

West Northamptonshire Joint Core Strategy

Emergent Joint Core Strategy Consultation July – September 2009

Officer Responses to Representations for the Joint Strategic Planning Committee 31 January 2011

1. Introduction to the Emergent Joint Core Strategy

- 1.1 The Emergent Joint Core Strategy was published on 31 July 2009 for a consultation period which ended on 30 September 2009. The content of the Emergent Joint Core Strategy was informed by the Joint Core Strategy Issues and Options (September 2007) and Regulation 25 (January 2009) consultations, the collection of a wide ranging evidence base and on-going work with technical bodies such as the Environment Agency.
- 1.2 The Emergent Joint Core Strategy marked a fundamental step towards the submission and adoption of the Joint Core Strategy. The Emergent Joint Core Strategy set out thinking at the time of its publication with respect to the policy approach that should be taken in West Northamptonshire and was based on the evidence collected to date. It was not a draft plan or final strategy; it did not set out policies but it did set out the policy approach and the preferred options and rejected options for the locations of growth at each town in West Northamptonshire.
- 1.3 The Emergent Joint Core Strategy sought to explain the thinking of the Joint Strategic Planning Committee at the time of its publication and offered a chance to make comment. It included a questionnaire containing 54 questions on which responses were sought.
- 1.4 As a result of the Emergent Joint Core Strategy consultation 4,781 individuals and organisations submitted 6,355 responses containing a total of 120,668 individual comments, also known as representations

2. The Purpose of This Document

- 2.1 This document sets out the response to the representations received to the Emergent Joint Core Strategy. For each question the document summarises the number of representations received, and breaks these down in terms of representations of support, objections and general comments. It then presents a summary of the key issues raised in objections and general comments which generate the need for a response. The issues raised in supporting representations are not included in this document. A full summary of all the issues raised in representations was reported to the Joint Strategic Planning Committee on 26 July 2010 and is available on the Joint Planning Unit's website: www.westnorthamptonshirejpu.org.
- 2.2 For each question a 'Joint Planning Unit Response' is provided which outlines how the representations have been considered and have informed the development of the policies which now appear in the proposed Pre-Submission Joint Core Strategy. For each question a recommended action is included indicating how the particular topic covered by the question should be addressed in the Pre-Submission Joint Core Strategy.

3. Frequently Used Abbreviations

- 3.1 The following abbreviations are commonly used within the document:

AMR – Annual Monitoring Report
AA – Appropriate Assessment
CIL – Community Infrastructure Levy

CIP – Cultural Investment Plan
DPD – Development Plan Document
EJCS – Emergent Joint Core Strategy
GI – Green Infrastructure
IDP – Infrastructure Delivery Plan
LDF – Local Development Framework
LDS – Local Development Scheme
NCAAP – Northampton Central Area Action Plan
PSJCS – Pre Submission Joint Core Strategy
RSS – Regional Spatial Strategy
SA – Sustainability Appraisal
SCI – Statement of Community Involvement
SELA – Strategic Employment Land Assessment
SFRA – Strategic Flood Risk Assessment
SHLAA – Strategic Housing Land Availability Study
SHMA – Strategic Housing Market Assessment
SNEAP – Sustainable Northamptonshire Economic Action Plan
SPD – Supplementary Planning Guidance
SuDS – Sustainable Urban Drainage Systems
SUE – Sustainable Urban Area
WNJPU - West Northamptonshire Joint Planning Unit
WNELS - West Northamptonshire Employment Land Survey

Question 1

Question - Do you support the vision?

Summary of Representations

Total	Support	Object	Gen. Comments
2562	123	2416	23

Summary of issues raised by objectors

- This is a long-range vision and will need to alter in the subsequent years.
- Does not cover the whole area and contains factual inaccuracies. Northampton does not need to be called a city to be great.
- Too general and lacking in specific details for future generations. It will lead to a reduction of living standards for both existing and new residents
- Not distinctive, does not relate to local areas and cannot be achieved by the strategy within the document.
- Too parochial and lacks vitality with big ideas being missed and does not see the area in its broader context, its relationship with North Northamptonshire and the area beyond.
- Too urban focused and weak on the role of rural areas. It does not recognise that the villages are capable of supporting growth to help support rural services
- This is little more than a vehicle for the development industry and their profit driven agenda and would promote Northampton's expansion into a city which would engulf surrounding villages is not accepted.
- Needs to focus on how to make places work better and should tell a story and should make reference to the successful delivery of SUEs as the key to its delivery.
- Fails to effectively relate to the existing characteristics of the area and the key challenges set out in the Spatial Portrait and it is not consistent with the strategy i.e. Climate Change and the construction of a new road. The vision should refer to wildlife and biodiversity.
- The vision should include reference to revitalising historic assets.
- Does not include a substantive community plan for safety, social capital, community cohesion and spiritual as well as physical well-being, voluntary and community sectors and thriving faith communities,.
- This is more of a statement of the current position as opposed to a vision for the future.
- Ensure the vision statements are not in conflict. Diverse employment opportunities" might impact on the "green spaces network", and the outward growth of settlements will impact on "beautiful tranquil villages and rolling landscapes".
- Clearer links between the West Northamptonshire JCS spatial vision and the vision within the NCAAP is needed and the vision should be more closely aligned to the objectives of the Sustainable Communities Strategies.
- The vision should be more realistic and explicit about the problems faced, e.g. parking issues, loss of environment, and housing conditions that are the most cramped in Europe

- The vision should refer to the orbital routes around the town [Northampton] allowing people to access employment and facilities otherwise people in the north will be cut off from employment in the south
- The vision should contain less jargon and the tense should be conditional.

Suggestions

They contend that we must examine where Northampton is failing to provide in general terms, and what people find attractive elsewhere in order to achieve the vision. It is insufficient to think that by expanding the population so that it may be called a city is a ready-made solution. The present proposal does nothing to answer the questions of how other towns have made the transition to a city. It was suggested that the vision should promote an attractive riverside town, with niche shops and small businesses and the following alternatives visions were put forward

“To regenerate and reinvigorate Northampton as a vibrant riverside market town with a distinctive local character linked to a wide and attractive rural hinterland, a diverse range of housing and communities, an interesting and distinctive cultural offer”.

“That Northampton becomes a regenerated and reinvigorated vibrant riverside market town with a really distinctive character of its own with good quality housing and infrastructure catering for all members of a diverse but integrated community, linked to a wide and attractive rural hinterland. The Town Centre of Northampton would have a number of suitably sized and varied retail outlets and cultural attractions accessible to all who wanted them. Communities will be genuinely sustainable.”

“Northampton Town centre will be the focus for mixed used development but well located edge of urban centre sites and adjacent areas also has a role in accommodating future development needs to maximise the regeneration benefits of development and enhance the district’s overall urban environment.”

Joint Planning Unit Response

Vision is about taking the present as a baseline for preparing the ground rules for the future. The JCS is for a 15 year period and there is scope for regular review of the vision and the objectives set out in the plan.

There was no intention of factual inaccuracies and the use of the word city is statement of aspiration and should not be misconstrued. The prospect of Northampton becoming a city by 2026 cannot be ruled out.

The vision evolved through due process of consultation and engagement and has considerable support.

The vision does not conflict with the objective of Sustainable Community Strategy and there is a clear link between the West Northamptonshire JCS spatial vision and the vision within the NCAAP. The two Plans complement each other and their objectives are closely aligned and have been prepared in accordance to government guideline.

The overall spatial approach of the JCS is to concentrate development in the main settlements where there are relatively adequate levels of services and infrastructure to support development. The policy approach is supported by national policy. However there is no presumption against appropriate development in the rural areas. The balance of consideration in determining how much development should be allowed in the rural area is the level of local need and the ability of the area to accommodate development in a way that does not undermine the overall strategy for the area and the need to protect its rural nature.

The JCS seeks to protect historic environment and through the promotion of high design standards ensure safety, community cohesion and as well as physical well-being. Detailed strategy for implementing matters of social capital, spiritual well and thriving faith communities are not a matter for the JCS.

The issue of using plain English is recognised and is being addressed in an ongoing manner.

The suggested alternatives are noted but these are not considered to offer better solution.

Recommended Action

No fundamental change to the vision is required.

Question 2

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

Summary of Representations

Total	Support	Object	Gen. Comments
1376	135	1610	15

Summary of issues raised by objectors

- The objective should be more spatially specific and the aspirations of each of the towns further defined.
- The planned growth is unsustainable and takes insufficient account of sustainable development (the urban area of Northampton needs rejuvenation first).
- Planned growth should be delivered within the key settlement areas, however further planned growth should be provided for within the smaller rural settlements, such as West Haddon and Passenham.
- The amount of development required by the plan will destroy the ancient market town of Northampton, the countryside and communities and allow development to extend into the greenbelt and have negative effects on a number of villages and is too dramatic in one bit hit.
- Growth will require sensitive management in terms of locations for new development and management of town centres which need to be based on an understanding of the historic environment.
- Northampton has not managed to integrate the development in the 80s and 90s, let alone anything more. The town already received more than its burden of population growth in the past 40 years, totally out of keeping with the area's ability to sustain the population in terms of commercial and industrial activity.
- Regeneration of Northampton will never occur and people are much more likely to commute to enhance the growth of other places like Milton Keynes.
- Further development should only be permitted if it is appropriate in scale and does not impact on the character. Explore the scope for development linked to farm diversification and small rural shopping and craft developments.
- The balance of growth between Northampton and the smaller towns of Daventry, Towcester and Brackley is questioned. Too much is being focussed on Northampton. They should have equal shares in the growth.
- The proposed development can never be integral to Daventry as it is separated by Borough Hill on one side and the Reservoir on the other. The development proposed in the Parish of Norton will result on the destruction of productive farmland, wildlife habitats and historical sites.
- Existing infrastructure is inadequate even for the present population before an increase in dwellings and no clear guide that the highway infrastructure will be built to make growth sustainable.

- Concerned that in the past growth and commensurate infrastructure have never been efficiently managed and doubt the ability to deliver and fund the amount of new infrastructure required.
- Infrastructure (roads, public transport, recreational, retail) must be in place combat existing and future problems associated with traffic growth before or at the beginning of the development process. These issues should be addressed in advance.
- The requirement for housing growth is overstated and the provision identified within the Plan appears to be in line with the population increase and housing requirements detailed in the Milton Keynes and South Midlands Sub Region Health and Social Care Services Provision for the Future. It is considered that Swan Valley can assist in delivering the employment requirements as it is an important strategic location.
- The large numbers of empty homes and brownfield sites should be filled first and new housing should be on brownfield sites in the north of England where the jobs are needed. Provision should also be made for low cost and selective starter homes on a limited scale for the younger generation in their own locality and should be provided in towns and villages and rural settlements where the infrastructure is already in place. This would reduce the need to commute and create a more social environment for new and existing residents prevent rural settlements from stagnation.
- Concern about flood dangers and management of pollution.
- This will only bring about gigantic boxes amongst office blocks.
- There are no employment prospects in Northampton unless it is to do with 'sheds' (warehousing) which thrive in Northampton. Towcester and Brackley have little labour requirements.
- The unique characteristics of Silverstone should be recognised as well as its strategic role in delivering balanced sustainable employment and housing growth alongside infrastructure.
- The growth targets contained within *the* East Midlands Regional Plan are not being met. The strategy should not constrain employment growth in the area, consider the findings of Strategic Employment Land Assessment (SELA) and Strategic Northamptonshire Economic Action Plan (SNEAP) in terms of jobs growth and should not align with the East Midlands Regional Plan.
- The suggested growth in the Emergent JCS is no longer required due to the economic downturn. The Regional Spatial Strategy (RSS) growth requirements and population predications are inaccurate. It is too high and should be reduced through the RSS review.
- Brackley and its links to rail, health and shopping are more related to Oxfordshire than to Northampton.
- The objective does not acknowledge Daventry's role as a sub-regional centre.
- The figures for the Northampton Implementation Area should be amended to coincide with the RSS figures. Change the figures from 43,000 to 40,375. The core strategy must be in conformity with the RSS.
- The JCS should set out realistic and deliverable local figures which can be fully explored and debated at the public examination.
- Milton Keynes should not be used as a model for development and Northampton should not be linked with Milton Keynes, Luton and Daventry.

- There is insufficient land identified to meet the *RSS* employment figures, the inclusion of Silverstone would help to rectify this inconsistency. The absence of a Strategic Housing Land Availability Assessment creates some uncertainty about the availability and deliverability of the estimated housing yield within the existing built up area.
- Make reference to all strategic employment sites and show all growth options on the Key Diagram.
- Reappraise the goals set by central government and identify sites that are more suitable for easy and less costly redevelopment.
- Sustainability Appraisal which is considered to be fundamental did not form part of the Consultation.

Suggestion

A new town was suggested as a much better solution.

Joint Planning Unit Response

The strategy for planned growth reflects Government policy and accords with the requirement to accommodate further development in a sustainable manner. The obligation is to meet the identified need within West Northampton which means that sufficient land has to be made available.

The strategy will encourage the reuse of empty homes and give priority to the re-use of brownfield land, but the need for development is such that a portfolio of sites is required. This means that greenfield land will have to be released alongside brownfield sites.

The overall spatial approach of the JCS is to concentrate development in the main settlements where there are relatively adequate levels of services and infrastructure to support development. The policy approach is supported by national policy. However there is no presumption against appropriate development in the rural areas. The balance of consideration in determining how much development should be allowed in the rural area is the level of local need and the ability of the area to accommodate development in a way that does not undermine the overall strategy for the area and the need to protect its rural nature.

Housing provision figures take account of needs and the amount of projected numbers of jobs to be created over the plan period. It is essential to provide the mix of units and good quality housing and the approach is to promote housing growth across the whole area. Amongst other things the aim is to ensure a thriving economy and reduce homelessness in West Northamptonshire, for both present and future generations.

The JCS seeks to protect historic environment and through the promotion of development in the most sustainable location and maximising the use of brownfield land and by taking advantage of existing services and infrastructure. The Core Strategy identifies and establishes a settlement hierarchy using a methodology that accords with government advice. This enhances the ability to programme development in a way that takes account of the character of the rural area. It is therefore case the Core Strategy enhances rather than detract from the amenity of the rural areas.

The growth figure in the RSS area derived from assumptions made prior to the current economic recession. It is therefore necessary to reassess the growth options. In deciding the level of growth and the amount of housing required The Core Strategy takes account of the implementation and delivery of infrastructure and the likely actions of the developers who are the main providers. Our best estimate is that the market is unlikely to recover sooner and the performance of the housing market does not support the level of growth at the level contained in the RSS. The reduced level of housing in the Core Strategy is justified by evidence from SHLAA and housing need assessment.

The Key Diagram is an important part of the final Core Strategy document. It will diagrammatically illustrate the spatial strategy set out within the document. As much as possible it represents a composite view of development opportunities and the broad location of where major development will occur. There is no reason to suggest that it should identify every proposal of policy.

The JCS recognises the role of strategic employment sites including Silverstone. Sufficient land is being allocated for variety of employment and this will enhance the necessary economic growth.

The JCS has been informed by Sustainability Appraisal at every important stage of its preparation and the process being followed accords with Government advice and guidance.

The suggested new town as an alternative solution noted but this is not consistent with Central Government policy and it is also considered to be less sustainable compared to proposed policy options in the JCS.

Recommended Action

The objective should be revised to make it more spatially specific and to reflect the aspirations of each of the towns as suggested. Amend objective 1 as in: objectives 5, 6, 7, 8 & 11 of the PSJCS.

Question 3

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

Summary of Representations

Total	Support	Object	Gen. Comments
2157	811	1327	19

Summary of issues raised by objectors

- The objective is unclear and completely unrealistic and it does not set out a clear investment strategy, policy or initiative for knowledge based or environmental industries and no detail on how this can be achieved without public funding.
- Warehouse development must be resisted. Employment growth will not be in the Transport and Logistics industry which will not provide the sufficient salaries to support home ownership.
- The significance of West Northamptonshire's position internationally as opposed to other regions and technology development envisaged are not clear. Northampton cannot exploit its position internationally as it has no status or link internationally.
- Growth should be contained and revitalisation of the area needs to be considered before growth. Many towns within the area are already overcrowded.
- Employment growth in Northampton declining over the past ten years and specialist knowledge based industries in the area have recently declined. This situation could worsen following the cessation of (Formula One) F1 at Silverstone.
- Growth should be organic it should not force unnatural demands or be to the detriment of the current farming and agriculture land.
- Policy should be focused on sustainability and employment growth is reliant on huge housing growth which is unsustainable and will encourage a large uptake of greenfield land.
- Development must not be at the detriment of the County's assets, particularly the rural areas and settlements.
- The Objective is just an excuse for pointless international trips by WNJPU executives.
- Creative industries should be included in the Objective.
- There are more appropriate areas within the UK and internationally where knowledge based industries and environmental technologies would be more suited.
- Distribution requires a good road system although very little new road building is proposed.
- Storage and Distribution (B8) development should be restricted and diversification away from this would be beneficial to the local economy and

likely to have less impact on the landscape and reference should be made to increasing value-added (higher salaried) jobs.

- Leisure and culture businesses must be included.
- Invest in skills and technologies that already exist and increase the knowledge base – motor sport industries, Daventry International Rail Freight Terminal (DIRFT) and credit card offerings.
- Knowledge based industries and environmental technologies is far too restrictive and potentially damaging to future economic growth. The JCS must remain flexible and encourage employment development across all uses.
- Provision a variety of suitable and viable employment sites and opportunities which include both B Class, non B mixed-use regeneration scheme should be considered favourably to encourage competition and stimulate economic activity.
- Improved transport links within West Northamptonshire and to areas beyond its boundaries must be sought. No detail has been provided to explain how this will be achieved.
- Guaranteed funding for infrastructure is needed. Developer finance should not be relied upon.
- Brackley should exploit its location and become a high quality cultural environment for people in the 21st century. The capacity of Brackley as a future science centre has been underestimated.
- Any employment initiatives should ensure crime prevention measures are considered at the outset so that areas are safe places where businesses want to locate. Northamptonshire Police should be involved.

Suggestion

The Objective is too biased toward knowledge based industries and environmental technologies. A more balanced approach should be taken which accounts for existing and potential warehouse and distribution industry and the large numbers of people within the local area working within this sector (including the associated managerial and skilled support staff).

Policy restricting warehouse development is required. Failure to succeed in this area will result in a reduction in living standards and employment will not be guaranteed.

The Objective should be delivered through SUEs on greenfield sites and the recognition in the Strategy of the role of these sites to attract inward investment.

It was contended that the word 'exploit' does not fit within the context of the document. The words *'take advantage of West Northamptonshire's position'* are preferred.

Joint Planning Unit Response

The intention of the Objective is to place West Northamptonshire on the map in a global economy. However there is scope for making the Objective clearer. The JCS will ensure that development takes place in sustainable manner by maximising the use of brownfield and only using greenfield sites where appropriate.

There is no need for a dichotomy between growth and regeneration as is being implied. The JCS tries to balance the need for regeneration against the strategy for growth in the area. It is not a case of one or the other, both are important for the future of West Northamptonshire.

Whilst acknowledging the low job density provided in warehousing, it nevertheless serves a vital purpose to the overall economy. Its location is important and the JCS will ensure that all developments are appropriately located in the line with Sustainable Principles that underpin the Plan.

The plan is for a 15 year period and it is not envisaged that the recession will continue indefinitely. Even if that were to be the case the plan will be monitored and past trend is by no means a reliable yard stick for judging future performance. Specialist knowledge based industry has made significant contribution to the local economy. It is appropriate for the JCS to make provision for its growth.

Whilst acknowledging that there are areas within the UK and internationally where knowledge based industries and environmental technologies abound these do not preclude us from tapping the potential offered by West Northamptonshire.

Recommended Action

The Objective should be made clear by articulating the different aspects under different headings. Objective 2 in Emergent JCS should therefore be replaced by two new objectives 8 and 9 in the PSJCS which address most of the concerns.

Question 4

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

Summary of Representations

Total	Support	Object	Gen. Comments
1486	163	1308	15

Summary of issues raised by objectors

- Proposals in the Plan do not meet the objective and lacks evidence to back it up. The document gives no detail of what will be required, how much it will cost or how it will be funded.
- There are serious doubts about the provision of essential infrastructure including cultural, healthcare and education facilities
- Planning obligations to provide health, education, leisure facilities to serve new developments must accord with the tests set out in Circular 05/2005. Listing infrastructure needs by type (such as education and health) gives the impression that other types seem less important and there is nothing in the strategy that allows for new hospital facilities for Northampton
- The proposed developments are in conflict with Objective 3 as the engulfment of outlying villages would destroy their essential spirit and community identity which makes them what they are.
- Linking existing communities physically means destroying ancient and distinctive villages – this is vandalism on a massive scale. Communities are strongest when they have a clear identity.
- It is essential that services are in place at the earliest opportunities.
- The linkages between new and existing communities should be maximised through the provision of joint facilities where possible.
- Specific reference to sport should be included. The use of the terminology Planning Policy Guidance Note 17: Open Space, Sport and Recreation throughout the document would be of use as would an indication of what is envisaged by community facilities.
- Provision for young people needs to be more than just play areas.
- Smaller developments within villages would bring facilities closer to their customers, reducing the need to travel and helping the environment.
- The loss of school playing fields and sports facilities has been ongoing and a backward step.
- The existing social facilities are not provided to all communities like the Somali community who have no community centre or mosque.

Suggestion

The word 'training' should be added.

Joint Planning Unit Response

The development of the JCS is ongoing and the proposals and policies included are designed to lead to the attainment of the overall vision and agreed objective.

Policy advice and government guidance provide the basis for this Objective and there is clear evidence of a shortfall in the provision of infrastructure in the area. An Infrastructure Development Plan (IDP) is being prepared as part of the JCS and this will provide the mechanism for policy implementation. There is no evidence that this objective is out step with the spirit of Circular 05/2005.

The IDP informs the infrastructure requirements related to delivering the growth strategy identified in the Plan and links the delivery of infrastructure to the phasing of development. The overall approach is consistent with Government advice and best practice and the policy direction is appropriate and logical.

The list of infrastructure in the Objective is not intended to be definitive but may be misconstrued as indicated by objectors. This point is well made and the Objective will be modified accordingly.

The JCS incorporates the principle of good design as outlined in PPS1 and seeks to minimise the impact of development on local character. The proposed development strategy is based on a framework settlement hierarchy which allows different areas to accommodate development in a sustainable manner. There is no evidence that this Objective will encourage development that will harm outlying villages or destroy their essential spirit and community identity.

The JCS will contain policies that will ensure adequate provision of essential community facilities including those meeting the needs of young people and the IDP will ensure their delivery and funding. There is no need to add the word training to the Objective but the wording could benefit from slight modification.

Recommended Action

Modify Objective by removing the list of specific types of infrastructure. The revised objective is now included as objective 2 in the draft PSJCS.

Question 5

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

Summary of Representations

Total	Support	Object	Gen. Comments
1498	502	979	17

Summary of issues raised by objectors

- National planning policies already provide a strong 'town centre first' focus without precluding non-town centre development.
- Locating shopping facilities in the town centre and district centres creates an imbalanced society as local people have to travel into an already congested town to buy their essentials.
- Sustainable modes of transport are entirely unsuitable for people who wish to carry home a week's groceries from the town.
- Given the scale of growth proposed it is inevitable that new out of town shopping centres will be required when homes are being built on the periphery. This raises the possibility of future District Centres.
- Traditional town centre sites cannot provide the retail facilities suitable for a wide range of traders.
- Profit led development cannot be directed to where it doesn't want to go. Retailers should be free to find their own market place.
- Some retail development, such as garden centres, builder's merchants and DIY stores, are not suited to town centres.
- This policy places unjustified restrictions on A2 uses (e.g. banks, estate agents).
- Northampton Town Centre is physically incapable of coping with large numbers of people because of its old market town design.
- Town centres and villages outside Northampton may suffer due to a focus on development within Northampton.
- Priority needs to be given to making the centre attractive and Town Centre regeneration should not be at the expense of helping villages to be more sustainable.
- Needs a balance between retail, leisure and living spaces in town centres.

Suggestion

It was suggested that the objective is too inflexible and should be amended to recognise that "**in some instances, retail development may be appropriately located in non-town centre locations**". Planning Policy Statement 6: Planning for Town Centres emphasises the importance of local shopping centres to meet people's day-to-day needs and should be the focus for more accessible local services, such as health centres and other small scale community facilities. The words '**most appropriate**' were also considered to be too vague. The Objective according some could be rephrased to ensure the existing areas of non-town centre retail such as Sixfields are not being disadvantaged.

Joint Planning Unit Response

The need to direct and concentrate growth and retail activities in the main settlements and town centre is supported by government policy as well as sustainable development principles. The objective reflects this without prejudice to the need for appropriate scale of development in the lower ranking settlements. The scale of growth proposed has been tested through the planning process and the requirements for additional facilities and services are part of the consideration. There is however no evidence that a new District Centre is required as being suggested.

The JCS incorporates the principles of sustainable development and the level of development apportioned to different areas is based on the needs of local communities and future potential for growth. There is no evidence that Northampton Town Centre is physically incapable of coping with the proposed growth.

Whilst acknowledging the need for services to be close to residents, unrestrained market forces are likely to create further imbalance. Individual aspiration or the dictate of the market is not an ideal mechanism for dealing with community needs. The proposal that retailers should be free to find their own market place is a recipe for waste and inefficiency which the free market cannot put right.

There is nothing in this Objective or the JCS in general that could put an area such as Sixfields at a disadvantage. On balance it is felt that the Objective would benefit from major redrafting in order to meet the concerns expressed and to reflect new evidence from further studies, partners and the representations. The JCS incorporates the principles of sustainable development and the level of development apportioned to different areas is based on the needs of local communities and future potential for growth. There is no evidence that Northampton Town Centre is physically incapable of coping with the proposed growth.

Recommended Action

Amend Objective 4 - The objective has now been redrafted as appears in the PSJCS draft, objective 5, 6 & 7.

Question 6

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

Summary of Representations

Total	Support	Object	Gen. Comments
1889	140	1725	24

Summary of issues raised by objectors

- The term “strategic green infrastructure” is planning jargon and uses of the words ‘green infrastructure network’ which “dumbs down” the terms ‘countryside’ and ‘landscape’.
- The Objective is not specific enough and does not provide enough detail on the mechanisms to achieve
- It only supports a green infrastructure network to allow for urban sprawl to subsume 15 villages.
- Requires a clearer definition of sustainable development principles
- The Objective is contradictory as building on greenfield land will not safeguard the green infrastructure network. It is difficult to understand how any green infrastructure can be safeguarded and enhanced by concreting over the countryside in order to build 18,000 new houses and the required infrastructure.
- Green infrastructure does not work, even in rural areas as the use of public or green transport is based on economic viability. It is costly, largely unnecessary and managed green corridors do not make up for a loss of natural countryside
- Villages should be independent and connections with neighbours encourage crime and antisocial behaviour and do not want formal concrete cycling lanes as they attract crime
- There is already a network of bridleways and footpaths used for recreational activities and funds should be deployed in greening existing infrastructure rather than creating more unnecessary infrastructure.
- Concern that the recession will affect the ability to deliver the infrastructure needed to make good communities and there is a high land requirement of housing which may impinge on the provision of green networks.

Suggestion

It was suggested that Infrastructure Delivery Plan will need to set out what green infrastructure will be delivered, when it will be delivered and by whom. It was also suggested that major consideration needs to be given to safe, secure cycle networks linking villages to Brackley. Green infrastructure should include the restoration of the Grand Union Canal which connects Buckingham, Thornborough, Deanshanger, Old Stratford and Cosgrove to Milton Keynes. Care must be taken to ensure that new ‘green’ connections are sensitive to the areas in which they are located

Joint Planning Unit Response

Green infrastructure is important particularly in an urban area as the quality of the surrounding environment can contribute significantly towards the creation of sustainable communities and improve quality of life. High quality and well connected green infrastructure has the potential to make an area a more attractive and healthier place to live, work and play, with multiple benefits for the economy, the environment and people.

The term sustainable development has been used for more than two decades and is recognised internationally as a pattern of resource use that aims to meet human needs while preserving the environment so that these needs can be met not only in the present, but also for generations to come. The JCS will provide a definition in the glossary.

Evidence has suggested that West Northamptonshire's towns and rural areas are connected by a network of green spaces and this is what is regarded as 'strategic green infrastructure'. There is no reason why more traditional terms such as countryside and landscape could not be used in the JCS, but 'Green Infrastructure' is a term recognised in national planning policy. The use of plain English is acknowledged and as far as possible the document will be simplified to make it user-friendly.

There is no evidence that connecting places through network of open spaces, bridleways and footpaths would lead to increase in crime. The impact of the recession is important but should not lead to a do nothing option. The plan is for a 15 year period and it is not envisaged that the recession will continue indefinitely. Even if that were to be the case the plan will be monitored and the objective can be changed if there is need to do so.

The JCS will provide a definition of sustainable development as part of the glossary of terms and the objective is being revised to take account of comments and new evidence.

Recommended Action

Amend Objective 5. - The objective has now been redrafted as appears in the Pre-Submission draft, objective 2 & 14.

The glossary has been extended and the language in the plan simplified. The user-friendliness of the JCS has been enhanced and can be developed further in terms of its presentation as it progresses to a submission stage document.

Question 7

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

Summary of Representations

Total	Support	Object	Gen. Comments
1123	821	291	11

Summary of issues raised by objectors

- Filling in spaces between communities will undermine sustainability, result in loss of village identity, enforced urbanisation of village communities, social stress and congested roads.
- Large scale development at villages would be inconsistent with the Regional Spatial Strategy (RSS).
- The objective is unclear and could be better defined by stating what is meant by ‘key rural community’.
- This objective should not differentiate between rural communities, it must be the choice of rural communities where they want to grow
- The sustainable policy approach should not result in a destruction of local character and community spirit
- People do not need to be encouraged to live and work in rural areas.

Suggestion

It was suggested that rural communities are best sustained through the redevelopment of brownfield sites within village confines and by adding small to medium sized extensions to include affordable housing., this will revitalise schools, post offices, churches and social clubs and strategic infrastructure will not be required as this type of expansion will be distributed across the whole area. They should have a defined minimum threshold of facilities to qualify. Rather than encouraging rural communities to be more sustainable places the words ‘and facilitate’ should be added after ‘encourage’.

Joint Planning Unit Response

The aim of this Objective and the overall approach to development in the JCS is to concentrate new development in the most sustainable locations. This increases the scope to maximise brownfield site and the reuse of land for development. It is believed that this approach will allow scope for the protection of local character.

The JCS incorporates the principle of good design as outlined in PPS1 and seeks to minimise the impact of development on local character. The proposed development strategy is based on a framework settlement hierarchy which allows different areas to accommodate development in a sustainable manner. There is no evidence that the approach adopted is inconsistent with the Regional Spatial Strategy (RSS).

Whilst acknowledging the choice and right of individual community to have a say in the planning and development of an area, it is reckless to consign rural communities to unrestrained market forces. Individual aspiration or the dictate of the market is not an ideal mechanism for dealing with community needs.

The JCS will provide a framework for development in rural areas to ensure that the type and scale of development is consistent with local needs and the character of the area. This approach will allow scope for local communities to bring forward schemes to meet their needs in a sustainable manner whilst at the same time maintaining the essential local and rural character of the area. The framework for the rural settlement hierarchy has been defined in the draft PSJCS and this should help clarify any ambiguity.

Recommended Action

Amend Objective 6 – The issue about the clarity of the Objective is noted and it should be redrafted. Consequently the objective has now been redrafted as appears in the PSJCS draft objective 12.

Question 8

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

Summary of Representations

Total	Support	Object	Gen. Comments
2451	186	2246	19

Summary of issues raised by objectors

- The term ‘sustainable’ is ill-defined and maligned and there is no such thing as sustainable development and there is a need to understand what a sustainable community should contain
- Development should be constrained so that it will not have an adverse impact on existing communities.
- Sustainable development principles have not been financially quantified and reducing the use of the car would result in constraining development.
- It is more sustainable to develop brownfield sites rather than the countryside and sustainable means infrastructure first.
- Need to make existing buildings more sustainable should mean control of development and working with the existing conditions, population and physical features of an area.
- This can only be achieved by concentrating development close to the centre of Northampton.
- This is too expensive and developers can not afford it and so the housing will cost more.
- This objective is not locally specific and there is no proof that the “vision” is sustainable and building new roads is contradictory to this Objective.
- Don’t believe developers’ claims that their development is sustainable and how can building houses without garages be sustainable?
- Protection and enhancement of historic environment is integral to sustainable development.

Suggestion

It was suggested that all communities should be sustainable, not just rural areas. The pattern of land-use is paramount to achieving a sustainable plan and employment should be located where it will help contribute towards sustainable development.

Joint Planning Unit Response

The difficulty of a clear definition of what is meant by sustainable development is acknowledged. However the term has been used for more than two decades and is internationally recognised as a pattern of resource use that aims to meet human needs while preserving the environment so that these needs can be met not only in the present, but also for generations to come. Further clarification will form part of the Glossary of Terms in the Appendix.

At the heart of sustainable development is the need to conserve energy and mitigate the effect of climate change by lowering CO2 emission. This can best be achieved by ensuring that new development takes advantage of existing services and facilities thereby reducing the need to travel. It is proper and appropriate for the JCS to include an objective that supports the principle of a settlement hierarchy. This does not preclude development in smaller settlements but ensures that this would be modest and geared towards meeting local needs and supporting existing communities and services.

The Objective enables and promotes Northampton as the main focus for development and promotes development that takes account of infrastructure such as public transport and road improvement where necessary.

The requirement to embrace sustainable development principles is imperative and the benefits far outweigh the cost in terms of social, economic and environmental gains. It enables resources to be deployed in a reasonable manner and allows the location of appropriate development.

The JCS reflects the key objectives and priorities of sustainable development with a clear agenda to concentrate the majority of the development in existing built-up areas. Sensitivity to the protection and enhancement of historic environment can be achieved whilst providing much needed new development.

The development of major sites require associated infrastructure including road improvements are as important as control of development and working with the existing conditions, population and physical features of an area. There is no merit in treating the urban and rural areas as museum items which should be kept in the same condition at all cost. Policies should recognise the need to protect or enhance built and natural assets and the need for additional development of high quality of design.

The issue of housing with or without garages is not strategic and is not be a matter for the JCS.

Recommended Action

Amend Objective 7 - The objective has now been redrafted as appears in the PSJCS draft, Objective1.

Question 9

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

Summary of Representations

Total	Support	Object	Gen. Comments
1903	1109	788	6

Summary of issues raised by objectors

- Surrounding towns and villages with “urban sprawl” will not achieve the protection and enhancement of the built and cultural assets of Northamptonshire.
- The plans contained within the Emergent Joint Core Strategy will destroy the area’s heritage.
- The track record of the Council and West Northamptonshire Development Corporation has been appalling and respondent has no confidence in their ability to put this objective into practice.
- Tourism is not sustainable or needed and this is not a priority and that money could be better spent elsewhere
- No detailed plans, costing or evidence have been provided to support this objective.
- Churches are key built and cultural assets, and church yards are also an important quiet space and wildlife resource.

Suggestion

It was suggested that this Objective should be carried out in a sensible way, with affordable housing tying in with the buildings of the area. This can be done with great thought and agreement with all communities involved for generations to come. It was also argued that where cultural and built assets are identified in close proximity to potential development sites, the degree to which these assets would require protection should be considered in conjunction with the importance of the proposed development.

Joint Planning Unit Response

The JCS through its vision, objectives and policies, is intended to provide clear messages about the commitment to environmental and cultural assets. The approach being adopted is not intended to promote urban sprawl but to manage growth in an orderly and sustainable manner. Whilst acknowledging other priorities, the built and cultural assets should be effectively managed. There is nothing in this Objective to suggest that it would have a detrimental effect and no evidence has been provided to link the objective the diminution of existing heritage. Past failures should not be an excuse for doing nothing. Whilst tourism cannot solve all problems it is an essential part of the overall strategy for regeneration and economic growth.

Past achievement or failure should not be an excuse for doing nothing. There is no evidence to support the allusion to past failures. Even if that was to be the case it should be a challenge for trying hard and should not be a deterrent.

The JCS recognises the roles of different community groups including Churches and provides an overarching framework within which these groups can fully participate in planning and development of the area. Policies in the Plan will assist the realisation of community assets including church yards.

PPS4 acknowledges the role contributions of tourism and endorses this as an appropriate employment generating use. Its contribution to local economy should be acknowledged and the development of appropriate policies in the JCS will ensure tourism is fully encouraged and represented in line with Central Government sustainable objectives.

The cost of an objective, for the most part, is difficult to quantify. However the objective embraces sustainable development principles and this is imperative and ill lead to social, economic and environmental gains. No attempt has been made to cost each and every object and there appears to be no requirement to do so.

Recommendation

Amend Objective 8 and change it to Objective 15 in the PSJCS.

Question 10

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

Summary of Representations

Total	Support	Object	Gen. Comments
1376	844	525	7

Summary of issues raised by objectors

- This Objective lacks evidence and it is not clear how the plan will achieve this and the plan gives no indication of how this investment will be made.
- Growth agenda will not lead to higher educational achievement and skills base can be fulfilled without this objective.
- Objective is superfluous or subordinate to others and funding stream for education is outside the Council's control and it is not supported in plan or any part of the development proposals and lack of infrastructure will deter students.
- Education provision at secondary and further education level needs further consideration in the light of development proposals in Brackley and have a stronger focus for West Northamptonshire and be more locally specific.
- Good schools are already over-subscribed.
- Not sure how with the JCS can assist to attract inward investment particularly in the current economic downturn.
- Educational achievement is already catered for in Weedon Bec Parish through the expansion and provision of existing establishments and their ability to adapt to increasing needs, as they have done over the last 40/ 50 years.
- Skills base must be improved before realising this objective and there is a shortage of teachers to teach skills.
- University of Northampton and Moulton College are growing and popular and education is already well funded but monies are not well spent.
- Objective cannot be achieved without increasing the population and ruining the environment.

Suggestion

It was suggested that transport links around existing educational facilities should be improved and skills training should be offered to those who are not academic and more must be done to encourage young people.

Joint Planning Unit Response

The Objective is clear and the intention is to enable further contributions to be made towards the provision educational facilities. The achievements of high standards by existing schools provide a strong magnet for attracting more students and the increase in potential capacity requires additional resources.

The objective is supported by clear policies a further detail on specific requirements is provided in the Infrastructure Delivery Plan (IDP) and a future Supplementary Planning Documents (SPD) will provide guidance on how the Objective will be translated into action.

