.
- 15) There should be greater alignment between the vision and objectives of the *Sustainable Communities Strategies*.
- 16) The vision is weak for the rural areas as it is too urban focused.
- 17) The vision is too general and lacking in specific details for future generations.
- 18) The vision does not see the area in its broader context, its relationship with North Northamptonshire and the area beyond.

- 19) The vision should recognise that the villages are capable of supporting growth to help support rural services.
- 20) Reference should be made to the successful delivery of Sustainable Urban Extension within the vision as their delivery is key.

Question 1 – (Object) continued

- 21) It should be accepted that Rugby is the principal workforce supplier for Daventry International Rail Freight Terminal (DIRFT). There is no public transport service between Daventry and DIRFT at shift.
- 22) The vision contains insufficient information in relation to rail freight.
- 23) The vision for Brackley becoming vibrant is not shared and the trend to create apartments and flats will make it a sleepy market town.
- 24) The vision should reflect more closely the vision for Towcester set out in the Towcester Masterplan as it provides a more positive description of the town and aims to secure an increase in the promotion of its assets.
- 25) There is no point in pursuing the vision or objectives until such time as the necessary infrastructure is in place to support such change in our region.
- 26) An increase in population requires a New Town - such as Milton Keynes - where it can be planned.
- 27) The vision needs to focus on how to make places work better and should tell a story.
- 28) The vision should be locally distinctive.
- 29) Northampton can not compete with Milton Keynes, Oxford or Cambridge in terms of its economic profile, retail, cultural offer and attractiveness.
- 30) The vision should include Weedon Depot as a site of important heritage and cultural significance.
- 31) The vision omits the area to the North of West Northamptonshire and cannot be supported until the whole of the area is included.
- 32) Cannot support the vision as it is believed that it contains factual inaccuracies, such as Northampton being a city.
- 33) The emergent vision fails to effectively relate to the existing characteristics of the area and the key challenges set out in the Spatial Portrait.
- 34) The vision will destroy agricultural land.

Question 1 – (Object) continued

- 35) The vision should include reference to the A45 Flore-Weedon Bypass.
- 36) The vision is not consistent with the strategy i.e. Climate Change and the construction of a new road.
- 37) To be a riverside city requires a river bigger than the Nene.
- 38) The vision must recognise the fact that Daventry (town and district) is more important than Towcester and Brackley.
- 39) The vision should include reference to improving public transport links for Towcester to Northampton, Milton Keynes and Banbury.
- 40) The vision does not give sufficient consideration to traffic generation.
- 41) The vision should include reference to revitalising historic assets.
- 42) The vision should make reference to the University Arc concept.
- 43) The role of rural settlements/ communities should be referred to in the vision.
- 44) The vision should refer to wildlife and biodiversity.
- 45) The vision underestimates the amount of regeneration the town [Northampton] requires.
- 46) The vision should include the role of the development sector in providing funding for physical and social infrastructure.
- 47) The combined vision has not been subject to consultation to testing.
- 48) The vision should include Unitary Authority Status for Northampton.
- 49) The vision should state explicitly that the growth of Northampton should create a compact urban form - new developments should clearly be extensions of the existing town and not linked new settlements.
- 50) The spatial vision does not highlight the benefits of sport and its relationship to community cohesion and regeneration.
- 51) The vision does not include a substantive community plan for safety, social capital, community cohesion and spiritual as well as physical well-being.

Question 1 – (Object) continued

- 52) The vision should make acknowledgement of the significant housing growth at Daventry and the concept of growing the town to twice its current size. More emphasis should be placed on the role of the town centre.
- 53) The description of Brackley within the vision needs to be strengthened and should mention Brawn GP (Mercedes).
- 54) The vision should include references to thriving faith communities, voluntary and community sectors.
- 55) There could be a better recognition in the vision of the contribution that existing high quality built environment makes to the character of the area and future place-making.
- 56) Sustainability should be a central theme of the vision. The vision needs to explore in more detail what a sustainable community might include.
- 57) The vision lacks a sense of place.
- 58) The vision should emphasise the expansion of Northampton will be on going beyond 2026.
- 59) Object to the alteration of the vision from that shown in 2007 at Appendix B of the *Emergent Joint Core Strategy*.

General Comments

- 1) Change is not embraced by our councillors.
- 2) Growth can only be accommodated in a new town with new infrastructure.
- 3) The vision is more a statement of the current position as opposed to a vision for the future.
- 4) The vision is reliant on achieving growth set out in the Regional Plan and is immaterial if you do not support the principle of growth.
- 5) Northampton as an historic market town cannot accommodate expansion.
- 6) More transparency is needed in the document rather than a vision if the population is to support the plan.
- 7) The vision needs to be mindful of the changing nature of the environment and climate.

Question 1 – (General Comments) continued

- 8) The vision excludes transport infrastructure outside the strategy area, as does the *Milton Keynes and South Midlands Sub-Regional Strategy* (MKSM SRS).
 - 9) The vision should promote an attractive riverside town, with niche shops and small businesses.
 - 10) The tense of the vision should be conditional, for example "*Northampton could have...*".
 - 11) The vision should contain less jargon.
 - 12) Small scale development should be released to support the overall vision.
 - 13) Care should be taken to ensure the vision statements do not conflict, for example "diverse employment opportunities" might impact on the "green spaces network", and the outward growth of settlements will impact on "beautiful tranquil villages and rolling landscapes".
 - 14) The vision should be the key element of consultation because unless the public and existing residents accept it, delivery will not happen without objections.
 - 15) There needs to be clearer links between the *West Northamptonshire Joint Core Strategy* spatial vision and the vision within the *Northampton Central Area Action Plan*.
 - 16) To achieve the vision you must examine where Northampton is failing to provide in general terms, and what people find attractive elsewhere. It is insufficient to think that by expanding the population so that it may be called a city is a ready made solution. The present proposal does nothing to answer the questions of how other towns have made the transition to a city.
 - 17) The reference to Northampton becoming a city is not reflected in the objectives.
 - 18) Facilities at Northampton should complement not compete with Milton Keynes.
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Question 2

Question – Do you support Objective 1? ‘To deliver the planned growth in West Northamptonshire as required through the East Midlands Regional Plan and Milton Keynes and South Midlands Sub Regional Strategy, through the provision of managed growth and necessary infrastructure principally focused on Northampton, but also Daventry, Towcester and Brackley

Summary of Key Points Raised in the Responses to Question 2:

Support

- 1) Planned growth is supported providing all relevant infrastructure is in place and support is provided from the Government and the Regional Government.
- 2) The objective is supported as the whole area is considered rather than each population centre considered in isolation.
- 3) Focusing development around Northampton is fully supported.
- 4) Objective 1 is seen as a positive acknowledgement and sound interpretation of proposals set out in the *East Midlands Regional Plan*.
- 5) This objective is supported as there has been and will continue to be necessary expansion as the area is centrally located in the UK.
- 6) The objective is supported as Brackley needs to be developed to support its market town status and to support community development within the town and surrounding villages.
- 7) The objective is supported. It focuses growth on Northampton, Daventry, Towcester and Brackley which is key to addressing the ‘sustainable communities’ objectives.
- 8) The objective is supported. It focuses growth on the towns to enable regeneration and enable Northampton to become a place that the population are proud of which will instil ownership and community cohesion.
- 9) The objective is supported. The implementation of Dallington Grange will enable an early start to the achievement of this objective.
- 10) Objective 1 is supported as it will assist regeneration of the urban communities, focus development upon existing urban areas rather than creating additional ones and justify the upgrading of the road networks serving these conurbations.

Question 2 (Support) continued

- 11) The principle of growth for Northamptonshire is supported as long as it is sustainable and structured. Too much focus is however placed on Northampton South East.
- 12) The objective is supported as it supports the University's new strategic plan to be a "University in many places". The University Strategy sees Northampton having foci around creative technologies, health and well-being, Daventry around sustainable technologies and Towcester around high performance disciplines.
- 13) Growth should be delivered in Northampton first as it has diverse communities, can provide affordable housing and employment.
- 14) Supported as long as there is the provision for the development for affordable housing for local people in the villages.
- 15) A by-pass at Towcester will provide for the long term growth of the town.
- 16) Planned growth is preferable to ad hoc development.

Object

- 1) The amount of new infrastructure required to deliver growth and how it will be funded is not set out adequately within the document. In the past growth and the commensurate infrastructure have never been efficiently managed.
- 2) The definition and aspirations of each of the towns needs to be further defined.
- 3) There is no clear guide that the highway infrastructure will be built to make growth sustainable.
- 4) The existing infrastructure is inadequate even for the present population before an increase in dwellings.
- 5) The plan takes insufficient account of sustainable development (the urban area of Northampton needs rejuvenation first), flood dangers and management of pollution.
- 6) The planned growth is unsustainable, a new town in a much better solution.
- 7) Only in support of selective starter homes on a limited scale in towns and villages where the infrastructure is already in place.

Question 2 (Object) continued

- 8) The amount of development required by the plan will have negative effects on a number of villages and is too dramatic in one bit hit.
- 9) This will only bring about gigantic boxes amongst office blocks.
- 10) Empty properties should be filled first.
- 11) Object to the Strategy of destroying the countryside and communities.
- 12) The objective is not supported because there should be provision for low cost housing for the younger generation in their own locality which would reduce the need to commute and create a more social environment for new and existing residents.
- 13) An objective that allows development to extend into the greenbelt would not be supported.
- 14) The plan is not aligned with the *East Midlands Regional Plan*.
- 15) The objective should be more spatially specific.
- 16) The data on which planning is made is out of date.
- 17) Due to the large numbers of empty homes and brownfield sites, the requirement for housing growth is overstated.
- 18) The new housing should be on brownfield sites in the north of England where the jobs are needed.
- 19) The planned growth should include a much broader area of England, including in the North and South.
- 20) Growth should be spread around a much bigger area than the Milton Keynes South Midlands are and not necessarily in such concentrated proportions.
- 21) The plan is deficient and does not meet the test of soundness as required by Planning Policy Statement 12: *Local Spatial Planning*. The lack of information regarding the evidence base contributes to this fact.
- 22) People will strongly object to the plans as the regeneration of Northampton will never occur and people are much more likely to go to Milton Keynes.
- 23) The suggested growth in the *Emergent Joint Core Strategy* is no longer required due to the economic downturn, the lack of employment in the area and the lack of attractiveness of Northampton as a place to live and work.

Question 2 (Object) continued

- 24) The growth will destroy the ancient market town of Northampton.
- 25) Northampton has already received more than its burden of population growth in the past 40 years and is totally out of keeping with the area's ability to sustain the population in terms of commercial and industrial activity.
- 26) Many of Northampton's inhabitants out commute to enhanced economic growth elsewhere, unless it is to do with 'sheds' (warehousing) which thrive in Northampton.
- 27) Northampton has not managed to integrate the development in the 80s and 90s, let alone anything more.
- 28) The last time Northampton was developed a large number of undesirable people were shipped in by the London overspill.
- 29) Planned growth for Brackley is not supported.
- 30) Towcester and Brackley should be left as small towns.
- 31) The objective is not supported as there are no employment prospects and will not be in Towcester and Brackley has little labour requirements.
- 32) Brackley and its links to rail, health and shopping are more related to Oxfordshire than to Northampton.
- 33) The proposed development can never be integral to Daventry as it is separated by Borough Hill on one side and the Reservoir on the other. The development proposed in the Parish of Norton will result on the destruction of productive farmland, wildlife habitats and historical sites.
- 34) Northampton, Daventry and Brackley should have equal shares in the growth.

General Comments

- 1) The growth targets contained within *the East Midlands Regional Plan* are not being met.
- 2) What has West Northamptonshire's International position got to do with this very parochial issue?
- 3) The role of Daventry should be differentiated from Towcester and Brackley.

Question 2 – (General Comments) continued

- 4) Is there a strategy to support the provision of community buildings such as Churches?
- 5) The *Regional Spatial Strategy* (RSS) growth requirements and population predications are inaccurate (too high), and this should be challenged and reduced through the RSS review. Who is going to buy all these houses in the current economic climate?
- 6) Figures beyond 2026 should, at this stage, be discounted as being beyond the Regional Plan period.
- 7) The figures for the Northampton Implementation Area should be amended to coincide with the RSS figures. Change the figures from 43,000 to 40,375. The core strategy must be in conformity with the RSS.
- 8) Figures for committed development should be provided to enable a meaningful comment to be given.
- 9) The *Joint Core Strategy* should set out realistic and deliverable local figures which can be fully explored and debated at the public examination.
- 10) Rural settlements must not be allowed to stagnate.
- 11) Growth will require sensitive management in terms of locations for new development and management of town centres which need to be based on an understanding of the historic environment.
- 12) The balance of growth between Northampton and the smaller towns of Daventry, Towcester and Brackley is questioned .Too much is being focussed on Northampton.
- 13) Rather than creating more vast estates on the edge of the town, the focus should be on regeneration of existing housing areas and the use of Brownfield land for housing and employment before Greenfield land.
- 14) Radical and substantial infrastructure solutions are needed to combat existing and future problems associated with traffic growth.
- 15) Infrastructure (roads, public transport, recreational, retail) must be in place before or at the beginning of the development process. These issues should be addressed in advance.

Question 2 – (General Comments) continued

- 16) Housing provision identified within *the Joint Core Strategy* appears to be inline with the population increase and housing requirements detailed in the *Milton Keynes and South Midlands Sub Region Health and Social Care Services Provision for the Future*. This would necessitate the need for increased provision of community-based clinics and delivery of care at home. The development of areas further away from the main hospital site would dictate a need for satellites, such as radiography units and community hospitals, to meet the projected demand.
- 17) A balance of homes and jobs is vital to ensure community cohesion and boost the economy.
- 18) It is considered that Swan Valley can assist in delivering the employment requirements as it is an important strategic location.
- 19) Essential infrastructure was to be ensured by government funding, but it is now evident that the Government's Growth Area Funding is to be cut by 40 percent.
- 20) The *Emerging Joint Core Strategy* was not accompanied with any Sustainability Appraisal which is considered to be fundamental to this Consultation.
- 21) The definition of Northampton needs further qualification as it is not clear if Grange Park (within South Northamptonshire District) is part of Northampton.
- 22) It may be beneficial to consider small developments to existing villages which would create local growth and additional local amenities.
- 23) Low cost housing for the younger generation in their own locality would reduce out commuting and create a more sociable environment for new and existing residents.
- 24) Whilst it is recognised that economic growth is vital, it would appear that there is more housing proposed than employment.
- 25) Further development should only be permitted if it is appropriate in scale and does not impact on the character. There may be scope for development linked to farm diversification and small rural shopping and craft developments.
- 26) The objective should make reference to all strategic employment sites and all growth options should be shown on the key diagram.
- 27) More flexibility is needed in the plan to enable the strategy to deliver beyond 'planned' growth and to respond to economic cycles (boom and bust).

Question 2 – (General Comments) continued

- 28) Milton Keynes should not be used as a model for development and Northampton should not be linked with Milton Keynes, Luton and Daventry.
- 29) In view of the errors made in this document and past experience of 'planners' and the 'democratic process', there is little confidence in there being satisfactory implementation of the strategy or management of growth.
- 30) A plan to incorporate any new growth into an integrated town system must be applauded, but the town centre must be integral to this and any development must be closely linked to and accessible to it.
- 31) The document fails to recognise the role of Brackley as a market town and a defined rural service centre and the potential it has to serve a wider rural catchment area. Also the capacity of Brackley as a future science Centre has been underestimated, as it could provide for additional growth.
- 32) The majority of planned growth should be delivered within the key settlement areas, however further planned growth should be provided for within the smaller rural settlements, such as West Haddon and Passenham.
- 33) The Objective should be expanded to recognise the unique characteristics of Silverstone and identify its strategic role in delivering balanced sustainable employment and housing growth alongside infrastructure. As it has been identified that there is insufficient land identified to meet the *RSS* employment figures, the inclusion of Silverstone would help to rectify this inconsistency.
- 34) Catch yard farm is available now and achievable for housing development within the next 5 years and is suitable for meeting the short term need in south Northamptonshire.
- 35) In the absence of a *Strategic Housing Land Availability Assessment* there is some uncertainty about the availability and deliverability of the estimated yield from within the existing built up area.
- 36) The reference to the *South Midlands Sub-Regional Strategy* should be deleted as the Core Strategy needs to accord to the *East Midlands Regional Plan*.
- 37) The principle of phasing development from 2021-2031 is supported, but it is considered that the additional housing growth (2,200) dwellings should be allocated to Towcester South to secure the level of development necessary to deliver the required level of infrastructure.

- 38) We urge your committee to reappraise the goals you have been set by central government and to identify sites that are more suitable for easy and less costly redevelopment.

Question 2 – (General Comments) continued

- 39) There is a significant amount of unmet demand for development of strategic distribution in development in West Northamptonshire. This type of development is more appropriately located outside main urban areas and in proximity to sustainable transport corridors to secure movement of freight by non-road means, such as the Northampton Loop of the West Coast mainline for rail purposes. The locational requirements of this form of logistics should be clearly differentiated from the focussed growth at or on the edge of identified settlements.
- 40) The strategy must consider the findings of *Strategic Employment Land Assessment (SELA)* and *Strategic Northamptonshire Economic Action Plan (SNEAP)* in terms of jobs growth. The strategy should not constrain employment growth in the area.
- 41) The objective does not acknowledge Daventry's role as a sub-regional centre.
- 42) All of the current centres of pollution are culturally underdeveloped and so need this incentive for change and development.
- 43) Infrastructure needs to include increased leisure provision.
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Question 3

Question – Do you support Objective 2? To exploit West Northamptonshire’s position internationally for economic advantage by facilitating significant employment growth and opportunities for knowledge based industries and environmental technologies.

Summary of Key Points Raised in the Responses:

Support

- 1) Objective 2 is supported. Employment growth is essential for the vision to succeed and there is a need to ensure that this vision can attract new employers and diversification with other industries.
- 2) There is serious competition from surrounding areas and it is important that the objective is fulfilled to ensure the area does not stultify and result in high out-commuting.
- 3) The principle of growth is accepted provided it is sustainable and has adequate infrastructure.
- 4) The University is considered to be a major exporter attracting over £6 million of direct income from international markets. The respondent would therefore urge a stronger recognition for the role of the University in attracting international inward investment around its core competencies.
- 5) The objective is supported in principle but requires further information and clarification.
- 6) Due to the decline in manufacturing knowledge based industries are the future.
- 7) Fostering an environment of high value employment growth is essential and should be a prerequisite to housing growth.
- 8) The skills base in the area must be improved before knowledge based industries and environmental technologies industries will locate to the area.
- 9) *Emergent Joint Core Strategy* must identify Silverstone Circuit as a ‘Strategic Employment Site’. Through the delivery of the Masterplan, Silverstone is capable of playing a key role in supporting this objective - fostering the continued success of the motorsport industry and the employment space associated with the circuit.

Question 3 (Support) continued

- 10) Support continuation of Daventry International Rail Freight Terminal (DIRFT) as an internationally significant centre for strategic distribution and job opportunity for local people.
- 11) Objective 2 is supported in principal but should be expanded to include the creation of a University Arc linking the town centre to the University village of Moulton with knowledge based, high technology led investment.
- 12) More of these 'clean jobs' are good for the environment and for the town, creating a specialism and enhancing prosperity.
- 13) Geographical advantages, communication linkages, and proven track record of West Northamptonshire will encourage the planned level of employment growth.
- 14) The technology quarter at Moulton should form part of the proposal.
- 15) Knowledge based industries and environmental technologies will become increasingly important as resources decline.
- 16) The delivery of the Dallington Grange development will make an important contribution toward the achievement of this goal, providing office industrial and warehouse and distribution uses.
- 17) Intentions to allocate sufficient land located close to a suitable workforce and the strategic highway network as Sustainable Urban Extension should be highlighted.
- 18) Knowledge based industries and environmental technologies should be focused to the north of Northampton where higher education, learning institutions and enhanced links with businesses can be exploited.
- 19) West Northamptonshire is well situated to exploit indigenous resources, waste streams and agricultural produce to encourage knowledge based industries and environmental technologies.
- 20) Employment opportunities are required to increase at a faster rate than population growth to reduce the current trend of people living in the area and travelling some distance to work.

Object

- 1) Employment growth will be in the Transport and Logistics industry which will not provide the sufficient salaries to support home ownership.
- 2) A completely unrealistic objective.

Question 3 (Object) continued

- 3) Planners have caved in to the demands of warehouse developers, offering low rates of employment and destroying the countryside. Warehouse development must be resisted.
- 4) The objective is unclear. What is the significance of West Northamptonshire's position internationally as opposed to other regions? What technology development is envisaged?
- 5) Growth should be contained. Many towns within the area are already overcrowded.
- 6) The required calibre of professionals will not be attracted given the current lack of any suitable cultural or leisure amenities.
- 7) Revitalisation of the area needs to be considered before growth.
- 8) National and international competition, locations closer to major Universities, and lack of established facilities will direct employment growth to areas other than West Northamptonshire.
- 9) There are ample technology opportunities and establishments, with employment growth in Northampton declining over the past ten years.
- 10) Growth should be organic. It should not force unnatural demands, and should appreciate finite resources.
- 11) Growth should not be at the detriment of the current farming and agriculture land.
- 12) Northampton cannot exploit its position internationally as it has no status or links internationally.
- 13) An employment location on Junction 16, M1 will not attract the desired types of jobs. It will encourage unsustainable transport patterns and jobs that are unavailable to the new residents of Northampton.
- 14) Further employment opportunities should be located in the North of England where unemployment is highest.
- 15) Employment growth is reliant on huge housing growth which is unsustainable and will encourage a large uptake of greenfield land.
- 16) Policy should be focused on sustainability in world terms, not local competitive advantage.
- 17) Development must not be at the detriment of the counties' assets, particularly the rural areas and settlements.

Question 3 (Object) continued

- 18) Projections for new jobs are half that of new households. This will lead to an overall under-provision of employment opportunities and increased unemployment.
- 19) Specialist knowledge based industries in the area have recently declined. This situation could worsen following the cessation of (Formula One) F1 at Silverstone.
- 20) Objective is not supported. This is just an excuse for pointless international trips by West Northamptonshire Joint Planning Unit executives.
- 21) The objective is too biased toward knowledge based industries and environmental technologies. A more balanced approach should be taken which accounts for existing and potential warehouse and distribution industry and the large numbers of people within the local area working within this sector (including the associated managerial and skilled support staff).
- 22) Creative industries should be included in the objective.

General Comments

- 1) Policy restricting warehouse development is required. Failure to succeed in this area will result in a reduction in living standards and employment will not be guaranteed.
- 2) Northampton is strategically positioned to benefit from logistical and warehouse development. There are more appropriate areas within the UK and internationally where knowledge based industries and environmental technologies would be more suited.
- 3) Distribution requires a good road system although very little new road building is proposed.
- 4) Diversification away from distribution would have benefits for the local economy and likely to have less impact on the landscape.
- 5) Northampton Borough Council and West Northamptonshire Development Corporation have failed to attract skilled industries to the area.
- 6) The delivery of 'new jobs' by 2026 is questionable.
- 7) Reference should be made to increasing value-added (higher salaried) jobs.
- 8) The area needs a greater mix of employers.

Question 3 (General Comments) continued

- 9) Policies must provide strict restrictions on preventing focus on B8 (Storage and Distribution) development.
- 10) Northampton has already proved itself to be of value in the international world of industry and technology.
- 11) Leisure and culture businesses must be included.
- 12) Invest in skills and technologies that already exist and increase the knowledge base – motor sport industries, Daventry International Rail Freight Terminal (DIRFT) and credit card offerings.
- 13) *'Knowledge based industries and environmental technologies'* is far too restrictive and potentially damaging to future economic growth. The Core Strategy must remain flexible and encourage employment development across all uses.
- 14) The objective does not set out a clear investment strategy, policy or initiative for knowledge based or environmental industries. The area is not supported by important research centres or Universities and significant investment in science parks will be needed but is currently lacking in this proposal.
- 15) Provision of employment opportunities which include both B-Class and non B-Class (commonly defined as including retail, tourism, leisure education, and health) uses as part of a mixed-use regeneration scheme should be considered favourably.
- 16) West Northamptonshire cannot compete with the relocation of the traditional knowledge base industries to India and other offshore locations.
- 17) Improved transport links within West Northamptonshire and to areas beyond its boundaries must be sought. No detail has been provided to explain how this will be achieved.
- 18) Guaranteed funding for infrastructure is needed. Developer finance should not be relied upon.
- 19) Improve rail freight capacity to ports.
- 20) Brackley should exploit its location and become a high quality cultural environment for people in the 21st century. The capacity of Brackley as a future science centre has been underestimated.
- 21) The word 'exploit' does not fit within the context of the document. The words *'take advantage of West Northamptonshire's position'* are preferred.

Question 3 (General Comments) continued

- 22) It is important that Northamptonshire Police are involved in any employment initiatives to ensure crime prevention measures are considered at the outset so that areas are safe places where businesses want to locate.
 - 23) Concerns over achievability of the objective without massive state intervention.
 - 24) Growth should be employment led followed by housing to reduce existing unemployment.
 - 25) The objective should be delivered through sustainable urban extensions on greenfield sites and the recognition in the Strategy of the role of these sites to attract inward investment.
 - 26) Lack of reliable figures relating to jobs over the plan period should not arbitrarily hold back residential growth because jobs are not being created at an equivalent rate, or vice versa.
 - 27) Ethical, social and environmental considerations must be fully taken into account.
 - 28) Damage to existing towns must be limited.
 - 29) Future growth should be directed toward Northampton, Towcester, Brackley and Daventry and new and existing communities should be physically and socially linked as this will help to achieve more sustainable development.
 - 30) The evidence base is mentioned although there is a lack of evidence to support this objective. Plan is therefore not considered sound under the requirements of *Planning Policy Statement 12: Local Spatial Planning*.
 - 31) A variety of suitable and viable employment sites should be provided to encourage competition between developers, benefit end users and stimulate economic activity.
 - 32) The objective should acknowledge the requirement for both previously developed land and greenfield land.
 - 33) Consider small scale hydro-electric for environmental technologies.
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Question 4

Question- Do you support Objective 3? 'To support existing and new communities through the provision of education, health, community, leisure, cultural and social facilities, linking new and existing communities physically and socially'

Summary of Key Points Raised in the Responses:

Support

- 1) Support in principle – but requires further clarification and information.
- 2) This is the most critical objective and that the provision of services and facilities should be diverse, of high quality and imaginative. If not provided progress will pass the area by.
- 3) Support the objective as it supports protecting villages and their integrity and locating primary health care in the villages.
- 4) A key issue for the regeneration of the whole area.
- 5) The objective is considered essential to link existing and any new communities that may be created and to ensure adequate facilities are provided to cater for both new communities but also to address the current shortfall.
- 6) High quality further and higher education is essential and building upon centres of excellence such as Moulton College should be regarded as central to achieving these goals.
- 7) Support the objective but infrastructure and facilities need to be provided first. A clear indication of what infrastructure is required and how it will be funded is needed. Very few tariff/standard charge agreements have been signed between West Northamptonshire Development Corporation (WNDC) and the developers. Planning obligations must accord with Circular 05/2005.
- 8) Support for this in relation to existing communities who are not currently catered for.
- 9) Mereway District Centre has an important role to play as the 'heart' of East Hunsbury'. The area does need regenerating, and new development should be used to fund and facilitate the enhancement.

Question 4 (Support) continued

- 10) Dallington Grange will provide a full range of facilities to support the new community and has also been planned to deliver facilities and services of benefit to and to be shared by the surrounding communities. This development will also act as a catalyst for the regeneration of the Kings Heath area of Northampton.
- 11) Support this objective however mass housing will not provide the improvement.
- 12) Integrated facilities are required to support expanded housing and industry.
- 13) Support the principles of master planning of the urban extension at Northampton South East as it will support both new and existing communities through the provision of appropriate facilities.
- 14) Support this objective however young people's provision needs to be more than just play areas; it needs to encompass youth shelter, appropriate hang out areas and sports needs.
- 15) Support however Northampton is good at 'soulless' housing estates and nothing else.
- 16) Support but conditions must be imposed to ensure these facilities and services are delivered.
- 17) This objective will make Northampton a diverse town and foster a good economy.
- 18) Community facilities will deter criminals and help veer them away from boredom.
- 19) Good for social cohesion.
- 20) Sometimes linking old and new communities is not appropriate for instance when both the old and new communities are both self-contained and exist happily on their own.
- 21) Support this objective however there is no coherent or sensible proposals for connecting communities in Daventry and its rural hinterland. Buses are preferred over 'pods' as they are more economically sensible and more easily accessed by all ages.
- 22) This is essential for a balanced local economy.
- 23) This is vital to facilitate the regeneration of Daventry, Towcester and Brackley.

Question 4 (Support) continued

- 24) The establishment of linkages and connectivity between existing and new communities is key in spatial planning terms.
- 25) It may be possible to improve these facilities through housing related growth in appropriate locations such as Crick Village.
- 26) Support the objective, but rural areas need to be included.
- 27) Support the objective but not in the villages.

Object

- 1) Both the councils and WNDC have singularly failed to provide essential infrastructure at Northampton and its satellite towns in the past in step with housing expansion. Consequently there is no confidence it can be provided for the future.
- 2) The document gives no detail of what will be required, how much it will cost and how it will be funded.
- 3) There are serious doubts about the policy in relation to education as there is no firm commitment to building new secondary schools and the schools are already full.
- 4) The objective sounds fine but the proposals in the Plan do not meet the objective.
- 5) There is concern about healthcare as Northampton General Hospital has no capacity to expand on its present site and there is nothing in the strategy allows for new hospital facilities for Northampton.
- 6) There are already enough issues in Northampton that need to be dealt with. Introducing new houses will only create new issues and will accentuate the existing problems.
- 7) The proposed developments are in conflict with Objective 3 as the engulfment of outlying villages would destroy their essential spirit and community identity which makes them what they are. Communities are strongest when they have a clear identity.
- 8) Communities should not be linked in this imposed way; rather they should be encouraged to develop organically through their own democratically elected bodies and processes.
- 9) Linking existing communities physically means destroying ancient and distinctive villages – this is vandalism on a massive scale.

Question 4 (Object) continued

- 10) Do not support if linking communities physically means joining them by infill.
- 11) Northampton town is in need of cultural regeneration and currently lacks cultural offer with the theatre being the only culture available. There is no detail of the level of cultural facilities that are to be provided.
- 12) Northamptonshire is consistently under funded and short-changed by Central Government in regards to infrastructure.
- 13) Per capita funding is based on incorrect government population figures that do not take into account migrants from the enlarged European Union that fluctuate regularly.
- 14) None of the areas of expansion around Northampton have become in any way 'sustainable communities'. An example of this is the oldest extension, the Eastern District of Northampton where there is no community spirit despite community facilities being delivered as part of the development.

General Comments

- 1) The involvement of new and existing communities is vital to the achievement of this objective and the consultation process to date has not been adequate or effective.
- 2) The word 'training' should be added.
- 3) The only people receiving support in Northamptonshire are immigrants who have now taken over the county.
- 4) Cultural facilities can include historic sites whether for visits or activities that takes place at historic venues. The boot and shoe heritage contributes to the area's distinctiveness.
- 5) The *Emergent Joint Core Strategy* does not appropriately consider the role of the 'rural areas', which account for the majority of the geographic areas and specifically the key rural service centres.
- 6) Communities should be left to grow organically over time and generate their own social structures.
- 7) It is essential that services are in place at the earliest opportunities if access to secondary care (hospitals) is to be in line with the England average; presently both Daventry and South Northampton have been identified as areas where access is below the national average.

Question 4 (General Comments) continued

- 8) The linkages between new and existing communities should be maximised through the provision of joint facilities where possible.
- 9) It is important that growth benefits existing communities and that the strategy should consider the role of the third sector in delivering support to these communities. Further efforts should be made to ensure activities such as Construction Futures the provide training and skills should be provided through Section 106 agreements.
- 10) Listing infrastructure needs by type (such as education and health) gives the impression that other types seem less important.
- 11) Specific reference to sport should be included. The use of the terminology *Planning Policy Guidance Note 17: Open Space, Sport and Recreation* throughout the document would be of use as would an indication of what is envisaged by community facilities.
- 12) Central Government funding is essential, as the burden currently imposed upon developers renders most development unviable.
- 13) Provision for young people needs to be more than just play areas; it needs to be youth shelters and more appropriate hang out and sports facilities.
- 14) Where smaller developments occur within villages this would bring the need for more of these facilities to be provided closer to their customers, reducing the need to travel, helping the environment and in some cases reducing the need for new road networks.
- 15) The restoration of the Old Stratford and Buckingham Arms of the Grand Union Canal would restore links between the villages of Cosgrove, Old Stratford and Deanshanger bringing together their shared heritage.
- 16) It is difficult to provide health and education 'up front' as the County and the National Health Service do not operate this way.
- 17) Danes Leisure Camp as a leisure pool is poor.
- 18) The loss of school playing fields and sports facilities have been a backward step.
- 19) Most of this is the duty of the local authority so should be a part of any planned development.
- 20) The existing social facilities are not provided to all communities like the Somali community who have no community centre or mosque.

Question 4 (General Comments) continued

- 21) Any planning obligations to provide health, education, leisure facilities to serve new developments must accord with the tests set out in Circular 05/2005.
- 22) *Planning Policy Statement 12 : Local Spatial Planning* (PPS12) advises that Core Strategies be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area. Urgent consideration should be given to the production of a multi-agency Infrastructure Delivery Plan.
- 23) People from Grange Park and Upton go down the motorway to work and shop and the same will happen if the proposed South East urban extension and associated link road to the M1 proceed.
- 24) There is a lack of evidence to back up this objective.
- 25) It is noted with concern that there is no reference to new retail facilities to serve the existing and new communities. Provision should not be restricted to 'local' shops, designed to meet daily rather than weekly or monthly requirements. If no provision is made, then there will be more pressure to increase the size of existing supermarkets. New supermarkets should be permitted in areas of growth, which introduce an appropriate level of competition to the area.
- 26) The involvement of the community in any archaeological activity that may arise as a result of the development would be greatly supported.
- 27) Loss of school playing fields and sports facilities have been a backward move in the past. Continued infrastructure should be ongoing.

Question 5

Question - Do you support Objective 4? 'To direct retail development to the most appropriate locations that support regeneration of the town centres'

Summary of Key Points Raised in the Responses:

Support

- 1) The principle not to allow out of town retail shopping centres is right.
- 2) All town centres included within the vision need regeneration but in particular Northampton.
- 3) Town centre regeneration would support job growth.
- 4) The objective is supported provided this is achieved quickly and without detriment to the amenities of the areas.
- 5) The objective is supported provided that sufficient public transport and parking is provided to serve retail development. Existing congestion on the road network also needs to be addressed.
- 6) The regeneration of town centres is important and churches are an important feature of town centre life and need a healthy urban environment in which to fulfil their role. Town centre facilities should include the improvement of worship centres for all faith groups.
- 7) Objective 4 is particularly important in Northamptonshire where residents look towards retail experiences outside the County. Town Centres will only be regenerated effectively if they provide a pleasant, safe retail and leisure experience.
- 8) It will be critical to ensure that town centres also support, in addition to retail, wider commercial leisure and social facilities and achieve long term jobs growth.
- 9) Town centre retail development is a key criterion for students in their choice of University because many students work part time in localised retail outlets.
- 10) Regeneration of Towcester, Brackley and Daventry is supported. Increasing population in these towns would sustain a better range of shops and dissuade people from travelling to Northampton.
- 11) Regeneration could address negative aspects of Northampton Town Centre, such as drunks and rowdy youths, so that shoppers feel safe.

Question 5 (Support) continued

- 12) This policy is good for social cohesion.
- 13) Support on the proviso that efforts are made to attract new business to the area.
- 14) Support on the proviso that historic character is retained.
- 15) Support on the proviso that retail in mixed use schemes is of an appropriate scale for its location and should not conflict with or undermine the regeneration objectives for the town centre.

Object

- 1) It creates an imbalanced society if local people have to travel into an already congested town to buy their essentials.
- 2) The reality is that the general public travel out of town to shop. Sustainable modes of transport are entirely unsuitable for people who wish to carry home a week's groceries from the town.
- 3) It is deluded to think that 18,000 new houses to the south of Northampton, just north of the motorway, they would be encouraged to forsake their cars and prefer to struggle through all weather conditions into Northampton, rather than driving just 20 minutes to Milton Keynes, which has excellent access for shoppers.
- 4) To retain the spending in Northamptonshire and when homes will be built on the periphery of Northampton, it is inevitable that new out of town shopping centres will be required outside the old town.
- 5) A new road to the M1 would improve access to the M1 but clearly would not help to regenerate Northampton town centre.
- 6) New housing development on the edge of towns will not strengthen town centres.
- 7) Disagree that all shopping facilities should be located in the town centre and district centres.
- 8) Further detail is required on the definition of what is '*most appropriate*' as this is too vague.
- 9) Profit led development cannot be directed to where it doesn't want to go. Retailers should be free to find their own market place.

Question 5 (Object) continued

- 10) Some retail development, such as garden centres, builder's merchants and DIY stores, are not suited to town centres. Furthermore, the advent of internet and phones sales means that a growing number of businesses do not need high street shops.
- 11) The Council have failed in the past, ruined towns and lost businesses, and shouldn't be allowed to spend more money to get business back.
- 12) This policy places unjustified restrictions on A2 uses [e.g. banks, estate agents], and therefore works against the Government's and Council's objective of promoting vitality and viability in town centres. Banks are the subject of high levels of visitation and footfall (often higher than A1 uses [shops] and present interesting and varied visual aspects to street frontages.
- 13) IKEA has been turned down, the football club has been turned down, yet the town centre continues to decline. Depriving outsiders does not help the town centre – people just travel to Milton Keynes instead.
- 14) Traditional town centre sites cannot provide the retail facilities suitable for a wide range of traders. Whilst re-development of Northampton Town Centre would be desirable, the continual failure to do so satisfactorily is a poor portent.
- 15) Northampton Town Centre is physically incapable of coping with large numbers of people because of its old market town design.
- 16) This objective is too inflexible and should be amended to recognise that in some instances, retail development may be appropriately located in non-town centre locations. *Planning Policy Statement 6: Planning for Town Centres* emphasises the importance of local shopping centres to meet people's day-to-day needs and should be the focus for more accessible local services, such as health centres and other small scale community facilities.
- 17) National planning policies already provide a strong 'town centre first' focus without precluding non-town centre development. The retail tests that non-town centre development must satisfy, aim to protect town centre development and provided development satisfies these tests, it should not prejudice proposals to deliver a step change in retail offer in the city centre.
- 18) There is no short term availability for retail development in the city centre and this policy would stifle economic development in the short term. The Core Strategy should look at adopting a complementary big box bulky goods strategy where no opportunities can be identified in the city centre.

Question 5 (Object) continued

- 19) The scale of growth proposed by the *Emergent Joint Core Strategy* necessitates growth of new retail outside existing town centres. This is supported by the *East Midlands Regional Plan*, which requires the identification of an appropriate number of existing and possible and future District Centres.
- 20) Town centres and villages outside Northampton may suffer due to a focus on development within Northampton.
- 21) The Taylor Report (2008) recommends adoption of a model of 'clustered communities' joined by good connectivity. This approach is recognised as creating and delivering attractive, vibrant sustainable new neighbourhoods and community extensions with their own mix of housing, services and employment space, green space and community facilities. Accordingly, not all retail development can be located in the town centres.

General Comments

- 1) Brackley town is in urgent need of retail development.
- 2) The objective should encourage the high quality independent retail sector which assists in the reuse of historic buildings.
- 3) The objective is supported provided it does not prevent Daventry from significantly improving its retail offer wider than its defined catchment area.
- 4) More retail parks are opposed.
- 5) The objective could be rephrased to ensure the existing areas of non-town centre retail such as Sixfields are not being disadvantaged.
- 6) All of the retail schemes need to be accessible, including by car and therefore the need for appropriate infrastructure, particularly transport is an essential element that must be provided to ensure any retail development, including those in town centres, succeeds.
- 7) Town Centre regeneration should not be at the expense of helping villages to be more sustainable.
- 8) It will never be likely that, for example, John Lewis would open in Northampton when they have flagship stores in Leicester and Milton Keynes.

Question 5 (General Comments) continued

- 9) Development of Weedon Depot is supported. In particular, the West Northamptonshire Retail Study published in March 2009 came to the view that a factory outlet centre could be a possible use of the site.
- 10) Any development of Weedon Depot would be detrimental to Daventry Town. The property should be developed for a varied number of uses that would be a positive contribution to the county and nationwide, but development should not affect retail outlets in surrounding rural hinterlands.
- 11) The central towns plans [note: presumably Northampton and Daventry AAP] should go ahead to encourage new business and accompanying benefits such as jobs, finance and homes.
- 12) Whilst town centres need regeneration, the suburbs need shops too.
- 13) Northampton town centre is long overdue for major improvements, including cleaning up the streets and pavements, redeveloping the bus station and removing the casinos, nightclubs and pound shops.
- 14) Grosvenor Centre car park does not give a good image of Northampton and should be redeveloped.
- 15) Bypasses are essential for Towcester and Daventry if these towns are going to be expanded.
- 16) Care must be taken not to spoil the appearance of Georgian/Regency areas in Towcester and Brackley. This has already happened in Daventry.
- 17) The effect of public transport on shopping habits needs to be considered. People will not want to carry loads of bulky goods on buses for example. Perhaps a Local Authority sponsored delivery service could be considered.
- 18) Priority needs to be given to making the centre attractive to good and not cheap shops. It does not need a “big bang” approach such as that in the Area Action Plan. Instead a gradual process through good planning decisions and commitment will stand a better chance and more likely to succeed.
- 19) Products should be local and/or niche shopping should be encouraged in town centres.
- 20) Empty shops should be filled before new ones are built as town centres are suffering.

Question 5 (General Comments) continued

- 21) This policy may be feasible in Northampton but it is difficult to see how it can be done elsewhere.
 - 22) This objective fails to recognise the potential Brackley has to serve a wider rural catchment, underestimates its capacity as a future science centre and therefore its capacity for additional growth.
 - 23) A new town would allow centralised retail to occur in a properly controlled way.
 - 24) Would like to support local businesses but cannot at present as the roads are poor and parking insufficient.
 - 25) Retail development needs to be planned strategically.
 - 26) Northampton needs to reintegrate with surrounding areas. Parking fees are too high and should be abolished. This could be replaced with a 1p in the £1 to business rates as compensation as businesses are the beneficiaries.
 - 27) Northampton Town Centre is embarrassing. The market square is great, but the shops are limited and there is no variety.
 - 28) Low start rents and business rates as well as a limit on the growth of similar businesses are needed to support regeneration.
 - 29) We need a balance between retail, leisure and living spaces in town centres.
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Question 6

Question – Do you support Objective 5? ‘To complete, enhance and safeguard the connections in the existing strategic green infrastructure network, extending these into new urban extensions and creating connections between neighbourhoods’.

Summary of Key Points Raised in the Responses:

Support

- 1) The objective is supported. A green infrastructure network which can be used for sustainable travel by walking and cycling.
- 2) Organisations such as the Nene Valley Regional Park and the Northamptonshire Wildlife Trust should continue to be supported.
- 3) The objective is supported as the existing green infrastructure network is poor and requires much more investment.
- 4) The objective is important both socially and environmentally, and that positive behaviour patterns and pride in the surrounding and the County are likely to be encouraged by this approach.
- 5) The objective supports residents’ future quality of life.
- 6) There must be protection of green areas and connections to existing town centres and communities.
- 7) Green infrastructure should be a priority.
- 8) Support connections between neighbourhoods as they result in the regeneration of existing village communities.
- 9) Green infrastructure will create beautiful villages and is good for the environment and climate change.
- 10) The old and new linked together will reflect the growing community.
- 11) The Canals form a marvellous linear park these must be preserved and enhanced as a major green corridor.
- 12) We must plan now for when it will be too expensive for many to use the motorcar. Green walkways and cycle ways provide an environmentally friendly alternative.
- 13) The provision of networks linking communities is essential and is currently lacking [in Northampton] and is needed now and for the future.

Question 6 (Support) continued

- 14) The objective is essential for regeneration.
- 15) An essential part of any urban extension.

Object

- 1) It is considered that the term "strategic green infrastructure" is planning jargon and not suitable for communicating this objective.
- 2) The objective only supports a green infrastructure network to allow for urban sprawl to subsume 15 villages.
- 3) Object to the use of the words 'green infrastructure network' which "dumbs down" the terms 'countryside' and 'landscape'.
- 4) A clearer definition of sustainable development principles is required.
- 5) The objective is contradictory as building on greenfield land will not safeguard the green infrastructure network.
- 6) The objective is not specific enough.
- 7) Not enough detail as to how it will be achieved.
- 8) It is difficult to understand how any green infrastructure can be safeguarded and enhanced by concreting over the countryside in order to build 18,000 new houses and the required infrastructure.
- 9) Green infrastructure is costly and largely unnecessary. Too much interference is not to be encouraged.
- 10) There is concern regarding the need to provide safe and secure communities and numerous inter-settlement connections may work against this.
- 11) Green infrastructure does not work, even in rural areas as the use of public or green transport is based on economic viability.
- 12) Connections with neighbours encourage crime and antisocial behaviour.
- 13) Villages should be independent.
- 14) More consideration should be given to sensitivity and green infrastructure studies to direct development away from areas that are particularly sensitive.

Question 6 (Object) continued

- 15) There is already a network of bridleways and footpaths used for recreational activities. We do not want formal concrete cycling lanes as they attract crime.
- 16) Green managed corridors do not make up for a loss of natural countryside.
- 17) The minority who will support this objective are insignificant.
- 18) Funds should be deployed in greening existing infrastructure rather than creating more unnecessary infrastructure.

General Comments

- 1) Agree with the objectives, but not the mechanisms to achieve them.
- 2) The Infrastructure Delivery Plan will need to set out what green infrastructure will be delivered, when it will be delivered and by whom and when.
- 3) The M1 corridor along the Nene Valley must be improved as part of the green infrastructure network.
- 4) Is it really feasible to create a green infrastructure route to Banbury, Towcester and Milton Keynes?
- 5) Should include the restoration of the Grand Union Canal which connects Buckingham, Thornborough, Deanshanger, Old Stratford and Cosgrove to Milton Keynes.
- 6) There is concern that the recession will affect the ability to deliver the infrastructure needed to make good communities.
- 7) Whilst supporting the green network objective there is a high land requirement of housing which may impinge on the provision of green networks.
- 8) Care must be taken to ensure that new 'green' connections are sensitive to the areas in which they are located.
- 9) Major consideration needs to be given to safe, secure cycle networks linking villages to Brackley.
- 10) Historic sites and landscapes can be part of the green infrastructure networks.
- 11) Countryside between towns must be maintained.

Question 6 (General Comments) continued

- 12) There should be more focus on the Eastern District of Northampton to enhance and safeguard the connections in the existing green infrastructure and create better environments and neighbourhoods.
 - 13) There should be further mention of initiatives such as the inclusion/development of Pocket Parks.
 - 14) Open spaces and leisure space needs to be part of new development rather than on the extremities.
 - 15) Links between the areas identified in the document for green infrastructure and other areas need to link to Northampton town, transport and housing.
 - 16) Support the Greenbelt concept. I do not believe that those who have proposed these plans understand Greenbelt.
 - 17) Rural and urban cycle ways look easy to provide but they need to keep a rural character and not be hedged by fences and paths.
 - 18) This objective should not be limited to connections only.
 - 19) South Northamptonshire lacks a Country Park facility.
 - 20) All rural communities need to become more sustainable places to live.
 - 21) The green infrastructure network should also include private green spaces such as golf courses as well as public spaces.
-

Question 7

Question – Do you support Objective 6? ‘To encourage key rural communities to become more sustainable places to live and work’.

Summary of Key Points Raised in the Responses:

Support

- 1) The objective is supported as without development and investment key rural communities will not prosper.
- 2) The objective allows for Parishes to develop sustainable community energy, food and transport.
- 3) The objective will reduce the need for all residents to travel to work from the rural areas.
- 4) Making rural communities more sustainable economically tends to make them more balanced overall.
- 5) Welcome the reference to support and develop the area’s existing market towns as it is important that these assets are supported in providing services to the wider rural hinterland.
- 6) The rural environment is a ‘key’ benefit and attractive feature of Northamptonshire and must be maintained.
- 7) Objective 6 should assist communities to remain as viable and desirable places to live.
- 8) There could be some very useful economic gains if people could work locally i.e. spending at lunchtime using shops and other facilities.
- 9) Sustainable Urban Extensions (SUEs) can contribute to this objective through effective linkages, for example providing employment opportunities serving wider rural areas.

Object

- 1) Rural communities are best sustained through the redevelopment of brownfield sites within village confines, this will revitalise schools, post offices, churches and social clubs and strategic infrastructure will not be required as this type of expansion will be distributed across the whole area.

Question 7 (Object) continued

- 2) Rural communities can best be sustained by adding small to medium sized extensions to include affordable housing. This will reinvigorate village services and facilities and will not require massive infrastructure improvement. Filling in spaces between communities will undermine sustainability, result in loss of village identity, enforced urbanisation of village communities, social stress and congested road work. .
- 3) There is not enough information on the consultation document. What are the 'key rural communities'. They should have a defined minimum threshold of facilities to qualify.
- 4) The objective needs to be better defined as it is unclear if 'Key rural communities' relates to Towcester, Daventry and Brackley.
- 5) Not supported as many rural communities have already lost employment sites as well as local facilities/services.
- 6) This objective should not differentiate between rural communities.
- 7) The answer is to improve public transport connections than provide further significant rural development.

General Comments

- 1) Better Information Technology networks are required for rural areas.
- 2) *'I agree with the objective but only where rural communities want to grow – it must be their choice'*.
- 3) Sustainable farming should be supported.
- 4) Brackley was a key retail centre until major road links were established to the A43 and the rail connection was lost.
- 5) Rural communities can best be sustained by adding small to medium extensions to each community to provide affordable housing and thus reinvigorate local schools, shops and other facilities. This approach will not require massive new infrastructure improvements as the burden of development is spread across the County.
- 6) Large scale development at villages would be inconsistent with the *Regional Spatial Strategy (RSS)*.
- 7) Rather than encouraging rural communities to be more sustainable places the words 'and facilitate' should be added after 'encourage'.

