

Item No: 9
Date: 25 July 2011

WEST NORTHAMPTONSHIRE

JOINT STRATEGIC PLANNING COMMITTEE

West Northamptonshire Joint Core Strategy Pre-Submission Version - Representations

REPORT OF THE HEAD OF THE JOINT PLANNING UNIT

1. Purpose

1.1 The purpose of this report is:

- 1) To provide a summary of the Representations Stage of the Joint Core Strategy Preparation Process (Regulations 27 and 28) including the requirements of the Regulations and how these have been met;
- 2) To provide a quantitative analysis of the representations to the Pre-Submission version of the Joint Core Strategy including details of the total number of representations, and whether the representations concerned legal compliance and/ or soundness, and what aspect of soundness;
- 3) To provide a factually based summary of the main issues raised by the representations to Pre-Submission version of the Joint Core Strategy (Attached as Appendix 2 to this report); and
- 4) To set out the next stages of the Joint Core Strategy preparation process.

2. Recommendations

2.1 That the Joint Strategic Planning Committee:

- 1) Notes the summary of the Representations Stage of the Joint Core Strategy Preparation Process (Regulations 27 and 28) including the requirements of the Regulations and how these have been met;
- 2) Notes the quantitative analysis of the representations to the Pre-Submission version of the Joint Core Strategy;
- 3) Notes the factually based summary of the main issues raised by the representations to Pre-Submission version of the Joint Core Strategy (Attached as Appendix 2 to this report); and
- 4) Notes the next stages of the Joint Core Strategy preparation process.

3. Introduction to the Pre-Submission Joint Core Strategy

- 3.1 Both the current West Northamptonshire Local Development Scheme approved in February 2010 and the draft updated West Northamptonshire Local Development Scheme that is the subject of Agenda Item 8 of this meeting set 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 Daventry District, Northampton Borough and South Northamptonshire administrative areas – 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 and South Northamptonshire Council are working together to produce a Joint Core Strategy for their collective areas. The partner authorities are working in close co-operation with Northamptonshire County Council and the West Northamptonshire Development Corporation to produce the Joint Core Strategy and ensure the delivery of development and infrastructure.
- 3.4 At its meeting on 31 January 2011 the West Northamptonshire Joint Strategic Planning Committee approved the publication of the Pre-Submission version of the West Northamptonshire Joint Core Strategy for the statutory six weeks representation period in accordance with Regulations 27 and 28 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.
- 3.5 The content of the Pre-Submission Joint Core Strategy was informed by the Joint Core Strategy Issues and Options and Regulation 25 consultations in 2007 and 2009 respectively, the Emergent Joint Core Strategy in 2009, as well as the collection of a wide ranging evidence base and on-going work with technical bodies.
- 3.6 The Pre-Submission version of the Joint Core Strategy sets out the long-term vision and objectives for the whole of the West Northamptonshire area for the period up to 2026, including strategic policies for steering and shaping development. It identifies specific locations for strategic new housing and employment and changes to transport infrastructure and other supporting community facilities, as well as defining areas where development will be limited. It helps to ensure the co-ordination and delivery of other services and related strategies.

4. Introduction to the Representations Stage of the Joint Core Strategy Preparation Process (Regulations 27 and 28)

The Statutory Stages

4.1 As a statutory requirement the Joint Core Strategy must be prepared in accordance with the relevant primary and secondary legislation, i.e. the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2004 as amended by the 2008 Regulations. These Regulations are very important because they prescribe the form and content of development plan documents, including the Core Strategy, and the procedure to be followed in their preparation. The Regulations set out the statutory stages including the nature of public participation and the requirements for publication and submission of documents, including the length of the representations period.

4.2 The statutory stages are:

- Regulation 25 – Public Participation from Commencement to Proposed Submission
- Regulation 27 – Publication of the Proposed Submission Development Plan Document (also known as Pre-Submission)
- Regulation 30 – Submission of the Development Plan Document
- Regulation 34 – Independent Examination of the Development Plan Document
- Regulation 35 – Publication of the Inspector's Report
- Regulation 36 – Adoption of the Development Plan Document

4.3 In relation to the Pre-Submission Joint Core Strategy, Regulations 27 and 28 set out the nature of publication, how representations must be made and the length of the representations period.

The Requirements set out in the Regulations

4.4 Table 1 in Appendix 1 sets out what the Regulations require at the Pre-Submission stage and how these requirements have been met. All the requirements of the Regulations were met.

Statements of Community Involvement

4.5 In addition to meeting the requirements of the Regulations the process of community involvement for the Joint Core Strategy must be in accordance with the three Statements of Community Involvement (SCIs) which have been adopted by Daventry District, Northampton Borough and South Northamptonshire Councils. The adopted SCIs set out the Partner Councils' strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs) and the consideration of planning applications. The Statement of Community Engagement and Consultation that was published alongside the Pre-Submission version of the Joint Core Strategy

sets out how consultation has been undertaken throughout the document's preparation in accordance with the adopted SCIs.

Soundness Tests

- 4.6 Under the Local Development Framework system, the examination of the plan document has taken on a wider and significantly different role from Local Plan Inquiries. Although representations to the Plan will still be considered, as in the former system (and must be addressed by the Inspector), the primary purpose of the examination is to consider whether the Plan is "sound", which essentially means "well-founded" and meets legal requirements.
- 4.7 Through the examination, soundness will be judged through three tests. The presumption is that the Plan is sound, unless as a result of considering the representations made and evidence considered at the examination, it is proved not to be. This means that the representations to the Pre-Submission version of the Joint Core Strategy had to relate to the three tests of soundness listed below, and/ or legal compliance.
- 4.8 To be "sound" a core strategy should meet the following three tests:
- a) "Justified" means that the Plan must be: founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives;
 - b) "Effective" means that the Plan must be: deliverable and flexible; and
 - c) Consistent with national policy.

5. Representations to the Pre-Submission Joint Core Strategy

- 5.1 The statutory six weeks period for representations to be made to the Pre-Submission version of the Joint Core Strategy was from Thursday 17 February 2011 until Thursday 31 March 2011.
- 5.2 A total of 4,056 individual representations were duly made by 818 individuals and organisations. Duly made representations are representations that were made within the representations period and address the soundness or legality of any part of the Pre-Submission version of the Joint Core Strategy.
- 5.3 Table 2 in Appendix 1 of this report sets out the total number of duly made representations by Policy and Section of the Joint Core Strategy. The table also details whether the representation is concerning legal compliance and/ or soundness, and what aspect of soundness. Table 3 in Appendix 1 of this report lists the specific and general consultation bodies and is referred to in Table 2 of the same appendix.
- 5.4 A total of 57 not duly made representations were received from 19 individuals and organisations. Of these 3 representations were received that did not address the soundness of any part of the Pre-Submission version of the Joint Core Strategy. 54 representations were received after the 31 March 2011. All of these respondents have been notified that their representations are not duly made. All not duly made representations will, however, in due course be sent alongside the duly made representations to the Planning Inspectorate for

consideration as part of the formal examination of the Joint Core Strategy and it will be at their discretion as to whether they will be accepted.

- 5.5 All the representations have been logged and an acknowledgement sent to each respondent. All representations to the Pre-Submission version of the Joint Core Strategy are available to view on the Joint Planning Unit's consultation website or at the Joint Planning Unit's office in Northampton.
- 5.6 A factually based summary of the main issues raised by the representations to the Pre-Submission version of the Joint Core Strategy has been prepared by the Joint Planning Unit and is attached to this report as Appendix 2.
- 5.7 At its meeting on 3 October 2011 the West Northamptonshire Joint Strategic Planning Committee will receive the officers' recommended response to the representations including how the representations have been taken into account alongside the Submission version of the Joint Core Strategy for the Committee's approval for Submission.

6. Next Stages

- 6.1 As set out above all representations to the Pre-Submission Joint Core Strategy will be considered and the Submission version of the Joint Core Strategy prepared by October 2011. The Submission version will be submitted to the Planning Inspectorate for consideration at an independent Public Examination. This Examination will test the soundness of the Joint Core Strategy and consider representations on the basis of whether the plan is sound.
- 6.2 Subject to the timing of the enactment of the Localism Bill, which may change the nature of the Inspector's Report and the final stages of plan preparation, the Inspector, appointed by the Secretary of State to conduct the Examination, will produce a report with recommendations which will be binding. Any changes required by the Inspector will be incorporated and then the Joint Core Strategy will be adopted. The adoption of the Joint Core Strategy will be advertised. It is expected that the Joint Core Strategy will be adopted in August 2012 and published shortly afterwards.

APPENDIX 1

Table 1 – Regulations 27 and 28 Requirements

Regulation 27 – Publication of a Development Plan Document	
Requirement in the Regulation	How the Requirement in the Regulation has been met at the West Northamptonshire Joint Core Strategy Pre-Submission Stage (February 2011)
Before submitting a DPD to the Secretary of State under section 20, the local planning authority must -	
(a) Make a copy of each of the proposed submission documents and a statement of the representations procedure available for inspection during normal office hours – (i) At their principal office, and (ii) At such other places within their area as they consider appropriate	The proposed submission documents (i.e. the Joint Core Strategy, the Sustainability Appraisal, the Appropriate Assessment, the Statement of Community Engagement and Consultation and the three Statements of Community Involvement) and a statement of the representation procedure were made available at the following locations during normal office hours: <ul style="list-style-type: none"> • The main offices of Daventry District Council, Northampton Borough Council, Northamptonshire County Council, South Northamptonshire Council and West Northamptonshire Development Corporation; • All Libraries within West Northamptonshire; and • Some libraries in areas adjoining West Northamptonshire.
(b) Publish on their website – (i) The proposed submission documents (ii) A statement of the representations procedure, and (iii) A statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected	The proposed submission documents (as listed above), a statement of the representation procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected were all published on both the main West Northamptonshire Joint Planning Unit website and the consultation portal for the Joint Core Strategy.
(c) Send to each of the specific consultation bodies invited to make	The proposed submission documents and a statement of the

<p>representations under Regulation 25 (1) for the purposes of the DPD –</p> <p>(i) A copy of each of the proposed submission documents, and</p> <p>(ii) A statement of the representations procedure</p>	<p>representations procedure were sent to each of the specific consultation bodies listed in Regulation 25 (1). These bodies are listed in Table 3 of Appendix 1 of this report.</p>
<p>(d) Send to each of the general consultation bodies invited to make representations under Regulation 25 (1) for the purposes of the DPD –</p> <p>(i) A statement of the representations procedure, and</p> <p>(ii) A statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected</p>	<p>The proposed submission documents, a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected were sent to each of the general consultation bodies listed in Regulation 25 (1). These bodies are listed in Table 3 of Appendix 1 of this report.</p>
<p>(e) Give by local advertisement notice which sets out –</p> <p>(i) A statement of the representations procedure, and</p> <p>(ii) A statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected.</p>	<p>Local advertisement notices setting out a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected were published in the Brackley and Towcester Advertiser on 11 February 2011 and in the following newspapers: Daventry Express, Harborough Mail, Milton Keynes Citizen, Northampton Chronicle & Echo, Northampton Herald and Post and the Rugby Advertiser on 17 February 2011 (which was the first day of the six week representations period).</p>
<p>Regulation 28 – Representations relating to a Development Plan Document</p>	
<p>Requirement in the Regulation</p>	<p>Met by West Northamptonshire Joint Core Strategy Pre-Submission Stage (February 2011)</p>
<p>(1) Any person may make representations about a DPD which a local planning authority propose to submit to the Secretary of State.</p>	<p>The representations period for the Pre-Submission version of the West Northamptonshire Joint Core Strategy was six weeks from 17 February 2011 until 31 March 2011.</p>
<p>(2) Any such representations must be –</p>	

<p>(a) Made within the period which the local planning authority specify for the purposes of this paragraph; and</p> <p>(b) Sent to the address, and if the local planning authority think it appropriate to specify a person, the person, which the local planning authority specify for the purposes of this paragraph.</p>	<p>Representations could be submitted on-line through the Joint Core Strategy consultation portal, by email, by post and by fax.</p> <p>The Joint Planning Unit considered it unnecessary to specify an individual to which representations should be sent.</p>
<p>(3) The period which the local planning authority specify for the purposes of paragraph (2) must be a period of not less than six weeks starting on the day on which notice given pursuant to regulation 27 (e) is first published.</p>	

APPENDIX 1

Table 2 - Summary Table of Representations by Policy in the Pre-Submission Joint Core Strategy

Policy/ Section	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Foreword	0	0	0	0	0	0	0	0	0
1.0 The Representation Arrangements	2	2	0	0	2	1	1	0	0
2.0 Contents and List of Policies	0	0	0	0	0	0	0	0	0
3.0 Introduction	98	97	1	4	94	86	7	1	0
4.0 Spatial Portrait, Vision and Objectives									
Introductory Text	7	7	0	5	2	0	1	1	0
Spatial Portrait	30	30	0	11	19	10	8	1	0
Spatial Vision	16	15	1	9	7	2	4	1	0
Spatial Objectives	17	14	3	10	7	1	3	3	0
5.0 Spatial Strategy									
Introductory Text	43	37	6	14	29	11	10	6	2
S1 – The Distribution of Development	91	85	6	16	75	56	14	4	1
S2 – Hierarchy of Centres	19	19	0	9	10	3	4	3	0

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		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
S3 – Scale & Distribution of Housing Development	92	53	39	11	81	32	26	23	0
S4 – Northampton Related Development Area	159	150	9	3	156	74	75	7	0
S5 – Sustainable Urban Extensions	43	31	12	8	35	15	13	7	0
S6 – Phasing of Housing Development	25	10	15	4	21	8	7	6	0
S7 – Provision of Jobs	19	16	3	9	10	4	4	2	0
S8 – Distribution of Jobs	35	27	8	7	28	12	10	5	1
Policy S9 – Distribution of Retail Development	23	22	1	5	18	6	6	6	0
Policy S10 – Sustainable Development Principles	39	26	13	5	34	13	13	8	0
Policy S11 – Renewable Energy	8	8	0	4	4	1	0	3	0

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West Northamptonshire Wide Policies	0	0	0	0	0	0	0	0	0
6.0 Connections									
Introductory Text	12	12	0	2	10	5	4	1	0
Policy C1 – Changing Behaviour and Achieving Modal Shift	23	23	0	9	14	4	7	3	0
Policy C2 – New Developments	26	26	0	11	15	7	6	2	0
Policy C3 – Strategic Connections	16	16	0	7	9	2	7	0	0
Policy C4 – Connecting Urban Areas	8	8	0	6	2	0	2	0	0
Policy C5 – Enhancing Local and Neighbourhood Connections	9	9	0	6	3	1	1	1	0
Policy C6 – High Speed Rail 2	4	4	0	2	2	1	1	0	0

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		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
7.0 Regeneration									
Introductory Text	5	5	0	3	2	0	2	0	0
Policy RC1 – Delivering Community Regeneration	6	6	0	4	2	0	1	1	0
Introductory Text	5	5	0	3	2	0	2	0	0
Policy RC2 – Community Needs	15	9	6	6	9	4	3	2	0
8.0 Economic Advantage									
Introductory Text	7	7	0	4	3	2	1	0	0
Policy E1 – Existing Employment Areas	19	16	3	4	15	4	6	4	1
Policy E2 – New Office Floorspace	14	8	6	2	12	4	4	3	1
Policy E3 – Technology Realm, Northampton North	7	6	1	1	6	2	2	1	1
Policy E4 – Daventry International Rail Freight Terminal (DIRFT)	11	7	4	3	8	2	4	2	0

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Policy/ Section	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy E5 – Silverstone Circuit	19	11	8	3	16	5	7	4	0
Policy E6 – Education, Skills and Training	2	2	0	1	1	1	0	0	0
Policy E7 – Tourism, Visitor and Cultural Industries	6	6	0	2	4	1	2	1	0
9.0 Housing									
Introductory Text	20	17	3	2	18	7	5	2	4
Policy H1 – Housing Density and Mix and Type of Dwellings	30	30	0	4	26	10	8	8	0
Policy H2 – Affordable Housing	34	34	0	9	25	10	8	6	1
Policy H3 – Rural Exception Sites	7	5	2	4	3	0	2	1	0
Policy H4 – Specialised Accommodation	11	11	0	2	9	3	4	1	1
Policy H5 – Sustainable Housing	175	174	1	1	174	86	86	2	0

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		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy H6 – Managing the Existing Housing Stock	2	2	0	1	1	1	0	0	0
Policy H7 – Gypsies, Travellers and Travelling Showpeople	13	13	0	3	10	4	4	2	0
10.0 Built and Natural Environment									
Introductory Text	4	4	0	2	2	0	2	0	0
Policy BN1– Green Infrastructure Connections	15	11	4	7	8	2	4	0	2
Policy BN2 – Biodiversity	7	7	0	5	2	0	1	1	0
Policy BN3 – Woodland Enhancement and Creation	4	4	0	3	1	0	0	1	0
Policy BN4 – Upper Nene Valley Gravel Pits Potential Special Protection Area	4	4	0	2	2	2	0	0	0

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		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy BN5 – The Historic Environment	6	6	0	4	2	0	2	0	0
Policy BN6 – Weedon Depot	9	9	0	7	2	1	1	0	0
Policy BN7 – Flood Risk	64	64	0	5	59	5	52	2	0
Policy BN8 – The River Nene Strategic River Corridor	4	4	0	3	1	1	0	0	0
Policy BN9 – Planning for Pollution Control	17	17	0	6	11	3	6	2	0
Policy BN10 – Ground Instability	3	3	0	1	2	1	1	0	0
11.0 Infrastructure and Delivery									
Introductory Text	106	104	2	3	103	11	91	1	0
Policy INF1 – Approach to Infrastructure Delivery	179	174	5	8	171	74	85	8	4
Policy INF2 – Contributions to Infrastructure Requirements	86	77	9	6	80	11	61	6	2

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		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Infrastructure Delivery Plan Introductory Text	27	22	5	2	25	11	11	2	1
Places Policies	0	0	0	0	0	0	0	0	0
12.0 Northampton									
Introductory Text	6	6	0	0	6	3	2	1	0
Policy N1 – The Regeneration of Northampton	65	65	0	7	58	5	52	1	0
Policy N2 – Northampton Central Area	24	24	0	4	20	7	7	6	0
Policy N3 – Northampton North Sustainable Urban Extension	48	43	5	7	41	15	18	8	0
Policy N4 – Northampton West Sustainable Urban Extension	1355	326	1029	10	1345	530	474	341	0
Policy N5 – Northampton South Sustainable Urban Extension	189	188	1	4	185	95	88	2	0

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		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Policy N6 – Northampton South of Brackmills Sustainable Urban Extension	19	19	0	3	16	5	8	3	0
Policy N7 – Northampton King's Heath Sustainable Urban Extension	14	14	0	3	11	4	6	1	0
Policy N8 – Northampton North of Whitehills Sustainable Urban Extension	16	16	0	3	13	5	7	1	0
Policy N9 – Northampton Upton Park Sustainable Urban Extension	136	136	0	5	131	64	65	2	0
Policy N10 – Shopping Needs Outside Northampton Town Centre	9	9	0	1	8	3	4	1	0
Policy N11 – Supporting Areas of Community	2	2	0	1	1	0	0	0	1

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		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Regeneration									
Policy N12 – Northampton’s Transport Network Improvements	4	4	0	1	3	0	3	0	0
13.0 Daventry									
Introductory Text	6	6	0	3	3	2	1	0	0
Policy D1 – The Regeneration of Daventry Town	7	7	0	2	5	4	1	0	0
Policy D2 – Daventry Town Centre	3	3	0	2	1	0	0	1	0
Policy D3 – Daventry North East Sustainable Urban Extension	22	22	0	5	17	9	7	1	0
Policy D4 – Supporting Areas of Community Regeneration: Southbrook	1	1	0	1	0	0	0	0	0
Policy D5 – Daventry’s Transport Network Improvements	9	9	0	3	6	3	3	0	0

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		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
14.0 Towcester									
Introductory Text	3	3	0	3	0	0	0	0	0
Policy T1 – Spatial Strategy for Towcester	9	8	1	3	6	2	4	0	0
Policy T2 – The Town Centre and Moat Lane Regeneration Area	2	2	0	1	1	0	0	1	0
Policy T3 – Towcester South Sustainable Urban Extension	22	21	1	4	18	6	10	2	0
Policy T4 – Transport Improvements for Towcester	2	2	0	1	1	0	1	0	0
Policy T5 – Towcester Racecourse	3	3	0	1	2	0	1	1	0
15.0 Brackley									
Introductory Text	5	4	1	4	1	0	1	0	0
Policy B1 – Spatial Strategy for Brackley	9	9	0	6	3	1	1	1	0
Policy B2 – Brackley East Sustainable Urban Extension	9	5	4	1	8	2	3	2	1

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Policy/ Section	Total Number of Representations	Legally Compliant		Sound		Unsound – Reasons			
		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Appendix 1 – Plans and Other Strategies Taken into Account in the Preparation of the Joint Core Strategy	0	0	0	0	0	0	0	0	0
Appendix 2 – Evidence Base for the Joint Core Strategy	5	5	0	2	3	3	0	0	0
Appendix 3 – West Northamptonshire Housing Trajectory	0	0	0	0	0	0	0	0	0
Appendix 4 – West Northamptonshire Infrastructure Schedule	25	21	4	4	21	10	6	3	2
Appendix 5 – Saved Local Plan Policies to be Replaced by Joint Core Strategy Policies	3	3	0	1	2	1	1	0	0
Appendix 6 – West Northamptonshire Monitoring Framework	1	1	0	1	0	0	0	0	0

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		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
19.0 Glossary of Terms and Abbreviations	0	0	0	0	0	0	0	0	0
20.0 Maps									
Figure 1 – West Northamptonshire Context Map	0	0	0	0	0	0	0	0	0
Figure 2 – West Northamptonshire Key Diagram & Legend	4	4	0	1	3	1	1	1	0
Figure 3 – West Northamptonshire Key Diagram Enlargement	1	1	0	1	0	0	0	0	0
Figure 4 – Northampton Related Development Area Map	3	2	1	1	2	1	0	1	0
Figure 5 – West Northamptonshire Proposals Map & Insets	20	20	0	4	16	6	7	2	1

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		Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent with National Policy	Not Stated
Figure 6 – West Northamptonshire Green Infrastructure Networks Map	1	1	0	1	0	0	0	0	0
TOTAL	4056	2814	1242	490	3566	1443	1531	564	28

APPENDIX 1

Table 3 – List of Specific and General Consultation Bodies

Specific Consultation Bodies

- Statutory Organisations:
 - Government Agencies
 - Statutory Undertakers
 - Transport Organisations
 - Health Services
 - Emergency Services
 - Education
 - Environment
 - Local Government – in and adjoining West Northamptonshire including Councillors

General Consultation Bodies

- Area Partnerships and Forums

- Business Interests

- Community Groups including:
 - Allotment Associations
 - Cultural Interests
 - Conservation
 - Disabled Interests
 - Ethnic Groups
 - Faith Groups
 - Gypsies and Travellers
 - Voluntary Interests
 - Youth

- Developers

- Housing Associations

- Landowners

- Local Strategic Partnerships

- MPs/ MEPs

- Private Individuals

- Professional Organisations including Agents

- Residents Associations

- Town and Parish Councils in and adjoining West Northamptonshire

Appendix 2

Summary of the Main Issues raised by the Representations to the Pre-submission version of the West Northamptonshire Joint Core Strategy

The following schedule contains a summary of the responses received to the Joint Core Strategy in document order. Firstly, there follows a list of acronyms and abbreviations used in the schedule.