The plan is for a 15 year period and it is therefore unreasonable to expect the current state of the economy to continue throughout the Plan period. The projected growth and the assumptions made are based on a reasonable prospect of economic recovery but strike a balance and reducing the level of growth when compared to RSS requirements. It is also acknowledged that the approach and the assumptions made will be reviewed from time to time through the Annual Monitoring Report (AMR).

The JCS is based on sound evidence and the policy approaches reflect the key objectives and priorities of sustainable development. The modest increase in population arising as a result of this objective can be absorbed without any detriment to the amenity of the area or the environment.

Recommended Action

Amend Objective 9 and change it to Objective 10 in the PSJCS.

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Question 11

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

Summary of Representations

Total	Support	Object	Gen. Comments
2788	1748	1037	3

Summary of issues raised by objectors

- Objective is unachievable with the proposed growth and climate change is natural and unpreventable. Flood risk and air pollution will increase.
- Objective needs explicit reference to mitigating climate change, minimising use of non-renewable resources, and waste reduction and be better articulated. A more overt approach is required based on minimising greenhouse gasses and an adaption strategy- especially in respect of how flora and fauna can be assisted to adapt.
- Floodplains are not obstacles to overcome but are natural areas of land that serve a specific purpose and there should be presumption against development in flood plains.
- Incorrect data is being used for flood risk modelling and have no faith in the flood risk assessments and zoning that have been carried out in the area.
- Flood prevention has not been sufficiently considered in the plan and new development will worsen air pollution.
- Should include explicit reference to: mitigating Climate Change, Minimising use of non-renewable resources, minimising waste creation and developing economically valuable skills in the above.
- The Exception Test should be applied to allow necessary development to occur within Flood Zones 2 or 3.
- Flood prevention schemes need not only to be built but also maintained and SuDS (Sustainable urban Drainage Systems) are not the panacea and are only useful to decrease surface water run-off
- Consideration should also be given to noise and light pollution.

Joint Planning Unit Response

The apprehension about the risk of flooding is noted and the importance of avoiding development in areas at risk from flooding cannot be over emphasised. This objective is a powerful statement that reinforces the commitment to ensuring that future development does increase the risk of flooding.

Work undertaken with respect to flood risk assessment was carried out by independent professional consultants and there is no evidence of factual error in the data used.

Policies in the JCS will make reference to Climate Change mitigation and other sustainable development measures including: minimising the use of non-renewable resources, and minimising waste creation.

Due consideration has been given to flood prevention and minimisation of climate change and different policies in the plan cover the various aspect of the concerns being raised. SUDs are not a total solution but it does help to reduce the risk of flooding and the JCS will address the issue of ongoing maintenance.

Recommended Action

Amend Objective 10 and change it to Objective 1 in the PSJCS.

Question 12

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

Summary of Representations

Total	Support	Object	Gen. Comments
2546	1775	768	3

Summary of issues raised by objectors

- The process of consultation has been such a failure as to be contemptible and present attempts are insufficient.
- The JPU failed to engage with the general public and young people were excluded and community is not consulted before making judgements.
- The plan is a poor basis for consultation and many of the methods used are inadequate. The questionnaire daunting for the lay person to complete
- Participation was a sham, the public is not listened to and too emphasis has been placed on electronic means of consultation that are inaccessible to many people. The workshops and exhibitions that were organised to explain the plans to the public were not made fully accessible to those most affected
- Concerned that community consultation has been too confined in the 6 week consultation period and over the holiday period. The views of many people including the Parish Council were not considered and not enough was being done to reach the silent components of the communities such as young people.
- All voices, no matter how large or small, need to be given equal weight and the views of the Parish Council are seldom considered and more needs to be done to reach the ‘silent components’ of the communities
- More needs to be done to engage with younger people in the future planning of West Northamptonshire.
- The document is produced by professionals and written in planning jargon and difficult for the layperson to fully understand.

Suggestions

It was suggested that too much consultation can slow the plan-making process. Modern media should be utilised, such as television debate, extensive presentations, blanket and frequent mailings, electronic, postal and phone voting. It was further stated that although public participation is worthwhile, it must be recognised that it is not possible to please all members of a community all of the time. A suggestion was made to add the words “help to” after “can” in the last line of the objective.

Joint Planning Unit Response

The approach and methods of consultation followed Government advice and the response to the public engagement exercise speak for itself. As a result of the Emergent JCS consultation 4,781 individuals and organisations submitted 6,355 responses containing a total of 120,668 individual comments. This is comparable with the level achievement of the best performing local authorities. A variety of

methods were used and the publicity gave opportunity to everyone interested to be involved.

Whilst acknowledging that more could be done it must be recognised in the words of one of the objector's that: *"it is not possible to please all members of a community all of the time"*. Effort was made to avoid technical jargon as far as possible and document continues to be improved to make it user friendly. However it must be recognised that the circumstances surrounding the JCSy make it almost impossible to avoid the use of technical language. However the Glossary of terms which is being prepared as part of the plan will provide further detail of the terms used.

There is no evidence that the consultation was a sham. However, the issue of using plain English is recognised and is being addressed in an ongoing manner.

The issue of community involvement is dealt with in the Statements of Community Involvement (SCI) adopted by the partner Councils. In the light of this it is not necessary for the Core Strategy to include an objective regarding community involvement as this is already an inherent part of the plan making process.

Recommendation

That the Objective be deleted, as this is covered by the adopted Statements of Community Involvement.

Question 13

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

Summary of Representations

Total	Support	Object	Gen. Comments
2013	1461	540	12

Summary of issues raised by objectors

- The scale of housing being proposed is unacceptable. The figure is over-inflated, unsustainable, unachievable and out of date.
- Little, if any, information is provided on the elderly persons housing needs. This should be reviewed before the proposals are advanced.
- Definition of needs must be clarified.
- There is enough quality housing already available in West Northamptonshire. Supply currently outstrips demand
- Housing should be provided in the right location not just positioned to meet government targets.
- Quality housing must be proportionate. At present it is decided at the district level, is developer led and local opinion is ignored or dismissed.
- Quality housing is generally unaffordable housing, yet poor quality affordable housing is unacceptable.
- Affordable housing should not be prioritised, rather, provision should be made available for a mix of rented and sale properties. The principles of equity and affordability must be followed and Eastern District's poor housing stock should be addressed.

Suggestion

It was suggested that brownfield land must be developed prior to greenfield, the sequential approach should be used for all developments. Policies should be more robust to encourage this. The words “our community” should be emphasised and exclude overspill from London and the South East.

Joint Planning Unit Response

The level of housing provision figures take account of needs and the growth in the number of jobs to be created over the plan period. The overall aim is to provide appropriate amount, mix and good quality housing for all. The approach is to promote housing growth across the whole area and to reduce homelessness and ensuring a thriving economy.

Further evidence and research carried out following the publication of the RSS underpins the new housing figures to be included in the PSJCS. The objective recognises the role of all forms of housing including affordable housing and the implementation of the JCS will ensure an appropriate mix of homes including high quality affordable homes.

The suggestion regarding the use of brownfield land is well acknowledged. The JCS is underpinned by the principle of sustainable development and the need to maximise the use of brownfield land. A great deal of care and attention is being paid to the location and development of housing that will ensure that housing provision meets needs rather than reflects the wishes of developers.

Recommended Action

No fundamental change in approach is required. However the objective has been substantially revised to take account of comments made and in the light of new evidence. The revised objective now appears as objective 11 in the draft PSJCS.

Question 14

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

Summary of Representations

Total	Support	Object	Gen. Comments
2896	524	2357	15

Summary of issues raised by objectors

- The Objective and plan are unclear and do not provide clear policies on how regeneration will be achieved. It will not be achieved as access to the town centre is poor and people will go elsewhere
- The plan does not support or make regeneration possible as existing infrastructure does not support this and realising this Objective will require additional money that the Council can only be raise through Council Tax increase.
- Regeneration will lead to over-population and proposing the construction of 40,000 unwanted homes in Northampton 1800 on the outskirts of Northampton will exacerbate existing problems rather than stimulate regeneration.
- Northampton should not take a greater role in West Northamptonshire or the region.
- Regeneration should focus on vibrancy not size and key priorities for regeneration and specific areas for intervention should be set out. Ensure that existing brownfield and urban sites are used before greenfield sites, but this should not occur at the expense of other parts of West Northamptonshire.
- Market demand is for out of town shopping centres and taxes raised from the development of out of town centres should be directed toward restoring Northampton's historic and market town appeal.
- Policy needs to clarify the treatment of retail and other supporting services, including banks and regeneration should also include provision and support for cultural, educational and creative industries.

Suggestion

Whilst the need to regenerate Northampton Town Centre is recognised, the extent of development required to change the character from a rural market town to ‘city’ is not feasible without very careful and sympathetic planning (and hopefully retaining a ‘rural’ emphasis). The deliverability of key regeneration sites in Northampton is critical to realising the overall vision for the area. Existing infrastructure will need to be improved as part of regeneration of Northampton.

Joint Planning Unit Response

The Objective reinforces the commitment to improving and enhancing the quality life of the people of Northampton and West Northamptonshire by seeking regeneration that could lead to economic, environmental and social wellbeing of the residents. Relevant policies and strategies are being developed to assist this process.

In line with sustainable development principles, existing larger settlements offer greater opportunity for using brownfield sites. The amount of development proposed and the specific sites has been tested through Sustainability Appraisal (SA). The scale of growth proposed in the Emergent JCS reflects the level of growth set out in the adopted RSS. In preparing the Pre submission document to Joint Planning Unit has undertaken further work including revised household and population forecasting which supports a lower target than that originally proposed in the RSS.

The JCS is unequivocal about its commitment to the promotion of access for all and improving alternative modes of transport. The town centre provides the most accessible location for development.

Whilst preference for out of centre shopping facilities may be an historical reality, it would not be appropriate for the JCS to perpetrate this. Seeking a more sustainable pattern of development, by directing retail development to the town centre, accords with Government policy.

The JCS will adequately address the issue of retail and make provision for other services in line with PPS4. It establishes a hierarchy of centres and promotes Northampton Central Area as the main focus for major retail activities whilst allowing other smaller centres to accommodate growth, commensurate to their sizes. Policies in the JCS affirm retailing as the prime function of the key frontages, but these do not preclude other supporting services such as banking, education or cultural facilities.

The suggestion is well made and there is no doubt that delivery is a key objective of the plan.

Recommended Action

No fundamental change in approach required. However, the objective has been substantially revised to take account of comments made and in the light of new evidence. The revised Objective now appears as Objective 5 in the draft PSJCS.

Question 15

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

Summary of Representations

Total	Support	Object	Gen. Comments
864	451	23	390

Summary of issues raised by objectors

- Not clear what is meant by regeneration and these towns do not need to be regenerated. Daventry, Towcester and Brackley are not in need of regeneration. What are the implications of ‘regeneration’ for Brackley or Towcester’s? Corby, Kettering and Wellingborough have more to offer.
- Concern that this will require more building and each town may lose its individuality and clear guidance is needed on how these towns can profit from an urban renaissance
- Regeneration should occur in small clusters and be mindful of existing infrastructure. Limited residential development should be encouraged to ensure satisfactory levels of rural service provision.
- There should be a separate objective for regeneration at Daventry with Towcester and Brackley combined with rural areas and historic assets and regeneration of Brackley will only occur when combined with growth of the town
- Separate objective is required for regeneration of rural areas and historic assets, including Weedon Depot, where this is needed.
- Regeneration should not focus solely on retail but should also include uses such as banking, which have a valuable contribution to the vitality and viability of town centres.
- Regeneration will only be achieved if a range of sites for housing, employment, retail and other uses can come forward throughout the entire plan period.

Suggestion

It was suggested that the word “foster” should be replaced with “support”.

Joint Planning Unit Response

Regeneration does not always result in additional housing or physical development. It is appropriate to give consideration to and support a policy objective that is specific and locally focused. Evidence suggests that there are a number of areas within these towns that require investment and renewal and the JCS provides appropriate vehicle for initiating action that would ensure economic, social and environmental benefits.

It is appropriate to have an overarching objective in a strategic document of this nature. The JCS policies will explain the meaning and purpose of regeneration.

The JCS is the overarching vision and the broad objective allows the implementation of regeneration programmes in the different areas and there is no merit in having separate local objective in a plan that covers strategic issues.

The suggestion that regeneration should be in clusters taking account of existing infrastructure is well made. However there is nothing in the objective to suggest a 'one size fit all' approach. Any regeneration initiative will reflect the overall development strategy, local circumstances and the hierarchy of settlement articulated elsewhere in the plan. Demonstrable evidence indicates that there are enough sites to deliver the regeneration objective.

Recommended Action

No fundamental change in approach is required. However the objective has been substantially revised to take account of comments made and in the light of new evidence. The revised objective now appears as Object 4 in the draft PSJCS.

Question 16

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

Summary of Representations

Total	Support	Object	Gen. Comments
1914	155	1744	15

Summary of issues raised by objectors

- Modal shift has not worked elsewhere in the country, with different elements of policies which impact on transport being in conflict. The emphasis on change to non-car modes will create gridlock, noise and pollution and the achievement of this objective is a colossal challenge.
- Public transport is too expensive and its provision is largely dependent on private commercial operators and it is unlikely to meet user's requirements and does not work in sparsely populated areas. It is realistic only for localised areas of community and certain centre to centre journeys
- Promoting non-car modes and public transport should be tried first, before committing major investment. People should be able to choose both the mode of transport and a shift toward public transport will reduce this choice.
- This will lead to inadequate infrastructure to cope with "pollution free" transport and refusal to consider out of town shopping close to residents will make transport less green.
- Major new road infrastructure may impact the historic environment.
- The strategy does not give any details as to what these improvements would entail, how they would be delivered, how much they would cost and who will pay for them. The only detailed transport improvements proposed here is a new dual carriageway and other road developments, which are completely at odds with an 'emphasis on non-car modes' and travel by car is essential and here to stay and you cannot un-invent it and provision for it is therefore essential. Life is unpleasant without cars especially for disabled person who rely on these
- Rural areas cannot be provided with frequent, timely and cost effective public transport and car is essential to successful longer term development of villages.
- New road links are unnecessary. They cost money and would move population and workforce away from West Northamptonshire
- Car use will increase given the lack of employment opportunities around Northampton and people will not walk any further than 500-1000 metres, and less if carrying large objects like weekly shopping which cannot be carried comfortably on public transport. Furthermore, over 50% of the population will not be able to walk long distances by the end of the plan period due to old age.

- Improve rail links, re-open the Northampton to Bedford rail line, add a new railway station to the west rail line in Northampton and introduce an out-of-town rail way station such as East Midlands Parkway.
- Improve rural inter village roads to bring them up to modern standards.
- More roads need to be built; urgent need for the Flore-Weedon bypass and Northampton Ring Road needs to be completed.

Suggestions

It was suggested that walking to and from school should be encouraged and facilitated for health reasons and to reduce car use. A truly integrated transport policy must be adopted that recognises the car as the primary mode of transport in the region. Necessary transport infrastructure investment including Central Government funding will need to be made in advance of development. Consult with key users of cycle tracks and Rights of Way to establish a linked up approach to co-ordinated transport improvements. Subsidise public transport and bring back the vehicle road fund license which had to be spent on improving roads and providing transport should be considered. Additional wording is suggested to include "rural connectivity".

Joint Planning Unit Response

Government advice and the concern about climate change require adequate measures to reduce CO₂ emissions and other environmental impacts of car use. The promotion of other modes of transport through the JCS is a legitimate planning objective and there is no evidence that its application will lead to further environmental social or economic deterioration or harm.

The capital intensive nature of public transport is acknowledged, but it is a worthwhile investment. Neither the Objective nor the JCS is likely to increase pollution as claimed.

The Objective acknowledges the role of the car and does not preclude its use as a mode of transport. The intension is to reduce the frequency, the number of car journeys and the length of travel by car. It also seeks to encourage other more sustainable transport modes such as bus, trail, cycling and walking.

The difficulties of access in the rural areas and the case made for further, better and improved transport links is legitimate and there is scope for meeting this need in the JCS.

Recommended Action

No fundamental change in approach is required. However the Objective has been substantially revised to take account of comments made and in the light of new evidence. The revised objective now appears as Object 3 in the draft PSJCS.

Question 17

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

Summary of Representations

Total	Support	Object	Gen. Comments
1123	843	268	12

Summary of issues raised by objectors

- The objective is too unrealistic, ambiguous, lack details, and is unachievable based on past experience.
- Concern about funding and the risk of flooding and major development proposals which follow a similar 'design layout format' regardless of the specific location.
- Concern about recent housing developments, infrastructure and the impact upon surrounding areas particularly 'affordable' housing which do not enhance the environment.
- Local character and distinctiveness, which is set out in village design statements should be taken into account and Towcester Vale development proposals take full account of this objective and the unique character, identity and the existing pattern of Towcester.
- Towcester and Brackley should retain their market towns' character.
- Avoid high density developments and ensure larger gardens and improved parking.
- Safety of development should be ensured but this should not be to the detriment of exciting design and individuality.
- Townscape character appraisals, similar to Landscape Character Appraisals should be carried out and local people and artists should be involved in the development of design codes.

Suggestion

It was suggested that design would be improved if smaller developments could be influenced by local knowledge and more weight is given to Parish Plans, local character and distinctiveness.

Joint Planning Unit Response

The JCS is based on sound evidence and the policy approaches reflect the key objectives and priorities of sustainable development. Policies in the Plan will ensure that only development designed to a high standard will be promoted or encouraged.

High quality design is at the heart of sustainable development and it is appropriate for this to be one of the centre pieces of the JCS. Good design does not equate to additional cost and past failure should not hinder future attainment. It is important to give a clear message and set down the parameters for future development. The Councils, developers and the public have a part to play and corporate commitment should ensure success.

Issues regarding Townscapes character appraisals are important but can best be dealt with by specific proposals. There is scope within the overall framework of the JCS to prepare other DPDs and SPDs.

The Objective would lead to greater protection of local character and identity and within this framework the Councils will strive to maintain a high standard of design.

Recommended Action

No fundamental change in approach is required. However, the objective has been substantially revised to take account of comments made and in the light of new evidence. The revised objective now appears as Objective 15 in the draft PSJCS.

Question 18

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

Summary of Representations

Total	Support	Object	Gen. Comments
1401	156	1231	14

Summary of issues raised by objectors

- No confidence in the proposals to secure the delivery and lack of detail on infrastructure requirements and sources of funding.
- Infrastructure is more than ‘hard’ infrastructure and the provision should include social, water, waste water and green infrastructure which is required to support the development.
- Infrastructure should be delivered prior or, in parallel development taking place based on past experience suggests that developer contributions have not provided adequate and timely infrastructure
- Current infrastructure deficits require public funding and need to be addressed before contemplating future needs. Development alone should not be the only way of funding infrastructure, is also required
- Concerned about capacity of existing services and facilities, cost lack of funding given the current state of the economy
- Detailed infrastructure plan needs to be provided and development should not be stifled whilst funding is sought from developers and/or infrastructure is secured beforehand.
- This includes flood alleviation mechanisms and green infrastructure.
- Set out the role of all agencies required to deliver infrastructure and measure how they perform
- Developers should only be required to provide infrastructure that relates to their own development.
- Infrastructure needs to be near housing as it is inconvenient to travel long distance.
- The scale of development must suit the infrastructure provided.

Suggestion

It was suggested that Roof Taxes and S106 legal agreements will not deliver timely infrastructure. Central government funding should be provided upfront for vital services, such as roads, sewerage, flood defences, flooding and schools.

Joint Planning Unit Response

An Infrastructure Delivery Plan (IDP) is being prepared which underpins the JCS. The list contained in the objective is by no means exhaustive but provides examples of the type of infrastructure that would be required. This will be defined in detail in the IDP and the relevant policies of the Strategy.

National policy advice provides the parameters for infrastructure delivery and funding and this is being followed in the development of the IDP. The responsibility for the provision of infrastructure does not rest entirely on developers, but it is fair and appropriate that contribution from major development should form an essential part of the funding regime.

The purpose of the IDP is to identify the infrastructure that is required, when it is needed and how it will be delivered and funded.

Recommended Action

No fundamental change in approach is required. However the Objective has been substantially revised to take account of comments made and in the light of new evidence. The revised Objective now appears as objective 2 in the draft PSJCS

Question 19

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

Summary of Representations

Total	Support	Object	Gen. Comments
1895	87	1768	40

Summary of issues raised by objectors

- The objectives are too generic, lacking detail and cannot be considered locally specific.
- The objectives follow national guidance but are not considered within a local context. They are neither location specific nor related to key specific issues, as required by Planning Policy Statement 12: Local Spatial Planning (PPS12). They are not measurable and therefore cannot be monitored.
- West Northamptonshire area is too large to be considered as local in terms of the objectives. Individual towns have differing needs.
- Local circumstances and local issues in rural areas have not been considered or addressed and there is lack of consideration for local circumstances in Northampton South East.
- There is insufficient consideration of the infrastructure needs and this will engineer the decline of the area overall.
- Development is not considered in terms of local circumstances and growth is disproportionate to local needs.
- Objectives centred on large scale urban extensions, it is unlikely this reflects local desires.
- Definition of local circumstances is required.
- More detailed assessment of sites is required to ensure objectives are delivered and guided by local circumstances.

Suggestion

It was suggested that more detailed assessment of sites is required to ensure that objectives are delivered and guided by local circumstances.

Joint Planning Unit Response

The emphasis and orientation of the objectives are guided by the broad vision and the guideline policy advice. They reflect the aspirations of the local people as articulated through discussion and considerable debate with Councillors, stakeholders and the wider community.

The overall approach to the JCS is to formulate policies that reflect and address local issues hence the need to highlight in the plan specific policies dealing with different parts West Northamptonshire. This is evident in PSJCS.

In preparing the PSJCS all of the objectives have been reconsidered to ensure that they are clear, deliverable and relevant to local circumstances.

Recommended Action

Review the objectives to ensure that they are clear, deliverable and reflect local circumstances.

Question 20 - Do you support the overall principle of Option B – focusing growth in a small number of larger development areas?

Summary of Representations

Total	Support	Object	Gen. Comments
2343	105	2206	32

Summary of issues raised by objectors

- Option B will support growth of new towns that are not fully integrated with existing communities, contrary to objectives of sustainable urban extensions.
- Constraints of size, revenue, connections and proximity to locations more suited to transformation will inhibit the elevation of Northampton from a town to a city.
- Development should be accommodated on existing brownfield sites. Based on previous work undertaken by Northampton Borough Council, there is reason to believe that up to 70% of the proposed growth can be accommodated on brownfield sites. Furthermore, Planning Policy Statement 3: Housing requires 60% of housing development on brownfield sites. The remaining 30% could be accommodated around smaller communities or in a small new town.
- Development should be accommodated around existing transport routes, close to employment areas and/or in small extensions to villages.
- The large extensions proposed will result in a loss of rural identity, character, historic and landscape value. Substantial green belts need to be established around these towns.
- No evidence to suggest that mixed developments of the nature proposed are attractive places for people to live, successful in terms of employment or in the provision of necessary public services. Accordingly, they are not sustainable.
- The levels of future housing provision in Daventry beyond 2026 are underestimated and need to be revisited against the criteria in Planning Policy Statement 3: Housing and associated advice produced by the Department for Communities and Local Government (CLG).
- There is no guarantee that people living in these urban extensions will choose to work in them as well. As such, this aspect of the proposal is not sustainable.
- The proposed urban extensions are developer led, as it is easier to develop greenfield sites rather than brownfield.
- This option provides no contingency, should sites not come forward as planned.
- The JPU prefer Option B as the development of green field sites as proposed is the most cost effective for developers, thus yielding the highest possible section 106 contributions.
- This option is not consistent with the Regional Spatial Strategy (RSS), as no evidence has been provided to indicate that these urban extensions are the most sustainable. This option does not meet Policies 1, 3 and 4 of the RSS.
- A definition of 'large development area' has not been provided.

- This Option bears no resemblance to the options deemed most suitable by the public after the preferred options consultation, namely development around North Northampton and the M1.
- This Option is flawed as it does not take into account the proposals of the East Northamptonshire JPU and the Milton Keynes South Midlands Growth Area.
- Due to the current review of the RSS, it is premature to consider housing provision beyond 2026. Accordingly, the total housing provision should be 40,375 homes not 43,000. The basis for these large urban extensions is therefore flawed.
- Some small scale development can occur that makes efficient use of infrastructure and environmental capacity. As such, it is incorrect to assume that this efficiency should be the basis for selection of Option B.
- Development needs to occur on both urban and greenfield sites in tandem to ensure growth is delivered in a timely manner. As such, the priority given to urban sites in this option is flawed.
- Option B is a massive over-response to an excessive regional requirement. The residual requirement for development in Northampton is 11,442 of which around 9,400 should be on brownfield sites and 2,000 on greenfield sites.

General Comments

- Developer contributions must be paid into a fund controlled by an accountable body to ensure funding is directed is retained for specific purposes.
- More explanation is needed on the type of employment arising from the development. For example, will it be short term associated with the construction of all the homes or new employment areas providing long term employment.

Joint Planning Unit Response

Option B will not encourage the growth of new towns. The Sustainable Urban Extensions (SUE's) are on the edge of existing settlements and as such will be integrated with the existing settlements and will not form new towns. Policy S5 of the PSJCS clarifies that this is the case and states that, *"Outside the existing urban areas development will be focused on sustainable urban extensions to the urban areas"*. Each SUE will also provides an integrated transport with the urban area that they are connected to.

There is no evidence to suggest that the SUE's will prevent Northampton from becoming a city. It has been determined that the SUE locations are the most suitable and sustainable through the Sustainability Appraisal (SA). In addition, each SUE specified in the PSJCS is expected to provide an, *"integrated Transport Network focused on sustainable transport modes, walking and cycling with strong links to the town centre and adjoining neighbourhoods and employment areas"*. This integration will help to expand Northampton and help promote its elevation from town to city status.

It is not specified as to why there is 'reason to believe' that 70% of growth could be accommodated on brownfield land. There is not enough brownfield land within West Northamptonshire to accommodate the amount of housing proposed. However, Policy S1 outlines that, *"Priority will be given to the reuse of suitable previously*

developed land”, therefore brownfield land will be developed as a priority over Greenfield land. A target of 30% has been set through this policy.

The majority of the SUE’s will be located around existing transport routes. It is outlined in the pretext of Policy S5 that, *“Dispersing significant development to the rural areas would not be appropriate as it would increase pressure on the rural environment overall and particularly as a result of the increased need to travel, usually by car, without addressing the needs of the towns themselves”*. This will help prevent the loss of rural identity.

All of the SUE’s detailed in the PSJCS are expected to provide an integrated transport network, *“focused on sustainable transport modes, walking and cycling with strong links to the town centre and adjoining neighbourhoods and employment areas”*. Finally, some of the SUE proposed will contain new employment areas, such as the Northampton North SUE for example.

The historic and landscape value of rural areas will be protected through Policy BN5, which outlines that all new development will, *“Sustain and enhance the features which contribute to the distinctive character of the area including Significant Historical Landscapes and the skyline and settings of towns and villages”*. In regards to Green Belts, there are no designated greenbelts in West Northamptonshire. However, the countryside around rural towns and villages is protected through existing policy. Where an SUE is proposed, substantial areas of green space are proposed as part of the SUE development.

All of the SUE’s will be expected to contribute towards the necessary public services, including the required infrastructure and public transport services. More information has been provided in the PSJCS on the infrastructure that will be invested at each of the SUE’s. For some of the SUE’s it has also been specified as to the level of new educational investment and in some cases the number of school places that will be created. Where new employment facilities are proposed at some of the SUE’s, either the number of jobs that will be created or the size of the employment park have been outlined.

It has also been specified in the majority of the SUE’s the amount of retail floorspace that will be provided at the local centres that are proposed, as well as other facilities that are to be provided. The information provided demonstrates that the mixed use development proposed at each SUE will make them attractive places to live.

The PSJCS does not make any reference to the levels of future housing provision in Daventry beyond 2026.

It cannot be guaranteed that every person living in the SUE’s will work in the local area. Employment facilities are proposed at some of the SUE’s that will encourage people living in the SUE’s to work at the local employment site. For example, the Northampton North SUE (Policy N3) proposes a seven hectare employment development in the form of a technology park. The Daventry North East SUE (Policy D3) will also make provision for “local employment opportunities”. Each SUE is also expected to provide an integrated transport network that will provide strong links to employment areas, which will help encourage residents to work in the local area.

These proposals are not developer led, they have been determined through careful analysis and responses received during previous consultation periods. In addition, it is not necessarily easier to develop greenfield sites compared to brownfield sites, nor is it more cost effective, as brownfield sites are more likely to have the necessary infrastructure and utilities in place, whereas these will have to be built from scratch on greenfield sites. Policy S1 also outlines that priority will be given to the redevelopment of brownfield land; encouraging developers to only develop greenfield if no brownfield sites are available. There is also no evidence to suggest that greenfield development will yield higher section 106 agreements.

Development at other sites will be considered, as the total level of housing proposed at the SUE's would not accommodate the total amount of housing allocation of the PSJCS. The SHLAA has identified a number of sites that would be available to accommodate the development. The sites that have been retained or considered to have potential by the SHLAA could deliver some 148,247 homes, almost three times the requirement of the PSJCS. Therefore there are contingency sites available for development, as well as those sites saved in Local Plans.

It is not specified as to why the SUE's do not meet Policies 1, 3 and 11 of the RSS. The objectives in the RSS apply to the whole plan as well as the SUE's. Evidence has been provided that these options are the most sustainable through the Sustainability Appraisal (SA).

Policy 1 of the RSS discusses the regional core objectives for the area. It is felt that the proposed development options meet the eleven core objectives. Policy 3 focuses on the distribution of new development. The majority of development is located around the Principal Urban Areas (Northampton), with seven of the eleven located around the town.

Policy 3 also outlines a number of criteria that development in other settlements and rural areas will need to contribute towards. It is felt that the three SUE's in Towcester and Brackley meet these criteria. For example, one of the criteria that development needs to meet is to "maintain the distinctive character and vitality of rural communities". Each of these SUE's is expected to contribute towards high quality design and layout which respects the character of the landscape in question. In addition, Policy R1 outlines that a rural settlement hierarchy will be in place which will guide development in rural areas. The rural hierarchy will, *"Protect and enhance the character and quality of the rural area's historic buildings and areas of historic or environmental importance"*.

Policy 11 discusses development in the Southern Sub-area i.e. Northamptonshire. It is felt that the PSJCS meets the spatial priorities set out in this policy. For example, one of the key objectives sets out that, *"the quality of villages should not be degraded by inappropriate growth"*. The rural hierarchy (Policy R1) ensures that this is the case.

A 'large development area' is essentially a Sustainable Urban Extension (SUE). An explanation and justification of the SUE is provided in Policy S5 of the PSJCS.

Out of the four options proposed in the Issues and Options Paper (South Eastern Extension, South Eastern/ Western Extension, North Eastern Extension, Southern/ South of M1), the North Eastern Extension (i.e. North Northampton) and the option South of the M1 were least supported out of the four options, as outlined in the 'Responses to the Short Questionnaire'.

Option B does take into account the proposals of the North Northamptonshire JPU and Milton Keynes. Numerous references are made to Milton Keynes in the PSJCS. Discussions have been held with the North Northamptonshire Joint Planning Unit as well as Milton Keynes Council, as well as these parties being consulted with during previous consultation stages of the Joint Core Strategy. North Northamptonshire's JCS also refers to West Northamptonshire, albeit briefly. Paragraph 2.2 of the North Northamptonshire JCS outlines that "Adjoining districts in West Northamptonshire and Bedfordshire are also planning for major growth as part of the MKSM Growth area"; therefore a brief reference could be made in the West Northamptonshire JCS regarding growth in neighbouring areas.

It is not specified as to why the provision should be 40,375. The 43,000 is for a period between 2001 and 2026. Since the publication of the EJCS, it has since been determined that the figures specified in the RSS are not deliverable in light of the recent recession. As a result, the level of housing proposed for Northampton in the PSJCS has been revised downwards to 26,220.

The SUE's will deliver the majority of the housing growth but will not accommodate all of the proposed housing development; therefore development of some small scale sites will be encouraged. If small scale development were to be pursued instead of SUE's, this would lead to a greater strain on the existing transport network and utilities infrastructure. Such incremental development is more difficult to serve with the range of community facilities needed to support the increase in population. The Rural Settlement Hierarchy (Policy R1) will, *"enable small scale housing and employment where this meets local needs and/ or supports local services"*. Therefore some small scale development will be encouraged in rural areas.

Policy S6 details the phasing of each of the SUE and will ensure that development is delivered in a timely manner. There is no evidence to suggest that the delivery of development on greenfield land in tandem with urban development will ensure that development will be delivered in a timely manner. This would also contradict Policy S1, which outlines that priority will be given to the redevelopment of brownfield over greenfield within West Northamptonshire.

Option B is not a massive over-response: the options have been thoroughly analysed based on a robust evidence base and previous consultation periods. Since the EJCS the housing trajectory has been reduced in light of the current economic situation. In regards to how much development should occur on brownfield and greenfield land, it is again not specified as to why this level of development should occur on brownfield and greenfield land. Policy S1 specifies that a target of 30% of new residential development and conversions will occur on brownfield land.

General Comments

Section 106 contributions will always go towards what is specified in the planning application. It is unreasonable to expect a developer to pay for an infrastructure requirements, for example, to which their development does not affect.

Where employment provision is discussed in an SUE policy, it is usually highlighted the type of employment that is proposed. For example, at the Northampton North SUE, it is detailed that the employment will occur in the form of a Technology Realm. More detail could however be provided for some of the SUE's. For example the Northampton North of Whitehills and Northampton Upton Park SUE's for example it is only specifies that "Local Employment Opportunities" will be provided.

Recommended Action

The overall approach of focusing growth in a small number of larger development areas remains valid, but the scale of development required and the locations should be reduced to reflect the latest evidence used to prepare the PSJCS.

Question 21 - Do you support the combined Choice of Urban Extensions?

Summary of Representations

Total	Support	Object	Gen. Comments
1648	87	1532	29

Summary of issues raised by objectors

- The options to the south and west of the M1 should not be ruled out they can provide sustainable extensions to Northampton.
- If new houses are to be built in Northamptonshire they should be kept in line with the natural population growth of the County.
- There is no relationship between the Emergent JCS and the Northampton Central Area Action Plan (NCAAP).
- Preferred locations do not provide good access to central area of Northampton. Residents will be inclined to travel to Milton Keynes for shopping/ retail needs.
- No as I live in a parish destined to be over run by development.
- As a resident of the town, I do not want to see the rural outskirts of the town destroyed by ill thought out development when we could be designing excellent settlements with a little more short-term effort.
- The east of Daventry could be improved by the replacement and relocation of the 'tin sheds' near the town centre with housing.
- It is unclear how the housing options have been influenced by the Northampton, Towcester and Brackley, and Daventry Landscape Sensitivity Studies.
- The options are contrary to Government policy to protect green belts.
- Development with direct/easy access to M1 is not sustainable. It will encourage people to travel to Milton Keynes and discourage the regeneration of Northampton Town Centre.
- The options are not supported. Land at Arm Farm, south of Milton Malsor, has been inappropriately assessed in the Strategic Employment Land Assessment (SELA) and provides a deliverable option for significant growth in the area.
- Object to growth at Daventry until the Inspectors report from the 2009 Planning Inquiry has been issued.
- The northern, western and south-eastern expansions of Northampton are predicated on major road improvements. This approach is not sustainable and contradicts the shift to non-car transportation modes.
- The growth projection informing level of housing growth is inaccurate and the JPU estimates of the housing requirement and past completions are incorrect. The urban extensions are therefore unjustified.
- The Emergent JCS does not reflect the development options consulted upon as part of Issues and Options stage.
- The proposal for Junction 16, M1 is not supported and would result in coalescence of Northampton and Kislingbury.
- There is no evidence base to suggest Sustainable Urban Extensions (SUEs) would be successful. SUEs were rejected as part of the County Structure Plan.

- Requiring more affordable housing in rural areas will reduce attraction of these areas and restrict urban to rural travel resulting in demise of rural communities.
- The Emergent JCS appears developer and land owner led. Proposed urban extension will be designed to maximise profitability and will not give adequate weight to environmental and social considerations.
- Concerns that the Emergent JCS plan period is beyond that of the RSS, this will have implications in terms of the existing evidence base, in particular the application of the emerging water cycle study.
- Northwest Northampton has not been considered in the plan preparation process and there must be significant opportunities in this area.
- Development is too focused toward the south of Northampton, resulting in unsustainable and uneven development pressure in this area – particularly in terms of infrastructure and the existing road networks.
- These proposals should be locally and democratically decided.
- Enveloping surrounding local villages with SUE's is not supported.
- Concern over inclusion of Daventry North as a potential direction of growth. The limited studies regarding the suitability of the site, particularly early in the plan period, indicate that the inclusion of this site is illogical.
- Communities occupying recent development to west & south of Northampton are lacking the proposed infrastructure / un-adopted roads. Also a substantial amount of development that has been permitted but is not yet constructed. These sites must be completed with adequate infrastructure before new development is considered.
- Flooding occurs west of Northampton and valuable countryside would be destroyed to the south-east. Development to north & east would be preferable.

General Comments

- If expansion is unavoidable, would the land to the north of Northampton, towards Kettering, be a better option? Kettering is fast expanding with new rail links and infrastructure and would possibly benefit from new housing.
- The areas that have been spoilt, such as the M1 corridor to the West of Northampton and the towns to the east, such as Wellingborough, Kettering and Corby could be considered for development.
- Those who commute into Northampton town to work encounter as much traffic leaving the town centre as those entering it, indicating that if housing is placed in the town centre people will commute outward to business or other areas.
- Modal shift in transportation is unrealistic as demonstrated by up-to-date traffic modelling statistics and projections.
- The quantum of housing at each urban extension must be explained.
- Identification of employment land within the extensions should not prejudice the potential that can be offered within existing built up areas.
- The Emergent JCS lacks detail in explaining how the housing targets of the Northampton Implementation Area (NIA) will be met. The housing trajectory that was purported to inform the JCS would be useful in determining the achievability of the JCS in meeting these objectives.
- The extent of the Northampton Implementation Area (NIA) must be defined in adopted version of the JCS.