Question 7 (General Comments) continued

- 8) It is incorrect to state that only a small percentage of residents live in the rural areas. In Daventry District 68% live in the rural areas, whilst this rises to 75% in South Northants.
- 9) Limited growth (including the scale of employment) of rural communities to provide for local needs should be accommodated within this objective.
- 10) The sustainable policy approach to rural communities should not result in a destruction of local character and community spirit.
- 11) People do not need to be encouraged to live and work in rural areas.
- 12) Initiatives that can help the enhancement of village environments and improve their sustainability should be added.
- 13) Facilities must be built to high design standard, as reflected in objective 16.
- 14) Making surrounding places sustainable will encourage growth/investment within Northampton.
- 15) All rural communities should be encouraged to become more sustainable places.
- 16) Kilsby, Crick are highly sustainable villages which need more housing to redress the imbalance between job opportunities, especially at Daventry International Rail Freight Terminal (DIRFT) and housing availability.

Question 8

Question – Do you support Objective 7? ‘To ensure future development is based upon sustainable development principles’.

Summary of Key Points Raised in the Responses:

Support

- 1) In light of climate change all the sustainable measures that can be incorporated e.g. solar panels, Sustainable urban Drainage Systems (SuDS), wind generators, recycling of waste water should be included in development.
- 2) Sustainable development should be established as a principle which underlines the whole plan.
- 3) Development which is not sustainable is a waste of time and money.
- 4) A dramatic extension and improvement of all modes of transport well in advance of development of housing, whilst still having due regard to the environment and achieving reduction in travel needs is required.
- 5) Regulations should be put in place to ensure the use solar panels and the gathering of power and rain water.
- 6) Any development that includes infrastructure must be sustainable.
- 7) This is common sense.
- 8) Every effort should be taken to reduce Carbon Dioxide (CO²) emissions.
- 9) Should use agreed industry standards where appropriate to assess the sustainability of buildings etc.
- 10) The future must be considered when present commodities are no longer available so future generations have a good quality of life.
- 11) Sustainable development principles promote less travel and damage to the environment.
- 12) The focus of development around the four towns is a fundamental principle to secure sustainable development.
- 13) Support small scale development in villages to make them more sustainable.
- 14) Must be real and not just “marketing” talk.

Question 8 continued

Object

- 1) There is no such thing as sustainable development.
- 2) The consideration of sustainable development should go further.
- 3) Brackley is dependent on bus services and the private car to reach other towns for employment and services, major road improvements are needed to serve Brackley.
- 4) The term 'sustainable' ill-defined and maligned word.
- 5) The best modal shift has only been an insignificant 5%, if planners insist on pretending that we can reduce car movements from 7% down to 3.5% we are doomed to insurmountable traffic problems in the future. The approach to modal shift is bound to fail.
- 6) Reducing the use of the car would result in constraining development.
- 7) Sustainable urban Drainage Systems (SuDS) can not cope with the effects of climate change and will increase pollution.
- 8) The destruction of top grade agricultural land will compromise the ability of future generations to meet their needs and thus cannot be sustainable development.
- 9) Development should be constrained so that it will not have an adverse impact on existing communities.
- 10) Sustainable development principles have not been financially quantified.
- 11) Development requires gas from Russia, electricity from France, new reservoirs for water and imported food from overseas; this is not sustainable.
- 12) Concreting over the countryside is not sustainable.
- 13) It is more sustainable to develop brownfield sites rather than the countryside.
- 14) Sustainable means infrastructure first.
- 15) The strategy is not sustainable; there is only one public transport scheme.
- 16) Sustainable development is small outlets not huge ugly blocks of white warehousing spoiling our view.

Question 8 (Object) continued

- 17) Need to make existing buildings more sustainable.
- 18) The employment is not sustainable due to a restructuring of the British economy and the recession.
- 19) Sustainable should mean control of development to work with the existing conditions population and physical features of an area.
- 20) This strategy destroys the greenbelt.
- 21) This can only be achieved by concentrating development close to the centre of Northampton.
- 22) This is too expensive and developers can not afford it and so the housing will cost more.
- 23) Should build a new town.
- 24) Development at Daventry is not sustainable.
- 25) Building new roads is contradictory to this objective.
- 26) There is no proof that the “vision” is sustainable.
- 27) Should refurbish the eastern District first before resorting to cheap and dirty solutions, and implement a complete range of carbon-neutral development.
- 28) We should only allow organic growth.
- 29) This objective is not locally specific.
- 30) How can building houses without garages be sustainable?
- 31) Don't believe developers' claims that their development is sustainable.
- 32) How can we be assured that regulation will be stringent enough?

General Comments

- 1) A more focused definition of sustainable development principles should be included.
- 2) 'Sustainable development principles' should be stated for ease of reference.
- 3) Sustainable means different things in different places.

Question 8 (General Comments) continued

- 4) Protection and enhancement of historic environment is integral to sustainable development.
 - 5) The Towcester bypass proposals in the Strategy are “admirable” but something needs to be done to mitigate the effect on Old Stratford roundabout.
 - 6) Need to understand what a sustainable community should contain.
 - 7) Need to be clear about how the Sustainability Appraisal has been used to determine the preferred options.
 - 8) Employment should be located where it will help contribute towards sustainable development.
 - 9) The pattern of land-use is paramount to achieving a sustainable plan.
 - 10) Northampton Highgate (Land South of the M1) is a more sustainable location for development.
 - 11) Should involve parishes more to help improve green footprints.
 - 12) All communities should be sustainable, not just rural areas.
 - 13) Should learn lessons from older developments and not compromise on design.
-

Question 9

Question – Do you support Objective 8? To protect and enhance the built and cultural assets of West Northamptonshire, the character of its towns and settlements and foster the development of West Northamptonshire as a destination for heritage and cultural tourism’.

Summary of Key Points Raised in the Responses:

Support

- 1) Support this objective without change.
- 2) Support this objective otherwise the important heritage and cultural assets and identity will be lost.
- 3) Support the need to protect and enhance the built cultural assets and would add leisure, retail and wildlife/countryside as key draws for tourism.
- 4) Support the objective, provided that heritage and tourist developments are in scale with the landscape.
- 5) Support the objective. Brackley’s built heritage is excellent, but its cultural offer needs major improvement e.g. theatre, arts and restaurants.
- 6) Building on the area’s cultural assets is important in supporting the wider environment but also offers economic development opportunities with potential to focus on the area’s leather heritage.
- 7) The objective is supported and it is emphasised that the existing character and historic assets of Northampton and surrounding towns should be protected and incorporated into any schemes and new development both within the towns and surrounding/abutting areas should be designed to reflect the current heritage.
- 8) Support this objective, but not at the expense of concreting over vast areas of this beautiful part of England. Northampton and the surrounding areas have absorbed enough expansion over the years.
- 9) Objective is supported provided ‘*settlements*’ includes all existing hamlets and villages.
- 10) Protection of green belt areas and heritage is vital to the identity of the area.

Question 9 (Support) continued

- 11) Support this objective as it fosters the development of West Northamptonshire as a destination for heritage and cultural tourism. The recreational potential of the waterways of the County will be protected, in particular, the Buckingham and Old Stratford Arms of the Grand Union canal.
- 12) Support this objective as too many cultural and heritage assets have been lost already.
- 13) Communities evolve. This objective is a way of guiding that evolution into the future.
- 14) The tourism potential of West and South Northamptonshire has scope for substantial development and the creation of associated jobs.
- 15) Heritage and culture are important for the people living now and for future generations. They make people proud of living in their area and are assets for attracting employment and new residents.
- 16) Support, but the only way to protect historic market towns is to stop expansion, have infill/brown field development and encourage new business to bring employment to these areas.
- 17) Northamptonshire has many cultural sites.
- 18) People should enjoy and learn from the visible history of the area.
- 19) Support, although this should not preclude innovative design where appropriate.
- 20) Landscape, especially historic parkland, is particularly important.

Object

- 1) Surrounding towns and villages with “urban sprawl” will not achieve the protection and enhancement of the built and cultural assets of Northamptonshire.
- 2) This objective is of no importance.
- 3) The plans contained within the *Emergent Joint Core Strategy* will destroy the area’s heritage.
- 4) The track record of the Council and West Northamptonshire Development Corporation has been appalling and the respondent has no confidence in their ability to put this objective into practice.

Question 9 (Object) continued

- 5) This is not a priority and that money could be better spent elsewhere.
- 6) Protection/enhancement should be extended to all the heritage of Northamptonshire, instead of deciding some areas are expendable.
- 7) The character of West Northamptonshire has been destroyed over the last few years, and is therefore not in need of protection/enhancement.
- 8) Tourism is not sustainable or needed.
- 9) No detailed plans, costing or evidence have been provided to support this objective.
- 10) With the exception of Towcester, the other characterless towns are hardly worthwhile heritage and cultural tourism destinations.

General Comments

- 1) The proposed growth must not destroy the character of places. Archaeological sites should be protected. Several archaeological assets may be lost as a consequence of the proposed development.
- 2) Churches are key built and cultural assets, and church yards are also an important quiet space and wildlife resource.
- 3) Protection and enhancement of the historic environment is integral to sustainable development and that to be consistent with draft *PPS15: Planning for the Historic Environment*, that distinctiveness needs to be rooted in local history.
- 4) Northamptonshire has not fulfilled its potential as a tourist destination.
- 5) Weedon Depot must be recognised as an important tourism destination that could contribute positively to West Northamptonshire's cultural and leisure offer.
- 6) This objective must be carried out in a sensible way, with affordable housing tying in with the buildings of the area. This can be done with great thought and agreement with all communities involved for generations to come.
- 7) Preservation is worthwhile, but not to the point where assets are completely unchangeable.
- 8) Prime farm land should be preserved for its food production value.

Question 9 (General Comments) continued

- 9) New development needs to be a design and cultural asset for future generations to revere.
 - 10) Consider Lamport-Northampton Railway, The Farm Shop, New Woods and Windhover as centres of local tourism.
 - 11) Where cultural and built assets are identified in close proximity to potential development sites, the degree to which these assets would require protection should be considered in conjunction with the importance of the proposed development.
 - 12) Brackley has attractive buildings and a communications and brewing heritage which should be capitalised on.
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Question 10

Question – Do you support Objective 9? ‘To contribute towards raising education achievement and the skills base of our communities through supporting schools, colleges and the University in their provision and development’.

Summary of Key Points Raised in the Responses:

Support

- 1) The objective is supported on the condition that investment in further education and provision of student accommodation is met.
- 2) The objective will ensure a trained and vibrant workforce that will sustain existing commercial and industrial development.
- 3) The development of the University of Northampton is strongly supported and the development of good schools, including faith based education, for all children.
- 4) The objective should not be achieved through the building of massive housing estates on greenfield land.
- 5) Raising of academic standards and achievements will permeate the whole social and economic structure of Northampton to enhance its identity and reputation as an aspirational place to live and work.
- 6) This objective is essential for consistency with the overall 2026 Vision.
- 7) This objective is socially and economically desirable.
- 8) This objective is fundamental to achieving the elevation of this part of Northamptonshire.
- 9) Raising educational standards would help young people gain the skills needed to enter the world wide job market.
- 10) This objective is supported as development on the scale proposed would ensure the enhancement of educational facilities would be provided not only to cater for the additional population but also to ensure current standards are raised.
- 11) Accessibility to educational needs especially primary schools is paramount. Old Stratford primary school is oversubscribed meaning that siblings of attendees are excluded to the nearest next available village school.

Question 10 (Support) continued

- 12) It is important to support an enterprising culture and to raise the aspirations for the area. The Joint Core Strategy should consider the need to specifically promote Science Technology, Engineering and Maths (STEM) activities in line with local and national policy drivers through engagement with communities and schools.
- 13) Educational achievement is part of building for the future.
- 14) Making Northampton a top University town would be positive.
- 15) The development of the northern area around the university would facilitate the vision and create high academic and vocational educational attainment.
- 16) The University could help to regenerate the town centre.
- 17) Schools are already oversubscribed. The objective is supported, providing this can be addressed first.
- 18) Supported, although funding sources are unclear.
- 19) Must encourage adult / life long learning.
- 20) Support the principal, but improved education has nothing to do with the planned expansion of West Northamptonshire. Some of the best schools, well educated people are in small countryside towns.
- 21) Higher standards of education will encourage increased employment levels.
- 22) Education provision is an essential aspect of planning for major urban extensions. Growth to the south east of Northampton is supported and would be closely linked with the Caroline Chisholm School.
- 23) Additional housing in villages would support the smaller schools and maintain their vitality.
- 24) Standards of education at current facilities must be increased.
- 25) Develop links with existing and incoming businesses to secure enhanced skills and relationships between land use and further employment development.
- 26) Regional and international competitiveness is reliant on raising the quality of labour force.

Question 10 (Support) continued

- 27) The skills of the semi-skilled and skilled manual workforce should be considered to ensure the needs of the entire community are served by the economic development strategy.
- 28) University should build relationships with the Community Landscape Archaeology Survey Project.
- 29) The proposals will discourage the migration of young people abroad due to lack of University places and a shortage of jobs.

Object

- 1) The objective will require further investment in education, however the plan makes no indication of how this investment will be made.
- 2) Students will be driven away by the unfeasible growth planned.
- 3) Raising educational achievement and skills base can be fulfilled without a growth agenda which will have the opposite effect.
- 4) Objective 9 should be a Government function and should not be devolved down to local funding provision.
- 5) The plan does not support this objective as lack of infrastructure to serve development will deter students.
- 6) It is not clear how the plan will achieve this.
- 7) But where will the jobs come from for our young people.
- 8) A fine objective, but without increasing the population and ruining the environment.
- 9) Simply providing schools and aspirational statements about a University Arc is no guarantee of attainment.
- 10) Core Joint Strategy cannot claim these objectives as the Council does not form part of the funding stream that will support education growth.
- 11) Deprived areas (i.e. Eastern District) need to be regenerated before rural areas are developed.
- 12) The objective is a given and so it is not an objective.

Question 10 continued

General Comments

- 1) Education provision at secondary and further education level needs further consideration in the light of development proposals in Brackley.
- 2) The objective should have a stronger focus for West Northamptonshire and be more locally specific.
- 3) The objective is not supported in any part of the development proposals.
- 4) Skills base must be improved.
- 5) This is an essential prerequisite to other objectives.
- 6) Brackley should not be overlooked in term of its ability to serve a wider rural catchment.
- 7) Education is already well funded but monies are not well spent.
- 8) Moulton College alienates people and is not part of the community.
- 9) Northampton University and Moulton College are growing and popular.
- 10) Consideration should be given to creating an outreach centre for the University in Brackley.
- 11) Good schools are already over subscribed.
- 12) Planning must include education from the start and not provided after the houses have been built.
- 13) The evidence base is mentioned although there is a lack of evidence to support this objective. Plan is therefore not considered sound under the requirements Planning Policy Statement (PPS) 12 *Local Spatial Planning*.
- 14) Travel to local university by public transport too difficult for day students without cars.
- 15) We should collaborate with other universities at Nottingham, Leicester, Loughborough and Derby to ensure a wide range of courses are available.
- 16) The objective should support careful expansion of Northampton town principally to the north, in a wide circular arc with a major focus on a new education and business hub connecting to the development area in the Northampton North option.

Question 10 (General Comments) continued

- 17) Educational centres of excellence usually attract inward investment by their own efforts and achievement because local Authorities have limited cash and particularly in the current economic downturn. How with the Joint Core Strategy contribute to this objective?
- 18) Educational achievement is already catered for in Weedon Bec Parish through the expansion and provision of existing establishments and their ability to adapt to increasing needs, as they have done over the last 40/50 years. Young people have an increased role to play in community development and enhancement by having this taught to them in schools and making them do more community work/projects, that this benefits them and teaches them the importance of involvement.
- 19) The youth of Northampton have been let down by local councils. More facilities are required now.
- 20) Northamptonshire County Council has sold off playing fields and old school sites instead of creating community education hubs for adults.
- 21) Workshops should be built to develop skills.
- 22) There is a shortage of teachers to teach skills.
- 23) Development of cycle lanes from the north of the town/university would help address transport issues and channel people to the town centre.
- 24) Funding for education per capita is significantly lower than in most of the contiguous counties. Funding via Central government must address this shortfall.
- 25) Skills training should be offered to those who are not academic.
- 26) Education achievement is linked to good teachers. Investment should be toward teacher training rather than new facilities.
- 27) Genuine academic and practical skills programmes should be pursued, not low quality, spurious in irrelevant disciplines.
- 28) Support the reinstatement of the technology/learning quarter (dropped since issues and options report).
- 29) Supported providing this objective does not result in community tax increases.
- 30) Infrastructure and transport links around existing educational facilities need improvement.

Question 10 (General Comments) continued

- 31) Education has nothing to do with the development plan.
- 32) More must be done to encourage young people to aim higher.

Question 11

Question – Do you support Objective 10? ‘To protect the environment by minimising the risk of flooding and the effects of climate change and facilitating improvements in air quality’.

Summary of Key Points Raised in the Responses:

Support

- 1) Essential to protect the built environment from flooding.
- 2) Climate change affects all of areas of the environment.
- 3) No one would disagree with this objective we all need safe places to live and work.
- 4) Need to ensure that we keep a healthy air quality for future generations to come and live here.
- 5) Reducing levels of pollution will increase our quality of life.
- 6) Existing measures are underfunded.
- 7) Sustainable urban Drainage Systems (SuDS) in new developments will help.
- 8) Development in the future should be on radically improved environmental principles.
- 9) Recent flooding has shown how major transport links and railways can be closed by flooding. Every effort should be made to ensure that new developments cannot be flooded and where possible existing sites can be improved or rebuilt.
- 10) Several proposed areas for development need to be more seriously investigated and probably rejected to conform to this supported objective.
- 11) Towcester needs to improve its air quality by the proposed by-pass taking all Heavy Goods Vehicles (HGVs) away from the centre of the town and de-trunking the A5.
- 12) This objective should mean building high-rise development in the town centre to minimise car use.
- 13) Air quality is significantly more important in densely populated areas such as towns and cities and is less of an issue in more rural environments.

Question 11 (Support) continued

- 14) Flood plain land should be designated for parks/ open space/ community space/ set aside for nature/used to get cycle paths and footpaths through to town or to join new developments.
- 15) Flooding is a major concern and issue for the villages of the Upper Nene Regions and thus mitigation and additional flood alleviation methods, other than standard methods, must be employed to prevent wide spread flooding.

Object

- 1) This objective is unachievable with the proposed growth. Flood risk and air pollution will be increased.
- 2) Flood plains should not be used for development.
- 3) Climate change is unpreventable.
- 4) The science supporting climate change is unproven.
- 5) Climate change is natural. Many of us know how bad air quality was prior to 1960 - is present air quality is as bad as it is painted?
- 6) Until climate change is understood all development must stop.
- 7) The objective needs to be better articulated.
- 8) Needs explicit reference to mitigating climate change, minimising use of non-renewable resources, minimising waste creation and developing economically valuable skills.
- 9) The current flood prevention is inadequate and the Borough Council does not have sufficient funds to maintain the defences.
- 10) No development should be permitted in flood plains no matter how good the flood defences are.
- 11) Previous policies for building on flood plains have contributed to worsening flooding locally.
- 12) Incorrect data is being used for flood risk modelling.
- 13) 60,000 new dwellings will see an additional 100,000 vehicles on the road that will result in further air pollution.
- 14) Building a new four lane link to the M1 will increase air, noise and light pollution.

Question 11 (Object) continued

- 15) Stop building on flood plains and plant more trees.
- 16) Flood prevention has not been sufficiently considered in the plan and new development will worsen air pollution.
- 17) Our local systems would cope better with smaller developments located on the periphery of developments.
- 18) Excessive requirements would lead to investment decisions being made elsewhere. Developers should only be required to provide for infrastructure that directly relates to their own developments.
- 19) A more overt approach is required based on minimising greenhouse gasses and an adaption strategy- especially in respect of how flora and fauna can be assisted to adapt.
- 20) The proposal must mitigate adverse effects of the development on the environment and improve the overall impact.
- 21) Should include explicit reference to: Mitigating Climate Change, Minimising use of non-renewable resources, minimising waste creation and developing economically valuable skills in the above.
- 22) Developing on Green Fields, especially those on hills will make water run off 1000% worse when concreted over.
- 23) The flood plain at Houghton and Billing is under water for many weeks, putting millions of tons of concrete and tarmac across this fragile landscape is nothing short of suicide.
- 24) Brackley is already prone to flooding and new developments would be at high risk of flooding.
- 25) Bugbrooke has flooding problems which must be addressed by future development.
- 26) Do you really believe this is within your remit?

General Comments

- 1) The sea can rise a lot before we disappear.
- 2) The strategy contradicts this by proposing roads and buildings that will adversely affect the environment.
- 3) Would developer contributions cover the cost of massive works to make improvements to the current drainage system?

Question 11 (General Comments) continued

- 4) Poor balancing ponds in the Wootton Fields area has lead to flooding problems.
- 5) English Heritage has produced some information about how the historic environment can respond to the issue of climate change.
- 6) Quinton Village flooded in 2008. The fields around always have surface water.
- 7) Wotton Brook floods when it rains.
- 8) The developments in recent years do not seem to have taken account of the scale of the 1998 floods.
- 9) New developments should be a considerable distance from flood plains as has been proven with the flooding at Upton.
- 10) West Northamptonshire Development Corporation is choosing to ignore past studies that have identified potential flood risks in Swan Valley and beyond.
- 11) We have no faith in the flood risk assessments and zoning that have been carried out in the area.
- 12) The Exception Test should be applied to allow necessary development to occur within Flood Zones 2 or 3.
- 13) We need to collect more water for re-use.
- 14) Floodplains are not obstacles to overcome but are natural areas of land that serve a specific purpose.
- 15) The worst location for growth is Upton, and whilst this is allocated land it should be reviewed to see if it still meets the objectives of the Planning Policy Statement.
- 16) The Joint Planning Unit should be planning for climate change and ensuring that sufficient land is reserved for current and future flood management.
- 17) SuDS (Sustainable urban Drainage Systems) are not the panacea and are best used outside of floodplains to decrease surface water run off and to increase groundwater flow to watercourses, particularly during dry periods.
- 18) North of Northampton is the most desirable location for growth as it is outside of the floodplain.

Question 11 (General Comments) continued

- 19) The Dallington Grange development has undergone rigorous testing, including accounting for climate change, and the results conclude that it will not be at risk of, or give rise elsewhere to flooding.
 - 20) Dodford has experienced severe flooding problems since the building of the Southbrook and Marshes estate.
 - 21) Flood prevention schemes need not only to be built but also maintained.
 - 22) Consideration should also be given to noise and light pollution.
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Question 12

Question – Do you support Objective 11? ‘To involve the community in the decisions about the future planning of West Northamptonshire so they can influence and shape such decisions’.

Summary of Key Points Raised in the Responses:

Support

- 1) Support the objective and expects to be involved and have influence upon decisions regarding the expansion of key rural communities.
- 2) Support on the proviso that Parishes adjacent to West Northamptonshire are also included.
- 3) Support this and welcomes the opportunities to influence decisions as long as the existing residents are listened to as they know the places they live in and they want to protect their existing quality of life.
- 4) Without community support and influence the whole procedure could fail.
- 5) This objective is self-evident and democratic.
- 6) Communities on the ground have better knowledge and understanding and that involvement is best achieved by open meetings between developers, planners and local residents.
- 7) Community involvement builds trust and social inclusion.
- 8) This is the most important part of the strategy.
- 9) It is extremely important that people are well informed especially in the rural areas.
- 10) Must involve community as they have to live with the proposal when completed.
- 11) The community is paying for the improvements mooted through taxes and have a right to be listened to, and taken seriously.
- 12) Failure to listen to communities will give rise to opposition and resentment.

Question 12 (Support) continued

- 13) Community consultation is critical in the plan-making process. It is therefore considered that the Regulations set out in the Town and Country Planning (Local Development) (England) Regulations 2004, together with the requirements set out in the Statements of Community Involvement adopted by the Council's within West Northamptonshire, should be sufficient to involve the community.

Object

- 1) The process of consultation has been such a failure as to be contemptible.
- 2) The respondent feels that present attempts are insufficient and that many of the methods used are inadequate.
- 3) The plan is a poor basis for consultation and the Joint Planning Unit failed to engage with the general public.
- 4) The document is written in planning jargon and difficult for the layperson to fully understand.
- 5) There continues to be, even with the development corporation in place, too many assumptions made that the public know what is happening and are well informed about future plans which on the whole is not the case.
- 6) The West Northamptonshire Joint Planning Unit is not involving the community to any extent before making judgements.
- 7) The *Emergent Joint Core Strategy* has been produced by professionals without any public involvement.
- 8) Council's and the Joint Planning Unit in West Northamptonshire have a history of failing to engage and not listening to the public.
- 9) Participation is a sham, given "*no is not an option*".
- 10) Too much consultation can slow the plan-making process.
- 11) Concerned that community consultation has been too confined in the 6 week consultation period and over the holiday period.
- 12) Workshops and exhibitions that were organised to explain the plans to the public were not made fully accessible to those most affected.
- 13) It is important that all elected members are involved as they believed that some felt the process was happening too quickly and that they had not had sufficient opportunities to fully debate the matters.

Question 12 (Object) continued

- 14) More needs to be done to engage with younger people in the future planning of West Northamptonshire.
- 15) The views of the Parish Council are seldom considered.

General Comments

- 1) Modern media should be utilised, such as television debate, extensive presentations, blanket and frequent mailings, electronic, postal and phone voting.
- 2) More needs to be done to reach the 'silent components' of the communities.
- 3) The option of Northampton South East was not included in the Issues and Options document which were produced in 2007 and only appeared at the end of July in the *Emergent Joint Core Strategy* document.
- 4) The strategy should also ensure that growth benefits existing communities and that the strategy should consider the role of the communities in the management and design of multi use facilities.
- 5) Important provided the community is listened to.
- 6) People need to take a broad, positive view and not succumb to NIMBYism.
- 7) The questionnaire for the *Emergent Joint Core Strategy* is too large and therefore daunting for the lay person to complete.
- 8) Too much emphasis has been placed on electronic means of consultation that are inaccessible to many people.
- 9) Consultation needs to be fun and exciting.
- 10) All voices, no matter how large or small, need to be given equal weight.
- 11) Although public participation is worthwhile, it must be recognised that it is not possible to please all members of a community all of the time.
- 12) Technical jargon needs to be removed from consultation documents.
- 13) More resources, funding and staff need to be made available to explain the scheme.
- 14) Suggest the addition of the words "help to" after "can".

Question 12 (General Comments) continued

- 15) Public participation is important but should not be used to question the principle of development; rather it should be used to influence detailed aspects of proposals and to enable community ownership. In particular, the housing numbers proposed have been established through the regional planning system and are therefore beyond question at the level of planning.

Question 13

Question – Do you support Objective 12? ‘To provide quality housing to meet current and future needs of all sectors of our communities’.

Summary of Key Points Raised in the Responses:

Support

- 1) Principal supported. More attention should be given to utilising the existing housing stock before further greenfield development is allowed.
- 2) Objective is socially desirable.
- 3) Objective supported - greater emphasis should be placed on the renovation of existing housing stock, particularly affordable, and improvements to the design quality of new high density housing.
- 4) This objective is vital, however, the current recession should not be used as an excuse to lessen the quality of the built environment.
- 5) Objective is self-evident, what is the point of providing poor quality housing?
- 6) The term “*housing quality*” needs clear definition.
- 7) More intermediate and affordable housing is needed.
- 8) New housing is not meeting the space needs, internally or externally, of occupants, particularly families. Increasing the size/space within dwellings may allow buyers to remain in the property for longer enhancing the community environment.
- 9) Supportive of the objective. All new and regenerated housing built to a high quality finish and design promotes community safety and sustainable communities.
- 10) Secured by Design should be a requirement for all new housing.
- 11) A mix of housing types and a range of tenures will be essential.
- 12) The local community should be given priority to access housing.
- 13) Vacant housing stock should be used before new homes are built.
- 14) Quality design should respond to the landscape context of the site, include green infrastructure, be environmental sustainability, integrate with existing communities, and provide for healthy living with good access to facilities and services.

Question 13 (Support) continued

- 15) Quality housing must be provided although this should not be to the detriment of open space which is part of Northamptonshire's attraction.
- 16) The use of local building materials and architecture should be encouraged to enhance distinctive local identity.
- 17) Quality not quantity.
- 18) Supported but density must not be too high.
- 19) The term 'quality' needs to be defined in the next version of the Core Strategy. Amend objective to read: *'To provide high standards of accommodation and high quality housing to meet...'*
- 20) Objective supported, although further growth should not encourage the area to be an over-spill dormitory which will exacerbate problems with congestion on transport network.
- 21) Dwellings should be built to Lifetime Homes standard.
- 22) Principal accepted. Development should be small scale to enable the increasing population to be absorbed into existing communities.
- 23) Supported, infrastructure must be available.
- 24) This is in accordance with *Planning Policy Statement 3: Housing*, which requires *'a sufficient quantity of housing taking into account need and demand and seeking to improve choice.'*
- 25) Agreed in principal. Objective does not fully consider the role of the 'rural areas', which accounts for the majority of the geographical area, and specifically the rural service centres.
- 26) The objective is supported. The Joint Core Strategy must acknowledge the contribution that Dallington Grange can make to the housing requirement for West Northamptonshire - it should be treated as a commitment within the Joint Core Strategy and policies and proposals should not prejudice the early implementation of this development.
- 27) A detailed Housing Needs Survey must be prepared to identify local need in terms of tenure, type and location.
- 28) Objective supported – must be based on sound socio/economic reasons.
- 29) Objective should be expanded to ensure natural assets are protected and biodiversity and landscape character is enhanced.

Question 13 (Support) continued

- 30) New housing is not meeting the space needs, internal and external, of occupants, particularly families.
- 31) Dwellings must be reasonably priced, regardless of tenure.
- 32) Energy saving, carbon neutral projects and energy efficient housing must be part of the housing quality.
- 33) Affordable housing must be built to a high standard and quality – see Dutch examples.
- 34) The affordable/market housing split should be based on local need and not preordained.

Object

- 1) Only a small percentage is quality housing – much is affordable. This is more about receiving a roof tax income.
- 2) Definition of needs must be clarified.
- 3) Base line information is questioned – no mention of live/work commuting patterns.
- 4) The housing requirement figure is over-inflated and out of date. This should be reviewed before the proposals are advanced.
- 5) The scale of housing being proposed is unacceptable.
- 6) The way West Northamptonshire Joint Planning Unit is proceeding will not allow the objective to be delivered.
- 7) There is enough quality housing already available in West Northamptonshire. Supply currently outstrips demand – the situation was the same before the recession.
- 8) The Country and West Northamptonshire alike cannot sustain this level of housing.
- 9) This is a loaded a question.

General Comments

- 1) Emphasis should be placed on the words “our community” and exclude overspill from London and the South East.

Question 13 (General Comments) continued

- 2) Housing should be provided in the right location not just positioned to meet government targets.
- 3) Quality housing must be proportionate. At present it is decided at the district level, is developer led and local opinion is ignored or dismissed.
- 4) Quality housing is generally unaffordable housing, yet poor quality affordable housing is unacceptable.
- 5) Affordable housing should not be prioritised, rather, provision should be made available for a mix of rented and sale properties.
- 6) Exploring smaller developments across many villages is an option.
- 7) Brownfield land must be developed prior to greenfield, the sequential approach should be used for all developments. Policy should be more robust to encourage this.
- 8) Affordable and intermediate housing must be provided in rural communities to retain younger people in the area.
- 9) Housing should be located near existing facilities.
- 10) There is not a mismatch between local housing and local employment.
- 11) Affordability of housing in rural areas must be addressed.
- 12) Require iconic buildings as part of any planned development.
- 13) Different types of housing should not be integrated but separated instead.
- 14) Where does housing need come from and how is it assessed.
- 15) Little, if any, information provided on the on elderly persons housing needs and the growth of this demographic. More consideration should be given in respect of retirement, sheltered and specialised housing.
- 16) Housing targets beyond 2026 are not included in the Regional Spatial Strategy and should therefore be excluded from the Core Strategy.
- 17) A limit placed on the influx of people to the area would reduce the need to build new housing.
- 18) High density housing can be provided in the Eastern district where infrastructure is already in place to minimise urban sprawl and construction costs.

Question 13 (General Comments) continued

- 19) The post war bulge cohort will be downsizing, a large number of houses will become available for refurbishment, subdivision and rebuilding.
- 20) More funds should be made available to support affordable housing growth.
- 21) Housing should enhance the environment and should not be to its detriment.
- 22) It should not be overlooked that affordability will increase with an overall increase in the housing stock.
- 23) Flats are short-term homes, family homes tend to have a stable influence in the community.
- 24) The principals of equity and affordability must be followed.
- 25) Eastern District's poor housing stock should be addressed.

Question 14

Question – Do you support Objective 13? ‘To foster the regeneration of Northampton to enable it to fulfil a greater role within West Northampton and the Region’.

Summary of Key Points Raised in the Responses:

Support

- 1) Develop Northampton to fulfil its roll and to provide an environment people can be proud of.
- 2) Northampton needs town centre regeneration as many properties are run down.
- 3) As the county town, Northampton should be the urban showpiece and take a greater role in the region.
- 4) Much of the infrastructure exists to make this happen.
- 5) Northampton has become less desirable in recent years and regeneration is needed to counter the attraction of other towns like Milton Keynes.
- 6) Regeneration of Northampton Town Centre would place less demand on development of agricultural/greenfield sites
- 7) Regeneration of Northampton will help other regions economically and socially, as well as provide employment and leisure benefits for other towns in Northamptonshire.
- 8) Regeneration would make Northampton a more sustainable, attractive place to live and attract people away from unsustainable villages.
- 9) This objective could create a thriving hub which we can be proud of and is therefore an admirable aim.
- 10) Given the additional 5,000 homes proposed south of the centre, regeneration would create jobs and services necessary for this new population.
- 11) Northampton is the obvious place to attract new business and employment, and its regeneration will bring prosperity to the area.
- 12) Northampton suffers from a preponderance of gaming and amusement arcades; pound shops, discount stores, clubs and bars and empty retail outlets. Regeneration could create a more diverse, culturally and intellectually stimulating, vibrant county town.

Question 14 (Support) continued

- 13) Northampton's history justifies its importance.
- 14) Redevelopment of the Grosvenor Centre will help achieve regeneration.
- 15) This objective should underpin the spatial distribution of development in Northampton.
- 16) Regeneration will allow Northampton to achieve City status.

Object

- 1) Northampton is not a city and does not need to become one.
- 2) The plan will not achieve this as access to the town centre is poor and people will go elsewhere (e.g. Milton Keynes). Improving access by public transport will not change this.
- 3) As a market town, Northampton's size and layout cannot feasibly be the centre of satellite developments.
- 4) Market demand is for out of town shopping centres. Taxes raised from the development of out of town centres should be directed toward restoring Northampton's historic and market town appeal.
- 5) Northampton at present cannot cope with traffic, noise and floods.
- 6) Objective as written is not clear.
- 7) The Council have ruined Northampton and lost businesses and now want to spend huge amounts of money to get them back. This objective will require money that the Council does not have and can only be raised through increases in Council tax.
- 8) Urban centred facilities are not of interest.
- 9) The objective as it stands does not provide clear policies on how regeneration will be achieved and should not leave this to a later Area Action Plan. In particular, policy needs to clarify the treatment of retail and other supporting services, including banks.
- 10) This will involve the construction of 40,000 homes that are not wanted.
- 11) Existing infrastructure does not support regeneration.
- 12) Oppose if it means more building.
- 13) Milton Keynes should have the City role in the sub region.

Question 14 (Object) continued

- 14) Northampton should not take a greater role in West Northamptonshire or the region.
- 15) Previous development has largely eliminated the characteristics of Northampton as a historic market town. Its rightful place and how this can be achieved must be carefully defined before planning can be considered.
- 16) The *Emergent Joint Core Strategy* does not make regeneration possible.
- 17) Regeneration could destroy the character of Northampton as a market town.
- 18) Northampton cannot reasonably compete with Oxford, Cambridge and Milton Keynes.
- 19) Providing 18,000 homes on the outskirts of Northampton will not stimulate regeneration. People living in these new homes will just travel to Milton Keynes or require out of town shopping centres.
- 20) We are being over regenerated.
- 21) Northampton is currently over-populated and regeneration will exacerbate this.

General Comments

- 1) All areas of Northampton will have to work together to make it happen. We need commitment to one vision by the whole community to be able to make it a vibrant future in transportation, jobs and new homes.
- 2) Those outside Northampton must be able to get into it easily and without substantial financial penalty. Present congestion, traffic lights and parking fees need to be revised or abolished.
- 3) Regeneration should not occur at the expense of other parts of West Northamptonshire.
- 4) Regeneration should focus on vibrancy not size and ensure that existing brownfield and urban sites are used before greenfield sites.
- 5) Regeneration should put some character and history back into Northampton, like it existed 40-50 years ago.
- 6) This objective can be achieved by focussing housing development on the town centre.

Question 14 (General Comments) continued

- 7) Brackley residents do not considered Northampton as their main town. Banbury, Milton Keynes and Oxford are either closer or more accessible.
 - 8) Northampton should be developed as a big business and industrial area.
 - 9) Make the existing town greener without expanding it and develop the River Nene waterfront.
 - 10) Regeneration needs to respect the historic environment, particularly in the central area where it should be conservation led.
 - 11) Existing infrastructure will need to be improved as part of regeneration of Northampton.
 - 12) Regeneration should also include provision and support for cultural, educational and creative industries.
 - 13) The deliverability of key regeneration sites in Northampton is critical to realising the overall vision for the area.
 - 14) Ensuring that Northampton does not develop into another amorphous town centre is vital.
 - 15) As many new properties as possible should be built close to the town centre rather than expanding greenfield development.
 - 16) Further detail could be provided in terms of the key priorities for regeneration and specific areas for intervention.
 - 17) Whilst the need to regenerate Northampton Town Centre is recognised, the extent of development required to change the character from a rural market town to 'city' is not feasible without very careful and sympathetic planning (and hopefully retaining a 'rural' emphasis).
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Question 15

Question – Do you support Objective 14? ‘To foster the regeneration of Daventry, Towcester and Brackley’.

Summary of Key Points Raised in the Responses:

Support

- 1) As long as regeneration is democratically led.
- 2) These areas have deteriorated, and regeneration is a must if they are to survive and not stagnate.
- 3) These towns need to be regenerated, but in a constructive and sympathetic manner that will not destroy their character or heritage.
- 4) Inclusive interactivity will encourage investment.
- 5) Daventry, Towcester and Brackley all have greater potential as market towns and rural centres.
- 6) Growth in these towns is inline with providing a sustainable balance between housing and employment and the important role of these towns in delivering services to their wider hinterland.
- 7) This objective is necessary to achieve the 2026 Vision.
- 8) Support if this means making existing towns greener without making them larger.
- 9) Regeneration will foster more job opportunities and will increase sustainability.
- 10) Support as long as regeneration is secondary to Northampton.
- 11) Regeneration will improve quality of life.
- 12) Regeneration of Towcester is enshrined in the *East Midlands Regional Plan*.
- 13) Development to the south of Towcester has the potential to realise many regeneration benefits including removing traffic congestion, creating jobs, building affordable homes, supporting public transport provision, providing investment in additional primary and secondary schooling and new public open space. New sports provision, cycling and walking trail provision will also be provided. These benefits will only be achieved if the level of development is sufficient to deliver the required level of strategic infrastructure.

Question 15 (Support) continued

- 14) Support provided the focus is on Towcester/Brackley/Daventry.
- 15) Support provided the focus is not on Towcester/Brackley/Daventry.
- 16) Regeneration not expansion.
- 17) Support as it will take pressure off the development of greenfield sites.
- 18) Any increase in prosperity within town centres has a good effect on a town's population.
- 19) Use small controlled development hand-in-hand with town centre regeneration.
- 20) Regeneration will protect these villages and be complimentary and supportive of the major growth at Northampton and Milton Keynes.
- 21) Support provided regeneration is on a scale commensurate with population influx figures and only absolutely necessary.

Object

- 1) Corby, Kettering and Wellingborough have more to offer.
- 2) What are the implications of 'regeneration' for Brackley?
- 3) These towns do not need to be regenerated.
- 4) This will require more building.
- 5) Towcester doesn't need regeneration; it just needs sympathetic organic growth, keeping it a true market town. Towcester's success lies in its human scale (i.e. most things at hand, not too big at the right scale with unusual and unique shops).
- 6) Brackley doesn't need regeneration; it just needs a sensitive reinvigoration, encouraging unusual and unique shops, becoming a little like Stow-on-Wold.
- 7) Each town may lose its individuality.
- 8) What is meant by regeneration? Extra population will not achieve this.
- 9) Limited residential development should be encouraged to ensure satisfactory levels of rural service provision.

Question 15 (Object) continued

- 10) Daventry, Towcester and Brackley are not in need of regeneration.

General Comments

- 1) Transportation, new homes and jobs must be sorted out as part of regeneration.
- 2) Any regeneration should occur in small clusters, mindful of existing infrastructure.
- 3) Replace “foster” with “support”.
- 4) Needs to be undertaken in a holistic manner, involving and not depriving other areas.
- 5) Towcester needs an A5 Bypass.
- 6) There should be a separate objective for regeneration at Daventry with Towcester and Brackley combined with rural areas and historic assets.
- 7) Brackley appears to have less emphasis within *the Emergent Joint Core Strategy* in terms of development even though the town is well placed (i.e. close to the Oxfordshire border for commuting).
- 8) Towcester needs the ring road in order to make it a safe and vibrant shopping and cultural centre.
- 9) Public opinion should be more seriously considered and that the focus must be placed on considering what is best for the residents of Daventry Town and district for the benefit of our communities.
- 10) Regeneration in these areas should not focus solely on retail but should also include uses such as banking, which have a valuable contribution to the vitality and viability of town centres.
- 11) Who will pay for it?
- 12) The creation of a bypass underpins many of the opportunities which will enable the regeneration of Towcester.
- 13) There should be a separate objective for Daventry which includes the regeneration aim but also includes enhancement of its retail, leisure, educational and employment roles.
- 14) There should be an objective for regeneration of rural areas and historic assets, including Weedon Depot, where this is needed.

Question 15 (General Comments) continued

- 15) Regeneration at Brackley will only arise when combined with growth of the town.
 - 16) Towcester requires an auditorium, flagship Public Park, market square and meeting place.
 - 17) Regeneration will only be achieved if a range of sites for housing, employment, retail and other uses can come forward throughout the entire plan period.
 - 18) Clear guidance is needed on how these towns can profit from an urban renaissance.
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Question 16

Question Do you support Objective 15? 'To enable and support the delivery of co-ordinated transport improvements with an emphasis on non-car modes; improving connections within and around West Northamptonshire including links to the wider network'.

Summary of Key Points Raised in the Responses:

Support

- 1) Public transport should be subsidised and tax receipts used to improve roads and provide transport.
- 2) Support, more investment is required in public transport.
- 3) This objective assists with social mobility and provides more people with options for work and leisure.
- 4) A balanced approach would benefit the residents of West Northamptonshire and assist in meeting the United Kingdoms own global targets on Carbon Dioxide (CO²) reduction.
- 5) Transport improvements are greatly needed.
- 6) Alternative forms of transport need investigating.
- 7) Existing train links are poor and access to Northampton station is atrocious. This would be improved by this policy.
- 8) Daventry needs good access to the rail network.
- 9) Proposals that promote the use of non-car transport for Silverstone Circuit are welcome.
- 10) Pollution levels would decrease.
- 11) Tram networks, cheaper frequent buses and a 'wiggly bus' initiative for villages should be considered.
- 12) Improved public transport will improve the movement of people in and out of the town and encourage more visitors and create jobs.
- 13) Public transport is more sustainable than private vehicles.
- 14) The urban extensions planned will increase the viability of public transport.
- 15) Northampton cannot cope with more traffic.

Question 16 (Support) continued

- 16) A cycle network to Brackley and villages would be a great asset.
- 17) Daventry 'Pods' proposal is a good idea.
- 18) At present, public transport lacks co-ordination outside towns.
- 19) No more roads need to be built and the existing road network will become overloaded without modal shift.
- 20) Good links and systems within West Northamptonshire would reduce outward migration and encourage regeneration.

Object

- 1) Modal shift has not worked elsewhere in the country. We cannot plan future transport on the predication that people will want to give up their cars. This will lead to inadequate infrastructure to cope with "pollution free" transport.
- 2) The refusal to consider out of town shopping close to residents will make transport less green.
- 3) Major new road infrastructure may impact the historic environment.
- 4) The strategy does not give any details as to what these improvements would entail, how they would be delivered, how much they would cost and who will pay for them. The only detailed transport improvements proposed here is a new dual carriageway and other road developments, which are completely at odds with an 'emphasis on non-car modes'.
- 5) Non car travel is realistic only for localised areas of community and certain centre to centre journeys.
- 6) Emphasis on much improved facilities for transport by car is essential to successful longer term development of villages and their surrounds for physical, geographical, technological, personal choice and economy of scale and specialism reasons.
- 7) Car travel is here to stay and needs careful consideration, accommodation and proper utilisation.
- 8) Village housing approach would not necessitate car use.
- 9) You cannot un-invent the car.
- 10) In conjunction with high levels of growth, the emphasis on non-car modes will create gridlock.

Question 16 (Object) continued

- 11) Provision of public transport is largely dependent on private commercial operators, it is unlikely to meet planners and users requirements. Therefore, provision for car use is essential.
- 12) Inter village rural roads need to be brought up to modern standards.
- 13) New road links are not necessary as they would cost money that the Council and Central Government do not have.
- 14) New roads would move population and workforce away from West Northamptonshire, and therefore work against regeneration efforts.
- 15) Rural areas cannot be provided with frequent, timely and cost effective public transport.
- 16) People will not walk any further than 500-1000 metres, and less if carrying large objects, like weekly shops. Furthermore, these large objects cannot be carried comfortably on public transport.
- 17) West Northamptonshire has an aging population by the end of the plan period over 50% of the population will not be able to walk long distances.
- 18) Due to technological developments, electrical/fuel cell powered cars have become cheaper and smaller. Ownership will increase and be cheaper to use than public transport.
- 19) Limited ranges of goods and services are provided in small villages. People will need to travel to larger centres necessitating car use.
- 20) Although internet bought goods and services have increased, they will need to be delivered by large delivery vehicles.
- 21) People should be able to choose both the mode of transport and the places they procure goods and services. A shift toward public transport will reduce this choice.
- 22) Noise and pollution will increase.
- 23) The re-routed A45 would consume acres of productive agricultural land, destroying rural employment and communities.
- 24) Public transport is too expensive.
- 25) Past and current policy is biased toward non-car modes, resulting in resources being wasted (e.g. road humps and capacity restrictions). This poor management means the problems are not efficiently dealt with.

Question 16 (Object) continued

- 26) Car use will increase given the lack of employment opportunities around Northampton.
- 27) Public transport doesn't work in largely rural areas like West Northamptonshire.
- 28) Daventry 'Pods' travel proposal is a bad idea.
- 29) Life is unpleasant without cars.
- 30) The change to non-car modes is a colossal challenge and there is no will to do so.
- 31) More roads need to be built.
- 32) As a disabled person, I rely on my car.
- 33) A truly integrated transport policy must be adopted that recognises the car as the primary mode of transport in the region.
- 34) Public transport does not work in sparsely populated areas like West Northamptonshire.

General Comments

- 1) The achievement of this objective is challenging, with different elements of policies which impact on transport being in conflict.
- 2) Additional wording is suggested to include rural connectivity.
- 3) Promotion of non-car modes and public transport should be trialled first, before committing major investment.
- 4) The Joint Planning Unit should consult with key users of cycle tracks and Rights of Way to establish a linked up approach to co-ordinated transport improvements.
- 5) It is vital that emergency service access is considered as it is essential that fire and rescue appliances, along with other emergency service vehicles can reach their destination within operation response times. Road schemes must be in line with the guidance on fire appliance access as set out within the Building Regulations (Fire Safety Approved Document B, Volumes 1 and 2).

Question 16 (General Comments) continued

- 6) An option could be to reinstate the Weedon railway link given it lies on the West Coast Main Line. Bespoke provision of an out-of-town train station like East Midlands Parkway should be considered for the Milton Keynes, London and Birmingham commuters.
- 7) West Northamptonshire should not become a concrete jungle.
- 8) Necessary transport infrastructure investment needs to be made in advance of development.
- 9) An out-of-town train station should be considered, like East Midlands Parkway.
- 10) Towcester needs a pedestrian zone at its centre with an inner ring road for vehicles to provide access to the perimeter. Plenty of parking need to be provided. The easier and faster it is to get in and out of a centre will make retailing more efficient.
- 11) Re-open the Northampton to Bedford rail line.
- 12) Subsidise public transport. Bring back the vehicle road fund license which had to be spent on improving roads and providing transport.
- 13) More mention needs to be made of the urgent need for the Flore-Weedon bypass.
- 14) Education needs to be provided to encourage modal shift.
- 15) Consideration should be given to the size, siting and number of schools in the sub-region. Walking to and from school should be encouraged and facilitated for health reasons and to reduce car use.
- 16) It is imperative that the Northampton Ring Road is completed.
- 17) A new train station needs to be added to the west rail line in Northampton.
- 18) The Northampton North West Bypass should pass to the north rather than the south of Harlestone Firs, whilst the road to the east of Northampton South East should extend to an improved A43 Moulton Bypass.
- 19) The Northampton Southern Development link Road and Town Centre Link Road should be shown as potential improvements.
- 20) For Daventry, the improvements to existing highway infrastructure should be extended westward along the existing A45 and extended as a new road to the west of the Ford Parts Centre.

Question 16 (General Comments) continued

- 21) The urban extensions proposed should include measures to ensure that non-car transport, with links to centres and transport interchanges, is included.
 - 22) This policy should be extended to include the movement of freight by non-car modes (e.g. rail and water).
 - 23) A connection between the east and west coast main lines should be encouraged.
 - 24) Central Government funding will be essential for this objective to be achieved.
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Question 17

Question - Do you support Objective 16? 'To achieve high quality design that takes account of character and local distinctiveness, enables access and promotes community safety'.