Abbreviations and Acronyms

B1 Employment use - Offices, research and development, light industry (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).

CAAP – Northampton Central Area Action Plan

CIL – Community Infrastructure Levy

CLG – Communities and Local Government

CSH – Code for Sustainable Homes

DIRFT – Daventry International Rail Freight Terminal

DDL – Daventry District Local Plan

DPD – Development Plan Document

EJCS – Emergent Joint Core Strategy

HA – Highways Agency

HCA – Homes and Communities Agency

HS2 – High Speed 2

IDP – Infrastructure Delivery Plan

JCS - Joint Core Strategy

NNJPU – North Northamptonshire Joint Planning Unit

NRDA – Northampton Related Development Area

ONS – Office for National Statistics

OS – Ordnance Survey

PDL – Previously Developed Land

PPS1 – Planning Policy Statement 1: Delivering Sustainable Development

PPS3 - Planning Policy Statement 3: Housing

PPS4 - Planning Policy Statement 4: Planning for Sustainable Economic Growth

PPS12 - Planning Policy Statement 12: Local Spatial Planning

PPS22 - Planning Policy Statement 22: Renewable Energy

RSS – Regional Spatial Strategy

SA – Sustainability Appraisal

SCS - Sustainable Community Strategy

SHLAA – Strategic Housing Land Availability Assessment

SHMA – Strategic Housing Market Assessment

S106 – Section 106 Agreement

SPD – Supplementary Planning Document

SRN – Strategic Road Network

SUE - Sustainable Urban Extension

VDS – Village Design Statement

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Foreword

Policy/ Section	Page No	No of Reprs	Summary of Main Issues Raised by the Representations
Foreword	i	0	No Representations Received.

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 1 – The Representations Arrangements

Policy/Section	Page No.	No. of Reprs.	Summary of Main Issues Raised by the Representations
The Representations Arrangements	1	2	Respondents' expressed concerns about the overall complexity of the public consultation exercise and the value placed on representations made.

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 2 – Contents Page and List of Policies

Policy/Section	Page No.	No. of Reprs.	Summary of Main issues Raised by the Representations
Contents Page and List of Policies	3	0	No Representations Received

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 3 - Introduction

Policy / Section	Page No.	No. of Reps.	Summary of Main Issues Raised by the Representations
What is the West Northamptonshire Joint Core Strategy	7	4	<p>Respondents consider that no reference is made to the Minerals and Waste Development Framework.</p> <p>Respondents consider that more reference needs to be made to the Sustainable Community Strategy (SCS) for Daventry District. A brief summary of each districts' SCS should be included in the Joint Core Strategy.</p>
Introduction	7	94	<p>A large majority of representations are standard responses and submit that the preparation of the Core Strategy ought to be halted until the enactment of the Localism Bill.</p> <p>Respondents question the validity of the Core Strategy based on the prepared evidence base studies or seek to have the document reformatted to make it more user friendly.</p> <p>Respondents state that SUEs are not in the original JCS and therefore have not been properly consulted upon.</p>

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 4 - Spatial Portrait, Spatial Vision and Objectives

Policy/ Section	Page No.	No. of Reps.	Summary of the Main Issues Raised by the Representations
Introduction	11	7	<p>The respondent supports the JCS overall approach particularly the protection of rural areas.</p> <p>The respondent considers strategic planning should be undertaken at District Council level with cooperation between authorities.</p> <p>The respondent considers a policy on rights of way should be included.</p>
The Spatial Context	11	4	<p>The respondents consider that insufficient consideration has been given to the development of Northampton in relation to strategic planning of North Northampton area, Milton Keynes and neighbouring Counties.</p> <p>The respondent is concern that the section does not describe the character, qualities and local distinctiveness of settlements or landscape in the plan area.</p>
The West Northamptonshire Area	12	5	<p>The respondent supports the focus for learning in the area and suggests that reference is made to growth in jobs from the higher education sector.</p> <p>The respondent comments that paragraph 4.11 does not sufficiently mention the significance of a growing elderly population and further statistical information needs to be provided in the JCS. The respondent further considers the SHMA is inadequate and there is an insufficient evidence base on older persons housing needs over the plan period.</p> <p>The respondent considers that paragraph 4.13 contains technical errors in relation to named companies for example, Avon has left Northampton.</p> <p>The respondent considers that paragraph 4.14 should be interpreted that Daventry town should include contingencies for development thereby learning the lessons of the past where growth that was anticipated did not take place.</p>
Jobs	13	5	<p>Respondents consider that the JCS does not have a strategy for accommodating jobs growth in the event in an upturn in the economy and a quick response needs to be accommodated by</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>headroom in the allocation of employment land. In addition the respondents consider that high level of demand for B8 is not recognised or accommodated within the employment strategy</p> <p>Respondents consider more information is required on jobs provision for Daventry town and the plan lacks clarity. Housing growth at Daventry may be unsound without supporting jobs growth.</p>
Homes	14	2	<p>The respondent comments that paragraph 4.23 refers to 'specific neighbourhoods in Northampton and Daventry being in need of housing improvement', however it is not clear if this is the same as the four deprived neighbourhoods referred to in the Regenerating and Developing Communities section and suggests this needs clarification in the plan. The respondent comments that housing improvement implies physical regeneration whereas community regeneration suggests developing the capacity and skills of the local residents as such the respondent considers clarity is needed in the plan on what is being proposed.</p> <p>The respondent considers that paragraph 4.25 does not sufficiently address rural housing and under occupation particularly in respect of older persons housing. The respondent further considers there is no supporting evidence base on this aspect and the plan is unsound in respect of rural housing provision and elderly persons housing needs.</p>
Movement	15	4	<p>The respondent considers that paragraph 4.27 should refer to Daventry Town and not the District to ensure the town has a sustainable 'homes to jobs' balance. In addition the respondent considers that the wording implies 52% of Daventry District's residents commute to Northampton whereas there are many other destinations for out commuting and the plan should be clearer in what is meant.</p> <p>The respondent considers that the figures in paragraph 4.28 are estimates and are not accurate. The respondent comments that low public transport usage is a reflection of the lack of facilities.</p>
Community Regeneration	15	1	<p>The respondent considers there is a lack of clarity on what is meant by 'Regeneration' and questions whether this is the physical regeneration of the housing fabric, developing social capital of the local community, or holistic neighbourhood regeneration. The respondent considers the plan needs to be clearer on what the intent of the proposal is.</p> <p>The respondent considers that paragraph 4.31 rightly refers to the pockets of deprivation in rural areas, however the respondent considers this should be picked up again in the</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			Regenerating and Developing Communities section (which deals entirely with urban areas) and also more fully in the Rural Area section (i.e. the last bullet point in paragraph 16.5) and this omission needs to be addressed in the plan.
Town Centres	15	1	The respondent considers that the paragraph 4.35 should include the words "and out of town retail and leisure destinations" after the words "...Rugby and Banbury" as they believe both are important both practically and in terms of policy perspective.
Sport and Leisure	16	0	No Representations Received
Future Opportunities	17	0	No Representations Received
Climate Change	17	1	The respondent considers that as paragraph 4.44 introduces the reader to SUEs for the first time a definition of an SUE within the text would be useful. Respondents support the wording of the paragraph.
Infrastructure and Development	17	2	Respondents support the wording of the paragraph that requires the provision of necessary infrastructure to be provided in a timely manner. However, a respondent objects to this wording and considers infrastructure is required to come first.
Connections	18	2	The respondent considered paragraph 4.48 should give a description of how Dallington Grange and Whitehills development will access the town given congestion on the A5199 and A508 and the Bants Lane/ Cock Hotel junction. The respondent considers the provision of new bus lanes is not practicable given the layout and general condition of these roads. The respondent considers the plan should make specific reference to rural transport problems and how the lack of public transport compounds social and economic deprivation in villages.
Protecting and Building Communities	18	0	No Representations Received
Supporting Town Centres	18	0	No Representations Received
The Economy	18	0	No Representations Received
Educational Attainment	19	1	The respondent gives support to reference to the growth of the student population, but feel it is a little underplayed. The respondent considers reference to the anticipated high growth in student numbers should be further expanded upon within paragraphs 4.55 and 4.56.
Housing	19	0	No Representations Received

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Green Infrastructure	19	1	<p>The respondent considers that the term 'Green Infrastructure' is planning jargon and should be explained in the text. The respondent also considers that the JCS currently separates out open space (as covered in paragraphs 7.34 to 7.43) from other forms of green infrastructure (as covered in paragraphs 10.8 to 10.12), whereas the glossary suggests that open space is part of green infrastructure. The respondent considers that this is inconsistent and needs to be resolved in the text.</p>
Design	19	1	<p>The respondent considers the JCS is inconsistent in its aims in that whilst the historic character and cultural heritage are stressed in 4.59 and 4.60 as important planning considerations, its proposed planning policies will result in Boughton Village undoubtedly suffering from increased traffic as a result of SUE development which the respondent believes will substantially damage the village.</p>
Spatial Vision	20	16	<p>Respondents support the vision.</p> <p>Respondents support the vision but consider that the policies will not deliver the vision, in particular by the reduction of housing growth from RSS requirement. Respondents consider the allocation of sites in sustainable villages should be used to make up the shortfall of housing numbers against the RSS requirement including expansion of Silverstone village.</p> <p>Respondents consider reference needs to be made to the economic down turn within the vision.</p> <p>The respondent considers that the JCS does not explore the public safety issues available to it, for example, there is no mention of 'safety & security' within the vision.</p> <p>The respondent considers the overall vision should include a reference to sport/community needs, and a policy should be included which protects open spaces and facilities.</p> <p>The respondent considers villages should offer a range of housing, not just affordable housing, as stated in the vision.</p> <p>The respondents consider the vision needs to address rural housing needs. Respondents consider evidence base studies on rural housing are absent. The respondent believes there is insufficient older persons housing in Daventry District and feels that the lack of an up to date</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>and effective planning policy for Daventry has hindered the provision of housing, such that the district now has an acute under-supply of housing land.</p> <p>The respondent considers that Northampton has a legacy of vast areas of existing inferior 20th century offices and retail parks and as the strategy does not propose bulldozing this, the vision cannot be realised. The respondent considers there should be a definition of what an "outstanding" public realm or a 'vital village' is. The respondent considers that without these definitions the phrases are meaningless and add nothing to the vision and cannot be measured on their accuracy or truthfulness.</p> <p>The respondent considers it is not clear from the vision whether Daventry is considered to have already achieved a sub regional status or whether it is to grow into this role. The respondent considers the vision and objectives are not ambitious enough for Daventry's growth and the Core Strategy is not effective as a result. The respondent believes there is no clear vision on how Daventry is to grow and what the final objective is. The respondent considers the vision should be redrafted to explain more fully that development needs to take place to secure the objectives for the town.</p> <p>The respondent considers that the vision lacks aspiration to reduce the economic deficit and infrastructure deficit, enhance Northampton Town Centre, create employment opportunities, enhance healthcare provision, and generally improve the wellbeing of the West Northamptonshire population. The respondent believes that if the JCS was adopted it would add to the deficits and not in any way reduce them, as in its present format it is undeliverable.</p>
Spatial Objectives	21	8	<p>Respondents support the objectives.</p> <p>The respondent supports the promotion of sustainable development in order to meet the growth needs of the area and in particular supports the recognition in the JCS of the need for growth and development to support Brackley and assist in the creation of a self-sufficient sustainable town.</p> <p>The respondent considers it would be helpful if the JCS clarified that this list of 15 numbered objectives is not in any order of priority or weighting in planning decisions.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>The respondent considers that whilst there is reference to 'heritage' in Objective 15 the contribution that the historic environment makes to the plan should be recognised as being wider than just design. In respondent feels that in view of the amount of change proposed in the plan there should be a specific objective relating to the protection and enhancement of the natural and historic environment, against which the other policies can be assessed.</p> <p>The respondent considers that the protection and enhancement of the historic environment merits greater inclusion in the objectives as a strategic issue within the context of major development that the JCS addresses. In this regard the respondent refers to the relationship between development at Silverstone and the protection of the significant heritage assets at Stowe.</p> <p>The respondent considered an additional objective to direct retail to appropriate locations should be included.</p>
Objective 1 Climate Change	21	0	No Representations Received
Objective 2 Infrastructure and Development	22	0	No Representations Received
Objective 3 Connections	22	0	No Representations Received
Objective 4 Protecting and Building Urban Communities	22	0	No Representations Received
Objective 5 Supporting Northampton Town centre	22	1	The respondent supports the Town Centre focus as set out in the JCS.
Objective 6 Supporting Daventry Town Centre	22	0	No Representations Received

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Objective 7 Supporting Towcester and Brackley 's Town Centre	22	0	No Representations Received
Objective 8 Economic Advantage	22	1	The respondent supports the objective but believes it cannot be delivered by the JCS polices as the job target has been lowered and in the respondents view the JCS has adopted a strategy of economic restraint.
Objective 9 Specialist Business Development	22	1	The respondent supports the objective but believes it cannot be delivered by the JCS polices as the job target has been lowered and in the respondents view the JCS has adopted a strategy of economic restraint.
Objective 10 Educational Attainment	22	1	The respondent supports the objective.
Objective 11 Housing	23	4	The respondent suggests the wording of this objective should be altered to 'appropriate development in the rural areas'. The respondent considers a reduced rural housing target will not meet the needs of local residents. The respondent believes less additional housing in rural areas will have a detrimental impact on the delivery of affordable housing and will provide less support to facilities and services in villages.
Objective 12 Protecting and Supporting Rural Communities	23	0	No Representations Received
Objective 13 Rural Diversification and Employment	23	0	No Representations Received
Objective 14 Green Infrastructure	23	0	No Representations Received

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Objective15 High Quality Design	24	1	The respondent considers that the JCS does not maximise opportunities to explore the public safety issues available to it. The respondent considers there is no mention of 'safety & security' in any of the objectives.

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 5 - Spatial Strategy and Key Diagram

Policy/ Section	Page No.	No. of Reps.	Summary of the Main Issues Raised by the Representations
Introduction	24	13	<p>A number of respondents express support the overall strategy set out within the JCS.</p> <p>Other respondents have made representations against the introduction which express objections to the overall strategy on the following grounds:</p> <ul style="list-style-type: none"> • What they consider to be a fundamental and significant departure from the earlier Emergent Joint Core Strategy has not been justified by robust evidence and has not been subject to effective community involvement. As a result it is argued that the Pre-submission JCS should be withdrawn and reconsidered; • That the strategy fails to address the economic and infrastructure deficit and misses significant opportunities to develop brown field sites, and • That the development of the JCS has not taken into account key considerations relating to demographic, physical, geographical and technological factors and the importance of personal choice. As such the strategy and its approach to issues such as transport and retail provision is unsound. <p>One respondent makes specific comments regarding the impact which they consider the strategy will have on the strategic road network, specifically:</p> <ul style="list-style-type: none"> • A45 through Northampton; • A45 Daventry – Northampton including the A45/ A5 junction; and • A43
The Key Diagram	24	0	No Representations received.
Hierarchy of Places	24	5	<p>One respondent expresses need for the recognition of the role of villages in providing services and facilities.</p> <p>One respondent is unclear whether Daventry is already considered to be a sub-regional centre. In the respondent's view this status has not yet been achieved so the hierarchy in the JCS should</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>seek to 'develop Daventry into a sub-regional town'.</p> <p>One respondent considers that the JCS only defines a partial hierarchy which renders it incomplete and unsound.</p> <p>One respondent considers that reference could be made to the need for Northampton as the 'Principal Urban Area' to extend beyond the existing borough boundary.</p>
Development in the Towns and Adjoining the Towns	25	1	The respondent considers that the recognition that piecemeal development is more difficult to provide and plan for in terms of the provision of utilities infrastructure, is helpful.
Making the Best Use of Previously-Developed Land and the Vacant and Under-Used Buildings	26	3	<p>Respondents support the objective of re-using previously developed land, but want the essential role of greenfield land in delivering the growth agenda to be acknowledged.</p> <p>One respondent considers that reference could be made to the Northamptonshire Brownfield Land Action Plan.</p>
Development in the Rural Areas	26	5	<p>Respondents consider that:</p> <ul style="list-style-type: none"> • The need for development in the rural area should not be qualified by the word 'limited'; • The Joint Core Strategy does not provide a hierarchy and as such the statement in Paragraph 5.14 is incorrect; • There are no clear spatial rural choices in the plan.
Policy S1: The Distribution of Development	27	91	<p>Respondents express concern about the potential coalescence arising from the expansion of Northampton. A local policy is proposed to specify minimum distances between existing settlements and any urban extension. It is suggested that this would strengthen Policy S1 Part D.</p> <p>Representations focus principally on two key issues i.e. the policy's approach to the rural areas and the use of previously developed land (PDL or brownfield land)</p> <p>In respect of the rural areas respondents seek greater recognition for the role of smaller settlements, beyond the rural service centres, and the contribution they can make towards</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>delivering growth targets. The following additional criteria are proposed for inclusion in part D of the policy:</p> <ul style="list-style-type: none"> • The need to achieve a sustainable balance between jobs and homes; • Development which supports the retention and or provision of services in rural areas; and • To provide a wider range of housing and other development opportunities in the rural area. <p>The criteria referring to the 'quality of tranquillity' is difficult to interpret and the reliance on the CPRE's 'Tranquillity Map' is questioned.</p> <p>In respect of PDL respondents are seeking either a reduction in or removal of the 30% PDL target for the following reasons:</p> <ul style="list-style-type: none"> • Lack of evidence to justify the target; • Concern that the target overestimates the amount PDL as the target predates the changes to the definition of PDL in PPS3; • Concern that the target will be used to restrict the delivery of development; and • The differences between the three local authority areas are such that targets should be specified for each area. <p>Conversely other representations are seeking to place greater emphasis on the use of PDL and consider that the capacity of the urban areas has been underestimated. A consistent view expressed in these responses is the principle of using PDL before any development is permitted on greenfield land.</p> <p>Respondents support the policy but are concerned that restrictive policies elsewhere in the JCS will frustrate delivery of development.</p> <p>Respondents express concern regarding the status of Daventry as a 'sub-regional centre'. One representation questions the ability of the town to meet this role and whether the market can sustain the growth required. Another is seeking a clear statement that the level of development in Daventry will be commensurate with the objective that the town becomes a sub regional centre.</p>
Policy S2: Hierarchy of	29	19	Representations largely from major retailers request that the plan should be flexible to deal with changing circumstances as PPS4 requires. Local centres should be reconsidered and reference

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Centres			<p>to local centres in SUEs should be deleted. There is a request for Sixfields and Mereway to be identified in the hierarchy of centres as district centres and for district centre provision for Duston/ Upton area to be included.</p> <p>Respondents support the overall policy approach but seek greater emphasis on limiting out of town retailing.</p>
The Amount of Housing Required	29	16	<p>Respondents are challenging the overall housing requirement on the following grounds:</p> <ul style="list-style-type: none"> • Does not conform with the RSS; • Will not provide for housing needs; • Housing requirements should be based on sound evidence rather than being reduced on the basis of an economic slowdown. The downturn in building rates is, in part, due to an outdated planning policy base and a lack of local authority commitment to address the problem; and • Concern that the requirement is still too high having regard to the demise of the RSS, uncertainty regarding population, and the ability to provide supporting infrastructure. <p>Respondents consider that the JCS fails to plan for 15 years housing supply from adoption and is therefore in conflict with PPS3. Given the level of growth and infrastructure provision the plan period should be extended to 2031.</p>
Policy S3: Scale and Distribution of Housing Development	32	92	<p>This policy has attracted a number of substantial representations, principally from the development industry, many of which are lengthy and technical in nature. The main focus of these representations is the reduction of the housing requirement to 50,150 dwellings from 2001 – 2026. For ease of reference the key issues raised in these representations are summarised under the following headings:</p> <ul style="list-style-type: none"> • Legal Compliance; • Justification for the Policy; • Effectiveness of the Policy; and • Consistency with national policy <p>Legal Compliance</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>It is argued that the JCS is not legally compliant on the grounds that it fails to have regard to national policy and does not conform generally with the Regional Spatial Strategy (RSS) i.e. the East Midlands Regional Plan. Much reference is made to the Cala Homes case and its consideration by the courts and the conclusion that the RSS remains part of the development plan.</p> <p>Justification for the Policy</p> <p>Respondents criticise the robustness of the evidence base and the lack of justification for a reduction in the housing requirement. The key arguments are summarised below:</p> <ul style="list-style-type: none"> • The reduction in the housing requirement is not based on robust evidence; • Concern that evidence was produced after the decision to reduce the housing requirement had been taken in October 2010; • The Strategic Housing Market Assessment (SHMA) is inadequate and does not provide an independent assessment of need. The SHMA update has been revised to 'fit' the target, whereas it should be informing the target; • There is no evidence that the needs and demands for housing are less than those identified through the RSS; • The decline in housing provision is not a reflection of a lack of need or demand for housing in the area; • The assumptions made regarding building rates are challenged as being unfounded and overly pessimistic. It is argued that there is considerable potential for growth, but the JCS has not considered growth options above 50,000 dwellings; • It is argued that low building rates have not been caused simply by the recession, but also by the delays in the preparation of a strategic planning framework for the area, which has restricted land supply and housing provision even in strong market conditions; • The demographic forecasting is criticised e.g. the assumptions about migration and the failure to use 2008 based projections which show an increase of 10,000 in the number of households to be accommodated in the area; • ONS projections would justify a higher provision than the RSS; • The RSS is based on robust and credible evidence, tested through consultation and