- The Housing Technical Paper is not available to support housing figures. There is no explanation as to how the residual housing figures have been arrived at.
- Dallington Grange allocation not been given sufficient recognition in the Emergent JCS.
- The opportunities in North Northampton to create a 'knowledge corridor' and the 'University Arc' associated with the Northampton University, Moulton College and Northampton College have been missed. Limited growth here will limit the potential to provide the infrastructure to open up this area to development.
- Junction 16, M1 is integral to the delivery of the employment targets within the strategy. To caveat its allocation with a requirement for further study prejudices the allocation of this site.

Joint Planning Unit Response

The option to the south and west of the M1 was the second most unpopular SUE out of those proposed at the Issues and Options stage. One reason growth to the south and west of the M1 was ruled out was that the option "is not based on sustainable development principles compared to the other options around Northampton". This development would also prevent good linkages between existing and new communities and would also not encourage modal shift to non-car transport due to the role of the M1 being a definite physical barrier.

The Sustainability Appraisal (SA) also specifies that development to the south and west of Northampton is one of the least sustainable options. For example, in regards to health and well being, it is the only extension that "*is not within the maximum proximity (GP 5km, hospital 10km), to which key local health services should be located.*" (Appendix D, pg 22).

The population growth highlighted in the PSJCS is based on net-nil migration i.e. the natural population growth. However, other factors have been taken into account when determining the level of housing within the area. More and more people are living on their own, as well as an ageing population.

Throughout the PSJCS references are made to the role of the Northampton Central Area Action Plan (NCAAP) and its relationship with the JCS. For example, it is outlined on page 100 of the PSJCS that "*The Central Area Action Plan will define the Town Centre Boundary and the Primary Shopping Area for Northampton and will set out a clear vision for the future of the Central Area, in line with the vision for West Northamptonshire set out within the JCS*".

The proposed SUE's include proposals for public transport and road improvements and will provide good access to the centre of Northampton. It is detailed in the PSJCS that for each SUE it will be expected that the development will provide "*An Integrated Transport Network focused on sustainable transport modes, walking and cycling with strong links to the town centre and adjoining neighbourhoods and employment areas*".

The required housing growth cannot be accommodated within existing urban areas and will need to take place within some parishes. None of the three authority areas

have designated green belts. Instead each authority has their own policy on the protection of environmental and countryside areas. However, all new development will need to abide to Policy BN5, which outlines that all new development will *"Protect and enhance the features which contribute to the distinctive character of the area"*. The SUE's will also include Green Infrastructure and wildlife corridors, as well as large areas of greenspace, which will help reduce the impact upon the parish.

The SUE's are not ill thought out development proposals. They have been assessed based on a robust evidence base that has been refined through consultation stages. To build new towns is less sustainable; new infrastructure would have to be constructed instead of extending existing infrastructure at the SUE's. The building of new settlements would also increase the load to the current road infrastructure.

It is unclear what the respondent is referring to in regards to the *"tin sheds"*, nor their precise location. A new SUE at Daventry North East is proposed which will provide 4,000 dwellings. This SUE will also be expected to create Local Employment opportunities for 1,000 jobs, as well as an integrated transport network. The development will be expected to be of a high quality standard.

Figures 20 and 21 of the Daventry Infrastructure Plan (Jan 2009) show how the housing options have been assessed against relative landscape areas. Maps 12 and 13 assess the housing growth areas against the Landscape Sensitivity and Green Infrastructure of Towcester and Brackley. The Northampton Landscape Sensitivity and Green Infrastructure study was published in February 2009, before the JCS was published for consultation in July 2009. The Northampton study therefore does not take into account the housing growth options, but does cover the areas in which the housing growth is to take place.

Appendix D of the Sustainability Appraisal (SA) has considered the Northampton sensitivity study. Appendix D outlines that *"comments are made with reference to the Northampton Landscape Sensitivity and Green Infrastructure Study"*.

It cannot be guaranteed that people living in the SUE's would not travel down to Milton Keynes. Some of the SUE's contain employment proposals which will encourage people to work in Northampton rather than commuting elsewhere. Policy N2 also discuss the regeneration of Northampton town centre which will further encourage people to work in the town. Policy N2 states that *"Major retail, office, leisure and cultural development will take place in the Northampton Central Area"*.

It is not specified as to why Land at Arm Farm has been *'inappropriately assessed'* in the SELA. The SELA was prepared by Northamptonshire Enterprise Ltd in conjunction with the local authorities in Northamptonshire. The SELA went through an extensive consultation process; any comments regarding this site should have been made during the SELA consultation and not during consultation on the PSJCS.

The Daventry Inspectors report has now been published. Some of the appeal sites were approved (Monksmoor), whereas others (Church Fields (accepted in principle but would require the delivery of the Flore/ Weedon Bypass) and Danetree) were dismissed. Although the Monksmoor approval gives a degree of relief to the housing supply shortfall, it is very much a stop gap (less than 2 years supply). Daventry still

falls short of providing a deliverable five year supply. The Daventry North East SUE is required to help accommodate the required population growth in the town.

The Northampton SUE's need good access arrangements to be viable. Each SUE is expected to provide *"An integrated transport network focused on sustainable transport modes, walking and cycling, with strong links to the relevant town centre"*. If the SUE's were located away from major transport routes it would be more difficult to access to public transport; therefore people would be more inclined to travel by car.

The growth projection informing levels of housing growth are not incorrect. The growth projection are based on net nil migration growth and have been revised downwards to take into account the recent recession and resulting reduction in house building. The level of past completions is monitored on a regular basis, as this is a key indicator in the production of AMR's. Therefore the estimates of past completions are not incorrect and the urban extensions are not unjustified.

The Emergent JCS does reflect the development options consulted upon during the Issues and Options stage. The rejected options in the Emergent JCS are those which proved to be the least popular, as outlined in the analysis of responses to the short and long questionnaire, as well as being the least sustainable.

Although an SUE (Northampton West) is proposed in the vicinity of Kislingbury, it does not extend to the actual village. The SUE proposed at Northampton West is located a significant distance from existing settlements such as Kislingbury and Harpole and will not lead to coalescence.

The County Structure Plan has now been superseded RSS. SUE's were not rejected as part of the County Structure Plan; they were not the highest priority search strategy contained in Policy GS4 of the Northamptonshire Structure Plan (Development Strategy). Policy GS4 outlines that *"When identifying sites for new development local planning authorities will follow a search sequence, starting with the re-use of previously-developed land and buildings and other land within urban areas identified by urban capacity studies, then identified urban extensions termed strategic development areas (see Policy SDA1)"*.

Policy GS4 has not been saved; Policy SDA1 is the only policy to be saved from the structure plan. Policy SDA1 outlines that; *"Provision will be made for mixed-use urban extensions, termed strategic development areas"*, including Daventry and Towcester. These "Strategic Development Areas" were essentially a pretext for SUE's and formed part of the evidence base to suggest SUE's would be successful. The PSJCS has specified that SUE's will be the most successful options as, *"Dispersing significant development to the rural areas would also not be appropriate as it would increase pressure on the rural environment overall and particularly as a result of the increased need to travel"*. Regarding the evidence base, a study was commissioned before the Issues and Options to undertake a study to identify the longer-term growth options for Northampton. The purpose of this study was to undertake a strategic analysis of potential sustainable growth options to inform the preparation of the JCS.

Policy H2 details that affordable housing on rural exception sites will have to meet strict criteria before permission will be granted. The development will need to demonstrate that it, *“is sympathetic to the form, character and setting of the settlement and accords with normal policy requirements relating to design, access, parking, landscape and highway safety”*. It is detailed in the pretext of SUE policy that, *“Dispersing significant development to the rural areas would also not be appropriate as it would increase pressure on the rural environment overall and particularly as a result of the increased need to travel, usually by car, without addressing the needs for the towns themselves”*.

The Emergent JCS has not been developer and land owner led. The SUE's are an essential requirement, as the housing provision cannot be accommodated within existing urban areas. The proposals also give adequate weight to environmental and social considerations. Priority will be given to the redevelopment of brownfield over greenfield land under Policy S1. Policy BN5 also ensures that all new development will, *“Protect and enhance the features which contribute to the distinctive character of the area”*. Each SUE will also be expected to provide some form of green infrastructure and wildlife corridor, as well as integrating with existing communities.

The RSS period runs up to 2026, the same time frame as the Joint Core Strategy. The evidence base is also updated on a regular basis to ensure the Joint Core Strategy is based on robust and up to date documentation.

Three SUE's are located to the North West of Northampton. These are Northampton North of Whitehills, Northampton West and Northampton Kings Heath.

Development is not focused to the south of Northampton. Only two of the seven SUE's are located to the south of the town and will only deliver a combined total of 2,000 dwellings. The SUE's are also of a relatively small scale. Northampton North for example will deliver 2,500 dwellings for example. The two SUE's will also deliver a number of infrastructure improvements, including a contribution towards two new primary schools of 420 places each, an integrated transport network and a financial contribution towards the North Western bypass.

These proposals will be determined by either by the local planning authority or WND. Large scale proposals will be determined by committee, where it will be democratically decided between councillors whether to approve or refuse the scheme.

Enveloping surrounding villages is not supported in the PSJCS, as the document outlines that, *“Dispersing significant development to the rural areas would not be appropriate as it would increase pressure on the rural environment overall and particularly as a result of the increased need to travel, usually by car, without addressing the needs of the towns themselves”*.

The Daventry North option has not been carried forward into the PSJCS as a reduction in housing figures has meant that this proposal is no longer deliverable.

Three of the four proposed SUE's are located to the west and south of Northampton. Each of these SUE's specifies the level of infrastructure that will be delivered,

including new education provision as well as, *“an integrated transport network focused on sustainable transport modes, walking and cycling with strong links to the town centre and adjoin neighbourhoods and employment areas”*. The Infrastructure Development Plan (IDP) will outline when this infrastructure will be built. It is likely that with the phasing of development the infrastructure will be expected to be delivered before the development can be occupied.

Flooding also occurs to the north of Northampton along the Brampton Arm. Any SUE that is in a flood risk area will be expected to provide a flood mitigation measures. Although flooding does occur west of Northampton, the Northampton West SUE does not fall within a flood risk area. In regards to the loss of valuable countryside, not all of the development can be built on brownfield land and some countryside/greenfield areas will have to be developed. Policy S1 sets a target of 30% of all new residential development and conversion to be built on previously developed land.

General Comments

It is the responsibility of the North Northamptonshire to determine the growth around Kettering as it is in their area. However, of the seven SUE's proposed around Northampton, three are proposed to the North of the town. These developments are also of a larger scale.

The North Northamptonshire Joint Planning Unit will determine the level of growth at Wellingborough, Kettering and Corby through their JCS. It has also not been specified which area of the M1 corridor that is referred to. The growth option south of M1 and south west has been rejected on the grounds that it is one of the least sustainable options. The option would be *“unlikely to foster the regeneration of Northampton to enable it to fulfil a greater role within West Northamptonshire and the Region.”*

There is no evidence to support the claim that those commuting into Northampton Town Centre to work encounter as much traffic as those leaving the town centre. It cannot therefore be demonstrated that if housing is placed in the town centre people will commute outwards. The NCAAP produced by Northampton Borough Council determines where housing as well as other land uses, such as employment land for example, will be allocated. Out-commuting may occur from the town centre as the type of employment that a town centre resident works at may not be suited to town centre uses. There are also no SUE's proposed in the town centre, therefore this comment has little to do with the question.

It has not been detailed what the up-to-date traffic modelling statistics and projections are. Each SUE is expected to provide an *“Integrated Transport Network with Sustainable Transport Modes”*. In addition the JCS makes reference to the transport strategy for each of the four main towns in West Northamptonshire.

No reference is made within the PSJCS as to how the quantum of housing at each SUE has been determined. Whilst it is the housing evidence base that justifies the quantum of housing at each SUE, it has not been highlighted in the JCS that this is the case. To provide an explanation in the pretext of each urban extension on how the quantum of housing for that particular SUE would become repetitive, nor is it the

responsibility of the JCS to explain this. Instead, a paragraph in the pretext of the description of the SUE's in general could be provided that sets out how the quantum of housing was determined, which evidence base documents were used and where further information can be found.

The employment land identified within the SUE's would not prejudice that which can be offered within existing built up areas. Policy E1 details that *"Existing and allocated employment sites and industrial estates across West Northamptonshire will be retained for uses within use classes B1, B2 and non strategic B8"*. In addition, all new office development will be subject to a sequential test in the criteria specified in Policy E2, rather than being preferably developed on employment land within the extensions. Finally, Policy S2 encourages the use of previously developed land over greenfield sites. There is more brownfield land within existing built up areas, therefore it is likely more development within existing built up areas will occur.

The housing trajectory that was purported to inform the JCS (i.e. the figures detailed in the RSS) is no longer deliverable in light of the recent recession. In response to this the West Northamptonshire JPU has revised the housing targets downwards, as described in paragraph 5.16 of the PSJCS. It has also been outlined in paragraph 5.17 what steps were taken in order to establish an achievable and reasonable level of housing provision.

Policy S6 details the phasing of development that will take place over the plan period to demonstrate how the housing targets are achievable over the plan period. This phasing takes into account the recent recession, as the housing targets are significantly reduced for the period 2011 – 2016 compared to later periods of housing growth.

A Northampton Related Development Area will be shown on the proposals map.

An explanation has been given in the PSJCS of why the housing provision has been reduced. The relevant housing technical papers are also already in place, with the most recent SHMA being published in June 2010 and the most recent SHLAA published in November 2009, with an updated SHLAA to be published in February 2011. The consultees response is however understandable as this evidence base was not in place when the EJCS was published for consultation in August 2009.

The SUE at Dallington Grange is a strategic allocation identified in Saved Local Plan policies that does not have planning consent. The JCS does not replace the Saved Adopted Local Plan policies that allocated the site. This means that planning applications in relation to the site should be determined in accordance with those policies as well as the policies contained within the JCS.

As part of the Northampton North SUE, a 7ha "Technology Realm" is proposed. This is located close to the University of Northampton as well as other key Higher and Further education partners. It is outlined in pretext of Policy N8 that "The concept of the Technology Realm in this location is to provide, through collaboration with learning and skills partners, a highly skilled and knowledge based workforce that is capable of meeting the needs of targeted employers".

In addition, Policy E6 supports the University of Northampton and states that, *“The role of the University of Northampton, Moulton College, Northampton College and other educational institutions will be supported. Where new facilities are necessary these should be developed at sites which are accessible by sustainable transport modes or where sustainable transport modes can be effectively provided”*. Therefore the opportunities to promote Northampton University have not been overlooked.

As the housing target has been revised downward the level of employment development is no longer required. This employment proposal has not been carried forward into the PSJCS. A number of highways objection were received during the consultation period of the EJCS to the inclusion of this employment allocation. Therefore the allocation at Junction 16, M1 was not the most sustainable option.

Recommended Action

The combined choice of urban extensions has been thoroughly reviewed in the light of the response received to the EJCS and the new evidence that has informed the PSJCS. This is reflected in the revised SUE proposals in the PSJCS.

Question 22 - Do you support the policy approach for Affordable Housing and particularly the provisions suggested in Table 6.1 'Levels of Affordable Housing – from Affordable Housing SPD sites of 15 or more dwellings'?

Summary of Representations

Total	Support	Object	Gen. Comments
1458	80	1335	43

Summary of issues raised by objectors

- The threshold and/or levels of affordable housing sought are too low and will not meet market demand.
- The threshold and/or levels of affordable housing sought are too high and will make many developments unviable.
- The affordable housing requirements should be reassessed in light of changes in the financial and housing environments.
- An additional policy is needed to prevent developers artificially submitting multiple planning applications for schemes of fewer than 14 units.
- Viability testing should apply to development under 50 units and at trigger points in larger schemes to allow for changing market conditions.
- Viability testing delays developers' responses to provision.
- Affordable housing levels should be set by Local Councils as they can identify which villages can support additional housing and address local need, with the support of the existing residents and the local Parish Councils.
- Blanket approach to affordable housing should not be used given variations in local circumstance and the differences in viability between rural and urban sites.
- No evidence has been provided for how the figures were determined or their viability. Many schemes will become less viable in the future due to higher S106 contributions, the recession and the Community Infrastructure Levy (CIL).
- Table 6.1 is unclear as no explanation is given for the asterisk in the 'Level of Affordable Housing' column. The sums equal more than 100%. What percentage will apply to 'SUE's', which are intended to function as extensions to urban areas but are currently rural?
- Mixing affordable and private market housing creates problems.
- More detail needs to be provided in the Emergent JCS, rather than a subsequent SPD as the latter cannot be legally tested.
- Figures are premature in light of the forthcoming Developer Contributions DPD.
- Affordable housing will reduce house market house prices in areas it is located.
- Levels of affordable housing proposed are higher than targets set by Government.
- Focus should be on 'intermediate' housing as 'social rented' housing is not valued by its occupants.

General Comments

- Is the 'Development Control Authority' referring to WNDC or Local Councils?
- What does 'open book basis' mean?.

- Clarification is required whether policy approach refers to the number of dwellings or the percentage of affordable housing that will be required.

Joint Planning Unit Response

The level of affordable housing has been carefully assessed by the JPU in light of the recent economic circumstances. The Strategic Housing Market Assessment (SHMA) has carefully considered the affordable housing requirement and has been updated since the Emergent JCS for the Pre-Submission JCS.

The PSJCS affordable housing figures have, as a whole, been reassessed in the light of the level of housing now proposed and take viability into account. The EJCS sets out a target of 35% and 40% for Daventry Town and Daventry Rural respectively, whilst the target for South Northamptonshire Urban and South Northamptonshire Rural were 40% and 50%. The target is now 31% for Daventry District and 38% for South Northamptonshire.

The levels of affordable housing have been reassessed in light of the financial and housing environment. The reduced overall target for housing development also means a reduced requirement for affordable housing.

In South Northamptonshire where the need is greater, an affordable housing contribution will be expected from all sites. In Northampton less than 5% of development occurs on sites of less than 15 units, therefore only a small number of sites will be exempt from providing affordable housing. In those exceptional circumstances where on site provision cannot be provided, Policy H2 outlines that, *"Off Site Provision and/or commuted payments in lieu of on-site provision may be supported where this would offer an equivalent or enhanced provision of affordable housing"*.

Viability testing shall apply to all sites, as specified in Policy H2 of the PSJCS. H2 states that, *"In all cases the percentage requirements identified above are subject to the assessment of viability on a site by site basis"*. In addition, a percentage of affordable housing is required on all sites in Daventry and South Northamptonshire. In cases where affordable housing cannot be accommodated on sites, *"off site provision and/or commuted payments in lieu of on site provision may be supported where this would offer an equivalent or enhanced provision of affordable housing"*. Therefore viability testing does apply to all sites within West Northamptonshire.

There is no evidence to suggest that viability testing delays developers' responses. Viability testing is in place to assess the capacity of each site for affordable housing. Policy H2 outlines that, *"in exceptional circumstances, off site provision and/or commuted payments in lieu of on-site provision may be supported where this would offer an equivalent or enhanced provision of affordable housing"*. Therefore viability testing will not delay developers' response to provision.

Affordable housing targets have been set in conjunction with local council's through meetings and consultation periods. In regards to determining which villages can support additional housing and address local need, the Rural Exceptions site section of Policy H2 outlines that affordable housing development will have to meet a number of strict criteria before planning permission will be granted on site.

A blanket approach has not been used. Policy H2 outlines that the affordable housing target varies region by region depending on the level of need. In addition, affordable housing is required on all sites in South Northamptonshire and Daventry and not just on developments of fifteen units or more. Policy H2 also states that in all cases the percentage requirements identified for each district will be subject to the assessment of viability on a site by site basis. Finally, a rural exceptions policy has been included, where affordable housing will be approved on small exception sites in rural areas provided the criteria specified in the policy can be met.

It has been specified in the pretext of policy H2 that the policy will, *“set out the percentage requirements and site size thresholds for affordable housing based on the findings of the SHMA and the Viability appraisal”*. There is no evidence to suggest that S106 levels will increase and it is too early to assess the impact of the CIL on affordable housing viability. The Developer Contributions requirement for affordable housing will be set out in the Developer Contributions SPD. Viability assessments will also assess whether affordable housing can be provided on or off site or whether a commuted sum will be sought.

No reason was given to the asterisk; this has now been removed. It is unclear what ‘sum’ the respondent is referring to. It is the level of affordable housing that is proposed in the district. Adding these values together does not exhibit that affordable housing provision is greater than 100%. The socially rented and intermediate housing are a percentage of the level of affordable housing. The socially rented and intermediate always add up to 100% and do not exceed the figure.

There is no evidence provided as to why mixing affordable and private market housing will create problems. Objective 4 of the PSJCS sets out that the JPU wishes to, *“Ensure new development in urban areas effectively supports and links new and existing communities physically and socially, to achieve social cohesion and address the areas of deprivation”*. Creating separate affordable housing and market housing areas will not lead to integrated communities and increase social tensions. In addition, all new development will be expected to abide to the Sustainable Development Principles set out in Policy S10 as well as abide to the ‘Lifetime Homes’ standards discussed in Policy H5.

Greater detail on affordable housing has been provided in the PSJCS when compared to the EJCS. The Affordable Housing SPD will provide further guidance on the operation of the Affordable Housing policy. This SPD will be subject to a period of consultation. In addition, PPS 12 sets out that, *“SPD’s should not be prepared with the aim of avoiding the need for the examination of policy which should be examined”*. The policy on affordable housing will be examined as part of the JCS preparation process; the SPD simply provides more guidance on this.

It has not been made clear as to why the affordable housing figures are premature in light of the pending Developer Contributions DPD. The Developer Contributions DPD will set out the level of contributions that are sought for a form of development and will have no impact upon the affordable housing provision. In addition, the Developer Contributions DPD will be adopted after the adoption of the Core Strategy. The figures in the JCS cannot therefore be affected by the Developer Contributions DPD.

It has not been specified as to how affordable housing will reduce house market prices. If no affordable homes are built then this would drive house prices higher, making it increasingly difficult for first-time buyers to get onto the property ladder.

Central Government does not set out affordable housing targets. The RSS sets out the level of affordable housing that is sought. The RSS specifies a target of 17,900 for the area, whereas the PSJCS only seeks a total of 11,800 units; therefore the levels of affordable housing are lower than those proposed by central government.

No evidence has been provided to suggest that 'social rented' housing is less valued by its occupants compared to 'intermediate' housing.

General Comments

Which body is the 'Development Control Authority' depends on the location of the proposal. If the proposal is located within the West Northamptonshire Development Corporation boundary and is above 50 dwellings, then the West Northamptonshire Development Corporation will assess the application. If the proposal is outside the boundary, then the relevant local authority will determine the application.

The reference to 'open book' analysis has been removed from the affordable housing section of the PSJCS. However, 'open book' analysis is referred to elsewhere in the PSJCS. An explanation of what open book analysis is will be included in the Glossary.

Policy H2 of the PSJCS sets a percentage target for affordable housing to be delivered on qualifying sites.

Recommended Action

That the policy approach for Affordable Housing as set out in Policy H2 of the PSJCS be confirmed.

Question 23 – Do you support the policy approach for Gypsies and Travellers accommodation? In particular do you support the criteria defined?

Summary of Representations

Total	Support	Object	Gen. Comments
226	59	87	80

Summary of issues raised by objectors

- Plan should commit to the provision of the pitch numbers identified in the Gypsy and Traveller Accommodation Assessment (GTAA) up to 2017 and estimate the likely additional numbers that would be required up to 2026.
- Criteria specified should apply to applications for sites to meet unexpected demand and not just to site allocations.
- Criterion relating to 'accessibility to services' is unduly restrictive and should be amended to read 'the site is reasonably accessible to local services'.
- Questioned why permanent sites are needed if the gypsy lifestyle is nomadic. If a settled existence is required then they could occupy housing. Greater emphasis should be given to transit sites rather than permanent ones
- Concern that sites provided will not be adequately maintained and that the local authorities will fail to deal with associated problems.
- Priority should be given to local communities and sites should be subject to their agreement.
- Sites should be removed from existing or planned housing. Locating sites within housing estates will not work.
- Neither community has any desire to integrate because lifestyles are fundamentally different. This should be recognised in the policy.
- Insufficient information is provided as to where sites would be located, why the accommodation is needed or the impact it would have on local communities.
- What is proposed will not solve problem. Government owns vast areas of land which could be considered for proper sites for genuine traveller communities.
- No reference made for the need for sites to be notified and reviewed under normal planning controls. Why should gypsies and travellers be given planning opportunities that are denied to others?
- The document should be clear on how the locations will be identified and published for public comment.

General Comments

- If sites are not transient but catering for fixed communities is their status residential as all services should be in place?
- The Campaign to Protect Rural England (CPRE) is currently reviewing this matter and will comment.
- Great Oxenden is meeting Daventry District's 2007-2012 requirements with sites at Justin Park and Braybrooke Road. Taking into account provision elsewhere no more sites are needed.

Joint Planning Unit Response

The Draft PSJCS does commit to the provision of numbers contained within the GTAA. In terms of estimating the likely numbers by 2026, it has been outlined in the PSJCS that this will be determined through future revisions of the GTAA.

The document also outlines that the site selection criteria will be applied for, *“the consideration of planning applications for sites to meet unexpected demand”*.

The PSJCS has been amended to be less restrictive in terms of accessibility. It now reads, *“The site is reasonably accessible to a range of services set out in national policy”*

Ten transit pitches are required up to 2017. If greater emphasis were to be put on the provision of transit sites, these sites would not be of as good a quality as permanent sites. Circular 01/2006 details that research has been undertaken which demonstrates that there is a link between lack of good quality sites and poor health and education. Gypsies and Travelling People are by their very nature nomadic so would unlikely to be interested in occupying housing units.

Policy H6 of the PSJCS states, *“the site will be capable of providing adequate on site services for water supply, power, drainage, sewage disposal and waste disposal facilities”*. Therefore it will be expected that the sites will provide adequate infrastructure facilities.

It is the responsibility of the relevant local planning authority, not the public, to determine the planning application. The local community and relevant stakeholders will of course be informed of an application and be invited to comment on the application during the statutory consultation period of the planning application.

Policy H6 of the draft PSJCS outlines that, *“the scale and location of the site will not have an unacceptable impact on existing communities”*. In addition it is expected that, *“The site will provide an acceptable standard of amenity for the proposed residents”*. Circular 01/2006 also outlines that, *“Local authorities should seek to promote a peaceful/ integrated co existence between the site and local community”*. Therefore whilst the site and existing housing will be located away from each other to protect the amenity of local residents and occupiers of the site, it will still be expected that the two communities will be integrated through reasonable access to services for example.

On the other hand, Circular 01/2006 specifies that sites should have reasonable access to local services such as education and healthcare. There is a link between a lack of good quality sites and poor health and education facilities. Therefore existing communities and gypsy and travelling Showpeople sites need to be reasonably integrated to ensure that Gypsies and Travelling Showpeople have decent access to these services, but also that the amenity of both existing communities and proposed occupiers of the sites needs to be protected.

The Site Allocations DPD will determine where the sites are to be located as well as why they are more suited to this location. The draft PSJCS also explains why these sites are required as it states that, *“The LDF is required by national planning policy (ODPM Circular 01/2006 and CLG Circular 04/2007) to provide sufficient sites to*

meet identified accommodation needs for gypsies, travellers and travelling Showpeople". The circular also states that, *"Authorities should also consider making full use of the registers of unused and under-used land owned by public bodies as an aid to identifying suitable locations. Vacant land or under-used local authority land may be appropriate".* Therefore public-owned land will be considered when determining which sites to develop.

No preferential treatment is given to any community groups when determining a planning application. The draft PSJCS also details a number of criteria that any site allocation or planning application for a gypsy and travelling showpeople site will have to meet in order to be considered.

Recommended Action

The policy approach set out in Policy H6 of the PSJCS has had full regard to the issues raised in representations. A number of changes have been made in response to these representations and no further changes are required.

Question 24

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

Summary of Representations

Total	Support	Object	Gen. Comments
1976	104	1811	61

Summary of issues raised by objectors

- The geographic location of Northampton makes it ideal for industrial/warehouse related employment activities rather than IT/high skilled jobs.
- The JCS area will be unable to compete with neighbouring areas like Oxford in attracting high skilled employment sectors because of the poor skill levels of the local labour force, therefore, the role of other B uses for the area could be strengthened.
- There is an inadequate level of infrastructure that will adversely impact on the level of employment growth in the JCS area.
- The existing evidence base on job growth requirements and sector type is unreliable.
- The Sustainable Northamptonshire Economic Action Plan (SNEAP) employment projection figures should be included as targets within the policy to monitor progress. The provision for employment land should be higher than the Strategic Employment Land Assessment (SELA) projections because the sites may not realistically come forward which may result in undersupply of employment land.
- The jobs to floor space ratio has been underestimated and needs to be clarified.
- The policy approach needs to be more specific in regards to the different places and their economic roles (i.e. types/scale of employment) that they may need to play in the JCS area. For example Daventry and Northampton could promote B8 uses, Towcester and Brackley could promote small B8 elements with a mix of B1/B2 uses.
- A number of developers have put forward a number of sites that could accommodate employment growth (i.e. Towcester Vale, Swan Valley, Northampton).
- The level of employment growth is not required because housing growth has been overestimated and due to the impact of the recession.
- The ratio of jobs to housing is too low.

Joint Planning Unit Response

The Infrastructure Delivery Plan (IDP) and transport strategy will ensure that the necessary infrastructure that is required is delivered to support any proposed growth.

The EJCS advises that at the time of publication the evidence base for employment demand and supply was still being developed. This element of the evidence base has now been delivered in the form of a report entitled West Northamptonshire Employment Land Study, July 2010 (WNELS).

During the course of plan preparation it has become evident that the scale of development as required by the RSS cannot be delivered within the plan period to 2026 due largely to the economic down turn. Consequently, the scale of development as required by the RSS has been reduced for the JCS in line with a deliverable projection and reflecting local needs.

The reduction in the housing delivery reflecting local needs has a consequent implication for employment growth and job requirements. The population modelling has determined that fewer jobs will be required to support an appropriate balance of homes and jobs. The employment modelling based on lower housing growth levels will be explained within a technical paper.

The WNELS, other employment land assessments such as SELA and SNEAP together with new job requirements will inform the policy development in the next stage of the JCS.

The PSJCS document/supporting evidence base papers demonstrates how the level of employment growth was calculated and how it is justified. It is also more specific in regards to the scale, type and location of the proposed employment development.

The IDP will ensure that the necessary infrastructure is delivered to support any employment growth.

Recommended Action

That the policy approach to employment demand and supply as set out in the Economic Advantage section of the PSJCS be confirmed.

Question 25

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

Summary of Representations

Total	Support	Object	Gen. Comments
2482	116	2322	44

Summary of issues raised by objectors

- Opposed to the potential allocation of employment sites for B8 uses (Distribution and Storage) as it may result in high levels of congestion, low employment densities, inefficient use of resources and the potential displacement of high technology/skilled employment.
- B8 uses should be situated away from urban centres and residential areas.
- Infrastructure must be improved to support any employment growth.
- Further clarification is required in regards to the high level of demand employment space for B8, which may only exist in Daventry and Northampton. Hence, the policy approach needs to explain the role of Towcester, Brackley and wider rural hinterland, and the types of employment uses that may be encouraged (i.e. B1, B2).
- Concern that the policy approach of trying to attract high technology and knowledge industries into the JCS areas will not be successful because Northampton doesn't have the education sector and (to some extent) the infrastructure to support them. A more local and specific approach should be pursued to develop the local economy through measures like marketing the JCS area, promoting cultural, creative and tourism industries.
- DRIFT should it be strengthened due to its sub regional and cross regional importance (i.e. West Midlands).
- It is premature for the JCS document to place a high level of focus on DIRFT because the Route Utilisation and Fright Strategy are still being developed.
- The policy approach will need to acknowledge the impact of the recession in terms of how it may have resulted in a high level of vacant employment premises and how this may reduce the amount of employment space that may be need to be allocated.
- The allocation of employment land at M1 junction 16 will impact adversely on the regeneration and development of Daventry town.
- Employment land at M1 junction 16 will be suitable for employment development due to the potential of a new railway station, potential to encourage businesses to relocate from London and its location within close proximity to South and West of Northampton.
- Disagree with the location of the Technology Realm at Northampton North SUE as the location of business clusters is no longer dependent on physical proximity of the hub due to advances in communication technology.
- Northampton North should accommodate a higher level of jobs because it is more sustainable than Northampton South and South East

- Daventry South East SUE should be allocated 10 hectares of employment space at the expense of Daventry North East which should be deleted. A number of studies (i.e. SELA, Commercial Property and Employment Land Study) have supported this view.
- The policy approach should be enhanced by specifying a breakdown of the current employment sectors by district and how they are expected to change in the future. While, others have suggested that the policy approach could make a greater reference to strategic employment sites like Wedon Depot, Silverstone Circuit, etc.

Joint Planning Unit Response

A sustainability appraisal will be undertaken to ensure that any employment allocations are situated in suitable locations and measures are incorporated into the JCS policies to minimise/eliminate any potential adverse impacts (i.e. transport). Also the IDP and JCS Transport strategy will ensure that employment uses are located in locations where the infrastructure is able to support any employment growth, or ensure that the necessary infrastructure is delivered to support the sustainable delivery of the strategic site.

Evidence base like the West Northamptonshire Employment Land Study (WNELS), Sustainability Assessment (SA), other employment evidence base such as SELA and SNEAP and transport studies, etc will help determine the location, scale and type of employment for the allocation of strategic sites.

DIRFT has a valid planning consent for expansion as a phase 2 comprising a further 180,00sqm of additional rail linked distribution and manufacturing buildings. The site has a strategic significance. The RSS requires further rail service sites to be provided within West Northamptonshire and there is a continuing demand for storage and distribution premises within the area. Network Rail is fully supporting of rail connected freight at this location. The Route Utilisation Strategy (RUS) consultation document published in December 2010 indicates that there is sufficient capacity within the network for additional rail freight. The final RUS will be published in Summer 2011.

Silverstone Circuit is a site of international importance for the motor sport industry. Its further development to support the motorsport industry is strongly supported by both South Northamptonshire Council and Aylesbury Vale District Council. The Silverstone Circuit site straddles the boundary between these local authority areas and contributes positively to their economies.

High technology and knowledge based industries are strongly promoted the West Northamptonshire area and an allocation for this type of use will help to broaden the employment diversity and opportunity within the plan area. A site at Northampton North is available achievable and deliverable.

During the course of plan preparation it has become evident that the scale of development as required by the RSS cannot be delivered within the plan period to 2026 due largely to the economic down turn. Consequently, the scale of development as required by the RSS has been reduced for the JCS in line with a deliverable projection and reflecting local needs.

The reduction in the housing delivery reflecting local needs has a consequent implication for employment growth and job requirements. The population modelling has determined that fewer jobs will be required to support an appropriate balance of homes and jobs. Consequently, strategic allocations of the scale suggested at Junction 16 are unlikely to be required to support the plan objectives or maintain an appropriate balance between homes and jobs.

The WNELS (July 2010) has been published and is an available evidence base. It advises on the extent of employment land available, the role of different employment sectors across West Northamptonshire and describes the impact the recession may have on different employment sectors. The WNELS is part of the extensive evidence base that will form policy development for the next stage of the JCS.

Recommended Action

As important employment generation sites for specific uses DIRFT and Silverstone Circuit should continue to be supported through the JCS. A strategic allocation for high technology, business enterprise is supported in a number of employment evidence base documents and links strongly with improving and supporting our education offer. A strategic allocation for Technology Realm should continue to be progressed within the PSJCS.

Given the overall reduction in job requirement to support housing growth in the West Northamptonshire the large strategic employment allocation at J16 has been reassessed as part of a sustainable strategy for an appropriate balance of homes and jobs and is not continued as an allocation in the PSJCS.

A technical paper will be produced to support the provision of the PSJCS and to identify the jobs requirement calculation based on reduced housing delivery.

Question 26

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

Summary of Representations

Total	Support	Object	Gen. Comments
1664	130	1496	38

Summary of issues raised by objectors

- The policy approach should place a higher level of emphasis on maximising the use/ improvements of the existing road network and concentrate on encouraging a modal shift to more sustainable modes of transport, prior considering the need to build new roads.
- The existing road infrastructure will not have the capacity for the additional traffic, created by the proposed growth.
- There is a lack of funding for the sustainable transport measures that have been noted in the policy (i.e. new/improvements to walkways/cycle lanes).
- Developers will not be able to support the funding of infrastructure improvements. More evidence is required in regards to this.
- The policy needs to acknowledge that some users will still need to rely on car use, particularly in rural areas where the provision of realistic alternatives is not possible. Otherwise, there may be a risk that policy may undermine the development of rural areas. Transport links between the rural areas need to be improved.
- In urban areas, the policy could promote more innovative measures to reduce car use, such as car-pools, car-sharing, out-of-town park and ride schemes.
- The rapid transit route to Northampton should not share space with road traffic and designed in a way that it can be converted into a tramway as well as extended to other areas like Grange Park.
- The cost of public transport (i.e. rail bus) is too high and too inefficient in terms of time. Hence, public transport needs to be re-evaluated and the costs need to be reduced.
- Public transport links to and from Northampton could be improved, particularly rail links. For example, the Northampton-Bedford line should be reopened (or safeguarded from development) with stations at Nun Mills Road and Great Houghton, which would serve the development area.
- The policy needs to emphasise that the location of new development should aim to achieve a balance between housing, employment, community facilities and located within close proximity to public transport/walking networks. This will help reduce the need to travel by car and encourage more sustainable uses.
- Further studies need to be undertaken to assess the impact that any growth options will have on transport corridors and the place specific sustainable transport measures that could be incorporated to address the adverse impacts. This would also help address objectors concerns in relation to specific strategic transport routes, such as the A43/A508 and the Kingsthorpe area (Northampton North), the A45 and Flore/Weedon bypass (Daventry), as well as measures being proposed (i.e. A45-M1 link road).

- The policy could be enhanced by incorporating clear targets for modal shift based upon the County Council's Transport Strategy for Growth (i.e. a 20% reduction in the modal share of car use in new developments, 5 % overall over a 10 year period).
- Work undertaken to support the Preston Green Development have suggested that a new A45/M1 link road is not required to support the delivery of this area. Improvement to the local road network and the links to the town centre would be sufficient (and preferable) to support the Northampton South East development.
- The A45/M1 link road will have an adverse environmental impact, increase pollution and only serve to relocate congestion rather than solving it. It is contrary to the objective of encouraging a modal shift, etc.
- The policy approach is unrealistic in terms of trying to deliver sustainable modes of transport and altering travel behaviours. This policy has failed in large parts of the country.
- A National Express coach station should be provided on the edge of Grange Park as coaches pass Northampton on the M1 every few minutes. This would make it easier to travel to London, without relying on trains.
- Dedicated school transport could prevent congestion and parking issues associated with the school run.