Summary of Key Points Raised in the Responses:

Support

- 1) Objective supported providing Northampton does not become another clone town.
- 2) Local distinctiveness in design should be retained.
- 3) Objective agreed but people should be involved in developing design codes.
- 4) High-quality housing should come as standard.
- 5) Responding to local character, imaginative design, creating sense of place and desirable areas to live is encouraged.
- 6) Strong support for this objective. Secured by Design should be a policy requirement in the Joint Core Strategy with Crime Prevention Design Officers involved in the designs for new developments.
- 7) The wider issues of community safety should be incorporated into the Joint Core Strategy. The requirements of the Northamptonshire Fire Rescue Service must be met - including adequate water supply, proper waste storage facilities, surveillance and appropriate lighting.
- 8) Objective supported, although requirement to provide high percentage of affordable housing indicates cramped overdevelopment.
- 9) Objective is self evident, though it is not clear to which objects such design will be applied.
- 10) Objective supported in order to promote individualism and provide distinct, separate characters to developments.
- 11) Policy supported. It is recommended that Commission for Architecture and the Built Environment (CABE), English Heritage, the Design out Crime and other key bodies are consulted on all plans to ensure development respond to local character, use local materials, build to the highest eco standard and vary building design to provide distinction from the developments in other areas of the country.

Question 17 (Support) continued

- 12) Objective supported provided this does not result in high cost project building, archaic design and unnecessary surveillance.
- 13) Community spirit, engagement and cohesion must be pursued in order to meet objective.
- 14) Objective supported, however, the term 'takes account of' is flimsy and does not recognise the requirements of regional and national policy or the latent quality of the existing built environment.
- 15) This will encourage more jobs and people to the area.
- 16) The objective is supported subject to reasonable building modernisation.
- 17) Objective supported in small scale developments not large ones.
- 18) Objective supported in principal although the issues within the policy are important and should be considered as individual objectives.
- 19) Principal agreed, although there must be recognition of local design qualities and hooks within the Joint Core Strategy to expand upon any strategic or detailed design issues.
- 20) Objective supported under the proviso that infrastructure is considered before development (Northampton North-West Bypass, links with Northampton to surrounding areas, Long Buckby Railway Stations and direct public transport to employment areas.)
- 21) Supported, proposal will rejuvenate old buildings.
- 22) The benchmark for high quality design in West Northamptonshire needs to be identified.
- 23) The objective should support the protection of environmental assets with the aim of achieving a net gain in biodiversity and enhancing landscape character and distinctiveness.
- 24) Good quality design will determine whether the vision succeeds or not.

Object

- 1) No confidence, based on past experience, that the objective of high quality design will be achieved.
- 2) The objective is too ambiguous, lack detail and therefore cannot be supported.

Question 17 (Object) continued

- 3) This objective will not be achieved without increasing flood risk.
- 4) Objective is undeliverable.
- 5) Building regulations have changed so significantly the objective is not achievable.

General Comments

- 1) Coordinated transport and infrastructure improvements are vital and should take priority.
- 2) More detail of proposals is required to assess whether local needs are being addressed through the objectives.
- 3) Current and recent housing developments, particularly 'affordable' houses, do not enhance the environment, largely due to lack of comprehensive consideration to infrastructure and the impact upon surrounding areas.
- 4) Community spirit and engagement is essential - more community cohesiveness should be encouraged in new developments.
- 5) Local character and distinctiveness, which is set out in village design statements should be taken account of.
- 6) Eco-homes are the future of house building.
- 7) Concerns over funding to achieve the objective.
- 8) Towcester and Brackley should retain their character as market towns.
- 9) More weight should be given to Parish Plans and local the local communities and groups in the design of developments. Parishes and Town Councils must be consulted regarding all development. Design will be improved if smaller developments could be influenced by local knowledge.
- 10) Must avoid high density developments. Larger gardens and improved parking must be ensured.
- 11) More support should be given to established local groups such as Residents Associations and Local Advisory Committees.
- 12) Safety of a development should be ensured but this should not be to the detriment of exciting design and individuality.

Question 17 (General Comments) continued

- 13) The Towcester Vale development proposals take full account of this objective. The new pattern of development responds to the existing pattern of Towcester with a unique character and identity.
- 14) This objective cannot be achieved through the development of large scale residential estates. Major development proposals all follow a similar 'design layout format' regardless of the specific location.
- 15) There is no allowance in the document for public spending on public buildings and spaces.
- 16) Local people should be involved in the development of design codes.
- 17) Townscape character appraisals, similar to Landscape Character Appraisals should be carried out.
- 18) The involvement of artists would benefit the design of developments.

Question 18

Question – Do you support Objective 17? ‘To provide a mechanism for the delivery of infrastructure (including health, education, transport, community, leisure and recreational facilities) in tandem with development’.

Summary of Key Points Raised in the Responses:

Support

- 1) All necessary infrastructure provision is vitally important.
- 2) Supports and notes that particular gaps need to be addressed in Brackley such as, leisure and recreation, health provision and car parking.
- 3) Supports the principle of a mechanism for the delivery of infrastructure in tandem with development. However, it is essential that this mechanism is sufficiently flexible in its application to allow for viability and site specific considerations to be taken into account.
- 4) Objective supported as, unless there is substantial government investment, experience shows that developers will resist providing much of the services required.
- 5) This objective is socially desirable and common sense.
- 6) We have good facilities already. Funds should go to enhancing these.
- 7) With a growing population, more infrastructure will be needed.
- 8) Local infrastructure needs to be in place to avoid unnecessary travel and associated inefficiency.
- 9) This objective is consistent with Planning Policy Statement 12: *Local Spatial Planning* requirement to tie development to infrastructure provision. It should also refer to the Infrastructure Delivery Plan.
- 10) Improved health, education, leisure and recreational facilities are needed in Daventry, Northampton, Brackley and Towcester.

Object

- 1) There is no confidence in the proposals to secure the delivery of specific physical social and green infrastructure which is required to support the development.

Question 18 (Support) continued

- 2) Infrastructure should be delivered prior or in parallel to development taking place. Past experience suggests that developer contributions have not provided adequate and timely infrastructure.
- 3) It is unrealistic and unnecessary to suggest there will be one mechanism by which infrastructure will be delivered and as such should be reworded. The type of mechanism is also unclear.
- 4) Current infrastructure deficits need to be addressed before contemplating future needs.
- 5) Further detail on infrastructure requirements, delivery mechanisms and their sources needs to be provided.
- 6) The cost of providing the necessary infrastructure is astronomical and existing services and facilities are overstretched with funding already restricted. The government cannot provide this money and nor can developers given the current state of the economy.
- 7) A detailed infrastructure plan needs to be provided.
- 8) The *Emergent Joint Core Strategy* needs to ensure phasing of development so that it is in place beforehand. This is not provided by the current objective.
- 9) Housing levels are not supported therefore the objective is not supported.
- 10) Development alone should not be the only way of funding infrastructure, public funding is also required.
- 11) Development should not be stifled whilst funding is sought from developers and/or infrastructure is secured beforehand.
- 12) More overt reference is needed to green infrastructure.
- 13) This objective should also refer to water and waste water infrastructure.

General Comments

- 1) Health, education and leisure need to be decentralised to reduce the need for people to drive.
- 2) Roof taxes and S106 legal agreements will not deliver timely infrastructure. Central government funding should be provided upfront for vital services, such as roads, sewerage, flood defences, flooding, schools etc.

Question 18 (General Comments) continued

- 3) The delivery of infrastructure will be hugely challenging particularly in the current economic climate.
- 4) Services need to relate to current local demographics (e.g. services for older people, and services needed by areas of family housing e.g. schooling).
- 5) Infrastructure is more than 'hard' infrastructure and the provision of social infrastructure should be included.
- 6) Section 106 legal agreements cannot be relied on to deliver the Vision, as they do not specify quality or design.
- 7) Job creation should be included in the definition of infrastructure and Information and Communications Technology (ICT) infrastructure should be seen as a fundamental requirement to growth.
- 8) Lord Rooker has given assurances at the House of Lords 2004 Select Committee Hearing into West Northamptonshire Development Corporation, that Infrastructure would come first. This includes flood alleviation mechanisms and green infrastructure.
- 9) The *Emergent Joint Core Strategy* needs to set out the role of all agencies in delivering infrastructure and how their performance will be measured.
- 10) Infrastructure provision needs to suit West Northamptonshire as a whole.
- 11) Make sure a roof tax is imposed at an early stage so that developers can adjust land costs from the start.
- 12) Developers should only be required to provide infrastructure that relates to their own development, rather than paying for existing deficits.
- 13) Infrastructure needs to be near housing as it is inconvenient to travel long distance.
- 14) The scale of development must suit the infrastructure provided.
- 15) This policy needs to set out that the mechanism for infrastructure delivery will be consistent with the test set out in Circular 05/2005 for consent conditions.
- 16) The mechanism should account for forward cash flow/burden required to implement the infrastructure for a scheme from the outset, particularly if the funding is, in part, from development.

Question 19

Question – Do you consider the Objectives to be specific to local circumstances?

Summary of Key Points Raised in the Responses:

Support

- 1) The fulfilment of the objectives must benefit the local community.
- 2) Objective supported, although the significance placed on providing a 5-year housing land supply may result in flawed appeals and local circumstances being ignored by developers.
- 3) Supported – importance of Northwest by-pass is emphasised.
- 4) Community spirit is in decline, the objective must seek to reverse this trend.
- 5) The local needs of Brackley must be considered through a Masterplan.
- 6) Principals of the objectives are supported but they do not reflect specific local circumstances.
- 7) The Plan should concentrate on fewer but more detailed objectives. Combining a number of objectives will provide greater impact and more focus to the Plan.
- 8) Objectives generally supported. At present, Joint Core Strategy does not appropriately deal with the key issues that will be associated with development of the scale proposed. Infrastructure provision is insufficient.
- 9) Supported, timeframe to decision is a concern.

Object

- 1) The West Northamptonshire area is too large for the objectives to be local. Individual towns have differing needs and cannot be summarised under one statement.
- 2) 'Local' regards Overstone as being part of Northampton built area - objective cannot be supported.

Question 19 (Object) continued

- 3) Local circumstances have not been considered - loss of rural villages through coalescence with the larger built areas will result in the loss of Northamptonshire's identity and culture.
- 4) Objective rejected, growth is disproportionate to local needs.
- 5) Insufficient consideration of the infrastructure needs will engineer the decline of the area overall.
- 6) The objectives are too generic, lacking detail and can be considered locally specific.
- 7) Ineffective and insufficient public consultation, development is not considered in terms of local circumstances.
- 8) Local issues in rural areas have not been addressed.
- 9) Plans are created by a non-elected QUANGO (quasi-autonomous non-governmental organisation) thus, the objectives are not supported.
- 10) Planners have no local knowledge and do not consider existing constraints on development sites – i.e. flood risk.
- 11) The plan is not sound under the requirements of *Planning Policy Statement 12: Local Spatial Planning* (PPS12). There is a lack of evidence to support the objectives within the Plan, particularly in relation to infrastructure capacity and employment provision.
- 12) The plan is based on inaccurate assumptions regarding the projected level of growth that is expected in the West Northamptonshire area. The Plan needs to be revisited and scaled down significantly.
- 13) The *Emergent Joint Core Strategy* does not take full account of new legislation, recommendations and strategies regarding sustainability, climate change and flood risk management. Funding to provide these requirements has not been considered.
- 14) The *Emergent Joint Core Strategy* lacks a robust evidence base; work regarding, employment, transport, green infrastructure and utility provision is insufficient.
- 15) Local circumstances in Northampton South East have been ignored.
- 16) The objectives are neither location specific nor related to key specific issues, as required by *Planning Policy Statement 12: Local Spatial Planning* (PPS12).

Question 19 (Object) continued

- 17) Objectives follow national guidance but are not considered within a local context. They are not measurable and therefore cannot be monitored.
- 18) Infrastructure has not been adequately considered by the Plan.
- 19) Questions are leading and encourage positive response.
- 20) Objectives centred on large scale urban extensions, it is unlikely this reflects local desires.

General Comments

- 1) The principal of growth in Northampton is questioned.
- 2) The objectives conflict with the plans that are proposed.
- 3) The question is too obscure to answer.
- 4) The landscape character and local distinctiveness of West Northamptonshire must be respected and enhanced.
- 5) The objective would be more suitable for towns in North England.
- 6) Joint Planning Unit Planners are inept - A361 major transport route is not considered in the plan.
- 7) Transport links between large urban centres need to be addressed.
- 8) A settlement hierarchy to include the rural settlements must form part of the Plan.
- 9) The Key Diagram is difficult to understand and the green infrastructure corridors are not clearly represented.
- 10) Funding to deliver infrastructure is insufficient to allow plan to be delivered.
- 11) Ratio of jobs per household, as per the current projections, is inadequate to support a reasonable quality of life for residents.
- 12) Northampton cannot compete with the larger urban centres of Milton Keynes, Oxford and Cambridge in terms of retail choice and high technology employment. The town should encourage should focus on internal invigoration and growth that is commensurate with the scale of a riverside market town.
- 13) Definition of local circumstances is required.

Question 19 (General Comments) continued

- 14) The document does not appreciate the linkages between West Northamptonshire and the neighbouring sub-regions.
- 15) Principles must be applied equally across the whole planning area and with the joint planning area to the north.
- 16) The objectives do not relate to all elements of the Vision – i.e. improvements to the Northampton riverside, Daventry International Rail Freight Terminal (DIRFT) or Silverstone.
- 17) More detailed assessment of sites is required to ensure objectives are delivered and guided by local circumstances.
- 18) Reference should be made to the role of West Northamptonshire as a key location for the logistics industry.
- 19) Contribution of both greenfield and brownfield sites must be acknowledged.
- 20) An objective to acknowledge the role of sustainable urban extensions to meet the vision must be included.
- 21) Locations of proposed development areas are not accepted.
- 22) Rejuvenation of urban centres should be considered before the development of greenfield locations. Greenfield development will encourage further decline of the quality of life for many West Northamptonshire residents.

Question 20

Question – Do you support the overall principle of Option B – focusing growth in a small number of larger development areas?

Summary of Key Points Raised in the Responses:

Support

- 1) Support provided care is taken to ensure villages are not adversely affected as a result of growth.
- 2) Option A would not create enough new homes with the required infrastructure. There would be even more pressure on present communities and facilities.
- 3) Support provided the level of funding sought from the development sector is realistic and reasonable in the prevailing economic climate.
- 4) West Northamptonshire has an abundance of transport links (i.e. the M1, A5, West Coast Main Line) that make it suited to the level of housing growth envisaged.
- 5) Support on the proviso that infrastructure is provided for existing areas as well as the new extensions.
- 6) Support provided that the urban extensions support existing free standing strategic sites and are not simply built on the edge of existing settlements.
- 7) This approach is the most sustainable, as it will necessitate less travel; allow expansion to be planned properly; allow incorporation of public transport, pedestrian and cycle routes from the outset and allow the creation of a good range of community facilities.
- 8) The scale of development required by the *Regional Spatial Strategy (RSS)* makes this option easiest to implement.
- 9) Population growth demands that these extensions be implemented.
- 10) Option B is preferred as it is more likely to deliver necessary infrastructure.
- 11) This option is consistent with national aims to achieve the prudent use of resources, using land wisely and efficiently in a way that respects the needs of future generations.

Question 20 (Support) continued

- 12) The small number of large developments proposed by this option will achieve a more reliable critical mass in respect of their viability and ability to bring benefits to both old and new communities.
- 13) Focussing development in the manner envisaged will enable greater control within the development process by minimising the number of stakeholders involved. This will increase the likelihood of delivery within the timescales envisaged.
- 14) The villages need revitalisation that will only come from growth.
- 15) This is the practical option.
- 16) As this option seeks to prioritise development on sites in urban areas first, it is consistent with paragraph 27 of *Planning Policy Statement 1: Delivering Sustainable Development*.
- 17) This option will be most cost effective in terms of infrastructure, due to economies of scale.

Object

- 1) Do not support either Option A or B.
- 2) Growth should combine elements of both options.
- 3) Option B will encourage the growth of new towns that are not fully integrated with existing communities, contrary to the aspirations of sustainable urban extensions.
- 4) Constraints of size, revenue, connections and proximity to locations more suited to transformation will prevent the elevation of Northampton from a town to a city.
- 5) New growth will make the existing towns too crowded, big and impersonal.
- 6) A new town should be provided to accommodate this growth. Northampton at present is over crowded and local facilities inadequate to accommodate this growth.
- 7) Development should be accommodated on existing brownfield sites. Based on previous work undertaken by Northampton Borough Council, there is reason to believe that up to 70% of the proposed growth can be accommodated on brownfield sites. Furthermore, *Planning Policy Statement 3: Housing* requires 60% of housing development on brownfield sites. The remaining 30% could be accommodated around smaller communities or in a small new town.

Question 20 (Object) continued

- 8) Development should be accommodated around existing transport routes, close to employment areas and/or in small extensions to villages.
- 9) There is insufficient social and physical infrastructure to support the large extensions proposed and/or infrastructure needs to be provided before the construction of any new homes. Developers will not provide the necessary infrastructure.
- 10) The large extensions proposed will result in a loss of rural identity, character, historic and landscape value. Substantial green belts need to be established around these towns.
- 11) New housing growth needs to match natural population growth, not exceed it, as proposed by this option.
- 12) The proposed level of growth will cause high levels of light, air and noise pollution.
- 13) There are numerous empty, boarded up houses in West Northamptonshire that should be occupied before new houses are constructed.
- 14) There is insufficient public and private finance available for the construction of additional houses as a result of the recession. As such, the assumptions underpinning the *Emergent Joint Core Strategy*, which was drafted before the recession, are incorrect. Delivery of necessary infrastructure and building rates will therefore slow significantly.
- 15) The proposed urban extensions are contrary to Human Rights law, as everyone has the right to protect their quality of life.
- 16) Previous experiences with the Northampton Development Corporation indicates that despite the Joint Planning Unit's (JPU's) aspirations, the urban extensions will be poor quality, not suited to residents and/or create high levels of crime.
- 17) The proposed houses will occupy valuable prime-agricultural land, which is needed for food and bio-fuel production.
- 18) The sustainable urban extensions proposed will not contribute to regeneration of Northampton, as people will commute elsewhere (e.g. Milton Keynes) and housing will be physically removed from the town centre.

Question 20 (Object) continued

- 19) There is no evidence to suggest that mixed developments of the nature proposed are attractive places for people to live, successful in terms of employment or in the provision of necessary public services. Accordingly, they are not sustainable.
- 20) Regeneration of the existing towns within West Northamptonshire could provide for the levels of growth envisaged without the need to develop Green Field land.
- 21) The levels of future housing provision in Daventry beyond 2026 are underestimated and need to be revisited against the criteria in *Planning Policy Statement 3: Housing* and associated advice produced by the Department for Communities and Local Government (CLG).
- 22) Development should focus on the northern part of Northampton, to build on the university and business opportunities there. This option would also prevent the workforce from commuting to Milton Keynes or London.
- 23) If the level of development was broken into smaller areas, development could commence sooner either in isolation or as part of a combined scheme with larger sites.
- 24) As a Strategic Housing Land Availability Assessment (SHLAA) or Urban Capacity Study (UCS) has not been produced, it is unclear whether there are deliverable or developable sites for this option. Furthermore, the proposed urban extensions are not consistent with previous UCS work undertaken by the authorities within West Northamptonshire.
- 25) Existing crime and deprivation levels in East Northampton, which is a past example of construction of large areas of housing on the outskirts of a town, are further evidence of why the growth proposed is not supported.
- 26) This growth could be accommodated in Northern England.
- 27) The proposed growth will exacerbate existing flood risk and/or be located within flood zones
- 28) Green Belt divisions need to be retained between towns.
- 29) The proposed houses will be located on areas with high recreational and leisure value, as well as providing habitat for wildlife.
- 30) There is no guarantee that the people living in these urban extensions will choose to work in them as well. As such, this aspect of the proposal is not sustainable.

Question 20 (Object) continued

- 31) The proposed urban extensions are developer led, as it is easier to develop green field sites rather than brown field.
- 32) No evidence of infrastructure levels needed for the urban extensions proposed has been provided. Accordingly, the *Emergent Joint Core Strategy* may be found not sound as it is not consistent with paragraph 4.8 of *Planning Policy Statement 12: Local Spatial Planning*.
- 33) This option provides no contingency, should sites not come forward as planned.
- 34) No evidence has been provided of the impact of this option on historic, landscape and/or biodiversity.
- 35) The Joint Planning Unit prefer option B as the development of green field sites as proposed is the most cost effective for developers, thus yielding the highest possible section 106 contributions.
- 36) This option has been thrust upon local people by Central Government. Local people do not want this option.
- 37) Development needs to be spread evenly through West Northamptonshire, rather than focussed on those areas suggested in this option.
- 38) This option is not consistent with the *East Midlands Regional Spatial Strategy*, as no evidence has been provided to indicate that these urban extensions are the most sustainable. This option also does not meet Policies 1, 3 and 4 of the document.
- 39) A definition of 'large development area' has not been provided.
- 40) West Northamptonshire has received more than its fair share of growth over the last 50 years.
- 41) This option bears no resemblance to the options deemed most suitable by the public after the preferred options consultation, namely development around North Northampton and the M1.
- 42) This option is flawed as it does not take into account the proposals of the East Northamptonshire Joint Planning Unit and the Milton Keynes Growth Area.
- 43) This option is against Central government policy that seeks to rejuvenate rural areas and reduce the carbon footprint.

Question 20 (Object) continued

- 44) Due to the current review of the *East Midlands Regional Spatial Strategy*, it is premature to consider housing provision beyond 2026. Accordingly, the total housing provision should be 40,375 homes not 43,000. The basis for these large urban extensions is therefore flawed.
- 45) Some small scale development can occur that makes efficient use of infrastructure and environmental capacity. As such, it is incorrect to assume that this efficiency should be the basis for selection of Option B.
- 46) Development needs to occur on both urban and greenfield sites in tandem to ensure growth is delivered in a timely manner. As such, the priority given to urban sites in this option is flawed.
- 47) It will take a long time to implement infrastructure on these large sites compared to smaller sites. As such, housing delivery may be delayed.
- 48) It may be difficult to find willing landowners and developers to construct these large development areas within the timeframe of the plan.
- 49) The Sustainable Urban Extension concept was previously rejected in the *Northamptonshire County Structure Plan*.
- 50) Option B is a massive over-response to an excessive regional requirement. The residual requirement for development in Northampton is 11,442 of which around 9,400 should be on brownfield sites and 2000 on greenfield sites.
- 51) Incremental organic growth would be more realistic and manageable in terms of infrastructure provision.
- 52) Building large faceless estates will separate people from existing communities, further increasing the disjointed and transient population of Northampton.

General Comments

- 1) Developer contributions must be paid into a fund controlled by an accountable body to ensure funding is directed is retained for specific purposes.
 - 2) More explanation is needed on the type of employment arising from the development. For example, will it be short term associated with the construction of all the homes or new employment areas providing long term employment.
 - 3) The *Emergent Joint Core Strategy* needs to specify what priority is given to each growth area.
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Question 21

Question – Do you support the combined Choice of Urban Extensions?

Summary of Key Points Raised in the Responses:

Support

- 1) I support the combined choices of urban extensions.
- 2) Generally support, but some reservations about the detail.
- 3) I support the principle, but not all of the choices.
- 4) Provided there is public support, particularly from local communities.
- 5) The choice of urban extensions and the reasons for them seem reasonable logical.
- 6) Only if substantial improvements are made to infrastructure before development.
- 7) They will encourage more diversity and the development of job opportunities.
- 8) Support for urban extensions at Towcester in conjunction with a new by-pass.
- 9) Policy approach supported providing investment at Towcester, Brackley and Daventry encourages improved infrastructure and new by-passes.
- 10) Principle of growth is accepted, although the model of urban sprawl is not acceptable.
- 11) Supported, scale of extensions must ensure the most sustainable combination of options is delivered.
- 12) Support expansion to the north-west and south of Northampton.
- 13) Support for the extensions at Brackley.
- 14) Northampton West and Junction 16, M1 options are supported as the most sustainable pattern of development.
- 15) Support the inclusion of the extant local plan allocation Buckton Fields, Northampton.

Question 21 (Support) continued

- 16) Support for Northampton South East as the most sustainable development option that has a sufficient critical mass to deliver new infrastructure requirements.
- 17) Proposals must meet the tests of soundness set out in *PPS12: Local Spatial Planning*.
- 18) Support and the CEMEX site at Stony Stratford should be allocated as an urban extension associated with Milton Keynes.
- 19) Support the positive planning approach to infrastructure delivery within the *Emergent Joint Core Strategy*.
- 20) Support, provided that the land is not a highly valued green environment.
- 21) Supported, although the extensions must not be cut off from urban areas by physical barriers. Development must be fully integrated with existing towns.
- 22) Must promote sustainable travel patterns toward the town centres.
- 23) Support for Daventry North which is identified in numerous studies as a sustainable direction for growth. The reasoning behind its allocation beyond 2026 is unclear.
- 24) Support the allocation of Silverstone for a strategic employment site.
- 25) Support for Option B.
- 26) Support development around Junction 15, M1 and Junction 16, M1 because of the good road connections.

Object

- 1) The options to the south and west of the M1 should not be ruled out and offer sustainable extensions to Northampton.
- 2) Disused and brownfield sites must be developed prior to greenfield sites.
- 3) Existing infrastructure is incapable of accommodating growth and improvements must be in place before development.
- 4) The town will not benefit from these urban extensions.
- 5) Northampton and other town centres will not be improved and regenerated by urban sprawl at unsuitable locations with poor infrastructure. These options are therefore misguided.

Question 21 (Object) continued

- 6) If new houses are to be built in Northamptonshire they should be kept in line with the natural population growth of the County.
- 7) There is no relationship between the *Emergent Joint Core Strategy* and the *Northampton Central Area Action Plan*.
- 8) The preferred locations do not provide good access to the central area of Northampton. Residents will be more inclined to travel to Milton Keynes for shopping and retail needs.
- 9) This is just another overspill scheme to relieve London and the South East of people and the pressure on those areas by building on our countryside.
- 10) Growth would be better accommodated in new towns planned as separate entities.
- 11) We need to retain valuable agricultural land.
- 12) There should be smaller developments, more evenly spread across settlements. Small scale development in villages would be supported by communities.
- 13) None of the development options are supported.
- 14) Northampton should not grow beyond its existing boundary.
- 15) Not enough consideration given to transport links. The current transport system cannot sustain this level of growth.
- 16) I disagree as I live in a parish destined to be over run.
- 17) The options will destroy what little heritage remains.
- 18) Increase in traffic is unacceptable.
- 19) The report does not identify the opportunities for providing multi-storey accommodation for young professionals and students.
- 20) Northampton cannot be 'grown' on an 'immigration' basis.
- 21) The plan to create urban sprawl, without the central focus for each new area, would not help create a community.
- 22) As a resident of the town, I do not want to see the rural outskirts of the town destroyed by ill thought out development when we could be designing excellent settlements with a little more short-term effort.

Question 21 (Object) continued

- 23) The options are not sufficiently evaluated and there is too little detail about the infrastructure required.
- 24) Brackley is already too large for the existing infrastructure.
- 25) The east of Daventry could be improved by the replacement and relocation of the 'tin sheds' near the town centre with housing.
- 26) It is unclear how the housing options have been influenced by the *Northampton, Towcester and Brackley, and Daventry Landscape Sensitivity Studies*.
- 27) The options are contrary to Government policy to protect green belts.
- 28) The options will result in unacceptable adverse impacts on biodiversity.
- 29) Development with direct/easy access to M1 is not sustainable. It will encourage people to travel to Milton Keynes and discourage the regeneration of Northampton Town Centre.
- 30) The options are not supported. Land at Arm Farm, south of Milton Malsor, has been inappropriately assessed in the *Strategic Employment Land Assessment (SELA)* and provides a deliverable option for significant growth in the area.
- 31) The principle and scale of growth in West Northamptonshire is not supported.
- 32) The policy does not take into account The Audit Commission's independent report published in September 2009 which recommends greater emphasis on the regeneration of existing properties.
- 33) Objection to growth at Daventry until the Inspectors report from the 2009 Planning Inquiry has been issued.
- 34) The northern, western and south-eastern expansions of Northampton are predicated on major road improvements. This approach is not sustainable and contradicts the shift to non-car transportation modes.
- 35) Options not supported. The rejection of the 'Highgate Development' *Northampton Option 5 (South of M1 and South-West)* is not accepted as it would provide a more sustainable, suitable and successful extension to Northampton.
- 36) Job growth is insufficient to support the levels of planned housing growth.

Question 21 (Object) continued

- 37) The skills base of the population will not support aspiration to attract knowledge based industries.
- 38) Development at Towcester, Daventry and Northampton is opposed.
- 39) The growth projection informing level of housing growth is inaccurate and the JPU estimates of the housing requirement and past completions are incorrect. The urban extensions are therefore unjustified.
- 40) The extensions are contrary to the national target of 60% of new development on brownfield land. Brownfield land should be used first.
- 41) The *Emergent Joint Core Strategy* is premature and pre-empts the review of the *Regional Spatial Strategy*.
- 42) The proposed extensions at Daventry are not supported.
- 43) The *Emergent Joint Core Strategy* does not reflect the development options consulted upon as part of Issues and Options stage.
- 44) The proposal for Junction 16, M1 is not supported and would result in coalescence of Northampton and Kislingbury.
- 45) Employment growth for the existing population must be prioritised over housing growth.
- 46) The regeneration of Northampton Town centre should occur before extensions are built.
- 47) The brownfield land supply is understated and the scale of urban extensions is not justified.
- 48) Regeneration and intensification of areas in decline should be considered – European Union/Government funding could be sought.
- 49) There is no evidence base to suggest Sustainable Urban Extensions (SUEs) would be successful. SUEs were rejected as part of the *County Structure Plan*.
- 50) Northampton South is not supported.
- 51) Employment should be located near major transport routes.
- 52) Development will increase the level of crime.
- 53) Too much development is being focussed in Northampton.

Question 21 (Object) continued

- 54) Comments within the Strategy are misleading and it is questioned whether a fair and a proper basis is provided for the policy.
- 55) There is a lack of detail to explain the location and quantum of housing as part of the extensions.
- 56) Requiring more affordable housing in rural areas will reduce the attraction of these areas and restrict urban to rural movements resulting in the demise of rural communities.
- 57) Oppose development at Northampton North.
- 58) The *Emergent Joint Core Strategy* appears developer and land owner led. Completions of the extension will be to maximise profitability and will not give adequate weight to environmental and social considerations.
- 59) *Emergent Joint Core Strategy* consultation does not give adequate weight to the comments provided by consultees.
- 60) Daventry North, Northampton North and Brackley North are not sustainable development options.
- 61) Concerns that the *Emergent Joint Core Strategy* plan period is beyond that of the *East Midlands Plan*, this will have implications in terms of the existing evidence base, in particular the application of the emerging water cycle study.
- 62) Northwest Northampton has not been considered in the plan preparation process and there must be significant opportunities in this area.
- 63) Development is too focused toward the south of Northampton, resulting in unsustainable and uneven development pressure in this area – particularly in terms of infrastructure and the existing road networks.
- 64) The scale of growth at Towcester is insufficient to provide the funding to implement the bypass and infrastructure as. The scale of growth at this settlement will need to be increased.
- 65) The lack of detail regarding the extent of the growth options adds to anxiety and increases the opposition in the communities that are affected.
- 66) These proposals should be locally and democratically decided.
- 67) Enveloping surrounding local villages with extensions to urban areas is not supported.

Question 21 (Object) continued

- 68) Concern over inclusion of Daventry North as a potential direction of growth. The limited studies regarding the suitability of the site, particularly early in the plan period, indicate that the inclusion of this site is illogical.
- 69) The evidence base does not support the Plan. The *Emergent Joint Core Strategy* is rejected in its entirety.
- 70) The communities occupying recent development the west and south of Northampton are lacking the proposed infrastructure / un-adopted roads. There is also a substantial amount of development that has been permitted but is not yet constructed. These sites must be completed with adequate infrastructure before new development is considered.
- 71) Water runoff increases have not been considered in the Plan.
- 72) Increasing the number of houses will improve affordability, but will lower property value of existing stock.
- 73) Existing housing stock should be used before new developments are built.
- 74) Growth at South East Northampton is not supported.
- 75) Flooding occurs west of Northampton and valuable countryside would be destroyed to the south-east. Development to the north and east would be preferable.
- 76) Northampton cannot cope with the planned level of growth. Brackley would appear to be better placed to support large scale development.
- 77) The ultimate aim appears to be to join Northampton to Daventry, with the M1 as the High Street.

General Comments

- 1) If expansion is unavoidable, would the land to the north of Northampton, towards Kettering, be a better option? Kettering is fast expanding with new rail links and infrastructure and would possibly benefit from new housing.
- 2) New infrastructure must be funded entirely by developers and central funding sources.
- 3) The areas that have been spoilt, such as the M1 corridor to the West of Northampton and the towns to the east, such as Wellingborough, Kettering and Corby could be considered for development.

Question 21 (General Comments) continued

- 4) Towcester must have a bypass.
- 5) Some of the key landowners that own land forming the options are opposed to development.
- 6) Northampton needs to stay east of the M1.
- 7) Daventry needs to grow North and East towards rail and water links.
- 8) Concern regarding the lack of infrastructure in Northampton North.
- 9) The Strategy should identify the key strategic employment sites in the same way as it has done with the urban extensions.
- 10) No further development is required locally.
- 11) Those who do still commute into Northampton town to work encounter as much traffic leaving the town centre as those entering it, demonstrating that if housing is placed in the town centre people will commute outward to business areas or other areas.
- 12) Consultation has been ineffective and insufficient.
- 13) Not enough detail is provided on the regeneration of Northampton itself.
- 14) The scale of growth will be to the detriment of many communities, especially in villages.
- 15) Modal shift in transportation is unrealistic as demonstrated by up-to-date traffic modelling statistics and projections.
- 16) Mixed development opportunities will be important.
- 17) Public transport improvement required between Northampton, Daventry and Long Buckby.
- 18) The quantum of housing at each urban extension must be explained.
- 19) The viability of the affordable housing requirement should be considered on a wider range of sites, not just those on those of 50 dwellings or more.
- 20) The timescale of the Core Strategy is out of date and adoption will not be possible by September 2009.
- 21) The regeneration of Town Centres must be encouraged by the Strategy.

Question 21 (General Comments) continued

- 22) Identification of employment land within the extensions should not prejudice the potential that can be offered within existing built up areas.
- 23) Insufficient detail is provided to comment accurately on plans.
- 24) The *Emergent Joint Core Strategy* lacks detail in explaining how the housing targets of the Northampton Implementation Area (NIA) will be met. The housing trajectory that was purported to inform the Core Strategy would be useful in determining the achievability of the Core Strategy in meeting these objectives.
- 25) The extent of the Northampton Implementation Area (NIA) must be defined in adopted version of the Core Strategy.
- 26) Reference in the *Emergent Joint Core Strategy* to the 43,000 units as part of the NIA cannot be found in the *East Midlands Regional Plan*. The *Emergent Joint Core Strategy* is above the figure that is required in the *East Midlands Regional Plan*.
- 27) The Housing Technical Paper is not available to support housing figures and there is no explanation as to how the residual housing figures have been arrived at.
- 28) The Core Strategy should be clear in its intentions of prioritising brownfield, urban regeneration sites.
- 29) The growth directions have not been clearly shown. The extent of and the need for urban extensions must be defined.
- 30) Brackley East should be promoted for mixed use development and not 'purely for employment'.
- 31) Alternative development sites should be considered at this plan preparation stage.
- 32) Concern that urban extensions would deter regeneration/growth of town centres and smaller surrounding settlements.
- 33) The Dallington Grange, Northampton allocation has not been given sufficient recognition in the *Emergent Joint Core Strategy*.
- 34) The opportunities in North Northampton to create a '*knowledge corridor*' and the '*University Arc*' associated with the Northampton University, Moulton College and Northampton College have been missed. Limited growth here will limit the potential to provide the infrastructure to open up this area to development.

Question 21 (General Comments) continued

- 35) The involvement of the Department for Transportation, Highways Agency and Northamptonshire County Council will be vital in ensuring that achievable delivery targets and timeframes are set.
 - 36) Development at the Wootton site is promoted.
 - 37) Junction 16, M1 is integral to the delivery of the employment targets within the strategy. To caveat its allocation with a requirement for further study prejudices the allocation of this site.
 - 38) A settlement hierarchy must be produced in order to examine the potential for lower order settlements to accommodate some level of sustainable growth.
-

Question 22

Question – Do you support the policy approach for Affordable Housing and particularly the provisions suggested in Table 6.1 ‘Levels of Affordable Housing – from Affordable Housing SPD sites of 15 or more dwellings’?

Summary of Key Points Raised in the Responses:

Support

- 1) Support the policy approach, but consider that levels should be reduced in communities where affordable housing has already been provided.
- 2) Support the policy approach, but consider that local opinion regarding the location of sites must be respected.
- 3) Support the threshold and/or levels of Affordable Housing provision.
- 4) Support the policy approach, but consider that affordable housing needs to be linked to employment and public transport to be sustainable.
- 5) Affordable housing is much needed in West Northamptonshire.
- 6) Affordable housing provides a variety of purchase and rent options for home purchasers.
- 7) Affordable housing will allow young people to stay in the area.
- 8) Support provided this policy also applies to existing housing estates.
- 9) Affordable housing will make rural and/or urban areas socially and economically sustainable and regenerate them.
- 10) Supports affordable housing on the proviso it is ‘pepper-potted’ amongst market housing and/or centrally located.
- 11) The figures presented are consistent with the *East Midlands Regional Spatial Strategy*.
- 12) Affordable housing is needed to ensure that there is a workforce to support the development of the region.

Object

- 1) The threshold and/or levels of affordable housing sought are too low and will not meet market demand.

Question 22 (Object) continued

- 2) The threshold and/or levels of affordable housing sought are too high and will make many developments unviable.
- 3) The affordable housing requirements should be reassessed in light of changes in the financial and housing environments.
- 4) Concerned that there is an apparent intention to allow affordable housing in any location, including the countryside.
- 5) An additional policy is needed to prevent developers artificially submitting multiple planning applications for schemes of fewer than 14 units.
- 6) Viability testing should apply to development under 50 units and at trigger points in larger schemes to allow for changing market conditions.
- 7) Viability testing delays developers' responses to provision.
- 8) Affordable housing levels should be set by Local Councils as they can identify which villages can support additional housing and address local need, with the support of the existing residents and the local Parish Councils.
- 9) Affordable housing provision will create slums.
- 10) Blanket approaches to affordable housing should not be used given variations in local circumstance and the differences in viability between rural and urban sites.
- 11) No evidence has been provided for how these figures were established or their viability. Many schemes will become less viable in the future due to increasing levels of s106 contributions, the recession and the Community Infrastructure Levy.
- 12) The population growth figures have been overestimated. Therefore, the demand for affordable housing is overestimated.
- 13) Affordable housing does not help the majority of young people who cannot afford their own home.
- 14) Table 6.1 is unclear in that no explanation is given for the asterisk in the 'Level of Affordable Housing' column. The sums equal more than 100%. What percentage will apply to 'Sustainable Urban Extensions', which are intended to function as extensions to urban areas but are currently rural?.
- 15) Mixing affordable and private market housing creates problems [*note: these problems are unspecified by respondent*].

Question 22 (Object) continued

- 16) Affordable housing will bring non-local people to the area.
- 17) Affordable housing provision will take-up more land.
- 18) These figures need to be reconsidered given the recent out-migration of immigrants.
- 19) More detail needs to be provided in the *Emergent Joint Core Strategy*, rather than a subsequent Supplementary Planning Document as the latter cannot be legally tested.
- 20) These figures are premature, in light of the forthcoming *Developer Contributions Development Plan Document*.
- 21) Pockets of affordable housing generate crime and anti-social behaviour.
- 22) Affordable housing will reduce house market house prices in areas where it is located.
- 23) Affordable housing will negatively change the fundamental character and make-up of an area.
- 24) Huge levels of affordable housing may strain infrastructure and take away land from much needed green space.
- 25) There will be no employment available for the occupiers of these affordable homes.
- 26) The levels of affordable housing proposed are far higher than the target set by the Government.
- 27) These levels should not be committed to until a Strategic Housing Market Assessment (SHMA) is completed.
- 28) A wide range of affordable and rented houses already exists in Northampton.
- 29) The focus should be on 'intermediate' housing as 'social rented' housing is not valued by its occupants.
- 30) The 50% target in the South Northamptonshire Rural Area is not viable. Urban areas should have higher targets as they have the necessary infrastructure.
- 31) A consistent approach should be adopted across the whole area rather than trying to adopt different percentages in different areas.

General Comments

- 1) The quality, safety and density of affordable housing needs care.
 - 2) The focus needs to be on areas that can be developed at low cost to provide affordable housing for local communities.
 - 3) Affordable housing should only be constructed on previously developed land, not green field.
 - 4) Is the 'Development Control Authority' referred to the WNDC or Local Councils?
 - 5) Does more affordable housing create less employment?
 - 6) Strict planning conditions must be laid down to ensure tidy and clean sites.
 - 7) What does 'open book basis mean'?
 - 8) Where is the 'Northampton Implementation Area'?
 - 9) More detail is needed indicating what policy mechanisms would be used to secure affordable housing.
 - 10) An exceptions policy for rural areas needs to be introduced to make affordable housing provision in these areas more viable.
 - 11) Empty properties in Northampton could be used for affordable housing.
 - 12) Affordable housing in towns will be attractive to young people wanting to access facilities and will reduce car use.
 - 13) Further clarification is required as it is not clear whether the policy approach refers to the number of dwellings or the percentage of affordable housing that will be required.
 - 14) Flexibility is required to negotiate on a site by site basis in the context of viability considerations.
-

Question 23

Question – Do you support the policy approach for Gypsies and Travellers accommodation? In particular do you support the criteria defined?

Summary of Key Points Raised in the Responses:

Support

- 1) People need a permanent site to live on and it would be better to designate a site in Northampton than ruin a countryside site.
- 2) Provision for the gypsy and traveller community is welcome and their participation in the consultation should be encouraged.
- 3) Support, but needs to be sensitive to the requirements of existing communities nearby.
- 4) Support provision, but this is not always achieved.
- 5) The policy and site criteria seem reasonable.
- 6) Sites need to be near urban areas and trunk roads.
- 7) Important to address this long standing need.
- 8) Sites which are provided should be properly managed and the facilities maintained from charges levied on the users of the sites.
- 9) Support, as long as the traveller community accept the site.
- 10) Planning this in advance will design out future problems.
- 11) Support in principle, but think that provision should also be made for travelling circuses.
- 12) Accommodating travellers on designated sites is the best way to prevent illegal camping on lay-bys, verges and green space.
- 13) Support, but anti-social behaviour will need to be dealt with.
- 14) Support, but the term 'pitch' needs to be clearly defined.
- 15) Support, but further information is required regarding the additional work required and the planning considerations involved.
- 16) Support small sites provided they are not close to residential areas.

Object

- 1) The provision of sites should not place a burden on community funds.
- 2) The plan should commit to the provision of the pitch numbers identified in the *Gypsy and Traveller Accommodation Assessment (GTAA)* up to 2017 and also estimate the likely additional numbers that would be required up to 2026.
- 3) The plan should specify the need for robust GTAAs and commit to a review of the GTAA.
- 4) The criteria specified should apply to applications for sites to meet unexpected demand and not just to site allocations.
- 5) The criterion relating to '*accessibility to services*' is unduly restrictive and should be amended to read '*the site is reasonably accessible to local services*'.
- 6) Landscaping should be considered on a site by site basis, and if this criterion is retained the words '*where necessary*' should be added.
- 7) The criterion regarding maximum pitch numbers should be deleted as it is arbitrary and unnecessary.
- 8) This issue is wholly spurious and irrelevant in a study of this magnitude, and should be dealt with separately.
- 9) Concern that sites should not be provided unless occupants pay the local taxes and contribute to the community.
- 10) It is questioned why permanent sites are needed if the gypsy lifestyle is nomadic. If a settled existence is required then they could occupy housing. Greater emphasis should be given to transit sites rather than permanent ones.
- 11) The number of sites specified in the GTAA is over-exaggerated.
- 12) Sites are already provided at Irchester and Ecton.
- 13) Concern that the sites provided will not be adequately maintained and that the local authorities will fail to deal with associated problems.
- 14) Permanent sites need to be used efficiently and protected from damage and destruction.
- 15) Concerned about crime and anti social behaviour associated with sites.

Question 23 (Object) continued

- 16) Priority should be given to local communities, and sites should be subject to their agreement.
- 17) Brackley has no land available.
- 18) The policy approach needs to ensure that environmental assets are safeguarded and/or enhanced. The mitigation approach set out is inadequate and should focus on selecting sites having regard to environmental impacts first.
- 19) Suggested provision for Northampton of 26 + 5 transit pitches is too high and should be spread to other parts of the county.
- 20) Sites should be in urban areas on brownfield sites away from rural communities.
- 21) Sites should be removed from existing or planned housing. Locating sites within housing estates will not work.
- 22) Concern about the impact on property values.
- 23) There is no mention of policing supervision and security.
- 24) Neither community has any desire to integrate because lifestyles are fundamentally different. This should be recognised in the policy.
- 25) Insufficient information is provided as to where sites would be located, why the accommodation is needed or the impact it would have on local communities.
- 26) Concern about who will pay for these facilities. Sites should be provided and paid for by travellers themselves rather than tax payers.
- 27) What is proposed will not solve the problem. The government owns vast areas of land which could be considered for proper sites for genuine traveller communities.
- 28) No reference is made for the need for sites to be notified and reviewed under normal planning controls. Why should gypsies and travellers be given planning opportunities that are denied to others?
- 29) The document should be clear on how the locations will be identified and published for public comment.
- 30) Add a bullet point to indicate that sites will be monitored and any problems dealt with.
- 31) Remove the word 'normally' from bullet point 7.

General Comments

- 1) Would like to know where and how many pitches currently exist in West Northamptonshire and the empirical evidence that an increase is needed.
- 2) This is a sensitive and emotive issue given public perception, and a suitable solution may be difficult to achieve.
- 3) If sites are not transient but catering for fixed communities is their status residential as all services should be in place?
- 4) The limit of 11 to 15 pitches is an assumption and should be assessed on a case by case basis.
- 5) How does provision compare with other similar areas?
- 6) The travelling fair site on A428 has not led to any complaints.
- 7) Concerned about the future maintenance of these sites.
- 8) Choice of location needs to be carefully considered to prevent an adverse effect on local communities.
- 9) Location of sites needs to be part of a 'whole package' of measures to accommodate and socially merge these groups.
- 10) According to the criteria there are no suitable sites in Kislingbury Parish or in the area between Northampton and the M1.
- 11) The pitch requirements accord with those set out in the *Regional Spatial Strategy*.
- 12) Concern regarding who pays for these sites and whether the gypsy and traveller communities contribute.
- 13) The importance of planning for the gypsy and traveller community should not be overlooked.
- 14) The Campaign to Protect Rural England (CPRE) is currently reviewing this matter and will comment.
- 15) In order to be sustainable sites should be in urban areas as rural areas do not have the infrastructure to support them.
- 16) The Government want adequate accommodation to be provided where there is clear evidence of need. The policy approach appears to address this and provide a means for reviewing figures in future years.

Question 23 (General Comments) continued

- 17) Specific comment regarding the lack of capacity at Whilton Sewage Works to support the planned pitches.
 - 18) Great Oxenden is meeting Daventry District's 2007-2012 requirements with sites at Justin Park and Braybrooke Road. Taking into account provision elsewhere no more sites are needed.
 - 19) Insufficient information is provided to comment on, i.e. how many sites will be created and where will they be?
 - 20) The page on gypsies and travellers appears somewhat out of proportion in the document, when compared to the lack of reference to other ethnic, religious or social groups.
 - 21) There is a mistake in the table at section 6.4.8. It needs to be amended to match the figures published in the GTAA (page 114).
 - 22) For consistency the criteria used in the policy could match those used in the *North Northamptonshire Core Strategy*.
 - 23) The criteria for transit sites or temporary stopping places should be different as there is less need for accessibility to local services. The location could be remote from other communities but have access to the trunk road network.
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Question 24

Question – Do you support the policy approach to employment demand and supply?

Summary of Key Points Raised in the Responses:

Support

- 1) Revitalise local businesses.
- 2) Supported. The importance of the area as a key B8 (Storage and Distribution planning use) location and its significance for the current and future economy must not be overlooked.
- 3) Impact of recession must be fully considered.
- 4) Training of workforce must be commensurate with the levels of growth.
- 5) High tech, fashion and culture employment is encouraged.
- 6) Links with Northamptonshire Enterprise Limited to encourage green economy and investment in higher education.
- 7) The Joint Core Strategy must be aligned with evidence base, current policy and emerging policy – contradiction between site area of Junction 16, M1 employment site in the *Emergent Joint Core Strategy* and the *Northamptonshire Strategic Employment Land Assessment (SELA)*.
- 8) Links with areas beyond the sub-region must be considered – i.e. the radio mast site at Rugby.
- 9) Differentiation must be made between different areas. Northampton / Daventry promote B8 (Storage and Distribution), Towcester and Brackley draw small B8 element with mix of B1/B2 (Business/General industrial planning use).
- 10) Support approach to provide sufficient suitable unconstrained sites to meet potential latent market demand and discourage future investment locating elsewhere.
- 11) Employment growth at Towcester can be supported by allocation of a mixed use development at Towcester Vale.
- 12) Policy approach supported – emphasis should be placed on providing high quality office space not industrial land.
- 13) Supported, although equal recognition should be given to B1, B2, B8 and sui generis uses.

Question 24 (Support) continued:

- 14) More urban brownfield sites need to be made available for small businesses.
- 15) Political manipulation will control employment supply and demand.
- 16) Diversity of employment is supported - specialisation, i.e. motor sport / engineering is encouraged.
- 17) Policy approach supported to decrease the need for out commuting by existing and future residents.
- 18) Support for increase in non B class uses (commonly defined as including retail, tourism, leisure education, and health) but these uses must not be restricted to town centre areas. This narrow policy approach will not encourage the job opportunities sought by the Strategy.
- 19) Reference should be made to non B-uses as part of local centres within the sustainable urban extensions.
- 20) Significant policy shift will be required to ensure that non B-class uses are achieved.
- 21) Principal supported, however, the location of B8 use should not be determined through Core Strategy and should form the basis of the Site Allocations Development Plan Document, Area Action Plans or through individual planning applications.
- 22) Consider the concept of established employment land delivering additional floor space quicker than sustainable urban extensions.
- 23) Supported, University should be the focus of a high tech employment area.
- 24) Principal supported – removal of statement *‘there is adequate supply in high quality industrial and warehousing sites...’* recommended as this may constrain the future growth of the B8 sector.
- 25) To encourage flexibility in the plan paragraph 6.5.6 should be omitted.
- 26) The importance of non B-use for generating employment must be reflected in the policy approach.
- 27) Support principal although there is no action/implementation plan to explain how this will be achieved.
- 28) Sustainable urban extensions will be capable of accommodating employment growth.