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>examination. No compelling evidence has been provided which justifies departing from its provisions;</p> <ul style="list-style-type: none"> • It is unclear whether the scale and distribution of development has been informed by the analysis of the capacity of individual settlements; • There is no justification for the split in provision between the urban and rural areas. A number of representations claim that the provision in the rural areas is too low especially in Daventry District; • There is potential to increase the level of development in rural areas and therefore increase the overall target; and • A range of alternative dwellings targets are proposed from reinstating the RSS target of 62,125 up to 72,000. <p>Effectiveness of the Policy</p> <p>Respondents focus on the implications of the policy and the reduction in the housing requirement as follows:</p> <ul style="list-style-type: none"> • Insufficient homes will be provided for the population; • The impact on adjoining areas has not been considered; • Constraining supply will exacerbate problems regarding access to decent housing and the affordability of housing; • The negative impact on the economy, e.g. the reduced housing target has led to a reduction in the targets for jobs; • The needs and demands for housing will not be met; • The provision in rural areas is too low to meet the needs of the villages; • When provision within the NRDA is taken out the requirement for Daventry District is 40% lower than the RSS; and • The housing requirement for Daventry District is not deliverable or flexible. There should either be no split between the urban and rural area, or if the split remains the rural requirement should be higher. <p>The need for greater flexibility is raised, particularly the need for contingencies, should one or more of the SUEs not be delivered, as anticipated by the JCS. It should be clearly stated that the</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>figures are 'minima'.</p> <p>Consistency with national policy</p> <p>Respondents claim that the policy is not consistent with national policy, particularly PPS3 and PPS12 for the following reasons:</p> <ul style="list-style-type: none"> • Housing provision is not based on an assessment of the need and demand for housing as required by PPS3; • The failure to plan for growth is inconsistent with the national objective to increase housing supply and promote sustainable development. It is argued that the JCS should adopt a long term, flexible approach and plan for improvements in the economic position; and • The JCS will not make provision for housing for 15 years following adoption. The plan period should therefore be extended beyond 2026. <p>Whilst the majority of representations have come from the development industry, there have also been representations from local residents and community groups raising the following issues:</p> <ul style="list-style-type: none"> • Concern that there was no consultation on revised figures; • Concern that the number of houses is still too high; • Concern that the delivery of even the reduced requirement will be challenging in the light of the need to fund and deliver infrastructure; and • A specific request for a reduction in the supply figure for South Northamptonshire to enable a reduction in the scale of growth planned at Towcester.
Policy S4: Northampton Related Development Area	33	159	<p>120 of responses to the NRDA policy were received in the form of a standard representation from local residents seeking the following:</p> <ul style="list-style-type: none"> • Restriction of the expansion of the Pineham employment area; • Assurance that the Junction 16 Warehouse Park will not be resurrected; and • A new policy to protect the countryside gap between Northampton and Kislingbury.

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>The key issues raised in other representations include:</p> <ul style="list-style-type: none"> • Concerns regarding the impact of development in the NRDA on the surrounding rural area, particularly the potential for coalescence, the lack of infrastructure, and traffic impact. The need for a specific policy to reduce the risk of coalescence with villages is raised; • The housing requirement within the NRDA should be increased to the level specified in the RSS for the Northampton Implementation Area; • The housing requirement should be expressed as minima; • The NRDA should not be defined on an OS base as this is too prescriptive and inflexible. • There are no contingencies within the policy to enable additional land to be brought forward should any of the SUEs be delayed; • Land to the east of Wootton previously identified as the Wootton Strategic Development Area (SDA) proposal should be included in the NRDA. • Greater flexibility is needed to enable the development of smaller sites on the edge of Northampton to meet higher growth target. Flexibility should also be provided to enable development beyond the boundary if the yield from urban sites is lower than expected; and • The selection of SUEs within the NRDA has not been justified. A technical paper should be produced to explain how options have been evaluated.
Policy S5: Sustainable Urban Extensions	34	43	<p>This policy lists the SUEs which are allocated in the JCS. Respondents are seeking changes which fall into the following categories:</p> <ul style="list-style-type: none"> • Representations seeking the deletion of one or more of the SUES; • Representations seeking the inclusion of additional / alternative SUEs; and • Representations seeking amendments to the existing SUEs specified in the policy. <p>The deletion of the following SUEs is sought:</p> <ul style="list-style-type: none"> • Northampton West; • Northampton South; and • Brackley North (excluding the 'Sawmills' element of the site) <p>The inclusion of the following additional or alternative SUEs is sought:</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<ul style="list-style-type: none"> • Land south of the M1 – known as ‘Northampton Highgate’; • Daventry South SUE – 2200 dwellings by 2026 and 3300 dwellings in total; • Land east of Wootton should be identified as a ‘direction of growth’ to provide greater flexibility; • Northampton South East – should be partly allocated with the balance of the growth area identified as a ‘broad location for growth’; and • M1 Junction 16 (Midway Park) – is a suitable employment site that should be included in the policy for B2 and B1 strategic employment. <p>The following amendments are sought to the existing SUEs listed in the policy:</p> <ul style="list-style-type: none"> • Daventry North East - the policy should reflect the total allocation of 4000 dwellings to avoid arbitrary phasing; • Northampton West – additional land should be included to increase the capacity from 1500 dwellings to 5400; • Towcester South – should not be limited to 1500 dwellings and 1500 jobs. The policy should specify development up to the full allocation and refer to a site area for employment land rather than job numbers; • Brackley East – should be developed in advance of Brackley North; • Northampton South of Brackmills – two separate extensions to the SUE are sought; • Northampton Kings Heath – the dwelling yield should be ‘up to a maximum’ in the range of 2950-3000; and • Northampton North – should be extended to incorporate provision from the Northampton West and South SUEs which should be deleted. <p>Other key issues raised by respondents:</p> <ul style="list-style-type: none"> • There is no evidence that the SUEs listed for Northampton can accommodate the housing targets set out in Policy S3; • Policy should reflect the committed site at Monksmoor Farm, Daventry; • Site specific allocation of SUEs in the JCS is inappropriate as the evidence base is insufficient, the allocations lack detail, and there are unresolved issues relating to viability and delivery. It is also argued that the SUEs, taken individually, are not fundamental to the delivery of the JCS and as such do not meet the requirements for strategic allocations

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			<p>specified in national policy.</p> <ul style="list-style-type: none"> • There is no evidence that the employment provision specified in the SUEs will come forward: and • The reference to 'local employment opportunities' in each of the SUEs is unclear and does not specify the level at which it should be provided. <p>One respondent considers that the policy should specify that some of the SUEs, such as Northampton – North of Whitehills, are allocated in existing 'saved' plans.</p>
Policy S6: Phasing of Housing Development	35	25	<p>Representations from the development industry claim that the policy provides unreasonable constraints on the rate of development as follows:</p> <ul style="list-style-type: none"> • It is argued that if infrastructure is provided then there should be no phasing limitations. Therefore achievement of completions above the phased targets should be allowed; • The approach pushes back development beyond 2016 which fails to address the ongoing need for housing across the area. Additional growth could be achieved by bringing forward the delivery of Northampton North; and • The policy should provide a set of criteria to enable greenfield sites to be brought forward based on para 69 of PPS3. <p>Respondents consider that the absence of a SHLAA assessment makes the phasing policy meaningless and unsound.</p> <p>Respondents argue that statements in the supporting text regarding the completion of infrastructure and provision of local employment should be included within the policy. Growth targets explicitly linked to local employment growth and infrastructure targets would provide a stronger policy statement.</p> <p>Respondents claim that the projections seem to ignore the findings of the Daventry appeals and the constraint that applies to further development until a Flore-Weedon bypass is provided. SUEs in Daventry will not be able to deliver significant housing before 2017 at the earliest.</p> <p>One respondent considers that trajectories should be provided for each local authority area and include the split between housing provided within the NRDA and that which meets the local</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>requirement.</p> <p>Respondents consider consequential changes may be needed arising from representations on Policy S5, in respect of Northampton – Kings Heath SUE and Towcester South SUE.</p>
Policy S7: Provision of Jobs	37	19	<p>Respondents express concern that the jobs figure is so far removed from the RSS figure as to be out of general conformity</p> <p>Respondents request a significantly higher jobs figure to stimulate/achieve investment. They consider the lower figure will not achieve the vision or objectives for West Northamptonshire and new sites are required to respond to the demand for B8.(e.g. Brackmills Point) and demand for strategic office development that cannot be accommodated in the Northampton central area.</p> <p>Respondents advise that it should be made clearer in the JCS that the skills and job targets are minima and that additional employment beyond this figure will be welcomed provided the local impacts, with mitigation, are acceptable and that the workforce will gain access by sustainable means. They also feel that it would be helpful to reference the 16,000 figure against the current level of jobs in West Northamptonshire i.e. the JCS could state what the base figure at 2010 is and/ or say what the percentage increase is if there are 16,000 additional jobs.</p> <p>Respondents the reduced jobs target as this may help to stimulate growth in Wellingborough and reduce out commuting and that housing growth must be linked to local jobs growth</p> <p>Respondents consider that the jobs contribution made by the expansion of the Higher and Further Education sectors should be better recognised in the plan.</p>
Policy S8: Distribution of Jobs	38	30	<p>Representations to the policy from the development industry comment that the sites identified in the plan are not sufficient or attractive to the market to deliver jobs growth. Furthermore they consider that the plan does not embrace the value of the warehouse and distribution sector to the local and regional economy and the renewal of sites will not meet the needs of the warehouse and distributions sector. Consequential changes to the policy are sought as follows :-</p> <ul style="list-style-type: none"> • Reference to a strategic employment site at Houghton Gate and a new policy inserted referring to the delivery of this development;

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			<ul style="list-style-type: none"> • Flexibility to deliver sustainable rail freight other than DIRFT 3; • Allocation of Brackmills Point for warehouse development; • Delete reference to Policy E1 as this does not refer to regeneration or renewal; • Rural employment should be referred to in Daventry section; and • Include an additional bullet point for Silverstone Circuit to state 'and further employment, tourism, education and leisure development'. <p>Respondents are seeking clarification on the following:</p> <ul style="list-style-type: none"> • What is meant by 'local' employment?; • Additional text required to refer to office and retail employment provision in Towcester as set out in Policy T2; and • What is meant by town centre, central area and principal urban area? <p>Respondents offer support for the deletion of the employment area at Junction 16 and to the inclusion of additional safeguards in Policy E3 to prevent diversion of investment from the central area</p> <p>Respondents express concern that the plan assumes policy will emerge from Daventry Master Plan which is still under public consultation.</p>
Jobs Growth by Sector	39	5	<p>The responses largely replicate those submitted against policies above relating to:</p> <ul style="list-style-type: none"> • The need for reference to a Strategic Employment Site on land north of the A428 Bedford Road and east of The Lakes (Houghton Gate); and • Greater reference to be made to the importance of the Higher and Further Education sectors in the growth of the non Class B jobs sector. <p>General comments raised by respondents refer to the loss of retail jobs due to internet shopping and the need for superfast broadband and a JCS policy to address this.</p>
Policy S9: Distribution of Retail	43	23	<p>Responses from major retailers raise the following issues:</p> <ul style="list-style-type: none"> • Restricting proposals for retail development to the newly designated local centres only, fails to take account of need within existing areas;

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Development			<ul style="list-style-type: none"> • Policies should be made sufficiently flexible to allow for new and the intensification of existing retail development that is well located to established built up housing areas, to help meet local needs and to provide access to such facilities by means of transport other than the car. • A single redevelopment scheme (Grosvenor Centre) is being relied upon to deliver the vast majority of the comparison goods requirement, which may not begin to deliver until towards the end of the plan period, and therefore the gap between the retail offers of Milton Keynes and Northampton could become exacerbated, to the detriment of Northampton as a whole. A flexible approach to allowing for appropriate out-of-town comparison goods floorspace to be delivered throughout the plan period must be incorporated. • The effective moratorium on 'out of centre' retail development without the opportunity to consider the relative merits of proposals is counterproductive, and directly contradicts the emphasis on sustainable economic growth within Planning Policy Statement 4 (PPS4). • Reference to 'need' should be removed as this is not consistent with PPS4 which considers impact on the shopping hierarchy. • Replace 'central area' for 'town centre' in Paragraph 5.61. <p>Respondents comment that Policy S9 and its supporting text should be amended to ensure that proposals for out-of-centre development will not have an adverse impact on the vitality and viability of Wellingborough town centre.</p> <p>Respondents express support for Policy S9 but consider that local authorities will need robust advice to counter claims of no adverse effect on town centres from retailers.</p> <p>Respondents consider that banks are important contributors to town centres and as such A2 uses should not be restricted.</p>
Policy S10: Sustainable Development Principles	47	39	<p>Respondents to policy S10 raise concerns about requiring new development to generate a minimum of 10 % of energy needs from renewable or decentralised low carbon sources and to comply with stipulated Code for Sustainable Homes (CSH) standards. The concerns are as follows:</p> <ul style="list-style-type: none"> • The omission of a minimum threshold for compliance in terms of the scale/ size of development;

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			<ul style="list-style-type: none"> • Its overall inflexibility and inability to be assessed for compliance; and • The lack of evidence to justify the viability of this requirement is contrary to national policy. <p>Respondents express the following concerns in relation to the stipulated Code for Sustainable Homes (CSH) standards:</p> <ul style="list-style-type: none"> • The timing of CSH compliance renders this requirement obsolete; • Imposing this requirement will need to unnecessary duplication of national standards and place a heavy burden on developers; • Compliance with the Building Standards and other national initiatives is preferred to locally imposed standards; and • No evidence has been produced to justify the stipulated CSH levels. Compliance with this requirement that exceeds the minimum statutory Building Regulations standards will threaten the viability of housing delivery and will reduce affordability.
Policy S11: Renewable Energy	48	8	<p>Most representations recommend minor amendments to the wording of the policy.</p> <p>Respondents question the validity and soundness of the policy. One respondent argues that it is unclear as to what local perspective this policy adds that is specific to West Northamptonshire as it simply repeats national policy. Additionally, they consider that paragraphs 5.80 - 5.82 of the preamble do not provide sufficient information to justify the policy.</p> <p>Another respondent submits that the policy fails to provide a positive framework for renewable energy development, as required by PPS22 and the PPS1 supplement. Furthermore, they submit that three of the four bullet-point criteria of Policy S11 are either ineffective development management policies, or are in conflict with national policy.</p>

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Section 6 - Connections

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Chapter 6: Introduction	50	12	<p>The respondent considers that the Joint Core Strategy does not provide any clear indication of the relationship between the Northern Relief Road, including the Sandy Lane Relief Road as a temporary solution to the needs of the area and the later proposed alternative provision of a North West Bypass for the town.</p> <p>Respondents express concern that air quality will deteriorate further under the proposal to use the A508 to link traffic moving along the proposed Northern Relief Road to the Holly Lodge Road turning.</p> <p>The respondent questions how transport issues in developments will be enforced, monitored or addressed once they are built?</p> <p>The respondent questions the soundness of the North West Bypass proposal on the basis that it has been put forward without any proper consideration of its potential negative environmental impacts and has not been adequately addressed in the Sustainability Appraisal.</p>
Policy C1: Changing Behaviour and Achieving Modal Shift	54	23	<p>The modal shift targets are a key focus of these representations with the following issues being raised:</p> <ul style="list-style-type: none"> • Object to modal shift targets for all new developments which seek to achieve no more than 40% of trips made by the car; • Targets should not be absolute/ minimum targets, but should be treated as aspirational targets. A flexible approach is required; • Targets are impossible to achieve in rural areas; • Need to clarify timescales for the modal shift targets; • Modal Shift Targets should be set out in the policy; • Only way a 20% shift could be achieved is if a developer provides extra contributions. This would place a considerable cost burden on development sites which already subject to

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>many planning obligations such as the provision of affordable housing; and</p> <ul style="list-style-type: none"> • To achieve targets it will be necessary for growth to be located in rural areas. For example the significant development at Silverstone Circuit should have housing to support it, yet JCS policies limit the housing growth in larger villages like Silverstone. <p>Respondents express concern that public transport schemes are unfeasible given recent reduction in public transport funding and do not appear to be factored into infrastructure costs.</p> <p>Respondents express concern that a bypass at Towcester Sustainable Urban Extension will encourage motorists to bypass Towcester.</p>
Policy C2: New Developments	55	26	<p>Four of the representations focus on the effectiveness of the policy as follows:</p> <ul style="list-style-type: none"> • Proposed transport schemes are impractical given recent reduction in bus services; • It is expensive for developers to provide transport infrastructure to reduce car use. Modal Shift will take time to deliver and cars will be used until completion of the public transport infrastructure; • The policy fails to tackle safety in any way; and • The policy should refer to the numeric modal shift targets specified in the supporting text. <p>The respondents challenge the justification for a number of the policy requirements as follows:</p> <ul style="list-style-type: none"> • It is unclear why there is a need for a Travel Plan Supplementary Planning Document for the production of travel plans as there is already national policy guidance on this matter; • It is unreasonable to expect small scale developments to accord with this policy; • The expectation that Sustainable Urban Extensions should ensure that new or enhanced public transport services are secured on occupation of the first dwelling in unreasonable and does not have regard to the level of existing services which may already be available and their potential adequacy; • Service providers require a critical mass before significant new services are provided. There is therefore a need, the respondent feels, to recognise the differing/ lower availability of existing public transport services in the market towns than exists in Northampton; • The developer cannot be penalised for its efforts to achieve modal shift targets if they

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			<p>ultimately fail, particularly where the spending choices are made by the local authority; and</p> <ul style="list-style-type: none"> • Provision of enhanced public transport facilities will be reliant on the needs and requirements of operators not, solely, developers. <p>The respondent makes specific comments in respect of the Grosvenor Centre and the need to continue to provide for cars within the development through a wording change to the policy.</p> <p>The respondent highlights problems they feel relate to the phasing of the Brackley Sustainable Urban Extensions and the need for linkages to be provided. It is argued that the Eastern Sustainable Urban Extension has a crucial role to play in providing the routes and should be built before the Northern Sustainable Urban Extension as the Northern Sustainable Urban Extensions relies heavily on routes provided by the Eastern Sustainable Urban Extensions.</p>
Policy C3: Strategic Connections	57	16	<p>Respondents propose the following amendments/ additions to the initiatives listed in the policy:</p> <ul style="list-style-type: none"> • Could include reference to provision of park and ride facilities to compliment Sustainable Urban Extensions where required. e.g. Northampton North? • It would be logical to recognise that A43 junction modifications and road improvements also include the A5 to A43 bypass at Towcester; • The Northampton Growth Management Strategy should be referred to under the "Road" heading, as the scheme is well developed and is intended to be mainly delivered through developer contributions; • The policy wording relating to Water Strategic Connections is very unspecific and could be made more meaningful through references to provision of interchange facilities, enhanced water supply and channel dimensions; and • Amend bullet to read "Implementation of an Inter-Urban Coach service to connect to the Midland Mainline and improved journey times/ connections to access the East Midlands Airport." <p>Respondents' representations focus on the delivery of transport infrastructure and raise the following issues:</p> <ul style="list-style-type: none"> • The Joint Core Strategy should set out how the A45 Improvements are to be funded - what funding streams have been identified/ will be identified, and a timetable for implementation

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			<p>of them and by whom;</p> <ul style="list-style-type: none"> • A new access to Moulton College is required from the A43 to address existing traffic problems; • A respondent is querying whether their £375m Infrastructure funding offer has been given any consideration by the WNJPU; • Concerned that period of the JCS is not sufficiently long to give confidence and certainty to investors in infrastructure and those delivering it; • The IDP has not been able to correctly identify or prioritise key primary infrastructure in terms of its cost, funding and delivery. The Towcester SUE proposal is an example of defining a growth location prior to the adoption of the A5 Bypass; • What measures are being put in place to ensure rail services through Northampton are at a standard to support increase in housing as it is inevitable that many people will be working out of the area and likely to be commuting to London; • More consideration must be given to existing traffic congestion on the M1 in the County; and • It is suggested that further consideration be given to the robustness of the improvements detailed to improve the A43 and deliver the Northampton North SUE as no details are given in the IDP.
Policy C4: Connecting Urban Areas	59	8	<p>Respondents propose the following amendments / additions to the proposals listed in the policy:</p> <ul style="list-style-type: none"> • The policy should refer to improved transport links to DIRFT; • The road between Daventry-Northampton is part A45, part A4500. The policy should therefore read “A45/A4500 Daventry to Northampton”; • Policy N8 identifies need for a park and ride site on A5199, which is not included in the priority network. This appears to be an inconsistency that needs to be addressed; • The reference to A43/ A361 Brackley to Cherwell District requires amendment as A361 does not lead from Brackley to Cherwell district; and • Daventry should be included in the A5 corridor link to Milton Keynes as the town is a big employment draw for people and shoppers. <p>Respondents also seek further clarifications of the following aspects of the policy:</p>