Joint Planning Unit Response

The transport strategy will evaluate the existing infrastructure and improve it, where necessary and take all the necessary measures to encourage more sustainable modes of transport. The provision of any new road infrastructure will be considered as a last resort for combating congestion and promoting more sustainable modes of transport.

Evidence bases such as the SA and transport studies will help assess the impact of the growth options on the capacity of the existing transport infrastructure, how the options compare against each other and the measures that may need to be taken to eliminate/minimise any adverse impacts. Whilst the IDP will identify all the investment that may need to be taken to improve the transport infrastructure, the sources of funding and the implications of the options and ensure that funding is likely to be available. This will ensure that the required transport infrastructure will be delivered to support any growth and be phased with the delivery of that growth.

The JCS will need to acknowledge that the transport strategy pursued will differ between urban and rural areas, as well as provide a greater level of detail in relation to the measures that will be promoted in strategic locations, to encourage more sustainable modes of transport.

The efficiency and cost of public transport is currently being explored in the evidence base that is being collected. The final transport strategy for the JCS will include details of addressing these issues.

The SA process will try to ensure that all the policies in the JCS document are aiming to achieve a right balance between jobs/homes and other facilities in different places in the JCS area. This will help reduce the need to travel by car.

Recommended Action

Based upon the evidence base that has completed, the PSJCS identifies a clear transport strategy that clarifies what actions are needed, where and when, in order to ensure that locations for growth will not result in an unsustainable increase in congestion and promote more sustainable modes of transport.

Question 27

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

Summary of Representations

Total	Support	Object	Gen. Comments
852	82	717	53

Summary of issues raised by objectors

- The proposals will result in the coalescence of the villages of Moulton, Boughton and Overstone-Sywell. Maintenance of a strategic gap between Northampton and these villages would address this issue.
- The case for locating employment in close proximity to the University is not convincing. Furthermore, the university has little land to expand. Although, Moulton College has a large amount of land, this is largely inaccessible.
- Growth should be focussed on brownfield sites, not urban extensions into green field sites.
- Infrastructure provision associated with this extension is uncertain and theoretical. Road conditions are already beyond capacity and unsafe. In particular, Billing Road, and its intersections; the roundabouts at Round Spinney, Lumbertubs Pub and St Gregory Road; the main road through existing villages; Boughton Green Road; the Cock Hotel Junction and A43.
- Public and private transportation links; utilities (including broadband), schools, doctors, dentists, hospitals, green space, leisure facilities and policing all need to be provided and/or investigated further before this level of development is committed to.
- Concern that developers will not put adequate infrastructure in place to accommodate this development.
- There is much wildlife in this area that would be adversely impacted on by the proposed development. Similarly, the development would reduce biodiversity
- This proposed growth will adversely impact on existing communities, be detrimental to an identified attractive landscape in this area, for both local and future residents. This landscape has been designated medium to high value in studies commissioned by the Joint Planning Unit and should not be developed
- It would be desirable to keep the urban development of Northampton to the Northampton side of the M1 and it is not clear how the Northampton North Option will deliver reduced levels of deprivation and aid in regeneration.
- The Option proposes development in a floodplain and development will exacerbate existing flooding and there is no evidence that the potential for flood risk can be mitigated by Sustainable urban Drainage Systems (SuDS).
- The proposal will build over good arable farmland that that could be used for food production should be protected.
- The proposed development will result in increased traffic high level of noise, dust, lighting and traffic that will adversely affect the amenity of persons living in this area and new realignment of roads associated with the development, such as the A43, will result in noise and traffic that would adversely affect the amenity of existing residential areas. Noise from new industrial units will have

a similar effect. The proposed development would result levels on already substandard and congested roads. These traffic levels would also compromise safety for pedestrians and property.

- There are already more than 5000 unoccupied homes in Northampton. There is no need to construct more.
- Not enough jobs will be provided within this extension.
- This development is completely foreign to the neighbourhood.
- Realignment of the A43 would be an inefficient use of land. Furthermore, the A43 would need to be made into a dual carriageway to provide capacity for existing development, let alone that proposed.
- The cost of this development is huge and cannot be afforded by the Government in its present fiscal state. Furthermore, it would be unfair to saddle future generations with the tax burden of this development.
- The projections this urban extension is based on are outdated and inaccurate. The Barker review has been discredited. Similarly, the RSS figures are under review. As such, the presumption behind this urban extension is flawed.
- Past experience indicates that insufficient infrastructure will be built and the homes constructed will be of a poor quality.
- Development will spoil the setting and character of villages in this locality.
- There are high voltage power lines and large gas pipelines located in this area that would conflict with housing development.
- Development of two extensions to the villages of Moulton and Overstone, rather than a ribbon development as proposed, would be more suitable.
- Given this area's proximity to the university, student accommodation appears to have been overlooked.
- The level of development proposed in this locality would reduce the price of existing houses.
- The ground in this area consists of clay overlaying sand and is therefore unstable. As such, it is not suitable for development.
- The fields in these areas have been used in a recreational capacity for several decades by local residents. This could not occur if this area is covered in development.
- The scheme is lacking in clarity and detail. In particular, the maps provided are too vague and the exact area affected cannot be accurately gauged.
- More employment land is needed rather than new homes, as there is a lack of jobs in Northampton.
- The new housing, particularly affordable housing, will increase crime rates in this locality.
- The evidence base for this option is incomplete, particularly with regard to infrastructure provision.
- A new settlement between Northampton and Wellingborough is more suitable.
- These homes will house more immigrants, which the country does not need.
- The housing proposed will put pressure on the redevelopment of Sywell airport. In particular, there is potential for air accidents and noise to adversely impact the new homes.
- The proposal will not create jobs and there is a glut of unoccupied industrial units in this area. This development will only serve to increase traffic and warehousing close to Sywell airport and paid for out of the public purse.

- The proposal is developer led and they will only construct high density, small units for sale
- The suggestion that this area can be brought forward for development early in the plan period is worrying as it indicates pre-judgement of this site.
- Development of land north of Round Spinney, Pine Ridge and the Brittons Drive developments would be precluded by the Daventry Local Plan as this land is designated a Rural Access Area. Similarly, Overstone Park is designated a green wedge in the Daventry Local Plan and development is therefore precluded.
- Dallington Grange should be allocated as a strategic site given its large contribution to housing numbers. Development at Buckton Fields and Dallington Heath/Grange has been previously refused by Northampton Borough Council due to traffic issues. As such, this allocation should be removed from the plan. More housing and jobs need to be allocated to this Option to achieve the critical mass needed for infrastructure and transport
- Development to the north of Northampton should be expanded to include infill areas at Moulton and Boughton to link with allocated land at Buckton Fields.
- Does not support park and ride facilities. This Option is not sustainable as it has poor links to the M1 and rail routes. Specific reference should be made to pedestrian, cycling and public transport linkages with the Weston Favell District Centre.
- This development will result in part of Daventry District being administered by Northampton District Council
- Key criteria for the selection of these urban extensions should be; sufficient critical mass to justify substantial investment in related infrastructure, existing or improved public transport accessibility, scope for high quality complementary land development which would be attractive to the market; flood risk; minimising environmental impact; and effects on any designated sites, important landscapes and biodiversity.
- Consideration should be given to the effect on listed buildings, Overstone Park, undesignated archaeology, Boughton Conservation Area, Holly Lodge (Grade II), scheduled ancient monument and Roman and Medieval archaeology.
- A suitable buffer zone should be provided around the Pitsford Reservoir Site of Special Scientific Interest (SSSI).

Joint Planning Unit Response

The JCS is based on sound evidence and the policy approaches reflect the key objectives and priorities of sustainable development. It was appropriate to give consideration to all potential sites.

PPS4 encourages networks of knowledge driven or high technology industries. The JCS in line with Government advice and its evidence base on employment provision identifies a Technology Realm. The proposed location is close to a number of higher education institutions including the University of Northampton, Northampton College and Moulton College and within a proposed knowledge based corridor within the Oxford to Cambridge University Arc. The site is deliverable for Technology Realm purpose within the plan period.

The JCS incorporates the principles of good design as outlined in PPS1 and seeks to minimise the impact of development on local character and national heritage. Policies will ensure environmental protection and enhancement of important landscape and sites of biodiversity importance.

The provision of essential facilities as part of development is at the centre of the sustainable development agenda and the number of jobs to be created will be balanced against housing development and infrastructure.

A Sustainability Appraisal(SA) is being completed to assess all the options against the SA framework. This will ensure that measures are incorporated into policies which aim to minimise/eliminate any adverse economic, social and environmental impacts of the options, in order to promote the sustainable development of the JCS area.

An Infrastructure Delivery Plan (IDP) is currently being completed. This will examine the capacity of the existing infrastructure, determine when and where new provisions will be required, and adequate funding is available in order to support the level of growth being proposed. Additionally, it should be emphasised that the IDP will be supported by the collection of other evidence bases such as the Water Cycle Study(WCS), transport study etc.

The JCS reflects the key objectives and priorities of the Sustainability Appraisal (SA) and the development proposals have to be screened against these objectives. All the sites are subject to SA and a Strategic Flood Risk Assessment (SFRA) undertaken. These should provide appropriate framework for guiding the development on the site.

During the course of plan preparation it has become evident that the scale of development as required by the RSS cannot be delivered within the plan period to 2026 due largely to the economic down turn. Consequently the scale of development as required by the RSS has been reduced for the JCS in line with a deliverable projection and reflecting local needs.

The plan is for a 15 year period and it is therefore unreasonable to expect the current state of the economy to continue throughout the Plan period. The projected growth and the assumptions made are based on reasonable prospect of economic recovery but striking a balance and reducing the level of growth in this location is considered appropriate. It is also acknowledged that the approach and the assumptions made will be reviewed from time to time through the AMR.

The JCS should only bring forward sites that enable development to make maximum benefit to the communities in a sustainable manner. In the light of the reduced housing delivery for West Northamptonshire it is suggested that the SUEs proposed in the EJCS should be reassessed to ensure that the development that is brought forward through the next stage of the JCS is the most sustainable and deliverable option set against a reduced housing delivery.

Recommended Action

No Change in policy direction – However the number of the housing units in the PSJCS have been reassessed to align with the reduced housing delivery within the plan period. Consequently the SUE at Northampton North has been reduced to 2,000 dwellings and associated development as presented in the PSJCS.

Question 28

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

Summary of Representations

Total	Support	Object	Gen. Comments
5958	89	5789	80

Summary of issues raised by objectors

- This Option is unsustainable, too vague and meaningless and fails to meet the objectives of the strategy.
- The area is remote from Northampton and other significant centres. It lacks adequate provision for employment land. Unsure what sustainability means and no detail provided on how carbon footprint will be reduced.
- Level of affordable housing is unacceptable, as it will encourage anti-social behaviour and crime.
- Rapid Transit System will take a considerable length of time to complete.
- Concern about the ability of new developments to deliver infrastructure, roads and services and waste disposal in the area will worsen. Rail services will not cope with growth. Danger of approval without any agreed infrastructure. Houses will be built prior to this, which will encourage people to Milton Keynes.
- Concern about adequate water supply in the area and further growth in an area with infrastructure deficit. The green infrastructure value of the Houghton land and the hillside villages’ landscape on the ridge above the flood plain provide strong reasons not to develop this area.
- Increase air, noise and light pollution. A45 improvement and the planned new roads would increase pollution.
- Loss of landscape value particularly the sensitive ridge land along the A428 and Bradfield has numerous constraints including a ‘significant’ conservation area, Biodiversity Action Plans (BAP) sites and historic buildings.
- The proposed would destroy an area that contains the habitats of many forms of wildlife, disrupt and threaten an area that is rich in history, listed buildings and a registered historic park and garden and several archaeological sites such as Neolithic, Bronze Age, Roman ruins as well as Scheduled Monuments.
- Flood risk has not been properly assessed and this option will further exacerbate flood risk in this area due to increased run-off and reduced infiltration.
- This Option will envelop and destroy several villages and blight the landscape. In particular, Great and Little Houghton should be protected and Preston Deanery should remain as a separate settlement. All growth should be accommodated on brownfield sites, rather than the greenfield sites as proposed.
- The evidence base for this option is incomplete and unjustified. As such, this Option is not sound in terms of Planning Policy Statement 12: Local Spatial Planning. The Option appeared ‘out of the blue’ when 90% of the area

covered by the Preferred Option was not included in the options for Northampton's expansion identified by consultants in 2007 and subsequently put out for consultation in the 'Issues and Options' document. It is hard to avoid the conclusion that the decision to add the Northampton South-East Option has either been taken arbitrarily, as a desperate measure to provide the required housing numbers, or is in response to developers' plans already in existence. The housing requirement figures are over inflated, outdated and unrealistic and there is no evidence that a proper assessment of the implications of the option.

- Loss of prime agricultural land at a time when the Government is encouraging domestic food growth and local employment.
- Land allocated for low density, low paying, B8 (Storage and Distribution) warehousing employment should instead be used for houses. The job per dwelling ratio is incorrect and unachievable, particularly in light of the current recession. Development near M1 will encourage B8 employment uses
- The draft strategy precludes the investment in road infrastructure to the north that would release land for the "University Arc" between the University, Moulton College and Northampton College. The opportunity to generate a "knowledge corridor" to the north of the new city centre will be undermined by this Option.
- This Option appears to have been conceived to support an aspiration for Northampton to become a city against the wishes of local people.
- This Option will cause house prices in this locality to fall and will produce a dormitory area.
- This Option represents an undesirable elongation rather than compaction of the urban form. Large dense development like that proposed will become future slums.
- Loss of rural recreation and leisure space.
- The land in this area is unstable being underlain by a bed of clay then sand.
- Much of this land is criss-crossed by public rights of way that may be obscured by development.
- The planners are supporting development of greenfield sites to raise more money for infrastructure.
- Plan does not address climate change and contains insufficient detail to indicate how it will be achieved. In particular, no infrastructure or funding plans are presented and the Highways Agency has not been consulted.
- The proposal M1/ A45 road link and associated junctions would affect and disrupt existing traffic flows and the new A45 to M1 trunk road will not be able to accommodate traffic from this growth. The proposed road and public transport links to Northampton are inadequate and will become clogged with this level of development. The new roads will increase the number of cars and contribute to greenhouse gas emissions and are therefore contrary to national policy.
- Rapid transport link following the old railway route is ill conceived as it will require two level crossings and will exacerbate traffic problems for the south approach to Northampton.
- What is a Rapid Transport Link? A Tram? This needs to be made clearer.
- The agricultural land is required to meet sustainable food targets and encourage the growth of the bio fuel industry

- The empty properties in Northampton must be sold or redeveloped before new development takes place.
- Limited growth could be directed toward the villages.
- Proposals will have adverse impacts upon the resident's quality of life in rural areas affected by this extension
- Developer contributions will be insufficient to fund the infrastructure proposals.
- The development of brownfield land should be prioritised above greenfield sites.
- Existing employment or proposed employment growth is insufficient to meet the need of the proposed extension.
- The Emergent JCS does not adequately reflect the proposals in the Issues and Options stage or the consultation representations.
- Insufficient evidence base to justify the preferred options within the EJCS.
- This Option, together with previous extensions, has done nothing to encourage the regeneration of Northampton.
- Consultation has been insufficient, unclear and hurried. The process has lacked transparency.
- Proposal will discourage high tech industry to be located in this area.
- Improvements to the M1/A45 link will cause increased congestion to the M1.
- To develop the transport capacity at corridor between Wellingborough and Milton Keynes/Junction 14, M1 where capacity is available, would be preferable. The country cannot afford to invest large sums of money into dual carriageway construction.
- Improvements to existing infrastructure and new infrastructure would be required before any new houses are built. This is unlikely to occur.
- Vehicular access to the site is insufficient and no indication of an implementation plan or cost projections of providing infrastructure.
- New road and moving Junction 15, M1 south would create huge difficulties in reaching Brackmills and Grange Park industrial estates.
- Development would be suitable on land either side of the M1 where landscape has already been disturbed.
- Villages within the development area would need substantial green belts.
- Will impact on visitors to the villages and tourism to the area.
- Flooding impacts at Billing have not been considered – damaging implication for tourism in the area. Drainage for Northampton area is already unable to cope and development is contrary to the requirements of Planning Policy Statement 25: Development and Flood Risk.
- Proposed link road would isolate rural areas to the east from Northampton.
- Option is unacceptable Little Houghton Conservation Area and numerous listed buildings will be significantly affected.
- Affordable housing percentage is unacceptable. Intermediate housing is unlikely to be filled by key workers and will be used for social rented accommodation.
- Lack of assessment of South East Option in terms of Social Impact Assessment / Traffic Assessment / Air Quality Assessment / Biodiversity Impact Assessment / Environmental Impact Assessment / Flood Risk Assessment / Geological Survey.
- No information provided on location of employment elements.
- Identity and social fabric of self-sustainable villages will be lost.

- No support for either of the extension options.
- Development at the South West must not continue there is already unused allocated land in this area.
- The South East extension does not appear in its current form in the Issues and Options consultation document.
- Plan will not create a distinctive character to the area and may lead to loss of green rural land to development, which will result in the engineering of unnatural open space on the same land is nonsensical.
- Historically, modal shift does not occur. If people have cars they will use it. This is a fantasy.
- Plans appear to be developer led.
- Rather than providing a rapid bus transit along the old railway route, the Bedford/Northampton railway line should be reinstated.
- The West Coast Mainline is already at capacity and will not be able to cope with further development.
- Distribution of housing in West Northants should be more evenly distributed across the area.
- The provision of services and facilities should be a given in any large development and should not be used to justify the extension at Northampton South East.
- This option is contrary to the Vision and Objectives within the Emergent JCS. Document is contrary to the Planning Policy Statement 12: Local Spatial Planning tests of soundness as it is neither justified nor effective.
- Detachment due to A45 will not encourage sustainable modes of transport, walking cycling, into Northampton Town Centre.
- Insufficient sewerage capacity to accommodate South Eastern extension.
- Development will be a repeat of past mistakes
- Existing transport and infrastructure need of the area must be addressed and no evidence to suggest the Highways Authority supports the new link road.
- The new A45/M1 link road will obliterate Quinton and the provision of a second junction to the M1 at such close proximity to other junctions would be rejected.
- Construction of this option and supporting infrastructure would cause significant disruption.
- Phased finance and/or roof tax should not be used to finance infrastructure.
- No/insufficient evidence of alternative sites has been provided to indicate that this site is the only reasonable alternative.
- It is possible to place high-density appropriate housing in areas where infrastructure already exists, minimising urban sprawl and construction costs.
- The new A45-M1 link will form a physical barrier between the villages and Northampton.
- Development will result in adverse impacts upon Great and Houghton and extensions to Little Houghton Primary School will ruin its appeal and character as small village school.
- The proposed road runs in close proximity to the Yardley Chase Site of Special Scientific Interest (SSSI), a major breeding ground for a number of rare and threatened species.
- The Plan is focussed towards directing traffic away from Northampton.

- Plans cannot preserve the existing green infrastructure by developing the area.
- There is no local need for this scale of housing.
- Loss of public rights of way.
- Funding for the required level of services and facilities cannot be guaranteed.
- House prices in the villages will substantially decrease.
- Will result in loss of village community and a decline in the quality of life enjoyed by exiting residents.
- No consistencies exist within the Plan (job figures) and the document, in places, is difficult to understand. The consultation has been insufficient and the Brafield exhibition only occurred after the close of the consultation period.
- Northampton General Hospital is at capacity and will not cope with extra demand from new residents at south-east Northampton. Other local medical/dental facilities are also at capacity.
- Northampton South East will affect the Upper Nene Gravel Pits potential Special Protection Area.
- Extending to envelop villages at the rural periphery of Northampton is contrary to a number of the objectives proposed in the Emergent Joint Core Strategy (objectives, 5, 6, 7, 8, 10, 16).
- Concern regarding the level of policing that will be available.
- No commitment to provide a secondary school.
- Difficulties of estimating industrial/commercial growth implies labour demand will be equally as difficult to gauge over next 25 years.
- Insufficient parking available in town centre and at railway station.
- Schools are oversubscribed, especially Caroline Chisolm – development of Northampton South East will increase the pressures on school places.
- High-rise accommodation on brownfield sites would reduce need to build on greenfield sites.
- Undeveloped allocations must be delivered before new housing sites are allocated.
- Northampton has accepted disproportionate levels of growth against the national average. The extent of growth could damage its heritage
- This option may have an adverse impact on the Upper Nene Valley SSSI and potential Special Protection Area (pSPA).
- The relationship between this area and Grange Park, Wootton Fields and Brackmills needs careful consideration to ensure this area is enhanced rather than adversely affected by development.
- This should not be the only option with an improved and direct link to Castle Station when there are poor links from all over the town. The respondent wants to see a new commuter station (West Coast Main Line) with modern facilities, safe and easily accessible parking and safe cycle routes because Castle Station is no longer fit for purpose.
- Growth to the North of Northampton would be closer to the University and would be capable of expanding current industrial areas it would also be close to Kettering and Wellingborough which would encourage movement to Northampton and benefit regeneration.
- The diagram in the EJCS is blurred. The Issues and Options document was significantly clear to provide an effective basis on which to provide comments.

- Additional rail stations should be built at Milton Malsor, Roade, Castlethorpe, Althorpe and Daventry International Rail Freight Terminal (DIRFT).
- Rather than build a new M1/A45 link, the existing A509 from Wellingborough to Milton Keynes should be upgraded. This would follow a more direct route and land exists along its length to allow widening.
- The proposed housing numbers should be aligned with natural population growth.
- Questioned the justification for continued development to North of Rothersthorpe.

Suggestion

It was suggested that development would be more sustainable if spread evenly around Northampton. It was also suggested that cross referencing settlement growth options to key transport requirements and phasing delivery identified the RSS would be beneficial.

Joint Planning Unit Response

The JCS is based on sound evidence and the policy approaches reflect the key objectives and priorities of sustainable development. It was appropriate to give consideration to all potential sites.

Planning for growth and accepting increased development should bring benefits and/or improvement to Northampton in terms of new infrastructure and community facilities. The provision of essential facilities as part of development is at the centre of sustainable development agenda and the number of jobs to be created will be balanced against housing development and infrastructure.

The option supports the Vision and Objectives in the Emergent JCS and accords with the spirit of Planning Policy Statement 12. Policies will ensure environmental protection and enhancement of important landscape and sites of biodiversity importance and there is no evidence that proposal will lead to diminution of the character of the local area. Policies and proposals in the JCS will respect local character and protect open spaces

There is no evidence that development in this location will have an adverse impact on the Upper Nene Valley SSSI and potential Special Protection Area (pSPA) or undermine the integrity of the area's amenity.

The suggested change in terms of the distribution of housing development runs counter to Government advice. 'Pepper potting' or spreading development in clusters will increase cost of infrastructure and introduce development in areas where this may not be appropriate. The IDP will demonstrate the phasing and delivery mechanisms of the proposals.

The JCS reflects the key objectives and priorities of the Sustainability Appraisal (SA) and the development proposals have to be screened against these objectives. All the sites are subject to SA and the Strategic Flood Risk Assessment (SDFRA). These studies provide an appropriate framework for guiding the development on the site.

During the course of plan preparation it has become evident that the scale of development as required by the RSS cannot be delivered within the plan period to 2026 due largely to the economic down turn. Consequently the scale of development as required by the RSS has been reduced for the PSJCS in line with a deliverable projection and reflecting local needs.

The plan is for a 15 year period and it is therefore unreasonable to expect the current state of the economy to continue throughout the period. The projected growth and the assumptions made are based on reasonable prospect of economic recovery. It is also acknowledged that the approach and the assumptions made will be reviewed from time to time through the AMR.

The JCS should only bring forward sites that enable development to make maximum benefit to the communities in a sustainable manner. In the light of the reduced housing delivery for West Northamptonshire it is suggested that the SUEs proposed in the EJCS should be reassessed to ensure that the development that is brought forward through the next stage of the JCS is the most sustainable and deliverable option set against a reduced housing delivery.

Recommended Action

In the light of the reduced housing delivery for the JCS to 2026 the Northampton South East SUE as a significantly large allocation is not progressed forward to the Pre-Submission version.

Question 29

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

Summary of Representations

Total	Support	Object	Gen. Comments
509	73	356	80

Summary of issues raised by objectors

- The proposal is unclear with insufficient information. It does not appear to relate to the urban area or integrated into the town and would not help the town centre. It conflicts with the objective of the Northampton Central Area Action Plan (NCAAP) which aims to ‘bring employers back to the centre’ and contravenes national policy in Planning Policy Statement 4, which seeks to accommodate employment uses in urban areas.
- Doubt the suitability of this site for employment and the development at Junction 16, M1 will result in a disconnected and unsustainable business park, which would threaten Northampton’s regeneration objectives.
- Unsustainable location and poor access with no rail connection, 5 miles from Northampton and remote from existing and proposed housing areas. No evidence that this will be sustainable in the future and will be a car dependent development contrary to principles stated elsewhere in the Plan.
- Sufficient empty sites exist without creating new blots on the landscape. Economic and growth should be accommodated on brownfield land first and within walking and cycling distance of residential areas.
- The impact of development on Kislingbury, including traffic impact, visual intrusion, increased noise levels, air pollution, and smell from sewage treatment works. This will substantially reduce the quality of life in the village.
- Impact on the road network particularly M1/Junction 16 which is already too congested. Consideration could be given to the widening of M1 to 4 lanes, but this would not solve the problem and the scale of the development would likely compromise its safe and efficient operation.
- Avoid ribbon development and coalescence with the village of Harpole and restrict development to the immediate proximity of Junction 16, M1.
- The southern part of the Sandy Lane Relief Road at Junction 15 and 15A, M1 / A43, should be development with a new commuter rail station.
- For the Junction 16, M1 proposal to be accepted, proposal for Northampton should shift along the A4500, away from the south east.
- Concerned about infrastructure inadequacy and the increased demand on water supply and the adequacy of sewers. The ongoing maintenance of Sustainable urban Drainage System (SuDs) systems and the example of Church Lane, Bugbrooke which requires massive investment in the drainage system was cited.
- Proposed bypass at Flore-Weedon south of Nether Heyford and between Bugbrooke and Pattishall linking to the proposed southeast bypass would create development opportunity in this location without affecting existing communities.

- Proposed out-of-town location site is not sustainable as it performs poorly against Sustainability Appraisal (SA) criteria and its proximity to the M1 will make people travel to Milton Keynes rather than try to access the town centre. It will encourage greater car use which conflicts with environmental and health related priorities.
- It is in an area of unstable glacial valley floor and in the vicinity of floodplain and will increase flood risk downstream to Kislingbury and Northampton.
- The impact on rural setting, loss of valuable agricultural land and countryside, unacceptable loss of landscape, partially excavated Roman settlement, verdant water meadows, ridge and furrow field impacts and lessening of the separation between Northampton and settlements to the west.
- Failure to recognise the importance of the village life of everyone living in Harpole. The proximity to the Bugbrooke Meadows Site of Special Scientific Interest (SSSI) and the visual impact on sensitive area and the potential destruction of sites of significant heritage and archaeological interest, the landscape, the countryside heritage, character and community of the village or Harpole. It will open up an unspoilt part of a beautiful village.
- The evidence for employment development in this location is inaccurate and based out of date growth projections set out in the RSS not robust or credible. It is not supported by robust evidence such as the draft Strategic Employment Land Assessment (SELA) report and as such is contrary to the requirements of Planning Policy Statement 12. Further evidence base is therefore needed.
- The area shown (176ha) is much higher than the area shown in the SELA report (40.4ha) and projects growth beyond the designated West Northamptonshire Development Corporation (WNDC) boundaries. The higher figure needs to be justified and tested through Sustainability Appraisal.
- Reduced the requirement for development by distributing development in villages and the centre of town.
- There is a danger that if this development proceeds then there would be future backfilling of development along the A4500 to Northampton.
- New industrial units are not needed when there are many vacant units such as warehouses in Grange Park, Pineham and Swan Valley and empty development sites at Brackmills, Moulton Park, Round Spinney and Lodge Farm, which should be developed first. Do the people of Northampton want all the gateways to their town to be guarded by distribution centres?
- With some 5 million square feet of available industrial warehouse no further warehousing is needed.
- The town has already expanded far enough to the west.
- The site will become a potential target for criminals at night.
- Low density development that is impossible to serve by public transport in this location may detract from Daventry, undermine its regeneration and compromise the investment and job growth at DIRFT.
- The development will produce jobs mainly in the logistics industry and warehousing, which generate few jobs. It is unclear how the job figure was calculated and there is doubt about the deliverability of the 11,500 jobs.

Suggestion

It was suggested that better sites exist which could accommodate this type of development such as Daventry International Rail Freight Terminal (DIRFT) and the Northampton South East Option, which could provide a mixed use urban extension.

Joint Planning Unit Response

The JCS is based on sound evidence and the policy approaches reflect the key objectives and priorities of sustainable development. It was appropriate to give consideration to all potential sites. The site is indicated in the Strategic Employment Land Assessment (SELA) as a development opportunity to support the economic growth of the area.

The JCS reflects the key objectives and priorities of the Sustainability Appraisal (SA) and the development proposals have to be screened against these objectives. All the sites are subject to SA and the Strategic Flood Risk Assessment (SFRA). These should provide appropriate framework for guiding the development on the site.

The Emergent JCS advises that at the time of publication that the evidence base for employment demand and supply was still being developed. This element of the evidence base has now been delivered in the form of a report entitled West Northamptonshire Employment Land Study (WNELS), July 2010.

During the course of plan preparation it has become evident that the scale of development as required by the RSS cannot be delivered within the plan period to 2026 due largely to the economic down turn. Consequently, the scale of development as required by the RSS has been reduced for the JCS in line with a deliverable projection and reflecting local needs.

The reduction in the housing delivery reflecting local needs has a consequent implication for employment growth and job requirements. The population modelling has determined that fewer jobs will be required to support an appropriate balance of homes and jobs. Consequently, strategic allocations of the scale suggested at Junction 16 are unlikely to be required to support the plan objectives or maintain an appropriate balance between homes and jobs.

Recommended Action

Following is reassessment as part of a sustainable strategy for an appropriate balance of homes and jobs based on reduced housing growth a strategic employment allocation at Junction 16 is not progressed forward to the PSJCS.

Question 30

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

Summary of Representations

Total	Support	Object	Gen. Comments
834	73	698	63

Summary of issues raised by objectors

- The Option is too vague, short on details and the plan is too blurred and difficult to read.
- Concerned about Northampton as the focus for development
- Not sure if Upton Lodge is part of the overall expectation of 6900 dwellings
- The housing requirement figures are based on the East Midlands Regional Assembly estimate and this is no longer accurate and in need of a full review.
- There are sufficient empty, abandoned disused buildings and brownfield sites to supply 70% of a reasonable growth capacity for the town.
- Given the state of the economy and the number of vacant and unsold properties around it is doubtful whether there is demand to justify the level of housing growth this level of development and the funding required.
- Concerned about concreting over the countryside and no evidence to demonstrate that this is sustainable and beneficial in Northampton
- Concern that the area is probably too big and on a scale (5 miles long and 2 miles wide) that no other area of Britain has proposed over the last 5 years
- The proposed development is in prime agricultural area, highly visible, sensitive and a prominent landform. It is in an area of unstable glacial valley floor, prone to flooding and will result in greater downstream flood risk to Kislingbury and Northampton and will not assist in improving air-quality. It will deny local people access to land of a high recreational value
- Proposal extends development into an area that is of high priority for the restoration of acid grassland and heath land habitat and will destroy sites of significant heritage and archaeological interest such as Harpole's Roman Villas, iron age round houses, monastic fishpond, a field and hedgerow system established by an Enclosure Award of 1778, ancient charities, woodlands, Georgian parkland, manorial mill and sandstone farmers houses with historic occupation back to the civil war and significant Romano-British villa site at SP 684599.
- Growth should be contained within existing designated area and save our village from destruction and countryside buffer between Northampton and Harpole/ Kislingbury should be maintained.
- Concerned about to high levels of air pollution that will impact Harpole and the visual impact of development on Pineham is unacceptable already and Harpole should be safeguarded and the area from Nobottle Road to Dallington Grange is less critical and could be linked through to Welford Road.
- The proposal will destroy greenbelt and the character of the area and concerned that many villages and areas such as St. Crispin's hospital site and

Kislingbury which already suffer light pollution from existing industrial development and the proposals will be worse off.

- Development should be limited at the ring road and not sprawl. The realistic alternative is Northampton North, South and North East.
- Building relief road is an excuse for a massive land-grab and the present road systems including: Northampton to Weedon Road (A4500), Harlestone Road (A428); Sandy Lane; Duston Road and Bants Lane are congested and inadequate.
- Identification of a town centre, without specifying the scale, location and form of such a centre is in conflict with PPS12 and raises the question of soundness.
- The proposed jobs will take up a large land area involves low skill levels and low occupancy rates and the number of jobs will not support housing growth.
- Develop the local area with the local community in mind first. Concerned development is there to solely to facilitate funding to complete the North-West Link (Sandy Lane Ring Road).
- Place high-density housing in areas where infrastructure already exists.
- The proposed approach to infrastructure is too light and the sewerage system is already at capacity.

Suggestion

It was suggested that the distribution of housing should be in clusters across the county keeping small communities and with infrastructure that can realistically be funded. It was also suggested that the requirement for a new local centre would be better met by designating Sixfields a District Centre, given its links with Northampton west and the existing community.

Joint Planning Unit Response

The choice of sites and location of housing development in the Emerging JCS were influenced by Government policy and the desire to reflect the principle of sustainable development.

Planned growth and targets set for housing and other developments are justified by sound evidence and the scale of development proposed will ensure the delivery of appropriate and overall development requirements by 2026. There is no evidence that available empty premises and underused land will be sufficient to meet the needs of West Northamptonshire over the planned period.

The scale of development is based on projected population and the designation of the area as one of growth points in the UK. The general review of the region's population and employment assumptions underpin the need to plan ahead.

The JCS reflects the key objectives and priorities of the Sustainability Appraisal and the development proposals have to be screened against these objectives. All the sites are subject to SA and a Strategic Flood Risk Assessment (SFRA). These should provide appropriate framework for guiding the development on the site.

The JCS incorporates the principle of good design as outlined in PPS1 and seeks to minimise the impact of development on local character. Commitment to EU

regulations and environmental protection means that important landscape and sites of importance and biodiversity are carefully considered at every stage of the process.

The provision of local shops and essential facilities as part of development is at the heart of sustainable development agenda and the number of jobs to be created will be balanced against housing development and infrastructure.

Although the JCS does promote housing growth across West Northamptonshire, the suggested change which appears to seek an even distribution of housing development throughout the area runs counter to government advice. 'Pepper potting' or spreading development in clusters will increase cost of infrastructure and introduce development in areas where this may not be appropriate.

During the course of plan preparation it has become evident that the scale of development as required by the RSS cannot be delivered within the plan period to 2026 due largely to the economic down turn. Consequently the scale of development as required by the RSS has been reduced for the JCS in line with a deliverable projection and reflecting local needs.

The plan is for a 15 year period and it is therefore unreasonable to expect the current state of the economy to continue throughout the period. The projected growth and the assumptions made are based on reasonable prospect of economic recovery but striking a balance and reducing the level of growth. It is also acknowledged that the approach and the assumptions made will be reviewed from time to time through the AMR.

The JCS should only bring forward sites that enable development to make maximum benefit to the communities in a sustainable manner. In the light of the reduced housing delivery for West Northamptonshire it is suggested that the SUEs proposed in the EJCS should be reassessed to ensure that the development that is brought forward through the next stage of the JCS is the most sustainable and deliverable Option set against a reduced housing delivery.

Recommended Action

No Change in policy direction – However the size site and number of the housing units should be reassessed to align with reduced housing delivery within the plan period. Northampton West SUE is reduced to a housing delivery of 1,500 dwellings as proposed in Policy N4 of the PSJCS.

Question 31

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

Summary of Representations

Total	Support	Object	Gen. Comments
1253	86	1094	73

Summary of issues raised by objectors

- As a market town, Northampton was not designed to accommodate this level of growth. The proposed growth is designed to enable Northampton to acquire city status and will promote commuting and contribute to Northampton eventually becoming part of Milton Keynes. The plans showing this option are very blurred and difficult to read
- This appears to be a developer led option and will depreciate homes in this area. Home buyers/families who want to live in this area will not buy these homes, given its proximity to noise and pollution from the M1 and will only be bought by investors.
- Development should not go beyond the Development Corporation’s boundaries. The proposed housing would mean more immigrants and overpopulation of the area.
- The strategy will need to set aside a number of hectares of land for burials.
- Adopt sustainable approach to development under the revised RSS.
- The housing requirements are no longer accurate and the housing growth figures set out in Table 6.4 lack supporting evidence, and are therefore unrealistic.
- Employment uses will comprise largely warehousing and distribution. These uses have a low employment ratio and employ largely unskilled workers.
- The employment land area will be insufficient given the number of homes proposed. This will exacerbate out-commuting and traffic congestion on surrounding roads.
- The previous Urban Capacity Study undertaken by Northampton Borough Council indicates that 70% of the proposed housing growth could be accommodated on brownfield sites. Furthermore, there are many empty and derelict sites that should be developed before the greenfield land in this area is developed.
- The evidence base is incomplete, particularly with respect to flooding and infrastructure. This site regularly floods and this cannot be overcome by Sustainable Urban Drainage Systems (SuDS).
- Concerned about existing physical infrastructure (potable, waste and storm water; roads) and social (e.g. children school placements, hospitals, GP surgeries, emergency services, police, Churches, open space) to support the level of development. Infrastructure is insufficient for recently established communities in West and South Northampton. Furthermore, the funding for this development is questionable, given the current recession and the need to reduce Government deficit.