Question 24 (Support) continued:

- 29) Support policy approach – The potential of Silverstone as a strategic employment site should be stated. The area is appropriate for accommodating high tech employment and distribution and warehousing activities.
- 30) Shortfall in office space must be addressed.
- 31) Jobs should be provided as growth in housing progresses.
- 32) Dallington Grange must form part of this development plan.
- 33) Swan Valley is a sustainable option to meet the employment non-b use targets.
- 34) Recognition of *Emergent Joint Core Strategy* not to constrain employment growth is supported.
- 35) The site at Rugby Radio Station should be considered suitable for meeting the employment growth targets of West Northamptonshire.
- 36) The *Strategic Northamptonshire Economic Action Plan (SNEAP)* figures should be included in the *Emergent Joint Core Strategy* as reference figures or targets to be monitored against housing growth to ensure sustainable development occurs.
- 37) Potential to extend current employment site at Brackmills should be considered appropriate toward meeting the requirement of the *Emergent Joint Core Strategy*.
- 38) General support for policy, non-B8 (Storage and Distribution) use development at Town Centre locations must not adversely impact on the existing built heritage of an area.
- 39) Policy approach generally supported although employment targets must be finalised within the *Core Strategy*.
- 40) Higher employment projections should be targeted within the *Emergent Joint Core Strategy* to ensure a flexible supply of land.
- 41) Timescale of employment projection should include years up to 2031, aligned with regional planning horizons and accounting for recessionary impacts.

Object

- 1) The evidence base is not in place and projections to determine the level of employment growth are inaccurate, policy approach cannot be supported.

Question 24 (Object) continued:

- 2) High housing growth combined with insufficient employment growth or expansion of low skilled low job density warehousing and distribution will result in high levels of out commuting, social decline, and will not benefit the regeneration of Northampton.
- 3) Unconvinced that initial housing growth will result in the required employment growth.
- 4) No firm plans for establishing industry.
- 5) Relocation of businesses to the area will result in relocation of existing staff and will not provide new job for resident population.
- 6) Discrepancies between job projections in *Emergent Joint Core Strategy* and the *Strategic Employment Land Assessment (SELA)* are not explained. This is fundamental to the formulation of the Strategy and it cannot be considered justified.
- 7) Failure to provide adequate infrastructure will discourage employment growth.
- 8) Existing jobs must be filled before new employment development is considered.
- 9) Policy approach does not mention the need to allocate land beyond the existing supply to accommodate employment growth.
- 10) Job provision will not be adequate for the intended level of housing growth.
- 11) Skills base in Northampton insufficient to fill high tech jobs.
- 12) Feasibility of policy approach is questioned.
- 13) Policy approach is not supported; non-service industry must be an integral part of the Strategy.
- 14) Housing growth will be needed to facilitate employment growth. Housing growth is overestimated so level of employment growth is not required.
- 15) Policy approach insufficient to meet the needs of people moved to the countryside through large scale development.
- 16) Need noise sensitive employment use in residential areas.
- 17) Employment expansion at greenfield sites is not supported.

Question 24 (Object) continued:

- 18) Use of agricultural land for employment will result in loss of farming jobs and ability to produce food locally.
- 19) Non-B employment, particularly tourism, is out of character with West Northamptonshire.
- 20) Jobs in Hospitals/School/Leisure employment will provide jobs and reduce deficiencies in these key services and facilities.
- 21) Housing development must be employment led, not vice versa.
- 22) Job growth should be directed to the North of England.
- 23) Outsourcing of jobs to cheaper labour markets internationally will result in the decline of jobs in area – this is also true for high tech industry.
- 24) Growth in green industries has not increased uniformly.
- 25) Unconstrained sites means letting developers choose where they want to locate, this is the antithesis of what Town and Country Planning was intended for.
- 26) B8 development at Brackley is resisted.
- 27) Current infrastructure is insufficient to accommodate this level of growth.
- 28) Scoring methodology for site assessment in SELA is criticised. Based on this, the policy approach to employment site provision cannot be supported.
- 29) Underestimation of jobs/floorspace ratio, this needs to be revisited as part of the Emergent Joint Core Strategy.
- 30) Future job projections must be finalised before the land is allocated for either housing or employment.
- 31) Investment in the town and promotion of the rural landscape will encourage investment in these types of employment use.
- 32) Development at Junction 16, M1 is isolated and should not be carried forward.
- 33) The availability of employment land does not necessarily indicate that the job target will be met.
- 34) More live/work opportunities need to be created.

Question 24 (Object) continued

- 35) Preferable geographical location for logistics and warehousing means Northampton will not be able to generate the need for IT and skilled jobs. This will not change with increases in population.
- 36) Employment target is incompatible with the percentage of affordable housing proposed.
- 37) Encouraging more pubs and clubs into the town centre will deter people from entering the area during the evenings.
- 38) Attracting high skilled jobs has historically been unsuccessful.
- 39) Too much office space is being provided on the edge of towns. Building to suit the potential needs of employers is opposed.
- 40) Proposed ratio of jobs per housing is too low.
- 41) Northampton will not attract the high skilled jobs proposed due to competition from more desirable locations i.e. Oxford and Cambridge.
- 42) Unlikely employment will be delivered based on Council's past adversity to business.
- 43) Decline in jobs through recession no evidence to suggest this trend will reverse.
- 44) Misguided to build new science park in the hope companies will relocate.
- 45) Policy approach not supported, it must be more targeted.
- 46) Information given under section 6.5 is inadequate and the *SELA* and *SNEAP* have not been properly considered which weaken the case for this policy approach leaving the Core Strategy open to criticism and refusal.
- 47) Closer working with Economic Development, business support and the private sector is required.
- 48) Policy approach will encourage Northampton to be a dormitory settlement and will encourage commuting to London, Birmingham and Milton Keynes.
- 49) Policy approach is not supported – provision should be over and above that prescribed in the *SELA* as many of these site may not realistically come forward which would result in a undersupply of employment land.

General Comments

- 1) Comment is dependant on rate of economic recovery.
- 2) Strong governance and management of the planning and development control process is needed to encourage a step change in the economy away from distribution and warehousing.
- 3) Preferred Options for direction of growth of Northampton is skewed to the south and toward Junction 16, M1.
- 4) Current and projected shortfall in the availability of large employment sites.
- 5) Do not agree with external influence.
- 6) Decline in the industrial sector is not acknowledged in the Councils' response to the Draft *SELA*. This trend must be reflected in the Core Strategy.
- 7) The Strategy must seek to encourage academic and commercial (B1b) research and development activities.
- 8) Strategy must define the sectors within which these jobs will be created.
- 9) Support implementation of mass monorail/tram system in Northampton.
- 10) Policy approach is not understood.
- 11) Specialism in certain industry sectors will be critical to creating identity in the area.
- 12) Development should be focused on regeneration of Northampton Town Centre.
- 13) The protection of rural areas is not mentioned once within the document.
- 14) Existing capacity and available land must be assessed.
- 15) Incentives should not exclude existing available employment sites.
- 16) Economic downturn has highlighted the vulnerability of certain industries the viability of significant employment growth must be tested.
- 17) Shoe and boot manufacturing base deserves recognition within the Strategy.
- 18) Travel plans and training of local labour for work in new employment developments is required.

Question 24 (General Comments) continued:

- 19) Proposals may result in increased out-commuting to Milton Keynes and London.
- 20) Sale of British companies to foreign owners will have a serious knock on effect to the economy.
- 21) Encourage employment uses in Northampton that will reduce the freight lorries cutting through the town.
- 22) All B8 development should be directed to Daventry International Rail Freight Terminal (DIRFT) or strategic locations that do not impact on residential communities. DIRFT's weight as a cross regional and national resource in the Strategy underplays its significance for the West Northamptonshire.
- 23) Secure parking should be provided at B8 facilities to limit lorry over night stays in lay-bys.
- 24) Younger people should be encouraged to work.
- 25) Comments cannot be made with insufficient detail regarding the base line conditions and potential for significant change in policy.
- 26) Right reserved to comment when future employment growth is up-to-date and precisely defined.
- 27) Breakdown of employment sectors, changes to sectors, and changes in work patterns should form part of the Strategy.
- 28) Employment projections must be based on strategic Northamptonshire Economic Action Plan (SNEAP) preferred policy scenario not the Regional Spatial Strategy value.
- 29) Some current employment designations may be no longer suitable for those uses and should be considered for housing redevelopment.
- 30) Growth of engineering sector should be encouraged.
- 31) Unemployment is already high in Northampton and it is unclear where new residents will work.
- 32) Creative and culture industry is encouraged.
- 33) Employers should be incentivised / forced to make effort to improve in terms of climate change and health.
- 34) Concerns regarding funding are raised.

Question 24 (General Comments) continued:

- 35) Job supply should not outstrip the expansion of the local economy.
- 36) The rejection of "Daventry Option 3 (Daventry North West) is rejected. This option for growth to the north and west will support the growth at DIRFT.
- 37) Linkages between heritage assets, regeneration and employment growth in town centres requires consideration.
- 38) Concerns raised regarding the environmental impact of DIRFT.
- 39) If Non-B uses in Northamptonshire do not keep up with national trends, the employment uses within the plan need to be reconsidered.
- 40) Policy does not account for levels of migration to and from the area.
- 41) Influence of the rural economy has not been considered. Rural employment is not included in the percentage breakdown of current employment.
- 42) Figures requested indicating the number of people employed per square foot of employment space, and the numbers of people who live and are employed in the sub region.
- 43) Section is confusing to the lay person and must be simplified.
- 44) Small and starter businesses are key to the economy of Northampton and should be recognised by the Strategy.
- 45) The jobs offered in the proposal are not sustainable.
- 46) The unoccupied employment land / and vacant units must be filled prior to the allocation of new land.
- 47) Where are these jobs coming from?
- 48) Consultation with key land owners will ensure plans do not impact negatively upon development proposals.
- 49) Skills base must be improved throughout West Northamptonshire.
- 50) Housing growth has outstripped employment growth leaving a deficiency in employment opportunities.
- 51) Potential employment land is capable of meeting the current shortfall but will result in insufficient employment land to meet future demand.
- 52) Fire safety measures must be fitted to all new commercial buildings.

Question 24 (General Comments) continued:

- 53) The employment growth projections in *Emergent Joint Core Strategy* are essential to meet the demand over the plan period.
 - 54) No mention within the document of communications/technology related infrastructure – this will be a critical sector of growth if West Northamptonshire is to attract high tech business to the area.
 - 55) Employment growth should not be to the detriment of the local environs.
 - 56) Para 6.2.2 recognises that Sustainable Urban Extensions will be mixed use development. Contrary to this statement table 6.4 highlights that at a number of the extensions offer zero job potential.
 - 57) Allocation of Junction 16, M1 will impact the remainder of West Northamptonshire in terms of increasing the catchment area, impact on existing centres and provision of developer contributions.
 - 58) Encouraging home working should be considered in the Strategy.
 - 59) Employment above that within the Regional Spatial Strategy is not accepted as this will impact on the employment aspirations for North Northamptonshire.
 - 60) Instability in financial sector must be acknowledged in the strategy.
 - 61) Support for priority sectors for growth (table 6.3) - detail must be provided to establish how assistance will be provided for these types of business.
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Question 25

Question – Do you support the policy approach for locations of employment growth?

Summary of Key Points Raised in the Responses:

Support

- 1) The vision contained will encourage job provision.
- 2) Present locations and type of employment are damaging the appeal of the town and displacing opportunities for highly skilled employment.
- 3) Support for the policy approach, providing any necessary improvements to infrastructure are made beforehand.
- 4) Support for the University as a focus for high-tech employment and the preference for density/quality employment, rather than warehousing.
- 5) Support for the identification of a preferred location for strategic distribution, as advised in policy 21 of the *Regional Spatial Strategy (RSS)* and references to support development at Silverstone including employment, tourism and leisure uses and an education campus.
- 6) Encouraging more employment in Northampton will help to revitalise the community. Northampton City Centre is an important employment area and its full potential needs to be realised to avoid employment opportunities increasingly being provided at less sustainable fringe locations.
- 7) Support is given to the protection of manufacturing sites proposed.
- 8) Support for the further expansion of Daventry International Rail Freight Terminal (DIRFT), provided it is coupled with a commensurate upgrade of infrastructure.
- 9) Inclusion of the need to support Non B (commonly defined as including retail, tourism, leisure education, and health) commercial space is supported. These uses play a vital support role for B class uses.
- 10) This policy approach is a sensible one with the creation of employment abutting existing employment areas and substantial areas in the South East and at Junction 16, M1.
- 11) Locating employment growth in urban centres and key strategic employment locations is supported, as is the focus on knowledge-based and high technology uses.

Question 25 (Support) continued:

- 12) Development of existing “Hubs” concentrates resources more effectively.
- 13) The classification of South East Northampton as a Strategic Employment Area is appropriate, given its location and existing road and utilities infrastructure.
- 14) The support for storage and distribution uses is appropriate. This protects existing employment sites and ensures that there is scope for further storage and distribution uses in appropriate locations in the future. It is also supported by Key Policy 2 of *East Midlands Development Agencies Regional Freight Strategy*.
- 15) The scale and density of different types of employment development are consistent with other county and regional employment land studies.

Object

- 1) The strategic value of DIRFT is underplayed as a cross-regional resource, equally serving the West and East Midlands. A fuller reference in the Joint Core Strategy to the role of DIRFT in serving the West Midlands would further strengthen DIRFT’s strategic importance and fully recognise the linkages at sub-regional and regional levels.
- 2) There are no constraints (e.g. flood risk, utilities provision, transport, landscape and visual impact, noise and air quality) preventing its development.
- 3) The focus on DIRFT is premature and should await completion of a *Route Utilisation Strategy* and *Rail Freight Study*.
- 4) The *East Midlands Strategic Distribution Study* indicates that a new rail and non-rail connected site will be needed in addition to DIRFT.
- 5) Housing needs to be built around the DIRFT site to support its expansion. This is not provided for under the spatial strategy chosen.
- 6) References to the Northampton Freight Study and Route Utilisation Strategy should be removed as they are not relevant to the West Northamptonshire area.
- 7) Development at Northampton North is not necessarily required to fulfil the aim of fostering specialist business clusters associated with the University. The use of communication technology means that the development of “clusters” is not dependent on physical proximity to the “hub”.

Question 25 (Object) continued:

- 8) No more areas for storage and distribution (i.e. B8) land use should be allowed or the focus on it reconsidered given present levels of traffic generation and the displacement of high tech/skilled employment.
- 9) Warehousing and distribution damages the appeal and visual amenity of the area, has a low employment density and is therefore an inefficient use of resources.
- 10) Northampton can never become a city and compete with Milton Keynes nor can it accommodate high tech businesses to compete with Cambridge. A more realistic locally based and specialised approach is advocated to the development of the local economy. The key features of this approach would be promoting cultural and creative industries; investment in marketing; reawakening a sense of history; taking advantage of the river and waterfront setting and looking for specialisation and niche industries.
- 11) Extension of employment development towards the M40 is not supported due to its impact on the countryside.
- 12) The text should acknowledge the economic down turn. The economic downturn may mean that less employment land is needed than is proposed.
- 13) The proposed employment site at Junction 16, M1 would draw investment and employment opportunities away from Daventry harming the town's regeneration and development. Consideration should be given to meeting this employment need at other locations such as DIRFT and urban extensions.
- 14) Junction 16, M1 has better connections with Leicestershire, Warwickshire and Buckinghamshire than Northampton.
- 15) Development at Junction 16, M1 is at odds with the said intention of focussing employment development on urban centres.
- 16) Development at Junction 16, M1 is not supported by the *Northamptonshire Strategic Employment Land Assessment (SELA)*.
- 17) Junction 15a, M1 which is fed by M1/ A43 should be used instead of Junction 16, M1. If a new railway station was built in this area, it would be a means of travel to work and would also be encouraging for London business into this area. It would also be closer to proposed development to the south and west of Northampton than Junction 16, M1. Development around Junction 15a, M1 is also consistent with the Northampton Local Plan.

Question 25 (Object) continued:

- 18) Mention should specifically be made of Weedon Depot and its regeneration.
- 19) Expansion of DIRFT and Silverstone may adversely affect the historic environment.
- 20) Whilst the strategy proposes to locate offices and factories in the urban extension, most people do not wish to live near offices and factories. Even if people are obliged to live near their place of employment, most people would not choose to walk or cycle and will continue to use their cars, even over short distances.
- 21) The assumptions about job growth may not materialise and the assumption that “if you build the houses, the people and jobs will come” is flawed. Even if the projections do prove correct, the growth in jobs will not fulfil the needs of the new residents that would be moved into the County if massive residential development on the scale planned takes place.
- 22) The *Emergent Joint Core Strategy* needs to provide a clear policy framework, by which to enable the provision of employment opportunities within the town centre so that employment growth is achieved. These policies must be aligned to the Central Area Action Plan.
- 23) There is insufficient detail in the Emergent Joint Core Strategy on the location of employment land in growth areas.
- 24) There is insufficient/incomplete evidence for the employment growth areas selected.
- 25) More detail needs to be provided on the overall level of planned employment growth for West Northamptonshire. West Northamptonshire has the potential to support 68,119 to 2026 and 81,743 to 2031. These figures should be considered for inclusion either as reference values or targets and monitored against housing growth to ensure a sustainable balance.
- 26) Do not support the policy approach for location of employment growth as the policy provides employment at DIRFT, Towcester, Brackley and Silverstone, but only 3,040 jobs for the Northampton expansion.
- 27) More weight needs to be given to strengthening the town of Towcester and Brackley as well as Daventry and their rural hinterland, based on evidence in the *Towcester Masterplan* and the Interim Rural Housing Policy.

Question 25 (Object) continued:

- 28) Clarification is needed in relation to there being a large demand for B8 (Storage and Distribution) uses, as it is considered that this is only the case in Northampton and Daventry. Towcester and Brackley should be promoted for B1 & B2 uses, which would be consistent with the *SELA*.
- 29) This section should be strengthened to outline in more detail what the current employment situation across the Sub-Region actually is, what the full breakdown of sectors in each district is and as a whole across west Northamptonshire, how this is expected to change, with increased levels of self employment, home working, retail and leisure working.
- 30) More reference is needed to the Silverstone Circuit including links to Brackley as well as Towcester and a clearer statement of the aims of the circuit being to build on the regular events that currently take place at the circuit on an annual and regular basis to maximize local expenditure and its local, regional and national role.
- 31) Silverstone Circuit should be allocated strategically. This approach would be consistent with the approach taken by Aylesbury Vale District Council and the potential number of jobs development at this site will generate.
- 32) Development of Silverstone Circuit may have adverse effects on the wider historic landscape, particularly upon the setting of Stowe.
- 33) There is a growing demand on farmers to produce more food and this in itself would provide employment and result in the retention of a productive greenbelt.
- 34) The natural expansion of companies in and around Northampton will provide the extra jobs, not the approach stated.
- 35) This policy is too bland and makes no mention of the significant amount of empty business and industrial premises that exist.
- 36) More encouragement for high value and highly skilled jobs is needed.
- 37) The level of employment proposed will result in more traffic congestion.
- 38) Northampton does not have the education sector to support highly skilled jobs, like those advocated.
- 39) The proposed employment areas will exacerbate and/or are located within areas of high flood risk.
- 40) The idea that land allocations will somehow encourage high technology and knowledge based employment is ludicrous. Investment in the town and promotion of the rural landscape would be more effective.

Question 25 (Object) continued:

- 41) No attention is given to development of tourism as an employment use.
- 42) More flexibility is needed in the policy approach taken by encouraging employment across all employment uses, rather than to those specifically mentioned. This would strengthen the economic base for West Northamptonshire by increasing its diversity.
- 43) The policy approach needs to ensure that offices are not restricted to town centres.
- 44) The policy approach and/or key diagram is unclear and lacks specific detail.
- 45) More guidance is needed on how West Northamptonshire will attract employers from outside the area.
- 46) Support needs to be given to small rural employment opportunities and home working.
- 47) No further employment land should be provided as there are many existing empty employment sites.
- 48) The level of employment land proposed will overwhelm and destroy the character of existing villages.
- 49) Employment growth in urban centres should specifically include mixed use developments.
- 50) The specification of a preference toward high technology and knowledge based industries is an inappropriate level of detail to include in a Core Strategy.
- 51) As per PPS4: *Planning Policy Statement 4: Planning for Sustainable Economic Growth*, existing site allocations should not simply be “rolled over”. The preference indicated toward protection of existing manufacturing sites is contrary to this.
- 52) The ProLogis sites in Daventry should be made strategic allocations.
- 53) Nortoft Farm should be made a strategic site as part of DIRFT due to its proximity to rail lines, road and labour, as well as demand from the logistics industry. This site is also not located within or close to any significant environmental designations.

Question 25 (Object) continued:

- 54) Existing low amenity uses, like heavy factories, need to be protected from more sensitive uses like residential. Similarly, distribution uses should be located away from urban centres and residential areas due to the heavy traffic levels they generate. This needs to be addressed in this section.
- 55) Housing and employment growth must occur in tandem to ensure there isn't a disparity in homes and jobs. This needs to be referenced in these policies.
- 56) Ten hectares of employment land should be allocated at Daventry South East and the employment allocation at Daventry North East deleted or reduced. The Commercial Property and Employment Land Study (*COPELA*) and *Strategic Employment Land Assessment (SELA)* studies, as well as the *Daventry Masterplan* recognise this sites importance. Ignoring these items of evidence would therefore bring into question the justification for the allocation and Daventry North East and therefore the soundness of the Emergent Joint Core Strategy.
- 57) The estimate of 2,129 jobs for Daventry North East shown in Table 6.4, significantly exceeds the combined total put forward as part of the 'Monksmoor' and 'Church Fields proposals.
- 58) A greater proportion of jobs (i.e. 7000) should be allocated to Northampton North. The preference to allocations to the south and south east will result in an unsustainable pattern of development, will strain transport infrastructure, prejudice the Northern Arc and market city initiatives. Furthermore, this allocation is not justified by *SELA* and therefore brings into question the soundness of the Emergent Joint Core Strategy.
- 59) The importance of the Brackmills employment area needs to be noted given its potential as a Strategic Employment Location.

General Comments

- 1) Consideration should be given to ensuring adequate public and private transport infrastructure for employment uses in all locations.
- 2) This section of the *Emergent Joint Core Strategy* is difficult to understand.
- 3) Policy must be sufficiently flexible and demand led to allow businesses to be responsive to emerging opportunities for development, rather than being forced to relocate.

Question 25 (General Comments) Continued:

- 4) The priority sector for the growth of tourism should be linked to leisure and sport, which is one of the County's under-exploited strengths.
 - 5) Technology transfer and development activities located proximal to institutions would provide an opportunity for the development of a sub-regional centre.
 - 6) Free enterprise requires a well planned and on time delivery of sites plus connectivity.
 - 7) Weedon Depot is a prime example of a lost development opportunity.
 - 8) Park and ride facilities should be provided outside Northampton so that parking at employment sites is not required for all employees.
 - 9) Dallington Grange needs to be delivered as a priority during the plan period. It has the potential to attract a range of occupiers and uses and will benefit from an important section of the North West Bypass to be constructed.
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Question 26

Question – Do you support the policy approach towards Sustainable Transport?

Summary of Key Points Raised in the Responses:

Support

- 1) Sustainable transport is much needed.
- 2) This is very important; transport needs a thorough overhaul.
- 3) Sustainable transport will improve the environment, the economy and reduce emissions.
- 4) Support the encouragement of sustainable transport and suggest that reference to Green Travel Plans is included.
- 5) Existing transport routes should be improved rather than building new ones.
- 6) Support the aim of using existing networks and building new roads only as a last resort.
- 7) We support the need to shift transport investment away from road building and to other modes.
- 8) Need to make best use of existing infrastructure to enable phased release of new development and enhanced public transport measures.
- 9) The delivery of strategic highway improvements such as the Flore / Weedon bypass, the new A45/M1 link road, and the Towcester bypass, is advocated.
- 10) The concept is supported, but not at the expense of concreting everywhere to achieve it.
- 11) Gas fuelled buses are sound. Generally the services are clean and on time and link Northampton to Wellingborough and Kettering effectively.
- 12) There is potential to fuel vehicles using renewable plant oils and other technologies.
- 13) *“By developing employment centres near to new and existing homes, travel needs will be reduced. Proposals for Catch Yard Farm are in conformity with this objective”.*

Question 26 (Support) continued

- 14) Location is an important factor, and even the earliest settlers understood this.
- 15) Many of these issues would be addressed by concentration on high quality/ high density housing close to the centre of Northampton.
- 16) Need to consider the wider links outside of West Northamptonshire, including by rail.
- 17) Long Buckby is the only village in the area with a rail station and development here would make use of existing networks.
- 18) At present, other than the Kettering-Wellingborough line and the Northampton-Long Buckby Line all other public transport trips in the area must be made by road. The Joint Core Strategy is right in identifying that the major growth in future trips will be local.
- 19) There are some connections missing, especially between villages. For example between Byfield and Woodford Halse and once you leave the village you are forced to walk on unsuitable grass verges or the road.
- 20) Better public transport is needed in rural areas e.g. evening transport between Sixfields and Daventry including the villages in between.
- 21) It should state that where new roads and junction improvements are being built then a new cycleway should be built alongside on all cases.
- 22) New urban extensions will have the potential to assist modal shift by encouraging public transport and providing safe routes for pedestrians and cyclists.
- 23) There is strong local support for walkways and cycleways, but no funding to provide them. Safe routes should be provided as part of all new development.
- 24) Should be creative in how to overcome the drawbacks of public transport- i.e. car pools. You should also allow for some car use to avoid other problems, such as preventing economic investment.
- 25) *"This requires trams into and from Northampton"*.
- 26) Support the approach for central Northampton, but it must be acknowledged that some will still need the choice of using the motor car.
- 27) Should be achieved by providing good services that people will use rather than trying to force people onto public transport by restricting car parking.

Question 26 (Support) continued

- 28) Support, but would add the following point to paragraph 6.6.4 *“Effective integrated route planning and accessible timetables and other travel information including real time information.”* Car sharing could also be included.
- 29) Support, but only if it includes town park and ride.
- 30) Support, but better road access is also needed to Northampton Town Centre from the north (Kingsthorpe).
- 31) Dedicated school transport could prevent congestion and parking problems associated with the ‘school run’.
- 32) Community services need to be located so that walking and cycling are seen as reasonable alternatives to access them.
- 33) Support, but sceptical about developers providing this.
- 34) The network of existing district centres such the Mereway District Centre should be retained in order to protect the existing transport investment.
- 35) There are particular opportunities to support cycling and walking to the north of Towcester.
- 36) Support the broad principles, but question whether the new A45/M1 link road is needed. Modelling work undertaken to support the ‘*Preston Green*’ proposals suggests that this road is not required to support development in this area. Improvements to the local road network and the links to the town centre would be sufficient (and preferable) to support the Northampton South East development.
- 37) Support public transport focussed on employment clusters near centres of education.
- 38) The delivery of growth at nodal points such as motorway junctions and railheads has the benefit of limiting the impact of freight movements on existing communities.
- 39) The health and wellbeing benefits of cycling and walking are noted.
- 40) Support, but the scale of growth around Northampton is such that new road infrastructure will be needed.
- 41) For Great Houghton, the provision of quality public transport would satisfy a long standing need appropriate for those without cars.
- 42) The northern node centred on Great Houghton is of particular importance for achieving the rapid transport link.

Object

- 1) Sustainable transport cannot be delivered in Northampton until the local areas have improved local road networks.
- 2) You cannot disinvest the car. They will always be needed for the rural areas. The car is the only feasible method of transport for many journeys and should be given priority.
- 3) The expectations of being able to alter travel behaviour are unrealistic- people will continue to rely on cars as the preferred method of transport. The climate does not support cycling and walking. Planners have their heads in the clouds.
- 4) Modal shift has not been successful in the UK, so it is questioned why it will be successful in Northampton.
- 5) This approach is unrealistic without an extensive underground transport system.
- 6) The necessary infrastructure has to be in place to support the strategy.
- 7) The policy convinces us that the plan does not understand the need for the scale of improvements and additions that will be needed to support the size of the proposed development.
- 8) It would be a better use of money to bypass Olney on the A508, rather than build this [the A45/M1 Link] road.
- 9) National guidance does not suite rural communities on this issue; a sensible approach is required to development in rural areas that does not insist on public transport access.
- 10) The approach is contradictory; you cannot promote the use of public transport on the one hand and then plan to build a huge trunk road.
- 11) These are aspirations, not policies.
- 12) Development should not be in new compact areas with new infrastructure, rather it should be sited close to existing infrastructure.
- 13) Improved public transport in existing areas is key and this requires a reversal of recent approaches by all public bodies; there has to be viable alternatives in place before changes in behaviour will start.
- 14) Interaction between new development and surrounding urban areas is largely ignores- the existence of Market Harborough is not mentioned.

Question 26 (Object) continued

- 15) Public transport provision is okay, but does not go far enough to be a strategy.
- 16) The road networks are not viable and cannot take additional traffic.
- 17) Castle Station is not adequate/ fit for purpose.
- 18) Rail charges are already too high.
- 19) At present it costs more to use the bus to and from work, as well as taking longer than driving. The bus system needs re-evaluating and cost needs to be reduced to make it attractive.
- 20) All who come to live here will be permanent car users and indifferent bus services.
- 21) No mention is made of electric technology. The provision of electric car charging points should be included in the plan.
- 22) No real mention of rail transport. The Northampton Bedford line could be re-opened with a station for 'Riverside' [Nunn Mills Road] and Great Houghton, which would serve the new development area.
- 23) Objections to the link road between the A45 and M1 Link Road including:
 - Lack of evidence to support it;
 - Contrary to all current policies regarding climate change;
 - Increased carbon emissions in construction and use;
 - Destruction of rural communities and the countryside;
 - Devaluation of property;
 - Adverse environmental impact;
 - The road will exacerbate problems of pollution (noise and air);
 - Problems with flooding on the route and the increased risk following construction;
 - Lack of clarity about its role i.e. is it for through traffic or local traffic;
 - The position of the Highways Agency and the County Council regarding the link road;
 - The relocation of the junction on the M1 will move the congestion rather than solve it;
 - Damage to businesses in Grange Park
 - Unrelated to the housing needs of Northampton;
 - Current problems are largely due to local traffic and junction capacity;
 - Inconsistent with the modal shift objective;
 - Encouragement of further logistics development on which the town is over reliant;
 - Financial cost and who will pay;

Question 26 (Object) continued

- The funds should be used for greener initiatives / public transport (especially rail links).
- 24) Public transport links to London e.g. the rail connections are poor, and the JPU have no power to improve this.
- 25) Significant modal shift is unlikely and the plan to build Sustainable Urban Extensions (SUEs) will just create further congestion.
- 26) To be successful in the global/national economy the area needs investment in an airport and improved rail links.
- 27) An additional sub paragraph should be included to state: '*To promote additional storage and distribution development in locations that maximise the potential for the transfer of freight from road to rail.*' The expansion at the Daventry International Rail Freight Terminal (DIRFT) would accord with this approach.
- 28) There is a lack of detail as to what transport measures are envisaged and how they will support the delivery of the planned urban extensions e.g. the absence of any proposal for a rapid transit link to the Northampton South Sustainable Urban Extension (SUE).
- 29) This is an attempt by the Joint Planning Unit (JPU) to railroad through a dramatic and arbitrary change as a desperate measure promoted by developers.
- 30) Cannot accept the policy approach as the overall strategy will not support the development of compact centres, public transport is not flexible (e.g. for shift work), and the provision of homes is not matched by the provision of jobs.

General Comments

- 1) What is "*sustainable transport*"?
- 2) The so called cycle routes in and around Northampton are abysmal, with parts closed off, obstructions left un-removed for months and no warning signs. The cycle lanes on the roads are barely wide enough to allow lorries to pass each other and have pot holes and depressed drain covers which are dangerous.
- 3) This transport needs to be practically timed and charged.
- 4) No mention is given to entrepreneurial initiatives in transport provision; this should be added to the strategy.

Question 26 - (General Comments) continued

- 5) One policy does not fit all, especially if rural areas are concerned.
- 6) Insufficient evidence is given to ensure that developers will adequately support the infrastructure needed. A more robust approach to the provision of infrastructure is required.
- 7) How will employees get to Junction 16, M1 unless they have a car or live in the area.
- 8) Northampton needs a ring road to take through-traffic, an orbital bus route and an improved rail service.
- 9) Without clear knowledge of existing road networks across Northampton, how can the Core Strategy address the issue of current congestion and the requirements for new road infrastructure?
- 10) The wording is too technical and suggests that building new network roads is the last resort.
- 11) We are concerned that the understandable drive towards public transport will lead the plan to recommend no development in the rural areas will be permitted unless connected to a bus network. This would mean that development, especially farm diversification, would not be possible and therefore the policy needs to be sensible.
- 12) It is unclear why no mention is made of the need to address the impact of growth on the A508 between Northampton and Milton Keynes.
- 13) The role of the A43 has not been mentioned in enough detail. The overall cumulative impact can be expected to be significant, and a study of the future transport needs in this corridor should be undertaken.
- 14) The impact of High Speed 2 (HS2) will need to be considered as proposals emerge in the months ahead.
- 15) The longer-term proposals for the A45, including the Flore/Weedon Bypass are not discussed, and to west of Daventry are not discussed. This is a particular concern given the growth planned for Daventry.
- 16) Due to the present design of M1 Junctions 17 and 19, traffic is prevented from going north on the M1 to reach the A14 at Catthorpe.
- 17) There is no where on the A508 where Heavy Goods Vehicles (HGVs) can pull in to let traffic past.

Question 26 (General Comments) continued

- 18) The Strategy needs to include a policy whereby old railway routes can be examined with regard to removing HGV traffic from the road.
- 19) Should investigate rail based transport between Northampton and Bedford, via Olney.
- 20) The present road layout creates gridlock in the [Northampton] town centre.
- 21) The absence of affordable parking is causing the commercial centre to decline.
- 22) From Pitsford and Brixworth, a trip to the town centre can take an hour, resulting in the surrounding villages being used as rat runs.
- 23) In Kingsthorpe's immediate vicinity, there are three or four of the worst congested junctions in Northampton. This 'bottle-neck' needs to be improved. Great care will be needed in planning public transport to serve development to the north-west of the town.
- 24) The transport strategy must not hinder or prevent development at strategic employment sites; otherwise their economic value may be undermined.
- 25) *"Traffic through Rowtree Road is vey busy and it often takes me 30 minutes to drive my daughter to school."*
- 26) We should provide a National Express Coach Station on the edge of Grange Park as coaches pass Northampton on the M1 every few minutes and it would be an asset for the people of Northampton to be able to travel to London and other areas of the country without having to rely on trains.
- 27) Concern over the routes of new transport links on the historic environment and archaeology.
- 28) The wider strategy is reliant on road transport. Northampton should lead the way in developing visionary new transport systems.
- 29) The overall growth plans will not reduce commuting but will encourage more as the ratio of homes to jobs is too high.
- 30) Providing jobs and houses out of town will not encourage travel to the town centre.
- 31) A variety of concerns raised about existing roads i.e. poorly maintained, over-capacity, dangerous, poor air quality (e.g. Weedon) and poor drainage causing flooding.

Question 26 (General Comments) continued

- 32) As a new railway [HS2] is being built from London to Glasgow through Buckinghamshire and Oxfordshire, houses should be built near this route to reduce car use.
- 33) The A509 from Wellingborough to M1 Junction 14, could be improved and include a bypass to Olney. Failure to consider this option is inexplicable.
- 34) Need to improve public transport, particularly rail connections in order to bring Northampton town centre to life.
- 35) Judgement is reserved until the situation regarding the primary road network between Daventry and Northampton is resolved. This is crucial to the growth of Daventry and protecting the rural area.
- 36) Public transport does not work well in a large predominantly rural county.
- 37) The approach is fine in principle but will require huge investment to create radical new infrastructure such as a tram system. Traditional road building will not work.
- 38) Park and Ride bus options have a role but only as part of a means of changing attitudes and behaviour.
- 39) Targeting the issue of taking children to school would be very effective.
- 40) Much work is needed to encourage and educate others that there are genuine and attractive alternatives to the car.
- 41) Northampton is unfriendly and uninviting to visitors with poor, uncompetitive parking provision compared to other places such as Milton Keynes.
- 42) Concern that the new A45 and the increased traffic will impact on the village of Cogenhoe.
- 43) The policy should be reinforced by clear targets for modal shift based on the County Council's Transport Strategy for Growth i.e. a 20% reduction in the modal share for car use in new development, 5% overall over a 10 year period.
- 44) The word '*existing*' should be deleted from 6.6.4 (1) and 6.6.4 (2) as it is potentially counter-productive and limits the scope of what could be achieved.
- 45) There should be recognition of the potential for new and innovative public transport provision over the pan period.

Question 26 (General Comments) continued

- 46) A route for restoring the rail connection between Northampton and the Midland Main Line (i.e. Northampton – Bedford) should be safeguarded.
- 47) The policy may be applicable to Northampton, but not elsewhere.
- 48) Detailed traffic impact assessments are required for all major and minor developments.
- 49) Policy needs to adopt a realistic approach to car parking and ensure that sufficient provision is made on new developments, such as short term parking for shoppers.
- 50) The viability of orbital bus routes are questioned. Such services will not be operated on a commercial basis in Northampton.
- 51) The Core Strategy needs to identify how the transport infrastructure will be provided, and how the locations of growth will be integrated into the town centre. Access to the centre of Northampton is a priority to support regeneration.
- 52) A range of problems using cycle route 6 into Northampton are highlighted including, growth of traffic, increase in HGVs, danger to cyclists caused by overtaking, increase in accidents/fatalities, poor maintenance. This route needs to be improved by putting in a dedicated cycle route.
- 53) Strategic improvements are required particularly in rural areas to enable equal access to employment and services.
- 54) The Grosvenor Centre development in Northampton will improve the public transport network.
- 55) The identification of public transport priority areas needs to be done in consultation with landowners and other stakeholders.
- 56) The rapid transit route to Northampton should not share space with road traffic and should be designed so that it can be converted to a tramway. It should also be extended to Grange Park and M1 Junction 15.
- 57) The preferred lorry routes of the A428 and the A508 should be reinforced.
- 58) The use of the A5199 should be restricted and the restrictions enforced.
- 59) The policy should promote links to Wellingborough and North Northamptonshire.

Question 26 (General Comments) continued

- 60) Northampton South East provides the best opportunity to promote sustainable travel, but there needs to be a clear infrastructure delivery plan which identifies funding form sources other than developer contributions.
 - 61) Close working is required with the North Northants Joint Planning Unit and other agencies to ensure a consistent approach to transport infrastructure across Northamptonshire. The capacity of the A45 is a key issue in this respect.
 - 62) The existing infrastructure, i.e. road and rail links are already congested and overstretched.
 - 63) Incorporate existing footpaths and cycle routes into development areas.
 - 64) Further work is required on the following matters to develop a sound plan:
 - Further testing of transport impacts of growth options
 - Investigate the sustainability of growth options
 - Reassess transport strategies including sustainable transport measures
 - Consider funding and deliverability of transport infrastructure.
 - Particular attention needs to be paid to the development options to the south and south east of Northampton, and the A45-M1 link road.
 - The County Council needs to prioritise its work to support the Core Strategy, in particular the transport modelling work.
 - The strategy needs to consider a range of multi-modal options to establish the most sustainable pattern of growth across the area.
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Question 27

Question – Do you support the development of the Preferred Option 'Northampton North'?

Summary of Key Points Raised in the Responses:

Support

- 1) The proposal is logical, sustainable and has good connections.
- 2) This will be of benefit to Northampton. It is considered that the University Arc and the Technology Realm will help to provide quality jobs and a more sustainable approach to development.
- 3) Development around the edge of the Moulton College estate would lead to 100% of funding generated being reinvested into education and employment.
- 4) This is the most sustainable of the options due to its proximity to educational and employment opportunities and makes the best use of brownfield sites with the least impact on agricultural land.
- 5) Compared to the other urban extensions, North Northampton is largely free of flood risk and its highway network can be more easily upgraded.
- 6) This option will enhance deprived areas in the locality.
- 7) If fully developed, this option would reduce demand to develop Northampton South East.
- 8) The proposed development is located between Moulton and Overstone on the A43 and will therefore not ruin the character of these areas.
- 9) Development in this location will discourage dormitory commuting, particularly to Milton Keynes, thus keeping the workforce in Northampton.
- 10) The area of green belt in this area is already compromised and it would be sensible to develop this area, rather than more pristine areas.
- 11) This option reflects the spatial strategy advocated in the East Midlands Regional Plan.

Object

- 1) The proposals will result in the coalescence of the villages of Moulton, Boughton and Overstone-Sywell. Maintenance of a strategic gap between Northampton and these villages would address this issue.

Question 27 (Object) continued:

- 2) The case for locating employment in close proximity to the University is not convincing. Furthermore, the university has little land to expand. Although, Moulton College has a large amount of land, this is largely inaccessible.
- 3) Growth should be focussed on brownfield sites, not urban extensions into green field sites.
- 4) The infrastructure provision associated with this extension is uncertain and theoretical. Public and private transportation links; utilities (including broadband), schools, doctors, dentists, hospitals, green space, leisure facilities and policing all need to be provided and/or investigated further before this level of development is committed to.
- 5) Developers will not put adequate infrastructure in place to accommodate this development. Furthermore, the government and local councils cannot afford to pay for this infrastructure given the state of the economy. As over four times as much housing is also proposed in the south east of Northampton, money that would be put towards this infrastructure will likely be diverted elsewhere.
- 6) This proposed growth will adversely impact on existing communities.
- 7) It would be desirable to keep the urban development of Northampton to the Northampton side of the M1. The opportunity to complete a ring road around the town appears to have been missed and access to the town centre is unsatisfactory.
- 8) This option is disconnected from Northampton Town Centre.
- 9) It is not clear how the Northampton North Option will deliver reduced levels of deprivation and aid in regeneration. Regeneration of existing parts of Northampton could occur and would reduce the level of green field land that would need to be developed.
- 10) This area is in a floodplain and development will exacerbate existing flooding. Whilst the Moulton and Overstone area is not in the floodplain for the Nene, run-off would feed into the surface water drainage system that flows into the Billing Brook. The stream running behind Crabb Tree Drive (Northampton) is prone to flooding. The Northampton North area drains into this stream. Furthermore, there is no evidence that the potential for flood risk can be mitigated by Sustainable urban Drainage Systems (SuDS).
- 11) People will not live and work in the same area, as suggested.

Question 27 (Object) continued

- 12) The proposal will build over good arable farmland that should be protected. This land will be needed as world population increases and global warming reduces food productivity.
- 13) The proposed development will result in high level of noise, dust, lighting and traffic that will adversely affect the amenity of persons living in this area and new realignment of roads associated with the development, such as the A43, will result in noise and traffic that would adversely affect the amenity of existing residential areas. Noise from new industrial units will have a similar effect.
- 14) There are already more than 5000 unoccupied homes in Northampton. There is no need to construct more.
- 15) There are several archaeological sites in this area that would be disturbed by the proposed development.
- 16) Building industrial units, as suggested, does not create jobs. Only companies can do that. Furthermore, there is a glut of unoccupied industrial units in this area.
- 17) This urban extension would be detrimental to an identified attractive landscape in this area, for both local and future residents, when seen from roads into Northampton. This landscape has been designated medium to high value in studies commissioned by the Joint Planning Unit and should not be developed.
- 18) The proposed development would result in increased traffic levels on already substandard and congested roads. These traffic levels would also compromise safety for pedestrians and property.
- 19) There is much wildlife in this area that would be adversely impacted by the proposed development. Similarly, the development would reduce biodiversity.
- 20) Not enough jobs will be provided within this extension.
- 21) This development is completely foreign to the neighbourhood.
- 22) Realignment of the A43 would be an inefficient use of land. Furthermore, the A43 would need to be made into a dual carriageway to provide capacity for existing development, let alone that proposed.
- 23) The cost of this development is huge and cannot be afforded by the government in its present fiscal state. Furthermore, it would be unfair to saddle future generations with the tax burden of this development.

Question 27 (Object) continued

- 24) The projections this urban extension is based on are outdated and inaccurate. The Barker review has been discredited. Similarly, the RSS figures are under review. As such, the presumption behind this urban extension is flawed.
- 25) Past experience indicates that insufficient infrastructure will be built and the homes constructed will be of a poor quality.
- 26) Development will spoil the setting and character of villages in this locality.
- 27) There are high voltage power lines and large gas pipelines located in this area that would conflict with housing development.
- 28) Development of two extensions to the villages of Moulton and Overstone, rather than a ribbon development as proposed, would be more suitable.
- 29) Road conditions are already beyond capacity and unsafe. In particular, Billing Road, and its intersections; the roundabouts at Round Spinney, Lumbertubs Pub and St Gregory Road; the main road through existing villages; Boughton Green Road; the Hotel Junction and A43.
- 30) Rat-running is currently a problem in several areas, but particularly between the A43, A508 and A45. This will be exacerbated by the proposed growth.
- 31) Given this area's proximity to the university, student accommodation appears to have been overlooked.
- 32) The level of development proposed in this locality would reduce the price of existing houses.
- 33) The ground in this area consists of clay overlaying sand and is therefore unstable. As such, it is not suitable for development.
- 34) The fields in these areas have been used in a recreational capacity for several decades by local residents. This could not occur if this area is covered in development.
- 35) The scheme is lacking in clarity and detail. In particular, the maps provided are too vague and the exact area affected cannot be accurately gauged.
- 36) More employment land is needed rather than new homes, as there is a lack of jobs in Northampton.

Question 27 (Object) continued

- 37) Park and ride facilities will not overcome the transport issues arising from the level of development proposed. In particular, park and ride will not encourage people into Northampton Town Centre as it has been designed for out of town retail. Furthermore, no detail or evidence has been provided to indicate the viability of such a facility.
- 38) The new housing, particularly affordable housing, will increase crime rates in this locality.
- 39) The evidence base for this option is incomplete, particularly with regard to infrastructure provision. As such, this option is not justified and therefore not sound in terms of PPS12.
- 40) A new settlement between Northampton and Wellingborough is more suitable. This option was originally envisaged in the Regional Planning process and could utilise the A45 and A509, thus being more cost effective.
- 41) These homes will house more immigrants, which the country does not need.
- 42) The housing proposed will put pressure on the redevelopment of Sywell airport. In particular, there is potential for air accidents and noise to adversely impact the new homes.
- 43) This development will only serve to increase traffic and warehousing close to Sywell airport and paid for out of the public purse.
- 44) The number of new homes proposed is excessive and there is a disparity between the number of homes to be built and the projected population increase. The projections indicate that the population is set to increase by 92,000 (62,000 homes are to be built). This results in one home per 1.5 people, which cannot be correct.
- 45) This area has been promoted by developers and not identified in the issues and options responses as a preferred area for development. As such, this option appears to be developer led.
- 46) The suggestion that this area can be brought forward for development early in the plan period is worrying as it indicates pre-judgement of this site.
- 47) Development of land north of Round Spinney, Pine Ridge and the Brittons Drive developments would be precluded by the Daventry Local Plan as this land is designated a Rural Access Area. Similarly, Overstone Park is designated a green wedge in the Daventry Local Plan and development is therefore precluded.

Question 27 (Object) continued

- 48) Development at Buckton Fields and Dallington Heath/Grange has been previously refused by Northampton Borough Council due to traffic issues. As such, this allocation should be removed from the plan.
- 49) Development to the north of Northampton should be expanded to include infill areas at Moulton and Boughton to link with allocated land at Buckton Fields. This will enable a coordinated and comprehensive approach ensuring maximum benefit, particularly in terms of infrastructure provision and delivery of a Northampton relief road.
- 50) Developers will only construct high density, small units as these are the only type selling.
- 51) Dallington Grange should be allocated as a strategic site given its large contribution to housing numbers.
- 52) This option is not sustainable as it has poor links to the M1 and rail routes.
- 53) More housing and jobs need to be allocated to this option to achieve the critical mass needed for infrastructure and transport.
- 54) This development will result in the area being administered by Northampton District Council, not Daventry District Council. We would rather remain part of Daventry District.

General Comments

- 1) Key criteria for the selection of these urban extensions should be; sufficient critical mass to justify substantial investment in related infrastructure, existing or improved public transport accessibility, scope for high quality complementary land development which would be attractive to the market; flood risk; minimising environmental impact; and effects on any designated sites, important landscapes and biodiversity.
- 2) This option has limited impact on nationally designated heritage assets. The effect on listed buildings, Overstone Park and undesignated archaeology will need to be considered as part of the master planning process. In addition the proposed up-grade of the A5199 could adversely impact on: Boughton Conservation Area, Holly Lodge (Grade II), setting of Old St Johns Church, scheduled ancient monument and Roman and Medieval archaeology.
- 3) The route taken by any upgraded transport infrastructure should take account of the needs of existing education providers as well as business and commuter needs. Any routes should avoid dividing the built campus and take a route to the north of Moulton Lodge Farm.

Question 27 (General Comments) continued

- 4) A suitable buffer zone should be provided around the Pitsford Reservoir Site of Special Scientific Interest (SSSI). This is a major site for the passage of wintering waterfowl in the East Midlands and the largest water body in Northamptonshire. Both the reservoir and marginal land is important.
 - 5) Specific reference should be made to pedestrian, cycling and public transport linkages with the Weston Favell District Centre.
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Question 28

Question – Do you support the development of the Preferred Option 'Northampton South East'?