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			<ul style="list-style-type: none"> • The clarity of the policy could be improved as it is not currently evident whether any of the proposed public transport measures are needed to support the JCS or if they are deliverable; • The present the nature of the Arc Transit system is not defined and accordingly the JCS should not assume it will be entirely bus-based; and • More detail on the A45 Northampton to Wellingborough and A43 Northampton to Kettering routes is needed.
Policy C5: Enhancing Local and Neighbourhood Connections	61	9	<p>Respondents' query whether park and ride should be included in the local connections section or whether it would be more appropriate to include it in Policy C4.</p> <p>Respondents consider Daventry should also be included as a park and ride location, with a prospective A45 Park and Ride site serving both Daventry (local) and Northampton (inter-urban).</p> <p>Respondents argue that the Brackley East Sustainable Urban Extension will provide crucial local connections and should be developed in advance of Brackley North.</p>
Policy C6: High Speed Rail 2	62	4	<p>Respondents consider the Joint Core Strategy should take High Speed 2 into account in terms of how the WNJPU propose to engage with the development/ emergence of this project and how allocated sites will be protected against its effects.</p> <p>Respondents consider it is not clear how Policy C6 would be enforced, as the constituent authorities in the WNJPU will be no more than consultees, as acknowledged in the supporting text (Paragraph 6.29).</p> <p>Respondents feel that given the expected "major impact" of HS2 on Brackley, it is surprising Brackley East and Brackley North Sustainable Urban Extension policies do not refer to HS2 in any way. The policies should take account of HS2 and its potential to affect on the two SUEs.</p> <p>Respondents consider that HS2 could harm heritage assets including Edgcote House, and its park, a scheduled monument and the Battle of Edgcote site. This should be acknowledged in the policy.</p> <p>Respondents are concerned at the lack of detail in the information published for consultation and the degree to which this makes the consultation process sound.</p>

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			<p>Respondent considers that Northampton suffers from longer rail journey times and service frequencies compared to other stations served by Inter-City services. It is essential that if HS2 is built that existing rail services should also be improved. Improved journey times/ service frequencies are critical to ensure the area retains its economic competitiveness and this should be outlined in Policy C6 or its pretext.</p>

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Section 7 – Regenerating and Developing Communities

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Introductory Text	63	5	<p>One respondent considers that the Plan fails to grasp the challenge of regeneration opportunities. They feel there are two major omissions from both the Emergent JCS and the Pre-Submission JCS, these being the 44 acres at Northampton General Hospital Site and 75 plus acres at Daventry Marches. The respondent considers that the redevelopment of both of these sites will change the dynamics and inward investment opportunities for Northampton and Daventry 'central areas' and indeed for the 'whole community' of West Northamptonshire and need to be part of a compelling vision for a plan period to 2031.</p> <p>One respondent feels that this section should address rural communities/ deprivation.</p> <p>One respondent reports that Paragraph 7.3 identifies the need for four key attributes to be considered in the need for and delivery of regeneration, relating to: economic, social, physical and environmental. However, the respondent feels that the datasets used to measure deprivation, as listed in Paragraph 7.16, relate only to the first three of these attributes (living standards, crime, housing condition etc). They feel that environmental measures can also be used to determine regeneration priorities. They also point out that a large amount of data on the condition of a wide range of environmental indicators is available that may be used for such assessment.</p> <p>One respondent feels that Paragraph 7.11 refers to further work that may need to be undertaken in DPDs and strategies but that the JCS does not identify who will take this area of work forward, the resources available or what priority there is on this work compared to other work areas identified in the JCS. They feel that the JCS needs to ensure that there is commitment to undertake this work, or alternatively delete reference to it.</p> <p>One respondent suggests a number of minor changes to aid clarity and comprehension including clearer references to social and cultural facilities.</p>
Policy RC1 – Delivering	68	6	<p>One respondent suggests that table 3 intimates that Village Design Statements (VDS) will be important 'local' policy documents. They also wonder whether local councils are committed to</p>

Policy/ Section	Page No.	No. of Reps.	Summary of the Main Issues Raised by the Representations
Community Regeneration			<p>reviewing and helping communities to get VDS complete and adopted? One respondent feels that the role of churches as critical partners, including alongside partners from the Third Sector, should be acknowledged in the JCS. The respondent also considers that the Faith Sector has shown itself to be innovative and with the ability to deliver long term benefits to locals communities.</p> <p>Respondents consider that reference could be added in the JCS to the forthcoming Localism Bill.</p> <p>Some respondents express support for this policy.</p>
Introductory Text	68	5	<p>One respondent considers that it should be acknowledged in the JCS that community needs extend beyond physical infrastructure and buildings.</p> <p>They also consider that the significant contribution made by Churches and most other faith communities as community assets is ignored and that the JCS should include reference to these.</p> <p>One respondent feels that the JCS should set out a clear policy with regard to the suitability of former public and community buildings and commercial buildings located outside residential areas as appropriate locations for places of worship and associated community activities. They feel this, would of course, be subject to such buildings satisfying any requirements set out in policy.</p> <p>One respondent considers that Paragraph 7.26 should list Places of Worship or Religious Buildings as an emboldened bullet point. They also feel that such places are essential for sustaining a mixed use environment.</p> <p>One respondent considers in relation to Page 70 that it is suggested that the sub-heading should refer to 'Public' Open Spaces and Paragraph 7.34 should distinguish between open space and green infrastructure in Paragraphs 10.8-10.12. They feel that It is not clear whether the protection of incidental open space, private gardens, public rights of way, canals etc. are dealt with here or under green infrastructure. They feel that clarity is needed when assessing planning applications that involve the lost of open space.</p>

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			<p>Some respondents consider that it is unclear who will prepare the Developer Contributions Supplementary Planning Document, when, etc referred feel that Paragraphs 7.40 and 7.41 that refer to the Developer Contributions SPD.</p>
Policy RC2: Community Needs	72	15	<p>One respondent considers that it is unclear how the JCS or subsequent DPDs might provide existing cultural facilities any protection from closure, decline or enhancement. They feel that Policy RC2 should have a wider focus to include the protection and enhancement of existing community and cultural facilities to reflect the description of the term 'social infrastructure' or Policy E7 could be expanded to protect existing cultural facilities. They also feel that the description of the term 'social infrastructure' could be deleted and a new entry made in the Glossary for 'community facilities' along the lines of community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. They go onto feel that for consistency, continuity and clarity, sui generis should be included in the Glossary for buildings that are not in any Use Class such as theatres, petrol filling stations, nightclubs and launderettes.</p> <p>Some respondents feel that Policy RC2 does not comply with Community Infrastructure Levy (CIL) Regulation 122. The JCS should properly be a high level strategy document and, as such, it should not rely upon preceding Supplementary Planning Documents which will not have been subject to examination and may pre-date the introduction of the CIL Regulations (6th April 2010) pursuant to what should be the establishment of the overarching principles in the JCS. They also feel that there is a real risk of inappropriately endorsing documents which have not been properly considered in context so that the related policy, in this case Policy RC2, may not be justified, effective or legally sound. They also feel that reference to previous Planning Policy Guidance 17 studies should be deleted.</p> <p>One respondent considers that the strategic allocations identified in the JCS will not necessarily require the preparation of Development Management and Site Allocations Development Plan Documents (DPDs). For example, Policy N5 refers to the Northampton South Sustainable Urban Extension requiring only a master plan rather than any DPD. Accordingly for reasons of clarity and not being the most appropriate strategy, the respondent feels that JCS Policy RC2 should be amended to reflect this approach for the sustainable urban extensions.</p> <p>Respondents feel that the JCS should not explicitly refer to the Planning Policy Guidance Note 17 studies; the West Northamptonshire Sports Facilities Strategy or the Cultural Investment</p>

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			<p>Plan within the policy as these have not have been subject to examination. They feel that their inclusion within Policy RC2 would have the effect of giving these documents development plan status and that this is not justified. They feel reference to previous PPG17 studies, the Sports Facility Strategy and the Cultural Investment Plan from Policy RC2 should be deleted from the JCS.</p> <p>Some respondents feel that regarding policy RC2, the first bullet point referring to replacement of equal quality; They feel of equal importance, they consider, is the location of any such replacement. The loss of a sports pitch within an urban area cannot be adequately replaced by a new facility in the middle of the countryside, especially if it is not accessible by public transport. The respondent suggests that at the end of the first bullet it should say “A replacement facility of equal or better quality and accessibility”.</p> <p>Some respondents express support for the policy.</p>

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Section 8 - Economic Advantage

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Introduction	73	7	<p>The respondents consider that the JCS needs to be more responsive to accommodating the demands of the market. The respondents feels that the lack of supply of large (in excess of 20,000 square metres) floor space opportunities within the area will mean inward investors will not look to the West Northamptonshire area for speculative development, or long term plans. The respondent advises of an option on land in a strategic location, just south of the M1, Junction 15A, which they state is a prime, deliverable site for employment use to meet the demand for space that is strong in the Northamptonshire area and should be allocated as a strategic employment site within the JCS.</p> <p>The respondents consider that the JCS polices do not adequately reflect the economic potential of the area as a key driver for growth and economic prosperity. The respondents believe the JCS appears as a restriction on jobs growth through a reduction of housing targets. The respondents also believe that the disparity between 50,150 homes and 16,000 jobs needs to be clarified within the plan and the evidence base. The respondents point to the Strategic Employment Land Assessment which provides an indicative forecast of a requirement for 68,119 jobs for the 2001- 2026 period based on a TEMPRO trend based model of employment growth rate building on the strong growth rates of previous years.</p> <p>The respondents broadly support the Economic Advantage policies.</p>
Policy E1: Existing Employment Areas	73	19	<p>The respondent considers that although titled 'Existing Employment Areas', the Policy also refers to allocated employment sites and this requires clarification.</p> <p>The respondent questions what the JCS intends by reference to investment of a "scale commensurate with" the function of the town. The respondent considers clarity is required on the word 'commercial' in the policy as the remainder of the policy refers to 'employment' and 'industrial uses'.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>The respondent considers that the JCS is unclear on what is intended for the new employment space at Kings Heath.</p> <p>The respondent objects to reference to 'non-strategic' B8 in Policy E1.</p> <p>The respondent considers that the JCS does not reflect the strategic advantage West Northamptonshire has for distribution. The respondent considers that existing sites are unsuitable for distribution and consequently new sites need to be allocated. In this respect the respondent considers Swan Valley can continue and develop the role of a gateway location to Northampton and a new site such as Junction 16 (Midway Park) should be allocated.</p> <p>The respondent considers that the policy and/ or its explanatory text should acknowledge that the Minerals and Waste Development Framework identifies industrial areas, and in the case of the locations for Waste Development the DPD designates certain industrial areas, within which waste management uses would be acceptable in principle.</p> <p>The respondent considers that the Policy is not consistent with Planning Policy Statement 4 (PPS4) and more flexibility is required within the policy. The respondent considers the policy should be redrafted to focus on strategically important sites and allow a more flexible approach to other, historic 'employment sites'.</p> <p>The respondent considers the policy is unduly onerous particularly where economic viability is not always clear cut, and harmful impact or benefits of redevelopment are subjective. The respondent considers there is no need to prevent the change of use of all employment sites to other uses as is sought by the policy.</p> <p>The respondent considers the policy is contrary to national guidance in Planning Policy Statement 3 (PPS3) which advises LPAs to consider the release of employment sites for housing.</p> <p>The respondent considers the policy runs counter to the proposals by the Government to make</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>it easier to switch from office to housing use. Consequently the respondent considers the first two paragraphs of the policy should be deleted.</p> <p>The respondents consider there is an insufficient of supply of high quality commercial floorspace. The respondents also consider there is a deficit of available unconstrained land across Northampton to meet employment growth in the short term and a severe shortage in the long term. The respondents consider that the JCS offers little to suggest how these sites will be delivered.</p> <p>The respondents support the policy approach.</p>
Policy E2: New Office Floorspace	74	14	<p>The respondents consider the policy is not consistent with Government policy at PPS4 which allows for a sequential approach beyond town centres.</p> <p>The respondent questions what the JCS intends by reference to investment of a “scale commensurate with” the function of the town in respect of new commercial floorspace at Towcester,</p> <p>The respondent comments that if employment is to be viable at Towcester it will be critically important to be able to deliver major office development.</p> <p>The respondent comments that if employment is to be viable at Kings Heath it will be critically important to be able to deliver major office development.</p> <p>The respondent questions the relevance of referring to the need to retain manufacturing jobs in the supporting text of an office development policy.</p> <p>The respondent comments that as Paragraph 8.7 refers to other DPDs there is a need to identify priorities, timescales and resources for each DPD/SPD to avoid raising unfair expectations.</p> <p>Respondents express support for the policy approach.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Policy E3: Technology Realm	75	7	<p>The respondent considers that the policy is overly prescriptive, particularly regarding site size, and scale and the form of units. The respondent considers the policy should be rolled in with policy N3 Northampton North SUE and policy E3 deleted.</p> <p>The respondents consider delivery and timing of the Technology Realm with the SUE delivery is unclear.</p> <p>The respondent welcomes the allocation of a Technology Realm but considers a strategic site of at least 28 hectares (112,000 sq m) linked to an urban extension is required to meet the policy objective.</p> <p>The respondent comments that the range of employment uses specified means that it is unlikely to compete with Northampton central area as the preferred and primary destination for B1, which is to be supported.</p> <p>The respondent considers the Northampton North area is already subject to significant congestion and major road works will be necessary to facilitate the development.</p> <p>The respondent considers that Proposals Map 5 - Inset 10 should show the location of the Technology Realm and the route of the 650mm diameter (2' 2") high pressure gas main.</p>
Policy E4: DIRFT	77	11	<p>Whilst supporting the general thrust of the policy the respondent considers the final sentence of Paragraph 8.14 which reads: 'The floorspace to be provided at DIRFT 2 is counted as part of the 2010 to 2021 supply of warehouse and distribution for the West Northamptonshire area.' should be deleted.</p> <p>The respondent considers any floorspace targets set out for rail-related strategic distribution development in any evidence base should not be regarded as maxima and this should be added to the JCS text. The respondent considers an increased focus on rail freight movement by the retail, logistics and rail industry is likely to increase demand for rail freight interchange development in the plan area, bringing with them significant economic and sustainability advantages.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>The respondent considers additional text should be added to paragraph 8.19 and the policy text should refer specifically to DIRFT III.</p> <p>The respondent considers that the symbol on the diagram representing DIRFT is relocated to reflect the location of DIRFT III (west of the M1 and north of Junction 18) and that a plan is provided as part of the JCS which outlines the location and extent of the DIRFT III site as was agreed at the committee meeting of the Joint Strategic Planning Committee on the 31st January 2011.</p> <p>The respondent considers that paragraph 8.18 should be updated to take account of the DIRFT III proposals and reference should be made in the text and policy to the need to reconcile the proposals with the need to protect the natural and heritage assets in this area.</p> <p>The respondent considers the expansion of DIRFT should be supported. The respondent also considers that given the proximity of DIRFT to the village of Crick there are clearly significant benefits in terms of access to jobs. The respondent, therefore, considers Crick should accommodate additional housing growth. The respondent considers Policy R1 is silent on the availability of jobs when considering the sustainability of settlements and this represents a significant failing in eth JCS and should be addressed</p> <p>The respondent does not object to Policy E4 but considers that DIRFT will provide a limited number of jobs for West Northamptonshire residents due to accessibility. The respondent also considers the site is unattractive and unsuitable for businesses that do not require access to rail facilities, consequently the allocation of other employment sites, such as M1 Junction 16 (Midway Park) will be required to meet the needs of business and to provide job opportunities for the residents of West Northamptonshire.</p> <p>The respondent welcomes the recognition of the importance of DIRFT as an economic driver but considers it should be recognised that it will not have a significant impact on employment levels within West Northamptonshire as it will generate a high level of in-commuting.</p> <p>The respondent considers paragraph 8.19 should acknowledge that any future proposals in</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>and around DIRFT may necessitate cross boundary working with Rugby Borough Council and Warwickshire County Council.</p> <p>The respondent considers that Kilsby and Crick railway station should be reinstated to improve public transport use associated with DIRFT.</p> <p>Respondents express support for the policy approach.</p>
Policy E5: Silverstone Circuit	79	19	<p>The respondent considers cross-boundary impacts, including the setting of heritage assets need to be considered in the policy. The respondent considers the international importance of Stowe Park, in particular, landscape mitigation and archaeological investigations, should be referred to in the policy and accompanying text.</p> <p>The respondent considers that Policy E5 should be amended to indicate that development will take place in accordance with the agreed outcomes of the identified studies and any required mitigation.</p> <p>The respondent supports the policy approach but advises the Development Brief was approved in February 2009 and not January as stated.</p> <p>The respondent generally supports the policy approach but advises the entire bracketed text at bullet point one be removed as all of the technology park is within South Northamptonshire area.</p> <p>The respondent considers that the JCS cannot make allocations outside its area it can only support such provision.</p> <p>The respondents consider that it is necessary for the development at the Circuit to be supported by further housing growth associated with Silverstone village. In the respondents opinion failure to do this will simply promote large scale commuting to the Circuit which is wholly unsustainable and therefore in conflict with wider policies and objectives in the JCS.</p> <p>The respondent considers the strategic nature of the Circuit development requires clarification</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>by inclusion of the word “strategic” before the word “employment” in the first sentence of the policy.</p> <p>The respondent considers the policy should include text referring to the need for functional links from the Circuit to the settlements of Towcester, Brackley and Silverstone, in particular by strengthening sustainable transport links, and by demonstrating that a sustainable balance would be achieved between economic and employment growth and provision of housing in these nearby and adjoining settlements.</p> <p>The respondent has no objection to the policy but considers that it will provide a limited number of jobs for West Northamptonshire residents. Consequently other employment sites, such as M1 Junction 16 (Midway Park) will be required to meet the needs of business and to provide job opportunities for the residents of West Northamptonshire</p> <p>The respondent welcomes the recognition of the importance of Silverstone Circuit as an economic driver but considers it will not have a significant impact on employment levels within West Northamptonshire as it will generate a high level of in-commuting.</p> <p>The respondent considers Silverstone Circuit should be assessed later as part of a specific SPD/DPD paper.</p>
Policy E6: Education, Skills and Training	81	2	<p>The respondent considers paragraph 8.31 should refer to Moulton College and Northampton College are referred to by name, rather than as ‘the Colleges’ as this will provide consistency with the rest of the document.</p> <p>The respondent considers Policy E6 should refer to support for new educational facilities on the existing campuses of the University of Northampton, Moulton College and Northampton College and other educational institutions and at other sites which are accessible by sustainable transport modes.</p> <p>The respondent question whether employment agreements providing positive discrimination in favour of the local workforce are lawful having regard to EU legislation and otherwise.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Policy E7: Tourism, Visitor and Cultural Industries	82	6	<p>The respondents express support for the policy approach.</p> <p>The respondent considers a policy should be included to assist Northampton Saints Rugby Ground or the Northampton Cobblers Football Ground in providing facilities to a National Standard.</p> <p>The respondent considers that as 'culture' is covered in paragraph 7.25 in the Regenerating and Developing Communities section further mention is not required in the Economic Advantage chapter as the topic should be covered in one section.</p> <p>The respondent considers there is no evidence base to statements regarding increasing tourism.</p> <p>The respondent considers that to be to be consistent with national policy at PPS4 Policy R2 ought to state that Policy E7 applies in relation to tourism in rural areas and the reference to Policy R2 in Policy E7 should be removed.</p> <p>The respondent considers Policy S8 should cross refer to Policy E7, however the latter does not refer to the change of use of rural buildings to uses falling within the B use classes. The respondent considers Policy E7 should in line with PPS4 to refer to reuse of rural buildings.</p> <p>The respondent considers some definition of attractions and facilities of a 'significant scale' should be provided for clarity.</p> <p>Respondents express support for the policy approach.</p>

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Section 9 - Housing Chapter

Policy/ Section	Page No.	No. of Reps.	Summary of the Main Issues Raised by the Representations
Introduction	83	20	<p>Respondents focus on the content of the Strategic Housing Market Assessment (SHMA) and the Viability Appraisal. The key concerns raised are summarised below:</p> <ul style="list-style-type: none"> • The targets recommended by the Viability Assessment for Daventry District are inconsistent with the affordable housing targets set out in Policy H2; • The Viability Assessment findings are challenged on the grounds that the baseline model is flawed and as a result the policy is unrealistic and unsound; • The requirements identified in the SHMA as set out in Table 4 of the JCS are unviable and should either be reduced or deleted; and • The SHMA findings are out of date e.g. they do not reflect changes in economic circumstances, and have not addressed the new affordable rent tenure. <p>One of the respondents suggests the following minor wording changes:</p> <ul style="list-style-type: none"> • Para 9.1 replace reference to development ‘around’ the main towns with ‘adjoining’ • Para 9.6 add reference to registered providers preferring 2 bed units rather than 1-bed units because of the flexibility they provide.
H1: Housing Density and Mix	85	30	<p>Representations which challenge the soundness of this policy are exclusively from the development industry. Whilst there is support for the design led approach developers are objecting to the 35 dwelling minimum average residential density provision on the following grounds:</p> <ul style="list-style-type: none"> • One size fits all approach is not justified; • Not consistent with national policy – i.e. the change to PPS3 removes national target for densities; • No justification in the evidence base for 35 dwellings per hectare. Reference is made to the Northampton Longer Term Growth Options Study and to the SHLAA which use different densities; and