- This option is unsustainable and this level of development would give rise to air, noise and light pollution and further decrease traffic safety. The proposed development may give rise to land slippage as this area is underlain with a bed of clay then sand
- New development should seek to maintain the villages as separate settlements through the use of green infrastructure.
- This area is prime agricultural land that will be occupied by development at a time when, due to global warming and import restrictions, more food needs to be grown in the UK.
- This extension will be detrimental to the character, amenity and way of life found in the surrounding villages and it would lead to loss of local recreation ground, threaten archaeological sites, wildlife habitat, and restrict the continued viability of the golf course.
- Collingtree should be maintained as a separate village, through the use of green infrastructure. This village has 10 listed building entries include a Grade II* church.
- This option will increase vandalism and anti-social behaviour due to the component of affordable housing proposed and the congregation of young people in this area
- Maximise high-density development where infrastructure already exists to minimise urban sprawl and construction costs.
- This location would be better suited to industries requiring heavy goods movements to maximise the benefits of its location near the M1 and A43.
- House designs will not be sympathetic to existing structures. The level of development proposed will result in years of disruption to existing communities, during construction.

Suggestion

A reservoir should be built for storm water to drain into. The area around this can be used as a wildlife sanctuary. The area to the rear of Upton Grange should be developed and this site should be developed as a woodland or wetland area to promote tourism given the flood risk in this area. A rail link at Blisworth on the main line could enhance Northampton South's accessibility.

Joint Planning Unit Response

The scale of development of in the Emergent JCS is based on projected population and the designation of the area as one of growth points in the UK. The general review of the region's population and employment assumptions underpin the need to plan ahead.

The JCS evolved from Central Government planning agenda and the scope and contents are guided by policies and procedures set out in PPS12. There is therefore no evidence that the plan is developer-led.

The JCS incorporates the principle of good design as outlined in PPS1 and seeks to minimise the impact of development on local character. Sustainable development can be implemented in this location in a way that reduces the impact on the environment and minimises any harmful effect. The JCS objectives and emerging policies will ensure the suitability of the development. High design standards will be

achieved and the implementation of the policies and strategies will reduce crime and minimise the fear of crime.

All identified sites included in the JCS have been the subject of rigorous testing against the key objectives and priorities of the Sustainability Appraisal (SA) carried out by independent consultants. The development proposals have also been tested in the light of evidence from Strategic Flood Risk Assessment (SFRA) and Appropriate Assessment (AA) reports and comments received during the various consultation stages. Cumulatively these inform and provide appropriate framework for guiding the choice, scale and appropriateness of development sites taken forward.

It is acknowledged that the provision of addition infrastructure would be required and the JCS is proactive about this through the preparation of Infrastructure Delivery Plan (IDP) as part of the Plan. A schedule of infrastructure and how this will be delivered will be provided as part of the JCS.

The Emergent JCS cautions that at the time of its publication this Option was insufficiently developed in terms of effective flood mitigation and physical vehicular access to the site. The flood mitigation investigation has now been completed and it is advised that the reconfiguration of the golf course as proposed will provide a positive environmental impact to flood alleviation from the Wootton Brook.

The growth Option and the scale of development are based on sound evidence and influenced by Government policy and the desire to reflect the principle of sustainable development.

During the course of plan preparation it has become evident that the scale of development as required by the RSS cannot be delivered within the plan period to 2026 due largely to the economic down turn. Consequently, the scale of development as required by the RSS has been reduced for the PSJCS in line with a deliverable projection and reflecting local needs.

The plan is for a 15 year period and it is therefore unreasonable to expect the current state of the economy to continue throughout the period. The projected growth and the assumptions made are based on reasonable prospect of economic recovery but striking a balance and reducing the level of growth. It is also acknowledged that the approach and the assumptions made will be reviewed from time to time through the AMR.

The JCS should only bring forward sites that enable development to make maximum benefit to the communities in a sustainable manner. In the light of the reduced housing delivery for West Northamptonshire it is suggested that the SUEs proposed in the EJCS should be reassessed to ensure that the development that is brought forward through the next stage of the JCS is the most sustainable and deliverable option set against a reduced housing delivery.

Recommended Action

No change in policy direction – However the size site and number of the housing units should be reassessed to align with reduced housing delivery within the plan period as proposed in Policy N5 of the PSJCS.

Question 32

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

Summary of Representations

Total	Support	Object	Gen. Comments
834	58	333	443

Summary of issues raised by objectors

- The town will not be able to successfully attract high tech employment due to a shortage of skilled labour and no evidence of the private sector buy in.
- The development of this option is likely to adversely impact the regeneration of West Northamptonshire.
- The scale of this growth option is not justified by any evidence because population forecasts have been overestimated.
- The level of growth required has been underestimated because housing windfall projections in rural areas have been taken into account (contrary to PPS3) and housing units delivered beyond 2026 should not be considered as part of the plan’s housing targets.
- The Daventry SE growth option area will be poorly connected to the existing urban area (partly due to the existing industrial estate) and will therefore result in unsustainable levels of commuting (i.e. A45 /A5).
- The road infrastructure is already over-capacity which will raise safety issues.
- The proposed A45 bypass is not grounded in policy and is contrary to the local objective of promoting more sustainable modes of transport.
- Brownfield sites and the reuse of vacant buildings should be prioritised above this option.
- Development of this option will have an adverse impact on the environment in terms of a loss of biodiversity (i.e. loss of badger habitats), the two protected forested areas, and increasing the risk of flooding along Nene Valley to Northampton and beyond.
- It will result in an unacceptable impact on the landscape and the historic/archaeological assets (i.e. Borough Hill, Burnt Walls).

Joint Planning Unit Response

The scale of development in the Emergent JCS is based on projected population and the designation of the area as one of the growth points in the UK. The general review of the region’s population and employment assumptions underpin the need to plan ahead.

The JCS incorporates the principle of good design as outlined in PPS1 and seeks to minimise the impact of development on local character. Sustainable development can be implemented in this location in a way that reduces the impact on the environment and minimises any harmful effect. The JCS objectives and emerging policies will ensure the suitability of the development. High design standards will be achieved and the implementation of the policies and strategies.

Additional evidence base in relation to the transport implications is being finalised, the capacity of the infrastructure are currently being completed. This will clarify all the sustainable transport measures that may need to be incorporated into the policy framework and help justify all the infrastructure improvements that may be required.

The JCS population projections and housing requirements takes into account reuse of brownfield land and reuse of vacant buildings as is required by national guidance. Greenfield development is required to provide for housing needs.

Studies have been undertaken including Sustainability Appraisal (SA) and Appropriate Assessment (AA) as part of the plan making process, which will ensure measures (i.e. Green Infrastructure, design measures, sensitive location of development) are incorporated into the policy framework to eliminate/minimise any adverse environmental impacts.

During the course of plan preparation it has become evident that the scale of development as required by the RSS cannot be delivered within the plan period to 2026 due largely to the economic down turn. Consequently, the scale of development as required by the RSS has been reduced for the JCS in line with a deliverable projection and reflecting local needs.

The plan is for a 15 year period and it is therefore unreasonable to expect the current state of the economy to continue throughout the period. The projected growth and the assumptions made are based on reasonable prospect of economic recovery but striking a balance and reducing the level of growth. It is also acknowledged that the approach and the assumptions made will be reviewed from time to time through the AMR.

The JCS should only bring forward sites that enable development to make maximum benefit to the communities in a sustainable manner. In the light of the reduced housing delivery for West Northamptonshire it is suggested that the SUEs proposed in the EJCS should be reassessed to ensure that the development that is brought forward through the next stage of the JCS is the most sustainable and deliverable option set against a reduced housing delivery.

Recommended Action

In the light of the reduced housing delivery for the JCS to 2026 the Daventry South East SUE has been reassessed and excluded from progression forward to the PSJCS.

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Question 33

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

Summary of Representations

Total	Support	Object	Gen. Comments
824	52	331	441

Summary of issues raised by objectors

- The plan is based upon an out of date population projections and cannot be supported. The RSS housing target can be met without the allocation of land at Daventry.
- Lack of employment provisions means that the option cannot be supported. Information in relation to the level of out commuting from the town should have been included.
- The proposed/current infrastructure is insufficient to support the proposed level of growth. For example, there is a lack of capacity at the Whilton Sewage Treatment Works and lack of secondary school places.
- There is a need to develop the Weedon-Flore bypass.
- New sustainable links to Long Buckby will be problematic because it will require longer travel times in comparison with alternative options and access around Drayton Reservoir is poor.
- Daventry North was condemned by an inspector at a Local Plan Inquiry. These views are still relevant.
- Development at Crick is a preferable location for growth.
- The option will adversely impact on the village of Welton (as well as contrary to the Parish Plan) and Grand Union Canal conservation area.
- Development of brownfield sites and the reuse of empty properties should be prioritised over greenfield development.
- The option will have an adverse impact on the environment, in terms of a loss of wildlife habitat and biodiversity, and increase flood risk downstream
- The topography of this option will cause it to be highly intrusive on the landscape, particularly the area between Welton and Daventry. There are concerns about the coalescence of the latter two locations and other villages.
- This performs less well in sustainability terms due to distance from the town centre and employment locations. Also it was noted that this option is weak in terms of character and accessibility.

Joint Planning Unit Response

The scale of development in the Emergent JCS is based on projected population and the designation of the area as one of the growth points in the UK. The general review of the region's population and employment assumptions underpin the need to plan ahead.

The JCS incorporates the principle of good design as outlined in PPS1 and seeks to minimise the impact of development on local character. Sustainable development can be implemented in this location in a way that reduces the impact on the

environment and minimises any harmful effect. The JCS objectives and emerging policies will ensure the suitability of the development. High design standards will be achieved and the implementation of the policies and strategies.

A Sustainability Appraisal (SA) is being completed to assess all the options against the SA framework. This will ensure that measures are incorporated into policies which aim to minimise/eliminate any adverse economic, social and environmental impacts of the options, in order to promote the sustainable development of the JCS area.

An Infrastructure Delivery Plan (IDP) is currently being completed. This will examine the capacity of the existing infrastructure, determine when and where new provisions will be required, and adequate funding is available in order to support the level of growth being proposed. Additionally, it should be emphasised that the IDP will be supported by the collection of other evidence bases such as the Water Cycle Study (WCS), transport study etc.

The inspector's comments in relation for the adoption of the Local Plan (i.e. 1997) relate to the circumstances at that time, the level of growth being considered, other development site opportunities and the provisions under which the Local Plan was being produced.

Although Crick is located within close proximity to a strategic employment site (DIRFT), the development of this location will be contrary to JCS vision that aims to focus strategic growth close to the main urban areas of Northampton, Daventry, Towcester, Brackley and Daventry.

During the course of plan preparation it has become evident that the scale of development as required by the RSS cannot be delivered within the plan period to 2026 due largely to the economic down turn. Consequently, the scale of development as required by the RSS has been reduced for the JCS in line with a deliverable projection and reflecting local needs.

The plan is for a 15 year period and it is therefore unreasonable to expect the current state of the economy to continue throughout the period. The projected growth and the assumptions made are based on reasonable prospect of economic recovery but striking a balance and reducing the level of growth. It is also acknowledged that the approach and the assumptions made will be reviewed from time to time through the AMR.

The JCS should only bring forward sites that enable development to make maximum benefit to the communities in a sustainable manner. Further assessment and a review of the representations and in the light of the reduced delivery for West Northamptonshire, and compared to other potential development sites at Daventry there is evidence that Daventry North may be less sustainable than other options.

Recommended Action

In the light of the reduced housing delivery for the JCS to 2026 the Daventry North SUE has been reassessed and excluded from progression forward to the PSJCS.

Question 34

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

Summary of Representations

Total	Support	Object	Gen. Comments
882	58	324	440

Summary of issues raised by objectors

- Too many dwellings are being proposed which are based upon out of date and inaccurate household projections.
- Housing trajectories that were produced at a recent public enquiry in to this and other sites indicated that the housing numbers stated underestimate the housing potential of the area.
- The area cannot accommodate 2000 jobs.
- There is an unbalanced jobs/dwellings ratio and the level of out commuting figures should have been included (like Northampton).
- The scale of this development will create its own shopping/community centre which will undermine the regeneration of the town.
- The economy of the town should be restructured towards knowledge industries of the future.
- This option will have an adverse impact on the Grand Union Canal, as well as the number of boaters and tourists to the area.
- The development of this option will have a negative effect on the environment because it will result in displacing various fauna and flora habitat, increase flood risk due to its location on a flood plain from Daventry and Drayton reservoirs and surface water flooding/problems in the upper Nene, loss of valuable agricultural land, as well impact the wildlife in the county park.
- Growth should be accommodated on brownfield sites rather than greenfield sites.
- This option is located further away from the centre of Daventry in comparison to the alternatives which is likely to create congestion because the transport infrastructure is inadequate for the level of growth that has been proposed. There is a need to upgrade the road network (i.e. Flore/Weedon bypass)
- The safety of cyclists on the national cycle-ways will be compromised.
- This option will have an adverse impact on traffic using country roads and the tranquil setting of the villages.
- The option is heavily reliant on Long Bucky Station.

Joint Planning Unit Response

The scale of development in the Emergent JCS is based on projected population and the designation of the area as one of the growth points in the UK. The general review of the region's population and employment assumptions underpin the need to plan ahead.

The JCS incorporates the principle of good design as outlined in PPS1 and seeks to minimise the impact of development on local character. Sustainable development can be implemented in this location in a way that reduces the impact on the environment and minimises any harmful effect. The JCS objectives and emerging policies will ensure the suitability of the development. High design standards will be achieved and the implementation of the policies and strategies.

A Sustainability Appraisal (SA) is being completed to assess all the options against the SA framework. This will ensure that measures are incorporated into policies which aim to minimise/eliminate any adverse economic, social and environmental impacts of the options, in order to promote the sustainable development of the JCS area.

An Infrastructure Delivery Plan (IDP) is currently being completed. This will examine the capacity of the existing infrastructure, determine when and where new provisions will be required, and adequate funding is available in order to support the level of growth being proposed. Additionally, it should be emphasised that the IDP will be supported by the collection of other evidence bases such as the Water Cycle Study(WCS), transport study etc.

A Retail Assessment has been commissioned to provide an evidence base to inform the retail policy approach in the JCS. The policy approach can define the scale, phasing, location and type of retail development appropriate to the scale of housing development and to which locations new retail development should be directed. The regeneration of Daventry Town Centre is an important objective of the plan.

Measures such as sensitive design, location and green infrastructure will be incorporated into the policy framework to ensure that development proposals for the area will enhance/preserve the historic built and natural environment, rather than have an adverse impact on it.

Transport modelling and studies have taken place to assess the capacity of the infrastructure and how new development proposed in the Emergent JCS may impact on the highway network and the mitigation required. Detailed studies are continuing. Any highway requirements identified will be referred within the policy content of SUEs and within the transport section of the next stage of the JCS. In addition the EJCS has strong emphasis on the need to reduce congestion and promote more sustainable modes of transport. This will continue to be reflected in the Pre Submission JCS.

During the course of plan preparation it has become evident that the scale of development as required by the RSS cannot be delivered within the plan period to 2026 due largely to the economic down turn. Consequently the scale of development as required by the RSS has been reduced for the JCS in line with a deliverable projection and reflecting local needs.

The plan is for a 15 year period and it is therefore unreasonable to expect the current state of the economy to continue throughout the period. The projected growth and the assumptions made are based on reasonable prospect of economic recovery but striking a balance and reducing the level of growth. It is also acknowledged that the

approach and the assumptions made will be reviewed from time to time through the AMR.

The JCS should only bring forward sites that enable development to make maximum benefit to the communities in a sustainable manner. In the light of the reduced housing delivery for West Northamptonshire it is suggested that the SUEs proposed in the EJCS should be reassessed to ensure that the development that is brought forward through the next stage of the JCS is the most sustainable and deliverable option set against a reduced housing delivery.

Recommended Action

In the light of the reduced housing delivery for the JCS to 2026 the Daventry North East SUE will be reassessed for progression forward to the Pre-Submission version as set out in Policy D3 of the PSJCS.

Question 35 - Do you support the development of the Preferred Option 'Towcester South'?

Summary of Representations

Total	Support	Object	Gen. Comments
439	75	321	432

Summary of issues raised by objectors

- Brownfield sites/ disused properties must be developed prior to greenfield sites;
- Infrastructure proposals are too lightweight to support this level of growth;
- Concern regarding flood risk;
- Site is not sustainable and is more than 5km from a train station;
- This option will destroy the character of Towcester;

Representation from the Wood Burcote Residents Association is summarised below:

- Concern regarding the scale and form of the extension;
- Submitted planning application should be postponed as it pre-empts the EJCS;
- Road proposals do not meet the requirements to improve Towcester. A 40mph limit, single carriage way and multiple roundabouts will not encourage use of road. Will increase accident rate and not divert traffic from Towcester Centre;
- Proposed highway will not accommodate growth of Towcester, current traffic and increased traffic due to growth at neighbouring locations. It is not sufficient to be a trunk road and the Highways Agency will be reluctant to de-trunk A5 through Towcester centre;
- The bypass will increase noise and pollution and increase congestion onto A43, which is unacceptable for current and future residents at Wood Burcote;
- No policy/requirement for developers to provide appropriate future pledge to job creation in Towcester prior to the development of houses commencing;
- Wood Burcote lane should be restricted to residents only and use should not be permitted for development/construction traffic;
- Construction operation time restrictions should be applied;
- A green buffer of no less than 30m should be imposed around Wood Burcote;
- The local bat population should be preserved;
- The extension appears to be led by developers rather than planners;
- Loss and severance of public rights way;
- No extra street lighting in Wood Burcote and no floodlights on sports pitches
- The playing field clubhouse should be located away from housing;
- Will envelop Wood Burcote resulting in the loss of village character. This is contrary to the law requiring the protection of distinct villages;
- Insufficient detail about "essential strategic improvements to the A43 junction". Essential implies the absolute minimum;
- Development must not be on agricultural land;
- Extension is excessive, unjustified and unsustainable. Growth not considered consistent with RSS guidance relating to development at Rural Service Centres. Explanation as to why the growth is appropriate or deliverable is inadequate;

- Growth should be at Brackley where the employment base is located;
- Scale of growth at Brackley and Towcester exceeds residual housing trajectory for South Northamptonshire. Would mean there is no scope to allow development in rural areas and is contrary to Council's Interim Housing Policy;
- Support for Towcester South, but not in its current form. Support for development near Shacks Barn. This will allow for the existing bridge to be used for a by-pass and would be a suitable option for employment development. Not prudent to rely on knowledge base industry – this option plans for industrial uses that are still required.

General Comments

- The feasibility of creating a green infrastructure route to Banbury, Towcester and Milton Keynes is questioned;
- Regeneration of Towcester requires radical improvement in public transport e.g. transport from villages into Northampton in the evening which is currently poor;
- Maps relating to Towcester South and rejected options for Towcester are insufficiently clear and do not show all core development options e.g. is the Towcester South area consistent with Towcester Vale development proposal?
- The highway improvements will produce longer travel times from A43/A5. As a result motorists will use existing routes through Towcester as it would be easier to access, therefore the highways improvements will not alleviate congestion;
- More detail required on proposals for the Town Centre and the Moat Lane area;
- Greater emphasis must be placed on design quality in the urban extensions, particularly for Towcester Vale;
- Government funding should be used for bypass not developer contributions. The A5 is increasingly used for diverted traffic on M1. This would allow developer funds to be better utilised elsewhere;
- Concern that the Tove Roundabout (A5/A43) will not have capacity to accommodate additional traffic;
- Development must not create out-of-town retail parks that will detract from Towcester town centre;
- School facilities must be improved prior to development to encourage families to move to the area and provide for the first new residents;
- Towcester strategy does not adequately recognise the role of the University in providing training and skills to meet the aspirations of knowledge based industry and the links with Silverstone to provide state-of-the art educational campus;
- Consideration should be given to a park and ride at the A45/A5 junction;
- Concern expressed regarding the impact of growth at Towcester on traffic flows along the A5 and the capacity of the A5/A508/A422/Old Stratford interchange. This junction will need to be improved and grade separated;
- Development must be undertaken in conjunction with Towcester Masterplan.

Joint Planning Unit Response

Policy S1 of the PSJCS specifies that development of brownfield land will be the priority. Some greenfield development is however unavoidable as all of the brownfield land cannot accommodate the proposed development.

It has not been specified as to why the infrastructure proposals are “lightweight”. More information has been provided in the PSJCS on what infrastructure is to be provided at the Towcester South SUE. Policy T3 outlines that two new primary schools and a secondary school will be provided. It is also stated what roads will be improved and that of safe routes for walkers and pedestrians will be created. A new town park will also be provided, as well as structural greenspace and wildlife corridors.

Flood risk is addressed through Policy T3 which outlines that the Towcester South SUE will provide “*Surface water management and flood attenuation schemes*” and “*Flood mitigation from all sources*”.

Towcester itself is more than 5km from a railway station but an ‘Integrated Transport Network with Sustainable Transport Modes’ is proposed as part of the SUE. In addition to the Transport Strategy supports ‘*improvements to the connectivity of Towcester with the wider A43 network including enhanced public transport connections with Silverstone*’.

It has not been detailed what the concerns are, regarding the scale and form of the SUE. Towcester South has been determined to be the most sustainable and suitable location for development. In regards to the scale of development, the level of housing growth to be delivered in the plan period has been reduced to reflect what is deliverable and also accords with the needs of South Northamptonshire’s existing population.

Improvements are to take place at the A43 junction to help alleviate traffic congestion in and around Towcester. No decision has yet been made on the speed limit of the bypass, how many roundabouts it will have or whether it will be a single lane or dual carriageway. No evidence has been provided to demonstrate that the proposed highway cannot accommodate the growth proposed at Towcester. As the speed limit, route and layout of the bypass has yet to be confirmed, it cannot be determined what impact the bypass will have on local residents. These are detailed design issues that cannot be specified in the Core Strategy. Essential strategic junction improvements are also planned along the A43 to help improve traffic flows along this road.

The Towcester South SUE will create an additional 3,000 jobs over the plan period. Of these 3,000 jobs, there is a commitment to create 1,500 jobs before the end of the plan period (2026).

Whether a road should be accessed by local residents only and whether it will be used by construction traffic is a development management matter and not the responsibility of the Joint Core Strategy, but will be considered as part of the planning application process.

The SUE will respect the landscape setting and nearby conservation areas and will also safeguard and enhance Towcester's Green Infrastructure Network. The local bat population will be protected as the development will provide structural green space and wildlife corridors, as well as respecting the landscape setting and nearby conservation areas. Specific reference has been included in the PSJCS of the need to protect the setting of Wood Burcote.

The SUE locations have been determined based on a sound and robust evidence base and through the previous consultation periods. Including SUEs that were not being promoted by developers or in which developers had no interest would not be sound as it is important for the Core Strategy to demonstrate that sites are deliverable.

The development will provide safe routes for pedestrians and cyclists and provide new access to Towcester Town Centre. The impact on public rights of way will be fully considered as part of the planning application process, but the footpaths will either be retained, diverted or new routes provided.

The sport pitches will need floodlights during the winter months to be able to operate. It is however likely that these sport pitches will be located away from residential areas. The location of the playing field club house is a matter that will be considered at the planning application stage, it is not an issue that the Joint Core Strategy needs to address.

Although Towcester is in a predominantly rural area, Towcester itself is classed as an 'other settlement' in Policy 3 of the RSS. Therefore the SUE will need to abide by the criteria set out in this Policy. For example, development in other settlements should contribute to "*shortening journeys and facilitating access to jobs and services*". The Towcester South SUE will provide an integrated transport network with strong transport links", which will help reduce the journey times to the Town Centre. It is felt that the SUE meets the objectives set out in this policy.

It would be more unsustainable to locate more growth around Brackley. A number of urban extensions have already been ruled out at Brackley (Brackley North West, Brackley South). To locate all of the growth in South Northamptonshire in Brackley would be unsustainable as more car journeys would be made to Brackley which would lead to increased congestion on surrounding roads. In addition, the Towcester South SUE proposed to create 3,000 jobs. Therefore some employment growth will be taking place in Towcester, therefore there will need to be residential development at Towcester south to support this employment growth.

The residual requirement for housing is clearly specified in the PSJCS and the scale of growth in the SUEs reflects this requirement. The residual requirement for South Northamptonshire is 6,013. The proposed SUE's propose a total of 4,930 dwellings, which again does not exceed the residual requirement.

Shacks Barn falls within the East of Silverstone Lung extension. This option was rejected on the grounds that it would not support the regeneration of Towcester and by virtue of its location, this option would not necessarily enable and support the delivery if co-ordinated transport improvements with an emphasis on non-car modes.

Response to General Comments

Green Infrastructure is *“an asset that enables the environment to support and maintain ecological processes whilst sustaining land, air and water resources and is important within, and beyond urban areas”*.

As part of the development proposal at the Towcester South SUE an integrated transport network with Sustainable Transport Modes, including access to Towcester Town Centre is proposed. Essential Strategic improvements to the A43 Junctions and the Construction of the A5 bypass will also form part of the Towcester South SUE development.

As the options were only the council's rejected choices, to go into great detail would be an unnecessary use of the JPU's resources. The Towcester Vale development proposal is consistent with Towcester South. More detailed plans will be provided in the PSJCS as part of the key diagram and proposals map.

No evidence has been provided to support the claim that highway improvements will produce longer travel times from the A43/A5. The construction of the A5 bypass and the improvements to the A43 junctions will help reduce journey times. In addition, the Towcester South SUE will be expected to provide sustainable access to the town centre. These factors will help reduce journey times from the A43/A5 and will help to alleviate congestion in the area.

Paragraphs 4.45 and 4.46 of the PSJCS discuss the design within West Northamptonshire and how the *“valued historic character must be protected without stifling new and innovative design”*. Objective 4 also deals with High Quality Design and states that it is the PSJCS objective to *“achieve high quality design in both rural and urban areas that takes account of local character and heritage and provides a safe, healthy and attractive place for residents, visitors and businesses”*. Therefore great emphasis has been placed in the Joint Core Strategy on the issue of high quality design.

Given the current recession and Government spending cuts obtaining government funds for various infrastructure development programs has become more difficult. Developer contributions can be more easily sought and negotiated through Section 106 agreements and potentially the Community Infrastructure Levy (CIL) in future. The development at Towcester South will provide “essential strategic improvements to the A43 Junctions”. This will include the Tove Roundabout. In addition, the Towcester South SUE development will include the construction of an A5 bypass. The development only proposes small scale retail development (up to 500sqm net) and does not propose large scale out-of-centre retail parks. Out of centre development is also the least sequentially preferable.

The development at Towcester South will provide two new primary schools and a secondary school. The Infrastructure Development Plan (IDP) will set out when these schools are to be built. A new education campus will be provided at Silverstone Circuit. Policy E4 outlines that *“To support Silverstone Circuit as an International Venue for Motorsport further employment, tourism, education and leisure development at Silverstone Circuit will make provision for: 14Ha Education*

Campus". The Policy also outlines that *"All Proposals will need to demonstrate functional links to Towcester and Brackley in particular by strengthening sustainable transport links between the circuit and the towns"*. Therefore links will be provided between Silverstone Circuit and Towcester to encourage Towcester Residents to consider employment at Silverstone Circuit.

It has not been outlined as to why a park and ride scheme should be considered at the A45/A5 junction. The Transport Strategy for Towcester specifies that public transport connections will be enhanced with Silverstone, as well as a review of parking provision across the town. The Towcester South SUE also proposes the construction of an A5 bypass, essential strategic improvements to the A43 junctions and an integrated transport network with sustainable transport modes, including access to Towcester Town Centre.

The Towcester South SUE does propose the construction of an A5 bypass which will help reduce traffic flows along the A5. In addition, the Towcester South SUE proposes essential strategic improvements to the A43, as well as an integrated transport network. This will also help reduce traffic flows along the A5. The development will be prepared in conjunction with the Towcester Masterplan. The Towcester Masterplan is discussed in detail in the PSJCS, with the key objectives of the Masterplan highlighted in the PSJCS. It is felt that the key objectives discussed in the Towcester Masterplan are in conformity with the policies highlighted in the Towcester chapter of the PSJCS.

Recommended Action

That the preferred Option 'Towcester South' be retained as specified in Policy T3 of the PSJCS.

Question 36 - Do you support the development of the Preferred Option 'Towcester Moat Lane'?

Summary of Representations

Total	Support	Object	Gen. Comments
819	360	29	430

Summary of issues raised by objectors

- This option would destroy a green area of heritage value;
- This option is unsustainable;
- Insufficient information has been provided to form an opinion on this site; and
- The strategy for Towcester fails to translate the importance of the University as a major contributor to economic growth.

General Comments

- This is a small area that could easily be developed privately;
- The A5 Bypass is fundamental to this and other growth options in Towcester;
- Attention needs to be given to integrating the old and new communities created by the scheme;
- There should be a bus interchange near Bury Mount
- Should be done in conjunction with the Towcester Masterplan.

Joint Planning Unit Response

Policy T2 details that the proposed Town Centre and Moat Lane Regeneration area will provide *"The preservation and enhancement of Bury Mount, which is a scheduled ancient monument"*. Therefore the green area of heritage value will not be destroyed, as the majority of brownfield land will be used as part of the development proposals.

More information has been provided in the PSJCS on the proposed types of development at the Towcester Town Centre and Moat Lane regeneration area. The Joint Planning Unit is not aware of any specific proposals by the University relating to Towcester. If proposals did emerge then there is nothing in the strategy that would prevent their consideration indeed Policy E6 of the PSJCS would encourage this.

Policy T4 outlines that *"To support accessibility and sustainable transport within Towcester the Local Authorities will: Secure the construction of an A5 bypass to the south of Towcester and the management of through traffic to the Town Centre"*. Therefore the construction of the A5 bypass is of high priority as it is required to support the redevelopment of the growth options in Towcester, which the PSJCS seeks. In terms of a bus interchange, it is not specified why a bus interchange is required. There will be enhancements to the inter-urban bus services along the A5 and A43 corridors.

Policy T2 outlines that new residential, employment, retail and food and drink premises will need to enhance the vitality of the town centre. Careful consideration will therefore be given to proposed schemes to ensure that it will be integrated with the existing town centre.

The Towcester Masterplan is discussed in the PSJCS. The key objectives highlighted in the Masterplan are also discussed and are broadly followed in the

development proposals at the Towcester Town Centre and Moat Lane Regeneration area.

Policy T2 of the PSJCS details the regeneration of Moat Lane Regeneration area, including new Civic and Community facilities, including the preservation and enhancement of Bury Mount, which is a scheduled ancient monument. The Towcester Transport Strategy outlines that the A5 bypass is a crucial element to the regeneration of Towcester, which will be required to support the town's regeneration.

Recommended Action

That the preferred option 'Towcester Moat Lane' is retained as set out in Policy T2 of the PSJCS.

Question 37 - Do you support the development of the Preferred Option 'Brackley North'?

Summary of Representations

Total	Support	Object	Gen. Comments
824	55	325	444

Summary of issues raised by objectors

- Development to the north will accentuate the imbalance of housing to the north of Brackley and will increase the distance required to travel to the town centre;
- The growth projections on which the Plan is founded are out dated. The extension cannot be supported;
- There is no 'network into the town centre'. The road network and parking provision in town centre is insufficient to cope;
- This is not a brownfield site and cannot be supported. Development of brownfield sites must be prioritised above greenfield sites;
- Rural lanes (Halse / Radstone Rd) will not be able to support level of growth;
- No contingency options are specified for development if the current extensions at Brackley are not delivered within the Plan period;
- Option B, which has not been fully appraised predetermines the selection of Brackley sites. Reappraisal of the preferred choices and rejected sites should be considered e.g. the site to North West of Brackley;
- Development at Silverstone would be preferable with direct links to circuit that generates employment and therefore housing;
- Brackley East will provide for local need. Other extensions i.e. Northampton 5 (South) could accommodate growth;
- Archaeological resources must be protected;
- No implementation/action plan is provided to support proposals;

General Comments

- Will need to address the problem of low water pressure;
- Lack of secondary school provision is a concern and will need to be considered;
- Extension must ensure cohesion of the entire town;
- Sewage problems exist at Burwell Hill Garage / Jarvis Court;
- Brackley North within close proximity to the Helmdon disused railway SSSI, which should be enhanced through development of this site. Wildlife Trust should be involved in this respect. Pre-submission draft should require ecological enhancement and green infrastructure contribution as an integral part of each urban extension;
- Core Strategy must align with the draft Brackley Masterplan once completed;
- The inclusion of opportunity sites in town centre would be welcomed;
- Concern that the 'minor improvements to A43/A422' underplays the need for investment around the A43 at the Sawmills site;
- Development should follow a sequential approach to development which be ordered thus; Sawmills site, Turweston Road, Extension to Magdalen College, Brackley Pool Site, Brackley Leisure Centre Site.

Joint Planning Unit Response

The Brackley North West and Brackley South West options have been rejected in the EJCS as they are the least sustainable options of the four proposed.

As part of the Brackley North SUE, it is expected that it will provide “*an integrated transport network with Sustainable Transport modes*”, as well as “*Direct road access to Northampton Road*”. This will contribute towards easy access to the Town Centre.

In regards to an imbalance of housing, it has been determined that Brackley North is the most sustainable location for housing growth. Development at Brackley South has been rejected as part of the site is within the River Ouse Flood Zone, would have adverse landscape impacts and has poor connectivity to Brackley Town Centre.

The growth projections used for the PSJCS are not out of date. The most recent figures have taken into account the recent recession and are based on what is deliverable and meets the needs of the local population. The scale of growth at Brackley including the Brackley North SUE reflects these up to date projections.

Both SUE's in Brackley will be expected to provide integrated transport networks with access both to the town centre and to Brackley Business District. The Brackley Transport Strategy will also ensure that parking provision meets the needs of the town and support improvements to the connectivity of Brackley to the wider A43 network, including enhanced public transport connections with Silverstone Circuit.

The prioritisation of brownfield sites over greenfield is outlined in Policy S1. Not all of the development can be accommodated on existing brownfield sites. Therefore some greenfield development will need to take place. The fact that the proposed SUE is not a brownfield site is not a justification for not supporting the scheme.

A new access road will be provided at the SUE that will have direct access to Northampton Road. The majority of residents will use this road when accessing the SUE and the town centre, which will reduce the pressure on Halse and Radstone Roads.

There is no reason why the Brackley North SUE cannot be delivered in the plan-period. The JCS will be subject to continuous monitoring through the Annual Monitoring Report (AMR) and could be reviewed if there is evidence that sites are not coming forward.

Brackley North West has been rejected as it would lead to an increase in traffic and not be in line with the JCS sustainable transport principles. Option B has been fully appraised and does not predetermine the selection of Brackley Sites. Each site has been assessed in detail through consultation processes and Sustainability Appraisal (SA) which have determined that Brackley North and Brackley East SUE's offer the most sustainable options.

Silverstone is a smaller settlement than Brackley. To build the required scale of development at Silverstone rather than at Brackley would require a notably higher level of infrastructure investment, which in turn would be far less sustainable. As part of the Brackley Transport Strategy, local authorities will “*Support Improvements to*

connectivity of Brackley to the wider A43 Network including enhanced public transport connections with Silverstone Circuit". Therefore Brackley will have enhanced links to the employment opportunities that Silverstone Circuit provides.

No evidence has been provided for the Brackley East SUE alone to accommodate the level of growth proposed. South Northamptonshire has a housing requirement of over 12,000 dwellings over the plan period. As one of the two main towns in South Northamptonshire, Brackley will be one of the main locations to accommodate this growth. Northampton South has been rejected as an extension as it would severely impact upon the character of Northampton as well as in effect forming a new town which would require a greater amount of infrastructure investment.

Archaeological resources will be protected through Policy BN5. New development will *"Protect and enhance the features which contribute to the distinctive character of the area including sites of known or potential historical significance"*.

Policy S6 details the likely phasing of the development at each of the proposed SUE's. In addition, the IDP will specify when the proposed infrastructure development will take place at each site.

The new development will deliver the appropriate water pressure.

The future plans for secondary school provision in Brackley have not been finalised and there are a number of options including the possibility of consolidating the existing school onto one site. The Core Strategy will ensure that the new development makes the necessary contributions to support required improvements to secondary school provision once these are agreed.

An integrated transport network is proposed as part of this development proposal, with sustainable transport modes including access to Brackley Business District, as well as direct access to Northampton Road.

Burwell Hill Garage/Jarvis Court are not on the SUE site and it is therefore not the responsibility of the SUE to address the sewage problems at these roads. However, adequate sewage facilities will be provided on the SUE site.

The former railway corridor has been referred to in the pretext of the Brackley North SUE policy. It outlines that the *"design and layout of the development will need to maintain the integrity of the SSSI"*. It is expected that the design and layout will *"respect the character of the Old Glebe Landscape Character area, the enhancement of local green infrastructure networks and provide structural greenspace and wildlife corridors"*.

The Brackley Masterplan is discussed in the PSJCS. The objectives have been taken into account when developing the SUE's. For example, one objective in the Masterplan is a proposal for a *"Strengthened 'Brackley Business District' that combines the Town Centre and adjoining industrial estate"*. Part of the development that the Brackley North SUE will deliver is *"An Integrated Transport Network with Sustainable Transport Modes including access to Brackley Business District"*. Therefore the Core Strategy will align with the Brackley Masterplan once adopted.

It is the responsibility of the Site Specific Allocations document to determine opportunity sites in the town centre. However, the Brackley Spatial Strategy supports the housing development within the existing urban area.

It has not been outlined as to why this sequential approach should be followed. The sustainability of the SUE's have been assessed in detail and the SUE's contained within the SUE have been judged to be the most sustainable. In addition, the role of education facilities is recognised through Policy E6 of the PSJCS. It outlines that the *"role of the University of Northampton, Moulton College, Northampton College and other Educational Institutions will be supported"*.

Recommended Action

That the preferred option 'Brackley North' be retained as set out in Policy B3 of the PSJCS.

Question 38 – Do you support the development of the Preferred Option ‘Brackley East’?

Summary of Representations

Total	Support	Object	Gen. Comments
823	357	26	440

Summary of issues raised by objectors

- Opposes the use of this area solely for employment use;
- Area contains wildlife that would be endangered by development. In particular, the railway embankment is the last known site for the small blue butterfly;
- This is not a brownfield site;
- Major improvements will be needed to the High Street, Northampton Road, A43 and A422 to support the increase in commercial traffic;
- Growth should only occur at the rate of natural population growth;
- Limiting the SUE to purely employment undermines ability of the plan to respond to the changing needs of the community. As such, this area should be designated for mixed use;
- Separation of employment and housing may lead to these areas being unoccupied at night and day. Would lead to an increase in fear of crime;
- Development at Silverstone is more appropriate as it directly links to the race circuit, which is a major generator of employment and therefore housing;
- Development should be spread evenly across West Northamptonshire, rather than in the urban extensions specified; and
- Industrial requirement could be met on Sawmills site rather than using greenfield land.