Summary of Key Points Raised in the Responses:

Support

- 1) Supports this sustainable urban extension subject to the satisfactory design and completion of the link road between the A45 and M1. This is essential to avoid “rat running” through Ecton or Earls Barton and to discourage greater use of routes to the A14/ M6 junction.
- 2) A development in this location is highly sustainable and relatively free of landscape and environmental constraints. The scale of development enables the provision of significant infrastructure to enhance the sustainability of a compact expanded Northampton (more than other fringe locations allow).
- 3) The approach of containing district centres within the proposal is supported. The reason for supporting district centres in this location is that a development of this size would require critical infrastructure within easy reach of the population. This will assist with reducing the need to travel.
- 4) Good vision for the area.
- 5) Development along the margin of the Nene Valley is a logical growth along transport routes.
- 6) Support careful planning of affordable housing.
- 7) Supported providing the adequate infrastructure is provided with the development and implemented at the same time.
- 8) Will create easier access to M1.
- 9) Town needs to expand housing provision.
- 10) South East expansion supported although growth must be market driven.
- 11) Rapid Transit route is supported.
- 12) It would be practical to extend these built-up areas whilst implementing lessons learned from existing developments.
- 13) There is sufficient land to accommodate growth and infrastructure will be easier to implement.

Question 28 (Support) continued

- 14) More homes, jobs and amenities are desirable.
- 15) Support providing the 'green areas', paths/cycleways, and play areas and required infrastructure are provided.
- 16) Standard of housing and open space provision in Wootton and East and West Hunsbury are high and should not be lowered. Well done to all the planners involved. This area is a successful, sustainable community, built on green field land and there is no reason why Northampton southeast could not achieve the same results.
- 17) Development at Northampton South East would provide better linkages with existing road network.
- 18) Development will encourage the regeneration of Northampton town centre.
- 19) Potential for on-site retail provision in this area should not be overlooked. The potential exists to encourage people to shop at Northampton, with easy access to and ample free parking rather than losing trade to Milton Keynes.
- 20) Interesting shopping experiences should be created.
- 21) Northampton South East is a logical extension already confined by built development by existing commercial and residential. It should be prioritised as a potential location for growth.
- 22) Option does not interfere with housing already in place and will not remove the openness provided by the golf course.
- 23) Providing balancing ponds are created to mitigate flood risk. Provide a reservoir to capture storm water.

Object

- 1) This option is unsustainable and fails to meet the objectives of the strategy.
- 2) Level of affordable housing is unacceptable, as it will encourage anti-social behaviour and crime.
- 3) Rapid Transit system will take a considerable length of time to complete. Houses will be built prior to this, which will encourage people to Milton Keynes.
- 4) No detail provided on how carbon footprint will be reduced.

Question 28 (Object) continued

- 5) It's all too vague and meaningless and we are not even sure what sustainability means.
- 6) Since the houses were built at Grange Park, the traffic into Northampton has increased by a ridiculous amount; the A45/A508 is already a bottleneck at peak times.
- 7) Many caveats within document regarding need to investigate further suggests that the JPU does not know what is required and thus plans will be approved without any agreed infrastructure. This also makes it difficult to make informed comments on the document itself.
- 8) Rail services are inadequate for Northampton considering the growth it is receiving a new rail station must be built on the main line linking Northampton to London and the North.
- 9) Historically, under performance of new developments has caused scepticism about the ability of new developments to deliver infrastructure, roads and services.
- 10) Current inadequate waste disposal in the area will be worsened.
- 11) This option will increase air, noise and light pollution. The A45 is already the main source of pollution in the County and the planned new roads would create even more.
- 12) Not enough employment land has been set aside for this development. Coupled with its proximity to the M1, this option would accentuate employment out migration to places like Milton Keynes and London and not support regeneration of Northampton.
- 13) The green infrastructure value of the Houghton land and the hillside villages' landscape on the ridge above the flood plain provide strong reasons not to develop this area.
- 14) Bradfield has numerous constraints including a 'significant' conservation area, Biodiversity Action Plans (BAP) sites and historic buildings.
- 15) This area is remote from Northampton and other significant centres.
- 16) The landscape value of this area would be completely lost. The ridge land along the A428 is particularly sensitive.
- 17) This option prejudices and is inconsistent with the review of the East Midlands Regional Plan.

Question 28 (Object) continued

- 18) The proposed road and public transport links to Northampton are inadequate and will become clogged with this level of development.
- 19) The new A45 to M1 trunk road will not be able to accommodate traffic from this growth, be expensive to establish and disrupt existing traffic flows. Replacing Junction 15, M1 to achieve this is wasteful and not required whilst the road itself will have an adverse impact on the tourism potential of Billing Aquadrome. This road will also destroy communities and affect individual properties and be to the detriment of local business. There are also likely to be significant engineering issues to overcome.
- 20) The new roads will contribute to greenhouse gas emissions and are therefore contrary to national policy.
- 21) Flood risk has not been properly assessed. Furthermore, this option will exacerbate flood risk in this area due to increased runoff and reduced infiltration. This flood risk cannot be overcome with SuDs.
- 22) All growth should be accommodated on brownfield sites, rather than the green field sites as proposed. There is already an abundance of vacant and disused brownfield properties that could be utilised instead. Previous urban capacity work indicated that 70% of development could be accommodated on brownfield land. The remaining 30% could be accommodated around smaller communities or arranged into a small new town.
- 23) This option will envelop and destroy several villages and blight the landscape. In particular, Great and Little Houghton should be protected and Preston Deanery should remain as a separate settlement. The M1 A45 road link and associated junctions would also affect listed buildings and a registered historic park and garden.
- 24) The evidence base for this option is incomplete and unjustified. As such, this option is not sound in terms of Planning Policy Statement 12: *Local Spatial Planning*. The option appeared 'out of the blue' when 90% of the area covered by the Preferred Option was not included in the options for Northampton's expansion identified by consultants in 2007 and subsequently put out for consultation in the 'Issues and Options' document. It is hard to avoid the conclusion that the decision to add the Northampton South-East option has either been taken arbitrarily, as a desperate measure to provide the required housing numbers, or is in response to developers' plans already in existence

Question 28 (Object) continued

- 25) The assessment of this option appears to have been perfunctory. For example, the section on 'What the development delivers' runs only to three bullet points, compared with 11 for the Northampton North option. 18,000 houses are going to be built in this area and all that is going to be provided, according to the document, are two or three primary schools, a secondary school and new health and other community facilities including a library. Is that really all that an additional 50,000 people in this area are going to require?
- 26) There is no evidence that a proper assessment of the implications of going ahead with this option has been made. The section explaining why the Northampton East option has been rejected refers to its effects on sensitive water/ wetland sites (although these are actually within the South East Option, on the south side of the River Nene!), visual sensitivity and evidence of prehistoric and Roman occupation. There is no indication that similar assessments have been made of the Northampton South East option, even though many of the same considerations would apply.
- 27) The strategy is trying to build the equivalent of a new town tacked onto the side of a struggling overgrown market town with an already existing infrastructure 'deficit' including a decent police service, schools, doctors, Hospitals, community centres, sports facilities. Social (schools, doctors, Hospitals, community centres, sports facilities) and physical (i.e. waste, storm and potable water, roads, electricity) infrastructure will all need to be constructed to support this development. It is difficult to see whether this can be achieved given the existing deficit.
- 28) The strategic improvements to the highway network include a new road link from the A54 to the M1 and relocation of Junction 15, M1. Based on the Highways Agency's own estimates, such a road would cost at least £250 million to build. How will this be paid for?
- 29) There would be an increase of more than 15,000 cars with this level of development. Unless it is possible to restrict car ownership and usage, the maximum modal shift obtained would be approximately 5%. This means that in a best case scenario 90% of people would still use their cars for most or all journey. With air pollution levels in and around Northampton already at high levels this would be disastrous for all residents of the Northampton area.
- 30) Major infrastructure is needed up front, but past experience suggests that this will not happen. The promises of the past have not been kept, for instance in Grange Park, Wootton, Duston and Upton. Relying on developers to fund a significant part of the infrastructure suggests that the strategy will therefore be looking to develop the land most attractive to developers i.e. Greenfield land.

Question 28 (Object) continued

- 31) This option will occupy areas of prime agricultural land at a time when the government is encouraging domestic food growth. This land also contributes greatly to the local employment.
- 32) Any development located near to the M1 motorway encourages low density, low paying, B8 (Storage and Distribution) warehousing employment.
- 33) Instead of building more warehouses, this land should be used for houses.
- 34) The diagrams are considered to be broad brush which gives an illusion that the development of Northampton means concreting over the countryside. The map of future growth tries to capture the aspiration of Northampton becoming a city, but in doing so alienates, and unnecessarily creates misconceptions about the amount of development.
- 35) The lists of required infrastructure are lacking, particularly in terms of transport and that there is no mention of communications and technology related infrastructure, for example Broadband. This must be included to attract knowledge-based industries.
- 36) The housing requirement figures are over inflated, outdated and unrealistic. The Regional Spatial Strategy figures are under review whilst the evidence base does not show any proven need for this level of housing given the present economic climate. It will take another decade of growth in the economy to justify the dwellings projected for 'Northampton South East' alone and that it is ludicrous to estimate projections beyond 2026.
- 37) The opportunity to generate a "knowledge corridor" to the north of the new city centre will be undermined by this option. By preferring housing and employment growth to the south east of Northampton, the draft strategy precludes the investment in road infrastructure to the north that would release land for the "University Arc" between the University, Moulton College and Northampton College.
- 38) This option appears to have been conceived to support an aspiration for Northampton to become a city. Given Northampton's history as a market town and the resulting effect on its layout and infrastructure, this is unrealistic.
- 39) Local people do not want this option.
- 40) This is the driest area in England. As such, there will be insufficient water available for people in this area.

Question 28 (Object) continued

- 41) The proposed development will infringe Human Rights.
- 42) This option places a disproportionate burden on Northampton South East to accommodate development. Development would be more sustainable if spread evenly around Northampton.
- 43) This option will cause house prices in this locality to fall.
- 44) This area is rich in history and contains several archaeological sites. Neolithic, Bronze Age, Roman and more recent sites can be found throughout as well as scheduled ancient monuments. Development of these areas will disrupt and threaten these sites.
- 45) This option represents an undesirable elongation rather than compaction of the urban form.
- 46) Large dense development like that proposed will become future slums, like East Northampton.
- 47) This area contains the habitats of many forms of wildlife. Development would destroy this.
- 48) The land in this area is unstable being underlain by a bed of clay then sand.
- 49) Much of this land is criss-crossed by public rights of way that may be obscured by development.
- 50) The planners are supporting development of greenfield sites to raise more money for infrastructure.
- 51) This option contains insufficient detail to indicate how it will be achieved. In particular, no infrastructure or funding plans are presented and the Highways Agency has not been consulted.
- 52) The job per dwelling ratio is incorrect and unachievable, particularly in light of the current recession.
- 53) Rapid transport link following the old Railway Route is ill conceived as it will require two level crossings and will exacerbate traffic problems for the south approach to Northampton.
- 54) What is a Rapid Transport Link? A Tram? This needs to be made clearer.
- 55) The agricultural land is required to meet sustainable food targets and encourage the growth of the bio fuel industry

Question 28 (Object) continued

- 56) The empty properties in Northampton must be sold or redeveloped before new development takes place.
- 57) Limited growth could be directed toward the villages.
- 58) Proposals will have adverse impacts upon the resident's quality of life in rural areas affected by this extension.
- 59) Developer contributions will be insufficient to fund the infrastructure proposals.
- 60) The development of brownfield land should be prioritised above greenfield sites.
- 61) Existing employment or proposed employment growth is insufficient to meet the need of the proposed extension.
- 62) The Emergent Joint Core Strategy does not adequately reflect the proposals as per the Issues and Options stage.
- 63) Consultation representations during the Issues and Options stage have not been taken into account.
- 64) Insufficient evidence base to justify the preferred options within the Emergent Joint Core Strategy.
- 65) This option, together with previous extensions, has done nothing to encourage the regeneration of Northampton.
- 66) Consultation has been insufficient, unclear and hurried. The process has lacked transparency.
- 67) Plan does not address climate change.
- 68) Plan will not create a distinctive character to the area.
- 69) Extension will produce a dormitory area.
- 70) Proposal will discourage high tech industry to be located in this area.
- 71) Improvements to the M1/A45 link will cause increased congestion to the M1. To develop the transport capacity at corridor between Wellingborough and Milton Keynes/Junction 14, M1 where capacity is available, would be preferable.
- 72) Improvements to existing infrastructure and new infrastructure would be required before any new houses are built. This is unlikely to occur.

Question 28 (Object) continued

- 73) No indication of an implementation plan or cost projections of providing infrastructure.
- 74) New road and moving Junction 15, M1 south would create huge difficulties in reaching Brackmills and Grange Park industrial estates.
- 75) Development would be suitable on land either side of the M1 where landscape has already been disturbed.
- 76) Villages within the development area would need substantial greenbelts.
- 77) The country cannot afford to invest large sums of money into dual carriageway construction.
- 78) Flooding impacts at Billing have not been considered – damaging implication for tourism in the area. Drainage for Northampton area is already unable to cope and development is contrary to the requirements of *Planning Policy Statement 25: Development and Flood Risk*.
- 79) Proposed link road would isolate rural areas to the east from Northampton.
- 80) Option is unacceptable Little Houghton Conservation Area and numerous listed buildings will be significantly affected.
- 81) Affordable housing percentage is unacceptable – intermediate housing is unlikely to be filled by key workers and will be used for social rented accommodation.
- 82) Lack of assessment of South East Option in terms of Social Impact Assessment / Traffic Assessment / Air Quality Assessment / Biodiversity Impact Assessment / Environmental Impact Assessment / Flood Risk Assessment / Geological Survey.
- 83) No information provided on location of employment elements.
- 84) Identity and social fabric of self-sustainable villages will be lost.
- 85) No support for either of the extension options.
- 86) Development at the South West must not continue there is already unused allocated land in this area.
- 87) The South East extension does not appear in its current form in the Issues and Options consultation document.
- 88) The loss of green rural land to development, which will result in the engineering of unnatural open space on the same land is nonsensical.

Question 28 (Object) continued

- 89) Historically, modal shift does not occur. If people have cars they will use it. This is a fantasy.
- 90) Plans appear to be developer led.
- 91) Loss of rural recreation and leisure space.
- 92) Rather than providing a rapid bus transit along the old railway route, the Bedford/Northampton railway line should be reinstated.
- 93) The West Coast Mainline is already at capacity and will not be able to cope with further development.
- 94) Progressing with this option is contrary to the Vision and objectives within the Emergent Joint Core Strategy and the criteria that have resulted in the rejection of some options could equally be applied to Northampton South East – i.e. high landscape value of the ridge, pattern of dispersed villages, protection of character of settlements, detachment due to transport route – A45.
- 95) Distribution of housing in West Northants should be more even distributed across the area.
- 96) The provision of services and facilities should be a given in any large development and should not be used to justify the extension at Northampton South East.
- 97) Document is contrary to the *Planning Policy Statement 12: Local Spatial Planning* tests of soundness as it is neither justified nor effective.
- 98) Detachment due to A45 will not encourage sustainable modes of transport, walking cycling, into Northampton Town Centre.
- 99) Insufficient sewerage capacity to accommodate South Eastern extension.
- 100) Development will be a repeat of past mistakes made at Northampton East District and will exhibit many of the same social problems that current exist there.
- 101) No evidence to suggest the Highways Authority supports the new link road.
- 102) Existing transport and infrastructure need of the area must be addressed.
- 103) No evident account of Joint Planning Unit North and East.

Question 28 (Object) continued

- 104) To provide a second junction to the M1 at such close proximity to other junctions would be rejected. There is no mention of this road link within the M1 route Action Plan or the Local Transport Plan.
- 105) Construction of this option and supporting infrastructure would cause significant disruption.
- 106) The new A45/M1 link road will obliterate Quinton.
- 107) Phased finance and/or roof tax should not be used to finance infrastructure.
- 108) No/insufficient evidence of alternative sites has been provided to indicate that this site is the only reasonable alternative.
- 109) With the post-war 'Bulge' cohort downsizing, large numbers of houses will become available for refurbishment, subdivision and rebuilding. Combined with refurbishment of the eastern district, it is possible to place high-density appropriate housing in areas where infrastructure already exists, minimising urban sprawl and construction costs.
- 110) The new A45-M1 link will form a physical barrier between the villages and Northampton.
- 111) Development will result in adverse impacts upon Great and Houghton and extensions to Little Houghton Primary School will ruin its appeal and character as small village school.
- 112) The proposed road runs in close proximity to the Yardley Chase Site of Special Scientific Interest (SSSI), a major breeding ground for a number of rare and threatened species.
- 113) There is no mention of route access into town; the Plan is focussed towards directing traffic away from Northampton.
- 114) Plans cannot preserve the existing green infrastructure by developing the area.
- 115) There is no local need for this scale of housing.
- 116) Loss of public rights of way.
- 117) Funding for the required level of services and facilities cannot be guaranteed.
- 118) House prices in the villages will substantially decrease.

Question 28 (Object) continued

- 119) Will result in loss of village community and a decline in the quality of life enjoyed by exiting residents.
- 120) Will impact on visitors to the villages and tourism to the area.
- 121) Inconsistencies exist within the Plan (job figures) and the document, in places, is difficult to understand. The consultation has been insufficient and the Brafield exhibition only occurred after the close of the consultation period.
- 122) Northampton General hospital is at capacity and will not cope with extra demand from new residents at south-east Northampton. Other local medical/dental facilities are also at capacity.
- 123) Northampton South East will affect the Upper Nene Gravel Pits potential Special Protection Area.
- 124) Extending to envelop villages at the rural periphery of Northampton is contrary to a number of the objectives proposed in the Emergent Joint Core Strategy (objectives, 5, 6, 7, 8, 10, 16).
- 125) Concern regarding the level of policing that will be available.
- 126) No commitment to provide a secondary school.
- 127) Difficulties of estimating industrial/commercial growth implies labour demand will be equally as difficult to gauge over next 25 years.
- 128) Vehicular access to the site is insufficient.
- 129) Insufficient parking available in town centre and at train station.
- 130) Schools are oversubscribed, especially Caroline Chisolm – development of Northampton South East will increase the pressures on school places.
- 131) Concerns over rise in council tax.
- 132) High-rise accommodation on brownfield sites would reduce need to build on greenfield sites.
- 133) The area is outside the authoritative boundary of Northampton and although it will form part of Northampton it will not receive the Council Tax from the new residents.
- 134) The Queen Eleanor roundabout is already at a stand still in the mornings, it is an easier and better option to travel to work in MK.

Question 28 (Object) continued

135) Simply extending the motorway junction is not enough.

136) There is a shortage of jobs now; more people would make this even worse.

General Comments

- 1) Key criteria for determining the sustainable urban extensions should be; sufficient critical mass to justify substantial investment in related infrastructure, existing or improved public transport accessibility, scope for high quality complementary land development which would be attractive to the market; flood risk; minimising environmental impact; and effects on any designated sites, important landscapes and biodiversity.
- 2) Undeveloped allocations must be delivered before new housing sites are allocated.
- 3) Development must provide ample parking. Not one space per household. Grange Park cited as example of poor parking provision.
- 4) It would be beneficial for settlement growth options to be cross referenced to key transport requirements and phasing delivery identified the Regional Spatial Strategy. The respondent advises clarification of how transport schemes would be funded would be useful.
- 5) Northampton has to grow, but not to such an extent to damage its heritage.
- 6) Northampton has accepted disproportionate levels of growth against the national average.
- 7) One or more schools will be needed to support this option.
- 8) This option may have an adverse impact on the Upper Nene Valley SSSI and potential Special Protection Area (pSPA). The site comprises a series of gravel pits, which is a nationally important site for breeding birds' assemblage with both open water and marginal habitats being important. An appropriate buffer zone should be agreed to protect the site from any possible negative impacts resulting from the proposed developments.
- 9) The relationship between this area and Grange Park, Wootton Fields and Brackmills needs careful consideration to ensure this area is enhanced rather than adversely affected by development.

Question 28 (General Comments) continued

- 10) This should not be the only option with an improved and direct link to Castle Station when there are poor links from all over the town. The respondent wants to see a new commuter station (West Coast Main Line) with modern facilities, safe and easily accessible parking and safe cycle routes because Castle Station is no longer fit for purpose.
 - 11) Growth to the North of Northampton would be closer to the University and would be capable of expanding current industrial areas it would also be close to Kettering and Wellingborough which would encourage movement to Northampton and benefit regeneration.
 - 12) Insufficient detail in plan to comment.
 - 13) The preferred options for growth diagram is blurred (issues and option document was significantly clearer). This does not provide an effective basis on which to provide comments.
 - 14) Development near M1 will encourage B8 employment uses.
 - 15) Additional rail stations should be built at Milton Malsor, Roade, Castlethorpe, Althorpe and Daventry International Rail Freight Terminal (DIRFT).
 - 16) Rather than build a new M1/A45 link, the existing A509 from Wellingborough to Milton Keynes should be upgraded. This would follow a more direct route and land exists along its length to allow widening.
 - 17) The proposed housing numbers should be aligned with natural population growth.
 - 18) If development to North of Rothersthorpe continues the justification for Northampton South should be questioned.
 - 19) Isn't this area greenbelt land?
-

Question 29

Question – Do you support the development of the Preferred Option 'Northampton Junction 16'?

Summary of Key Points Raised in the Responses:

Support

- 1) Good idea to encourage business on this site. Employment is needed to support the population growth.
- 2) Improvements to transport links are vital, in particular to local villages, Northampton and Daventry. A new road to Junction 16, M1 and the A45 is required.
- 3) Provided that the character of the villages in the area is protected.
- 4) Good connectivity with existing facilities, and access to M1 it is a logical site for employment.
- 5) The development provides the opportunity to upgrade the surrounding road network.
- 6) Will improve the local economy and provide work for Daventry and Northampton.
- 7) This is the best option in terms of transport access, and is ideally located for businesses where heavy goods movements are required.
- 8) A sensible choice as it is not located near any villages, and it will not disrupt the existing population.
- 9) Support, particularly if it would help fund the Flore-Weedon Bypass. Firm proposals for the transport links are needed. Some respondents argue that the bypass is essential for this development to proceed.
- 10) Support, but could also include housing.
- 11) Support, subject to further and detailed consultation.
- 12) Already an area of major redevelopment, and previously supported in the Local Plan.
- 13) Could be linked to *Northampton Option 5 (South of M1 and South-West)* to reduce the need to travel.

Question 29 (Support) continued.

- 14) Support the aspiration for knowledge based employment to complement the University, but this will require a better physical link to the University Arc than is currently proposed. Unless allocations are tightly managed this site is likely to attract the logistics industry.
- 15) Strongly support the identification of Junction 16, M1 as a location for strategic employment growth. The site could deliver development in three phases linked to highway capacity improvements. The site is not affected by landscape, ecological or other environmental constraints and there are no overriding infrastructure constraints, such as flood risk. A phased development can be accommodated on the highway network, with a new roundabout on the A4500 and improvements to Junction 16, M1. Detailed proposals for highway access, walking, cycling and public transport provision are set out. This includes the potential to improve existing bus services between Daventry and Northampton and local links to the town centre and bus station. The site is well suited to the delivery of warehouse and distribution uses, and a Masterplan will be prepared to ensure the delivery of a high quality employment area with complementary uses such as hotel/conference facilities. At least half the site could be developed within the capacity of the existing infrastructure.
- 16) This site has the potential to be of regional or national importance given its location on the highway network.

Object

- 1) The town has already expanded far enough to the west.
- 2) People will travel to Milton Keynes from this location rather than try to access the town centre.
- 3) The Plan is based on inaccurate and out of date growth projections.
- 4) The flood plain in this vicinity should not be built on, the proposed development will increase flood risk downstream to Kislingbury and Northampton.
- 5) The road network, including the M1 is already too congested. Widening would not solve the problem. Would have a major impact on through traffic to and from Junction 16, M1. It is likely that the scale of the development would compromise the safe and efficient operation of the M1.
- 6) The development will be utilised by the logistics industry, which generate few jobs. It is unlikely to deliver the 11,500 jobs, which are sought.

Question 29 (Object) continued

- 7) Question why new industrial units are needed when there are many vacant units in Northampton e.g. empty warehouses in Grange Park, Pineham and Swan Valley. Many developments remain to be built out, such as Brackmills, Moulton Park, Round Spinney and Lodge Farm.
- 8) Development will be highly visible in a sensitive area. Object to the loss of countryside. This would have unacceptable landscape impacts and lessen the separation between Northampton and settlements to the west. The land provides a critical open countryside buffer to Northampton. The hills in this area are a significant and important feature, visible from miles around.
- 9) Requirements for growth should be accommodated on brownfield land first. Sufficient empty sites exist without creating new blots on the landscape.
- 10) The proposal conflicts with the objective of the Northampton Central Area Action Plan to 'bring employers back to the centre'. This also contravenes national policy in *Planning Policy Statement 4: Economic Growth* and *Planning Policy Statement 6: Town Centres*, which seeks to accommodate employment uses in urban areas. The development at Junction 16, M1 will result in a disconnected and unsustainable business park, which would threaten Northampton's regeneration objectives.
- 11) Unsustainable location, 5 miles from Northampton and remote from existing and proposed housing areas. No evidence that this will be sustainable in the future and will be a car dependent development contrary to principles stated elsewhere in the Emergent Joint Core Strategy. Employment sites should be within walking and cycling distance of residential areas.
- 12) Development at Junction 15 and 15A, M1 / A43, and the southern part of the Sandy Lane Relief Road, with a new commuter rail station would be preferable.
- 13) Specific objections based on the impact of development on Kislingbury, including traffic impact, visual intrusion, increased noise levels, air pollution, and smell from sewage treatment works. This will substantially reduce the quality of life in the village.
- 14) If the proposed Flore bypass was to pass south of Nether Heyford and between Bugbrooke and Pattishall linking to the proposed southeast bypass, there would be scope for development in this location without affecting existing communities.

Question 29 (Object) continued

- 15) The approach to infrastructure is inadequate.
- 16) Valuable agricultural land would be lost.
- 17) The proposal will destroy the landscape, heritage, character and community of the village or Harpole. Junction 16, M1 should remain as it is, open countryside, an unspoilt part of the rolling landscape with Harpole remaining as a beautiful village in accordance with the spatial vision set out in the Emergent Joint Core Strategy.
- 18) Object to building on areas known to be an unstable glacial valley floor.
- 19) Object to the destruction of sites of significant heritage and archaeological interest.
- 20) When tested by Sustainability Appraisal (SA) this site performs poorly. Because of its peripheral location it will be car dependent and is reliant on significant infrastructure provision. In terms of landscape the SA identifies it as being high to medium sensitivity. Locations, which are more central to Northampton, including land at Arm Farm, would be more sustainable.
- 21) Just because the existing population is small does not mean that there will be no resistance when it comes to protecting our rural way of life.
- 22) The development would desecrate the rural setting, which includes; a partially excavated Roman settlement, verdant water meadows, ridge and furrow fields, the Halfway Public House (PH), the ancient Brickyard and the remains of parkland associated with Harpole Hall.
- 23) The regeneration and growth of Daventry would be substantially undermined.
- 24) The very low ratio of jobs proposed for the site suggests low density development that would be impossible to serve effectively by public transport.
- 25) Growth beyond the designated West Northamptonshire Development Corporation (WNDC) boundaries is totally unacceptable.
- 26) Down with fat cat quangos (quasi-autonomous non-governmental organisation).
- 27) We are known as the county of squires and spires and don't want to live by an industrial estate.
- 28) It will encourage greater car use which conflicts with environmental and health related priorities.

Question 29 (Object) continued

- 29) The West Northamptonshire Joint Planning Unit (WN JPU) fail to understand how important the countryside and village life is to everyone living in Harpole.
- 30) Better sites exist which could accommodate this type of development such as Daventry International Rail Freight Terminal (DIRFT) and the Northampton South East Option, which could provide a mixed use urban extension.
- 31) There is a danger that if this development proceeds then there would be future backfilling of development along the A4500 to Northampton.
- 32) Area 5 is preferred.
- 33) This site is not supported by robust evidence such as the draft Strategic Employment Land Assessment (SELA) report and as such is contrary to the requirements of *Planning Policy Statement 12: Local Spatial Planning*. Indeed the SELA highlights a number of issues with this site. Whilst it may be commercially attractive it scores poorly on sustainability. It is unclear how the development would serve Northampton without substantial public transport investment.
- 34) Without the ability to connect by rail this site fails to fulfil the aspirations of Regional Spatial Strategy Policy 21.
- 35) Do the people of Northampton want all the gateways to their town to be guarded by distribution centres? This will not give a good impression to the tourists, shoppers and knowledge-based employers we want to attract.
- 36) The Kislingbury Action Group has formed to secure a countryside buffer to the village by preventing any further development beyond those already planned at Upton and Pineham.

General Comments

- 1) The growth requirements set out in the Regional Spatial Strategy are no longer accurate and need to be recalculated.
- 2) There is substantial brownfield capacity in Northampton, which should be developed first.
- 3) Existing communities to the south and west of Northampton have developed without adequate infrastructure. These should be completed satisfactorily before further development is allowed.

Question 29 (General Comments) continued

- 4) Northampton and its surroundings are prone to flooding. Massive investment is required in the drainage system before further building can take place. Concern exists regarding the ongoing maintenance of Sustainable urban Drainage System (SuDs) systems.
- 5) Question the need for this development, as Swan Valley is full of empty warehouses. The evidence for employment development in this location is not robust or credible. There are some 5 million square feet of available industrial warehouse in Northampton and its surroundings.
- 6) The proposal is unclear and insufficient information is available to make a decision.
- 7) The development must deliver the Flore-Weedon Bypass.
- 8) Should not be considered unless the M1 is widened to 4 lanes.
- 9) Further warehousing provision in this location may detract from Daventry. Concern that this may compromise the investment and job growth at DIRFT.
- 10) The area shown in the Emergent Joint Core Strategy (176ha) is much higher than the area shown in the *SELA report* (40.4ha). This higher figure needs to be justified by evidence and tested by sustainability appraisal.
- 11) Requirement for development could be reduced by distributing development in villages and the centre of town.
- 12) How was the exact figure of 11565 jobs calculated?
- 13) Concern that unless development is restricted to the immediate proximity of Junction 16, M1 it could lead to ribbon development and coalescence with the village of Harpole.
- 14) The Emergent Joint Core Strategy itself suggests that there are serious doubts about the suitability of this site for employment.
- 15) The local economy is in competition with many other investment locations and it is therefore important that the strategy facilitates a wide range of employment locations.
- 16) Does not appear to be well related to the urban area in terms of the urban concentration approach contained in the Regional Plan would be essential to provide non-car mode linkages to/from the urban area.

Question 29 (General Comments) continued

- 17) Concern about the increased demand on water supply and the adequacy of sewers e.g. Church Lane, Bugbrooke.
 - 18) Not integrated into the town and would not help the town centre.
 - 19) Further work is needed on the evidence base before this can be considered as anything other than a tentative proposal.
 - 20) Without some form of linking development this would not be sustainable. If the Junction 16, M1 proposal is adopted then the development focus for Northampton should shift along the A4500 and away from the south east.
 - 21) The out of town location of the site, its proximity to the M1 and the likelihood that it will be empty at night makes it a potential target for criminals.
 - 22) Consideration should be given to new development towards Rugby, where there are plans to develop the area by Warwickshire.
 - 23) Further archaeological investigation is required as there is a significant Romano-British villa site at SP 684599 and evidence of Bronze and Iron Age activity.
 - 24) Concern regarding the proximity to the Bugbrooke Meadows Site of Special Scientific Interest. The impact of development on the (SSSI) needs to be carefully assessed and mitigated.
 - 25) Preferable to Northampton South East but still a risk that it will be a dormitory development.
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Question 30

Question – Do you support the development of the Preferred Option 'Northampton West'?

Summary of Key Points Raised in the Responses:

Support

- 1) It is common sense again and much needed.
- 2) Only if the growth is needed.
- 3) New Northeast and North road will support effects of growth.
- 4) There is capacity available within the existing road infrastructure.
- 5) Based on the urgently needed Sandy Lane Relief Road, this development is quite feasible.
- 6) The Northampton West development is close to doctors, fires stations and shopping centres, as well as the river Nene.
- 7) The option is supported provided it does not expand into the South Northamptonshire area without due consideration.
- 8) The Northampton West Development would fit well with existing and other proposed work.
- 9) Yes, but roads must come first to include taking the traffic beyond the A5199.
- 10) The area is supported, but the numbers of houses need to be reduced.
- 11) The Upton Grange development works well and there is room for further development. Consideration should be given to incorporating room for allotments.
- 12) The option would not affect any nationally designated sites.
- 13) There are some reservations about the effect of the proposed expansion of the A45 to A5199 including the direct and indirect impact on Harlestone firs.
- 14) This is a sensible choice an extension of Northampton without dominating the nearest settlement Harpole.

Question 30 (Support) continued

- 15) The proposal is consistent with the aims of the Milton Keynes South Midlands Sub-Regional Strategy (MKSM SRS) and Regional Spatial Strategy 8 (RSS 8). In particular, it is a clear expression of Policy MKSM SRS Northamptonshire 2 of RSS8, which promotes new development delivery through, inter alia, sustainable urban extensions.
- 16) The proposed extension could take advantage of transport links in a sustainable manner.
- 17) The area benefits from existing good linkages.
- 18) The land is fairly flat and not especially attractive as Harpole and Kislingbury are already very close to the edge of the town and to the A45.
- 19) It must be market driven.
- 20) This option will make it easier to travel between Northampton and Daventry.
- 21) The option is highly sustainable and will support existing communities by the introduction of much needed new infrastructure.
- 22) There would be beneficial community development (shops, schools, services etc) which would help reduce pressure on similar services elsewhere.
- 23) Supported provided that development doesn't go beyond the green shading shown by the key diagram.
- 24) This option will assist in the provision of effective public transport, sustainable networks of cycleways, new highways and enhanced green infrastructure.
- 25) This option is supported, as it is the only option that separates the existing villages from the proposed growth by Green Belt.
- 26) This option is supported as it is close to existing urban areas and the M1.
- 27) This option is a natural extension of development occurring in the north west.
- 28) This option would deliver growth contributing to better road infrastructure necessary to open up land for a university arc.
- 29) This option provides a community within easily accessible distance to the proposed major employment allocation at Junction 16, M1.

Question 30 (Support) continued

- 30) This development area includes local needs for open space, sport and recreating facilities.

Object

- 1) Develop the local area with the local community in mind first.
- 2) The housing requirement estimates produced by the East Midlands Regional Assembly are no longer accurate and need a full review.
- 3) There are sufficient brownfield sites to supply 70% of a reasonable growth capacity for the town. Many of these sites are dilapidated and abandoned and housing to the west of Northampton is lying empty.
- 4) This area is prone to flooding that will be exacerbated by the proposed development. Faster water run-off into the River Nene will result in greater downstream flood risk to Kislingbury and Northampton. The new flood defences have not yet been severely tested and cannot be declared a success.
- 5) The job numbers quoted will be optimistic. The proposed jobs will comprise warehousing which takes up large land areas and involves low skill levels and low occupancy rates.
- 6) The development will be on a highly visible, sensitive area, on a prominent landform.
- 7) There is no evidence presented as to why this option is the most sustainable and of most benefit to Northampton town. Furthermore, what evidence has been presented is incomplete.
- 8) Distribute housing in clusters across the county keeping small communities and with infrastructure that can realistically be funded.
- 9) The area shown is probably too big.
- 10) The proposed approach to infrastructure is too light.
- 11) Northampton West extends into an area that is of high priority for the restoration of acid grassland and heath land habitat.
- 12) When the Tories get elected they will repeal this totally wrongly placed development.
- 13) Harpole should be safeguarded. The area from Nobottle Road to Dallington Grange is less critical and could be linked through to Welford Road.

Question 30 (Object) continued

- 14) We do not support the building of this scale on agricultural land.
- 15) Development should be limited at the ring road and not sprawl. The realistic alternative is Northampton North, South and North East.
- 16) The proposal will not assist in improving air-quality.
- 17) The area is known to be an unstable glacial valley floor.
- 18) The proposal will destroy sites of significant heritage and archaeological interest. In Harpole there are two Roman Villas, iron age round houses and evidence of pre-enclosure landscapes where enclosure hedges are planted across remnants of the medieval strip system, pre-reformation religious holding, monastic fishpond, a field and hedgerow system established by an Enclosure Award of 1778, ancient charities, woodlands, Georgian parkland, manorial mill and sandstone farmers houses with historic occupation back to the civil war. This must be protected.
- 19) The present road systems are inadequate including: Northampton to Weedon Road (A4500), Harlestone Road (A428); Sandy Lane; Duston Road and Bants lane- these roads are particularly congested at rush hours. The proposed growth will exacerbate this.
- 20) We have witnessed the destruction of many villages, the problems of allowing this error to occur can be seen in Northampton's eastern district.
- 21) The development at Pineham is already visible to the villages and further expansion is unacceptable.
- 22) The villages, such as Kislingbury, already suffer light pollution from existing industrial development and the proposals will make this worse.
- 23) The sewerage system is already at capacity.
- 24) Growth should be contained within the West Northamptonshire Development Corporation (WNDC) designated area. There needs to be a full public inquiry into development outside of these areas.
- 25) All you want to do is concrete over the countryside. Some of us, the majority, like countryside.
- 26) With the post-war bulge cohort downsizing large numbers of houses will become available for refurbishment, subdivision and re-building. Combined with the re-development of the Eastern District, it is possible to place high-density housing in areas where infrastructure already exists.

Question 30 (Object) continued

- 27) The proposal will destroy greenbelt.
- 28) Stop “tacking” development on.
- 29) Finish the current mess off first.
- 30) The building of the relief road was an excuse for a massive land-grab.
- 31) Why do we need a country park when you could just leave the countryside in place?
- 32) Previous development has destroyed the character of this area and the mistakes of the past will be played out again. For example, the St. Crispin’s hospital site.
- 33) This proposal will destroy the character of the area.
- 34) There is no demand for this level of housing growth, as evidenced by the number of vacant and unsold properties around.
- 35) Given the state of the economy, it is doubtful whether this level of development can be funded.
- 36) The identification of the need for a town centre, without specifying the scale, location and form of such a centre is not effective and therefore brings into question the soundness of the Core Strategy in terms of Planning Policy Statement 12: *Local Spatial Planning*.
- 37) The proposal to establish a local centre is contradictory to the preferred retail strategy in section 6.8.7 which seeks to centralise retail.
- 38) This land has a high recreational value, which will be denied to local residents by the proposed development.
- 39) This option will give rise to high levels of air pollution that will impact Harpole.
- 40) Harpole should be protected as a separate settlement.
- 41) Down with fat cat Quangos. Save our village.

General Comments

- 1) It looks like this development is there to solely facilitate funding to complete the North-West Link (Sandy Lane Ring Road). It would be more acceptable to make this a new busy HGV route, the western boundary of the "city" otherwise it will leak westwards ad infinitum, crossing the unofficial and unrecognised secondary route from Daventry to Northampton.
 - 2) Need to maintain a countryside buffer between Northampton and Harpole/ Kislingbury.
 - 3) The option is too vague, being strong on rhetoric and low on details. As such, I am unable to form a judgement at this time.
 - 4) The plan is blurred and difficult to read.
 - 5) Which other area of Britain 5 miles long and 2 miles wide has seen this level of development over the last 5 years?
 - 6) Why is it Northampton that is first thought of for development? Is land cheaper here? Or is it merely a sop to the building industry? Why do planners home in on Northampton?
 - 7) Does the Upton lodge assumed capacity form part of the overall expectation of 6900 dwellings? Upton Lodge is not shown on Map 6.1 as an existing local plan allocation.
 - 8) The requirement for a new local centre would be better met by designating Sixfields a district centre, given its links with Northampton west and the existing community.
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Question 31

Question – Do you support the development of the Preferred Option 'Northampton South'?

Summary of Key Points Raised in the Responses:

Support

- 1) The inclusion of a Safer Community Team in this option is supported.
- 2) This location is a natural extension of an existing urban development and is close to some significant existing infrastructure (M1, A45) etc, which, if supplemented and improved, could ensure that this location can be developed with relative ease.
- 3) This is a common sense extension.
- 4) Support provided the flooding and drainage issues specified are resolved.
- 5) The transport links in this area (i.e. M1, railway, and southern ring road) are easily accessed.
- 6) Support provided the growth does not extend beyond the M1.
- 7) This location is close to employment options in both Northampton and Milton Keynes.
- 8) Although greenfield, this site is compromised by the motorway and would be more acceptable than other areas for development.
- 9) The developments at Wootton and both East and West Hunsbury are excellent. More of the same please.
- 10) This and the other urban extensions will kick start regeneration of Northampton Town Centre.
- 11) This option will have the least impact on existing villages.
- 12) Support, provided infrastructure is in place before or concurrently with housing and employment uses.
- 13) It is clear from the Parish council's publications that there is a clear, unjustified bias against this option. However, if objections were made to all development, Wootton Fields and East Hunsbury would be non-existent. Similarly, one of the best performing schools in the County (Caroline Chisholm), the health centre, library, supermarket and countless other community facilities would never have been built.

Question 31 (Support) continued

- 14) Expansion and investment of Northampton, like that proposed, is needed to make it competitive with Milton Keynes.

Object

- 1) The housing growth figures set out in Table 6.4 lack supporting evidence, and are therefore unrealistic.
- 2) Whilst much attention is given to population increase, no consideration has been given to the other end of the life cycle i.e. death. The strategy will need to set aside a number of hectares of land for burials.
- 3) This proposal was previously quashed in the County Structure Plan. The Legal action won some years ago by South Northamptonshire Council could still apply, as it is not a sustainable approach to development under the revised Regional Spatial Strategy 8 (RSS 8).
- 4) This option will promote out commuting to Milton Keynes.
- 5) The revision of the RSS 8 should be awaited. The housing requirements are no longer accurate.
- 6) The development area appears to be developer led (e.g. Bovis at Collingtree).
- 7) This area has restricted vehicular access and its development would impact severely on the wider trunk road system. In particular, development at Collingtree will increase congestion on Rowtree Road and add to congestion on the approach to Junction 15, M1. Rat-running, which is already a problem in several areas, will be exacerbated by this growth.
- 8) This level of development would further decrease traffic safety.
- 9) This site is covered in springs and regularly floods. Development here would therefore be flooded regularly and exacerbate flood risk for homes downstream. This flood risk cannot be overcome by Sustainable urban Drainage Systems (SuDS).
- 10) New development should seek to maintain the villages as separate settlements through the use of green infrastructure.

Question 31 (Object) continued

- 11) The previous Urban Capacity Study undertaken by Northampton Borough Council indicates that 70% of the proposed housing growth could be accommodated on brownfield sites. Furthermore, there are loads of empty and derelict sites that should be developed before the greenfield land in this area is developed.
- 12) This option is unsustainable.
- 13) Recently established communities in West and South Northampton have insufficient infrastructure. This will be repeated by this option.
- 14) Existing physical (potable, waste and storm water; roads) and social (e.g. schools, hospitals, doctors surgeries, emergency services, police, Churches, open space) infrastructure is insufficient and cannot support this level of development. Furthermore, the funding for this development is questionable, given the current recession and deficit run up by the government.
- 15) As a market town, Northampton was not designed to accommodate this level of growth.
- 16) This area is prime agricultural land that will be occupied by development at a time when, due to global warming and import restrictions, more food needs to be grown in the UK.
- 17) This development will give rise to air, noise and light pollution.
- 18) Employment uses will comprise largely warehousing and distribution. These uses have a low employment ratio and employ largely unskilled workers.
- 19) This extension will be detrimental to the character, amenity and way of life found in the surrounding villages.
- 20) Home buyers will not buy homes in this area, given its proximity to noise and pollution from the M1.
- 21) The proposed development may give rise to land slippage as this area is underlain with a bed of clay then sand.
- 22) The fields in this area are used by locals for recreation. This recreation area will therefore be removed should development proceed.
- 23) This option will depreciate homes in this area.
- 24) Archaeological sites in this locality will be disturbed.

Question 31 (Object) continued

- 25) Collingtree should be maintained as a separate village, through the use of green infrastructure. This village has 10 listed building entries including a Grade II* church.
- 26) The evidence base for this option is incomplete, particularly with respect to flooding and infrastructure. As such, it should not be included as a preferred option.
- 27) The employment land area will be insufficient given the number of homes proposed. This will exacerbate out-commuting and traffic congestion on surrounding roads.
- 28) This option will increase the congregation of young people, vandalism and general anti-social behaviour in this area, particularly due to the affordable housing component proposed.
- 29) Development should not go beyond the Development Corporations boundaries.
- 30) This option will restrict the continued viability of the golf course.
- 31) Don't keep 'tacking-on'.
- 32) Finish this mess off before you start elsewhere.
- 33) With the post-war 'Bulge' cohort downsizing, large numbers of houses will become available for refurbishment, subdivision and rebuilding. Combined with refurbishment of the eastern district, it is possible to place high-density appropriate housing in areas where infrastructure already exists, minimising urban sprawl and construction costs.
- 34) This location would be better suited to industries requiring heavy goods movements to maximise the benefits of its location near the M1 and A43.
- 35) This development will threaten wildlife habitat in this area.
- 36) The reasons for rejecting option A1.1 (Northampton East) apply equally to this site.
- 37) This and the other growth options are proposed so that Northampton can acquire city status.
- 38) This option will contribute to Northampton eventually becoming part of Milton Keynes.
- 39) Building new homes will overpopulate the area.
- 40) The area to the rear of Upton grange should be developed, not this site.

Question 31 (Object) continued

- 41) The proposed housing would mean more immigrants.
- 42) These properties will be bought by investors and not families who want to live here.
- 43) Northampton needs a high speed train service to London and the north before further expansion.
- 44) The level of development proposed will result in years of disruption to existing communities, during construction.
- 45) Oppose this development as children are not able to get into schools that their parents desire. This problem will be exacerbated by the proposal.
- 46) Within the last decade, Junction 15, M1 has already been redeveloped and relocated. Why do this again at additional expense?
- 47) House designs will not be sympathetic to existing structures.

General Comments

- 1) Considerable attention needs to be given to the proposed major transport infrastructure solutions, particularly the A45-M1 link to ensure justification and delivery.
- 2) Given the flood risk in this area, it could be developed as a woodland or wetland to promote tourism.
- 3) The plans showing this option are very blurred and difficult to read.
- 4) Northampton South could be enhanced with a rail link at Blisworth on the main line.
- 5) The contribution made by the consented Saxon Avenue development should be recognised in the Core Strategy.
- 6) A reservoir should be built for storm water to drain into. The area around this can be used as a wildlife sanctuary.
- 7) A re-routed A45 should not be built close to existing homes, when it can be built on the abundance of green field land in this locality.

Question 32

Question – Do you support the development of the Preferred Option ‘Daventry South East’?

Summary of Key Points Raised in the Responses:

Support

- 1) The Daventry South East option is supported as there is some potential for growth and employment regeneration.
- 2) The expansion of Daventry is supported and welcomed to support existing facilities in the town centre and opportunities for new retail locations in the new urban extensions.
- 3) Modest development here is welcome, along with A45/A5 improvements.
- 4) Development here would link well with the M1.
- 5) This is welcome and could help reduce A5 traffic flows.
- 6) Supported, the option is aligned with the previous plans.
- 7) The option will increase job opportunity within the area.
- 8) Supported, the option will not cause coalescence of existing rural villages.
- 9) The option will develop land that will not be to the detriment of rural communities, which is important.
- 10) The choice of urban extensions is agreed but care is needed to ensure the most sustainable combination.
- 11) The Daventry South East option is supported providing the necessary infrastructure and transport requirements are provided.
- 12) The option is supported but, growth of high-tech employment should be market driven not forced.
- 13) The option is well related to ‘Fibre Optic Point’ referred to in *Strategic Northampton Economic Action Plan* and a good location for employment.
- 14) High quality employment opportunities would be suited to this location - this should be reflected in the text.
- 15) Restructuring of The Marches employment area, in line with the 2006 Daventry Masterplan, is required to improve connectivity with the town.

Question 32 (Support) continued

- 16) The Daventry South East option could potentially be delivered – although high skilled workforce is not available to allow development of high tech industry, and job to dwelling ratio implies that a reduction in the need travel cannot be achieved.
- 17) The Daventry South East option for Daventry is supported. The role of University at Daventry in delivering employment aims and educational requirements must be stated. iHub and iNet in Sustainable Construction should be reflected in the employment plan for Daventry and land for future expansion of these industries should be made available.
- 18) Daventry South East option supported but allocation should be extended to meet Regional Spatial Strategy (RSS) requirements.
- 19) The Daventry South East option is supported. Other Daventry growth options are unsustainable.

Object

- 1) The principal of growth in West Northamptonshire is not accepted.
- 2) Population growth projections are overestimated. Requirement for this option is rejected.
- 3) The plan should not take into account housing windfall projections in rural areas as this is contrary to *Planning Policy Statement 3: Housing (PPS3)*.
- 4) Housing units delivered beyond 2026 should not be considered as part of this Plan housing targets.
- 5) Expansion of Daventry is not supported.
- 6) Brownfield development and reuse of existing buildings should be prioritised against this option.
- 7) Daventry South East was rejected by inspector at the Local Plan Inquiry. The inspector's comments and constraints upon the site are still relevant.
- 8) This is ribbon development that will increase commuting distances.
- 9) The Daventry South East Option would be an intrusion into the countryside and encroach upon Dodford.
- 10) Not enough employment is provided.
- 11) Insufficient connectivity to the town centre therefore unsustainable.

Question 32 (Object) continued

- 12) The option will not be integrated with Daventry due to separation by existing industrial estate.
- 13) Proposal is the most disconnected option from “work opportunities” at Royal Oak and Daventry International Rail Freight Terminal (DIRFT).
- 14) The scale envisaged will result in detachment from the town centre.
- 15) The ‘Fibre Optic Point’ at Daventry has not been reflected by the Core Strategy.
- 16) The option will not encourage the regeneration of Northamptonshire nor create long term employment opportunities.
- 17) This option will ruin the last remaining undeveloped natural gateway into Daventry.
- 18) Adverse landscape impacts render the option unacceptable.
- 19) Daventry map 6.2 lacks sufficient detail and does not represent topographical changes in the landscape.
- 20) Two areas of forest within the development zone are protected.
- 21) Unacceptable loss of biodiversity.
- 22) Proposal not supported as it will affect badger habitat.
- 23) The option will encourage development northwards toward Country Park.
- 24) Green infrastructure enhancements not required for the area. It is already naturally beautiful.
- 25) The option is not supported due to increased flood risk in the area and all along the Nene valley to Northampton and beyond. Smaller developments are preferable - easier to assess flooding risk and reduced strain in a single area.
- 26) Option rejected - loss of and impact upon setting of historic and archaeological assets (Borough Hill, Burnt Walls, the historic through route, associated with the English Civil War between Northampton and London).
- 27) The option will result in increased traffic congestion through villages.
- 28) The option will result in unacceptable increases in A45 traffic and overburden the A45/A5 junction.