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<ul style="list-style-type: none"> • The term ‘minimum average density’ is unclear and difficult to work out. <p>The key change which is sought is the deletion of the 35dph minimum average density.</p>
H2: Affordable Housing	87	34	<p>Representations which challenge the soundness of this policy are principally from the development industry challenging the percentage requirements for affordable housing both on the grounds of viability and evidence of need.</p> <p>Respondents challenge the Viability Assessment and the baseline model which was used on the following grounds:</p> <ul style="list-style-type: none"> • Base model is not applicable to large sites as it assumes a 1ha site, 100% net to gross (i.e. no allowance for non developable land); • Assumed densities 35/40 dph have not been tested; • 15% developer profit is too low; • 12% allowance for other costs e.g. fees is too low; • Infrastructure costs are too low; • The modelling of a 5000 dwelling SUE is flawed as no SUEs in the JCS are this size; • The Code for Sustainable Homes cost assumptions are too low; • Further falls in land values/ house prices from the 2009 base data in the study; and • No account taken of affordable rent and the changes in HCA funding regimes. <p>To a lesser extent respondents also challenge the SHMA on the following grounds:</p> <ul style="list-style-type: none"> • It does not provide clear evidence of need for additional affordable housing; • The housing mix model is not consistent with CLG guidance; and • It does not consider affordable rent. <p>One representation is challenging the thresholds suggesting that they should be 15 dwellings for both Daventry District and South Northamptonshire.</p> <p>The key change that is being sought by respondents is either the deletion of the % requirements for affordable housing or a reduction in the % that is sought.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
H3: Rural Exception Sites	88	7	<p>One respondent considers that the first bullet point 'within or adjoining the built up area' is too restrictive and not within the spirit of PPS3.</p> <p>One respondent considers that the policy should include some reference to the need for community support for exception sites.</p> <p>On respondent considers that the final bullet point should refer to 'people in local housing need' rather than 'local people in housing need'.</p>
H4 – Specialised Accommodation	89	11	<p>Respondents raise the following concerns:</p> <ul style="list-style-type: none"> • It is unclear how the needs will be identified and quantified; • It is unclear how the policy will be implemented and there is a concern that it could complicate and encumber delivery. • The omission if any reference to 'live-work' units is criticised. • Concern that Paragraph 9.15 implies that the elderly will only be able to live on SUEs.
H5: Sustainable Housing	89	175	<p>158 of the representations are in the form of a standard response submitted by residents in the Wootton/Hunsbury area and relate to a general criticism of the housing policies failure to deal with the needs of the elderly.</p> <p>Respondents raise strong objections to the requirement for 'Lifetime Homes' on the following grounds:</p> <ul style="list-style-type: none"> • They are not necessary or desirable; • They are not justified by evidence e.g. viability assessment does not consider it; • They are unduly onerous and costly; • They will affect viability and delivery; • They should not encourage households to remain in the same home i.e. they should be encouraged to downsize; and • They are Inconsistent with national policy – i.e. lifetime homes not mandatory until Level 6 of CSH. <p>The changes sought by respondents include the deletion of the policy or an amendment to the policy</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			whereby a proportion of lifetime homes would be provided subject to viability, or a policy to 'encourage' rather than 'require'.
H6: Existing Housing Stock	90	2	One respondent considers that the policy could unreasonably restrict the change of use of housing to other uses.
H7: Gypsies and Travellers	92	13	<p>There are no objections to the wording of the policy itself.</p> <p>Some respondents are objecting to the reference in Paragraph 9.21 that gypsy sites could be included within the SUEs where they meet the criteria.</p> <p>One representation expresses concern about the reference to 'fear of crime' in Paragraph 9.25.</p>

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Section 10 – Built and Natural Environment

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Introduction	93	4	Respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.
BN1: Green Infrastructure Connections	96	15	Respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.
BN2: Biodiversity	98	7	Respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.
BN3: Woodland Enhancement and Creation	99	4	Respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.
BN4: Upper Nene Valley Gravel Pits Potential Special Protection Area	100	4	Respondents raise concerns about the proposed 900 m buffer zone in this location, arguing that there is little evidence to support this position. Instead, all these respondents propose that the policy be amended to include restrictions on building height or alternatively residential development in order to protect birds from predation.
BN5: The Historic Environment	102	6	Respondents raise no major issues other than some minor changes which are suggested to aid clarity and comprehension.
BN6: Weedon Depot	105	9	<p>Respondents express in-principle support for the policy and there are no objections to the principle of the redevelopment of the site.</p> <p>A number of minor wording changes are proposed by these respondents which are summarised below:</p> <ul style="list-style-type: none"> • Changes to the wording of the supporting text to reflect heritage significance of the site and factual changes regarding the 'Heritage at Risk Register'; • An alternative mix of uses is suggested which would include employment (B2 and B8),

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			<p>and exclude any residential use;</p> <ul style="list-style-type: none"> • Supporting text should recognise that it is the combination of the individually listed buildings and structures, the spaces between them, their functional and historic connections and wider setting that contributes to the significance of the site as a whole; • Supporting text should ‘positively support’ or actively encourage’ rather than just ‘enable’ the re-use of the site; • A minor re-ordering of the policy wording; and • Reference in the policy to the setting of the individual buildings and structures and the asset as a whole. <p>Respondents also propose a minor wording change to include a reference to the ‘identification and implementation of mitigation measures’ arising from the Transport Assessment.</p>
BN7: Flood Risk	108	64	<p>There is significant opposition to this policy. Most representations consist of standard responses objecting to additional housing numbers in Northampton on the following grounds:</p> <ul style="list-style-type: none"> • Excessive reliance was being placed on Sustainable Urban Drainage Systems to avoid the flood risk to the River Nene which could seriously affect the town; and • Figures for the overall flood risk provided by the Environment Agency for Northampton are currently being questioned, and their assessment of risk is potentially well below that suggested by other sources. Accordingly, the Northampton flood risk assessment needs to be confirmed as correct before the additional housing is approved. <p>Respondents challenge the soundness of the policy on the grounds that there is currently insufficient evidence to justify it and that significant risks exist that need resolving before the policy can be deemed to be sound. The key issues raised in this respect are summarised below:</p> <ul style="list-style-type: none"> • The Sustainability Appraisal does not currently reflect the potential significance of water quality issues and should be updated to consider the final Water Cycle Strategy. Furthermore, the weighting of water quality impacts as part of sustainable development decisions may need to be explored further; • The supporting paragraphs should consider water resource, water quality and flood risk in turn (rather than water quality included as part of water resource and flood risk discussions). The water quality section should reflect the conclusions and

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			<p>recommendations from the Water Cycle Strategy, the requirements of Water Framework Directive and the implications to spatial planning decisions within West Northamptonshire;</p> <ul style="list-style-type: none"> • To protect water quality and deliver growth simultaneously, the Joint Core Strategy may require a locally specific water quality policy set to ensure the Joint Core Strategy's growth in West Northamptonshire is delivered within environmental limits; and • The possibility that significant issues or risks could still remain (even once the above requirements have been satisfied).
BN8: The River Nene Strategic River Corridor	110	4	<p>Respondents support the policy in-principle. Minor changes to the wording are proposed to further elaborate on the historical, ecological and recreational value of the canal network.</p>
BN9: Planning for Pollution Control	111	17	<p>Respondents do not object to the policy itself. Instead, the policy is used to oppose planned development in the South and West of Northampton that would result in increased air pollution from traffic emissions and increase what is perceived to be already poor air quality in these areas.</p> <p>Respondents also propose wording changes to aid clarity and comprehension.</p>
BN10: Ground Instability	112	3	<p>No respondents directly object to the policy. A minor amendment is proposed that seeks to draw a connection between protecting water resources and ground stability.</p>

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Section 11 – Infrastructure and Delivery

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Introduction	113	106	<p>Respondents expressed a number of concerns regarding the level and timing of future infrastructure provision over the plan period, arguing that these would not be able to be provided in time to keep up with the projected development. Respondents submitted that current economic conditions suggest that projected building timescales are optimistic and should be reviewed and that Government and its Agencies should underwrite funding for essential infrastructure before development commences.</p> <p>Respondents raised specific concerns regarding the lack of evidence on the future infrastructure needs of Northampton General Hospital in line with expected growth and the insufficient evidence base to determine the level of investment required for education, water supply and sewerage and on the SUEs projected for North Northampton.</p> <p>Respondents also felt that the infrastructure schedule is incomplete as the source of funding is not secure and lacks evidence as to a realistic cost.</p> <p>A respondent also feels that that sufficient evidence has not yet been prepared in order to justify its support for proposed environmental infrastructure.</p> <p>The majority of representations were received in the form of a standard response. This raises concern about the amount of development that has already occurred during the plan-period without adequate infrastructure and raises a number of questions about future infrastructure provision for health, roads, utilities and education. The response concludes that all new developments in West Northamptonshire should be blocked and the JCS put on hold until the required improvements in infrastructure have been approved and fully financed.</p>
Policy INF1: Approach to Infrastructure Delivery	114	179	<p>A number of respondents wish to see the policy strengthened and/ or clarified and raise the following issues:</p> <ul style="list-style-type: none"> • Respondents feel the JCS needs stronger recognition/ commitment to provide infrastructure alongside housing development and ensure it will have clear sources of

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			<p>funding, be sustainable and provided in a timely manner;</p> <ul style="list-style-type: none"> • The word 'should' should be replaced with 'will' to strengthen the policy; • Respondents express concern about the apparent lack of detail relating to necessary infrastructure required to support the planned growth. First priority is for necessary infrastructure to be constructed prior to building of any of the planned homes, which must be built around the infrastructure, not other way round. It is questioned whether this can be achieved in reality, particularly with the likely disbanding of West Northamptonshire Development Corporation; • Current infrastructure needs should be addressed first, prior to the construction of further development; • Some respondents feel that the policy could be clearer about the work that has already been undertaken to identify infrastructure that is necessary to support development and how this is intended to be delivered; • The policy should be consistent with and refer to the CIL regulations. Specifically that any planning obligation must meet the three legal tests namely that infrastructure provision must be: necessary; directly related; and fairly and reasonably related in scale and kind; • There is a need for tough guidance on infrastructure provision within the JCS. Examples of specific concerns include the need for A45 Flore/ Weedon improvements; • The value of having infrastructure provision linked to development cannot be overstressed. Local Authorities must monitor and enforce S.106 where these form part of approval. Developers should be made to observe and complete their obligations; • A respondent feels that it is important for policies or their supporting text to acknowledge the principle that developers should only be liable for infrastructure which directly relates to their development; • Decisions about what infrastructure is required should be made by local authorities, not developers. <p>A number of respondents have also highlighted where they feel key areas of infrastructure that the JCS does not make adequate provision for, as follows:</p> <ul style="list-style-type: none"> • Rural area infrastructure improvements should include broadband speed provision for every rural household at a speed as fast as in the next town or better;

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			<ul style="list-style-type: none"> • Healthcare provision: A respondent is concerned that there has been no specific reference to the need for investment in Acute Healthcare to meet the planned population growth; • School provision: It is argued that the provision of one new secondary school in Northampton is inadequate; and • A respondent feels that Water Infrastructure needs to be upgraded in order to serve proposed growth in West Northamptonshire. Evidence has not been produced that demonstrates whether revised discharge consents required to serve growth proposed within JCS are achievable with conventional technologies. <p>Other representations focus in the deliverability of infrastructure as follows:</p> <ul style="list-style-type: none"> • Some respondent's estimate that based on a partial assessment of the infrastructure costs listed, a cost of £31,000 would be need related to each home. Respondents consider that this is an unrealistically high cost for developers in what is likely to be difficult period for house builders. • Public sector funding is required, and the respondent feels it is likely to be much reduced on earlier years; and • Respondents feel that there needs to be a greater account of the short to medium term economic situation and its relationship to delivery of infrastructure and the stated natural growth needs; <p>One respondent considers that the JCS promises increased economic investment at Paragraph 11.6, but this is contradicted elsewhere in evidence base where experts have assessed the West Northamptonshire area and its associated employment market and admit there's an insatiable demand for warehouses; hardly qualifies as a source of "high tech jobs";</p> <p>One respondent feels that there is no mention is made of how localism bill and associated changes to planning law and how they will affect and change Policy INF1 especially in regards to rural villages and their relationship to urban conurbations.</p>
Policy INF 2: Contributions to Infrastructure Requirements	118	86	A number of respondents raised similar issues to those summarised in Policy INF1 above, for example concerns regarding the provision of infrastructure ahead of housing rather than retrospectively. They also mention the unrealistically high cost for developers (The infrastructure costs equates to a cost per home of £28,159 they feel), and the principle that

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			<p>developers should only be liable for infrastructure which directly relates to their development.</p> <p>Representations also identify some specific items of infrastructure which should be addressed by the policy as follows:</p> <ul style="list-style-type: none"> • Some respondents feel it is essential that schools are provided to service new communities around Northampton in conjunction with development and occupation of those areas; • Also some respondents feel that potential contributions to flood risk management infrastructure should be included; • Some feel that no commitment is given towards contributions to Northampton General Hospital; a facility that would inevitably be further overloaded by developments in question; and • Another respondent felt that the A43 improvements should be listed in Table 7. <p>Many respondents focussed on the CIL regulations and the following key points are made:</p> <ul style="list-style-type: none"> • The legal compliance and soundness of the policy is challenge on the grounds that it does not accord with CIL regulations and Circular 05/2005. In particular, the policy should recognise that any planning obligation will need to pass the statutory tests of CIL Regulation 122. • Confirmation is sought whether retail development is included in definition of commercial development and if CIL will be sought for development of this use; • Some respondents feel that the policy should be amended to refer to the need for the respective councils to assess the cost of infrastructure and seek an appropriate level of contribution from developers through the mechanism of the CIL. The policy gives the impression that pooling of developer contributions via the S106 mechanism can still continue to provide a basis on which to raise contributions towards infrastructure; and • Some consider that there does not appear to be any clarity in terms of determining how the choice between schemes that are development-specific and those where pooled contributions apply will be made. <p>Respondents have suggested a number of detailed wording changes are proposed to the</p>

Policy/ Section	Page No.	No. of Reps.	Summary of the Main Issues Raised by the Representations
			<p>policy and supporting text concerning CIL.</p> <p>There is criticism from a respondent regarding the intention to produce an SPD to provide further guidance on developer contributions. PPS12 gives guidance on infrastructure planning and indicates that Core Strategies should identify strategic infrastructure requirements and give clear steer as regards to its delivery. This should not be delegated to an SPD. Specifying future documents can cause problems due to possible delays or future changes, and therefore it would be better not to refer to a future SPD.</p> <p>One respondent feels that there is no mention is made of how localism bill and associated changes to planning law and how they will affect and change Policy INF2 especially in regards to rural villages and their relationship to urban conurbations.</p>
West Northamptonshire Infrastructure Delivery Plan (IDP)	119	27	<p>The following issues are raised by respondents in respect of Table 7 – Key Primary Infrastructure Projects:</p> <ul style="list-style-type: none"> • Objection is raised to the implication that the 'A45 Northampton - Daventry Corridor Improvements' are required solely as a result of the Daventry North East SUE; • The current option for the A45 upgrade as single carriageway is inadequate to serve future development in Daventry; • Clarification is sought regarding the Flore-Weedon Bypass and the A45/ A5 crossroads; • A respondent feels that the A5 Towcester Relief Road should be identified as a Key Primary Infrastructure Project. Respondent feels the Towcester Transport Study demonstrates the need for a relief road; • A respondent feels that it is unclear whether Table 7, together with supporting Infrastructure Delivery Plan and the supporting text between Paragraphs 11.30 - 11.39 is formally part of the JCS or is just for information in the context of Policy INF2. In the event that this is a policy requirement of the JCS, then, they feel, it needs to be subject to the tests of soundness; • One respondent is concerned that Table 7 does not refer to the A45 Growth Management Strategy. The A45 Corridor Study demonstrates the need for this scheme to safeguard the A45 from the impact of committed and allocated development in the Northampton area; • Northern Relief Road (Including the A428 and A5199). This road should pass to the

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			<p>north, rather than the south of Harlestone Firs. Completion, the respondent feels, should also be linked to the development of the North of Whitehills SUE;</p> <ul style="list-style-type: none"> • Respondent feels that further information is required to prove that the Northern Relief Road is deliverable, including when and by whom the Relief Road will be funded and constructed; • Objections are raised in relation to the Northern Relief Road in relation to: <ul style="list-style-type: none"> a) The inconsistent terminology used for the Northern Relief Road/ North West Bypass; b) The delivery of the road not being viable; and c) The obligation requiring the completion of the Northern Relief Road within the first 3 years of initial dwelling completions at Kings Heath SUE. • Some respondents refer to enhanced utilities provision, as well as a responsibility of the statutory undertakers and should not be a planning policy requirement. Elevating such matters to a policy requirement, they feel, may serve only to inflate costs, reducing the overall viability of a scheme and reducing funds available for S106 items; • The Sandy Lane Improvements North is already completed; and • Clarification is sought by some respondents regarding capacity at Whilton Waste Water Treatment Works <p>A number of representations challenge the soundness of the IDP as follows:</p> <ul style="list-style-type: none"> • There is uncertainty about the need, costs, funding sources and delivery mechanisms for the key infrastructure projects identified; • The Obligations sought are unlikely to satisfy the tests set out in Regulation 122 of the CIL Regulations 2010; • The respondent feels that Paragraph 11.34 and Table 7 should be amended to say that the list of 'key infrastructure projects' is indicative and each development will be considered on its own merits, flexibly, in line with the aims of paragraph 11.36; • The methodology used to create infrastructure costs in the IDP and the omission of necessary key transport infrastructure such as the A43 Moulton - Broughton improvement as part of the A43 Northampton to Kettering strategic corridor improvement are material factors in determining the soundness of the plan; and • The respondent feels that the IDP is merely an infrastructure 'wish list' with numerous

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			omissions with flawed cost projections that ignore 'best practice'.