General Comments

- Brackley needs a bypass before development can proceed;
- This section should set out a sequential approach to site development;
- Are the jobs proposed short term construction ones or long term employment?
- A means must be established to discourage retail enterprises from establishing in industrial zones to avoid high rental costs;
- Substantial structural landscaping should be an essential part of this option
- Area could include a large clothing/household retail store, which might keep shoppers within the town. This would help regenerate smaller town shops; and
- A lorry park should be provided and lorries restricted from using the High Street.

Joint Planning Unit Response

The site is not being developed solely for employment use, as suggested in the EJCS. Policy B2 outlines that the Brackley East SUE will also include 380 dwellings, as well as various transport and landscape improvements around the SUE. An ecological assessment of the site will be conducted prior to any development occurring on site. Where any habitats are identified, the required mitigation measures will be in place before any development occurs on site.

The level of growth proposed cannot be accommodated on all the brownfield land in West Northamptonshire. Some greenfield development will need to occur. However,

Policy S1 outlines that *“Priority will be given to the reuse of suitable previously developed land and buildings within the urban areas”*.

Each SUE will provide an integrated transport network with sustainable transport modes. The Brackley East SUE also incorporates the realignment of and traffic calming to Turweston Road. The Brackley Transport Strategy will also ensure parking provision meets the needs of the town.

The population growth figures are based on net-nil migration growth and as such the level of growth now proposed in the PSJCS is consistent with the natural growth of the existing population.

This development is no longer being solely developed for employment purposes, 380 dwellings are now proposed at the Brackley East SUE, therefore the SUE is now a mixed use scheme. This would ensure that the site is occupied throughout the day thus reducing the fear of crime.

Silverstone is a much smaller settlement than Brackley. To locate more growth at Silverstone would be unsustainable as a greater level of infrastructure would need to be constructed to sustain the level of growth proposed. The Brackley Transport Strategy outlines that the local authorities will *“Support improvements to connectivity of Brackley to the wider A43 network including enhanced public transport connection with Silverstone Circuit”*. Therefore the SUE's will be well connected to the major employment centre of Silverstone Circuit.

The spreading of development is option A that was discussed earlier in the EJCS. The reasons why this option was rejected are specified in chapter six of the EJCS. An application has been submitted on the Sawmills site for residential development and has been approved subject to S106 agreement being signed. The site does not fall within the Brackley East SUE allocation, but is now included as part of the Brackley North SUE.

No evidence has been provided as to why Brackley needs a bypass. Policy B4 outlines a number of schemes that will help reduce the amount of traffic on the roads around Brackley and negate the building of a bypass in the town.

It has not been specified as to why a sequential approach to site development is required. The preferable SUE's have been assessed through previous consultation periods and through Sustainability Appraisal.

Policy E1 outlines that *“Change of use to other uses will be resisted unless it can be demonstrated that the site is no longer economically viable for employment purposes, there is a clear conflict with adjoining uses, or its release would offer significant benefits to the local area”*. This will help discourage retail enterprises from building on existing industrial areas.

The PSJCS outlines that the proposed Brackley East SUE will contain *“Landscape Buffer / noise mitigation to the A43, High Quality Design and Layout which respects the character of the Great Ouse Landscape Character Area and the Enhancement of*

Local Green Infrastructure Networks". These key elements of the Brackley East SUE will ensure substantial structural landscaping is delivered.

The inclusion of comparison retail development on a site outside the town centre would be inconsistent with national and Core Strategy policies and could undermine the viability of the town centre.

The issue regarding lorries is a detailed matter which can be considered through the Brackley Masterplan rather than the Core Strategy.

Recommended Action

That the preferred option 'Brackley East' be retained as set out in Policy B2 of the PSJCS.

Question 39 – Do you support the policy approach for the hierarchy of centres?

Summary of Representations

Total	Support	Object	Gen. Comments
847	107	343	397

Summary of issues raised by objectors

- Social and retail centres should be provided from the outset and new communities developed around them. The respondent is not convinced that the satellite retail areas are damaging town centres and unless there is substantial and imaginative development of the town centres, the existing retail parks may have to be developed further or even added to;
- The notion of Northampton as a desirable centre is pure fantasy. Traffic improvements cannot be made without demolishing parts of the old town and basing the alternatives upon modal shift is a foolish plan that cannot be substantiated by any expert in the country;
- Out of town retail succeeds by virtue of the extensive provision of car parking and that town centre locations cannot always provide this. This is a contrast with town centre retail development and improved public transport will not provide the same level of convenience;
- This section is too vague and more information is needed;
- It is questionable whether Daventry Town Centre is a principal centre for retail, employment and housing development given there are a number of housing and employment areas outside Daventry's centre;
- Policy approach is self-contradictory as on one hand it deters out of town retail and on the other it states that retail is a key aspect of Northampton South East;
- How will this be funded?
- Northampton could become a major retail attraction if out of town shopping centre were built around a junction of the M1 motorway;
- District centres are an excuse for suburbia. One supermarket will not satisfy consumer demand and is monopolistic. What is needed is good, environmentally sound public transportation to a good town centre;
- The proposed policy approach effectively places a moratorium on edge of centre retail development. This is contrary to *PPS 6: Town Centres and PPS 4: Economic Growth*, which allows such development where it meets certain tests (e.g. retail need, the sequential approach and development impact);
- Daventry was chosen as a sub-regional centre in RSS8. However, it is severely limited by its infrastructure and pales in comparison to the competition from other towns like Milton Keynes. Therefore contingency planning is needed;
- Sixfields is an important shopping & leisure centre but is totally ignored by the JCS. Designating it a District Centre would allow it to secure more sustainable patterns of travel in meeting local shopping needs and would provide the Council with the greatest scope to influence and control future development;
- Proposed hierarchy ignores smaller centres such as Link Road and St Davids. The hierarchy does not allow for the development of Neighbourhood Centres in areas such as East and West Hunsbury and Grange Park;
- No reference is made to the fact that new development may necessitate a need for new retail centres. Policy "*Milton Keynes South Midlands South*

Midlands Sub Regional Strategy Northamptonshire 2 within the East Midlands Plan indicates that these new centres may be needed;

- Brackley needs further retail and employment facilities, contrary to the conclusions reached in Appendix E and the West Northamptonshire Retail Study. Given the paucity of land in the town centre however, this can only be provided in an out of town centre location;
- The CACI [Retail] Study used to support this policy approach is flawed. Specifically, it is predicated on the assumption that all out-of-centre retail-offer is bad and ignores other important factors, such as competition from centres like Milton Keynes;
- Resisting new retail development across Northampton until post 2016 will have a negative effect on the ability of the town centre to claw back trade from other centres, such as Milton Keynes;
- There is an overreliance in the hierarchy on the Grosvenor Centre extension providing the bulk of retail provision. In particular, it is unlikely the Grosvenor Centre will be opened by 2016. This is also the date indicated in the Northampton Central Area Action Plan (NCAAP), which is therefore inconsistent with the Core Strategy;
- This approach ignores rural areas;
- Mereway District Centre should be retained as a District Centre as it is consistent with the definition in *PPS6: Town Centres*. Significant investment has been made in the centre and it may decline if not designated;
- Facilities need to be decentralised ready for coming decline in personal travel;
- The terminology used in Tables 6.5 and 6.6 is inconsistent with that used in PPS6. In particular, the definitions used appear more closely related to the urban fabric, rather than their retail role. As such, all centres listed in Table 6.6 should be redefined as local centres;
- A stronger policy framework is needed for the delivery of a new centre to serve Northampton West given the existing evidence base. Otherwise, the framework may be found unsound; and
- More recognition needs to be given to the ability of local centres to meet local need and their ability to support a rural renaissance.

General Comments

- Daventry should have clear retail role to highlight its sub-regional centre status;
- Do these designations take into account what may happen as a result of future development?
- Further work is required in relation to Northampton. This would include the location of the High Street and neighbourhood locations which are unclear. The hierarchy should assist with sustainable transport movements through enabling people to meet their local shopping and service needs within close proximity of their homes. The EJCS should set out what uses would be acceptable at a local, district and city centre scale;
- A major reason why Northampton Town Centre is not competitive with out of town retail is convenience. Shoppers can park free, relatively close to where they buy goods and have the free use of trolleys at out of town retail centres. This contrasts with the situation in town centres;
- Hierarchy of centres set out in Table 6.5 should include a ranking column and ranking of each centre so readers are in no doubt of the purpose of the table;

- Retail centres tend to form their own size and ranking depending mainly on the number and habit of their customers. As such, a policy on hierarchy should not be too rigid;
- Should other areas (e.g. Abington, St Catherine's Hospice) be considered?
- Town centres in rural areas must have adequate long and short term parking facilities given the relative paucity of public transport;
- Northampton centre needs a redesign. The bus station should be demolished and more housing built, rather than more shopping for the Grosvenor Centre;
- Traffic congestion and the absence of free parking need to be addressed to make Northampton a desirable shopping area.

Joint Planning Unit Response

The need to reverse the presumption in favour of out of town centre is underpinned by the need to promote sustainable development and government advice in PPS4. Evidence from the retail study demonstrates that out-of-centre retail is damaging town centres. The JCS has identified the town centres for a large amount of new retail floorspace and this will help regenerate the areas by bringing new investment into the town centre. This does not equate to a moratorium as existing local centres will continue to serve the community and new retail centres are proposed at some of the SUE's.

Northampton is the main town in West Northamptonshire and it is appropriate for the Core Strategy to seek further retail provision to serve the community. The majority of new retail development in Northampton over the plan period will occur in the town centre. Policy N2 outlines the amount of comparison and convenience floorspace that will be developed in the town centre. Policy N10 also states that "*No further comparison goods floorspace is required outside Northampton Central Area other than to support the vitality and viability of local centres*". Therefore no further out-of-centre comparison will be allowed.

Improved public transport provision will be made through the transport strategy for Northampton (Policy N12), which outlines that the transport strategy shall provide "*Improved Connectivity to the town centre from all parts of the town by public transport, walking and cycling*". This will help improve the connectivity of the town centre to the outer suburbs and encourage more people to visit the town centre.

The JCS and background information on the hierarchy of centres and the sequential approach to site selection for town centre uses will be in the public domain. The hierarchy has been assessed against the criteria in PPS4. Daventry town centre is the primary location for retail development within the town; therefore it is a principal centre for retail.

The Northampton South East SUE is no longer proposed as part of the PSJCS. The smaller SUEs that are now proposed at Northampton South and South of Brackmills (Policies N5 and N6) do not include a district centre, but include local centres where retail floorspace will not exceed 500sqm net in size. The IDP will set out the costs of providing the non commercial facilities within local centres and seek to identify potential funding sources.

It is not the intention of the JCS to discourage people from using existing facilities. The aim is to provide good quality facilities in the most accessible location and there is no proposal to build an out of centre retail shopping centre next to the M1

motorway. The choice of retail destination is a matter for the individual. However the JCS seeks to make the main centres attractive in order to encourage their usage by as many people as possible.

PPS4 outlines that District centres *“usually comprise groups of shops often containing at least one supermarket or superstore and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library”*. The two district centres within Northampton (Weston Favell and Kingsthorpe) provide these facilities and are not part of “suburbia”.

As the retail capacity for West Northamptonshire in the plan period is 23,102sqm net over the plan period, it is recognised that one supermarket will not meet this demand. New small scale supermarkets are proposed within some of the Local Centres over the plan period which will help meet consumer demand, as well as potential extensions to existing stores that maybe overtrading.

The role of Daventry town centre has been acknowledged in the Core Strategy. It is classed as a Sub-Regional Centre in Policy S2 (Hierarchy of Centres) and identified as an area for further growth. Major retail, office and leisure development will also take place within the area. In addition, the Daventry North and Daventry East SUE will provide integrated transport networks which will provide strong links to the town centre. This will help enhance the role that Daventry Town Centre plays in West Northamptonshire.

The role and function of existing centres is recognised by the JCS. Policies in the Plan seek to protect existing facilities while promoting the development of new ones.

The hierarchy contained within the PSJCS is for the whole of West Northamptonshire. It therefore only focuses on those centres which are of a large enough scale. In regards to focusing on smaller centres such as Link Road and St Davids for example, this will be the responsibility of various Development Plan Documents, such as the Site Allocations DPD. Paragraph 5.14 states that *“Within the West Northamptonshire area there is already a clear hierarchy of centres at the upper tiers with Northampton Town Centre as the largest, followed by Daventry Town Centre, and then Towcester and Brackley as smaller town centres”*.

Any proposal for further development of out of new out of centre retail does not accord with PPS4 and there is no evidence to support further retail and employment facilities above what is currently being proposed in the PSJCS.

Proposed development at the Grovesnor Centre is central to the provision of new retail within Northampton town centre. This will make the best use of existing facilities rather than seeking to build an entirely new centre. The detailed planning and development of Grosvenor Centre are best dealt with in the NCAAP and at planning application stage.

The Northampton Transport Strategy will deliver *“Improved Connectivity to the Town Centre from all parts of the Town by Public Transport, Walking and Cycling”*, as well as *“Improved connectivity between existing areas of Northampton to essential services and facilities such as retail, education and healthcare”*. This will help improve the connectivity to existing facilities and remove the requirement for the coming reduction in travel.

The PSJCS recognises the role of local centres and shops in rural areas and seeks to protect these.

PPS6 has been superseded by PPS4. PPS4 discusses in detail the role of district and local centres and what facilities they provide. The table contained within Policy S2 now refers to the criteria specified in PPS4 and is consistent with this document.

Daventry is the only Sub-Regional Town Centre within the Sub-Regional hierarchy. No evidence has been provided as to why Daventry should have a distinct role to recognise its Sub-Regional Centre status. Policy D2 states that *"The town centre boundary and Primary Shopping area for Daventry will be identified on the Daventry Town DPD Proposals Map. Major retail, office and leisure development will also take place within and adjoining the town centre"*. This will help encourage the growth of Daventry Town Centre as a distinct sub-regional centre.

Policy N2 outlines that *"The Northampton Town Centre Boundary and Primary Shopping Area will be identified on the Northampton Central Area Action Plan Proposals Map"*. Policy N12 outlines that as part of Northampton's Transport Network Improvements, *"Improved connectivity to the town centre from all parts of the town by public transport, walking and cycling"*.

Each SUE will also provide *"integrated transport networks which focus on sustainable transport nodes with strong links to the town centre"*. Each SUE will also be expected to provide a local centre, which will provide varying levels of local retail provision, whilst in some cases other community and leisure facilities. This will enable people to meet their local shopping and service needs in close proximity to their homes.

The Northampton Transport Strategy will provide *"Improved Connectivity to the town centre from all parts of the town by public transport, walking and cycling"*. This will improve the connectivity of the town centre to the outer suburbs and encourage more people to visit the town centre. In addition, revised parking standards across the whole of Northampton will be delivered. Policy N10 states that *"No further comparison goods floorspace is required outside Northampton Central Area other than to support the vitality and viability of local centres"*. This will help the town centre become more competitive, under the provisions of PPS4.

It is felt that the hierarchy specified in Policy S2 is not too rigid and will enable development at these centres. For example, the Policy outlines that *"The Vitality and Viability of these Centres should be maintained and enhanced commensurate with their role and function"*, which will encourage the development of these centres. The development of these centres however must not *"put at risk future investment in Northampton Town Centre or the Implementation of the Northampton CAAP"*. The Abington and St Catherine's Hospice is too small a centre to be added to the retail hierarchy.

The Transport Strategies for Brackley and Towcester outline that the parking provision for Towcester and Brackley will be reviewed. The strategies also promote walking and cycling within the town as an alternative to car journeys. In addition, each SUE will deliver an integrated transport network with sustainable transport modes. The Transport Strategies also promote enhancements to the inter-urban bus

services. These measures will help improve the public transport within the towns and ensure an adequate supply of long and short term car parking.

The bus station is to be relocated as part of the NCAAP proposals. No evidence has been provided as to why housing should be built instead of extending the Grosvenor Centre. More housing is proposed in the town centre through the NCAAP. However, Northampton town centre needs to remain competitive and the redevelopment of the Grosvenor Centre will help achieve this goal. If the Grosvenor Centre were not redeveloped this could lead to the centre becoming more deprived which could lead to an increase in the deprivation of the whole town.

It is accepted that out-of-centre retail development has harmed the town centre. The Transport Strategy will deliver improved connectivity to the town centre from all parts of the town by public transport, walking & cycling and revised parking standards across the whole of the town. No further comparison goods floorspace is needed outside Northampton town centre, with most of the new comparison and convenience shopping growth occurring in the town centre. This will help reduce the leakage of comparison and convenience expenditure to out of centre retail parks.

Recommended Action

The policy approach to the Hierarchy of Centres is set out in Policy S2 of the PSJCS and has had full regard to the representations received. It is recommended that this policy approach is confirmed.

Question 40

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

Summary of Representations

Total	Support	Object	Gen. Comments
1115	112	607	396

Summary of issues raised by objectors

- This is just a list of words it does not form a cohesive policy description and unsure whether this policy can be implemented or achievable
- Require clarification as to whether this is to be applied to new developments.
- It takes people to create communities not policies and forced growth will not produce the community spirit that is sought
- These proposals and growth levels will create dormitory settlements and seeks to destroy communities and make community spirit disappear
- An assessment of what make a good neighbourhood work is required to ensure that the proposals provide functional and well-balanced neighbourhoods when completed.
- Existing neighbourhoods should be improved before new ones are built. Village communities must be protected; they are the only real communities left.
- Areas must develop naturally.
- No information provided pertaining to villages / rural areas.
- Existing development sites at Northampton must be completed and adequate services provided before bringing other development forward and there is concern about change in mix and tenure of existing quality residential areas.
- Define settlement hierarchy and make it part of a Development Plan Document (DPD).
- Towcester and Brackley is one neighbourhood.
- Provide a church-come-community centre to encourage a sense of community identity.
- Unclear what 'legible pattern of streets' means.

Joint Planning Unit Response

A neighbourhood focused strategy sits well with current thinking in terms of setting priorities and providing a framework for services delivery. Policies in the JCS will enhance the ability of existing neighbourhoods to thrive through programmed regeneration and the implementation of the Sustainable Urban Extensions (SUEs) will assist the creation of new communities.

The key objective of the approach is to promote community cohesion, safe liveable environment in all of West Northamptonshire. Although it is recognised that there is no exact definition of what makes a neighbourhood, the JCS seeks to develop local areas with distinct identities and recognisable sense of place.

Local perceptions of neighbourhoods may be defined by natural dividing lines such as roads and rivers, changes in housing design or tenure, or the sense of community

generated around centres such as schools, shops or transport links. The JCS makes no attempt to provide a universal definition but considers that different areas within West Northamptonshire have their own particular needs which can best be met locally. The JCS will assist the preparation lower order plans and these would serve as the vehicle for the implementation of community development at the neighbourhood level.

The JCS will provide the framework to deliver the necessary physical, social and green infrastructure to support both new and existing neighbourhoods and communities.

The JCS defines a hierarchy of settlement this strategy more intensive integration of public services can be achieved within the context of their area or their street. Neighbourhoods will enable us to be more responsive, efficient and effective particularly with regard to our use of resources.

The JCS recognises the role of existing settlement but planned rather than forced growth underpins the policies in the plan, based on realistic assumptions and objectives. It is important that the residents of West Northamptonshire continue to have the opportunity to participate in a wide range of methods to help drive improvements in local services.

Recommended Action

A specific policy on neighbourhoods is no longer included in the PSJCS. Support for existing and new neighbourhoods will be provided by a range of policies in the PSJCS such as the regeneration policies and the individual policies on SUEs.

Question 41

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

Summary of Representations

Total	Support	Object	Gen. Comments
842	100	711	31

Summary of issues raised by objectors

- Given the fact that rural areas make up a large part of JCS area and support a range of communities; the strategy for delivering sustainable levels of growth in key rural settlements needs to be more robust.
- The policy approach should not leave the identification of the rural areas and definition of key rural service area to a later site allocation DPD, which is poor planning and confusing. Objectors have emphasised that the policy approach could be enhanced by providing a definition for a settlement hierarchy/robust criteria for determining which villages are key rural service centres, clarify the level of provision that will be made for housing/employment growth within the villages and urban/rural areas.
- A number of recommendations have made in relation the settlements that could be classified as Key Rural Service Areas. The following villages/locations have been put forward: Passenham, Old Stratford, Long Buckby, Silverstone, Kilsby and Crick.
- There is a concern that the policy approach is too restrictive and needs to be widened to bring forward proposals to support in a proactive manner, a vibrant and diverse rural economy. Further emphasis has been made on the need for policy to allow some residential development and some services in reasonably sustainable villages (i.e. located close to major employment areas) and not just Key Rural Centres. In addition, the policy should also try to promote regeneration, rural employment and tourism.
- The Policy does not go far enough. It should not just settle for development at the most sustainable locations but should seek to make all locations more sustainable. Also reference has been made of the need for policy to emphasise the importance of providing good transport/communication links to support the provision of rural services in larger centres.
- Detailed consideration should be given to the particular circumstances of the rural settlement in terms of their function and their environmental qualities.
- The policy needs to address the decline of smaller villages due to the development of larger villages.
- Criticisms has been raised in regards to Para 6.91, which has failed to note that a large proportion of the population of Daventry and South Northamptonshire live in rural areas.

Joint Planning Unit Response

The rural strategy needs to support the sustainable development of rural settlements. The PSJCS sets out a clear framework for identifying the rural settlement hierarchy, but does not specify which settlements should be included. This will be done in Development Plan Documents (DPDs) prepared for the rural areas of Daventry and South Northamptonshire Districts. Issues regarding specific villages will be addressed in these documents.

The policy approach in the PSJCS is more flexible and promote a limited level for development in villages outside the key rural service centres, and also promotes rural employment, the diversification of the rural economy, regeneration, sustainable communities (i.e. affordable housing for rural workers), and tourism.

The policy approach in the PSJCS also addresses wider sustainability factors i.e. access to public transport, employment, housing and the need to protect the character of rural areas/environment.

The PSJCS policy indicates that development will be guided by a settlement hierarchy but the approach provides scope to meet local needs for housing and other development across a wide range of settlements. This policy approach will be developed in more detail in DPDs for the rural areas. This will provide the opportunity to address the decline of smaller villages, particularly where this is supported by the local community.

The PSJCS, at Para 16.1, notes that a high percentage of the population of Daventry and South Northamptonshire Districts live in rural areas.

Recommended Action

That the policy approach to the rural settlement pattern of West Northamptonshire as set out in Policy R1 of the PSJCS be confirmed.

Question 42

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

Summary of Representations

Total	Support	Object	Gen. Comments
1092	107	586	399

Summary of issues raised by objectors

- Policy approach is merely a list of words that cannot form a cohesive policy. The strategy only identifies areas and lacks detail on how regeneration is to be achieved. No action / implementation plan is proposed.
- Investment should be directed to improving facilities and infrastructure and improving Northampton Town Centre. Brownfield land in the centre can be regenerated and contribute to housing targets.
- Policy approach is not clearly stated and this policy is not required.
- Inequality is not the same as deprivation. Deprivation may arise from building at high densities. Poor areas need to be addressed specifically not equated with 'taking from the rich'
- Policy is doomed to failure unless behaviour patterns can be changed. Paragraph 6.10.1.2 smacks of social engineering. Lack of detail and cohesive policy implies the areas are not considered to be important in the overall scheme of the plan.
- Concern, that the scope of the JCS is too limited to achieve this aim. In order for this perceived inequality to be addressed,
- External interference is not necessary. Brackley and Towcester are thriving; there is no requirement for regeneration at these towns.
- Must regenerate area between Castle Station and Kingsthorpe along the railway line
- Policy approach fails to recognise new regeneration instead focussing on the renewal of existing communities.
- Further explanation required on how the communities affected will be engaged as part of the regeneration proposals.
- Development at Overstone Leys will assist the regeneration of deprived areas of Northampton north by providing employment opportunities and facilities and services.
- Housing in rural countryside will destroy the attractive villages.
- Some deprived areas are a result of previous planning failures. The policy should address how physical alterations can improve the environment and neighbourhoods.
- Distinction must be made between 'old areas' which have historically been less affluent and poor quality areas as a result of poor planning.
- The town and its centre must be regenerated to encourage people to visit.
- Rectory Farm and Ecton Brook require regeneration.
- The building of the A45/M1 road will not assist the regeneration of Northampton but will rather increase southern flow of employment, retail, and leisure.

- Architectural regeneration of buildings in failing wards must be considered.
- Regeneration outside the priorities areas must be considered and priority areas could change over the plan period.
- NCAAP is in direct conflict with the EJCS.

Suggestion

It has been suggested that public sector as well as the private sector funds should be directed at assisting existing communities funds to assist in facilitating and developing the new communities. It was also suggested that the terms 'renewal, redevelopment or clearance' should be clarified.

Joint Planning Unit Response

Government policy requires adequate measures to be taken to support regeneration. The JCS recognises this as an issue that should be addressed. The policy approach in the PSJCS provides more detail including an overall strategic policy on delivering community regeneration as well as policies relating to specific regeneration areas in Northampton and Daventry

The Monitoring Framework will include specific indicators and targets to monitor the implementation of policies and highlight where policy is not working as intended. The policy approach is flexible and will enable the identification of different priority areas over time.

There is nothing in the policy approach to suggest a narrow pursuit of one aspect of regeneration or the other. A balanced approach demands that priority should be given to the area of greatest need and it is the case that the community will shape and influence the implementation programmes at every stage through the ongoing public engagement process. Detailed regeneration proposals for the areas specified in the JCS will be developed through community engagement.

Sustainable development principles underpin the strategy and policy approach to the plan. By carefully selecting the location of development and ensuring high quality design future development should enhance rather than diminish the attractiveness of rural country side or villages.

There is a requirement for Councils to consider the chain of conformity in preparing their JCS. Other development plan documents to be included in the LDF folder should conform to the JCS. Accordingly, and as prescribed by paragraph 5.1 of PPS12, it is the case that the NCAAP is in conformity to the JCS.

Recommended Action

That the policy approach to delivering community regeneration as set out in Policy RC1 of the PSJCS be confirmed.

Question 43 - Do you support the policy approach for Designing in Quality into new and existing developments?

Summary of Representations

Total	Support	Object	Gen. Comments
837	795	23	19

Summary of issues raised by objectors

- Who decides quality and standards? It can vary by area.
- Only public money will provide quality and this is not provided for in the plan.
- This policy approach does not go far enough in setting energy efficient standards and carbon neutral build quality.
- Whilst the principle of good design is supported, policies and guides cannot control this. Only good designers can create good designs.

General Comments

- The JPU needs to do research into building forms to inform future development.
- Consider the use of Northamptonshire stone wherever possible.
- Does quality refer to layout, bricks or both?
- What is quality and how will it be measured?
- Design must consider local designs, needs, knowledge and experience.
- Design quality needs to be judged by locals as well as professionals. The locals have to live with it.
- Bring back Parker Morris Standard.
- The design approach should highlight the need for an understanding of the character of an area, including its historic and landscape/townscape character.
- This policy needs to be cross-referenced to sustainable construction/climate change issues.
- Each town should have a separate and unique identity.
- Quality needs to include buildings of the highest environmental standard, including heat recovery systems, solar panels, water recovery systems and wind turbines. The relationship to public transport needs to be considered.
- The use of tools like master plans and design codes are essential to ensuring high standards are achieved.
- Need to stress quality over quantity.
- There should be no coalescence of villages, so as to ensure rural character is maintained.
- Concerned that Daventry has two sets of master plans/visions. This is wasteful.
- Secured by Design and the contribution that design can make to crime prevention needs to be addressed in this policy approach.
- High quality design can be encouraged through competitions, focus groups and local architects' societies.
- Local distinctiveness and enhancement of built character in new developments is essential to good design.

Joint Planning Unit Response

PPS1: Delivering Sustainable Development extols the virtue of good design and encourages planning authorities to deliver attractive usable, durable and adaptable places. Good design is central to good planning. The JCS will ensure high quality and good design in all development. Both public and private bodies have responsibility to ensure high standard and quality of development. It is not always the case that quality equates higher cost.

It is important for both private and public bodies to continue to play their parts in the effort to promote sustainable development. Policy S10 of the PSJCS sets out the sustainable development criteria that all new development should meet. The IDP being prepared as part of the JCS gives clear indications of the funding regime. This will allow greater coordination of all funding.

Extensive research and evidence form part of the process of JCS preparation. If and when gaps have been identified further research may be commissioned in an addition to existing and ongoing studies.

Detailed guidance on design and technologies devices such as solar energy are not appropriate issues for the JCS, but could be addressed in supplementary guidance. Policy BN5 outlines that all new development will *“Protect and enhance the features which contribute to the distinctive character of the area including Conservation areas, significant historical landscapes, the skyline and settings of towns and villages, sites of known or potential historical significance and locally and nationally significant buildings and structures”*. This policy will ensure that development considers local design, needs, knowledge and experience, respects the historic landscape/townscape and maintains the local distinctiveness of an area.

Local People will be consulted when a planning application is submitted and will be given the opportunity to comment on the design of the proposed development through this process.

The JCS provides a broad framework for directing and managing development in a sustainable manner and it is not an appropriate vehicle for promoting prescriptive standards as being suggested. The Parker Morris standard was produced in the 1960's and *“provided typical dimensions for the typical items of furniture for which the dwelling designer should allow space”*. All new residential developments have to adhere to the Code for Sustainable Homes Level 4 and Lifetime Homes Standard as this is more appropriate.

Within the broad framework of the JCS there is opportunity to prepare other Development Plan Documents (DPDs) including masterplans. The adopted Local Development Scheme (LDS) contains a list of other plans to be prepared by partner authorities. The JCS together with these plans will ensure that each town will maintain its own unique identity.

In regards to the relationship with public transport, Policy S10 also outlines that all new development will *“Be located where services and facilities can be easily accessible on foot, bicycle and by public transport”*. All of these principles will ensure that buildings are to the highest environmental standard.

There is no requirement for West Northamptonshire JCS to mimic North Northamptonshire Joint Core Strategy. If considered appropriate reference may be made to the issue of coalescence.

Although Daventry does have a separate master plan and vision, these have been produced by Daventry District Council and not the JPU. The proposals contained within the PSJCS for Daventry reflect the vision and master plan for Daventry.

The JCS will contain sufficient guidelines on community safety and policies in the plan will ensure that that crime reduction form part of the design consideration. The relevant local authority will then determine whether the design does indeed meet the strict criteria that they have set.

Recommended Action

The policy approach on designing in quality is now included principally in Policy S10, Sustainable Development Principles in the PSJCS and is also reflected in individual policies relating to the SUES and within the Built and Natural Environment Section. It is recommended that this approach is confirmed.

Question 44

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

Summary of Representations

Total	Support	Object	Gen. Comments
1232	132	1201	18

Summary of issues raised by objectors

- The countryside should be preserved from development, Brownfield sites should be developed first. Also the protection of villages and their rural hinterland will secure green infrastructure.
- There is a concern that the development of the option will have an adverse impact on the environment. Also it was indicated that no mitigation measures will reverse the damage if greenfield sites are developed and the arable land is required to make the UK self sufficient in food production
- Developer contributions are unlikely to secure Green Infrastructure (GI) requirements. The policy approach states it expects developers to contribute to GI and the provision of off site should be an option, if it cannot be provided on site. This will not be sufficient to secure funding as section 106 funding is not always provided. Further, it has noted that it is unclear how the enhancement of GI will be achieved in areas away from the development areas.
- The JCS should seek an overall net gain in GI.
- The JCS must consider the implications of the GI Study and Landscape Sensitivity studies more fully, to ensure that development is directed away from sensitive areas and to identify opportunities for enhancements. Further, the criticism has been raised that there is no evidence of creative thinking as to how the general concept of GI might be translated into principles that have guided the selection of the development options. The danger is that GI will be seen as another charge on development and not a key feature in determining the development form. Insufficient detail has been provided to comment on this approach and the encouragement of development proposals that improve the quality, quantity and accessibility to green space must be sought.
- GI must not be confused with a network of streets and cycle ways that provide connections between and within areas.
- Like North Northamptonshire JCS, the West Northamptonshire JCS should identify Nene Valley Corridor as a sub regional corridor which should be reflected throughout the document.

Joint Planning Unit Response

To promote the sustainable growth of the plan area and address the causes/impacts of climate change, a certain level of development will have to take place on greenfield sites to meet the partner Council's social, environmental and economic needs. The PSJCS will be supported by a Sustainability Appraisal (SA) which assesses the proposals against sustainability objectives and ensure measures are incorporated to minimise/eliminate any adverse economic, social and environmental impacts.

A policy to encourage the development of brownfield sites has been included in PSJCS and the careful phasing of the development of strategic growth sites will encourage the regeneration of brownfield sites.

The grade of farming land will be one of the sustainability considerations that will be taken into consideration when determining the scale, type and location of development and the master planning of schemes. Where possible, the development of high grade farming sites will be avoided, unless other sustainability considerations override the perceived benefits of preserving the site for farming use.

An IDP is being completed to support the content of the JCS. This will identify the entire infrastructure that is required to support the sustainable growth of the JCS areas, the funding sources/gaps and potential strategies for addressing gaps. This will also be supported by viability studies which will ensure viability of the growth options is not undermined by developer contributions. Finally, based upon the latter studies a Community Infrastructure Levy (CIL) is expected to be adopted to support the provision of GI and other infrastructure across the JCS area.

The strategy will seek to enhance, restore and create new GI networks, but an overall net gain in Green Infrastructure may not be deliverable.

Based upon the evidence base that has been collected, the PSJCS now identifies the corridors which are of sub-regional and local importance and includes measures for enhancement (i.e. quality/quantity), the creation of new/ networks and the improvement access to green infrastructure.

The policy approach included in the PSJCS recognises the importance of GI for biodiversity and Policy BN1 includes provision for wildlife habitats, the planting of native species, and protection of natural features.

In respect of the classification of Nene Valley a specific Policy BN8 is included in the PSJCS in recognition of its importance as a strategic corridor, including its value for biodiversity.

Recommended Action

That the policy approach to GI, as set out in Policy BN1 of the PSJCS, is confirmed.

Question 45 - Do you support the policy approach in relation to Culture and Cultural Heritage?

Summary of Representations

Total	Support	Object	Gen. Comments
838	139	681	18

Summary of issues raised by objectors

- No support or adequate facilities are provided for inter-faith, inter-cultural and inter-community initiatives;
- No evidence that charitable organisations have been consulted on this policy approach;
- Policy approach only supports culture in certain places; it should be encouraged everywhere;
- This policy does not specify sites to be protected;
- The huge metropolis that this plan will create will not preserve the heritage and conservation areas or the individuality of towns;
- Present “cultural policies” have resulted in the deplorable, unsafe weekend evening binge drinking culture; this policy will only encourage this further;
- Policy doesn’t cover personal safety issues as a result of current evening culture;
- A clearer definition of what the policy actually means is required;
- Culture & Heritage are two distinct issues and should be addressed separately;
- Supporting the evening economy will give rise to more alcohol related injury, thereby further straining the already stretched Accident and Emergency department at Northampton General Hospital;
- Church buildings, church history and church communities need to be mentioned, as does the role of church buildings as tourist attractions;
- Instead of promoting diverse culture, we should recognise the rights of the indigenous people of this country;
- Notion that a village hall or pub is focus of rural culture is untested & incorrect;
- This policy needs to also protect landscapes; and
- Policy approach is too restrictive, and will discourage regeneration of Brackley.

General Comments

- Policy needs to include provision for people to exercise their religious beliefs and/or meet as faith communities. Government guidance in ‘Face to Face and Side by Side’ and ‘Cambridgeshire Horizons’ are good practice guides;
- A new Village Hall that will benefit Overstone Village is envisaged;
- Weedon Depot needs to be protected and recognition given to its national importance. To achieve this, viable uses must be encouraged on-site;
- The green environment also needs to be protected in this policy approach;
- The Northampton South East area is unusually rich in archaeological heritage and this must be protected;
- More places for Christian worship are needed;
- Given Northampton’s historic importance for the shoe manufacturing industry, creation of a high quality, handmade shoe manufacturing and marketing centre is needed;

- As Boudicca's last stand was in this locality, it would be an ideal subject for a museum exhibition;
- We are still waiting for a museum at Cogenhoe;
- Brackley wishes to have an exhibition gallery and performing arts centre;
- A clear distinction needs to be made between the provision of cultural facilities and the strategy for managing the historic environment;
- Key areas for action need to be set out in the Core Strategy;
- Daventry needs to benefit from this policy approach. In particular, leisure outlets need to be put forward speedily and matching the needs of Daventry's dwellers;
- Glossary should contain definition of what "A4, A3, D2 and D1" uses are;
- Is a need to consolidate strength and build for future, not protect fossilisation;
- Policy should include an ambition to greatly improve tourist information services;
- The Culture and Heritage policy should be moved to a position between 'Designing in Quality' (6.10.2) and 'Green Infrastructure' (6.10.3);
- If Northampton is to become a city, make it distinctive and build upon the existing heritage;
- Daventry Water Space should be added to the bullet point relating to Daventry Town Centre;
- A dedicated department is needed to ensure archaeological sites are respected;
- This policy needs to apply to villages too, not just the towns;
- Implications of management, maintenance costs & means of funding need to be addressed (e.g. establish trust with asset base as Milton Keynes Parks Trust);
- More mention needs to be made of the provision and protection of cultural facilities in Daventry, particularly Daventry Town Museum;
- With regards to the evening economy, it should be specified that some uses would not be appropriate in certain locations;
- Theatre provision and public art needs to be addressed here.
- This section needs to refer to preferred proposals within other DPD's;
- This section could benefit from reference to a new archaeological archive; and
- The West Northamptonshire Joint Planning Unit needs to ensure that this plan, and particularly this policy, is in accordance with the revised PPS 15.

Joint Planning Unit Response

Policy RC2 outlines that new residential and commercial development will be required to make provision for community facilities and public open space in accordance with the standards set out in the PPG17 studies and identified within the West Northamptonshire Sports Facility Strategy and the Cultural Investment Plan. This will ensure that adequate facilities are provided for inter-faith, inter-cultural and inter-community initiatives.

The Charitable Organisations are statutory consultees and were therefore consulted with during previous consultation stages.

Policy BN5 protects within the whole of West Northamptonshire. It outlines that *"Heritage assets and their settings will be conserved and enhanced in recognition of*

their contribution to West Northamptonshire's sense of place". Therefore culture is supported throughout West Northamptonshire.

The Site Specific Allocations DPD will specify those areas that are to be protected. It is not the responsibility of the JCS to list every site that is to be protected. More information on specific areas where more investment will be made can be found in the Cultural Investment Plan and IDP.