Question 32 (Object) continued

- 29) If the development option is solely intended to fund the A45 by-pass this is considered to be a 'bribe'.
- 30) The A45 by-pass is not grounded in policy, it has not been modelled and contravenes local objective to encourage more sustainable modes of transportation.
- 31) Junction 16, M1 is incapable of accepting increased traffic.
- 32) The road network is incapable of accepting the high levels of out-commuting and traffic accidents will be increased.
- 33) Level of out-commuting is not considered and no contingency plan has been proposed for Daventry if it fails to meet its planned growth levels.
- 34) Development at Crick would be a more appropriate location for growth.

General Comments

- 1) At page 43 the heading should "What the development *purports to* delivers".
- 2) Town expansion at Daventry was to accommodate overspill from Birmingham, there was no London dimension. Amend paragraph 4.0.18 of Emergent Joint Core Strategy accordingly.
- 3) Rural facilities and services must be improved alongside growth.
- 4) Plans must highlight the significance of DRIFT and must make allowances for the future expansion of the site i.e. DRIFT 2. The expansion of DRIFT should be supported by growth at Daventry.
- 5) Good vision will be required to encourage new generation to live, work and enjoy Daventry.
- 6) It is unclear how this option will 'invigorate the historic town centre'.
- 7) Impact on Borough Hill and Burnt Walls Scheduled Ancient Monument needs to be fully considered.
- 8) Development should not extend beyond the Lane linking A45 to Dodford.
- 9) Indicative route of the by-pass must be demonstrated to ensure rural villages are protected.
- 10) Sustainable Urban Extensions should be those best placed to promote 'good communities'.

Question 32 (General Comments) continued

- 11) Development of new church communities should be included in the Daventry options.
- 12) Amenity impacts of potential minerals allocation at Dodford must be considered as part of this option.
- 13) Development must be contained within the development area as outlined by the Development Corporation.
- 14) The ancient Drovers route, east of the industrial estate, should be incorporated as a heritage asset within the option.

Question 33

Question – Do you support the development of the Preferred Option ‘Daventry North’?

Summary of Key Points Raised in the Responses:

Support

- 1) Daventry North is supported and will benefit future generations.
- 2) Supported, provided major road improvements to address M1/A14 junction restriction are implemented and access to employment area to the east of Northampton is improved.
- 3) The expansion of Daventry is supported and welcomed to support existing facilities in the town centre and opportunities for new retail locations in the new urban extensions.
- 4) No nationally designated heritage assets in this area - support for sensitive treatment of the Grand Union Canal green corridor.
- 5) Supported option is close to Daventry International Rail freight Terminal (DIRFT) and Royal Oak, Industrial sites and would add ‘shape’ to Daventry.
- 6) Supported, providing sustainable transport is provided and protection of green space.
- 7) The area can be easily developed.
- 8) Support expansion of housing over employment in this area.
- 9) Providing development is located away from area at risk of flooding and that any flood risk is properly assessed and water provision and management is addressed.
- 10) Support for Daventry North to support the expansion of DIRFT.
- 11) Support for Daventry taking its fair share of growth, if deemed appropriate.
- 12) Providing local community support this option.
- 13) Support providing an employment element is added, inclusion of cultural facilities, commercial centre, education, play areas – Infrastructure provision must be detailed within the Plan.

Question 33 (Support) continued

- 14) Development should be within landscape boundaries; otherwise it should be natural and sustainable.
- 15) General support for the development options at Daventry, however, the University's positive role in enhancing education provision and improving knowledge base industry skill (iHub and iNet sustainable construction) in the area should be clearly stated in the Plan.
- 16) Broad support for Development at Daventry in order to provide more jobs.

Object

- 1) The Plan is based on out of date population projections and cannot be supported.
- 2) No support for expansion of Daventry.
- 3) Regional housing targets can be met without the need to allocate land at Daventry.
- 4) Development of brownfield sites and use of empty properties should be prioritised over the allocation of greenfield land.
- 5) Agricultural land must not be developed.
- 6) This option has not appeared previously as part of the plan preparation.
- 7) The area does not fall within any ward of Daventry and is part of Welton Parish. The Joint Planning Unit has no mandate to allocate land in this area.
- 8) Growth must be contained within the Development Corporation's designated area for Daventry. Development beyond these boundaries is not accepted and would need to be subject to extensive consultation.
- 9) There is a lack of developer interest in Northampton North, should be rejected.
- 10) Middlemore development is still under construction, this is sufficient to sustain Daventry town.
- 11) The proposed/current infrastructure is insufficient to support this level of growth.
- 12) Daventry North was condemned by Inspector at Local Plan Inquiry. These views are still relevant.

Question 33 (Object) continued

- 13) Development in Crick would be a preferable location for development.
- 14) Daventry North option does not meet the vision and objectives of the Emergent Joint Core Strategy. The rejection of this option is equally as valid as many other rejected sites.
- 15) The extent of option is questioned. The Grand Union Canal should provide the physical northern boundary to the site.
- 16) The Daventry North option will impact upon the A361.
- 17) The Daventry North option will impact on the village of Welton and the Grand Union Canal conservation area.
- 18) Growth location rejected due to disconnection from the town centre.
- 19) No support for urbanisation of the Country Park.
- 20) Lack of employment provision means the option cannot be supported – contrary to all other extensions.
- 21) The Daventry North option will result in flood impact on downstream settlements.
- 22) There is a lack of capacity at Whilton Sewage Treatment Works.
- 23) Lack of secondary school places within Daventry to support the development.
- 24) No contingency plans for Daventry, transport problems (by pass funding uncertainties) may restrict growth of the town. These are important planning issues that appear to have been overlooked.
- 25) The option is divorced from the town centre by physical features and distance.
- 26) The Daventry North option will result in loss of wildlife habitat and biodiversity in the area.
- 27) The Daventry North option will result in loss of farm and rural sense of place.
- 28) Development will adversely impact on the quality of life for surrounding village residents.
- 29) Long Buckby and Daventry must not be merged.

Question 33 (Object) continued

- 30) Development must not encroach upon Welton village. Development in this location is contrary to Welton Parish Plan and Parish Design Statement. Development does not accord with these plans as it is not 'restricted infill'.
- 31) Daventry growth diagram is unclear and lacks of topographical detail to provide accurate comment on suitability of Daventry North.
- 32) The topography of the area would cause this option to be highly intrusive on landscape.
- 33) Out commuting figures for Daventry have not been included – this does not give a clear view of whether Daventry is a feeder town or self contained community. New Local Economic Assessment requirements will require this information to be included.
- 34) Ratio of jobs to houses proposed is insufficient.
- 35) The existing transport network cannot cope with growth of Daventry. Growth of Daventry cannot proceed without Weedon-Flore bypass. Traffic cannot be directed onto minor rural lanes.
- 36) Creating sustainable links with Long Buckby will be problematic, development in this area will require longer travel times than the other proposed or rejected options.
- 37) Impossible to incorporate the canal into design as it runs through tunnel and is bordered by woodland.
- 38) Access to this development will be via route across the Drayton Reservoir flood plain.
- 39) This would just be a continuation of estate development like Lang Farm and Middlemore.

General Comments

- 1) Daventry North performs less well in sustainability terms due to distance from the town centre and employment locations. The respondent does not support the location for the short to medium term growth but inclusion as a longer term growth option would require on-site employment provision and high quality public transport cycling and walking links to the town.
- 2) Local political pressure has influenced the decision making process for this site.

Question 33 (General Comments) continued

- 3) Care will be needed not to coalesce villages and sever the landscape between Daventry and Welton.
 - 4) Flore needs bypass.
 - 5) Development should encourage the use of renewable energy sources.
 - 6) Broad support for Daventry growth options. However, Daventry North is weak in terms of locational rational, character, and weight placed on the accessibility in light of the Daventry appeal sites.
 - 7) Re-route of A361 to north west of Daventry would provide a physical boundary for growth and improved access to the employment areas.
 - 8) Leisure and recreation facilities should form part of the 'what the development delivers' section as evidence by the *Sports Facility Strategy* for West Northamptonshire.
 - 9) Consider relocation of the hospital to free land for development nearer the centre and encourage regeneration.
 - 10) Daventry expansion occurred as part of Birmingham overspill, there was no London dimension – this text must be amended.
 - 11) Note should be taken of high pressure gas main that runs through this site.
 - 12) A northern ring road should be prioritised.
 - 13) A detailed archaeological survey would be required before development is permitted.
 - 14) On-site infrastructure e.g. school, pre-school, medical services, convenience stores and open space must be provided with haste.
 - 15) The development could open up the canal waterway.
-

Question 34

Question – Do you support the development of the Preferred Option ‘Daventry North East’?

Summary of Key Points Raised in the Responses:

Support

- 1) This is the preferred location for development provided the country park edge is sensitively managed.
- 2) There are no designated heritage sites within the area and the opportunity exists to incorporate Borough Hill into the green infrastructure network.
- 3) This option is close to existing employment opportunities. In particular, Daventry International Rail Freight Terminal (DIRFT) and Royal Oak Industrial sites.
- 4) This option will add to the shape of Daventry positively and is more likely to house locally based working residents.
- 5) This option could help put Daventry on the map.
- 6) The expansion of Daventry is supported and welcomed to support existing facilities in the town centre and opportunities for new retail locations in the new urban extensions.
- 7) This location offers good accessibility by a number of transport modes to the town centre.
- 8) Monksmoor Farm, which is located within this area, was investigated thoroughly during the Local Plan review and its potential as a housing site established.
- 9) This option combined with others for Daventry provides the best option for the provision of infrastructure.
- 10) This option seems a natural extension of growth toward the A5.
- 11) The scale of this extension is such that it will not destroy the character of Daventry.
- 12) This option’s proximity to the Country Park makes it a very good choice.
- 13) This option is enhanced by the canal arm.
- 14) Much of the infrastructure is already in place.

Question 34 (Support) continued

15) This option connects with the town.

Object

- 1) This growth could be accommodated on brownfield sites, rather than greenfield as proposed.
- 2) This plan is based on out of date and inaccurate growth projections.
- 3) This option would create an intrusion into the countryside and extend up to Dodford.
- 4) Although the strategy aims to 'focus growth close to the urban area of Daventry', the map shows a large extension to the north east.
- 5) This option will urbanise the Country Park in this location.
- 6) This area is at risk of flooding due to its location in flood plains from both the Daventry and Drayton Reservoirs. Any reduction in the ability of this ground area to absorb rainfall will cause greater surface run-off into the brook that enters the Upper Nene. Backing-up of surface water already occurs here (since the development of Lang Farm) and causes flooding on the road that would serve this possible development.
- 7) This area has been designated as a "green lung" into Daventry and provides a wildlife corridor for Daventry Country Park.
- 8) Various fauna and flora habitat would be displaced or destroyed by this option.
- 9) This option would have a significant negative impact upon the Grand Union Canal Conservation Area.
- 10) The road network is inadequate and would need to be upgraded. In particular, the Flore/Weedon bypass.
- 11) Additional traffic would endanger users of this part of the National Cycleways.
- 12) This area cannot accommodate 2000 jobs.
- 13) The housing trajectories produced during the recent public enquiry into this and other sites indicates that the housing numbers stated underestimate the housing potential of this area.
- 14) This development will utilize valuable agricultural land.

Question 34 (Object) continued

- 15) Development of this land will keep tourists and boaters away from Daventry Canal. Tourists will not like the urban landscape, whilst boaters will not like this heavily locked route, unless a boat lift is installed.
- 16) There is an unbalanced job/dwelling ratio.
- 17) The evidence base for this option, particularly with respect to local economic assessment and the Flore/Weedon bypass, is incomplete/absent.
- 18) The plans are blurred and unclear.
- 19) Traffic from this development and utilizing country roads will be detrimental to the “tranquil” setting of existing villages.
- 20) This option will be further away from the centre of Daventry than any other development.
- 21) Cultural facilities, commercial centre, leisure facilities, renewable energy sources and play areas all need to be included in the infrastructure required assessment.
- 22) This option will destroy the visual amenity of Daventry given its highly visible location on high contours.
- 23) The scale of this development is such that it will create its own shopping/community centre which will not invigorate Daventry town.
- 24) This option is unsustainable.
- 25) Too many dwellings are proposed.
- 26) There is an over-reliance on Long Buckby Train Station.
- 27) This option prejudices the opportunity to create a gateway to Daventry along the A45, as suggested in the Daventry Masterplan.
- 28) A chance to re-position Daventry’s economy toward the knowledge industries of the future has been missed here.

General Comments

- 1) Key criteria for selecting urban extensions should be; sufficient critical mass to justify substantial investment in related infrastructure, existing or improved public transport accessibility, scope for high quality complementary land development which would be attractive to the

Question 34 (General Comments) continued

- market; flood risk; minimising environmental impact; and effects on any designated sites, important landscapes and biodiversity.
- 2) Junction improvements these should extend to the three junctions on the A5 – Norton to Whilton, at Buckby Wharf and at Watford Gap. The impact on roads and communities east of the A5 need careful consideration. The transport link from Daventry to Long Buckby Station is welcomed, but the station itself needs significant improvements.
 - 3) This could be a logical development that compliments and completes the urban form of Daventry. However, achieving this requires that it extends no further than the edge of Thrupp Covert, which would mean further expansion to the northeast.
 - 4) Improved roads are needed to link Daventry North to Daventry South East.
 - 5) Daventry should be extended into Long Buckby (so that a main line rail connection can be established) and put a spine road with cycleways, walkways, rapid transit and utility ducts built into it, connecting with the A5 and M1.
 - 6) The B4036 should be moved further east and a bypass around Norton to Whilton Locks established. Combined with cutting off Norton Road to Daventry, this would protect the village and provide a secondary road to Northampton.
 - 7) Footpaths connecting to the canal should also be included.
 - 8) Does “links to existing country park and canal network” actually mean building over it?
 - 9) What are the out-commuting figures for Daventry? Those for Northampton have been shown but those for Daventry are mysteriously missing.
 - 10) Instead of the A45 Flore Weedon Bypass, a new direct link to the M1 should be constructed.
 - 11) A dual carriageway ring road should be established.
-

Question 35

Question – Do you support the development of the Preferred Option 'Towcester South'?

Summary of Key Points Raised in the Responses:

Support

- 1) Option Supported.
- 2) The respondent supports the planned growth for Northampton, Daventry and Towcester, but does not support the growth proposed for Brackley and requests further information.
- 3) The *Emergent Joint Core Strategy* vision will deliver much for the town.
- 4) Growth must be market driven.
- 5) There is reasonable capacity for growth.
- 6) General support for this option although reservations exist regarding infrastructure.
- 7) Supported, as the option offers convenient links with Silverstone employment. Will assist the development of employment and houses towards Silverstone.
- 8) Appears to be the best option, and highway improvements will benefit town centre by removing traffic and encouraging shoppers, tourists and race-goers.
- 9) Direction of growth supported. Reflects the proposals in the draft *Towcester Masterplan*.
- 10) Highways improvement must be capable of accommodating current traffic, growth and Towcester and growth at surrounding areas (e.g. Northampton, Milton Keynes, Brackley, Silverstone, Rugby).
- 11) Will reduce congestion through Towcester centre. The A5 must be de-trunked.
- 12) Public realm improvements must be implemented along Watling Street.
- 13) 40% affordable housing is supported.
- 14) The proposal should specify 3000 homes and at least 3000 jobs.

Question 35 (Support) continued

- 15) The proposal should deliver improved infrastructure provision (improve current schools, 2 new primary schools, 1 secondary school with dual use facilities, improvement to current leisure facilities or improve current, public/private leisure facilities, expansion of sewage works, waste disposal/recycling facilities, public transport improvements and improved linkages with surround settlements.
- 16) Development must be adequately phased.
- 17) Support, although improvements to the A43 at Silverstone must also occur.
- 18) Supported as the only way to fund a by pass.
- 19) By-pass must be dual carriageway, act as a boundary to restrict further growth to the South and be delivered in the first phase of the development.
- 20) Supported, providing the farmland is not high quality.
- 21) One listed building in Wood Burcote would be affected by the scheme and concerns are raised regarding the impact of growth on Towcester town centre.
- 22) The option will encourage social and economic benefits.
- 23) Supported, but growth should be greater than that proposed to support commercial ventures, sustain the Grand Prix, allow sufficient critical mass to provide the necessary highway improvements, other infrastructure and reduce the pressure on Northampton South East. Additional housing and employment will address the 5 year land supply deficit and reduce out-commuting.
- 24) This is the most suitable, sustainable and integrated development option.
- 25) Enhanced services will benefit wider rural hinterland.
- 26) This option accords with the Regional Spatial Strategy (RSS) requirements.
- 27) Will encourage regeneration of Towcester.
- 28) Will indirectly encourage further job creation in the area.
- 29) Will encourage sustainable transport and improve public transport services and patronage.

Question 35 (Support) continued

- 30) Support, provided that the historic, market town character of Towcester is not affected.
- 31) Support, but the size of the proposal should be reduced. Topography should limit the scale of the proposed extension e.g. the ridges and hills around Wood Burcote. At the current scale it will impact on identity and cohesiveness of Towcester.
- 32) Development must be within development boundary as defined by the West Northamptonshire Development Corporation (WNDC). Any development outside this area must be subject to thorough consultation.
- 33) Support for the proposal, as it will improve recreation facilities in accordance with the Sports Facilities Strategy and will provide an improved impression of the town for visiting sporting teams.
- 34) Will improve road safety and connectivity of the town centre.
- 35) This is a long-term objective, but the short-term benefits should not be understated.
- 36) More detail must be provided on the proposals for the town centre and for must account for development at Moat Lane.
- 37) Support, but only to save villages from overdevelopment.

Object

- 1) Growth of Towcester is not supported.
- 2) Development should be contained by the existing road network.
- 3) The growth projections on which the Plan is founded are out dated. The extension cannot be supported.
- 4) Brownfield sites and disused properties must be developed prior to greenfield sites.
- 5) Growth should be concentrated at Northampton.
- 6) Infrastructure proposals are too lightweight to support this level of growth.
- 7) Scale is too large; support for smaller local developments is preferred.
- 8) Concern regarding flood risk.

Question 35 (Object) continued

- 9) Site is not sustainable and is more than 5km from a train station.
- 10) Growth is not needed; it is unsustainable and will increase traffic.
- 11) This option will destroy the character of Towcester.
- 12) The detailed representation from the Wood Burcote Residents Association is summarised below:
 - Concern regarding the scale and form of the extension.
 - The submitted planning application should be postponed as it pre-empted the *Emergent Joint Core Strategy*.
 - Road proposals do not meet the requirements to improve Towcester. A 40mph limit, single carriage way and multiple roundabouts will not encourage use of road. It will increase the accident rate and will not divert traffic from Towcester Centre.
 - The proposed highway will not accommodate the growth of Towcester, current traffic and increased traffic due to growth at neighbouring locations. It is not sufficient to be a trunk road and the Highways Agency will be reluctant to de-trunk A5 through Towcester centre.
 - The bypass will increase noise and pollution and increase congestion onto A43, which is unacceptable for future residents and current residents at Wood Burcote.
 - There is no policy/requirement for developers to provide appropriate advanced commitments to job creation in Towcester prior to the development of houses commencing.
 - Wood Burcote lane should be restricted to residents only and use should not be permitted for development/construction traffic.
 - Construction operation time restrictions should be applied.
 - A green buffer of no less than 30m should be imposed around Wood Burcote.
 - The local bat population should be preserved.
 - The extension appears to be led by developers rather than planners.
 - Loss and severance of public rights way.
 - No extra street lighting in Wood Burcote and no floodlights on sports pitches
 - The playing field clubhouse should be located away from housing.
 - Will envelop Wood Burcote resulting in the loss of village character. This is contrary to the law requiring the protection of distinct villages.
- 13) Insufficient detail about “*essential strategic improvements to the A43 junction*”. Essential implies the absolute minimum.
- 14) Development must not be on agricultural land.

Question 35 (Object) continued

- 15) Extension is excessive, unjustified and unsustainable. Growth is not considered consistent with guidance within Regional Plan relating to development at Rural Service Centres. The explanation as to why the growth is appropriate or deliverable is inadequate.
- 16) Growth of the scale proposed will reinforce Towcester's status as dormitory settlement for larger settlements.
- 17) Growth should be at Brackley where the employment base is located.
- 18) The scale of growth at Brackley and Towcester exceeds the residual housing requirement for South Northamptonshire, which would mean there is no scope to allow development in rural areas and is contrary to the Council's Interim Housing Policy.
- 19) Support for Towcester South, but not in its current form. Support for development near Shacks Barn. This will allow for the existing bridge to be used for a by pass and would be a suitable option for employment development. Not prudent to rely on knowledge base industry – this option plans for industrial uses that are still required.

General Comments

- 1) The feasibility of creating a green infrastructure route to Banbury, Towcester and Milton Keynes is questioned.
- 2) The regeneration of Towcester will require a radical improvement in public transport e.g. transport from the villages into Northampton in the evening which is currently non existent.
- 3) The Maps relating to Towcester South and the rejected options for Towcester are insufficiently clear and do not show all the core development options. For example, is the Towcester South area consistent with the Towcester Vale development proposal?
- 4) The highway improvements will produce longer travel times from A43/A5. Using existing routes through Towcester will be easier and will not alleviate congestion.
- 5) More detail required regarding the proposals for the Town Centre and the Moat Lane area.
- 6) Greater emphasis must be placed on design quality in the urban extensions, particularly for Towcester Vale.

- 7) Government funding should be used for bypass not developer contributions. The A5 is increasingly used for diverted traffic on M1. This would allow developer funds to be better utilised elsewhere.

Question 35 (General Comments) continued

- 8) Concern that the Tove Roundabout (A5/A43) will not have capacity to accommodate additional traffic.
 - 9) Development will not be complete within the Plan period.
 - 10) Development must not create out-of-town retail parks that will detract from Towcester town centre.
 - 11) School facilities must be improved prior to development to encourage families to move to the area and provide for the first new residents.
 - 12) The Towcester strategy does not adequately recognise the role of the University in providing training and skills to meet the aspirations of knowledge based industry and the links with Silverstone to provide state-of-the art educational campus.
 - 13) Consideration should be given to a park and ride at the A45/A5 junction.
 - 14) This is a matter for local residents and planners should take account of the views of local people in the target areas.
 - 15) Concern expressed regarding the impact of growth at Towcester on traffic flows along the A5 and the capacity of the A5/A508/A422/Old Stratford interchange. This junction will need to be improved and grade separated.
 - 16) The development must be undertaken in conjunction with the *Towcester Masterplan*.
-

Question 36

Question - Do you support the development of the Preferred Option 'Towcester Moat Lane'?

Summary of Key Points Raised in the Responses:

Support

- 1) Regeneration of this area is important for Towcester.
- 2) This is an historical area that deserves regeneration and is capable of reaching its potential, provided the relief road is provided.
- 3) This option is reasonable and there are no obvious drawbacks.
- 4) This site is mainly brownfield and therefore should be used.
- 5) This provides an opportunity to upgrade town centre, which would be enhanced by pedestrianisation. The upgraded town centre could include new services that are essential for its success.
- 6) Inclusion of open space, parkland and recreation facilities is supported.
- 7) This development enhances the area whilst retaining the market town structure that already exists.
- 8) The development is supported, but the retail provision should be aimed at smaller, specialist shops so that it complements the town centre.

Object

- 1) This option would destroy a green area of heritage value.
- 2) No further expansion should be allowed.
- 3) This option is unsustainable.
- 4) Development at Silverstone would be preferred.
- 5) Insufficient information has been provided to form an opinion on this site.
- 6) The strategy for Towcester fails to translate the importance of the University as a major contributor to economic growth.

Question 36 continued

General Comments

- 1) This area is susceptible to anti-social behaviour and it is vital that the design of this area is high quality. Opportunities for crime and anti-social behaviour should be designed out.
 - 2) This is a small area that could easily be developed privately.
 - 3) Local community and voluntary groups need to take an active role in helping manage growth.
 - 4) The A5 Bypass is fundamental to this and other growth options in Towcester.
 - 5) Attention needs to be given to integrating the old and new communities created by the scheme.
 - 6) There should be a bus interchange near Bury Mount.
 - 7) Should be done in conjunction with the *Towcester Masterplan*.
 - 8) This is a matter for local residents.
-

Question 37

Question – Do you support the development of the Preferred Option ‘Brackley North’?

Summary of Key Points Raised in the Responses:

Support

- 1) The option is supported subject to the following requirements:
 - Relocation of the Cottage Hospital, Ambulance Station and Swimming Pool.
 - Improved facilities for the football club.
 - Allotment provision, circular walk, extension of St James Lake and cemetery extension.
 - Major improvements to the A43/ A422.
 - Improvements to internal and external bus services.
 - Flood risk assessment and strategy.
- 2) Supported - Option is appropriate in terms of land availability, communication and access. Concern is raised regarding the capacity of the A43 to accommodate the extra traffic when development is complete.
- 3) The proposal does not affect any nationally designated heritage assets, but the ability of town centre to accommodate growth is a concern.
- 4) North Brackley requires significant investment and the option is supported, provided the infrastructure commitment is fulfilled.
- 5) Access to Brackley from the A43 via Halse Road and Redstone Road will need to be upgraded.
- 6) The Core Strategy must refer to the following community infrastructure requirements: At least one new Primary School, contribution to existing primary schools and secondary schools, creation of open space and play space, indoor leisure provision, well-being centre and competition pool, extension to sewage works, waste disposal and recycling facilities, private leisure provision, additional town centre parking, improved public transport, and access via saw mills site.
- 7) Sustainable links with the town centre and services will be required.
- 8) Support the commitment to provide sport and recreation facilities.
- 9) Support subject to the provision of doctors and dentist services.
- 10) Will bring economic and social benefits to the area.

Question 37 (Support) continued

- 11) Will relieve pressure to develop at Northampton South East.
- 12) Support, but the Great Central Rail Track must not be developed to allow for potential reopening in future.
- 13) A natural growth direction, which will complete the urban form and limit the loss of attractive countryside.
- 14) Agree, provided there is local support.
- 15) Support for limited growth of Brackley the preferred option should be reduced by a third.
- 16) Development must be market driven.
- 17) The principle of Brackley North could be supported providing the inclusion of substantial structural landscaping.
- 18) Will increase demand and support local services in Brackley and encourage further investment in the area.
- 19) Support for mixed-use development to support Brackley north and north east. The decline of town centre has been result of restrictive regeneration policies in this part of Brackley. Regeneration of the town centre will be facilitated by delivering new retail opportunities outside of these areas. There is currently an insufficient supply of land in this area to accommodate the range of retail that is sought by the plan.
- 20) Brackley has capacity to sustain further growth to north round to west and southwest without impacting on existing settlements.
- 21) Development must be contained within existing road network.
- 22) No significant barriers to early release and no major infrastructure works are required to open up the site for development.

Object

- 1) Development to the north will accentuate the imbalance of housing to the north of Brackley and will increase the distance required to travel to the town centre.
- 2) Scale of growth is too large. Small developments could mean less is needed.

Question 37 (Object) continued

- 3) The growth projections on which the Plan is founded are out dated. The extension cannot be supported.
- 4) There is no 'network into the town centre'. The road network and parking provision in town centre is insufficient to cope.
- 5) The ratio of jobs created to houses built should at a minimum of 1:1.
- 6) This is not a brownfield site and cannot be supported. Development of brownfield sites must be prioritised above greenfield sites.
- 7) Brackley is already big enough for its infrastructure.
- 8) No support for further developments.
- 9) Rural lanes (Halse / Radstone Road) will not be able to support this level of growth.
- 10) No contingency options are specified for development if the current extensions at Brackley are not delivered within the Plan period.
- 11) Option B, which has not been fully appraised predetermines the selection of Brackley sites. Reappraisal of the preferred choices and rejected site should be considered. Support for site to North West of Brackley.
- 12) The option is unsustainable.
- 13) Development at Silverstone would be preferable with direct links to circuit that generates employment and therefore housing.
- 14) Brackley East will provide for local need. Other extensions i.e. Northampton 5 (south) could accommodate growth.
- 15) Archaeological resources must be protected.
- 16) The discounted *Brackley Option 1 (Brackley South)* would be preferred.
- 17) Will change quality of life for inhabitants of West Northamptonshire.
- 18) No implementation/action plan is provided to support proposals.

General Comments

- 1) Unsure whether Brackley North can be supported.
- 2) Will need to address the problem of low water pressure.

Question 37 (General Comments) continued

- 3) Lack of secondary school provision is a concern and will need to be considered.
 - 4) Extension must ensure cohesion of the entire town.
 - 5) Sewage problems exist at Burwell Garage/Jarns Court.
 - 6) Brackley North is within close proximity to the Helmdon disused railway Site of Special Scientific Interest (SSSI) which should be enhanced through any development of this site. The Wildlife trust should be involved in this respect. Pre-submission draft should require ecological enhancement and green infrastructure contribution as an integral part of each urban extension.
 - 7) The Core Strategy must align with the draft Brackley Masterplan once completed.
 - 8) The inclusion of opportunity sites in town centre would be welcomed.
 - 9) Concern that the 'minor improvements to A43/A422' underplays the need for investment around the A43 at the Sawmills site.
 - 10) Development should follow a sequential approach to development which be ordered thus; Sawmills site, Turweston Road, Extension to Magdalen College, Brackley Pool Site, Brackley Leisure Centre Site.
 - 11) Residential expansion should only be at North Brackley.
 - 12) This is a matter for local residents.
-

Question 38

Question – Do you support the development of the Preferred Option ‘Brackley East’?

Summary of Key Points Raised in the Responses:

Support

- 1) A good vision that will produce housing, education, healthcare, transportation and leisure facilities in the future.
- 2) There are lots of empty industrial units around Brackley East that would be revitalised by this development.
- 3) New jobs would be welcome.
- 4) This area is close to the town centre, residential areas and transport (e.g. the A43) and therefore ideally suited to employment uses.
- 5) The need for open space sport and recreation infrastructure is commended.
- 6) This proposal does not affect any nationally designated heritage assets.
- 7) This option leaves the former Great Central Rail track free of development for and possible future reopening.
- 8) Support as jobs will be collocated with housing.
- 9) This is a sensible “infill” within the curtilage of the A43.
- 10) Support, but development should be market driven.

Object

- 1) Opposes the use of this area solely for employment use.
- 2) This area contains wildlife, such as badgers, that would be endangered by development. In particular, the railway embankment is the last known site for the small blue butterfly.
- 3) This is not a brownfield site.
- 4) Major improvements will be needed to the High Street, Northampton Road, A43 and A422 to support the increase in commercial traffic.
- 5) Brackley is big enough as it is.

Question 38 (Object) continued

- 6) Growth should only occur at the rate of natural population growth.
- 7) Limiting this urban extension to purely employment undermines the ability of the plan to respond to the changing needs of the community. As such, this area should be designated for mixed use.
- 8) The separation of employment and housing may lead to these areas being unoccupied at night and during the day respectively. This would lead to an increase in fear of crime.
- 9) Development at Silverstone is more appropriate as it directly links to the race circuit, which is a major generator of employment and therefore housing.
- 10) Development should be spread evenly across West Northamptonshire, rather than in the urban extensions specified.
- 11) The industrial requirement could be met on the Sawmills sites, rather than using greenfield land.

General Comments

- 1) Brackley needs a bypass before development can proceed.
 - 2) This section should set out a sequential approach to site development.
 - 3) Are the jobs proposed short term construction ones or long term employment?
 - 4) A means must be established to discourage retail enterprises from establishing in industrial zones to avoid high rental costs.
 - 5) Substantial structural landscaping should be an essential component of this option.
 - 6) This is the most appropriate location for B use class employment that would strengthen/diversify the economic base of West Northamptonshire by providing opportunities for knowledge based industries and environmental technologies.
 - 7) This area could include a large clothing/household retail store, which might keep shoppers within the town. This would help regenerate smaller town shops.
 - 8) A lorry park should be provided and lorries restricted from using the High Street.
-

Question 39

Question – Do you support the policy approach for the hierarchy of centres?

Summary of Key Points Raised in the Responses:

Support

- 1) The intention to resist further retail development outside the central shopping area or other defined centres is supported.
- 2) This approach is reasonable and logical.
- 3) This policy approach ensures that both new and existing communities are considered in the Core Strategy. It is encouraging that an assessment of the neighbourhoods and their respective centres will be undertaken to inform policy.
- 4) Retail centres should be as near to residential areas as possible.
- 5) Market Town regeneration supported.
- 6) This approach reflects the existing role of these centres and the requirements of the Regional Spatial Strategy (RSS).
- 7) It is logical that the main town of the county should be Northampton.
- 8) There needs to be a main centre and this approach reinforces the existing centres.
- 9) This approach will help regenerate town centres.
- 10) Support provided the retail centres have sensible car parking policies.
- 11) Supports the hierarchy, provided sensitive development is not located near industry.
- 12) Out of town centre development has damaged Northampton Town Centre.
- 13) Identification of a separate retail hierarchy for Northampton is appropriate, as is its exclusion of Sixfields.
- 14) Agree that Daventry and Towcester should have enhanced roles at a local level.
- 15) Northampton town centre needs major modernisation and the arrival of retail outlets to encourage shoppers to think of it as a destination of choice.

Question 39 (Support) continued

- 16) Out of town retail development may adversely affect areas beyond West Northamptonshire, such as Wellingborough.
- 17) Focussing further retail development towards Northampton will help to support and strengthen its role as the primary retail centre within the area.

Object

- 1) Social and retail centres should be provided from the outset and new communities developed around them. The respondent is not convinced that the satellite retail areas are damaging town centres and unless there is substantial and imaginative development of the town centres, the existing retail parks may have to be developed further or even added to.
- 2) The notion of Northampton as a desirable centre is pure fantasy. Traffic improvements cannot be made without demolishing parts of the old town and basing the alternatives upon modal shift is a foolish plan that cannot be substantiated by any expert in the country.
- 3) Out of town retail succeeds by virtue of the extensive provision of car parking and that town centre locations cannot always provide this. This is a contrast with town centre retail development and improved public transport will not provide the same level of convenience.
- 4) Each centre should be independent and provide facilities for local communities.
- 5) This section is too vague and more information is needed.
- 6) It is questionable whether Daventry Town Centre is a principal centre for retail, employment and housing development given there are a number of housing and employment areas outside Daventry's centre.
- 7) The policy approach is self-contradictory as on the one hand it discourages out of town retail and on the other it states that retail is a key aspect of Northampton South East.
- 8) How will this be funded?
- 9) Northampton could become a major retail attraction if and out of town shopping centre were built around a junction of the M1 motorway.
- 10) District centres are an excuse for suburbia. One supermarket will not satisfy consumer demand and is monopolistic. What is needed is good, environmentally sound public transportation to a good town centre.

Question 39 (Object) continued

- 11) The proposed policy approach effectively places a moratorium on edge of centre retail development. This is contrary to *Planning Policy Statement 6: Town Centres* (PPS6) and *Planning Policy Statement 4: Economic Growth* (PPS4), which allows such development where it meets certain tests (e.g. retail need, the sequential approach and development impact).
- 12) This policy prevents competition which is needed to make town centres healthy.
- 13) Daventry was chosen as a sub-regional centre in the Regional Spatial Strategy 8 (RSS 8). However, it is severely limited by its infrastructure and pales in comparison to the competition from other towns like Milton Keynes. As such, contingency planning is therefore needed.
- 14) Sixfields is an important shopping and leisure centre in the West of Northampton, but is completely ignored by this strategy. Designating it a District Centre would allow it to secure more sustainable patterns of travel in meeting local shopping needs and would provide the Council with the greatest scope to influence and control future development.
- 15) The proposed hierarchy ignores smaller centres such as Link Road and St Davids. Furthermore, the hierarchy does not allow for the development of Neighbourhood Centres in areas such as East and West Hunsbury and Grange Park.
- 16) This policy seems aimed primarily at Northampton.
- 17) No reference is made to the fact that new development may necessitate a need for new retail centres. Policy “*Milton Keynes South Midlands South Midlands Sub Regional Strategy (MKSM SRS) Northamptonshire 2*” within the *East Midlands Plan* indicates that these new centres may be needed.
- 18) Brackley needs further retail and employment facilities, contrary to the conclusions reached in Appendix E and the *West Northamptonshire Retail Study*. Given the paucity of land in the town centre however, this can only be provided in an out of town centre location.
- 19) Northampton, Daventry and Towcester cannot sustain or support further large-scale development.
- 20) The CACI [Retail] Study used to support this policy approach is flawed. Specifically, it is predicated on the assumption that all out-of-centre retail-offer is bad and ignores other important factors, such as competition from centres like Milton Keynes.

Question 39 (Object) continued

- 21) Resisting new retail development across Northampton until post 2016 will have a negative effect on the ability of the town centre to claw back trade from other centres, such as Milton Keynes.
- 22) There is an overreliance in the hierarchy on the Grosvenor Centre extension providing the bulk of retail provision. In particular, it is unlikely the Grosvenor Centre will be opened by 2016. This is also the date indicated in the Central Area Action Plan, which is therefore inconsistent with the Core Strategy.
- 23) This approach ignores rural areas.
- 24) Mereway District Centre should be retained as a District Centre as it is consistent with the definition in *Planning Policy Statement 6: Town Centres* (PPS6). Significant investment has been made in the centre and it may decline if not designated.
- 25) Facilities need to be decentralised ready for the coming reduction in personal travel.
- 26) Overdevelopment will ruin the character of Northampton.
- 27) The terminology used in Tables 6.5 and 6.6 is inconsistent with that used in *PPS6*. In particular, the definitions used appear more closely related to the urban fabric, rather than their retail role. As such, all centres listed in Table 6.6 should be redefined as local centres.
- 28) A stronger policy framework is needed for the delivery of a new centre to serve Northampton West given the existing evidence base. Otherwise, the framework may be found unsound.
- 29) More recognition needs to be given to the ability of local centres to meet local need and their ability to support a rural renaissance.
- 30) It is not the role of a Core Strategy to provide detail enough to identify Neighbourhood Centres.

General Comments

- 1) Greater attention needs to be paid to those communities, especially villages, near to Sustainable Urban Extensions.
- 2) Daventry should have a distinct retail role to recognise its sub-regional centre status.
- 3) Further work should be undertaken on identifying strategic priorities for Daventry and Towcester town centres.

Question 39 (General Comments) continued

- 4) Do these designations take into account what may happen as a result of future development?
 - 5) Further work is required in relation to Northampton. This would include the location of the High Street and neighbourhood locations which are unclear. The hierarchy should assist with sustainable transport movements through enabling people to meet their local shopping and service needs within close proximity of their homes. *The Emergent Joint Core Strategy* should set out what uses would be acceptable at a local, district and city centre scale.
 - 6) A major reason why Northampton Town Centre is not competitive with out of town retail is convenience. Shoppers can park free, relatively close to where they buy goods and have the free use of trolleys at out of town retail centres. This contrasts with the situation in town centres.
 - 7) The hierarchy of centres set out in Table 6.5 should include a ranking column and numbering of each centre to ensure readers are in no doubt of the purpose of the table.
 - 8) Retail centres tend to form their own size and ranking depending mainly on the number and habit of their customers. As such, a policy on hierarchy should not be too rigid.
 - 9) Should other areas (e.g. Abington, St Catherine's Hospice) be considered?
 - 10) Town centres in rural areas must have adequate long and short term parking facilities given the relative paucity of public transport.
 - 11) There needs to be recognition in the Core Strategy that South of Towcester will include the provision of a new local centre and employment areas.
 - 12) Northampton centre needs a redesign. The bus station should be demolished and more housing built, rather than more shopping for the Grosvenor Centre.
 - 13) Traffic congestion and the absence of free parking need to be addressed to make Northampton a desirable shopping area.
 - 14) Work on the *Sixfields Area Action Plan* should be recommenced.
-

Question 40

Question – Do you support the policy approach for the existing and future neighbourhoods?

Summary of Key Points Raised in the Responses:

Support

- 1) Policy approach will entrench community cohesion and improve neighbourhoods.
- 2) Sense of neighbourhood identity must be encouraged - people should also feel part of the wider community.
- 3) Essential for a stable society.
- 4) Required to protect rural identities.
- 5) Support. However, have all Neighbourhoods been considered (Abington, Poets)?
- 6) Inclusive development is good for communities.
- 7) Reference should be made to providing open spaces and sports/recreation facilities.
- 8) Neighbourhood groups/panels should be set up to encourage input into what is needed by the inhabitants various neighbourhoods and to shape policy
- 9) Will make rural communities more sustainable.
- 10) Only some are reasonable.
- 11) Will improve quality of life.
- 12) Principle of this approach is supported and can be incorporated in designed new neighbourhoods through sustainable urban extensions.
- 13) More localised amenities will support the older population.
- 14) Supported, provided infrastructure, police, fire services, and public transport is provided in close proximity.
- 15) Providing neighbourhoods are balanced – who decides whether they are balanced?
- 16) Support principal, although, more detail is required.

Question 40 (Support) continued

- 17) Centres must be promoted with adequate social and cultural vibrancy.
- 18) District centres must be accessible to meet the general needs of the local catchment.
- 19) The approach must not be limited to urban area but should be applied across the whole of West Northamptonshire.
- 20) Policy must be flexible so not to prevent adoption of new styles, processes and technologies.

Object

- 1) Existing neighbourhoods should be improved before new ones are built.
- 2) It takes people to create communities not policies.
- 3) Village communities must be protected; they are the only real communities left. Plan seeks to destroy these communities.
- 4) Not supported, small-scale development will ease transport demands.
- 5) This is just a list of words it does not form a cohesive policy description.
- 6) Unclear what '*legible pattern of streets*' means.
- 7) No information pertaining to villages / rural areas.
- 8) Areas must develop naturally.
- 9) New development sites at Northampton must be completed and adequate services provided before development is brought forward.
- 10) What will be the social and commercial centre of the new development?
- 11) Community spirit will disappear with these proposals.
- 12) Not supported if the result is a change in mix and tenure of existing quality residential areas.
- 13) The settlement hierarchy must be defined before the approach can be supported. The hierarchy must be part of a Development Plan Document (DPD) where it will undergo vigorous testing and consultation.
- 14) Towcester and Brackley are each one neighbourhood.

Question 40 continued

General Comments

- 1) Provide a church-come-community centre to encourage a sense of community identity.
 - 2) Undecided whether the policy is achievable.
 - 3) Local authority structure is sufficient.
 - 4) Local communities must be involved in consultation and contribute toward the formulation of policy.
 - 5) Northampton centre is uncompetitive – parking provision and price drives encourage shoppers to Milton Keynes.
 - 6) Development that envelops small villages is resisted. They must be protected by substantial green belts.
 - 7) Growth levels will create dormitory settlements.
 - 8) Implementation of this policy is questioned. Clarification required as to whether this is applied to new developments.
 - 9) An assessment of what make a good neighbourhood work is essential to ensure that the proposals provide functional and well-balanced neighbourhoods when completed.
 - 10) Forced growth will not produce the community spirit that is sought.
-

Question 41

Question – Do you support the policy approach for the rural settlement pattern for West Northamptonshire?

Summary of Key Points Raised in the Responses:

Support

- 1) The policy and vision are supported.
- 2) This approach should be beneficial.
- 3) This policy approach provides the correct level of development for the local area.
- 4) This policy approach protects the countryside and villages.
- 5) Villages are what make Northamptonshire great.
- 6) The criteria approach outlined for deciding where housing will be allowed is supported.
- 7) All rural settlements need some modest expansion to maintain viability.
- 8) This policy approach will make rural communities more sustainable.
- 9) Existing rural settlements need further support.
- 10) The focus on sustaining local schools is positive

Object

- 1) This is not a cohesive plan as it does not support green infrastructure or cultural heritage.
- 2) This is too vague. It only hints at the alternative proposals that would be supported, and doesn't go far enough toward protecting villages.
- 3) This policy is too restrictive as it makes no allowance for farm and rural diversification, conversions of redundant farm buildings, new farm buildings themselves and other structures that must be sited in the countryside.
- 4) Villages are the only real communities left and this plan would wipe many of them out.

Question 41 (Object) continued

- 5) The level of housing growth proposed on green field land will destroy these villages.
- 6) It is not possible for rural areas to be self-sustaining in the way proposed.
- 7) This policy approach has not involved consultation with local elected bodies.
- 8) Development in rural areas should be limited to that required and needed by local communities.
- 9) This policy approach will create 'mini towns' with other areas falling into decline.
- 10) Account has not been taken of the need for recreational, cultural or heritage facilities in the countryside.
- 11) This policy could spell the end of settlements not considered sufficiently sustainable. Furthermore, the need to be sustainable may apply unnecessary development pressure on villages.
- 12) South Northamptonshire Council's *Interim Rural Housing Planning Policy* states that villages such as Courteenhall, Gayton, Milton Malsor and Rothersthorpe do not have capacity for further housing development.
- 13) The proposal will destroy the character and way of life of several ancient villages.
- 14) Paragraph 6.9.1 states that only a small percentage of residents live in rural areas. This is not true (i.e. 68% of Daventry's residents and 75% of South Northamptonshire's residents live in rural areas).
- 15) The Rural Areas form a large part of the West Northamptonshire area and support a range of communities. Leaving identification of the rural area and definition of Key Rural Service Areas to a later *Site Allocations Development Plan Document (DPD)* is therefore confusing and poor planning.
- 16) The terminology used is confusing.
- 17) The evidence base for this policy approach is incomplete.
- 18) There is no policy or policy approach to be considered.
- 19) It is wrong to surround villages with housing.
- 20) This policy should be widened to bring forward proposals to support in a proactive manner a vibrant and diverse rural economy.

Question 41 (Object) continued

- 21) Some residential development should be allowed in reasonably sustainable villages, not just Key Rural Service Centres. The policy approach in its current form is too restrictive.
- 22) This policy needs to define a settlement hierarchy for consideration.
- 23) There seems to be a fundamental underlying view that rural settlements are not 'sustainable'. More consideration needs to be given to using small increases in rural settlement size as a way to make a large overall impact on required growth.
- 24) Sustainability should not be limited to reducing the need to travel by car. Cars are the primary transport mode in rural areas.
- 25) This policy approach needs to go further to promote regeneration and rural employment and tourism.
- 26) The quantum of new homes required to be accommodated at "*Key Rural Service Centres*" needs to be identified in this policy approach.
- 27) The policy approach does not incorporate a sufficiently robust strategy to deliver sustainable levels of growth in key rural settlements.
- 28) This policy does not go far enough. It should not just settle for development at the most sustainable locations but should seek to make all locations more sustainable.
- 29) There should be greater emphasis on what provision will be made for housing and employment growth within the villages.
- 30) The general policy of urban concentration may mean that a five-year land supply cannot be maintained given the greater lag time in developing brownfield sites. As such, a greater focus on developing village sites needs to be made.
- 31) Affordable housing should not be built everywhere, particularly in the countryside.

General Comments

- 1) Rural service provision can be facilitated by good transport and communication links with larger centres.
- 2) Will the Buckingham Canal, which is largely rural, be protected?
- 3) The term "*Sustainable*" needs to be defined.

Question 41 (General Comments) continued

- 4) More detail needs to be provided on the rural-urban housing split to guide developers and local authority planners.
- 5) This policy approach also needs to address the potential decline of smaller villages as a result of development at larger villages.
- 6) Conservation area designations, listed buildings, historic houses, parks and gardens, scheduled ancient monuments and landscape designations are a strategic resource for the whole sub region.
- 7) Local communities must be included in any consultation.
- 8) The policy approach should be expanded to allow for growth villages which act as key rural service centres in their own right, or where they are close to major employment areas, so that housing and employment needs can be met.
- 9) Care needs to be taken not to spoil attractive villages.
- 10) An exception policy needs to be included so that development outside the policy area can be approved in exceptional circumstances.
- 11) In many rural communities, incomes are not sufficient to support living costs.
- 12) Detailed consideration will need to be given to the particular circumstances of individual settlements in terms of both their functions and environmental qualities.
- 13) Each village needs to be protected by a substantial green belt.
- 14) Affordable homes are needed to make all villages sustainable.
- 15) Proper and robust criteria are needed to determine which settlements are Key Rural Service Centres.
- 16) Houses should be developed within one mile of a primary school.
- 17) There must be some flexibility. Services should not be concentrated only in key rural service areas.
- 18) Additional physical and social infrastructure will be needed.
- 19) Why is there a need to define Key Rural Service Centres and what scale of development is envisaged?
- 20) Passenham and Old Stratford should be considered as Key Rural Service Areas given their sustainable locations and high amenity levels.

Question 41 (General Comments) continued

- 21) Long Buckby should be categorised as a sustainable location that provided a wide range of services, facilities and employment opportunities.
- 22) Silverstone is a sustainable settlement capable of accommodating more growth. The *South Northamptonshire Interim Rural Housing Policy (IRHP)* fails to acknowledge Silverstone Circuit as a strategic location for employment growth.
- 23) Existing and already planned employment opportunities should also form part of the assessment of rural hierarchy.
- 24) Kilsby ought to be classified as one of the Key Rural Service Centres for the District.
- 25) Boughton should be considered a Key Rural Service Centre given the high level of services and amenities within its surrounds.
- 26) Care should be taken not to limit the amount of rural housing development to the extent that young people are forced to move elsewhere.
- 27) Crick ought to be classified as the primary Key Rural Service Centre given its high levels of services and amenities.
- 28) The approach taken in the adopted Interim Rural Housing policy to identifying the sustainability of villages is recommended.
- 29) The majority of villages have few if any development opportunities as all are effectively constrained by very tightly drawn village confines. This makes land values very high and means villages tend to be occupied by the elderly or wealthy.
- 30) 20% of the residual housing requirement should be allocated to both Daventry and South Northants.
- 31) It is not realistic to assume that more agricultural dwellings will be needed. Further thought needs to be given to the development of this rural policy.
- 32) The policy approach lacks detail and does not deal with the issues.