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 12 - Northampton

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Introduction	124	1	The respondent considers reference should be made to the importance of the historic environment of the town centre. The respondent considers there needs to be a better link between the evidence base with respect to the identification of heritage assets in this area and the plan.
Policy N1: The Regeneration of Northampton	126	65	<p>48 of the responses are standard responses. These respondents are of the opinion that there is a lack of hospital provision related to growth.</p> <p>The respondent considers a full appraisal of the existing network of shopping provision has not been undertaken and the immediate shortfall in retail floorspace is not addressed.</p> <p>The respondent considers that for local shopping within the SUEs, the words "of an appropriate scale" should be inserted after "...shopping, services and facilities."</p> <p>The respondent considers that restricting proposals for retail development in town centres and SUEs fails to take account of existing need in existing housing areas.</p> <p>The respondent considers the policy should refer to a strategic employment site for high quality B1 at Houghton Gate.</p> <p>The respondent considers that after 'heritage attributes' the words 'and historic character' should be added.</p> <p>The respondent considers an additional bullet point is required to read 'support improvements to the transport network to improve connectivity, safety and journey reliability'.</p> <p>Delete 'housing' in second bullet as this relates to all development.</p> <p>The respondent considers the JCS over-estimates the town as a regional centre (it is not</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>competitive with Milton Keynes) and under-estimates the connection of the town with the historic nature of its wider surroundings.</p> <p>The respondent considers there is a lack of understanding within the JCS in relation to the provision of infrastructure needs and its funding.</p> <p>The respondent supports brownfield development and containing growth within Borough boundaries as far as possible.</p> <p>The respondent considers proposals for South and West areas of Northampton are largely entered upon access roads from M1 (Junctions 15, 15A, 16), via A45, A508 and A4500 which already suffer from severe congestion.</p>
Policy N2: Northampton Central Area	128	24	<p>The respondent considers the final sentence of Paragraph 12.18 relating to restricting comparison retailing outside the town centre is unsound and should be deleted.</p> <p>The respondent considers that the justification for additional convenience floorspace within the town centre is not robust. The respondent considers there is an immediate need for retail floorspace that will and will not be satisfied by the proposed convenience shopping development for the town centre and the SUEs. The respondent considers the opportunity must be given to examine the approach of the JCS as the evidence base to support the shopping hierarchy is deficient and inadequately justified.</p> <p>The respondent considers that the second bullet point of Policy N2 should be replaced with “3,000sqm convenience (food) shopping floorspace for the period 2010 to 2026 within the periphery of the central area; and”.</p> <p>The respondent considers additional text is required in the JCS to refer to the opportunity for convenience goods retailing in the Central Area and suggest an increase in the convenience floorspace from 3000sqm to 8000sqm. The respondent also considers figures should be clarified as being net.</p> <p>The respondent strongly supports the policy approach and Paragraph 12.18 however, they consider a stand-alone policy to support the redevelopment of the Grosvenor Centre as a</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>strategic site should be included.</p> <p>The respondent considers the 45,000sqm of comparison floorspace (2010- 2021) for the town centre is different to that in the CAAP.</p> <p>The respondent considers additional wording is required at the end of the first sentence of the second paragraph to read ‘...on sites identified within the Central Area Action Plan.’</p> <p>The respondent considers that the policy should be rewritten to make clear that financial services are appropriate in designated shopping frontages.</p> <p>The respondent considers that the level of detail in the policy is premature as the CAAP is not at an advanced stage. The policy should be more generalised until the CAAP is adopted and floorspace figures removed.</p> <p>The respondent considers there is a need to emphasise the county town status and the importance of focusing on redevelopment.</p> <p>The respondent considers that appropriate Flood Risk Management and the opportunities for betterment should be included within Policy N2</p> <p>The respondent considers the provision of infrastructure and its funding lacks clarity.</p>
Northampton Related SUEs	129	3	<p>The respondent considers statements on transport infrastructure needs would be clearer if they were prefixed by “The development should mitigate its impact on the transport network through measures including:”</p> <p>The respondent considers that the challenge of delivering Park and Ride for Northampton, even on the busiest corridors, by 2026 is sufficient to make most of the allocated Park and Ride sites unlikely to be brought forward within the plan period. The respondent considers the only one that is believed to have potential is the site associated with the A43 at Northampton North SUE as this is the busiest of the northern approaches to the town centre, and there is an opportunity to combine Park and Ride with a new bus service to the development, in a way that will not be possible at other sites. The respondent considers with the exception of Northampton North Park</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>and ride sites should be deleted from the plan.</p> <p>The respondent considers greater clarity is required on the need for and the approach to the delivery of the A45 Northampton Growth Management Strategy. This could be achieved through referring specifically to the need for SUE development to contribute towards the provision of strategic infrastructure.</p> <p>The respondent considers that brownfield land should be developed first. The respondent also considers development should not be concentrated around a single place as infrastructure will not cope and the environment will suffer and Park and Ride is not a sufficient solution to the transport problems.</p>
Policy N3: Northampton North SUE	130	48	<p>The respondent supports the allocation but considers the policy should be amended by;</p> <ul style="list-style-type: none"> • Deletion of reference to park and ride; • Greater flexibility for Primary school provision; • Flexibility of the quantum of the Technology Realm; • Deletion of reference to health care and library provision; • Review of the retail limit as contrary to PPS4. <p>The respondent considers the floorspace limit for retail convenience store should be deleted.</p> <p>The respondent considers the JCS does not address the existing shortfall in convenience retailing for urban areas by requiring all new floorspace to be in the town centre and SUEs.</p> <p>The respondent considers that reference to local centre and floorspace limit should be removed.</p> <p>The respondent considers Northampton North SUE should be reduced to the southern portion of the site only with a capacity of 1,000 dwellings and the remaining quantum of development relocated to an allocation at Northampton North of Holly Lodge Drive SUE which the respondent considers is a more sustainable site.</p> <p>The respondent considers the SUE should revert to at least 5,660 dwellings.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>The respondent considers proposes a 20 acre (200 dwelling) site adjoining the Sandy Hill at Moulton as an additional allocation for the JCS.</p> <p>The respondent considers Northampton North is unjustifiably allocated and development should be spread along the northern fringe in a more sensitive manner as per Option 3 of the Northampton Longer Term Growth Options Study to include a small site at Boughton Green Road (with consent for hotel) which is deliverable available and achievable.</p> <p>The respondent considers Policy N3 should be amended to include reference to an appropriate package of infrastructure including a link from the A43 towards Holcot, and that specific reference should be made within the Policy to the Park and Ride serving local employers such as Moulton College and the University of Northampton</p> <p>The respondent queries the deliverability of the site given the identified infrastructure burden. The respondent also has concerns regarding coalescence with Overstone.</p> <p>The respondent considers the housing provision at Northampton North should be increased to at least 4,500 dwellings to 2026 with a further post 2026 requirement to at least 5,400 dwellings with consequent deletion of SUEs at Northampton West and Northampton South.</p> <p>The respondent considers additional wording should be added to the policy to require the development to mitigate its impact on the transport network. The respondent also considers a 3ha site for park and ride is excessive and reference to a bus service for the P&R should be included in the policy wording.</p> <p>The respondent considers that the allocation should be strictly limited to 2,000 dwellings within the red line site, that traffic problems should not be further exacerbated and that the setting of Pytchley Gates and views of Overstone Park should be protected.</p> <p>The respondent comments that Paragraph 12.27 suggests the Technology Realm location is shown on Inset Map 5 when it is not.</p> <p>The respondent expressed concern regarding the viability of the SUE against infrastructure</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>funding. The respondent considers a comprehensive solution for the improvement of the A43 between Northampton and Kettering to be essential in resolving issues of traffic congestion and improving connectivity along this strategic transport corridor. The respondent further considers the extent and location of the proposed development at Northampton North should be reviewed in order to avoid coalescence and ensure adequate protection of the setting and character of Overstone and Overstone Park. The respondent considers that the scale of the proposed structural greenspace is insufficient to adequately prevent the erosion of the setting and character of Overstone and Overstone Park.</p> <p>.The respondent considers reference should be made to the inclusions of Flood Zones 2 and 3 within the discussion on Northampton North SUE.</p> <p>The respondent considers that the policy should refer to "flood risk management schemes" rather than "flood attenuation".</p> <p>Respondents offer general comments, these are; -</p> <ul style="list-style-type: none"> • Development will lead to local traffic congestion; • The area is of landscape importance; • Gas pipes and power lines dissect the site; • Will the water supply and waste water system cope?; • There will be significant disruption for existing residents; • There is potential for the area to flood from Overstone Lake; • There will be an impact on protected birds; • Agricultural land is needed for food production; • Property will be devalued locally; • Increased noise and chemical pollution; • Assurance is needed that services and facilities will be provided; • What is the cost of the development?; • Dualling of the A43 Moulton Bypass should be linked to this SUE; • Development should respect the rural character of Moulton and Overstone; • The development should be spread between the other SUEs as the site is unsustainable; • Northampton North is not 3.5km from the centre of Northampton;

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<ul style="list-style-type: none"> • The inset map is incomplete; • Billing Brook watercourse should be correctly described; • The Inset map should show the location of the Technology Realm; • The Technology Realm will not be delivered; • A comprehensive highway study is required together with evidence to show the Park and Ride is economically viable; • Highway infrastructure identified is insufficient and the costing for it is too low; • The development is not viable due to infrastructure costs; and • The area is not all arable land as described in para. 12.22. <p>Respondents support the allocation.</p>
Policy N4: Northampton West SUE	132	1355	<p>Over 1,310 responses were made by local residents largely responding via petitions. Local groups and organisations also responded.</p> <p>The comments cover the following points:</p> <ul style="list-style-type: none"> • The SUE should be dropped - no development should be allowed west of new road; • Sandy Lane Improvement North Road has been omitted from the CS and therefore the plan is, inaccurate, misleading and unlawful; • Not on a sustainable urban extension as it is not a sequentially preferable location or contiguous with the urban area as it is severed by the Sandy Lane Improvement North; • The site is isolated in a rural location with boundaries to the East, to the North, to the West and exposed to open countryside on all three sides; • A series of bridges and underpasses would be required to connect the SUE with existing urban development; • The proposal based upon an urban development located in a rural environment and is clearly not sustainable; • Alternatives to the North of Northampton (such as North East of Kingsthorpe, Holly Lodge Drive, Moulton Park and Moulton), are a sequentially preferable sustainable urban extensions; • A primary school would be isolated and difficult to access; • The land is owned by the two Harpole Charities since 1778, which is not acknowledged in the document, and contravenes Policy R1 as this land is of significant historic importance;

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<ul style="list-style-type: none"> • The development of areas around the south and west will adversely affect areas already suffering from pollution issues; • Farmland is required for food production; • Further explanation is required to demonstrate how the new and existing areas will interconnect and share facilities; • Historic Harlestone village will be spoilt and lose its identity; • The location of the site will encourage out commuting via the M1; • Local roads are already congested; • Brownfield sites must be developed first; • The SUE was not shown in the EJCS; • The SUE should be replaced by extensions to Wootton Park and Grange Park; • The SLRR should be considered the western boundary of Northampton's development; • An alternative location is to the north of Northampton, North East of Kingsthorpe, Holly Lodge Drive, Moulton Park and Moulton; • Villages must retain their identity; • Insufficient clarity on infrastructure provision and funding; • Lack of evidence that sewage works has capacity; • Need to prevent coalescence through policy provisions; • Impact of flooding and need for flood attenuation not clear; and • Concerned regarding deliverability of the Northwest bypass without it there would be an adverse effect on quality of life for Brampton residents. Traffic calming also required. <p>The respondent object to the limit of retail floorspace and reference to local centre.</p> <p>The respondent considers careful attention will be required through master planning to ensure the site is well integrated, and care given to Harlestone conservation area as well as protecting against coalescence. The respondent considers there should be no access through Port Road.</p> <p>The respondent considers Paragraph 12.30 should note that Harlestone Firs is designated as a County Wildlife Site, that Harlestone is designated as a Conservation Area and that Paragraph 12.31 should refer to replacement of ecological interest as the road scheme will result in the loss of some features.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>The respondent considers the words "a contribution towards" are not specific enough as a minimal amount could satisfy this requirement.</p> <p>The respondent considers Sandy Lane Improvement (North) is already built so reference to land provision should be removed.</p> <p>The respondent considers it is unclear whether improvements to A508 corridor should be linked to this site as this road is distant from the site.</p> <p>The respondent considers the policy should refer to "flood risk management schemes" rather than "flood attenuation".</p> <p>The respondent supports the allocation however, they object to the need to contribute to the North West Bypass and the delineation of 'Strategic Green Space'.</p> <p>The respondent considers the allocation should be increased to 5,400 dwellings</p> <p>The respondent considers the SUE is unviable and unsustainable.</p> <p>The respondent considers Northampton West SUE should be deleted in favour of allocation of a proposed Northampton North of Holly Lodge Drive SUE.</p>
Policy N5: Northampton South SUE	134	189	<p>159 of the responses are standard representations received from local residents in the Hunsbury and Collingtree area. The responses relate to flooding issues, highway issues (traffic congestion and road noise) and the impact of affordable housing on the character of Collingtree.</p> <p>The respondent considers Northampton South should be deleted on the basis that the SUE is infrastructure heavy and would promote car borne trips due to its proximity to the M1. The respondent considers development at Northampton South should be replaced by additional land allocated at Northampton North.</p> <p>The respondents consider key issues raised in objection to the allocation relate to the perceived constraints including archaeology, ecology, noise and air pollution, sand and gravel</p>

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			<p>safeguarding, impact on the local highway network, poor accessibility particularly by public transport, and viability of infrastructure.</p> <p>The respondents consider greater flexibility is required towards retail development on the site including the deletion of the 500sqm floorspace limit.</p> <p>The respondent supports the allocation but considers the allocation should be extended to include additional land to the west up to the railway line.</p> <p>The respondent objects to the exclusion of land from the allocation on the basis that it is not justified and is inconsistent with the SHLAA.</p> <p>The respondent considers the policy should refer to 'flood risk management schemes rather than 'flood attenuation'</p> <p>The respondent considers the policy wording should be changed to: 'The development should mitigate its impact on the transport network through measures including:'</p>
Policy N6: Northampton South of Brackmills SUE	136	19	<p>The following points were raised by respondents:</p> <ul style="list-style-type: none"> • Concern expressed about the capacity of secondary education, with particular reference to the Caroline Chisholm School: • Lack of recognition of the landscape sensitivity of the 'Nene Ridge' within the JCS and the policy. There is a specific request for the provisions of existing Northampton Local Plan policies relating to landscape and skyline development being included within Policy N5; and • The area is already densely populated and development could be better accommodated to the north and north-east of Northampton <p>The respondent considers an additional area of land, which is physically detached from the Brackmills SUE to the south and east of Wootton Fields, should be allocated to accommodate an additional 1000 dwellings:</p> <p>The respondent considers an additional 24ha of land to the east of the SUE should be allocated</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>which would increase its capacity to 1500 and make it more sustainable.</p> <p>Representations from retail interests seek greater flexibility towards retail development on the site including the deletion of the 500sqm floorspace limit.</p> <p>The respondent considers the policy wording should be changed to refer to 'flood risk management schemes rather than 'flood attenuation'.</p> <p>The respondent considers the policy wording should be changed to state: 'The development should mitigate its impact on the transport network through measures including:'</p> <p>The respondent suggests the inclusion of the following within the policy: 'Archaeological and ecological assessment of the site and required mitigation.'</p> <p>The respondent support the policy and is committed to the delivery of the SUE.</p>
Policy N7: Northampton Kings Heath SUE	138	14	<p>The respondent considers he policy should refer to "flood risk management schemes" rather than "flood attenuation" and in Paragraphs 12.52-12.58 reference should be made to the inclusions of Flood Zones 2 and 3 within the discussion on Northampton Kings Heath SUE.</p> <p>The respondent considers the policy wording should be changed to include, 'The development should mitigate its impact on the transport network through measures including:' and that wording is changed to state "Provision of part and financial contribution towards completion of the North Western Bypass".</p> <p>The respondent support the allocation of the SUE but consider amendments to the policy should include;</p> <ul style="list-style-type: none"> • A need to recognise a phased delivery will be necessary - anticipated to be 1,950 with further environmentally unconstrained land to follow capable of delivering some 2,950 in total; • Further testing of the environmental constraints on the remaining and will be required for a development of 3,500 dwellings to be achieved; and • Strongly object to the linkage currently proposed in relation to the Kings Heath allocation in Table 7.

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>The respondent considers there will be a need to review the retail component.</p> <p>The respondent the extent of Structural Greenspace shown on the Proposals Map should be larger, particularly to the north west boundary with Harlestone Firs and the River Nene valley to the east.</p> <p>The respondents consider that the JCS does not address the existing shortfall in convenience retailing for urban areas by requiring all new floorspace to be in Northampton town centre and SUEs. The respondents consider reference to local centre and floorspace limits should be removed.</p> <p>The respondent questions the viability of the North West Bypass and the Park and Ride and feel that traffic calming in the Bramptons will be required.</p> <p>The respondent considers clarity is required on what "Community Facilities" might be in contrast to clearly defined educational provision within the policy text. The respondent draws attention to the fact that the existing developments of St Crispins, Upton and the Timkin site have no provision for new worship areas.</p> <p>Respondents consider the highway mitigation proposed is insufficient.</p> <p>Respondents express support the principle for the development of the SUE.</p>
Policy N8: Northampton North of Whitehills SUE	140	16	<p>The respondent considers there should be mention of the historic village of Boughton in the text. The respondent further considers the development is not needed and the allocation should be deleted.</p> <p>Respondents consider the North West Bypass should be shown more accurately on Figure 4.</p> <p>Respondents consider there will be local road congestion as a result of the development and the mitigation required should be specified.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>The respondent questions the viability of the Park and Ride site and the delivery and funding of the North West bypass. In addition the respondent considers traffic calming in the Bramptons will be required</p> <p>Respondents consider the SUE is neither viable nor sustainable and that the highway mitigation proposed is insufficient</p> <p>The respondent considers the status of the SUE as an existing allocation through an adopted DDLP means it should be treated as a commitment.</p> <p>Respondents consider that the JCS does not address the existing shortfall in convenience retailing for urban areas by requiring all new floorspace in Northampton town centre and SUEs. Respondents consider reference to local centre and floorspace limits should be removed.</p> <p>The respondent considers any development within Northamptonshire would represent an increased burden on the provision of Secondary healthcare for the county and it is therefore imperative that any developments that are delivered through would need to formally involve consultees including the hospital along with the Primary Care Trust and NHS Northamptonshire.</p> <p>The respondent considers the supporting text should refer to financial contributions being required for improvements to the Cock Hotel junction.</p> <p>The respondent considers that all transport mitigation measures are preceded by a statement such as "The development should mitigate its impact on the transport network through measures including:" and reference to land provision for the North West Bypass in the policy should be deleted.</p> <p>Respondents express support for the principle of development of the SUE.</p>
Policy N9: Northampton Upton Park SUE	142	136	<p>121 of the 136 representations were submitted as a standard from stating that;</p> <ul style="list-style-type: none"> • There should be no development west of the new road; and • The Country Park extension should be confirmed in Norwood Park/ Upton Lodge development between Sandy Lane and the new road.

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>Respondents consider that the JCS does not address the existing shortfall in convenience retailing for urban areas by requiring all new floorspace in Northampton town centre and SUEs. Respondents consider reference to local centre and floorspace limits should be removed.</p> <p>The respondent supports the extension of the Country Park and reference to green links.</p> <p>The respondent considers reference to archaeological assessment of the site and required mitigation should be made in the policy; and also that measures to ensure the protection of the setting of listed buildings and the scheduled monument at Upton should be included in the policy text. The respondent considers also considers Inset Map 13 should include the boundary of the scheduled monument and an indicative buffer to protect the setting of the heritage assets.</p> <p>The respondent suggests all transport mitigation measures are preceded by a statement such as "The development should mitigate its impact on the transport network through measures including:"</p> <p>The respondent considers clarity is required on what "Community Facilities" might be in contrast to clearly defined educational provision within the policy text. The respondent draws attention to the fact that the existing developments of St Crispins, Upton and the Timkin site have no provision for new worship areas.</p> <p>The respondent supports the allocation in principle, however suggests some wording changes to include replace 2016 with 2013 in Paragraph 12.70 as the development can commence earlier and to include the word 'approximately' before '1,000 dwellings' to allow for flexibility in the master planning of the site. The respondent further considers the allocation of 'Structural Greenspace' is too detailed for the purposes and objectives of a Core Strategy and considers this would be better refined through the master planning process. The respondent however supports the need for Structural Greenspace and suggests a criterion is added to the policy as a way of providing guidance on what is required on-site rather than an allocation on an inset map.</p> <p>The respondent questions what road improvements are to be made to encourage people to travel into Northampton from the western side of the county.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>The respondent is concerned that villages must retain their identity and not be swallowed up by towns.</p> <p>Respondents express support the principle for the development of the SUE.</p>
Employment	143	2	<p>The respondent considers the final sentence of Paragraph 12.72 should be deleted as the allocation of a further strategic employment sites on the edge of Northampton is necessary due to the shortfall in Northampton of high quality, deliverable sites.</p> <p>The respondent considers reference to additional strategic employment sites should be made in the penultimate sentence of Paragraph 12.74. The representation recommended that the sentence be reworded to include mention of both a strategic employment site and a 'technology realm'.</p>
Policy N10: Shopping Needs Outside Northampton Town Centre	144	9	<p>Representations raise concerns about the restriction of additional comparison goods floorspace outside the Northampton central area.</p> <p>The respondent considers the policy is not necessary and is inappropriate over the lifetime of the plan.</p> <p>Respondents express support for the policy approach.</p>
Policy N11: Supporting Areas of Community Regeneration	146	2	<p>The respondent objects to the policy on the grounds that there seems no attempt to connect Policy N11 with Policy N4 despite dealing with the same area, Kings Heath and Spencer.</p> <p>The respondent supports the policy but suggested additional amendments to read :-</p> <p>"To support the regeneration of Spring Boroughs, Kings Heath / Spencer and Northampton East, Northampton Borough Council will, working in partnership with other service providers and with the full involvement of the local community, set out a strategy approach designed to address the key principles of delivering inclusive, sustainable communities, to include the following....."</p>
Policy N12: Northampton's Transport Network	149	4	<p>The respondent considers the Policy should be amended to identify the strategic transport infrastructure that is to be funded through CIL and that the supporting text refers to the strategic transport measures for Northampton as set out in the infrastructure schedule.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Improvements			<p>The respondent expresses concerns that the policy provides no detail on how connectivity with Healthcare is to be improved and the lack of public parking on the hospital site.</p> <p>Representations suggest amendments to Policy N12 to link the proposed improvements to the bus station as part of the delivery of the Central Area Action Plan. These include amending policy N12 to refer to sustainable transport modes to link principal destinations, improved connectivity throughout the Central Area from all parts of the town, reference to Northampton Castle Station and Greyfriars Bus Station as priority interchanges, and reference to 'redevelopment' of the Grosvenor Centre.</p>

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 13 - Daventry

Policy/ Section	Page No.	No. of Reprs	Summary of the Main Issues Raised by the Representations
Introduction	150	1	The respondent considers reference should be made to the Town Centre Vision produced with the Civic Trust in 2004 and to the new masterplan, which is being prepared for Daventry town - Daventry 2040.
Daventry Today	150	5	<p>The respondent considers reference should be made to proposals for Site 5 at Daventry town and a need to identify where the WaterSpace is, and to reference the proposals by directing to the information set out on the Daventry District Council website.</p> <p>The respondent considers reference should be made to the development proposals at Eastern Way.</p> <p>The respondent considers that the Waterspace project is described as a proposal but text goes on to describe what it will provided when no decision has been made. The respondent comments that proposals are opposed by some and there is no evidence base in the JCS to support its provision financially, consequently reference to it should be deleted.</p> <p>The respondent is unconvinced that Southbrook as an area needs attention and doubts that planned new developments will give Southbrook amenity value as they are too far way. The respondent considers other areas are more in need of regeneration [these other areas are not named].</p> <p>The respondent questions whether major residential development in the town centre is desirable, as they will take away employment and leisure options on what is currently open space?</p> <p>The respondent considers there is a need for wider vision for West Northamptonshire's growth and how the length of travel will be reduced between connecting points.</p> <p>The respondent considers a better variety and quality of development is needed before</p>

Policy/ Section	Page No.	No. of Reprs	Summary of the Main Issues Raised by the Representations
			expanding too far away from Daventry town centre. The respondent also considers there is a need to consider facilities for the younger generation and for the disabled.
Policy D1: The Regeneration of Daventry Town	153	7	<p>The respondent considers an additional bullet point/ additional supportive text is required for D1 to reference the desirability of developing a green infrastructure network for the town, as set out in the Daventry Infrastructure Studies, Main Report, January 2009.</p> <p>The respondent considers an additional item should be added to Appendix 4 West Infrastructure Schedule, page 219, highlighting the need for improvements to Borough Hill Country Park and Burnt Walls scheduled monument.</p> <p>The respondent objects to the wording in Paragraph 13.19 as they consider it implies that the required improvements to the A45 arise solely as a consequence of the SUE.</p> <p>The respondent considers Monksmoor Farm should be identified via a JCS policy and by notation on the Key Diagram in order that a long term commitment to the development is enshrined in policy in the event that a renewal of consent or new application was needed.</p> <p>The respondent considers reference should not be made to planning consent being granted in 2009 for an SUE at Monksmoor as it was only outline consent and site may not be delivered. The respondent further considers that Paragraph 13.17 contradicts the planning appeal judgement as it suggests that further development additional to the Monksmoor site can take place without resolution of the highway issues. The respondent's interpretation is that a total of 800 units across Daventry could be allowed before the highways issues are resolved. The respondent considers that as funding for this comes from developer contributions at Monksmoor, it is the only that site which can be allowed to proceed at this stage.</p> <p>The respondent considers there needs to be some consideration of surface water management in the policy.</p> <p>The respondent considers that without the A45 bypass and its part public funding the Daventry North East SUE cannot be brought forward, consequently the JSC cannot be considered 'sound'. The respondent considers Policy D1 should be amended to remove the reference to 'Daventry</p>