Conservation areas and the individuality of towns will be protected through Policy BN5, which specifies that all new development will "*sustain and enhance the features which contribute to the character of the area including: Conservation Areas and the skyline and settings of towns and villages*";

The reference to the JCS supporting the evening economy in regards to bars and restaurants has now been removed from the PSJCS. However, it is recognised in paragraph 7.26 that public houses and restaurant are important cultural and heritage assets in West Northamptonshire that will be retained.

Policy S10 outlines that in order to achieve the overarching goals of sustainability development will: achieve the highest standards of design including in relation to safety and security. This will help improve safety issues associated with the evening economy and any new development that supports it.

No explanation has been given to what a 'clearer definition' is. More information on how new development will protect existing heritage assets is provided through Policy BN5. In addition, information on how cultural assets will be protected and managed has been provided in the Cultural Investment Plan, as well as the IDP detailing how this will be funded.

Culture and Heritage are addressed separately to an extent by the PSJCS. Cultural Assets for example are discussed in paragraphs 7.25 – 7.27, whereas Heritage is discussed throughout the PSJCS, particularly Policy BN5 (The Historic Environment).

However, Culture and Heritage are also intrinsically linked. For example, paragraph 7.26 outlines that "*West Northamptonshire provides a distinctive cultural offer, which ranges from its archaeological heritage, extensive canal and inland waterway network and heritage assets*". Heritage assets are also one of the typologies that have been mapped when producing the Cultural Mapping Report.

Specific support for bars is not highlighted in the PSJCS. The only reference to the evening economy in the PSJCS is in the "Arts and Entertainment Section", which outlines that "the current level of provision does not reflect the active arts community and the desire for additional, diverse entertainment facilities, particularly as part of developing the evening economy". This is a detailed matter for DPDs dealing with development management issues.

The value of church buildings has been recognised through Policy BN5, which ensures that all new development will expected to maintain and enhance the historical assets of West Northamptonshire.

To recognise the rights of the 'indigenous people' of the country over any other ethnic group is unethical and does not create equal opportunities that the PSJCS seeks. This is not supported in the JCS.

The reference to the village hall or pub being the focus of rural culture has been removed from the PSJCS. It is however recognised in the assessment of rural hierarchy section (paragraph 16.10) that the Village Hall/ Community Centre is a *"Most Important Service and Facility"*

Policy BN5 does include the protection of landscapes. It outlines that all new development will *"Protect and enhance the features which contribute to the distinctive character of the area including: Significant Historical Landscapes"*.

No evidence has been provided as to why the Policy Approach is too restrictive and discourages the regeneration of Brackley. The Spatial Strategy for Brackley (Policy B1) sets out a wide range of new developments that will be provided, including health provision including a new primary healthcare centre and a 60 bed unit for elderly care. However, the new development proposed in Brackley will be expected to sustain and enhance the features that contribute to an area through Policy BN5.

As highlighted earlier, Policy RC2 ensures that new development will make provision for community facilities. In addition, paragraph 7.30 states *that "the provision of social and community infrastructure, including the provision of facilities for worship, is fundamental to the creation of strong neighbourhoods and local identity"*. Therefore the JCS does include provision for people to exercise their religious beliefs.

The Site Allocations DPD will outline the redevelopment of Overstone Village Hall. It is recognised in the rural hierarchy section of the PSJCS that a Village Hall is one of the most important facilities in a village; however it is unclear how this redevelopment will be funded.

Policy BN6 recognises the value of Weedon Depot and specifies what viable uses would be encouraged on site. This would include a Museum (Class D1), Employment (Class B1), Retail (Class A1), Restaurant/Cafe/Drinking Establishment (Class A3, A4 and A5), other Leisure, Tourism and Recreation Uses or Residential. Any proposal on site would *"need to preserve and enhance the cultural and heritage value of the site by ensuring that the re-use of existing buildings and any new building is undertaken in accordance with an agreed conservation plan"*.

The green environment is protected through Policy BN1. This outlines that new GI will *"reflect local character through the planting of native species and consideration of natural and cultural heritage features"*.

The archaeological heritage of Northampton South East will be protected through Policy BN5. It states that *"Heritage Assets and their settings will be conserved and enhanced in recognition of their contribution to West Northamptonshire's sense of place"*.

The community facilities provided within SUE proposals will include new places of worship where needs are identified.

The previous role of Northampton as the major centre for shoe manufacturing is highlighted in paragraph 12.1. It will however be the role of either the Site Specific Allocations DPD or more local documents to identify and propose a marketing centre.

The suggestion regarding a museum related to Boudicca's last stand is too detailed for inclusion in the JCS, but could be considered in lower order plans.

The overall strategy for Brackley would support the provision of an exhibition gallery and performing arts centre in Brackley. This could be promoted through the Brackley Masterplan.

A clear distinction has been made between the provision of cultural facilities and the management of the historic environment. The provision and maintenance of cultural facilities is discussed in paragraphs 7.25 – 7.27, as well as the Cultural Mapping and Cultural Management reports. The Management of West Northamptonshire's Cultural Facilities is discussed throughout the PSJCS, but specifically Policy BN5.

It has not been made clear as to why the JCS should set out key areas for action. This is the responsibility of the Site Allocations and other Development Plan Documents. The JCS does however make reference to the fact that the cultural assets have been mapped onto the Cultural Mapping Report (CMR). This in turn has informed the CMR, which has set out a number of investment areas. The level of investment will be discussed in the IDP.

Policy D1 (Regeneration of Daventry Town) highlights that to support the vision of Daventry becoming a sustainable town with 40,000 residents, the *"provision of leisure and tourism development within the town centre via redevelopment and including an extension to Daventry Country Park"*.

In addition Policy D2 sets out that new leisure development will occur within and adjoining Daventry Town Centre. The Daventry North East SUE will also provide *"enhanced sport and leisure provision"*. The location of these new leisure outlets will be highlighted in the Site Allocations DPD.

A definition of the use class order shall be added to the Glossary.

Whilst there is a need to build for the future, this should not be done at the expense of the county's heritage assets. Policy BN5 ensures that new development will protect the county's existing heritage assets.

Policy E7 discusses tourism, visitor and cultural industries. It outlines that *"Tourism, Visitor and Cultural development will be supported where they contribute to the achievement of regeneration aims and objectives, strengthen the overall tourism offer, benefit local communities and businesses and development is of a use, form and scale which does not harm the quality of the natural or built environment"*. This will ensure that tourism service provision will improve over the plan period.

No explanation has been given as to why the Culture and Heritage Policy should be located between Designing in Quality and Green Infrastructure. Policy BN5 is located in the Built and Natural Environment Section, which deals with Green Infrastructure Connections and Flood Risk for example.

Policy E7 supports the new tourism, visitor and cultural development proposals. New development will also be expected to protect and enhance existing heritage assets through policy BN5. This will help Northampton build upon its existing heritage.

No reason has been given to including Daventry Water Space within the Daventry section. Any development here would be discussed in the Site Allocations DPD.

The Northamptonshire County Archaeological unit ensures the protection of all the archaeological sites within Northamptonshire.

Paragraphs 7.25-7.27 discusses in detail the management of cultural assets. The CMP has mapped the heritage assets within West Northamptonshire. This document has informed the preparation of a CIP, which has identified a number of areas for investment. This identifies how some of the area's cultural and heritage assets will be managed. The key elements of this Investment Plan have been included in the IDP, which sets out how and when the financial investment in some of the areas cultural assets will be made.

No specific reference is made to the protection of Daventry Town Museum. However, all new development will be expected to protect and enhance existing cultural and heritage facilities through Policy BN5.

The evening economy reference has been removed from the PSJCS. The only reference to the evening economy is in the Arts and Entertainment section, which outlines that *"the current level of provision does not reflect the active arts community and the desire for additional, diverse entertainment facilities, particularly as part of developing the evening economy"*. The relevant Development Control Authority will determine whether a development proposal is suitable to that particular location.

Arts and Entertainment have been discussed in paragraphs 7.28 and 7.29. It is outlined that *"the NCAAP contains proposals for an enhanced cultural offer within Northampton's town centre. There are additional plans prepared by each of the local authorities, Northamptonshire County Council and Northamptonshire Enterprise, which aim to develop new facilities and to enhance existing facilities, for arts and entertainment in order to diversify the existing offer"*. It has not been specified what these 'additional plans' are, reference to which could be made in the footer.

It has not been specified what the 'other DPD's' are, nor as to why specific references to 'preferred proposal' need to be made. It is not the JCS's responsibility to specify specific allocations; this will be dealt with through the Site Specific Allocations DPD. The majority of DPD's have not yet been prepared and work will only commence on the documents once the JCS is close to adoption.

The County already has an archaeological record. This is known as the Sites and Monument Record and is available to view for free by the public.

PPS 15 has been taken into account when preparing the JCS. This is discussed in Appendix 1 of the PSJCS, which discusses what plans and other strategies were taken into account in the preparation of the JCS.

Recommended Action

The policy approach to Culture and Cultural Heritage is spread across a number and policies and sections within the PSJCS as outlined in the JPUs response above. This approach reflects the responses received and it is recommended that it be confirmed.

Question 46

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

Summary of Representations

Total	Support	Object	Gen. Comments
622	121	478	23

Summary of issues raised by objectors

- The Nene Valley should be protected (i.e. Nene recreation area, Upper Nene Gravel Pits potential SPA). The proposed expansion sites, particularly in the Northampton SE, impinge on these natural areas and raises questions whether alternatives options were more appropriate.
- In relation to the Northampton SE option, it has been argued that the JCS has disregarded the results of the combined landscape and biodiversity sensitivity results as they apply to Great Houghton. It has also been noted, this option is located on prime agricultural land and ancient hedgerows.
- It is questioned why Para 6.10.5.3 only refers to the creation of woodlands and tree planting and not other habitats of significance such as acid grassland and heathlands as identified in the Biodiversity Action Plan (BAP). Also the Landscape Sensitivity and Green Infrastructure (GI) studies should have been used to identify opportunities for enhancement.
- The policy will need to clarify how negative impacts of development will be mitigated against (i.e. the compensatory measures for the loss of biodiversity).
- The policy approach must indicate an understanding of the landscape and townscape. This needs to be taken into account in the design and implementation of all new developments. Also there is lack of acknowledgement of landscape protection and the needs to restore and tackle current neglect.
- The policy approach should take into account Natural England's standards for green space and Woodland Trust's woodland access standards should form part of the strategy.
- The growth being proposed by the JCS, particularly Greenfield sites will not achieve a significant net gain in biodiversity. Also small areas of GI or the relocation of habitats can not mitigate, compensate for the loss of loss of biodiversity, landscape and habitats.

Joint Planning Unit Response

The Northampton South East proposal has not been included in the PSJCS. The smaller SUEs proposed at Northampton South and South of Brackmills do not affect the natural areas referred to by the objectors and will have a reduced impact on landscape and biodiversity. These proposals will be supported by an Appropriate Assessment, where necessary, to assess their impact on the Upper Nene Gravel Pits potential Special Protection Area (pSPA) and any other European Union protected sites, and identify any mitigation measures that are required.

It is agreed that the creation of other habitats such as grassland/wetlands, to support biodiversity could be explored. Also it would be useful for the policy approach to highlight any measures that may need to be taken to mitigate against the negative

impacts of any growth proposals. Policy BN2 of the PSJCS addresses both of these issues.

It is accepted that the policy approach focuses on biodiversity, the proposed PSJCS also includes consideration of the landscape, for example there is a specific section on the Historic Environment and Landscape. The SUE proposals have been identified having regard to the evidence contained in the Landscape Sensitivity studies for the four main towns. The SUE policies include specific provisions relating to landscape protection and enhancement.

The JCS does not include specific reference to Natural England's access to natural green space and the Woodland Trust access standards. These have been considered but the open space standards are based on up to date local studies rather than generic national standards.

The JCS is underpinned by a comprehensive evidence base, such as Landscape Sensitivity and GI studies which will inform the content of the document. Based upon this evidence base and other studies, a Sustainability Appraisal (and where necessary and Appropriate Assessment) is also being undertaken. This assesses the JCS proposals against environmental (as well as economic, social) sustainability objectives and will help determine what measures need to be incorporated into the policy framework to minimise/eliminate any adverse impacts on the environment, biodiversity, landscape and habitats.

Recommended Action

That the policy approach to Landscape and Biodiversity as set out principally in Policies BN2 and BN5 of the PSJCS be confirmed.

Question 47

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

Summary of Representations

Total	Support	Object	Gen. Comments
2076	113	1945	18

Summary of issues raised by objectors

- Climate change is a key issue that should be reflected more widely throughout the document. It should be a more prominent policy within the West Northamptonshire Emergent JCS and not just appearing as Question 47.
- The strategy must be more ambitious. Other low carbon renewable energy generation options must be explored (such as wind development, combined heat and power, local district heating systems, sustainable waste management, solar energy, small scale hydro projects) and implemented (both within and outside SUE), in order to promote sustainable development and address climate change. The policy approach for renewable energy should include measures to protect the natural environment and the amenity it affords.
- Further, it has been noted that cement production is one of the largest Carbon Dioxide sources.
- It requires clarification of the impacts of climate change on biodiversity, within the list of principle impacts (i.e. Para 6.10.6.3).
- This approach is not precise. Performance of housing must be related to existing national standards such as the Building Research Establishment's Environmental Assessment Method and the Code for Sustainable Homes. Imposing standards above those that are nationally required would be resisted.
- Criticism was raised that no significant measures are proposed to tackle climate change. More innovation is required in the design and implementation of new development now. Evidence of plans, standards and guiding principles needed to demonstrate commitment to this policy.
- There is a concern that the growth proposed by the JCS will have an adverse impact on the climate change. In particular, reference has been made to the reduction in agricultural yields through loss of farmland and increase flooding, water shortages, traffic, congestion and an increase in CO2 emissions/air pollution due to the four lane link road from M1 J15 to Northampton SE option.
- Northampton Sustainable Urban Extensions (South and South east) are to be built on a known floodplain. This will increase run off, and put pressure on inadequate drainage systems. The Plans do not account for this risk and must be re-evaluated. Also criticism has been raised to the unreasonable level of confidence placed on using Sustainable Urban Drainage Systems (SuDs) to mitigate the impact of climate change/flood risk.
- Failure to provide sufficient local employment/housing, retail shops, and public transport can only lead to increased vehicular movements. This approach cannot be supported.

- The strategy does not account for the contribution that rail freight can make to reduce carbon dioxide emissions. The strategy must acknowledge other non-road means of distribution.

Joint Planning Unit Response

It is accepted that climate change is a key issue which should be reflected throughout the document and that a more prominent policy could have been included in the earlier sections of the JCS because it can play a key role in promoting the overarching planning objective of promoting sustainable development. For this reason a section entitled '*Climate Change and Sustainable Development Principles*' has been included in the Spatial Strategy section of the PSJCS and a strategic policy (Policy S10) has been included in the strategy.

It is accepted that the strategy could explore the role that low carbon renewable sources; sustainable waste management/construction could play in addressing climate change and these principles are reflected in Policy S10 of the PSJCS.

The links between climate change and biodiversity are recognised and have been included in the 'Climate Change' section of the PSJCS.

It is accepted that the policy approach could incorporate national standards such as Code for Sustainable Homes, BREAM to promote the sustainable design of buildings and assess the performance of them, in order to address climate change. For this reason appropriate standards have been included in Policy S10.

A Sustainability Appraisal (SA) is being undertaken to support the content of the JCS. This examines all the JCS proposals against a range of economic, social and environmental objectives and ensures all the necessary measures are incorporated into the policy framework, in order to minimise/eliminate any adverse impacts, as well as address climate change and promote sustainable development. Also, an Appropriate Assessment (AA) is being undertaken, where necessary, to ensure that the JCS proposals will not adversely impact European designated environmental sites.

A Strategic Flood Risk Assessment (SFRA) has been undertaken. This will ensure that a sequential test has been applied to direct any proposed growth to areas that have a low risk of flooding (i.e. flood zones 1/2), as well as ensuring highly vulnerable land uses are directed away from areas at a high risk of flooding (i.e. flood zone 3A/B). Also where it is not possible to locate developments in areas at low risk of flooding, the SFRA will also examine the existing flood defence infrastructure and determine what measures may be required to make the sites safe from flooding.

The JCS will include measures to achieve a better balance between homes, jobs, services, retail/community facilities and sustainable transport measures, in order to reduce the need to travel and promote a greater self containment of urban/rural settlements. A large level of supporting evidence base for the JCS, such as the IDP, SA, etc will also help achieve a greater level of self containment in the area.

It is accepted that the JCS should acknowledge the role that non-road means of distribution could play in reducing carbon emissions. For this reason Policy C3 of the PSJCS refers to rail freight and the use of the canal network for freight movements.

Recommended Action

That the policy approach to 'Climate Change' as set out in Policy S10 of the PSJCS be confirmed.

Question 48

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

Summary of Representations

Total	Support	Object	Gen. Comments
2957	119	2821	17

Summary of issues raised by objectors

- There is a concern that the evidence base that is required for this policy approach (particularly the SFRA) should have been completed before consulting on the location, scale and measures required to combat the risk of flooding.
- Also it has been indicated that a Surface Water Management Plan should also be commissioned as part of the evidence base.
- There is a major concern that the scale of the proposed growth will inevitably increase the risk of flooding across the JCS area (i.e. Northampton SE SUE). The main reasons given for this view are inadequate drainage; development will prevent water run off capacity of the surrounding areas, the inadequacy of SUDS to mitigate the flood risk, and the effects of past flooding events in places such as Collingtree and Upton.
- There are concerns in relation to whether adequate levels of funding will be available for the flood prevention infrastructure that is required to mitigate any flood risk caused by growth. In particular, questions are raised as to whether developers will be able to fund for the significant level of flood mitigation measures needed for the level of development proposed.

Joint Planning Unit Response

A level 1 Strategic Flood Risk Assessment (SFRA) was completed to support the content EMJCS. This collects/analyses information in relation to historic occurrences of flooding events from all sources, the level flood risk in different places, etc. All the information collected from the SFRA 1 was taken into consideration in the EJCS to prevent locating vulnerable development in areas with a high risk of flooding. In addition, the Environment Agency has been consulted in the production of the EJCS. The evidence base has been developed further to underpin the PSJCS. This includes a more detailed level 2 SFRA and a Water Cycle Strategy for the whole area.

The SFRA identifies all the locations that are at a high risk of flooding, examines capacity of the flooding prevention infrastructure and identifies all the measures that strategic developments may need to take to make a development safe and ensure that it does not increase the risk of flooding to third parties. The scale of development proposed in the PSJCS is significantly lower than that proposed in the EJCS and the proposed SUE at Northampton South East has been deleted.

An infrastructure delivery plan has been prepared to support the sustainable delivery of the JCS. This identifies what infrastructure will need to be delivered, where, when, by who, as well as how any potential gaps in funding will be addressed.

Recommended Action

That the policy approach to 'Flood Risk' as set out in Policy BN7 of the PSJCS be confirmed.

Question 49 – Do you support the policy approach in relation to Health and Wellbeing and Leisure, Sport and Recreation?

Summary of Representations

Total	Support	Object	Gen. Comments
828	127	686	15

Summary of issues raised by objectors

- Although the importance of social infrastructure is recognised in the policy, previous experience suggests that it will not be provided.
- No mention made of Hospitals, Police or Fire Services that are basic needs for health & wellbeing and need to be provided before leisure facilities.
- Section needs to be strengthened to consider how growth can be shaped to promote healthy lifestyles, tackle obesity, mental health conditions and give access to expanded leisure facilities, along with access to the countryside for walking, cycling and equestrian activities.
- This lacks sufficient detail.
- The medical infrastructure for such high levels of development is neither available nor feasible. Northamptonshire is not an attractive destination for prospective doctors whilst existing practices cannot accommodate them.
- Financial pressures on NHS are not favourable to an expansion of provision.
- Building a new road to the M1 will result in additional pollution that will not improve the health and well-being of residents within West Northamptonshire.
- Developer led development will not consider local needs and circumstances.
- Too much emphasis is placed on sport facilities.
- Policy approach is unclear as there are major differences between the standards sought in Northampton, Daventry and South Northamptonshire.
- Detailed standards should not be included in the JCS, but rather in a subsequent allocations document.

General Comments

- More mention needs to be made of non-sporting clubs (e.g. church clubs, Scouts) as these have far more; “health giving/preserving” attributes than sports.
- Parks and Open Spaces are important but have little protection from development at present.
- This needs to be done for existing communities, let alone new ones.
- Why do Northamptonshire County Council wish to sell off disused playing fields when they could be used for recreation?
- Local newsagents, post offices, public houses and local farm produce shops should also be included.
- The network of rural pathways throughout West Northamptonshire are well used and already contribute to community well-being and health.
- In accordance with Planning Policy Guidance 17 : Planning for Open Space, Sport and Recreation, the quality of facility as well as the quantity of them must also be considered when determining recreation facility provision.
- This policy should be linked to the Green Infrastructure (GI) policy to ensure multi-functional use and benefit.

- In accordance with Circular 05/05, developers should only be expected to provide facilities necessary to mitigate the effects of their development. Identified existing shortfalls should not be funded by new development.
- Central Government funding will be needed given the large existing deficit of health and leisure facilities.
- It should be made clearer that relocation of facilities is perfectly acceptable if an improvement in quality or quantity results.
- There should be an explicit statement about the importance of design in securing health, particularly through active travel.
- Something should be done early to gain public confidence.
- Danes Camp Leisure Centre at Mereway District Centre can and should be upgraded to accommodate the leisure pursuits of local residents.
- New and upgraded facilities should only be used by local taxpayers, and not those from further afield.
- Development of the Bell Plantation Site would provide quality football facilities for the town and Towcester Town Football Club.
- Development at Northampton South would reconfigure, retain and enhance Collingtree Park Golf Course and provide sporting and recreational facilities.
- The Woodland Trusts "Access to Woodland" Standard should be mentioned.
- Sport/Leisure facilities need to be underpinned by a pool of trained staff and a strong network of clubs & associations to encourage Sport and Leisure activities.
- Reference should be made to Natural England's; "Accessible Green Space Standards".
- The Primary Care Trust estimates that the cost for additional healthcare infrastructure for the proposed development is £110.5 million.
- This should also include access to wild and rural areas.

Joint Planning Unit Response

The Infrastructure Development Plan (IDP) will set out what new infrastructure is to be provided as well as the timescale and specific infrastructure requirements are included in the proposed SUE policies.

The Fire, Health and Police authorities have been consulted during the preparation of the IDP. The local needs have been identified as part of this process and what new service provision is required to meet these needs. As part of this process, a timescale of when this new infrastructure is required has been specified. In some areas the provision of new leisure facilities maybe more pressing when compared with the emergency services, therefore the new leisure facilities maybe provided beforehand as a result.

Each SUE is expected to provide an integrated transport network focused on sustainable transport modes, including public transport, walking and cycling links. New and enhanced leisure facilities will also be provided at some of the SUE's, which will help promote healthier lifestyles and tackle obesity.

More information has been provided in each of the SUE's in regards to the level of leisure and recreational investment. Information of when these facilities will be provided is highlighted in the IDP.

As regards health provision the NHS and relevant PCT's have been consulted with during the preparation of the IDP to identify local needs and future levels of provision required to meet these. The SUE policies include health provision where this is required.

The new road to the M1 to which the respondent is referring is not included within the PSJCS.

Developer led development will be expected to take into account local needs and circumstances. Policy INF1 outlines that where new development will provide new infrastructure, *"it should seek to integrate with and complement adjoining communities"*.

Too much emphasis has not been placed on sport facilities. The IDP equally focuses on other key facilities such as health, community and education provision.

No evidence has been provided to demonstrate standards in Northampton, Daventry and South Northamptonshire vary. In addition, it has not been highlighted what these 'standards' are. The only difference between the three authorities is the level of provision sought, as some areas of West Northamptonshire are set to grow at a greater rate compared to others. Detailed standards are not included in the JCS, nor are any site specific allocations. This will be dealt with in the Site Specific Allocations DPD.

It is less sustainable to build a new settlement with brand new facilities, instead of the proposed urban extension which can help improve existing facilities. The creation of a new town would also mean it would be challenging for a new community to make maximum use of services and facilities within existing settlements. People will have to travel further to this new town compared to Sustainable Urban Extensions.

No evidence has been provided that non-sporting clubs have far more health giving/preserving attributes than sports. These are more social and community infrastructure facilities. Some of the SUE's proposed will provide new social and community facilities such as Scout groups.

In addition, Policy RC2 outlines that *"The loss of existing built sport facilities and areas of open space will be resisted unless it can be demonstrated that there is evidence that improvements can be made through the provision of a replacement facility of equal or better quality or the proposal will bring about significant community benefits that outweigh the loss of the facility"*. Therefore open spaces are quite rigorously defended.

Policy RC2 also outlines that *"New Residential and Commercial Development will be required to make provision for community facilities and public open space in accordance with the standards set out in PPG17"*. Therefore the provision of new open spaces in West Northamptonshire is also encouraged.

New development will take into account existing as well as new communities. Policy INF1 outlines that where new development will provide new infrastructure, *“it should seek to integrate with and complement adjoining communities”*

The development of playing fields is addressed in the provisions of Policy RC2 above, the loss of open space will be resisted unless there is evidence that improvements can be made through the provision of a replacement facility of equal or better quality or the proposal will bring about significant community benefits that outweigh the loss of the facility.

The importance of local facilities such as local newsagents, post offices, public houses and local farm produce is specifically recognised in the Rural Areas section of the PSJCS.

The existing rights of way shall continue to be in place. Any development on or near public rights of way will be expected to either relocate or retain existing rights of way. More information on footpaths within the SUE's will be provided when detailed masterplans are drawn up.

The PSJCS is in accordance with PPG17, as outlined in Appendix 1. Paragraph 7.35 outlines that *“each of the three Borough and District Councils in West Northamptonshire have produced Open Space, Sport and Recreational studies which are compliant with PPG17”*. These studies also *“provide detailed background information and recommendations for local standards of provision. These standards should be incorporated into all new development”*, which will ensure that the quality is also considered when determining recreation facility provision.

Policy INF1 outlines that *“New Development will be supported by, and provide good access to, infrastructure, including physical, green and social elements”*. Therefore all new development will provide good access to a range of new and existing infrastructure which will ensure multi-functional use and benefit.

INF1 also outlines how developers will only be expected to provide new facilities where the development generates the need. INF1 states that *“Where development generates a need for new infrastructure developers will need to demonstrate that adequate capacity exists, or that provision will be made, to meet the necessary requirements arising from that development within an appropriate timescale”*.

The IDP identifies requirements, costs and funding streams and gaps. It is not the responsibility of new development to address any existing deficiencies in health and leisure provision.

Policy RC2 outlines that the *“Loss of existing built sport facilities and areas of open space will be resisted unless it can be demonstrated that there is evidence that improvements can be made through the provision of a replacement facility or equal or better quality”*. Therefore it has been made clear in this policy that the relocation of facilities is acceptable provided that it brings an improvement to the quality of provision.

For each SUE an integrated transport network is proposed which supports the promoting of walking and cycling. The majority of SUE's will also provide strong links to the town centre which will provide the opportunity of more people accessing town centres by walking and cycling.

It has not been outlined what should be done early to gain the public's confidence. The IDP will set out when the relevant infrastructure will be delivered. The Open Space, Sport and Recreation studies also set out the standards that are sought by the relevant authorities.

Proposals to upgrade Danes Camp Leisure Centre and the development of the Bell Plantation for football and other facilities are detailed matters beyond the scope of the Core Strategy. The new development could contribute to these facilities where this is justified.

Collingtree Park Golf Course will be retained as discussed in the pretext of the Northampton South SUE. Paragraph 12.38 states that *"The Allocated site includes the existing Collingtree Park Golf Club which will be reconfigured and retained as part of the proposal"*.

The JCS does not include specific reference to Natural England's access to natural green space and the Woodland Trust access standards. These have been considered but the open space standards are based on up to date local studies rather than generic national standards.

The scale of development proposed in the PSJCS is much reduced and as such the requirements relating to new health provision are reduced. The IDP identifies improvements to health provision where these are required and will secure developer funding.

It has not been specified as to why this policy should include access to wild and rural areas. However, Policy BN1 outlines that new green infrastructure will *"Be designed to the highest quality in terms of appearance, access provision and wildlife provision"*. This will therefore improve access to new Green Infrastructure.

Recommended Action

The policy approach in relation to Health and Wellbeing and Leisure, Sport and Recreation is covered in a number of policies and sections within the PSJCS as outlined in the Joint Planning Unit's response above. This approach reflects the responses received and it is recommended that it be confirmed.

Question 50

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

Summary of Representations

Total	Support	Object	Gen. Comments
3062	71	2959	32

Summary of issues raised by objectors

- The proposed phasing is vague, presumptive and dependant on the availability of site and the building of essential infrastructure. More evidence base is required.
- Provision of and funding for infrastructure must come first before development timescales are decided. With work still ongoing the infrastructure timing is indicative, highly subjective and building timescales too optimistic and the economic condition suggests that they should be rolled back.
- The phasing excludes commercial uses, flood risk assessment, job provision and makes no reference to Green Infrastructure (GI) or enhancing biodiversity
- Should be more explicit with regards to achieving an integrated approach to sustainable development and communities and also provide indicative dates, dependencies and key triggers.
- Proposing more growth towards Northampton North instead of Northampton South East is unrealistic.
- Priority should be given to the regeneration of failing/deprived areas ahead of developing other areas, the use of all brownfield sites and the requirement for housing growth is overstated giving the large numbers of empty homes and sites in the north of England where the jobs are needed
- Concerned that development of Arm Farm could be brought forward without major infrastructure investment or reliance upon public funding and too many developments and individual sites whose credentials have not been closely scrutinised before finalising the phasing will commence at the same time thereby placing unacceptable strain on the existing infrastructure.
- Significant employment growth at Silverstone should be phased within the first 5 years and Avon / Nunn Mills sites should be incorporated into the first/second phase of plan.
- Implement the A5 relief road as early as possible to facilitate planned growth in Daventry and increase development in Towcester South to ensure adequate critical mass to secure the necessary infrastructure.
- Secure infrastructure and employment ahead of housing development.
- Concerned that services such as hospitals, doctor's surgeries, schools and local transport will be overloaded.
- Concerned that presumptions and the number of development areas could potentially change.
- Redevelopment of the Grosvenor Centre is unlikely to be completed before 2016. There is a need for contingency in the event the Grosvenor redevelopment is not forthcoming.

- Redevelopment of the town centre should not be given preference over other development
- Releasing Wootton southern development area in the short term would represent a sustainable development option requiring minimal major infrastructure.
- Employment and housing delivery must proceed at least at a ratio of 1.05 per dwelling.

Suggestion

It was suggested that phasing would be clearer if provided as a trajectory or timeline and contingency / action plan provided in the event of any of the growth options being undeliverable. It was suggested that sites should be prioritised to reduce pressure on infrastructure and reduce risk of vulnerability of incompleteness during future recessions.

Joint Planning Unit Response

The concept of phasing as set out in the JCS accords with Government advice in PPS1. It seeks to outline and justify the programme of actions; the timing of each development and funding regime. This is a programmed the release of development land in a managed and orderly manner.

The basis of the phasing is to maximise the use of existing facilities so that significant infrastructure investment can be rationalised, as far as possible, without compromising orderly growth of the area. The objective is to minimise wastage and set priorities for development that enable the attainment of economic growth and community well-being.

An overall phasing plan for future development is being prepared, as part of the JCS, to provide direction over long-term growth in a way that allows the delivery of infrastructure in a timely fashion. The misapprehension about the delivery of infrastructure is therefore misplaced. The Infrastructure Delivery Plan (IDP) now being prepared as part of the JCS exemplifies the commitment to adequate infrastructure provision and there is demonstrable evidence that the policy direction has emanated from sound evidence base.

All developments including commercial uses are part of the phasing programme and there is reasonable flexibility to enable changes to be made in terms of sequence of development. Where new evidence suggests otherwise, either through monitoring or other reliable information sources, the phasing programme could be changed to reflect this. Factors which affect phasing include adequacy of infrastructure or the availability of other services. The PSJCS will ensure that if essential infrastructure is not provided then development will not be permitted.

All sites are subject to Sustainability Appraisals (SA) and the Strategic Flood Risk Assessment (SFRA). These will be undertaken to ensure that new development proposals will not compromise the presumption against development in the flood plain.

The IDP is being prepared as part of the JCS links the delivery of infrastructure to the phasing of development. The overall approach is consistent with government advice and best practice and the policy direction is appropriate and logical.

The PSJCS seeks to ensure that development is phased alongside the provision of infrastructure. The phasing of housing development is covered by Policy S6 and the housing trajectory in Appendix 3. The IDP identifies how and when infrastructure will be delivered in accordance with the phasing of development.

Recommended Action

The policy approach in relation to the phasing of growth across West Northamptonshire is covered in a number of policies and sections within the PSJCS as outlined in the JPUs response above..

Question 51

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

Summary of Representations

Total	Support	Object	Gen. Comments
1366	73	1247	46

Summary of issues raised by objectors

- The policy approach is vague, lacks information and is uncertain that infrastructure will be delivered.
- Infrastructure is required to support communities and not 'support development' as the text suggests. Existing infrastructure is currently under great stress and insufficiently developed across the region. Bring existing infrastructure up to standard is required.
- Infrastructure is vital yet the Plan does not detail the location and type infrastructure required and no evidence to show that infrastructure delivery will precede housing development
- No control over the delivery of highways, hospitals, emergency services and utilities and no provision for, education health facilities, new hospital or medical centres
- Needs to be much stronger in its approach to infrastructure and no indication of how essential infrastructure will be funded and the robustness of the funding delivery plan is unconvincing
- Services and facilities to support this high level of growth are not identified in the Plan and there is over reliance on developer contributions.
- The growth proposals in the JCS will not be sustainable and tenable without Government funding.
- The JCS needs to provide its own mechanism to deliver infrastructure.
- Clear synergies between the West Northamptonshire Development Corporation's Infrastructure Delivery Plan and the JCS are required.
- Central Government should provide the funding to provide the necessary infrastructure to support the growth.
- The growth agenda must not be stifled by placing unreasonable cost upon developers.
- The JCS to make a distinction of where the provision is required on a site-by-site basis and developers should be made to contribute to existing amenities.
- There should be better and more engagement of infrastructure providers.
- The Plan must highlight the trigger points where developer funds will be released and should identify how increased contributions from land value uplift will be secured when market conditions improve.
- Development should make use of existing infrastructure and should not take the form of new compact developments.
- Concerned about the medium and long term approach to infrastructure funding which relies heavily on West Northamptonshire as a priority for Government and agency support
- A detailed implementation plan must accompany the submitted strategy and failure to do so may result in the strategy being found unsound.

- Flexibility is vital to ensuring deliverability of new development as well as the maximum viable contribution towards infrastructure costs and to meet the test of soundness
- Infrastructure led approach is key to guarantee to the Plan's success and funding for infrastructure must be ring fenced
- The Plan should include detail on how the development should be phased and the funding mechanisms that must be identified.
- The JCS should list the numbers and type of infrastructure already been provided in Towcester and Brackley.
- The JCS should specifically require ecological enhancement and contribution to the green infrastructure network to be an integral part of urban extensions.
- Concern that major infrastructure requirements (i.e. Flore-Weedon bypass) may take precedence over 'softer' infrastructure elements which are equally as important.
- Consideration must be given to the implications of the emerging Community Infrastructure Levy (CIL) and its relationship with development obligations.

Suggestion

It was suggested that consideration should be given to providing an entirely new town. This would allow infrastructure to be provided on site and provide an alternative focus and reduce the need to travel to Northampton.

Also, it was suggested that further guidance is required on the expected contributions from developers. This should state that developers do not have to contribute to pooled contributions when infrastructure / services are not relevant to a particular scheme. Mechanism should be included to enable developers to be reimbursed when they have funded the early delivery of infrastructure.

Joint Planning Unit Response

It is acknowledged that the aspirations and objectives of the JCS will be best realised if proper provision is made for meeting infrastructure requirements as an integral part of project delivery of new development. The importance of infrastructure is recognised in the Plan and its provision is considered to be a key driver for future growth and development. Policy advice set the parameters for its delivery is a key part of the JCS.

An Infrastructure Delivery Plan (IDP) is being prepared as part of the JCS. This informs the infrastructure requirements related to delivering the growth strategy identified in the Plan.

The Government encourages local planning authorities to introduce a levy or tariff that will help fund certain strategic infrastructure projects. The IDP being produced will set out the detail of developers' contributions expected from development and will allow the Councils to determine the level of contribution that is commensurate and necessary to enable each development in the plan to be implemented.

The approach being adopted is consistent with Government guidance. The government expectation is that the majority of items are expected to be funded through development, either by S106 agreement or by direct provision. Where development is not expected to fund an item, it is assumed that the organisation

providing the infrastructure will pay, unless there is evidence to the contrary. Where there is evidence of an alternative funding source e.g. some form of Government grant, this will be recorded.

The need for the appropriate range and scale of accessible supporting social, community, economic, environmental and physical infrastructure is crucial to delivering healthy and sustainable communities. There is concern over the ability of new developments, with appropriate associated infrastructure, assisting in providing balanced provision to overcome current deficiencies. Better management and making better use of existing provision will be essential in order to move towards adequate and balanced provision commensurate with a regenerated town centre.

The range of infrastructure required falls into three broad categories including transport and utilities, social and community infrastructure. On-going research and consultation on this plan helped to assess and establish current infrastructure capacity and identify initial infrastructure needs associated with further growth in terms of transport, utility services and waste, education, health and social care, housing and emergency services, community facilities, green infrastructure, culture leisure and recreation provision. The types of infrastructure mentioned are examples and not intended to be a definitive list.

The CIL came into force in April 2010. It allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area. The JCS approach conforms to the spirit of the legislation. Major new developments will be required to meet their own infrastructure needs, whether for transport, utilities, education, community, social, health or recreational infrastructure. Developers will also need to demonstrate the capacity of existing services to contribute to enabling the development of the site as part of the consideration of levels of new provision required. Such approach is supported by Government policy.

By making provision for growth in and around existing settlements the JCS will take advantage of existing infrastructure and allow new ones to be provided where necessary. There is no evidence to suggest that infrastructure cost for new towns offer better value for money. The central Government has, in the past, offered new towns as a solution to growth and this led to huge financial burden. The JCS will ensure judicious appropriation of any levy or contributions made.