Question 42

Question – Do you support the policy approach for the regeneration of communities across West Northamptonshire?

Summary of Key Points Raised in the Responses:

Support

- 1) Should be addressed through Brackley Masterplan.
- 2) Policy approach supported – *Emergent Joint Core Strategy* must acknowledge the need for high quality/high density development in urban centre.
- 3) Support for regeneration of Billing ward. Further evidence of the intent and funding required to support this regeneration is needed.
- 4) Work with other authorities will be needed to achieve this initiative.
- 5) Success will depend on effective community involvement.
- 6) Regeneration messages in the Core Strategy must be consistent with those that partners are already working on. Core Strategy needs to be consistent with priorities of Crime and Disorder Reduction Partnerships.
- 7) Policy approach accepted - policy must not be too prescriptive.
- 8) Support for regeneration of eastern wards.
- 9) Supported – lessons from previously built large developments in Northants must be learnt.
- 10) Approach supported providing current infrastructure and services need must be met first.
- 11) Areas needing support have been identified.
- 12) No indication of how this policy will be achieved.
- 13) Criteria used to identify areas are questioned.
- 14) Regeneration would reduce pressure to build on Greenfield sites.
- 15) Sport, open space and recreation must play an important role in the regeneration of these areas. Sport will aid regeneration by engaging the communities, creating training and employment opportunities, and bring economic and health benefits.

Question 42 (Support) continued

- 16) Dilapidated council housing must be replaced and vacant properties brought back into use.
- 17) Target regeneration to local need.
- 18) No plans to develop and regenerate Northampton as a vibrant county town and commercial hub.
- 19) Supported, must capitalise on brownfield sites. More focus required on youth leisure and recreation.
- 20) Daventry is identified as a *Regional Regeneration Area*. This has not been reflected adequately in the plan. Emphasis is now placed on Brackley and Towcester which devalues the regeneration of Daventry. Plan must reflect the regeneration needs of the whole area equally.
- 21) Support improvements to north and east. Questioned why largest investment is directed to the south east of Northampton.
- 22) Support the creation of new houses and jobs to allow young people to work in their home towns and reduce car travel.
- 23) Support principle – more detail regarding community engagement, capacity building, and empowering the community.
- 24) Will improve social stability.
- 25) Support for regeneration of Hill Ward, Daventry.
- 26) Details on how regeneration will take place and what is will be achieved should be included.
- 27) Principle agreed, but current proposals are not supported.
- 28) Regeneration of neighbourhoods must ensure centres are protected.
- 29) The western arc area for renewal will be supported by development options Northampton North and West.
- 30) Support for regeneration of Spencer Ward.
- 31) Overcoming inequalities will create friendly environments with sustainable opportunities.
- 32) Low cost housing needs of people in these areas must be considered so they included in regeneration process.

Question 42 continued

Object

- 1) Policy is offensive – poor areas need to be addressed specifically not equated with ‘taking from the rich’.
- 2) Some villages do not have the services to sustain further development.
- 3) Inequality is not the same as deprivation. Deprivation may arise from building at high densities.
- 4) Policy approach is merely a list of words that cannot form a cohesive policy.
- 5) Investment should be directed to improving facilities and infrastructure and improving Northampton centre.
- 6) Policy approach not supported - Paragraph 6.10.1.2 smacks of social engineering. Policy is doomed to failure unless behaviour patterns can be changed.
- 7) Brownfield land in Northampton Town can be regenerated and contribute to housing targets.
- 8) Policy approach is not clearly stated.
- 9) Lack of detail and cohesive policy implies the areas are not considered to be important in the overall scheme of the plan.
- 10) This policy is not required.
- 11) The listing of priority areas will result in the neglect of others.
- 12) External interference is not necessary.
- 13) Concern, that the scope of the Joint Core Strategy is too limited to achieve this aim. In order for this perceived inequality to be addressed, it will be important that public sector funds are directed at assisting existing communities as well as the private sector funds which will assist in facilitating and developing the new communities.
- 14) Past developments at Northampton have not produced any tangible benefits for Northampton town centre.
- 15) Planning appears to be responding to regional targets and solutions do not address the needs of local needs.
- 16) Brackley and Towcester are thriving; there is no requirement for regeneration at these towns.

Question 42 (Object) continued

- 17) Policy approach fails to recognise new regeneration instead focussing on the renewal of existing communities.
- 18) Must regenerate area between Castle Station and Kingsthorpe along the railway line. This does not provide an attractive advertisement for the town.

General Comments

- 1) Clarification of the term 'renewal' is required – renewal, redevelopment or clearance?
- 2) Development at Overstone Leys will assist the regeneration of deprived areas of Northampton North by providing employment opportunities and facilities and services.
- 3) The strategy only identifies areas and lacks detail on how regeneration is to be achieved. No action / implementation plan is proposed.
- 4) Housing in rural countryside will destroy the attractive villages and will not work to regenerate Northampton.
- 5) A mixture of town centre uses should be encouraged to it remains vibrant when shops close in the evening.
- 6) Will express strategic design vision of the towns.
- 7) Further explanation required on regarding how the communities affected will be engaged as part of the regeneration proposals.
- 8) It is necessary to preserve rural Northamptonshire's unique identity.
- 9) Not defined policy in the document, comment cannot be made.
- 10) Some deprived areas are a result of previous planning failures. The policy will have to address how physical alteration can improve the environment and neighbourhoods.
- 11) Distinction must be made between 'old areas' which have historically been less affluent and poor quality areas as a result of poor planning.
- 12) North eastern and western arc must be defined.
- 13) Northampton Town Centre Plan is in direct conflict with the *Emergent Joint Core Strategy*.
- 14) Historically, large developments have failed in Northampton.

Question 42 (General Comments) continued

- 15) The town and its centre must be regenerated to encourage people to visit.
 - 16) Rectory Farm and Cetin Brook require regeneration.
 - 17) Southern flow of employment, retail, and leisure will be increased by the building of the A45/M1 link. This road will not assist the regeneration of Northampton.
 - 18) Architectural regeneration of building in failing wards must be considered.
 - 19) Brownfield sites must be developed.
 - 20) Regeneration outside the priorities areas must be considered. Acknowledgement of temporal changes in priority areas over the plan period.
-

Question 43

Question – Do you support the policy approach for Designing in Quality into new and existing developments?

Summary of Key Points Raised in the Responses:

Support

- 1) Good design and quality is imperative to all communities.
- 2) Quality is paramount.
- 3) New development should be the same or better than that which surrounds the area.
- 4) Support, provided dwellings are a suitable size to allow a comfortable way of life.
- 5) This will prolong the life of buildings.
- 6) Essential for successful development.
- 7) This will be an improvement on recent housing development and should provide access for emergency services and buses.
- 8) This is self-evident.
- 9) Support, although concerned that no general design principles have been set out.
- 10) Agree that social, sustainability, visual and functional issues are all features of designing in quality.

Object

- 1) This policy approach is very subjective.
- 2) Who decides quality and standards? It can vary by area.
- 3) Affordable housing will lead to low quality housing stock.
- 4) This policy contains insufficient detail and is vague.
- 5) Judging by past experience, modern planners and cost-cutting developers do not know what this means.
- 6) Only public money will provide quality and this is not provided for in the plan.

Question 43 (Object) continued

- 7) Good design on paper often fails to translate into good design when built.
- 8) This policy approach does not go far enough in setting energy efficient standards and carbon neutral build quality.
- 9) Reducing car parking numbers per household is not good design.
- 10) Whilst the principle of good design is supported, policies and guides cannot control this. Only good designers can create good designs.

General Comments

- 1) The Joint Planning Unit needs to do research into building forms to inform future development.
- 2) It is very important to involve new techniques.
- 3) Do not create suburban rabbit warrens.
- 4) Consider the use of Northamptonshire stone wherever possible.
- 5) Does quality refer to layout, bricks or both?
- 6) What is quality and how will it be measured?
- 7) Design must consider local designs, needs, knowledge and experience.
- 8) Design quality needs to be judged by locals as well as professionals. The locals have to live with it.
- 9) Brackley Town Council should be consulted at all levels of design.
- 10) Bring back Parker Morris Standard.
- 11) The design approach should highlight the need for an understanding of the character of an area, including its historic and landscape/townscape character.
- 12) This policy needs to be cross-referenced to sustainable construction/climate change issues.
- 13) The Towcester Vale scheme accords with this policy approach.
- 14) Milton Keynes is a good example.
- 15) Each town should have a separate and unique identity.

Question 43 (General Comment) continued

- 16) Quality needs to include buildings of the highest environmental standard, including heat recovery systems, solar panels, water recovery systems and wind turbines. The relationship to public transport needs to be considered.
 - 17) The use of tools like mater plans and design codes are essential to ensuring high standards are achieved.
 - 18) Avoid high-density housing.
 - 19) Grid style street patterns with sensible tree plantings should be encouraged.
 - 20) Need to stress quality over quantity.
 - 21) No high rise flats and multi-floored terraces.
 - 22) Regional Spatial Strategy Policy 2 will need to be taken into account when drawing up design policies.
 - 23) There should be no coalescence of villages, so as to ensure rural character is maintained.
 - 24) Set minimum standards and avoid prescribed solutions.
 - 25) Concerned that Daventry has two sets of master plans/visions. This is wasteful.
 - 26) Secured by Design and the contribution that design can make to crime prevention needs to be addressed in this policy approach.
 - 27) High quality design can be encouraged through competitions, focus groups and local architects' societies.
 - 28) Local distinctiveness and enhancement of built character in new developments is essential to good design.
-

Question 44

Question – Do you support the policy approach in relation to Green Infrastructure?

Summary of Key Points Raised in the Responses:

Support

- 1) Policy approach supported.
- 2) Strong support for the policy approach. Green infrastructure should be an integral part of the creation of sustainable communities.
- 3) The Core Strategy should seek an overall net gain in green infrastructure. The encouragement of development proposals that improve the quality, quantity and accessibility to green space must be sought.
- 4) Measures to encourage biodiversity including green roofs, planting and landscaping of native species are required.
- 5) Historic features such as Borough Hill at Daventry and the Grand Union Canal can be important parts of the green infrastructure network. Green infrastructure needs to be an important part of new development as well as providing wider links.
- 6) The policy approach is supported, although greater clarity is needed in the wording. Formal and informal recreational areas should be integrated into the network with good sustainable links from major settlement areas.
- 7) The principle is supported, although implementation of green infrastructure policy is expected to fail.
- 8) This will encourage residents not to view their area as a 'concrete jungle'.
- 9) 'We must build upon *Northamptonshire's Environmental Character and Green Infrastructure Suite* and work that has already been undertaken within West and North Northamptonshire as this will enhance key cross-boundary linkages and improve green infrastructure'.
- 10) The retention of green spaces within extensive development is imperative for recreation, relaxation and to act as a 'buffer' around areas being developed.
- 11) Cross-boundary linkages with North Northamptonshire must be fully explored.

Question 44 (Support) continued:

- 12) *North Northamptonshire Joint Core Spatial Strategy* identifies the Nene Valley corridor as a sub-regional corridor and this should be reflected throughout the *West Northamptonshire Joint Core Strategy*.
- 13) General support for approach - green infrastructure studies focus on the potential urban extension areas and do not provide sufficient detail at the district level and in rural areas. The *Local Development Framework* must consider the whole of the planning area be informed by up-to-date information at an appropriate scale.
- 14) This policy approach is a key part of the University's plans for the green space. Green infrastructure remains a vital element in attracting students and staff to Northamptonshire.
- 15) A policy is needed which encourages more people to lead active lifestyles.
- 16) Support the protection of habitats and biodiversity.
- 17) If green infrastructure cannot be provided as part of a development, then off-site provision must be secured.
- 18) This policy approach is generally supported, but development opportunities exist to the north of Towcester that would utilise and enhance existing green infrastructure.
- 19) This policy approach is generally supported, but paragraph 6.10.3.8 should be clarified, because it implies that there is limited scope for improvement. The policy must incorporate to contribution to form informal and formal green spaces.
- 20) This approach is supported and should encourage developers to fit buildings in and around green infrastructure instead of green infrastructure fitting in around developments.
- 21) Support this policy approach, but it is noted that the disused railway is proposed for a rapid transit route, and its inclusion as part of the green network of footpaths and cycleways is therefore not appropriate.
- 22) Open space wedges in Northampton that extend from the centre to rural periphery must be retained.
- 23) Support this approach in principal, but the *Emergent Joint Core Strategy* lacks details of who will maintain these spaces.
- 24) The core strategy should acknowledge the problems of using existing rights of way. Blue ways and disused railways must be considered i.e. lack of maintenance, discontinuity, insects and aggressive livestock.

Question 44 (Support) continued:

- 25) Comments made at the Issues and Options stage have not been fully considered and developed within the *Emergent Joint Core Strategy*. The *Landscape Sensitivity and Green Infrastructure studies* have not been used to identify opportunities for enhancement.
- 26) *The Biodiversity Action Plan* targets can be achieved through proper planning of green infrastructure. However, the green infrastructure studies focus on potential urban extensions and do not provide detail at the district or Borough level. Key green infrastructure opportunities are currently being missed in rural areas.
- 27) Support for this approach will give rise to multifunctional spaces which are crucial in areas of high growth. Green infrastructure can also contribute to reducing flood risk, enable species migration and act as a carbon store.
- 28) The concept of ensuring that waterways are more attractive and accessible is supported.
- 29) Allotments should be an essential aspect of green infrastructure.
- 30) Must establish more parks and play areas which can be enjoyed by children and families.

Object

- 1) The countryside should be preserved from development, brownfield sites should be developed first.
- 2) Objection to the use of the term 'green infrastructure'. *The strategy should use commonly understood words such as 'landscape, countryside or environment'.*
- 3) This policy approach is not supported, the protection of villages and their rural hinterland will secure green infrastructure.
- 4) Growth options on greenfield sites, fundamentally contradict the policy approach.
- 5) The loss of rural areas will destroy the qualities that make Northampton an attractive place to visit.
- 6) People will not abandon cars for buses and bicycles, modal shift is unrealistic.
- 7) The existing network of bridleways and public rights of way within the growth locations will be lost.

Question 44 (Object) continued:

- 8) Developer contributions are unlikely to secure green infrastructure requirements. The policy states to 'expect' developer to contribute to green infrastructure. This will not be sufficient to secure funding as S106 funding is not always provided and even less so if it is merely expected.
- 9) Nature must not be squeezed into narrow corridors.
- 10) Central Government must adhere to the carbon output target; nowhere does the *Emergent Joint Core Strategy* explain how these targets will be met locally or nationally. Green infrastructure can contribute to meeting these targets.
- 11) Development of prime agricultural land with many and varied natural assets is resisted. No amount of mitigation will reverse damage done if greenfield development progresses. This land is required to enable the United Kingdom to become self sufficient in food production.
- 12) Too much money will be wasted.
- 13) The vision proposes a net loss of biodiversity. This is inconsistent with the Planning Policy Statement 9: *Biodiversity and Geological Conservation*. A precautionary principal must be adopted and the vision must aim higher to preserve biodiversity.
- 14) Joint core strategy must consider the implications of the *green infrastructure studies and Landscape Sensitivity studies* more fully to ensure that growth can be directed away from areas that are particularly sensitive. The Strategy does not indicate what measures are proposed to protect the landscape or biodiversity for areas of high or medium sensitivity.

General Comments

- 1) Green corridors are for the movement of wildlife, not people.
- 2) Within rural areas the farming community must be involved in the consultation process. The importance of farming and its contribution is absent from the Strategy.
- 3) Specific proposals must be discussed at local level.
- 4) The Core Strategy must reference the need to provide cycleways alongside all local routes, including to Milton Keynes.
- 5) In town green spaces are magnets for anti-social behaviour and drinking.

Question 44 (General Comments) continued:

- 6) No evidence of strategic creative thinking as to how the general concept of green infrastructure might be translated into principals that have guided the selection of development options. Danger that green infrastructure will be seen as another 'charge' on development and not a key feature in determining development form.
- 7) It is unreasonable to expect that new development should be required to fund the enhancement or restoration of existing green infrastructure that is enjoyed in major part by existing communities and developments.
- 8) Statement that *'development will not be permitted to compromise the integrity of the green infrastructure network'* is too vague. The green infrastructure network is capable of change. Given the limited evidence on which the green infrastructure structure is founded, this is an unrealistic and unreasonable approach.
- 9) Further green infrastructure requirements should not form part of pre-submission draft but should have been made available at this stage of the strategy evolution.
- 10) Due regard should be paid to the protection of open countryside e.g. Daventry District's Special Landscape Areas. The preservation of open countryside between villages and close to towns is vitally important.
- 11) The area where the M1 crosses the Nene Valley needs improvement.
- 12) The revitalisation of Town Centres, off the back of existing and new cultural and tourist facilities is very desirable and in particular the utilisation of the water front areas in Northampton.
- 13) Wootton is ideally located to contribute to creating green infrastructure.
- 14) Unclear how enhancement of green infrastructure will be achieved away from development areas. Some funding may be able to be provided through rural business although additional public access and rights of way improvements are not quantified in cost or impact on the landowner or developer.
- 15) Clarification is required on the relationship and impact of development on the conversation areas of Overstone and Moulton.
- 16) Existing settlements must be screened from new development by trees and shrubs and this must be implemented prior to development.
- 17) Contributions to green infrastructure must be related to specific impacts and requirements of the development and must be openly consulted upon through the Core Strategy.

Question 44 (Support) continued:

- 18) Natural uncultivated green infrastructure is advocated.
 - 19) Development of Towcester Vale takes full regard of the green infrastructure framework.
 - 20) No support for growth at Daventry North on farmland and woodland that supports a wide range of species.
 - 21) Insufficient detail to provide comment on this approach.
 - 22) Protection of natural resources is required.
 - 23) This must include improvements to Northampton's existing green spaces.
 - 24) Northampton South provides the opportunity to create a network of multifunctional green spaces complimentary to the reconfiguration of the golf course.
 - 25) Green infrastructure must not be confused with the network of streets and cycleways that provide connections within and between areas.
 - 26) Areas that are separated by extensive areas of open space (Nene Valley) or adjacent to incompatible uses will not provide sustainable urban extensions.
 - 27) The strategy for Northampton South East will destroy the existing green infrastructure.
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Question 45

Question – Do you support the policy approach in relation to Culture and Cultural Heritage?

Summary of Key Points Raised in the Responses:

Support

- 1) Immigration is here to stay so we need to make them feel at home.
- 2) Support inclusion of the canal network as an element of archaeological heritage and promotions of additional cultural and tourist facilities at canal side villages.
- 3) This policy improves on the diverse culture and heritage of the area.
- 4) Roman and Bronze Age settlements and other cultural sites will be lost forever. We need to protect out cultural heritage.
- 5) Northamptonshire is the county of ‘spires and squires’ – it needs exploring and sustaining.
- 6) Support provided culture is not over-managed to the point that it cannot emerge.
- 7) Culture and heritage are important characteristics that should be nurtured.
- 8) This policy approach will assist the wider regeneration of Towcester.
- 9) Preserve and re-utilise where appropriate old buildings. They give character and resonance with the past and the country’s future.
- 10) The culture of a community should not be lost in its drive for growth.
- 11) A sense of place improves community cohesion.
- 12) People need to know the history of their surroundings and have an opportunity to participate in cultural activities.
- 13) The promotion and development of additional cultural and tourist facilities close to popular destinations, such as Northampton waterfront, is supported.
- 14) This policy will boost the economy.
- 15) New cultural sites and the protection of existing ones will be needed given the influx of people proposed.

Question 45 (Support) continued

- 16) This policy will contribute to the regeneration of town centres.
- 17) Preservation of existing cultural characteristics is importance for the identity of the community as well as encouraging tourism and trade within rural and urban environments.
- 18) British culture and history are very important.

Object

- 1) No support or adequate facilities are provided for inter-faith, inter-cultural and inter-community initiatives.
- 2) There is no evidence that charitable organisations have been consulted on this policy approach.
- 3) This policy is unclear and its evidence base incomplete. It therefore needs more work.
- 4) The evening economy in Northampton is an abomination and should not be encouraged.
- 5) This policy approach only supports culture in certain places. It should be encouraged everywhere.
- 6) Personal safety issues arising from the evening economy need to also be addressed.
- 7) This policy does not specify sites to be protected.
- 8) Indigenous heritage is quite sufficient.
- 9) This policy approach will damage the County irreversibly.
- 10) Silverstone Circuit should not be included.
- 11) More work is needed on this policy heading.
- 12) The huge metropolis that this plan will create will not preserve the heritage and conservation areas or the individuality of towns.
- 13) This part of the strategy is too ethereal.
- 14) Present “cultural policies” have resulted in the deplorable, unsafe weekend evening binge drinking culture. This policy will only encourage this further.

Question 45 (Object) continued

- 15) This plan will destroy Northampton's archaeological heritage.
- 16) This policy doesn't cover personal safety issues as a result of the existing evening culture.
- 17) A clearer definition of what the policy actually means is required.
- 18) Culture and heritage are two distinct issues and should be addressed separately.
- 19) Supporting the evening economy will give rise to more alcohol related injury, thereby further straining the already stretched Accident and Emergency department at Northampton General Hospital.
- 20) Church buildings, church history and church communities need to be mentioned, as does the role of church buildings as tourist attractions.
- 21) Instead of promoting diverse culture, we should recognise the rights of the indigenous people of this country.
- 22) The assumption that a village hall or pub is the focus of rural culture is untested and incorrect.
- 23) This policy needs to also protect landscapes.
- 24) This policy approach is too restrictive, and will discourage regeneration of Brackley.

General Comments

- 1) This policy needs to also include provision for people to exercise their religious beliefs and/or meet as faith communities. Government guidance in 'Face to Face and Side by Side' and 'Cambridgeshire Horizons' are good practice guides.
- 2) A new Village Hall that will benefit Overstone Village is envisaged.
- 3) Real heritage is not celebrated enough.
- 4) Weedon Depot needs to be protected and recognition given to its national importance. To achieve this, viable uses must be encouraged on-site.
- 5) The Green Environment also needs to be protected in this policy approach.

Question 45 (General Comments) continued

- 6) The Northampton South East area is unusually rich in archaeological heritage and this must be protected.
- 7) More places for Christian worship are needed.
- 8) Given Northampton's historic importance for the shoe manufacturing industry, the creation of a high quality, handmade shoe manufacturing and marketing centre is needed.
- 9) As Boudica's last stand was in this locality, it would be an ideal subject for a museum exhibition.
- 10) We are still waiting for a museum at Cogenhoe.
- 11) Brackley wishes to have an exhibition gallery and performing arts centre.
- 12) A clear distinction needs to be made between the provision of cultural facilities and the strategy for managing the historic environment.
- 13) Key areas for action need to be set out in the Core Strategy.
- 14) Daventry needs to benefit from this policy approach. In particular, leisure outlets need to be put forward speedily and matching the needs of Daventry's dwellers.
- 15) The glossary should contain a definition of what "A4 (*Drinking Establishments*), A3 (*Restaurants and Cafes*), D2 (*Assembly and Leisure*) and D1 (*Non-residential Institutions*)" uses are.
- 16) There is a need to consolidate strength and build for the future, not protect fossilisation.
- 17) This policy should include an ambition to greatly improve tourist information services.
- 18) The Culture and Heritage policy should be moved to a position between 'Designing in Quality' (6.10.2) and 'Green Infrastructure' (6.10.3).
- 19) If Northampton is to become a city, make it distinctive and build upon the existing heritage.
- 20) The voluntary sector must be supported in the provision of cultural heritage.
- 21) Daventry Water Space should be added to the bullet point relating to Daventry Town Centre.

Question 45 (General Comments) continued

- 22) A dedicated department is needed to ensure archaeological sites are respected.
 - 23) This policy needs to apply to villages too, not just the towns.
 - 24) A hotel should be built at Silverstone.
 - 25) Implications of management, maintenance costs and means of funding need to be addressed (e.g. establish trust with asset base as Milton Keynes Parks Trust).
 - 26) More mention needs to be made of the provision and protection of cultural facilities in Daventry, particularly Daventry Town Museum.
 - 27) With regards to the evening economy, it should be specified that some uses would not be appropriate in certain locations.
 - 28) Theatre provision and public art needs to be addressed here.
 - 29) This section needs to refer to preferred proposals within other Development Plan Documents.
 - 30) This section could benefit from reference to a new archaeological archive.
 - 31) The West Northamptonshire Joint Planning Unit needs to ensure that this plan, and particularly this policy, is in accordance with the revised *Planning Policy Statement 15*.
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Question 46

Question – Do you support the policy approach in relation to Landscape and Biodiversity?

Summary of Key Points Raised in the Responses:

Support

- 1) This policy approach supported and should provide a source of comfort to residents.
- 2) Due regard should be paid to the protection of open countryside e.g. Daventry District's Special Landscape Areas.
- 3) The preservation of open countryside between villages and close to towns is vitally important.
- 4) The Nene valley should be protected (Nene recreation area, Upper Nene Gravel Pits potential Special Protection Area). The proposed expansion sites, in particular Northampton South East, impinge on these natural areas which raises questions over the tests that have determined that no satisfactory alternative options are available. This concern is echoed in the *Emergent Joint Core Strategy Sustainability Appraisal – Appendix B*. Any extension must be subject to Environmental Impact Assessment and Ecological Impact Assessment.
- 5) This policy approach supported, provided it does not impinge on valuable and productive farmland and decrease food production.
- 6) Townscape needs to be taken into account in the design and implementation of new development.
- 7) Woodlands, trees and green spaces are vital.
- 8) This approach supported, but it is questioned why this paragraph only refers to the creation and improvement of woodland and tree planting and not other habitats of significance such as acid grassland and heathland as identified in the *Biodiversity Action Plan*.
- 9) This approach is supported, but policy must be uniformly applied across West Northamptonshire. If so, Daventry North would be rejected.
- 10) Supported, but climate change needs addressing.
- 11) Local areas are being destroyed and require protection.
- 12) This must be intrinsic to any development.

Question 46 (Support) continued:

- 13) This approach is supported and enhancement measures should be proportionate to the level of development, in line with Planning Policy Statement 9: *Biodiversity and Geological Conservation*.
- 14) Supported, providing existing greenfield land is preserved.
- 15) Leisure and recreation should be included within the Core Strategy.
- 16) The policy approach must indicate an understanding of the landscape and townscape and this needs to be taken into account in the design and implementation of all new development.
- 17) This is essential to reduce the carbon footprint.
- 18) The principal policy approach supported, but more detail must be provided.
- 19) The policy must also take into account the contribution that gardens, allotments and open space make toward biodiversity. Garden provision should be included as part of the Plan.
- 20) This requires agreement on enforceable guarantees.
- 21) Support for development that incorporates biodiversity action plans into both development and design and operation.
- 22) The University would welcome active involvement in achieving this aim.
- 23) Natural England's *Access to Natural Green space Standard* and the Woodland Trust's *Woodland Access Standards* should form part of the strategy.
- 24) General support for this policy approach and the Wootton SDA (A consortium comprising; Barratt Strategic, Homes & Communities Agency, Harcourt Developments, Martin Grant Homes and Kier) will contribute toward these aims.
- 25) The Emergent Joint Core Strategy must acknowledge the importance of historical landscapes.

Object

- 1) This policy approach is not supported.
- 2) This policy will mean a loss of profit for developers and therefore will not be implemented.

Question 46 (Object) continued:

- 3) Development options will have a detrimental impact on wildlife, habitat and archaeology.
- 4) Wildlife must not be squeezed into corridors.
- 5) The link road to the M1 would contravene this policy.
- 6) The strategy has disregarded the results of the *Combined Landscape and Biodiversity Sensitivity* results as they apply to Great Houghton. This Option should be rejected.
- 7) Development of prime agricultural land with many and varied natural assets in Northampton South East cannot deliver “a significant net gain for biodiversity”.
- 8) Small areas of ‘green infrastructure’ cannot ‘mitigate’ or ‘compensate’ for the loss of landscape, habitat and the biodiversity.
- 9) Based on previous experience there is little confidence that this policy will be applied when planning applications are submitted.
- 10) The policy contradicts itself. To allow development ‘*where adverse impacts are unavoidable...appropriate mitigation and compensatory measures will be required*’ will not produce development that ‘*protects existing assets and delivers a significant net gain in biodiversity.*’
- 11) The proposals within the Emergent Joint Core Strategy, particularly the urban extensions, will not achieve this. Developing Greenfield sites cannot produce a net gain in biodiversity and comprehensive mitigation and relocation is not possible.
- 12) Nature will take care of itself.
- 13) Central government priorities will undermine this policy.
- 14) The principal is supported, but plans need to be more ambitious to reverse previous trends of poor performance. There is a lack of acknowledgement of landscape protection and the need to restore and tackle current neglect.
- 15) Biodiversity improvements must not result in places not being free to visit i.e. Salcey Forest.
- 16) Development at the southeast of Northampton would impact on a number of ancient hedgerows. Before development proceeds, it should be necessary for these features to be surveyed and investigated.

Question 46 (Object) continued:

- 17) The *Biodiversity Action Plan*, should be used as a source, but is not part of the development plan as it has not been subject to independent review and should therefore not be given any weight in determining standards of acceptability.
- 18) Topography has not been taken into account, the development of the South East Northampton and the A45 link would result in unacceptable levels of noise and light pollution for surrounding residents.

General Comments

- 1) Policy must outline how the environmental impact of development will be integrated.
- 2) The decision making process of West Northamptonshire Development Corporation gives little confidence that this policy approach will be followed.
- 3) Light and noise pollution will ruin the Nene Valley designated recreation area.
- 4) The plans do not reflect the local need.
- 5) Scepticism regarding the achievability of the high ideals within this policy approach.
- 6) Policy approach should be strengthened because it requires compensatory measures where biodiversity is lost. It does not recognise that some semi-natural habitats, such as ancient woodlands, are irreplaceable and once lost cannot be replaced.
- 7) If development is to continue a northern woodland planting scheme should be introduced which could help negate the noise of the M1/ A14/ railways and other new roads.
- 8) Whittlewood forest is an important area requiring protection.
- 9) The *Landscape Sensitivity and Green Infrastructure studies* have not been used to identify opportunities of enhancement.
- 10) *The Biodiversity Action Plan* targets can be achieved through proper planning of green infrastructure. However, the green infrastructure studies focus on potential urban extensions and do not provide detail at the district level. Key green infrastructure opportunities are currently being missed in rural areas.

Question 46 (General Comments) continued:

- 11) Concern that privatisation of the Forestry Commission will halt the Woodland Enhancement Programme.
 - 12) The whole of West Northamptonshire needs significant investment to achieve this aim.
 - 13) What are does Yardley Chase represent?
 - 14) Areas of open countryside between villages are important to their well-being and historic and cultural environment.
 - 15) Consider the Environmental Protection Act.
 - 16) Support the protection of Daventry Country Park.
 - 17) Salcey Forest must be preserved.
 - 18) Replace trees that are felled as a result of development and extend open space and forests.
-

Question 47

Question – Do you support the policy approach in relation to Climate Change?

Summary of Key Points Raised in the Responses:

Support

- 1) Climate change is a key issue that should be reflected more widely throughout the document. It should be a more prominent policy within the *West Northamptonshire Emergent Joint Core Strategy* and not just appearing as question 47.
- 2) Other low carbon energy generation options must be explored beyond the opportunities at large scale developments.
- 3) Significant opportunities are available for biomass in what will remain a generally rural area.
- 4) Some opportunities exist for wind development at a variety of scales.
- 5) Specific targets should be included for appropriate locations.
- 6) Support for reducing need to travel by locating homes close to places of work.
- 7) The policy should fully cover the adaptation of natural systems to climate change. The approach must encourage increasing the network of green corridors and linking isolate nature conservation sites in order to aid the dispersal of species to reduce species extinction as habitats become unsuitable.
- 8) Support for an approach that encourages energy provision derived from renewable resources and the principle of sustainable energy generation. The Core Strategy's approach to renewable energy should include measures to protect the natural environment and the amenity this affords.
- 9) Secured by Design principles can promote carbon savings by helping to achieve points for the *Code for Sustainable Homes* and by reducing the carbon cost of crime from the investigation and replaced items lost or stolen as part of crimes.
- 10) The respondent supports this approach, but requires clarification of the impacts of climate change on biodiversity within the list of principle impacts.

Question 47 (Support) continued:

- 11) The proposal is accepted but remains largely based upon the reduction on the use of cars. It is anticipated that emission levels may well reduce with technological advances. The private car will still need to be catered for as other forms of transport are currently not either viable nor 'user friendly'.
- 12) Evidence is required in relation to current climate change plans and the measures that will ensure these are continued through the Core Strategy.
- 13) The principal is supported but the achievability of the proposal is questioned.
- 14) Development must be focused in the town centre. This will respond to many of the impacts of climate change.
- 15) Supported although the strategy must be more ambitious in its proposals if we are to be the leader in urban development. Combined Heat and Power and Local District Heating Systems must be implemented at the start of any new development and be included in the proposals. More innovation would attract funding from Europe for research and implementation of green projects.
- 16) This approach is not precise. Performance of housing must be related to existing national standards such as that *Building Research Establishment's Environmental Assessment Method* and the *Code for Sustainable Homes*. Imposing standards above those that are nationally required would be resisted.
- 17) Refer to the *United Kingdoms Climate Impacts Programme* for forecasting.
- 18) Policies must not be too prescriptive to allow for creative ideas.
- 19) Support as this will reduce flooding.
- 20) Generally support this policy approach, although the standards of sustainable development that will be required must take account of viability.
- 21) Supported, although public transport services must improve and become cheaper, to encourage people out of their cars.
- 22) A balanced approach must be taken and must not restrict potential benefits that can be achieved.

Question 47 continued:

Object

- 1) The policy approach to climate change should be more demanding and ambitious for such a significant topic.
- 2) An unreasonable level of confidence is placed in Sustainable Drainage Systems. These will not mitigate the impact of climate change and should not be used in isolation to protect against flood risk.
- 3) Development at locations not within urban areas and away from employment provision runs counter to this policy approach.
- 4) Proposed growth will reduce agricultural yields through loss of farmland and will increase flooding, water shortages, traffic, congestion and air pollution.
- 5) There is no confidence in the delivery of these policies.
- 6) Northampton Sustainable Urban Extensions (South and Southeast) are to be built on a known floodplain. This will increase run off, and put pressure on inadequate drainage systems. The Plans do not account for this risk and must be re-evaluated.
- 7) Essential drainage cannot currently be maintained and there is an unreasonable level of optimism that climate change can be addressed through the plan.
- 8) The major new four-lane link road and relocation of Junction 15, M1 together with the Northampton South East area run counter to the suggested policy approach to reduce greenhouse gas emissions and air pollution in the area.
- 9) Failure to provide sufficient local employment, retail shops, and public transport can only lead to increased vehicular movements. This approach cannot be supported.
- 10) Reference must be made to sustainable waste management and local energy generation.
- 11) This policy is weak, proposals will not offset the environmental impacts of this growth and large-scale tree planting schemes will be required.
- 12) No significant measures are proposed to tackle climate change. More innovation is required in the design and implementation of new development now. Evidence of plans, standards and guiding principals needed to demonstrate commitment to this policy.

Question 47 (Object) continued:

- 13) Transport infrastructure will only benefit urban communities. The rural communities need significant investment in order to improve public transport provision in these areas. Funding to achieve this is not available.
- 14) Sustainable housing must be encouraged for example solar, local generation and small-scale hydro projects should be investigated.
- 15) Climate change is a natural phenomena, intervention is not required.
- 16) Electric car charging points must be incorporated into any design as this technology will be common place next ten years.
- 17) No attempt has been made within the document to offset carbon from the new developments.
- 18) The imbalance of jobs per household would force people to commute to work and this is contrary to the intentions of this policy approach.
- 19) The strategy does not account for the contribution that rail freight can make to reduce carbon dioxide emissions. The strategy must acknowledge other non-road means of distribution.

General Comments

- 1) There are many examples within the strategy where the development proposals are at odds with this policy proposal.
- 2) Developers cost calculation will not provide sufficient funding to secure the required infrastructure for new development.
- 3) Development must be connected directly to Daventry in order to reduce pollution.
- 4) The strategy must provide a clear stance on wind power generation.
- 5) This local approach will not matter unless the main culprits; United States of America, China and India reduce their impact.
- 6) Access to countryside requires greater emphasis and leisure opportunities must not be overlooked.
- 7) Consider the guidance produced by English Heritage on climate change.
- 8) There is no mention of low carbon energy generating options outside of the Sustainable Urban Extensions.

Question 47 (General Comments) continued:

- 9) Cement production is one of the largest Carbon Dioxide sources.
- 10) Emphasis should be placed on developing the central area and providing the necessary infrastructure.
- 11) Road haulage as a result of the high concentration of distribution/logistics employment produces high levels of carbon dioxide. We must drastically reduce consumption and reduce reliance on this sector.
- 12) We must ensure these policies are not dropped for economic reasons.

Question 48

Question – Do you support the policy approach in relation to Flood Risk?

Summary of Key Points Raised in the Responses:

Support

- 1) This approach is supported, provided the wetlands are included as flood mitigation, as they also provide wildlife habitat.
- 2) Smaller controlled development would mitigate this flood risk.
- 3) Support this approach as it is in accordance with Planning Policy Statement 25: *Development and Flood Risk*.
- 4) Use of Flood Risk Assessments and the incorporation of Sustainable Urban Drainage Systems are supported.
- 5) A significant amount of brownfield land in Northampton is located on flood plains; as such a robust strategy for dealing with flood risk is needed, to ensure housing targets are met.
- 6) This approach supports the objection to development at Northampton South.
- 7) Provided the relevant research and engineering measures are utilised, the approach is supported.

Object

- 1) The evidence base supporting this policy approach, particularly the *Strategic Flood Risk Assessment*, is incomplete.
- 2) How can the Sustainable Urban Extension locations be decided with any accuracy given the absence of a complete *Strategic Flood Risk Assessment*?
- 3) Drainage for so many houses creates new problems, in addition to old ones.
- 4) Massive housing projects would prevent the water run-off capacity of surrounding land and pose a serious threat to the whole of Northampton Town.
- 5) West Northamptonshire has a complicated network of waterways and it is frightening to think what the effect of thousands of tons of bricks and concrete may have on this.

Question 48 (Object) continued:

- 6) Northampton and its surrounding area have been flooded on numerous occasions in the past due to construction in flood plains (e.g. Easter 1998). The lessons learnt from this appear not to have been learnt.
- 7) Flood predictions on Environment Agency maps are already being ignored.
- 8) Who will pay for the massive flood prevention infrastructure necessary to mitigate flood risk caused by this additional development? No costing for this infrastructure has been provided.
- 9) Paragraph 6.7.2.3 is both misleading and confusing. Misleading because the Environment Agency have supported development in Daventry subject to conditions. The section is confusing because the *Water Cycle Strategy* and *Strategic Flood Risk Assessment* have not been completed.
- 10) I do not trust the authorities to tackle the flood problem given their previous track record. For example, the new developments at Collingtree and Upton flood at present.
- 11) Development will exacerbate up or downstream flooding. In particular, the proposed South East Northampton Sustainable Urban Extension will exacerbate flood risk for St James and Far Cotton.
- 12) Sustainable urban Drainage Systems (SuDs) cannot adequately mitigate flood risk. In particular, they become overwhelmed after two days of rain.
- 13) The suggestion that developers should decide flood plain level is unacceptable.
- 14) This approach is insufficiently pro-active in terms of taking measures to work with the water environment and thereby reduce flood risk.
- 15) The data on which the *Strategic Flood Risk Assessment* is based has been shown to be flawed.
- 16) The Environment Agency are using peak flow calculations that are less than those used in 1947, despite flows having increased. This therefore makes their use as a basis for flood risk assessment flawed.
- 17) Developer contributions cannot fund the massive flood mitigation measures needed for the level of development proposed.
- 18) Development should only be allowed in areas with no flood risk.
- 19) This approach is weighted toward development.

Question 48 (Object) continued:

- 20) No mention is made of the Environment Agency's opposition to temporary sewerage treatment plants or that Whilton Sewerage Treatment Works can only accommodate waste from a further 800 houses.
- 21) Planning Policy Statement 25: *Development and Flood Risk* is currently under review. Need to ensure that the proposal is in accordance with the current or revised version.
- 22) The effect of flooding on road improvements to the A43 Moulton Bypass, A43 and Moulton to Kettering Bypass has not been covered in the *Level 1 Strategic Flood Risk Assessment*, despite these areas containing Type 3 Flood Risk Areas.
- 23) *Flood Risk Assessments* do not match reality. For example, Wootton Brook has flooded three times in the last five years, despite being designated a 1 in 100 year flood risk.

General Comments

- 1) One organisation or party needs to be responsible for monitoring and river flow management, this will ensure accountability.
- 2) The Environment Agency need to be consulted.
- 3) Provide bigger rainwater gutters on houses, steeper gutters on new roads and maintain all watercourses.
- 4) Flood risk is linked to the adequacy of water supplies. New infrastructure may be needed, including reservoirs. This would allow this flood water to augment drinking water supplies.
- 5) Any requirements for new flood mitigation infrastructure deemed necessary as a result of growth should be consulted on throughout the Local Development Framework.
- 6) It may be necessary to give financial support to British Waterways for canal embankment maintenance as gradually reduced funding is causing potential danger.
- 7) Flood risk is getting worse due to global warming. Has this been factored in?
- 8) Will Wootton Brook's defences be upgraded to handle 1 in 200 year flood risk event?

Question 48 (General Comments) continued:

- 9) Minor flooding away from rivers needs to also be considered.
 - 10) Development in Daventry will cause problems in other parts of the valley, which are not protected by flood barriers.
 - 11) Separate storm and waste water systems are needed.
 - 12) Has the flood risk outside the county from development in this county been considered?
 - 13) The strategy needs to also address future maintenance and administration of mitigation infrastructure to prevent future flooding.
 - 14) This policy approach should be closely allied to that on Landscape and Biodiversity.
 - 15) Dallington Grange is not at risk of flooding and is sufficiently large enough to accommodate Sustainable urban Drainage Systems (SuDs).
 - 16) The plan could benefit from a policy that specifically reflects the need to make space for water, as a result of increased flood risk from Climate Change.
 - 17) A Surface Water Management Plan (SWMP) should also be commissioned as part of the evidence base for the Core Strategy.
 - 18) A totally independent study needs to be undertaken in relation to building in the Nene flood plain.
 - 19) The number of houses should be reduced to allow the countryside to absorb water.
 - 20) Not enough information has been provided to give a meaningful response.
-

Question 49

Question – Do you support the policy approach in relation to Health and Wellbeing and Leisure, Sport and Recreation?

Summary of Key Points Raised in the Responses:

Support

- 1) Obesity is at dangerous levels in society so the provision of leisure facilities is extremely important.
- 2) This policy contributes positively to physical and mental health.
- 3) Major improvements are needed in Northampton.
- 4) These matters are as important as culture and heritage.
- 5) Support provided facilities are provided to all at reasonable cost and reasonable times.
- 6) Provision of such facilities increases a sense of community safety and therefore helps counteract degeneration in an area.

Object

- 1) Although the importance of social infrastructure is recognised in the policy, previous experience suggests that it will not be provided.
- 2) No mention is made of Hospitals, Police or fire services, even though these are basic requirements for health and well being. These need to be provided before leisure facilities.
- 3) Existing facilities are already overstretched and have declined over the last 30 years.
- 4) This section needs to be strengthened to consider how growth can be shaped to promote healthier lifestyles, tackle obesity, mental health conditions and give access to expanded leisure facilities, along with access to the countryside for walking, cycling and equestrian activities.
- 5) No proper consideration of health provision has been undertaken.
- 6) This lacks sufficient detail.

Question 49 (Object) continued

- 7) The medical infrastructure for such high levels of development is neither available nor feasible. Northamptonshire is not an attractive destination for prospective doctors whilst existing practices cannot accommodate them.
- 8) The financial pressures on the National Health Service are not favourable to an expansion of provision.
- 9) Building a new road to the M1 will result in additional pollution that will not improve the health and well-being of residents within West Northamptonshire.
- 10) Large urban areas encourage anti-social behaviour and do not encourage people to feel safe.
- 11) Developer led development will not take account of local needs and circumstances.
- 12) External interference is not required.
- 13) Too much emphasis is placed on sport facilities.
- 14) Build a new town with its own facilities.
- 15) This approach is confused and meaningless.
- 16) This policy approach is unclear. In particular, there are major differences between the standards sought in Northampton, Daventry and South Northamptonshire.
- 17) Detailed standards should not be included in the Core Strategy, but rather in a subsequent allocations document.

General Comments

- 1) More mention needs to be made of non-sporting clubs (e.g. church clubs, Scouts) as these have far more “health giving/preserving” attributes than sports.
- 2) Parks and Open Spaces are important but have little protection from development at present.

Question 49 (General Comments) continued

- 3) This needs to be done for existing communities, let alone new ones.
- 4) Smaller centres near existing communities need to be provided.
- 5) Why do Northamptonshire County Council wish to sell off disused playing fields when they could be used for recreation?
- 6) The majority of public leisure facilities are not accessible by public transport.
- 7) Local newsagents, post offices, public houses and local farm produce shops should also be included.
- 8) The network of rural pathways throughout West Northamptonshire are well used and already contribute to community well-being and health.
- 9) In accordance with Planning Policy Guidance Note 17: *Open Space, Sport and Recreation*, the quality of facility as well as the quantity of them must also be considered when determining recreation facility provision.
- 10) This policy should be linked to the green infrastructure policy to ensure multi-functional use and benefit.
- 11) In accordance with *Circular 05/05 (Planning Obligations)*, developers should only be expected to provide facilities necessary to mitigate the effects of their development. Where existing shortfalls are identified, these should not be funded by new development.
- 12) Leisure and recreation centres should be ring-fenced from development.
- 13) More facilities need to be provided in Daventry.
- 14) Central government funding will be needed given the large existing deficit of health and leisure facilities.
- 15) This policy must include the whole population (i.e. young and old and those with long term diseases).
- 16) It should be made clearer that relocation of facilities is perfectly acceptable if an improvement in quality or quantity results.

Question 49 (General Comments) continued

- 17) There should be an explicit statement about the importance of design in securing health, particularly through active travel.
- 18) Something should be done early to gain public confidence.
- 19) Danes Camp Leisure Centre at Mereway District Centre can and should be upgraded to accommodate the leisure pursuits of local residents.
- 20) New and upgraded facilities should only be used by local taxpayers, and not those from further afield.
- 21) Development of the Bell Plantation Site would provide quality football facilities for the town and Towcester Town Football Club.
- 22) Development at Northampton South would reconfigure, retain and enhance Collingtree Park Golf Course and provide sporting and recreational facilities.
- 23) The Woodland Trusts "*Access to Woodland*" Standard should be mentioned here.
- 24) Sport and leisure facilities need to be underpinned by a pool of trained personnel and a strong network of clubs and associations to promote and run sport and leisure activities.
- 25) Specific mention should be made of Natural England's "*Accessible Green Space Standards*".
- 26) The Primary Care Trust estimates that the cost for additional healthcare infrastructure for the proposed development is £110.5 million.
- 27) This should also include access to wild and rural areas.

Question 50

Question – Do you support the policy approach in relation to the phasing of growth across West Northamptonshire?

Summary of Key Points Raised in the Responses:

Support

- 1) This policy approach and vision is supported as development must be appropriately phased.
- 2) The town needs revitalising and the roads require massive investment otherwise the town will grind to a halt.
- 3) The phasing of growth is an interesting subject and over this time-period many other things may be happening, such as a new high-speed railway; new nuclear power plants; wind farms; climate change; financial uncertainty the policy can only be what is hoped will happen.
- 4) Improved access to the Northampton/ Market Harborough hinterland and the upgrading of the M1/A14 Junction should be added to allow sustainable development of heritage assets in Northwest Northamptonshire- for example Naseby battlefield.
- 5) Policy approach supported, development must be appropriately phased.
- 6) Regeneration, redevelopment and strengthening of connections with other large urban areas and commuter route will increase opportunities and raise the profile of Northamptonshire as a whole.
- 7) Development at Towcester form part of the latter stages of the phasing. To ensure the continuity of housing supply small scale sites must be allowed to come forward.
- 8) It is essential that services are in place to ensure secondary health care is equitable with the national average. At present Daventry and South Northamptonshire fall below this standard.
- 9) Supported providing development is sensitive to people's needs and their surroundings.
- 10) This policy approach will help minimise waste and mistakes.

Object

- 1) Level of infrastructure dependency is a concern. With work still ongoing the infrastructure timing is indicative and thus highly subjective.

Question 50 (Object) continued

- 2) The Emergent Joint Core Strategy is fundamentally flawed and more evidence base is required before the phasing can be agreed and supported.
- 3) Flood risk has not been assessed in relation to phasing.
- 4) Extending the Plan beyond the 2026 is not supported. This should be kept in line with the timeframe of the Regional Plan. The Plans for years 2011-16 appear in the Emergent Joint Core Strategy as being housing led. The infrastructure is unlikely to be provided; Flore-Weedon bypass has been an issue for many years and is unlikely to be delivered.
- 5) No support for A45 link road.
- 6) Incremental development would be a more realistic approach to development in the current economic conditions. This would create a flexible system in line with the requirements of PPS12: *Local Spatial Planning*.
- 7) Phasing should provide indicative dates and dependencies and key triggers.
- 8) The phasing section must be more explicit with regards to achieving an integrated approach to sustainable development and communities. No reference to phasing of green infrastructure or enhancing biodiversity.
- 9) The building timescales are too optimistic; who is going to buy all the homes?
- 10) Delivery rates at Towcester South are too slow. The bypass will not be viable when the proposed build-out rates are applied. Similar to Towcester Vale building rates must be rolled forward.
- 11) The over reliance on public transport in this section is a concern. Northampton will lose trade to Leicester and Milton Keynes where driving and car parking is easy. Northampton will need to become more accessible to compete with these destinations.
- 12) What is "exemplar"?
- 13) Utilise all brown field sites first. These haven't been considered as they would reduce developers' profits.
- 14) First class farming land would be built over first, before brownfield.
- 15) The infrastructure is vague and presumptive.