Policy/ Section	Page No.	No. of Reprs	Summary of the Main Issues Raised by the Representations
			<p>North East SUE' as until funding is made available for the bypass the site cannot be delivered. The respondent considers to maintain a 5 year land supply an alternative SUE is proposed to south east of the town and fronting the A45, which can be 'accommodated on the existing line of A45'.</p> <p>The respondent considers Daventry District Council's Open Space Sport and Recreation Needs Study (2009) should be incorporated into all development plans. In the respondents opinion Daventry has a deficiency in open space and recreation facilities and any lost should be replaced, for example at Eastern Way. The respondent considers that a canal should not be considered a green space.</p> <p>The respondent considers topography should be fully understood in overarching planning decisions.</p> <p>The respondent asks if there evidence to show that Daventry needs hotels and residential areas in the Town Centre.</p> <p>The respondent considers the JCS needs to demonstrate it is serious about its objectives without publishing contradictory plans for example providing more housing but in the town centre at eth expense of leisure facilities, open space and space for more retail facilities.</p>
Policy D2: Daventry Town Centre	154	3	<p>The respondent considers that the policy must acknowledge how the historic environment will inform the approach to development in line with the Government's objectives. The respondent recommended additional text to promote heritage-led regeneration within the conservation area.</p> <p>The respondent considers there needs to be some consideration of surface water management in the policy.</p> <p>The respondent considers new shops and big retail names will force out individual traders and the town centre will lose its appeal.</p>
Policy D3: Daventry North East Sustainable	157	22	<p>The respondent considers Policy D3 should refer to "flood risk management schemes" not "flood attenuation" as flood risk management can include attenuation but could include many other measures. In addition the respondent considers Policy D3 should be strengthened to ensure no</p>

Policy/ Section	Page No.	No. of Reprs	Summary of the Main Issues Raised by the Representations
Urban Extension			<p>development is located within the extent of the dam break area.</p> <p>The respondent considers that nationally important designated heritage assets should be shown on the inset map, in the same way as nature conservation sites are shown.</p> <p>The respondent considers Borough Hill could provide enhanced green space for the residents of the SUE, as well as existing residents and visitors, and should be referred to in this policy. The respondent further considers an additional bullet point should refer to financial contributions to improvement to Borough Hill as part of the Green Infrastructure Network</p> <p>The respondent considers that the criteria for the development of this SUE should refer to the need for archaeological or ecological assessment, as there are references to the need for archaeological assessments in other SUE policies, e.g. Policy N3.</p> <p>The respondent considers "A contribution towards" is not specific enough, as a minimal amount could satisfy this requirement. Policy D3 should read "The development should mitigate its impact on the transport network through measures including...."</p> <p>The respondent expresses concern over the impact of growth in Daventry on the A5/A45 junction at Weedon. The respondent comments that currently there are no plans to improve the A5/ A45 junction beyond what should be delivered as part of the Monksmoor development. The respondent is of the opinion that the inspector considering the conjoined planning appeals for Daventry in 2009 commented that no further significant development should be allowed in Daventry until the link issues through Flore and Weedon are addressed.</p> <p>The respondent considers that the JCS is unsound as there is no justification for restricting Daventry North East to three local centres and limiting the size of stores. The respondent is of the opinion that the floor space figures are arbitrary, lacks flexibility and should be deleted.</p> <p>The respondent supports the allocation, but considers that restricting development to commence from the south eastern edge places an unreasonable constraint on the developer. In addition the respondent considers the development should provide for a two local centres and a district</p>

Policy/ Section	Page No.	No. of Reprs	Summary of the Main Issues Raised by the Representations
			<p>centre given the scale of the development and that restricting individual stores to not exceed 500sqm will result in the development not sufficiently meeting the needs of residents.</p> <p>The respondent considers that placing an arbitrary limit on the quantum of housing development to be delivered by 2016 is an unjustified and unnecessary constraint. The sentence should be reworded to read 'At least 2,500....'</p> <p>The respondent considers the Monksmoor Farm development should be allocated via Policy D3, shown on the relevant maps and referred to in the supporting text at Policy D3.</p> <p>The respondent considers land at Daventry North East SUE should be reserved for development post 2021 and the JCS should allocate land adjacent to Boughton for Northampton North of Holly Lodge Drive SUE with a capacity of circa 1,000..</p> <p>The respondent considers the allocation of Daventry North East SUE is not the most appropriate strategy when considered alongside all reasonable alternatives and the JCS is therefore unsound. The respondent considers Policy D3 and Daventry North East SUE should be deleted from the JCS and land at Mickle Well Park should instead be allocated since it is more appropriate in terms of flood risk, landscape and heritage and highways implications.</p> <p>The respondent considers that the Daventry North East SUE should be deleted and substituted by a Daventry South East SUE together with other smaller sites [unidentified].</p> <p>The respondent considers Paragraph 13.26 should include wording consistent with that used in 12.68 requiring 'sympathetic treatment of development at the country park edge'.</p> <p>The respondent considers Paragraph 13.25 should make reference to the fact that the reservoir is designated as a Conservation Area and is a designated Local Nature Reserve.</p> <p>The respondent considers Policy D3 should not specifically state 420 place primary schools where Policy T3 just refers to primary schools.</p>

Policy/ Section	Page No.	No. of Reprs	Summary of the Main Issues Raised by the Representations
			<p>The respondent queries why reference is made to provision of 'local employment opportunities' whereas Policy T3 is specific about the number of jobs.</p> <p>The respondent considers clarity is required on the form of the A45 improvements and cost as without this the full implications of the Daventry North East SUE are not taken into account and the plan is therefore unsound.</p> <p>The respondent considers that if Long Buckby railway station is to be part of the transport network it requires a more frequent bus service and as people will still drive to the station more parking will be required.</p> <p>The respondent considers the policy must make provision of for road safety.</p> <p>The respondent considers Long Buckby Road improvements (B4036) should be given priority, and Norton should have traffic calming measures implemented.</p> <p>The respondent considers references to 'phased accordingly' for the introduction of infrastructure is too open ended and should be more precise, detailed and measurable in terms of deliverable constraints.</p> <p>The respondent considers the policy must reflect the need avoid a detrimental effect on the visual landscape around Borough Hill.</p> <p>The respondent considers natural contours of land should be used to determine site boundaries.</p> <p>The respondent considers natural planting for screening should be planted before development takes place</p> <p>The respondent considers waste water infrastructure does not appear to have been adequately assessed.</p> <p>The respondent considers there should be clear and effective boundaries between any</p>

Policy/ Section	Page No.	No. of Reprs	Summary of the Main Issues Raised by the Representations
			<p>development and the village of Norton.</p> <p>The respondent considers Daventry should expand from Daventry Centre, outward and not start from open countryside inwards. To keep "Town Centre" as the Central more developments are needed to the South and Southwest.</p> <p>The respondent considers Agricultural land should be built on as a last resort due to the need for UK food production.</p> <p>The respondent considers "Village Design Statements" should be incorporated into the consultation process.</p>
Policy D4: Supporting areas of Community Regeneration	158	1	<p>The respondent considers the JCS should be sufficiently flexible to allow for areas to be identified for regeneration that are not currently identified, for example where indices of deprivation change over time or places deteriorate over time against such indicators.</p>
Policy D5: Daventry's Transport Network Improvements	160	9	<p>The respondent considers greater clarity is required on how the A45 scheme is expected to be funded, when it is likely to be implemented and the interaction between delivery of the scheme and phasing of development in Daventry.</p> <p>The respondent considers that Paragraph 13.35 implies improvements to the A45 Northampton to Daventry highway corridor arise solely as a consequence of the development of the Daventry North East SUE whereas the need for such improvements does not arise solely as a result of the SUE. The respondent considers Paragraph 13.35 should be reworded to make this clear.</p> <p>The respondent considers reference should be made in the supporting text to the policy to protecting corridors for future advanced public transport system(s), to be defined in the Masterplan and Daventry DPD. The respondent further considers reference to the A45 should be clarified that this means to junction 16 of the M1.</p> <p>The respondent considers a railway station at Weedon should be reinstated.</p> <p>The respondent considers there is poor disabled access at Long Buckby Railway Station and public transport to the station needs to be improved.</p>

Policy/ Section	Page No.	No. of Reprs	Summary of the Main Issues Raised by the Representations
			<p>The respondent considers use of red ways and underpasses should be adopted for the whole of Daventry like Milton Keynes.</p> <p>The respondent considers the cycling network requires improvement.</p> <p>The respondent considers links to DIRFT should be improved.</p>

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 14 - Towcester

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Introduction	161	2	Both representations are supportive of the JCS.
Towcester Masterplan	161	1	The respondent comments that this section needs updating to reflect the final Masterplan
T1: Spatial Strategy for Towcester	162	9	<p>One respondent is seeking a minor amendment to include consideration of surface water management in the policy.</p> <p>One respondent expresses concern that there is no specific reference to the need for investment in Acute Healthcare to meet planned infrastructure growth.</p> <p>Respondents express support for references to the Towcester South SUE and Towcester Racecourse in the policy.</p> <p>Respondents express concern that the route of the bypass remains unclear. Alternative proposals are suggested which would involve a link to the existing Whittlebury junction, avoiding the cost of creating a new junction on the A43.</p> <p>Respondents argue that further evidence is required to demonstrate that the transport infrastructure implications have been fully considered, including the consideration of alternatives, to confirm that the most appropriate scheme has been identified and that infrastructure requirements can be met in a timely manner.</p>
T2: Town Centre and Moat Lane Regeneration Area	164	2	<p>One respondent suggest a minor wording change to last bullet point of Policy T2 so that it would read: [development will provide:] 'The preservation and enhancement of the conservation area and the setting of the town centre's heritage assets.'</p> <p>One respondent seeks a minor amendment to include consideration of surface water management in the policy.</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
T3: Towcester South Sustainable Urban Extension	166	22	<p>Representations from local residents / residents groups raise the following concerns:</p> <ul style="list-style-type: none"> • Scale of growth is totally unjustified; • Unsustainable development which will exacerbate the housing/employment balance; • No realistic prospect of the anticipated level of employment development being delivered; • The development will not be integrated into the town and is too far from the town centre; • Viability of the scheme to deliver physical and community infrastructure is not proven; • Wood Burcote is a separate and distinct settlement and it would be illegal for it to be enclosed by development from the neighbouring town; and • Some of the land earmarked for development is subject to flooding which is not acknowledged in the Flood Risk Assessment. <p>One respondent seeks greater recognition for the designated heritage assets which adjoin the site and the potential setting issues. Additional wording is proposed for inclusion in the policy to deal with the setting of Easton Neston registered park and garden, listed buildings and nearby conservation areas.</p> <p>The provision of A5 Bypass is a consistent theme raised by respondents with the following key issues being raised:</p> <ul style="list-style-type: none"> • Reliable funding should be in place before the SUE is confirmed. • The promoted road line has not been subject to consultation and alternatives have not been considered. • The Towcester Transport Study has not been completed or published for public scrutiny. • The optimal route for the bypass has not been chosen. An alternative is promoted which would link to the existing Whittlebury junction, provide the missing slip roads for Silverstone and other villages and open up additional land for economic development. • Concern is expressed that the provision of the bypass and traffic restraint in the town centre will have a substantial impact on the A43. It is essential therefore that all the implications have been fully considered and that infrastructure requirements can be met. <p>One respondent is seeking changes to the proposal for a new town park to make it clear that it requires enabling housing and transport development to make it happen. The owners of the</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>land support the creation of the park but object to its designation as Strategic Green Space. They are seeking changes to wording to reflect their view that the site provides an important linkage between the town and the SUE, but is not a focal point for the development itself.</p> <p>One respondent supports the policy relating to the Towcester SUE but is seeking the following focused changes:</p> <ul style="list-style-type: none"> • The policy should not restrict the rate of delivery to a cap, or ceiling, of 1500 dwellings, as additional dwelling completions may take place during the plan period; • The capacity of the site should be “up to 3,000 dwellings”; • The policy should not seek to cap the job numbers during the plan period and the policy should use the area of land to be provided rather than job numbers in line with the other SUEs; • The floorspace allowance for convenience retail should be increased to 2500 sqm; • Town Park is not required in the respondent’s view as part of SUE and should be promoted as an entirely separate proposal; • Reference should be made to comprehensive development and realistic contributions to infrastructure delivery having regard to viability; • Reference to enhanced utility provision is not justified; and • T3 should refer to provision of ‘sites’ for schools, other contributions are still subject to negotiation. <p>Respondents seek greater flexibility towards retail development on the site including the deletion of the 500sqm floorspace limit.</p> <p>Respondents are also promoting the allocation of additional land to the south and west of the SUE, including land at Burcote Wood Farm, and Green Lane Nurseries.</p> <p>One respondent considers that the policy should refer to the specific inset map on which the SUE boundaries are shown.</p> <p>One respondent suggests the following wording change: ‘The development should mitigate its impact on the transport network through measures including:’</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
T4: Transport Improvements for Towcester	169	2	<p>One respondent considers that the first bullet point should include connectivity to Brackley and surrounding communities.</p> <p>One respondent supports the reference to the A5 bypass.</p>
T5: Towcester Racecourse		3	<p>One respondent notes that the site is almost entirely within the Grade II* registered park and garden and as a consequence the following changes to the policy are sought:</p> <ul style="list-style-type: none"> • Specific requirement for a development brief to be prepared; • Bullet point 5 to be strengthened to ensure that the significance of the heritage assets is not adversely affected, including a consequential change to bullet point 6; and • The supporting text should include additional wording to reflect the significance of the heritage assets which are affected. <p>One respondent supports the inclusion of the policy, but is seeking the following changes to the policy and supporting text to provide greater flexibility:</p> <ul style="list-style-type: none"> • Inclusion of a specific objective to acknowledge the opportunity to create a regional or national facility; • The requirement to meet 'all' the criteria should be replaced by meeting 'any of the following criteria'; • Other forms of development which support the future of the racecourse should be considered; and • Access should be primarily from the A5, but not exclusively.

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 15 - Brackley

Policy/ Section	Page No	No of Reprs	Summary of the Main Issues Raised by the Representations
Introduction	170	1	One supportive representation. No significant issues raised.
Brackley Masterplan	170	4	<p>One respondent considers that Brackley is unsuitable for and cannot sustain the proposed developments for the following reasons:</p> <ul style="list-style-type: none"> • The secondary school is oversubscribed; • Existing roads cannot take the increase in traffic; • Few jobs are available; • There are numerous empty shops which previous development has not helped; • Views of local residents have not been considered; and • The document is factually untrue and does not reflect the lack of infrastructure. <p>One respondent considers that capacity and congestion issues on the A422 should be referred to in this section.</p> <p>One respondent notes that the section requires updating to reflect the final masterplan.</p>
High Speed Rail	172	0	No representations received.
B1: Spatial Strategy for Brackley	173	9	<p>One respondent expressed concern regarding the absence of any recognition of the historic importance of the town centre. They consider that the text should encourage heritage led regeneration in the town centre and the following wording should be added to the third bullet point of the policy: 'Development in the town centre should conserve its historic character.'</p> <p>A respondent promoting an alternative site to the west of Brackley considers that the proposals are not the most appropriate strategy for the town when considered against reasonable alternatives. They claim that the SA is flawed.</p> <p>One respondent claims that there is a shortfall in housing provision in Brackley of 700 dwellings which should be met either by allocating one or more additional SUEs or by reallocating part of the requirement to the rural area.</p>

Policy/ Section	Page No	No of Reprs	Summary of the Main Issues Raised by the Representations
			<p>A minor amendment is sought by one respondent to include consideration of surface water management in the policy.</p> <p>One respondent expresses for the policy which identifies the town as a focus for growth.</p>
B2: Brackley East Sustainable Urban Extension	174	9	<p>The following wording is proposed by a respondent for inclusion within the policy: 'Archaeological and ecological assessment of the site and required mitigation.'</p> <p>One respondent broadly supports the policy relating to the Brackley East SUE, but is seeking the following changes:</p> <ul style="list-style-type: none"> • The policy should recognise that permission exists for the employment area to the north of Turweston Road and the remainder of the area should be allocated for housing. • There is no evidence to suggest why the site will not come forward until 2021-2026. A planning application has been submitted and the development will create links to the rest of the town that the northern SUE will rely on. It should therefore be brought forward early in the plan period. <p>One respondent considers the policy is sound provided that bus provision is adequate. They assume that the Highways Agency have been consulted and commented regarding impacts on the A43, M40 and A34.</p> <p>One respondent proposes following minor wording change: 'The development should mitigate its impact on the transport network through measures including.'</p>
B3: Brackley North Sustainable Urban Extension	176	8	<p>The following wording is proposed by a respondent for inclusion within the policy: 'Archaeological and ecological assessment of the site and required mitigation.'</p> <p>One respondent is seeking the deletion of the Radstone Fields component of the Brackley North and its replacement with a residentially led mixed use scheme for West of Brackley. The respondent requests that these changes should be made through a review of the SA and consequential changes being made in advance of any examination. It is submitted that the key argument to support the inclusion of Brackley North SUE is the provision of a link to Northampton Road which will facilitate access to the strategic road network which makes the Brackley North SUE less sustainable than development to the West, and that this has not been</p>

Policy/ Section	Page No	No of Reprs	Summary of the Main Issues Raised by the Representations
			<p>properly considered through the SA.</p> <p>One respondent supports the policy on the grounds that the site represents the most logical and well related option for an SUE.</p> <p>Respondents are seeking greater flexibility towards retail development on the site including the deletion of the 500sqm floorspace limit.</p> <p>One respondent considers the policy is sound provided that bus provision is adequate. They assume that the Highways Agency have been consulted and commented regarding impacts on the A43, M40 and A34.</p> <p>One respondent proposes following minor wording change: 'The development should mitigate its impact on the transport network through measures including:'</p>
B4: Transport Improvements for Brackley	178	3	<p>A respondent promotes an alternative site to the west of Brackley and considers that the proposals, including Policy B4, are not the most appropriate strategy for the town when considered against reasonable alternatives. They claim that the SA is flawed.</p> <p>One respondent supports the policy, but suggests that the policy needs an emphasis on public transport links serving the town and local villages to Oxford, Banbury, Bicester, Buckingham and Northampton.</p> <p>One respondent considers the policy is sound provided that bus provision is adequate. They assume that the Highways Agency have been consulted and commented regarding impacts on the A43, M40 and A34.</p>

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 16 - Rural Areas

Policy / Section	Page No	No of Reps	Summary of Main Issues Raised by the Representations
Introduction	179	11	<p>Respondents support the content of the JCS in relation to the rural areas.</p> <p>Respondents consider that there should be explicit recognition of the status of the village of Great Houghton as a discrete village within Northampton Borough.</p> <p>One respondent considers that whilst the section acknowledges the need to increase housing supply in rural areas, the failure to define a settlement hierarchy is criticised for failing to address shortfall in housing provision in Daventry District, in particular.</p> <p>One respondent is concerned that the last two sentences of Paragraph 16.4 are misleading regarding the amount of power that will be available to rural communities.</p>
R1: Spatial Strategy for the Rural Areas	182	125	<p>The overall approach set out in the policy is supported by a significant number of Parish Councils, community groups and local residents.</p> <p>There are however concerns raised by community representatives which are summarised below:</p> <ul style="list-style-type: none"> • Concerns regarding the % growth limits specified in the policy – some consider that they are too large and would allow villages to growth beyond their service capacity. Also concerned that they have not been justified by evidence; • A more sophisticated approach is required taking into account criteria such as the ability of a village to remain sustainable, the local demand for housing and environmental constraint; • The definition of a hierarchy based on service provision should be dropped in favour of a more 'ad hoc' approach looking at villages where population growth could provide new facilities; • More flexibility should be given to local communities to determine which services and facilities are most important for their area, and to decide the levels of growth that are

Policy / Section	Page No	No of Reprs	Summary of Main Issues Raised by the Representations
			<p>appropriate;</p> <ul style="list-style-type: none"> • The explanatory text focuses too heavily on service provision as the key determinant of the hierarchy. This is inconsistent with the policy which specifies other factors; • Greater emphasis should be given to the role of communities in determining the hierarchy and the policy approach needs to be consistent with the provisions of the Localism Bill; • Concern is expressed that residents do not know which category their village will be in, and respondents also set out reasons why individual villages should or shouldn't be in a particular category; • The policy should ensure that development is permitted <u>only</u> where this meets local needs and supports local services; and • Some concern that aspects of the policy may be too restrictive in terms of meeting the needs of rural areas. <p>There is also a body of representations from the development industry and landowners which challenge the soundness of the policy approach. Specific criticisms focus on the absence of a hierarchy, the use of percentage targets, and the use of the 2006 base date. These are considered in more detail below.</p> <p>Absence of a hierarchy The failure to specify which villages fall into which category in the hierarchy is criticised by respondents for the following reasons:</p> <ul style="list-style-type: none"> • They consider that the housing requirement for the rural areas specified in Policy S3 will not be delivered; • Core strategies should identify the principal locations for growth which includes the 'primary' and secondary service villages; and • Respondents are seeking the inclusion of specific settlements within the named hierarchy. <p>Use of percentage targets These are criticised by respondents on the following grounds:</p> <ul style="list-style-type: none"> • Respondents think they are arbitrary and unjustified and should be deleted;

Policy / Section	Page No	No of Reps	Summary of Main Issues Raised by the Representations
			<ul style="list-style-type: none"> • It is not clear how they have been derived based on the housing requirement specified in Policy S3; • A more sophisticated approach is sought by respondents; e.g. one which is based on the availability of land, demand for and viability of new housing, the environmental capacity of the village, and community consultation on appropriate levels of growth; and • The policy should be more flexible regarding the circumstances in which the % target could be exceeded. <p>2006 base date:</p> <p>The use of this base date is challenged by respondents for the following reasons:</p> <ul style="list-style-type: none"> • It is not justified by evidence; • It is 'out of date' and will not help bring development forward in the future; and • The base date should be consistent with the anticipated adoption date of the plan. <p>Other criticisms of the policy from respondents include:</p> <ul style="list-style-type: none"> • The restrictive nature of the policy which fails to meet the challenges facing rural areas as specified in the supporting text; • Not consistent with national policy due to the absence of a positive and proactive approach based on evidence; • Too much emphasis on the role of local communities which is likely to restrict development; • Will result in inadequate provision of housing in the rural areas at least in the short to medium term; • The reference to saved policies is inflexible, contrary to national policy and unnecessary; • The criterion for the settlement hierarchy fails to acknowledge the need for a sustainable balance of homes and jobs and the importance of developing those settlements with potential to achieve that balance; • Concerns regarding the use of the terms 'small scale' and 'local need' on the grounds that they are not defined and will restrict development; and • Policy should recognise the economic benefits of renewable energy.