Question 50 (Object) continued

- 16) The long period of development condemns some areas and residents with 16 years or more of disruption and overstretched facilities whilst infrastructure catches up.
- 17) Existing transport routes should be improved rather than building new ones.
- 18) Economic condition suggest phasing is too optimistic – should be rolled back to at least 2016.
- 19) Regeneration of failing/deprived areas should be prioritised ahead of developing other areas. Many small developments could enhance run down areas.
- 20) The sites in the East of Northampton have become ghetto areas and need massive regeneration to improve the lives of people who already live there. Any money available should first be used to help these areas and many other parts of Northampton that need regeneration.
- 21) Infrastructure must come first.
- 22) A compact urban form is not necessary.
- 23) The Northampton Arc is not required.
- 24) Improvements to the existing A45 link to the M1 must be made.
- 25) We need to preserve our greenbelt and take a look at where the buildings in and near our town centre could be better used.
- 26) Funding for infrastructure must be secured before development timescales are decided. Funding mechanisms for infrastructure are not provided.
- 27) The A509, a key transport route, is absent from the Plan.
- 28) Commercial uses and job provision is not included as part of the phasing and needs to be.
- 29) Outcome of A45 Flore-Weedon bypass stakeholders meeting, 7th August 2009, estimated the delivery of bypass within 7 years, including consultation periods. More likely delivery would be within 12-15 years, suggesting the delivery estimates of the housing at Daventry would be very optimistic.
- 30) This phasing would be clearer if provided as a trajectory or timeline.

Question 50 (Object) continued

- 31) A contingency / action plan should be provided in case any of the growth option cannot be delivered.
- 32) Statement suggesting growth will be limited if A45/M1 link is not delivered is negatively worded. This may constrain the grant of planning permission and render the Plan unsound.
- 33) Objective to create a compact urban form does not accord with the preferred options.
- 34) Is the proposal to provide an 'innovative express public transport route' deliverable and reliable?
- 35) No justification for the A45/M1 link.
- 36) There is a concern that too many developments will commence at the same time placing unacceptable strain on the existing infrastructure. Sites should be prioritised to reduce pressure on infrastructure and reduce risk of vulnerability of incompleteness during future recessions.
- 37) It is not possible for water and waste water treatment providers to ascertain the impact or infrastructure requirement until the Core Strategy has provided firm proposals (location, timing volumes) for growth. There is currently insufficient headroom to accommodate growth at the Billing Waste Water Treatment Works. Upgrades to current infrastructure may result in the delay of the phasing proposed. The completion of the *Water Cycle Study* will assist in these uncertainties.
- 38) There is no mention of Junction 16, M1 option in this phasing section. This option is capable of delivery in the short term and is already provided for by existing infrastructure.
- 39) The credentials of individual sites must be scrutinised more closely before phasing is finalised with the Pre-Submission Draft.

General Comments

- 1) Daventry East is capable of delivery in the short term.
- 2) Dallington Grange must be treated as a commitment.
- 3) Development of Arm Farm could be brought forward without major infrastructure investment or reliance upon public funding.
- 4) Avon / Nunn Mills sites should be incorporated into the first phase of plan. The scale of these developments will continue into the second phasing period.

Question 50 (General Comments) continued

- 5) Daventry growth options will be infrastructure led and are reliant on the construction of the bypass. Contributions will be provided by Department For Transport (DFT) although further funds must be sought from development at other housing sites.
- 6) Conflicting figures regarding Northampton South – Question 31 reports 2200 units whereas phasing section only identifies 1200 units (2016-21 = 1000 and 2021-2026 = 200).
- 7) Significant employment growth at Silverstone must be referenced within the document and should be phased within the first 5 years.
- 8) Phasing for Northampton South East is unrealistic indicating that more growth should be directed to Northampton North.
- 9) Development should be increased in Towcester South to ensure adequate critical mass to secure the necessary infrastructure. It will be important that the A5 relief road is implemented as early as possible.
- 10) There appears to be no flexibility in the numbers for the extensions. This may produce a ceiling on the capacity and arbitrarily constrain development.
- 11) There is no reference of improved tourism opportunities, access rural areas and heritage assets.
- 12) Unconvinced the County Council will put forward a rigorous transport to support the Core Strategy.
- 13) Infrastructure and employment must be secured ahead of housing development.
- 14) Development should be slow and dictated by natural demand.
- 15) Growth should be located along major transport routes, on brownfield sites and close to employment provision to reduce the need to travel.
- 16) Services such as hospitals, doctor's surgeries, schools and local transport will be overloaded.
- 17) There is little safeguarding to prevent the repetition of past mistakes.
- 18) The Plan is based on presumptions and a number of the development areas could potentially change.
- 19) Empty houses must be improved and sold before new development is brought forward.

Question 50 (General Comments) continued

- 20) Whilst it is agreed that there are capacity constraints on the A5/A45 that will have to be overcome, and that financial contributions from developers will be required, there remains scope to implement parts of the planned growth of Daventry in advance.
- 21) The planned growth in Daventry brings forward the date that the A45 bypass is required, but it would still be required regardless. The phasing in the strategy is therefore at odds with what was discussed at the recent public enquiry.
- 22) Existing problems must be rectified before growth is permitted.
- 23) Historical failures in providing infrastructure provides no confidence the new communities will be adequately catered for.
- 24) Replacement of the bus service must be in a convenient location or it will not encourage the use of buses, particularly amongst the elderly.
- 25) Reorder last sentence: *'behavioural change to remove unnecessary trips, allowing modest growth in the very early phases'*.
- 26) It is unclear why development to the north would be a key gateway.
- 27) The Park and Ride to the North should operate to serve both Northampton and Kettering and Wellingborough.
- 28) It is acknowledged that some development may occur prior to the construction of the Flore-Weedon bypass; however, the Core Strategy must explore the locations that would most benefit from this road. Consideration should be given to providing these units within the urban area and brownfield sites within Daventry.
- 29) The Core Strategy must acknowledge the scale of challenge required to upgrade Daventry town centre.
- 30) Employment and housing delivery must proceed at least at a ratio of 1.05 per dwelling.
- 31) Core Strategy must make clear that the Flore-Weedon bypass will be funded entirely by developers.
- 32) Paragraph 6.11.6 and 6.11.7 must refer to Northampton by name.
- 33) Comment regarding routes passing 'through' Daventry Country Park need clarification.
- 34) Early stage intervention within 2011-16 timeframe at Weedon Depot should be included.

Question 50 (General Comments) continued

- 35) Redevelopment of the Grosvenor Centre is unlikely to be completed before 2016 and the emerging Central Area Action Plan targets completion by 2021. It should be acknowledged that other town centre development should be delivered to reduce leakage to Milton Keynes.
- 36) There needs to be a contingency in the event the Grosvenor redevelopment is not forthcoming will allow flexibility in the Plan in line with PPS12: *Planning Policy Statement 12: Local Spatial Planning*.
- 37) The Joint Planning Unit must not hold back any development which may come forward in the short term and that conforms to the tests of PPS6: *Planning for Town Centres*. The general approach taken in retail study informing the Emergent Joint Core Strategy is criticised.
- 38) The phasing that is described is dependant on the availability of site and the building of essential infrastructure.
- 39) There is insufficient detail regarding the University Arc.
- 40) The Towcester bypass must be a dual carriageway and linked to the A43.
- 41) Redevelopment of the town centre must not be seen as a prerequisite required before other development can be delivered.
- 42) The release of Wotton southern development area would be deliverable in the short term and would represent a sustainable development option requiring minimal major infrastructure.

Question 51

Question – Do you support the policy approach in relation to Funding and Delivery?

Summary of Key Points Raised in the Responses:

Support

- 1) Further development of the infrastructure evidence base is required.
- 2) An Affordable Housing and Developer Contributions Development Plan Documents (DPDs) must be in place.
- 3) This approach is supported, providing developer input is well managed and maintained.
- 4) The Core Strategy must not presuppose the infrastructure prioritisation process, which should be agreed by all partners.
- 5) A tariff based approach, whether through the Community Infrastructure Levy (CIL) or other means is considered appropriate.
- 6) Funding by developers is likely to be met with resistance.
- 7) The recognition that developers cannot be used to resolve existing deficiencies is supported.
- 8) Support for the approach that current/existing infrastructure deficiencies must be identified and regional and national funding must be secured.
- 9) This approach is supported; however there is a historic lack of investment to provide funding for infrastructure projects in the area.
- 10) To ensure the plan's success the growth of Northamptonshire should be infrastructure and plan led and not directed by developers.
- 11) The Developer Contributions Development Plan Document is required to be in place to ensure agreement is reached between public and private funding bodies to secure infrastructure. This must be subject to thorough testing through Development Plan Document (DPD) process and not as an Supplementary Planning Document (SPD).
- 12) A pragmatic approach must be taken (that is not hindered by the inadequacies of the Regional Plan regarding infrastructure provision) that will allow development to proceed, if necessary in advance of completion of required infrastructure, albeit with appropriate safeguards in place.

Question 51 (Support) continued

- 13) The Plan should be redrafted to focus upon delivery of the Regional Plan growth agenda.
- 14) The Plan must recognise that there is a requirement for public funds to be made available alongside developer contributions - reliance entirely on private funds will not deliver the infrastructure need.
- 15) A delivery framework must be agreed by all relevant bodies, including developers, to ensure delivery of infrastructure is attainable.
- 16) No reference within the Emergent Joint Core Strategy (EJCS) to West Northamptonshire Development Corporation (WNDC) that was set up as the delivery body for the planning area and has funds available to deliver growth. Furthermore, no mention of the Local Authorities that will also be key to the delivery of infrastructure.
- 17) Developer contributions must be made available to improve access to and from all parts of West Northamptonshire not just the suburbs.
- 18) Transport requirements should be linked to those identified in the Milton Keynes South Midlands Sub Regional Strategy (MKSM SRS), sub regional section and figures 1 and 2 of the Regional Spatial Strategy (RSS). Plan should also cross reference transport requirements against priorities in Regional Transport Plan.
- 19) The list of infrastructure at Brackley East does not accord with the policy tests of *Circular 05/05 (Planning Obligations)*. It is not fair, reasonable, related to development and proportionate.
- 20) Partnership working with Anglian Water to secure wastewater treatment and water provision is supported. Large-scale improvements associated with the growth detailed in the Core Strategy should be aligned with the *Asset Management Plan* for water providers and input into any review of the Regional Plan.
- 21) The Emergent Joint Core Strategy does not explain how water demand will be met when resources are currently already stretched. Water and sewerage undertakers have limited powers under the *Water Industry Act* to prevent connection to existing networks by developers, ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development whether through phasing or the use of planning conditions.
- 22) In line with *Circular 05/05* it must be acknowledged that developer contributions must be appropriate to the scale of development, related to the site, be reasonable and necessary to make the development acceptable in planning terms.

Question 51 (Support) continued

- 23) The reference to *Circular 05/2005* is incorrect and should be amended. Funds may be allowed to improve deficiencies in infrastructure if this is essential to allow the development to take place.
- 24) The policy approach should consider what planning obligations should be sought as prescribed, for mitigation and as compensatory measures. No indication of whether developers will be required to improve existing infrastructure to ensure a development is acceptable.

Object

- 1) Plans do not detail the location and type infrastructure required.
- 2) No provision for health facilities, medical centres and expanded or new hospital.
- 3) Flood protection infrastructure is absent.
- 4) There is a lack of education provision within proposals.
- 5) There is no indication of how essential infrastructure will be funded.
- 6) Policing and emergency services will be unable to cope to with this level of growth.
- 7) West Northamptonshire Development Corporation has no control over the delivery of highways, hospitals, emergency services and utilities.
- 8) Unconvinced infrastructure will be delivered.
- 9) The services and facilities provision to support this high level of growth is still unknown and the Plan has been formulated in the absence of this information.
- 10) The policy approach is vague and uncertain.
- 11) The robustness of the funding delivery plan is unconvincing and will not prevent approval of applications where inadequate infrastructure is proposed.
- 12) Developer funding is insufficient to secure required infrastructure.
- 13) The failure of West Northamptonshire Development Corporation to deliver infrastructure and past over reliance on developer contributions provides no confidence the Core Strategy will be a success.
- 14) Document needs to be much stronger in its approach to infrastructure.

Question 51 (Object) continued

- 15) If government funding is not available for the growth proposals the Core Strategy is unsustainable and untenable.
- 16) Joint Strategic Planning Committee, 6th July; “the prospect of Government funding is at risk over the plan period and the Joint Core Strategy needs to provide its own mechanism to deliver infrastructure”. There is a clear lack of clarity and conviction regarding the funding of essential infrastructure.
- 17) No coherent feasible policy approach is set out in the document.
- 18) Further detail of policy is required in order to provide an adequate response.
- 19) Infrastructure is vital, although none appears to be mentioned in the document.
- 20) There must be clear synergies between the West Northamptonshire Development Corporation’s Infrastructure Delivery Plan and the Joint Core Strategy.
- 21) No evidence of how the strategy will ensure infrastructure will precede housing development.
- 22) Infrastructure (particularly Northampton General Hospital) is currently under great stress. This level of growth will not be sustained and will require massive investment that is not likely to be met by the provision laid out in the Plan.
- 23) Must not burden too much of the infrastructure cost upon developers as this will result burden will be passed to buyers as house prices are inflated.
- 24) The country has just been thorough a recession. There are no funds available for these schemes.
- 25) Paragraph 7.0.1 – infrastructure is required to support communities and not ‘support development’ as the text suggests.
- 26) If central Government is to impose large growth on West Northampton it should also provide the funding to provide the necessary infrastructure to support the growth.
- 27) Infrastructure requirements are insufficiently developed across every strand element of the 6 principals of the Milton Keynes South Midlands Sub Regional Strategy (MKSM SRS) Quality of Life’s Sub Group.

Question 51 (Support) continued

- 28) This level of detail is even insufficient for an Issues and Option document. The Plan would be found unsound against the requirements of *Planning Policy Statement 12: Local Spatial Planning (PPS12)*.
- 29) No overall assessment/audit of current and proposed infrastructure.
- 30) The growth agenda must not be stifled by placing unreasonable cost upon developers. This approach this will result in areas becoming unviable and therefore undeliverable rendering the Plan unsound.

General Comments

- 1) There was no consultation with the General Hospital in terms of its capacity to accommodate this level of growth.
- 2) Existing infrastructure must be brought up to standard alongside any new development.
- 3) The new A45 road link is environmentally damaging, will increase traffic and commuting away from Northampton, cannot be funded through developer contributions and is a waste of money that could be better directed elsewhere. Improvement of A509 is advocated as alternative.
- 4) Consultation length, with regard to the pre submission document, must be realistic and sufficient to allow utilities companies to arrive at a well informed decision regarding capacity and evaluation of growth options. Modelling requirements and consultation with other regulatory bodies may require timescales beyond that of the minimum statutory consultation period.
- 5) More should be done to get developers to contribute to existing amenities.
- 6) Extent of engagement or future planned consultation with infrastructure providers should be highlighted in the document.
- 7) Many infrastructure requirements, as per the growth options, are commonly provided at a number of sites. It would be useful for the Core Strategy to make a distinction of where the provision is required on a site-by-site basis.
- 8) Plan must detail the public and private funds that will be available at the commencement of the development.
- 9) The Plan must highlight the trigger points where developer funds will be released and should identify how increased contributions from land value uplift will be secured when market conditions improve.

Question 51 (General Comments) continued

- 10) Development should make use of existing infrastructure and should not take the form of new compact developments.
- 11) Further consultation is required with the Town Councils.
- 12) Support for 'roof tax' initiative with Section 106 agreements tax payable by developers.
- 13) National Health Service (NHS) funding should be allocated in accordance with an agreed model such as the Healthy Urban Development Unit (HUDU) model, as proposed within the NHS guide for local planning authorities. NHS Medical provision must be in place ready to meet the needs of the population as it grows. This is particularly important as new NHS funding arrangement mean there is no longer central funding and this must now be found locally.
- 14) Infrastructure funding relies heavily on West Northamptonshire as a priority for government and agency support – it is doubtful this approach will continue through the medium and long term.
- 15) A detailed implementation plan must accompany the submitted strategy, showing how and when major development will be implemented and identifying the main deliver bodies and how their role in securing infrastructure. Failure to do so may result in the strategy being found unsound.
- 16) Allowing flexibility is vital to ensuring that the approach meets the test of soundness in terms of deliverability of new development as well as the maximum viable contribution towards infrastructure costs.
- 17) Funds must be allocated and ring-fenced for the funding of infrastructure and that these capital projects should be actioned before the new houses are built and not afterwards.
- 18) The Regional Plan is lacking in the identification of the transport needs of the growth area. The Joint Core Strategy must highlight this deficit and lobby for national funding.
- 19) The Growth for Northamptonshire is based on the premise of it being "infrastructure led". This is key to guarantee and ensure the Plan's success.
- 20) Government funding needs to be approved before planning permission is granted.

Question 51 (General Comments) continued

- 21) Each location of growth requires an assessment of the landowners, developers, financial institutions and a business plan to ensure the area is developable and should include detail on how the development should be phased and the funding mechanisms that must be identified.
- 22) The numbers and type of infrastructure provision has already been provided for Towcester and Brackley through other work/ studies and this information should be incorporated within the Core Strategy.
- 23) The Pre-submission draft of the Core Strategy should specifically require ecological enhancement and contribution to the green infrastructure network to be an integral part of urban extensions. Ecological requirements and targets should be outlined as part of the green infrastructure requirements for each proposed growth area.
- 24) The document is full of planning jargon that disguises the deficiency in infrastructure.
- 25) Consideration should be given to providing an entirely new town. This would allow for all the infrastructure to be provided on site and would provide an alternative focus and reduce the need to travel to Northampton.
- 26) Concern that major infrastructure requirements (i.e. Flore-Weedon bypass) may take precedence over 'softer' infrastructure elements which are equally as important for improving the quality of life of residents.
- 27) See Government priorities for transport – *Delivering a Sustainable Transport System (DaSTS) Development*. Core Strategy is focussed on transport improvements, whilst there are some parts of the network that will require improvement, East Midlands Development Agency have also highlighted sewage treatment capacity and electricity as key pressure areas. In line with PPS12: *Local Spatial Planning* consultation with these utility delivery agents must be pursued to establish the need for improvements.
- 28) The Core Strategy must acknowledge the implications of the emerging Community Infrastructure Levy and its relationship with development obligations, particularly if obligations are to be standardised across the whole planning area as is implied by the document.
- 29) Further guidance is required on the expected contributions from developers. Guidance should state that developers do not have to contribute to pooled contributions when infrastructure / services are not relevant to a particular scheme.
- 30) Mechanism should be included to enable developers to be reimbursed when they have funded the early delivery of infrastructure.

Question 52

Question – Are there any other comments that you would like to make regarding the Emergent Joint Core Strategy.

Summary of Key Points Raised in the Responses:

Consultation

- 1) Insufficient time was given for the public to review and comment on the *Emergent Joint Core Strategy*. This period should have been extended by two months as the government requirement is for 12 weeks.
- 2) The consultation period should not have occurred over the summer holiday period.
- 3) The plan is written as if the reader has an assumed knowledge of planning.
- 4) The consultation period seems to have been timed and be of a length designed to discourage responses.
- 5) Exhibitions were too few and held during working hours when many people would not be able to attend.
- 6) The public were not given adequate notice of the consultation period, either during or before it.
- 7) The length of time given for consultation is not commensurate with the length of time it has taken to prepare this document.
- 8) The questionnaire is too long, complicated and full of subjective statements.
- 9) The questions are couched in such terms that responses to them are biased towards the affirmative. For example, "Do you support X"? People will tick either yes or no but qualify it in the comments section. However, it is likely that only the yes or no answers will be counted, rather than the comments.
- 10) A more inclusive consultation approach should have been adopted. For example, a simplified template summarising the main elements, with opportunities to indicate 'for' or 'against' would have enabled participation by the majority.
- 11) The 56 questions contain a large number of unrelated side issues, which are not directly relevant to the siting and suitability of a sensible and structured forward plan.

Question 52 (consultation) continued

- 12) The website could not be accessed and/or was not user friendly.
- 13) The consultation process demonstrates a lack of respect for local residents.
- 14) It would have been easier to answer the questions about location if a summary description of each location as it is now was followed by a summary description of what it would be in the future.
- 15) The on-line comments system could have been improved by ensuring that contributor's names were anonymous. This could lead to privacy issues.
- 16) Presentations in all affected villages have not taken place. Where presentations did take place, they were often inadequate being simply a few sheets of paper on a wall and/or being unattended by a representative of the Joint Planning Unit (JPU).
- 17) There is an over-reliance on web-based consultation. Many persons in West Northamptonshire do not have Internet access and are therefore prejudiced by this approach.
- 18) The document is incomplete and should not have been released for comment.
- 19) A word version of the questionnaire should have been made available online for comment.
- 20) Asking people to suggest alternatives for development they oppose is unfair and unreasonable and is a disincentive to providing a response.
- 21) Multiple consultations have been occurring at the same time as this document (e.g. *Northampton Central Area Action Plan*). This makes it difficult for the public to tackle all of these.
- 22) The consultation process is tokenism/a tick box exercise and will not take into account the views of the electorate.
- 23) The consultation is not commensurate with the scale of development proposed. For example, if one house were being constructed, letter would notify all neighbours. However, 18,000 homes are proposed and not one individual household received a notification letter.
- 24) Shorter area specific versions of the plan should have been used during consultation. These would have been easier to understand.
- 25) No Statement of Community Involvement has been produced for West Northamptonshire.

Question 52 continued

Drafting

- 1) More detailed and precise plans should be used, rather than the inaccurate blobs shown.
- 2) The document is not written in plain English and is difficult for the average member of the public to understand.
- 3) The *Emergent Joint Core Strategy* is too long and uses terminology and phrases that are incomprehensible to the general public.
- 4) The plan is vague and contains little detail.
- 5) The document appears to have been put together hastily. It contains material errors and should not have been released for comment until these were corrected.

Principle of Growth

- 1) This document is based on the flawed assumption that all growth is good.
- 2) Saying “no is not an option to the principle of growth” is undemocratic and annoying.
- 3) It is not the right of central or regional government to impose their own ill-considered ideas onto the residents of our county.
- 4) Rather than saying no to the principle of growth, surely it should be possible to say “*No for the moment, possibly yes in the future, if an economic upturn can reasonably be expected to provide the necessary jobs and mortgages to finance such massive growth*”.
- 5) The government’s need for new housing has arisen due to its total failure to address immigration.
- 6) The need for this level of housing is no longer justified. The buy to let phenomenon has receded, as many are trying to sell their properties before values rise again. In view of the strong and extended housing boom, the bust will take longer to be eradicated from the system.
- 7) Family units should be encouraged to stay together and not split up, thus reducing home ownership and giving a better quality of life.
- 8) The levels of growth proposed should accord with natural population increase only.

Question 52 continued

Impact of Growth

- 1) This development will be located on prime agricultural land at a time when the government is advocating growing more food and bio-fuel crops in the UK due to growth in the third world and climate change.
- 2) Destroying green field sites to satisfy the desires of planners is sacrilege.
- 3) The proposed growth will destroy the character of villages and turn West Northamptonshire into an amorphous concrete jungle.
- 4) The proposed growth will result in acres of housing estates with unruly teenage “hoodies” on motorcycles. This does not apply to the majority of young people, but the other kind is out there, and we hear about them every day.
- 5) The plan will simply create dormitory areas for persons working in Milton Keynes and further afield.
- 6) The plan will change our lifestyle for the worse.
- 7) This scheme will give rise to high levels of pollution, including light, noise and air pollution.

Alternatives

- 1) The plan does not adequately evaluate alternatives.
- 2) All growth should be directed to a new town.
- 3) The options proposed bear no resemblance to those previously proposed in the issues and options consultation. The proper course of action would have been to prepare a revised issues and options report before this preferred options report.
- 4) Brownfield sites need to be developed before any green field ones. NBC have indicated previously that up to 70% of new growth can be accommodated on brown field sites. How come this is not being promoted actively in the *Emergent Joint Core Strategy*? Furthermore, government policy actively promotes use of brown field sites ahead of green field.
- 5) Development should be focussed on regeneration of the south and west of the county where many half completed developments with insufficient infrastructure are found.

Question 52 (alternatives) continued

- 6) Incremental models of development are much more realistic, manageable and appropriate to suit the new and emerging economic circumstances, and indeed the likely scenario and local circumstances for years to come.
- 7) Smaller developments integrated into existing villages and communities led to the regeneration of several areas in the 1960's, 1970's and 1980's, sustained existing schools, shops and village halls whilst also increasing the range of housing and maintaining balanced communities.
- 8) The growth options suggested bear no resemblance to those suggested in earlier consultation on this plan.
- 9) Growth should be focussed on areas with the ability to generate power, with more than average rainfall and existing infrastructure, rather than West Northants.

Evidence Base

- 1) The document as a whole needs to be heavily revised to reflect updated estimates of the extent of growth.
- 2) The evidence base needs to include some central place analysis to see where people work and shop.
- 3) The research required to back up the statements in the plan is out-of-date and incomplete. As such, the options proposed are unjustified and the examination of alternatives hindered. As such, the plan is unjustified and ineffective and therefore fails to meet the tests of soundness in *Planning Policy Statement 12: Local Spatial Planning*.
- 4) In the light of the current recession, combined with the cost of food, the government has issued new directives on food production in the UK. These strategies are newer than the outdated mandates of the Joint Planning Unit (JPU).
- 5) A large part of the *Emergent Joint Core Strategy* is based on the dated Rooker Report, written seven years ago. This is hardly tackling the current issues of housing and infrastructure within Northamptonshire.
- 6) Population increase will not continue forever. By 2030, most men will be functionally sterile.
- 7) The evidence base was produced during a period of economic growth. It needs to be revised to reflect the effect of the present recession.

Question 52 (evidence base) continued

- 8) No reference is made to the *Daventry Environmental Sensitivity and Green Infrastructure Study* which was included in the *Daventry Infrastructure Strategy*.
- 9) No evidence of the levels of infrastructure needed has been put forward. Furthermore, this infrastructure needs to be in place before any new development is built.
- 10) No *Strategic Housing Land Availability Assessment (SHLAA)* or *Urban Capacity Study* has been produced to support the *Emergent Joint Core Strategy*.
- 11) The Core Strategy should consider the implications for the area of the anticipated opening of High Speed 2, between London and Birmingham.

Legal/Policy Context

- 1) The *Emergent Joint Core Strategy* is not aligned with the *Regional Spatial Strategy 8 (RSS 8)* and should not be worked on until the review of the *RSS 8* is complete. In particular, housing figures beyond 2026 should be removed from the *Emergent Joint Core Strategy*, as these are most likely to change.
- 2) The *Emergent Joint Core Strategy* should be supported by strategies already in place such as the *Brackley Masterplan*.
- 3) Considering growth beyond 2026 prejudices the outcome of the *RSS 8* review. Option 2 of the *East Midlands Regional Plan* options specifies growth of the urban area of Northampton. This is identical to the option put forward for Northampton in the *Emergent Joint Core Strategy*. As such, the *Emergent Joint Core Strategy* pre-empts consultation on this document and pays little regard to public opinion.
- 4) The *Emergent Joint Core Strategy* ignores the designated boundary constraints established for the West Northamptonshire Development Corporation (WNDC). This goes beyond its mandate and is therefore unlawful.
- 5) The Draft Core Strategy needs to show how it has taken account of planned growth in adjacent areas outside West Northamptonshire and the wider sub-regional and regional context.
- 6) More reference is needed throughout the document setting out how it meets *PPS1: Delivering Sustainable Development* and *PPS12: Local Spatial Planning*.

Question 52 (legal/policy context) continued

- 7) The *Emergent Joint Core Strategy* should be withdrawn as it is fundamentally flawed. It is neither justified nor effective and as such falls short of the requirements of *PPS12: Local Spatial Planning*.
- 8) The plan is deficient as it is unable to meet the criteria for soundness set out in *PPS12: Local Spatial Planning*.

Partnership Working / Governance

- 1) The partnership is too narrow. There should be involvement of non-governmental, non-political people to represent grass roots opinion.
- 2) The use of a joint study covering three boroughs is the right way to address the issues.
- 3) Get rid of the JPU and WNDC.
- 4) Disband the JPU and revert to existing bodies. Power should be returned to local government, which is democratically elected. Local planning departments must also be allocated high quality resources to cope with this.

General Comments and Omissions

- 1) No specific mention is made of “gateways” into Northampton.
- 2) The plan needs a policy specific to telecommunications infrastructure. Telecommunications play a vital role in both the economic and social fabric of communities. This is recognised by national guidance, such as *Planning Policy Guidance 8: Telecommunications*, which specifies that criteria based policies should be used.
- 3) There is no policy in the Core Strategy dealing with the development needs of Northampton’s Central Area.
- 4) The future of the Flore-Weedon bypass has not been mentioned.
- 5) Waste disposal has not been mentioned.
- 6) Northampton has either avoided taking big decisions or made bad ones. The result is a large town centre lacking in any great spaces. No main line rail station, lots of soulless/characterless suburbs and no councils working together.
- 7) What happened to the Council’s infill only policy?

Question 52 (General Comments / Omissions) continued

- 8) We are appalled at the scope and lack of thought that has gone into the overall plan of the proposed development.
- 9) There has been no proper overview of what a community needs or thought on the quality of life that will be available to the people already living in the area.
- 10) The strategy, with its various policies, is supported by the logical thinking of individuals and agencies, which understand the history and needs of the local area.
- 11) The plan will destroy a way of life that many have come to enjoy.
- 12) The plan does not make justifiable sense and is not really practical or properly thought out.
- 13) A commercial reality check is needed for all parts of the plan i.e. *“what is it for? When should it be done? Who wants it and where is the money coming from? Is it efficient? Is it green? How will it pay for itself? Is it sustainable?”*
- 14) The North Northamptonshire Joint Planning Unit has rejected *“coalescence”*. Why is this being promoted here?
- 15) The plan is obviously developer and central government driven, with little regard for the wellbeing of current or future residents.
- 16) Further clarification of environmental matters throughout the strategy should be encouraged, especially with regards to what would be achieved through climate change mitigation measures.
- 17) If this plan is about London overspill, then the results of the equally ill-conceived eastern part of Northampton and its attendant issues should be examined.
- 18) Northampton has already grown by 89% whereas the national average is 11%.
- 19) Sustainable Urban Extension (SUE) appears to be a euphemism for suburbia. Suburbs are unsustainable and over reliant on motor vehicles.
- 20) The plan does not address the fundamental issues facing West Northamptonshire which include climate change, flood and water management, sustaining quality of life, traffic congestion, health and lifestyle, food supply and developing the distinctiveness of the area.
- 21) Grange Park is a failure and indicates what is likely to happen by the creation of SUE's.

Question 52 (General Comments / Omissions) continued

- 22) How will this housing and associated infrastructure be funded? The government does not have the money and previous experience indicates that developers will find a way not to pay.
- 23) The plan is ill conceived and contradictory, with no coherent vision.
- 24) The *Emergent Joint Core Strategy* is developer led and designed to fuel the profits of developers only.
- 25) No mention has been made of faith groups, churches etc which contribute significantly to a sense of community.
- 26) The strategy does not appear to deal with the needs of the retired population that is set to increase.
- 27) It is vital that Central Government must at all times impose directives for core strategies.
- 28) The *Emergent Joint Core Strategy* is a very well thought out document, which promises much for the future of West Northamptonshire.
- 29) It is considered a conflict of interest that three Councillors who are on the Joint Strategic Planning Committee are also on the West Northamptonshire Development Corporation Committee.
- 30) It is suspected that people in the committees that will decide the plan have a commercial interest in the plans success. All committee members should therefore declare their interests.
- 31) Effects on neighbouring regions have been ignored. In places such as Birmingham and Coventry, there is a crying need for new housing, with huge areas of brownfield land available. Concentration of scarce resources in Northants will reduce availability elsewhere.
- 32) This plan has been designed solely to help Northampton achieve city status.
- 33) There is no monitoring framework set out anywhere in the *Emergent Joint Core Strategy*.
- 34) The form and location of development should recognise the zones of influence from competing urban centres (i.e. Milton Keynes and Bedford) and seek to minimise potential out-commuting.
- 35) Overall, the document needs to explain why Northampton seeks city status and how this will be achieved, preferably through objectives.

Question 52 (General Comments / Omissions) continued

- 36) Northampton came second to bottom in the performance table for local councils and its budget is likely to be cut over the next few years. As such, it shouldn't be allowed to increase its area.
- 37) No provision is made anywhere in the plan for crime prevention.

Question 53

Question – Do you support the rejection of ‘Northampton Option 2 (Northampton East)’ and ‘Northampton Option 5 (South of the M1 and South-West)’?

Summary of Key Points Raised in the Responses:

Support

- 1) Support unconditionally.
- 2) Support rejection of *Northampton Option 5 (South of M1 and South-West)* as the M1 forms a strong barrier that would separate communities and make modal shift to public transport difficult to achieve.
- 3) Support rejection of *Northampton Option 5 (South of M1 and South-West)* as allowing development beyond the M1 would adversely impact on the character of Northampton, which is neatly contained within the M1.
- 4) Support rejection of *Northampton Option 5 (South of M1 and South-West)* as this would be akin to a new settlement which would require a wide range of its own facilities.
- 5) Support rejection of *Northampton Option 5 (South of M1 and South-West)* as this option is not based on sustainable development principles compared to other options.
- 6) Support rejection of *Northampton Option 5 (South of M1 and South-West)* as it would be unlikely to foster regeneration of Northampton.
- 7) Rejection of *Northampton Option 5 (South of M1 and South-West)* is consistent with the South Northamptonshire Council Interim Rural Housing Planning Policy, which specifies that villages south of the M1 are at maximum housing capacity.
- 8) Support rejection of *Northampton Option 5 (South of M1 and South-West)* as the town has been developed enough in that direction.
- 9) Support rejection of all options as they involve development of green field land.
- 10) Support rejection of *Northampton Option 2 (Northampton East)*, as it will adversely affect wildlife in Ecton Brook Linear Park and separate this wildlife from Northampton.
- 11) Support rejection of all options, as they will involve construction on prime agricultural land.

Question 53 (Support) continued

- 12) Support rejection of *Northampton Option 2 (Northampton East)* as it is quite near a traveller's site, local tip and sewerage plant and would make this area undesirable for residents.
- 13) *Northampton Option 2 (Northampton East)* acts as the lungs for the eastern area.
- 14) *Northampton Option 2 (Northampton East)* will adversely affect the setting of the village of Ecton.
- 15) The M1 would split the town.
- 16) Support rejection of *Northampton Option 5 (South of M1 and South-West)* only.
- 17) Support rejection of *Northampton Option 2 (Northampton East)* only.
- 18) The rejection of *Northampton Option 2 (Northampton East)* is supported as Northampton and Wellingborough could merge/coalesce if it were developed.
- 19) The rejection of *Northampton Option 5 (South of M1 and South-West)* is supported as growth in this location will just become a dormitory area and encourage out commuting to Milton Keynes.
- 20) Development around the north of Northampton provides the best prospect for regenerating the town given existing transport links. Proximity to the university and Moulton College could form an educational and business hub.
- 21) These areas are already massively under pressure.
- 22) Development would be totally divorced from the town.
- 23) These sites are unsustainable.
- 24) Elongation of urban development would be a negative approach that would lead to urban sprawl and negative impacts on green infrastructure and biodiversity.
- 25) *Northampton Option 2 (Northampton East)* would have an adverse affect on green infrastructure.
- 26) *Northampton Option 2 (Northampton East)* would adversely affect sensitive landscape areas, strategic gaps and villages between Northampton and Wellingborough.

Question 53 (Support) continued

- 27) *Northampton Option 2 (Northampton East)* would have an adverse affect on the Upper Nene Valley Gravel Pits Site of Special Scientific Interest (SSI) and proposed Special Protection Areas (pSPA).

Object

- 1) *Northampton Option 5 (South of M1 and South-West)* has merit, as it will create a separate town.
- 2) Both options have good transport infrastructure, In particular, *Northampton Option 2 (Northampton East)* can be easily accessed from the A45 and A4500. *Northampton Option 5 (South of M1 and South-West)* is close to the M1, rail infrastructure and the canal, which provide good links to London.
- 3) Growth should continue where logistics are already in place.
- 4) *Northampton Option 5 (South of M1 and South-West)* seems workable.
- 5) Although also somewhat removed from Northampton and therefore not having good linkages between the old and new communities, the Junction 16, M1 option has been chosen. However, this same rationale has been used to reject *Northampton Option 5 (South of M1 and South-West)*.
- 6) One of the reasons given for rejecting *Northampton Option 5 (South of M1 and South-West)* is that development beyond the M1 would not be consistent with the character of Northampton. This is a subjective statement that depends on the scale of development proposed and mitigation put in place.
- 7) The Draft Sustainability Appraisal Report identifies Northampton North, Northampton West and Northampton South-East all as areas with a medium to high landscape and visual sensitivity. However, these are preferred options although effects on similar landscapes occur in Options 2 and 5.
- 8) Has a pure employment site, like that considered appropriate at Junction 16, M1 been considered for *Northampton Option 5 (South of M1 and South-West)*? If so, then the assessment for *Northampton Option 5 (South of M1 and South-West)* is inconsistent with that undertaken for Junction 16, M1.
- 9) Supporting the rejection of these options implies support for those options considered appropriate.

Question 53 (Object) continued

- 10) *Northampton Option 5 (South of M1 and South-West)* has been rejected for political reasons.
- 11) Development of *Northampton Option 5 (South of M1 and South-West)* would be easy to attach to Northampton and would provide the least disturbance to the villages.
- 12) The M1 is an artificial man-made barrier that could be overcome with an underpass. Accordingly, *Northampton Option 5 (South of M1 and South-West)* should not be rejected.
- 13) The reasons given for the rejection of *Northampton Option 2 (Northampton East)* and 5 are very brief and provide little explanation. As such, the consideration of alternatives has not been carried out appropriately, is therefore not justified and the plan fails to meet one of the soundness tests in *Planning Policy Statement 12: Local Spatial Planning (PPS12)*.
- 14) The Northampton Highgate site, which is located within the *Northampton Option 5 (South of M1 and South-West)* area, would include a new rail link between Northampton and Milton Keynes. This would deliver modal shift in a way that no other site can and is therefore most sustainable when mix of uses is also considered. This rail link would also mean some reliance on Northampton and Milton Keynes for the provision of essential goods and services, thereby meaning these areas will not become towns in their own right. It is noted that Network Rail conditionally supports this new link and station.
- 15) Although located beyond the M1, good linkages between *Northampton Option 5 (South of M1 and South-West)* and Northampton can still be provided.
- 16) Both rejected options would provide large population bases that could work within Northampton. As such, they will contribute to its regeneration.
- 17) These options bear no resemblance to those considered in 2007's issues and options.
- 18) The argument that the M1 provides a strong physical barrier is laughable. The A45 is no less a barrier yet development beyond it is being considered.
- 19) Housing in these areas would destroy precious green belt.
- 20) *Northampton Option 5 (South of M1 and South-West)* should be re-considered in light of the new high-speed rail link.

General Comments

- 1) The reasons given for rejecting *Northampton Option 2 (Northampton East)* are interesting in that birds are considered more than people.
- 2) Land between the M1/A508 branch line should be considered.
- 3) The reasons given for rejecting these options apply equally to the preferred options for Northampton.

Question 54

Question – Do you support the rejection of ‘Daventry Option 1 (Daventry East)’, ‘Daventry Option 2 (Daventry West)’, ‘Daventry Option 3 (Daventry North West)’ and ‘Daventry Option 7 (Daventry South)’?

Summary of Key Points Raised in the Responses:

Support

- 1) Unanimous support.
- 2) Support the rejection of *Daventry Option 2 (Daventry West)*, given its high landscape value and current industrial operations.
- 3) *Daventry Option 1 (Daventry East)* is unsuitable for development and should be rejected.
- 4) Support rejection of *Daventry Option 3 (Daventry North West)*. The area is already overdeveloped.
- 5) Support rejection of *Daventry Option 7 (Daventry South)*.
- 6) As well as the issues listed, *Daventry West* should also be rejected as it drains into Warwickshire and ultimately to the Severn Estuary and occupies land that would conflict with a potential extension of the A45 Daventry Bypass.
- 7) All options would exacerbate flood risk and should therefore be rejected.
- 8) Agree with rationale that the A43 would split the town.
- 9) Views across the Learn Valley, Fox Hill, Newnham Hill and Big Hill as well as the heritage area near Braunston are all crucial to the area.
- 10) These areas are not needed for housing.
- 11) This land is prime agricultural land that will be needed for food and bio-fuel production. This need would be compromised by housing.
- 12) All options would increase congestion and “rat-running” through the rural roads of Daventry.
- 13) Agree that woodland and landscape should be preserved.
- 14) Housing development in these areas will destroy precious green belt land.

Question 54 continued

Object

- 1) Disagrees with the rejection of *Daventry option 3 (Daventry North West)* since it is a block of land on which some significant development has already taken place. It appears that local political pressure has influenced the decision making process for this site and that the grounds used to make this decision and explain why this option does not meet the vision and objectives of the *Emergent Joint Core Strategy* are equally valid in a decision to reject the Daventry North site.
- 2) Disagrees with the rejection of *Daventry Option 7 (Daventry South)* because the reasons provided do not meet the vision and objectives of the *Emergent Joint Core Strategy* and have the same validity when applied to the Daventry North site.
- 3) There are a number of statements made that equally apply to areas proposed as suitable for development.
- 4) Daventry Option 1 (Daventry East) is similar to Daventry Option 3 (Daventry North East) and *Daventry Option 1 (South East)* which have been supported.
- 5) As *Daventry Option 3 (Daventry North West)* already contains industrial development, it could substitute for the South East gateway site.
- 6) *Daventry Option 6 (Daventry North)* should also be excluded from development as Borough Hill would physically separate any development here from the balance of Daventry and not contribute to Daventry's regeneration.
- 7) *Daventry Option 1 (Daventry East)* can accommodate more development.
- 8) These reasons are weak and need to be strengthened, particularly with respect to infrastructure.
- 9) The reasons given for rejecting *Daventry Option 2 (Daventry West)* apply equally to Daventry Option 1 (South East), which has not been rejected.
- 10) Daventry Option 4 (North East) should also be rejected, as it will have a high impact on the landscape character of the area.
- 11) Daventry Option 1 (Daventry East) is the best option as it is close to the M1, A5 and rail route to London.
- 12) Daventry Option 1 (Daventry East) is required in order for the *Emergent Joint Core Strategy* to meet the housing requirements set out in the *Regional Spatial Strategy*.

Question 54 (Object) continued

- 13) *Daventry Option 1 (Daventry East)* will not have an unacceptable impact on Borough Hill, as a well designed scheme can incorporate it with out adversely affecting its character.
 - 14) *Daventry Option 1 (Daventry East)* is not remote from Daventry as it can be linked via a high quality public transport link.
 - 15) *Daventry Option 1 (Daventry East)* would be a sustainable community.
 - 16) In addition to the reasons given, *Daventry Option 1 (Daventry East)* should also be rejected due to generating traffic flows away from the town along the A45. This is an unsustainable pattern of development and contributes greatly to congestion on the A45/A5 junction.
 - 17) The *Emergent Joint Core Strategy* omits to consider the potential for housing delivery in the existing urban area.
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Question 55

Question – Do you support the rejection of ‘Towcester Option 2 (Towcester West)’, ‘Towcester Option 3 (Towcester North-West)’, ‘Towcester Option 5 (Towcester Racecourse)’, ‘Towcester Option 6 (Towcester North)’, ‘Towcester Option 7 (Towcester to Silverstone Lung)’ and ‘Towcester Option 8 (East of Silverstone Lung)’?

Summary of Key Points Raised in the Responses:

Support

- 1) Support the rejection of the Towcester options for the reasons outlined in the report.
- 2) Compliment the Joint Planning Unit (JPU) for explaining why development on this scale with the avoidance of brown field sites is not feasible.
- 3) Possibility of increasing flood risk.
- 4) Smaller local developments offer more control and local involvement.
- 5) The development is too large, does not offer significant benefits and would ruin community spirit.
- 6) The development is not needed.
- 7) *Towcester Option 5 (Towcester Racecourse)* is part of the Grade II* park and garden of Easton Neston House and includes Grade I Listed Buildings. Growth here would prejudice the setting of the park and garden and result in the loss of the racecourse which plays a vital cultural and tourism role. Totally unacceptable on landscape, social and economic grounds.
- 8) Support the reasons for rejecting *Towcester Options 7 (Towcester to Silverstone Lung)* and *Towcester Option 8 (East of Silverstone Lung)*, which also serve to highlight that Silverstone itself is not an appropriate location for development unless directly related to its use as a motor circuit.
- 9) The only viable direction is *Towcester Option 1 (Towcester South)*; there are no other suitable directions for growth. This is supported by the Environmental Statement submitted by Persimmon and Bloor.
- 10) Growth further to the south i.e. *Towcester Option 1 (Towcester South)* and *Towcester Option 8 (East of Silverstone Lung)*, would be too remote to be sustainable and support the regeneration of the town centre.

Question 55 (Support) continued

- 11) Towcester is confined by barriers (A43/A5) and the plan is to support cycling and walking.
- 12) Growth to the West (*Option 2 (Towcester West), Option 3 (Towcester Northwest) and Option 7 (Towcester to Silverstone Lung)*) would be beyond the A43 and the floodplain of the River Tove. This would add to the separation and segregation from the town and preclude sustainable modes of travel.
- 13) Growth to the north *Towcester Option 6 (Towcester North)* suffers similar problems to growth to the west, with the barrier presented by the A43, A5 and the River Tove floodplain. There are also landfill issues.
- 14) The rejection of these options appears sensible.
- 15) Housing development in these areas will destroy precious green belt.
- 16) Support the rejection of strategic growth to the north, west and north-west. However opportunity does exist for smaller scale extension to the north adjacent to the settlement boundary and within the A43.

Object

- 1) Would imply support for other options.
- 2) Insufficient growth is being provided in this town.
- 3) Support *Towcester Option 8 (East of Silverstone Lung)* in comparison to others. *Towcester Option 8 (East of Silverstone Lung)* could be included in the preferred option to make it bigger as there are no landscape, cultural or environmental objections here.
- 4) There is infill potential which would have minimal impact on the rural landscape.

General Comments

- 1) Insufficient knowledge of the areas to comment. Leave the decision of local residents.
- 2) *Towcester Option 3 (Towcester Northwest)* – would be difficult to resist pressure to join *Towcester Option 3 (Towcester Northwest)* with Greens Norton.
- 3) Towcester North has all the disadvantages listed but does have the advantage of good access to A43 and Northampton.

Question 55 (General Comments) continued

- 4) *Towcester Option 7 (Towcester to Silverstone Lung)* and *Towcester Option 8 (East of Silverstone Lung)* would have good access to A43, but would join Towcester to Silverstone. May be considered in the distant future.
 - 5) Any further extension might be done by extending Towcester South to join up with Paulerspury which could be served by bus to Milton Keynes.
 - 6) Insufficient information provided on each option.
 - 7) Support the comments regarding archaeology in *Towcester Option 6 (Towcester North)*.
 - 8) Reasons for rejecting *Towcester Option 3 (Towcester Northwest)* should include reference to significant archaeological remains.
 - 9) The *Towcester Masterplan* needs to be taken into account.
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Question 56

Question – Do you support the rejection of 'Brackley Option 1 (Brackley South)' and 'Brackley Option 2 (Brackley North West)'?

Summary of Key Points Raised in the Responses:

Support

- 1) *Brackley Option 1 (Brackley South)* makes no sense, and the physical separation and lack of connectivity to the town centre is an impediment. It would affect valuable cultural and biodiversity assets.
- 2) *Brackley Option 2 (Brackley North West)* moves people further from the town centre.
- 3) Support rejection for the reasons outlined in the report.
- 4) Compliment the Joint Planning Unit (JPU) for explaining why development on this scale with the avoidance of brown field sites is not feasible.
- 5) Options need to support regeneration in Brackley Town Centre.
- 6) Development not needed.
- 7) Redevelopment would be too large for Brackley.
- 8) These are unviable given the nature of the environment and lay-out of current facilities.
- 9) The rejection of these options seems sensible, in principle.
- 10) Unacceptable on grounds of isolated locations, landscape conservation and would provide no benefit to the existing centre and facilities.
- 11) The successful growth and regeneration of Brackley will be delivered by expansion incorporating *Brackley Option 3 (Brackley North)*, the former sawmill site and *Brackley Option 4 (Brackley East)*.
- 12) Housing development would destroy precious areas of greenbelt.
- 13) Neither option would deliver a sustainable urban extension.
- 14) Brackley Option 2 (North West) is too far removed from the water treatment works.
- 15) Supports the vision for Brackley.

Question 56 (Support) continued

- 16) Better options have been identified.
- 17) Brackley is a country town, similar to a Cotswold town, and should be retained as such.
- 18) Support the rejection of *Brackley Option 1 (Brackley South)*, which is in a flood zone.

Object

- 1) This implies support for other options.
- 2) Insufficient growth is provided by the plan.
- 3) Support *Brackley Option 1 (Brackley South)*, which is a sustainable location. A bridge could give access to the town and there would be good access to the A43/A422. The area of Evenley Park should be avoided.
- 4) *Brackley Option 2 (Brackley North West)* should be preferred as all access routes could be on to the A422 and will not impact on existing narrow estate roads.
- 5) *Brackley Option 3 (Brackley North)* should have been rejected because of the poor access roads to and from the site.
- 6) The reasoning for rejecting options is weak, i.e. 'will not enhance character' and 'won't foster regeneration of the town centre'.
- 7) Any development in Brackley should be limited to the eastern area.
- 8) Disagree with the proposal to reject Brackley Option 2 (North West). The impacts on matters such as air quality, landscape and road access are no different to the preferred option of Brackley Option 3 (Brackley North). A fuller report and assessment of options is required.
- 9) Good complimentary development to the town.

General Comments

- 1) Insufficient knowledge of the areas to comment. Leave the decision to local residents.
- 2) Brackley South could be looked at again in the future as it is within walking distance of the town centre and close to the Tesco supermarket.

Question 56 (General Comments) continued

- 3) Brackley Option 2 (Brackley North West) could provide an orbital road from the A422 to Halse Road and should be kept in reserve.
 - 4) These sites would have a greater impact on the historic environment, notably Evenley Hall and the setting of Steane Park.
 - 5) Insufficient information provided.
 - 6) The rejection of *Brackley Option 2 (Brackley North West)* has not been fully justified. It could provide a contingency that meets the objectives of the Core Strategy.
 - 7) Brackley development should be coordinated with Banbury and Oxford.
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