Policy / Section	Page No	No of Reprs	Summary of Main Issues Raised by the Representations
R2: Rural Economy	185	15	<p>Whilst there is a large measure of support for the policy in principle, the majority of representations are seeking changes which would provide greater flexibility and / or suggest the inclusion of additional forms of development within the policy.</p> <p>The key changes sought by respondents to the policy are summarised below:</p> <ul style="list-style-type: none"> • The policy should seek enhance not just sustain the rural economy; • Greater flexibility is sought from the policy to permit residential re-use of rural buildings in accordance with national policy; • The policy should not restrict the expansion of businesses in their existing location. Expansion should be permitted for new firms in rural areas not just existing businesses – specific reference is made to Shacks Barn Farm, near Towcester; • The extension of rural buildings should be permitted as well as their re-use; • It is not necessary for diversification to contribute to the operation and viability of the farm holding; • Concern that the wording is too restrictive, specifically the use of the terms ‘small scale’ and ‘local need’, and may be used to prevent employment development. Use of the term ‘small scale’ is not consistent with national policy; • Reference should be made to ‘live/work’ which is a particularly important and growing trend in rural areas; • The use of land for the development of renewable energy facilities should be supported. This is particularly important for farm diversification; and • Should include support and protection for village facilities and local economic needs.
R3: A Transport Strategy for the Rural Areas	186	12	<p>Respondents offer some support for the policy, particularly the provision of ‘demand-led’ services, improving connections between villages and their nearest services and measures to reduce ‘rat-running’.</p> <p>Respondents consider that the policy should promote better information about transport. Accessibility should include access to information. It should also promote connections with places of employment.</p> <p>Respondents question the effectiveness of the policy in the light of Northamptonshire Country Council’s budget cut to transport subsidies and the impact this will have on rural bus services.</p>

Policy / Section	Page No	No of Reprs	Summary of Main Issues Raised by the Representations
			<p>The following improvements to transport facilities are suggested by respondents:</p> <ul style="list-style-type: none"> • Re-opening of Roade rail station; • Intermediate rail station at Brackley; • Bus interchange at Towcester; and • Improvements to disabled access at Long Buckby Station and associated public transport improvements. <p>Specific concerns are raised regarding the capacity of the A43 corridor at Moulton.</p> <p>Respondents question the ability of the local authorities to improve connectivity and obtain funding is questioned. Particular concern is expressed regarding the A45 Flore-Weedon Bypass.</p> <p>One respondent claims that the excessive traffic experienced by villages such as Nether Heyford is not given significant weight in the document.</p>

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Section 17 – Monitoring and Implementation Framework

Policy/ Section	Page No.	No. of Reps.	Summary of the Main Issues Raised by the Representations
Introduction	187	4	<p>One respondent considers that the Pre-Submission version of the Joint Core Strategy should contain a clear statement that infrastructure should be installed before major or cumulative development takes place.</p> <p>One respondent considers that the Pre-Submission version of the Joint Core Strategy should be supported by an up-to-date SHLAA document which the JPU have had sufficient time to prepare. This should inform the over-arching plan document, specifically help to identify the sites available to meet local housing requirements.</p>
Funding and Delivery	188	4	<p>One respondent considers that there is a lack of discussion within the Pre-Submission Joint Core Strategy regarding the funding and infrastructure constraints that may make the Daventry North East Sustainable Urban Extension undeliverable in the plan period. The respondent's view is that an increased burden on the road network from the development should be quantified in the Joint Core Strategy to fully show the implications of development, when infrastructure improvements are essential and when contingency measures will need to be triggered if site proves undeliverable.</p> <p>One respondent considers that the delivery of required Strategic Road Network improvements should be noted as a significant challenge, with no Highways Agency funding envisaged in the plan period. The respondent considers that a high degree of importance should be placed on Paragraph 17.7 in the Joint Core Strategy given the importance of developer contributions or possible local public sector funding sources to deliver essential schemes.</p>
Monitoring the Plan	188	4	<p>A respondent suggests minor changes to include the referencing of the quotations in Paragraph 17.8.</p> <p>One respondent considers that there is a lack of clarity on housing delivery due to uncertainty around provision of extensions in Daventry and a lack of contingencies or certainty about what level of development will be provided through the Strategic Housing Land Availability Assessment (SHLAA). The respondent considers that the full housing trajectory and the Strategic Housing Land Availability Assessment information should be provided within the Joint Core Strategy.</p>

Policy/ Section	Page No.	No. of Reps.	Summary of the Main Issues Raised by the Representations
			A respondent raises concerns that the level of development proposed is a fundamental change in approach and departure from present policy from one supporting a growth area to one seeking to ensure only natural change is accommodated.
Housing Trajectory	190	1	The respondent considers that housing trajectories and site delivery schedules for individual districts should be included as part of the Joint Core Strategy to help calculate 5 Year Land Supply position.

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 18 – Appendices

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
Appendix 1: Plans and other Strategies taken into account in the preparation of the Joint Core Strategy	192	0	No Representations Received.
Appendix 2: Evidence Base for the Joint Core Strategy	195	5	<p>One respondent considers that the Sustainability Appraisal provides an inadequate assessment of the potential negative impacts on historic environment; Appraisal tables and Table 7.2 do not identify any of these negative impacts.</p> <p>One respondent considers that there are cases where negative impacts on historic environment should have been identified such as Policies C6 and T5, and where it may be difficult to reconcile the amount of new development proposed with areas' designation as a registered park and garden.</p> <p>One respondent comments that it is stated that Roade Masterplan have been completed in 2010 but when the Joint Core Strategy consultation opened it had not been finalised or adopted.</p> <p>One respondent comments that the evidence base lists the Strategic Housing Land Availability Assessment which is still work in progress and highly controversial due largely to its emphasis on greenfield sites with no regard for current policies; some sites are in, or immediately adjacent to, conservation areas and special landscape areas.</p> <p>One respondent considers that it is unfortunate that the final version of Strategic Housing Land Availability Assessment is yet to be completed. Respondents would like confirmation that previously made representations to the Strategic Housing Land Availability Assessment regarding the unsuitability of potential sites around Great Houghton at the draft stage have been</p>

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>properly considered.</p> <p>One respondent considers that the following should be added to the evidence base list:</p> <ul style="list-style-type: none"> • Towcester Transport Study; • South Northamptonshire Council's Transport Strategy; • South Northamptonshire Council's State of the District Economy 2009; • South Northamptonshire Council's State of the District Economy 2010; and • South Northamptonshire Council's Economic Development Strategy. <p>A respondent considers that the 5 Year Land Supply Assessment should be 2010.</p> <p>A respondent comments that the Brackley, Roade and Towcester Masterplans completion dates should be 2011.</p>
Appendix 3: West Northamptonshire Housing Trajectory	198	0	No Representations Received
Appendix 4: Infrastructure Schedule	201	25	<p>The following comments have been received in relation to specific elements of the Infrastructure Schedule:</p> <ul style="list-style-type: none"> • One respondent considers that adding up the costs for Northampton North leads to the conclusion that developers would pay almost £34,000 per house. No developer could afford such an approach. • One respondent considers that 40,000 new homes will lead to a bigger shortfall in open space provision when a shortfall already exists. As most green infrastructure proposals are only of tertiary importance and are unlikely to come into existence, we are left with the prospect of more high density housing squeezed onto greenfields. • One respondent does not consider specified costs and timing of delivery associated with many of the items currently set out in Appendix 4 relating to Daventry North East SUE is sufficiently robust or substantiated.

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<ul style="list-style-type: none"> • Respondents consider that healthcare issues are only resolved at a local level, consisting of health centres and doctor/ dentist surgeries. Provision of new or extended hospital facilities is not covered. • A respondent considers that in relation to Page 201 of the JCS the infrastructure schedule is incomplete as the source of funding is not secure and lacks the evidence base as to realistic cost. It is linked to specific developments and does not identify the cumulative effective on the infrastructure and the overall cost of that infrastructure, e.g. the North West Bypass. • A respondent questions that in relation to Item L5 in the West Northamptonshire Infrastructure Schedule whether this a realistic sum of money (£59.63m) to expect developer contributions to fund? Respondents question given that the Infrastructure Delivery Plan was published in February 2011 and the Pre-Submission Joint Core Strategy was approved for publication in January 2011, how was the Infrastructure Delivery Plan evidence used to inform the Joint Core Strategy? A respondent questions that Northampton West South Sustainable Urban Extension section has no contributions for road infrastructure listed - what about road safety improvement to the busy commuter/ "rat runs" north and south of site? • One respondent considers that Appendix 4 is not deliverable in respect of the requirement for a new primary school to be provided as part of the Northampton South Sustainable Urban Extension (Item G2 in the West Northamptonshire Infrastructure Schedule). • One respondent requests clarification in relation to Policy N5 that requires a 'contribution' towards off-site primary school provision, whilst Appendix 4 suggests a school might be provided on-site. • A respondent considers that clarification is sought as to whether the required infrastructure provision for Northampton South Sustainable Urban Extension is based on the 1,000 dwellings indicated in Policy N5. The respondent requests clarification because Appendix 4 is stated to be based on the Infrastructure Delivery Plan which indicates that Collingtree (assumed to be the same location) has a capacity for 2,200 dwellings. The respondent considers that clearly, a materially larger scheme would have greater implications for

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>physical, social and other infrastructure. The respondent considers that accordingly, the matters identified in Appendix 4 may be incorrect even if Bovis Homes' objection to increase the size of the allocation to accommodate up to 1,400 dwellings is accepted.</p> <ul style="list-style-type: none"> • A respondent considers that in relation to Towcester it is noted that: <ul style="list-style-type: none"> • In Policy T4 for example, the bypass is to be funded by the Highways Agency and Northamptonshire County Council whilst all negotiations to-date have consistently placed responsibility for funding in the first instance with developers; • Secondly, it has been agreed that the secondary schooling required by development is significantly less than 6 form entry but the County Council wish to have the option to build a 6 form entry, or larger; and • Thirdly, whilst noted that the town park has a tertiary status, it is established that this is aspirational and not necessary for the main scheme developer to provide this. • One respondent considers that the entry in the West Northamptonshire Infrastructure Schedule for the Grosvenor Centre is factually incorrect. The respondent states that whilst the new Bus Interchange is integral to the Grosvenor Centre development, the developer is not responsible for funding or to procure the new bus interchange as it is to be provided and funded by the public sector. It is suggested that the Infrastructure Delivery Plan should be amended as such. • One respondent considers that in relation to Northampton North Sustainable Urban Extension Item I2 in the West Northamptonshire Infrastructure Schedule outlines a 2 x 2 form entry primary school as being funded by developers and the County Council. Northampton North in itself would generate the requirement for these two schools and it is understood that the level of growth being planned for would not result in significant increases in children of school age. Respondents are concerned that the costings attributed to some infrastructure items have not been subject to a suitable level of scrutiny and are unsound. • A respondent considers that in relation to Northampton King's Heath Sustainable Urban Extension Item J1 in the West Northamptonshire Infrastructure Schedule: <ul style="list-style-type: none"> • A new road link from the A428-A5199 is identified within 0-3 years of first dwelling completions; however it cannot be established that any such road must be constructed

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<p>within the first three years following any completion.</p> <ul style="list-style-type: none"> • Secondly, the respondent considers that the Infrastructure Delivery Plan attributes Item J16 (a secondary school) as being funded by developers and the County Council. Respondents consider that it should be clear that Kings Heath, by itself would not require a secondary school. If the school is required to meet needs arising from the development of other sites that this must be made clear. • Thirdly, the respondent considers that in relation to the timing for Item J14 (Dallington to Kings Heath road improvements under Northampton King's Heath Sustainable Urban Extension) in the West Northamptonshire Infrastructure Schedule any link between Dallington and Kings Heath at 2015 can only be arbitrary at this stage. <ul style="list-style-type: none"> • The respondent considers that Item K4 (Park and Ride Facility under Northampton North of Whitehills Sustainable Urban Extension) in the Schedule mistakenly states the park and ride facility related to Buckton Fields is to be provided on A508 corridor. In fact the facility is to be provided at the junction between Welford Road (A5199) and Brampton Lane. • The respondent questions, in relation to Item AE2 (Public Transport under Daventry International Rail Freight Terminal), whether constraints or conditions are being imposed on the businesses taking on Daventry International Rail Freight Terminal units to utilise the Motorways and not the A361, A5, A45 as these roads are not appropriate for increased Heavy Goods Vehicle traffic. <p>The following comments have been received in relation to more general aspects of the Infrastructure Schedule:</p> <ul style="list-style-type: none"> • The respondent questions whether the Infrastructure Delivery Plan has been updated to take account the reduction in housing provision now proposed in the JCS. • The respondent considers that the Infrastructure Delivery Plan should clearly set out a current view of critical infrastructure required to deliver the Joint Core Strategy and suggest it is not currently clear which infrastructure is critical to delivery of the Joint Core Strategy and which is merely desirable.

Policy/ Section	Page No.	No. of Reprs.	Summary of the Main Issues Raised by the Representations
			<ul style="list-style-type: none"> The respondent is concerned that in relation to Secondary School Provision the plan should make adequate provision for secondary schooling as currently the Joint Core Strategy makes provision for only one secondary school at Northampton which appears light relative to level of housing proposed. The respondent requests that this matter be kept under review as the plan develops.
Appendix 5: Saved Local Plan Policies to be replaced by Joint Core Strategy Policies	223	3	<p>The respondent does not believe that Saved Northampton Local Plan policies E1, E7, E9 and E39 have been adequately addressed by the Joint Core Strategy policies which are supposed to replace them (i.e. Policies BN2, BN5, S10 and S11).</p> <p>The respondent considers that the remaining Northamptonshire County Structure Plan Policy SDA 1 (Strategic Development Area Proposals) which includes development at Towcester should be on the list of policies to be replaced by the Joint Core Strategy.</p> <p>The respondent considers that in regard to large scale development at Dallington Heath and North of Whitehills the Joint Core Strategy appears merely to have accepted them as commitments derived from old style development plans. The respondents consider that saved development policies in old style development plans should be subjected to utmost critical scrutiny as to the current circumstances rather than merely be treated as commitments because of their presence in the old style development plans.</p>
Appendix 6: West Northamptonshire Monitoring Framework	228	1	<p>The respondent considers that changes should be made to the indicators on the National "Heritage At Risk Register" so that all designated heritage assets are included rather than Grade I / II* only. The respondent considers that the indicator should also recognise that not all heritage assets were assessed in 2006, so the target should be revised to achieve a decline in assets at risk since assessment began.</p>

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 19 – Glossary of Terms and Abbreviations

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Glossary of Terms and Abbreviations	250	0	No Representations Received

Summary of the Main Issues Raised by the Representations to the Pre-Submission version of the West Northamptonshire Joint Core Strategy

Section 20 – Maps and Key Diagram Index

Policy/Section	Page No.	No. of Reps.	Summary of Main issues Raised by the Representations
Figure 1: West Northamptonshire Context Map	261	0	No Representations Received.
Figure 2: West Northamptonshire Key Diagram	262	4	<p>Respondents recommended that additional information be depicted in Figure 2, including:</p> <ul style="list-style-type: none"> • A Strategic Employment Site allocation should be denoted at Houghton Gate; • The symbol for DIRFT Policy E4 on the Key Diagram should be relocated to reflect the correct location of DIRFT III (west of the Motorway and north of Junction 18); and • A plan should also be included within the JCS showing the location and extent of the DIRFT III strategic development opportunity site. It was also a resolution of the West Northamptonshire Joint Strategic Planning Committee held on the 31st January 2011 that a map of DIRFT was provided to accompany the Submission JCS.
Figure 3: West Northamptonshire Key Diagram Enlargement	264	1	The respondent recommends that the A428 be shown north of Northampton.
Figure 4: Northampton Related Development Area Map	265	3	<p>Respondents seek clarification of the term: 'Greenspace associated with the SUE' and recommend this be amended to 'as part of the SUE'.</p> <p>The respondent seeks clarification regarding the legend and that it should make it clear that the road line for the North West Bypass is indicative.</p> <p>Respondent considers that a Strategic Employment Site allocation should be denoted at Houghton Gate.</p>
Figure 5: West Northamptonshire Proposal Map	266	6	Respondents consider that the maps do not deal with green infrastructure in West Northamptonshire. It is felt that such a map would aid an overview of where wind farms might best be sited.

Policy/Section	Page No.	No. of Reps.	Summary of Main issues Raised by the Representations
			<p>Respondent considers that the maps are dominated by constraints i.e. flood zones, minerals safeguarding areas, nature conservation areas, etc. In addition, Figure 5 only shows locations of inset maps rather than any actual development or other proposals.</p> <p>Respondent considers that most Inset maps show Mineral Safeguarding Areas from the adopted Minerals and Waste Development Framework Core Strategy and refer to them in the legend accordingly. The JCS however does not explain what the Mineral Safeguarding Areas are and the role they perform.</p> <p>Respondent considers that a Strategic Employment Site allocation should be denoted at Houghton Gate.</p> <p>Respondents disagree with part of Towcester South SUE being identified as Strategic Green Space on the grounds that no robust evidence exists to justify this position. Respondent supports the development of housing and connections on the site but consider that the designation of part of the land as Strategic Green Space designation would be inconsistent with residential development.</p>
Inset 1: Brackley North SUE and Inset 2: Brackley East SUE	267 and 268	1	<p>Respondent considers that the standard legend on all the inset maps could cause confusion if none of the elements are depicted on the maps.</p> <p>Respondent considers that the colour tone of the mineral safeguarding area is the same colour tone as all the SUEs on Figure 4, whereas the SUEs on the inset maps are left without a colour tone. Respondent considers that this is confusing and the notations ought to be consistent.</p> <p>Respondent considers that unless there is a proposal to extract any mineral reserves within a SUE prior to any development proceeding, it is unnecessary to show the designation within the SUE boundary.</p>
Inset 3: Towcester South SUE	269	2	<p>Respondent disagrees with part of Towcester South SUE being identified as Strategic Green Space on the grounds that no robust evidence exists to justify this position. The respondent supports the development of housing and connections on the site but consider that the designation of part of the land as Strategic Green Space designation would be inconsistent with residential development.</p>
Inset 4: Towcester	270	0	No Representations Received

Policy/Section	Page No.	No. of Reps.	Summary of Main issues Raised by the Representations
Racecourse			
Inset 5: Towcester Centre & Moat Lane Regeneration Area	271	0	No Representations Received
Inset 6: Daventry North SUE	272	3	<p>Respondents recommend that the Inset Map 6 under Figure 5 be amended to include another red line which depicts the Monksmoor Farm site.</p> <p>Respondent seeks additional clarity regarding the approach to be taken to addressing the Minerals Safeguarding designation on part of the SUE site in the planning application process.</p> <p>Respondent express concern that the Local Nature Reserve is not depicted on the map despite being shown on the legend.</p>
Insets 7 - 13: Northampton Inset Maps showing SUE locations	273 - 279	8	Respondent seeks clarification regarding the allocation of 'approved in principle' in respect of Upton Lodge and Norwood Farm should not show development west of the new Link Road – this is unsound. There is opposition to residential development in the area of Upton Lodge/ Norwood Farm to the west of the new link road. It is thought that it is a clear intention to reserve this land as an extension to the country park therefore this area should be shown as green on the diagram to avoid doubt and or change of planning policy within the plan period.
Inset 8: Northampton Kings Heath SUE	274		Respondent considers that the line of the Northampton Related Development Area disappears. They feel that the map needs to be improved in cases where lines run together in order that they can still be seen.
Inset 10: Northampton North SUE	276		Respondent draws attention to the point that Crowfields Common Local Nature Reserve is not notated on the plan. They feel that the line of the Northampton Related Development Area disappears.
Inset 12: Northampton South SUE	278		Respondent considers that the allocated site includes a large area of land which is existing public open space and is shown on the attached plan (coloured green). This was provided to meet the needs arising from the existing development at East Hunsbury and in particular that area to the south of Rowtree Road and east of the railway line. They feel, therefore, that it would be totally inappropriate for this public open space to be counted as part of the structural greenspace to be provided as part of the Northampton South SUE. The existing public open space should be deleted from the allocated area as edged red.
Insets 14 – 15:	280, 281	0	No Representations Received

Policy/Section	Page No.	No. of Reps.	Summary of Main issues Raised by the Representations
Brackley Business District			
Figure 6: West Northamptonshire Green Infrastructure Networks	282	1	Respondent considers that the title refers to 'Networks' whereas the legend refers to 'Corridors'. The respondent feels that this needs to be clarified.