The PSJCS includes a specific section and policies on Infrastructure and Delivery and policies setting out the approach to delivery (Policy INF1) and funding (Policy INF). Together with the IDP this provides much more information than was available at the time the EJCS was produced. The underlying ethos of the PSJCS is that if infrastructure is not delivered to allow a development to go ahead the development will not be permitted.

Recommended Action

That the policy approach in relation to Funding and Delivery as set out in Policies INF1 and INF2 of the PSJCS be confirmed.

Question 52 – Are there any other comments that you would like to make regarding the Emergent Joint Core Strategy.

Summary of Representations

Total	Support	Object	Gen. Comments
1585	N/A	N/A	1585

Summary of Matters Raised in Representations

The key issues raised in the objections and general comments are:

Consultation

- Insufficient time was given for the public to review and comment on the Emergent Joint Core Strategy (EJCS). This period should have been extended by two months as the Government requirement is for 12 weeks.
- The plan is written as if the reader has an assumed knowledge of planning.
- Exhibitions were too few and held during working hours when many people would not be able to attend.
- The questions are couched in such terms that responses to them are biased towards the affirmative. For example, "Do you support X"? People will tick either yes or no but qualify it in the comments section. However, it is likely that only the yes or no answers will be counted, rather than the comments.
- More inclusive consultation approach should have been adopted. For example, a simplified template summarising the main elements, with opportunities to indicate 'for' or 'against' would have enabled participation by the majority.
- It would have been easier to answer the questions about location if a summary description of each location, as it is now, was followed by a summary description of what it would be in the future.
- The on-line comments system could have been improved by ensuring that contributor's names were anonymous. This could lead to privacy issues.
- Presentations in all affected villages have not taken place. Where they did take place, they were often inadequate being simply a few sheets of paper on a wall and/or being unattended by a representative of the JPU.
- There is an over-reliance on web-based consultation. Many residents do not have Internet access and are therefore prejudiced by this approach.
- A Word version of the questionnaire should have been provided online for comment.
- Multiple consultations have been going on at the same time as the EJCS (e.g. Northampton CAAP). Makes it difficult for the public to tackle all of these.
- Consultation does not equate with scale of development proposed. For example, if one house were being constructed, letter would notify all neighbours. However, 18,000 homes are proposed and not one household received a notification letter.

Drafting

- More detailed/precise plans should be used rather than inaccurate blobs.

Principle of Growth

- Levels of growth proposed should accord with natural population increase only.
- Rather than saying no to the principle of growth, should be feasible to say; *"No for the moment, possibly yes in the future, if an economic upturn can reasonably be expected to provide the necessary jobs and mortgages to finance such massive growth"*.
- The need for this level of housing is no longer justified. The buy to let phenomenon has receded, as many are trying to sell their properties before values rise again. In view of the strong and extended housing boom, the bust will take longer to be eradicated from the system.
- Family units should be encouraged to stay together and not split up, thus reducing home ownership and giving a better quality of life.

Impact of Growth

- Development will be located on prime agricultural land at a time when the Government is advocating growing more food and bio-fuel crops in the UK due to growth in the third world and climate change.
- The plan will simply create dormitory areas for persons working in Milton Keynes and further afield.
- Scheme will give rise to high levels of light, noise and air pollution.

Alternatives

- All growth should be directed to a new town.
- Options proposed bear no resemblance to those proposed in the Issues and Options consultation. The proper course of action would have been to prepare a revised issues and options report before this preferred options report.
- Brownfield sites need to be developed before greenfield. Northampton Borough Council has indicated previously that up to 70% of new growth can be built on brown field sites. How come this is not being promoted actively in the EJCS? Furthermore, government policy actively promotes use of brownfield sites ahead of greenfield.
- Development should be focussed on renewal of the south & west of the County where many half finished developments with insufficient infrastructure are found.
- Incremental models of development are much more realistic, manageable and appropriate to suit the new and emerging economic circumstances, and indeed the likely scenario and local circumstances for years to come.
- Smaller developments integrated into existing villages and communities led to the regeneration of several areas in the 1960's, 1970's and 1980's, sustained existing schools, shops and village halls whilst also increasing the range of housing and maintaining balanced communities.
- Growth should be directed to areas with the ability to generate power, with more than average rainfall and existing infrastructure, rather than West Northants.

Evidence Base

- Evidence base should include a central place study to see where people work and shop.

- The research required to back up the statements in the plan is out-of-date and incomplete. As such, the options proposed are unjustified and the examination of alternatives hindered. As such, the plan is unjustified and ineffective and therefore fails to meet the tests of soundness in PPS12: Local Spatial Planning.
- In light of the current recession, combined with the cost of food, the Government has issued new directives on food production in the UK. These strategies are newer than the outdated mandates of the JPU.
- A large part of the EJCS is based on the dated Rooker Report, written seven years ago. This is hardly tackling the current issues of housing and infrastructure within Northamptonshire.
- The evidence base was produced during a period of economic growth. It needs to be revised to reflect the effect of the present recession.
- No reference is made to the Daventry Environmental Sensitivity and Green Infrastructure Study which was included in the Daventry Infrastructure Strategy.
- No evidence of the levels of infrastructure needed has been put forward. This infrastructure also needs to be in place before any new development is built.
- No SHLAA or Urban Capacity Study has been produced to support the *EJCS*.
- The JCS should consider the implications for the area of the anticipated opening of High Speed 2, between London and Birmingham.

Legal/Policy Context

- The EJCS is not aligned with the RSS and should not be worked on until the review of the RSS is complete. In particular, housing figures beyond 2026 should be removed from the EJCS, as these are most likely to change.
- The EJCS should be supported by strategies already in place such as the Brackley Masterplan.
- Growth beyond 2026 prejudices the outcome of the RSS. Option 2 of RSS options specifies growth of the urban area of Northampton. This is identical to the option put forward for Northampton in the EJCS. As such, the EJCS pre-empted consultation on RSS and pays little regard to public opinion.
- The EJCS ignores the designated boundary constraints established for the West Northamptonshire Development Corporation (WNDC). This goes beyond its mandate and is therefore unlawful.
- The PSJCS needs to show how it has taken account of planned growth in adjacent areas and the wider sub-regional and regional context.
- More reference is needed throughout the document setting out how it meets PPS1 and PPS12.
- Plan is deficient as it cannot meet the criteria for soundness set out in PPS12.

Partnership Working / Governance

- The partnership is too narrow. There should be involvement of non-governmental, non-political people to represent grass roots opinion.

General Comments and Omissions

- The future of the Flore-Weedon bypass has not been mentioned.
- No specific mention is made of "gateways" into Northampton.
- Waste disposal has not been mentioned.

- JCS needs a policy specific to telecoms infrastructure. Telecoms play a vital role in both economic & social fabric of communities. This is recognised by Planning Policy Guidance 8: Telecommunications (PPG8) which outlines that criteria based policies should be used.
- There is no policy in the JCS dealing with the development needs of Northampton's Central Area.
- What happened to the Council's infill only policy?
- A commercial reality check is needed for all parts of the plan i.e. "what is it for? When should it be done? Who wants it and where is the money coming from? Is it efficient? Is it green? How will it pay for itself? Is it sustainable?"
- North Northamptonshire JPU has rejected "coalescence". Why is this being promoted here?
- Further clarification of environmental matters throughout the JCS should be encouraged, especially with regards to what would be achieved through climate change mitigation measures.
- If this plan is about London overspill, then the results of the equally ill-conceived eastern part of Northampton and its attendant issues should be examined.
- Northampton has already grown by 89% whereas the national average is 11%.
- Plan does not address fundamental issues facing the area, including climate change, flood & water management, sustaining quality of life, traffic congestion, health and lifestyle, food supply and developing the distinctiveness of the area.
- How will this housing and associated infrastructure be funded? The Government does not have the money and previous experience indicates that developers will find a way not to pay.
- No mention has been made of faith groups, churches etc which contribute significantly to a sense of community.
- Strategy does not deal with needs of retired population that is set to increase.
- It is considered a conflict of interest that three Councillors who are on the Joint Strategic Planning Committee are also on the West Northamptonshire Development Corporation Committee.
- It is suspected that people in the committees that will decide the plan have a commercial interest in the plans success. All committee members should therefore declare their interests.
- Effects on neighbouring regions have been ignored. In places such as Birmingham and Coventry, there is a crying need for new housing, with huge areas of brownfield land available. Concentration of scarce resources in Northants will reduce availability elsewhere.
- There is no monitoring framework set out anywhere in the EJCS.
- Form and location of development should recognise the zones of influence from competing urban centres (i.e. Milton Keynes and Bedford) and seek to minimise potential out-commuting;.
- Overall, the document needs to explain why Northampton seeks city status and how this will be achieved, preferably through objectives.
- Northampton came second to bottom in performance table for local councils and its budget is likely to be cut over the next few years. As such, it shouldn't be allowed to increase its area.
- No provision is made anywhere in the plan for crime prevention.

Joint Planning Unit Response

Consultation

The EJCS was not a statutory stage and as such there is no statutory consultation period for this consultation. The consultation period was extended by two weeks to give sufficient time for members of the public the opportunity to comment on the EJCS.

The plan has not been written as if the reader has an assumed knowledge of planning. It has been prepared in a way to make it easily understandable to members of the public and is set out in a neat and concise manner.

Although most of the exhibitions were conducted during working hours, most of the exhibitions finished after working hours i.e. after 5pm. An exhibition was also held in Northampton Market Square on Saturday 15th August 2009, which also gave working people the opportunity to view the plan outside of working hours. A total of 18 exhibitions were held during the plan period over seventeen day period. Therefore the statement that there were too few exhibitions is unfounded.

As part of the Government regulations it is the Joint Strategic Planning Committee's obligation to comment on the key issues raised during the EJCS consultation stage. This analysis of representations is the document which responds to the comments. In addition, this section (any other comments) provides the opportunity for people to comment in detail on a particular aspect of the JCS.

The questionnaire provides a 'for or against' type of response through a 'yes or 'no' response. No evidence has been provided as to why a more inclusive consultation response should have been adopted. A number of workshops and exhibitions were held which gave the opportunity for local residents to discuss any issues or questions they had with members of staff.

A summary of each settlement was provided by the EJCS, which was followed by the 'Vision for West Northamptonshire', which sets out the vision for each town in 2026. The opportunity to comment on this vision is given in Question 1.

Registration was required to ensure the integrity of the system and to prevent inappropriate comments from being published. All personal information was kept confidential and was not published alongside the publication of the representation.

It would not have been possible to hold an exhibition in each local village over the consultation period. In addition, one has to take into account the finite resources the JPU has in holding exhibitions. Detailed information was also available from other sources, such as on the JPU's website and also the JPU itself.

The consultation period was advertised in the local media to inform residents. A number of exhibitions were also held which gave residents the opportunity to study the EJCS in detail. Response forms were available on request both at these exhibitions and via telephoning the JPU. Members of the public could also discuss the EJCS with JPU staff at the staffed exhibitions.

It is correct that due to an error a 'word' version of the questionnaire was not provided at the commencement of the consultation period. A 'word questionnaire' was however provided later on in the consultation period and the consultation period was extended accordingly.

The Northampton Central Area Action Plan (NCAAP) and JCS need to have the same timetable in order to be in greater conformity and also lead to a quicker adoption of the Local Development Framework (LDF).

One has to take into account the finite resources that the JPU has. To send a letter to every household affected by the proposed growth in housing would cost thousands of pounds and take up a significant amount of the JPU's time. The JPU informed the public through other methods, for example through advertisements in the newspaper, leaflet distribution e.t.c.

Drafting

More detailed and precise plans are prepared at later stages of the JCS when the preferred locations have been defined after receiving consultation responses during earlier consultation stages. The representation of the proposed areas of growth was not intended to be precise and through the consultation responses received during the EJCS consultation process the JPU will be able to provide more detail and precise plans of the proposed SUE's.

Principle of Growth

The levels of growth now proposed in the PSJCS are consistent with natural population growth.

The housing trajectory for West Northamptonshire has taken into account the potential economic upturn in the future.

The amount of housing proposed over the plan period has been revised downward in light of the recent recession. The EJCS set a target of 62,125 homes over the plan period, whereas the target contained within the PSJCS is 50,153.

The JCS cannot outline in detail the specific types of housing should be provided on each site, however Policy H5 of the PSJCS seeks to ensure that *'new housing will provide a mix of house types, sizes and tenures to cater for different accommodation needs.'* Policy H5 (Sustainable Homes) also outlines that *"all residential development must be designed to provide accommodation that meets the requirements of the Lifetime Homes standard"*, which will help give residents of these new homes a better quality of life.

Impact of Growth

Not all of the development can be accommodated on brownfield land and therefore some greenfield land development is needed. However, Policy S1 outlines that *"Priority will be given to making use of previously developed land and vacant and under-used buildings in urban or other sustainable locations"*.

The claim that the proposals will create dormitory areas for people working in Milton Keynes was principally directed at the Northampton South East SUE which is not included in the PSJCS. All of the SUE's propose local employment opportunities which will encourage future residents of the SUE's to work in the local area. In addition, all of the SUE's will provide integrated transport networks which again will encourage people to work in the local area. Finally, the distribution of development also outlines that new development will be concentrated primarily in and adjoin the Principal Urban Area of Northampton. This again will encourage people to work in the local area.

Policy BN9 deals with Planning for Pollution and states that *"Development that would result in a deterioration of environmental quality, either individually or cumulatively, will not be permitted"*. Therefore the SUE's will not lead to high levels of pollution.

Alternatives

The creation of a new town is essentially Option A of the EJCS which was rejected on the grounds that *"incremental development is more difficult to serve with the range of community facilities needed to support the increase in population. In addition, spreading the development around the edges of the urban areas would increase the load to the current road and utilities infrastructure, without bringing forward the economies of scale that would make the provision of further infrastructure cost effective and therefore deliverable"*.

This is a less sustainable option when compared to the SUE's. Firstly, it is likely that more Greenfield land would be taken up by a new town compared to a Sustainable Urban Extension. In addition, more car journeys will be made from this new town compared to SUE's. New infrastructure would also be built from scratch at these new towns, compared to either improving or extending existing infrastructure at the SUE's

A revised Regulation 25 consultation period was prepared before the EJCS. This was available for all members of the public to comment on and was available on the JPU's website.

The use of brownfield land is encouraged in the PSJCS. Policy S1 states that *"Priority will be given to the reuse of suitable previously developed land and buildings within the urban areas"*. However, not all of this growth can be built on brownfield land; therefore some development will occur on greenfield land.

Policy S1 of the PSJCS has set a target of 30% of additional dwellings to be built on previously developed land or through conversions, which is based on a realistic assessment of the brownfield sites that are available.

A precise location has not been specified as to where these, 'half completed' developments are. Two growth options are proposed to the south of Northampton as well as one to the south of Towcester.

Development within the rural areas will be guided by a rural settlement hierarchy (Policy R1). This *"will enable small scale housing and employment where this meets*

local needs and/ or supports local services and supports the retention and provision of local services and facilities in rural communities”.

West Northamptonshire has been allocated a set housing target within the East Midlands RSS. Although the housing target has been reduced for West Northamptonshire in light of the recent recession, approximately 50,000 homes need to be accommodated in the area. Some of this housing will be accommodated at SUE's, which build on existing infrastructure and have been determined to be the most sustainable locations for growth.

In addition, all new developments will have to follow the Sustainable Development Principles outlined in Policy S10, which includes “Generating a minimum of 10% of its energy needs from decentralised and renewable or low carbon sources”.

Evidence Base

A SHLAA was produced in November 2009 which is currently in the process of being updated. Urban Capacity studies have been produced for Northampton, Daventry, Towcester and Brackley.

The evidence base is updated on a regular basis and takes into consideration the present economic situation. The housing figures have also been revised downwards in the PSJCS to reflect the present economic situation.

The evidence does include an analysis of where people work and shop. The West Northamptonshire Employment Land Study (WNELS) which was published in August 2010 analyses people's work patterns. The West Northamptonshire Retail Study also highlights residents shopping patterns. Both of these documents are currently being updated in light of the reduced housing numbers.

The evidence base has since been updated since the EJCS. An updated SHLAA was published in November 2009, with an updated version due to be published in early 2011. An updated employment land study was also published in August 2010, whilst a new retail study is due to be published in early 2011. Therefore the PSJCS will be based on a sound and up to date evidence base. The JCS is based on a sound and robust evidence base that is updated on a frequent basis. Although agricultural land classification is a material consideration when determining a site allocation, it is not a basis to refuse permission.

Reference has been made to the Daventry Infrastructure Study in paragraph 13.13 and the environmental and visual features that this study discussed, including the ironstone villages within the countryside surrounding the town.

The HS2 rail link has been discussed in the PSJCS (pg 127), as it proposed to pass through West Northamptonshire near Brackley. It has been highlighted where the Government's preferred route will be in location to Brackley. However, the PSJCS goes on to outline that the final route that HS2 will take has not yet been determined and is not likely to be determined until 2015, three years after the JCS has been adopted. Therefore the implications of High Speed 2 rail link cannot be fully

considered in this version of the JCS, but could be addressed in a future review of the JCS.

Legal/Policy Context

A review of RRS8 will no longer take place as it is the coalition Government's intention to abolish RSS through the localism bill. In addition, the PSJCS does not refer to housing figures beyond 2026. The majority of growth in West Northamptonshire will occur in Northampton, in line with the 'Distribution of Development' policy contained within Policy 3 of the RSS.

The PSJCS takes into account the Brackley Masterplan as well as other Masterplans that are already in preparation, such as the Towcester Masterplan for example. The PSJCS lists the key objectives discussed in the Brackley Masterplan, as well as the priorities for improvements to services and facilities that new development will be expected to contribute towards. These objectives have been taken into account when preparing the SUE's and the town centre proposals. For example, one of the key objectives of the Brackley Masterplan is improved pedestrian and cycle links between new development and the town centre. Policy B4 outlines that *"To support accessibility and sustainable transport within Brackley the Local Authorities will Support Improvements to the Cycling Network within and around the town"* and *"Promote walking and cycling within the town as an alternative to car journeys"*.

The West Northamptonshire Development Corporation (WNDC) boundary does not set out the area of the West Northamptonshire Joint Core Strategy. The boundary determines whether an application (above a defined size threshold) is to be determined by WNDC (when an application falls within this boundary) or by the relevant authority (an application outside the boundary). The boundary is not defined on planning policy grounds and as such the EJCS can go beyond the development boundary and is therefore not unlawful.

A number of Regional and Sub-Regional Plans have been taken into account when preparing the West Northamptonshire JCS, as highlighted in Appendix 1 of the PSJCS. This includes the Milton Keynes and South Midlands Sub-Regional Strategy and East Midlands Tourism Strategy for example.

Reference to how the JCS meets the criteria set out in PPS1 will be set out in the Sustainability Appraisal. Policy S10 also sets out the Sustainable Development Principles which has been prepared in conjunction with PPS1. Appendix 1 of the PSJCS also sets out what plans and other strategies have been taken into account when preparing the JCS. This includes PPS 1 and 12.

No evidence has been provided as to how the plan does not meet the criteria of soundness set out in PPS12. Once pre-submission consultation has finished on the JCS it will be independently examined by an Inspector who will check if the JCS is sound. Therefore the JCS needs to be as sound as possible at this stage. The document is based on a sound, robust and up to date evidence base. It has also been prepared in accordance with PPS 12, which sets out the criteria for soundness.

Partnership Working / Governance

The views of non-governmental, non-political people are taken into account when preparing the Joint Core Strategy. Briefing sessions were held before the general consultation process with various community groups to gauge their opinion of the EJCS and forthcoming PSJCS.

General Comments

The future of the Flore-Weedon Bypass is highlighted in the PSJCS, particularly in Policy D5.

It is the purpose of Northamptonshire County Council's Waste and Minerals Framework to detail with waste disposal, not the West Northamptonshire JCS.

Policies N1 and N2 of the PSJCS detail the regeneration of Northampton Town Centre. It is the purpose of the Northampton Central Area Action Plan (NCAAP) to deal with the development needs of Northampton's Central Area. This is specified in the PSJCS.

Evidence of the levels of infrastructure has been highlighted in the PSJCS. More information on the infrastructure investment in West Northamptonshire will be provided in the IDP.

Some references are made to a gateway into Northampton in the PSJCS. Policy E3 outlines that the Technology Realm at the Northampton North SUE will provide "*High Quality and Innovative design and landscaping including a gateway feature on the A43 frontage*". Development at Castle Railway Station will also "*create an iconic new gateway to Northampton providing better facilities, capacity and service*".

Telecoms are a very specific policy for the JCS to deal with. PPG8 was adopted in 1992 and as such does not make reference to Core Strategies. Although the JCS does not directly deal with telecommunications development, Policy C1 outlines that "*Information Communication Networks, such as Superfast Broadband, will be supported across the whole of West Northamptonshire to reduce the need to travel*". Therefore the general principle of communication networks is supported in the JCS.

In addition, other policies, such as INF1 (Approach to Infrastructure Delivery) and some of the environmental policies could be taken into consideration when determining a telecommunications application.

There is not enough infill land to accommodate all of the growth proposed in the JCS. However, it is expected that 30% of all new residential development and conversion will occur on previously developed land, as specified in Policy S1.

The plan is supported by a Viability Assessment as well as the IDP which sets out how the development will be funded. A SA has also been undertaken for each version of the JCS to ensure that it is sustainable.

Climate change is discussed on a frequent basis throughout the PSJCS. In addition, Policy S10 discusses sustainable development principles that all new development is expected to achieve. This includes making use of sustainably sourced materials and maximising water efficiency for example.

This plan is not about London overspill. It focuses on the issues that are facing West Northamptonshire. No evidence has also been provided as to how the eastern part of Northampton has been 'ill-conceived'. In addition, Policy N11 discusses the regeneration of wards within Northampton East.

There is no evidence to support the claim that Northampton has grown by 89% over the plan period. It is also not specified as to what time period this growth covers. This is no reason as to prevent further growth of Northampton occurring.

The plan addresses the fundamental issues facing the area. All of the proposed SUE's are expected to assess flood risk on site, as well as providing an integrated transport network focusing on sustainable transport modes, including walking and cycling.

The IDP sets out the approximate cost of the development, as well as who shall fund the relevant infrastructure project. Policy INF2 also sets out the required contribution to infrastructure development and states that, "*Where identified infrastructure is required provision will be achieved through contributions towards infrastructure from all residential and commercial development*".

References are made to places of worship in the JCS and the value they have within communities. It is recognised in paragraph 11.3 that community or social Infrastructure provides the, "*essential support for communities to function effectively. It is wide ranging including all types of education, healthcare and cultural facilities such as places of worship, community centres, village halls, play facilities e.t.c.*".

It is recognised in the PSJCS through population projections that the proportion of elderly people within the West Northamptonshire population. In addition, the Spatial Strategy for Brackley (Policy B1) includes the provision of a new 60 bed unit for elderly care.

Any Councillor who may have an interest in the JCS outside of their role as a committee member has to declare their interest and abstains from taking part in any discussions associated with that committee item. No evidence has been provided to support the claim that members of the various committees have a commercial interest in the JCS's success.

In preparing the PSJCS consideration has been given to West Northamptonshire's relationship to surrounding areas. Other places such as Birmingham and Coventry are making provision to meet housing requirements. The level of growth now proposed in the PSJCS is consistent with the natural growth of the existing population.

A monitoring framework has been prepared for inclusion in the PSJCS.

The JCS does recognise the zones of influence of competing urban centres such as Milton Keynes and Bedford, such as when discussing transport links and connections between Northampton and these towns. The PSJCS discusses on numerous occasions that it seeks to minimise out-commuting to surrounding centres. For example, paragraph 6.4 states that, *“creating more self contained communities, both rural and urban, with the right mix of housing and employment for example, is vital in order to discourage out-commuting”*.

The PSJCS no longer refers to City status for Northampton within the vision, but would not preclude this if such a proposal were supported by Northampton Borough Council (NBC). The performance of NBC in league tables is not a relevant planning consideration for the JCS.

Crime prevention is referred to on numerous occasions within the PSJCS. In community regeneration areas in Northampton for example, it will be expected that a strategy for these areas will, *“Create Safe and Sustainable Environments by designing out opportunities for crime and anti-social behaviour”*. Reference is also made to a number of sustainable documents. The PSJCS outlines that, *“In order to maximise community safety there will also be the requirement to seek to adhere to the guidelines set out in the ‘Safer Places’ and ‘Secured by Design’ documents as well as the Planning out Crime in Northamptonshire Supplementary Planning Guidance”*.

Recommended Action

No further changes are required to the PSJCS.

Question 53

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

Summary of Representations

Total	Support	Object	Gen. Comments
825	391	31	403

Summary of issues raised by objectors

- Both options have merit good transport infrastructure. In particular, Northampton Option 2 (Northampton East) can be easily accessed from the A45 and A4500. Northampton Option 5 (South of M1 and South-West) is close to the M1, rail infrastructure and the canal, which provide good links to London.
- Growth should continue where logistics are already in place.
- Northampton Option 5 (South of M1 and South-West) seems workable.
- Although also somewhat removed from Northampton and therefore not having good linkages between the old and new communities, the Junction 16, M1 option has been chosen. However, this same rationale has been used to reject Northampton Option 5 (South of M1 and South-West).
- One of the reasons given for rejecting Northampton Option 5 (South of M1 and South-West) is that development beyond the M1 would not be consistent with the character of Northampton; this is a subjective statement that depends on the scale of development proposed and mitigation put in place.
- The Draft Sustainability Appraisal Report identifies Northampton North, Northampton West and Northampton South-East all as areas with a medium to high landscape and visual sensitivity. However, these are preferred options although effects on similar landscapes occur in Options 2 and 5.
- Has a pure employment site, like that considered appropriate at Junction 16, M1 been considered for Northampton Option 5 (South of M1 and South-West)? If so, then the assessment for Northampton Option 5 (South of M1 and South-West) is inconsistent with that undertaken for Junction 16, M1.
- Supporting the rejection of these options implies support for those options considered appropriate.
- Northampton Option 5 (South of M1 and South-West) has been rejected for political reasons.
- The M1 is an artificial man-made barrier that could be overcome with an underpass. Accordingly, Northampton Option 5 (South of M1 and South-West) should not be rejected and development of Northampton Option 5 (South of M1 and South-West) would be easy to attach to Northampton and would provide the least disturbance to the villages.
- The reasons given for the rejection of Northampton Option 2 (Northampton East) and 5 are very brief and provide little explanation. As such, the consideration of alternatives has not been carried out appropriately, is therefore not justified and the plan fails to meet one of the soundness tests in Planning Policy Statement 12: Local Spatial Planning (PPS12).

- The Northampton Highgate site, which is located within the Northampton Option 5 (South of M1 and South-West) area, would include a new rail link between Northampton and Milton Keynes. This would deliver modal shift in a way that no other site can and is, therefore, most sustainable when mix of uses is also considered. This rail link would also mean some reliance on Northampton and Milton Keynes for the provision of essential goods and services, thereby meaning these areas will not become towns in their own right. It is noted that Network Rail conditionally supports this new link and station.
- Although located beyond the M1, good linkages between Northampton Option 5 (South of M1 and South-West) and Northampton can still be provided.
- Both rejected options would provide large population bases that could work within Northampton. As such, they will contribute to its regeneration.
- These options bear no resemblance to those considered in 2007's issues and options.
- The argument that the M1 provides a strong physical barrier is laughable. The A45 is no less a barrier yet development beyond it is being considered.
- Housing in these areas would destroy precious green belt.
- Northampton Option 5 (South of M1 and South-West) should be re-considered in light of the new high-speed rail link.
- The reasons given for rejecting Northampton Option 2 (Northampton East) are interesting in that birds are considered more than people.
- Land between the M1/A508 branch line should be considered.
- The reasons given for rejecting these options apply equally to the preferred options for Northampton.

Joint Planning Unit Response

Northampton Option 2 (Northampton East) evolved from the Northampton Longer Term Growth Options (the EDAW Study) and Issues and Options Consultation. It is located directly to the east of Northampton and an area known as the Eastern District. This area falls primarily in the Borough of Wellingborough. There is no provision within the RSS to provide for the development needs of West Northamptonshire outside of the administrative area of the three Councils for whom the Plan is being prepared.

In terms of environmental sensitivity there are a variety of nature conservation designations including geological sites and Local Nature Reserves (primarily grasslands). The area has a high landscape sensitivity including the prominent Ecton Ridge. Majority of medium sensitivity sites are small pockets of deciduous woodland especially those that occur around Ecton.

There is archaeological sensitivity associated with extensive areas of pre-historic and Romano-British occupation in the vicinity of Ecton Ridge. There is evidence of Saxon and medieval occupation in and surrounding Ecton village.

The area forms an attractive rural landscape and is important for the separation between Northampton and smaller settlements in the neighbouring Borough of Wellingborough. There are extensive areas of land safeguarded for Sand and Gravel Extraction

This area performs poorly in terms of the EJCS Vision and Objectives and the Northampton Landscape Sensitivity and Green Infrastructure Study Living Landscapes 2009 NLSGI Study and Sustainability Appraisals (SA).

Northampton Option 5 (South of M1 and South-West) option evolved from Northampton Longer Term Growth Options (the EDAW Study) and Issues and Options Consultation. It is located entirely to the south of the M1. It encompasses the villages of Blisworth, Gayton, Milton Malsor and Rothersthorpe. There are no SSSIs in the study area although Bugbrooke SSSI is just outside the area. There is a Local Nature Reserve at Storton Pits and Local and Potential Wildlife Sites. Towards Kislingbury there are extensive areas of grassland adjacent to the River Nene considered to be of medium sensitivity.

The setting of this part of Northampton is less distinctive than other areas but it nevertheless contributes to the character and setting of the higher parts of south-west Northampton. Beyond the ridge containing the villages of Blisworth and Gayton, the landscape is considered distant from Northampton and there is little visual connection with the town.

Watercourses pass to the west of Rothersthorpe and to the west of Milton Malsor. They both have Flood Zone 3 designations along their lengths. There is an extensive area of Safeguarded sites for Gravel and Sand Extraction.

In relation to archaeology there are known assets in the area. There are Scheduled Monuments (SMs) along the canal as well as Ridge and Furrow.

The M1 provides a strong physical barrier of separation between this area and the town which places the inclusion of this area as an option for development against the vision of a compact urban form.

In terms of the vision and objectives of the JCS this area performed poorly compared with other options and this was very much concerned with its location beyond the existing communities of Northampton. The original EDAW study which addressed the general issue of an SUE in this area stated: - *'the considerable barrier of the M1 makes it difficult to imagine the establishment of new communities south of the M1 as settlements contiguous with Northampton, and additionally there would be challenges in terms of place making and environmental quality. The community would also be relatively remote from Northampton town centre and there may be limited benefits for community provision and social cohesion.'*

Although a bridging solution (separate vehicular and pedestrian bridges) has been suggested or junction improvement in order to allow access to and from Northampton, the actual and perceptual barrier may well act as a deterrent to using the town, and capturing the financial benefits of growth. All other SUE options are essentially 'contiguous' with the existing urban area of Northampton. By not displaying this essential pre-requisite required through the policies of the RSS in respect of the growth of Northampton it performs poorly as a location for a potential SUE and has therefore been rejected.

Recommended Action

No change to the PSJCS.

Question 54

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

Summary of Representations

Total	Support	Object	Gen. Comments
816	370	19	427

Summary of issues raised by objectors

- The Daventry North West site is a block of land that has already accommodated a large level of development and the reasons given to reject this site are politically motivated and are equally applicable to Daventry North Site.
- The reasons for rejecting the Daventry South Option could equally be applied to the Daventry North Site.
- The Daventry East option will not have a significant impact on Borough Hill, a well designed scheme can incorporate it without impacting its character, the option is not remote from the town and can be linked through high quality transport link, it is the best option and could accommodate more development because it is close to the M1, A5 and rail route to London. It has been suggested that the Daventry East Option is similar to the Daventry North East and South East that have been supported.
- The Daventry South option will generate traffic flows away from the town along A45; it is unsustainable and will increase congestion along A45/A5 junction.
- The reasons given for rejecting the Daventry West option could easily also apply to the South East option that has been supported.
- The reasons are weak and need to be strengthened, particularly with respect to infrastructure.
- The JCS omits to consider the potential for delivering housing in the existing urban areas.

Joint Planning Unit Response

Urban capacity within the major urban areas of Northampton, Daventry, Towcester and Brackley has been considered as an integral part of determining the extent of greenfield land required. The Strategic Housing Land Availability Assessment (SHLAA) is the evidence base that supports this assessment.

Daventry Option 1 (Daventry East) - Development to the east of Daventry will impact on the setting of Borough Hill Scheduled Monument (SM), which is a large and prominent feature within the landscape. The area to the east of Borough Hill also lacks good connectivity with the town and hence would not enhance or facilitate the regeneration of the town centre. Borough Hill acts as both a physical and psychological barrier. The remote location of this area would make it difficult to successfully integrate any new residential development in to the existing community.

Daventry Option 2 (Daventry West) - The Option 2 area is physically separated from existing residential by the presence of a large industrial estate on the urban edge which will challenge the objective of creating high quality housing for future residents where they can feel a part of an existing community rather than a remote and disassociated estate. In addition above there are topography challenges, poor opportunity for sustainable links to the town centre and reduced sustainable access to utilities infrastructure than in other options. There areas of known archaeology and biodiversity resources in the form of potential wildlife sites and linear woodland. There is presently no developer interest in bringing forward a large site within area 2.

Daventry Option 3 (Daventry North West) - The area is poorly located in respect of sustainable access options to the town centre and less well located as regards sustainable connection to water and utilities infrastructure. As with the Option 2 Area, the presence of a large industrial estate on the urban edge will challenge the objective of creating high quality housing for future residents where they can feel a part of an existing community rather than a remote and disassociated estate. No sites have been identified at present as available for development in this area.

Daventry Option 7 (Daventry South) - The A45 forms an effective physical barrier which disassociates this land from the urban area of Daventry and provides challenges for effective sustainable transport with the town centre. The land also has known archaeology and wildlife sites as well as challenging topography. It is less well located than other edge of urban areas for sustainable water and utilities infrastructure provision.

The view that the reasons for rejecting the Daventry West could also apply to the preferred option in the South East do not necessarily hold. This is because the physical characteristics of the two options differ and also the SE option has greater potential of being connected to the existing residential areas and town centre and promote sustainable modes of transport utilising the existing infrastructure.

Recommended Action

No change to the PSJCS.

Question 55 – Do you support the rejection of ‘Towcester Option 2 (Towcester West)’, ‘Towcester Option 3 (Towcester North-West)’, ‘Towcester Option 5 (Towcester Racecourse)’, ‘Towcester Option 6 (Towcester North)’, ‘Towcester Option 7 (Towcester to Silverstone Lung)’ and ‘Towcester Option 8 (East of Silverstone Lung)’?

Summary of Representations

Total	Support	Object	Gen. Comments
811	368	13	430

Summary of issues raised by objectors

- Support Option 8 in comparison to others. Option 8 could be included in the preferred option to make it bigger as there are no landscape, cultural or environmental objections here.

General Comments

- Option 3 – would be difficult to resist pressure to join Option 3 with Greens Norton;
- Towcester North has all the disadvantages listed but does have the advantage of good access to A43 and Northampton;
- Option 7 and 8 would have good access to A43, but would join Towcester to Silverstone. May be considered in the distant future;
- Any further extension might be done by extending Towcester South to join up with Paulerspury which could be served by bus to Milton Keynes;
- Reasons for rejecting Towcester Option 3 should include reference to significant archaeological remains; and
- The Towcester Masterplan needs to be taken into account.

Joint Planning Unit Response

There are environmental issues associated with Option 8. Part of the option does fall within the flood plain. The Lordsfields Farm Moated Site Scheduled Ancient Monument (SAM) and a Grade II* Listed Building are also on the site, as well as being subject to potential ground instability. These constraints add to the justification for rejecting this option in the EJCS.

Towcester North West (option 3) has now been rejected on the grounds of the flood plain and the A43/A5 forming a barrier to Towcester Town Centre. There are archaeological remains on site which would hinder development on this site. Reference could have been made to this in the rejected options section of the EJCS, but as the rejection of options is not being described in the PSJCS, no change is required to the PSJCS.

Although Towcester North (option 6) does have good access to the A43, the majority of other rejected options also have good access to this arterial route; therefore this is not a justifiable reason to consider this option further.

Option 8 would lead to the coalescence of Towcester and Silverstone which is not supported in the JCS.

The proposal to extend Towcester South to Paulerspury would lead to the coalescence of Paulerspury and Towcester which is not supported. This extension would also be further away from Towcester Town Centre.

The Towcester South option will provide an integrated transport network, whilst the Towcester Transport Strategy will support *“Enhanced Public Transport connections with Silverstone, Northampton and Milton Keynes”*.

The Towcester Masterplan has been taken into account when preparing each of the Sustainable Urban Extension proposals. In addition, reference is made to the Towcester Masterplan in the PSJCS, as well as the Masterplans' key objectives.

Recommended Action

No change to the Pre-Submission Joint Core Strategy.

Question 56 - Do you support the rejection of 'Brackley Option 1 (Brackley South)' and 'Brackley Option 2 (Brackley North West)'?

Summary of Representations

Total	Support	Object	Gen. Comments
808	361	19	428

Summary of issues raised by objectors

- This implies support for other options.
- Support Option 1, which is a sustainable location. A bridge could give access to the town and there would be good access to the A43/A422. The area of Evenley Park should be avoided.
- Option 2 should be preferred as all access routes could be on to the A422 and will not impact on existing narrow estate roads.
- Option 3 should be rejected because of poor access roads to and from the site.
- The reasoning for rejecting options is weak, i.e. 'will not enhance character' and 'won't foster regeneration of the town centre'.
- Disagree with the proposal to reject Option 2. The impacts on matters such as air quality, landscape and road access are no different to the preferred option of Option 3. A fuller report and assessment of options is required.

General Comments

- Option 1 could be looked at again in the future as it is within walking distance of the town centre and close to the Tesco supermarket.
- Insufficient information provided.
- Option 2 could provide an orbital road from the A422 to Halse Road and should be kept in reserve.
- These sites would have a greater impact on the historic environment, notably Evenley Hall and the setting of Steane Park.
- The rejection of Option 2 has not been fully justified. It could provide a contingency that meets the objectives of the JCS.

Joint Planning Unit Response

Brackley East and Brackley North SUE's have been carried forward into the PSJCS as these are the most sustainable and preferable options.

Brackley South is not in a sustainable location. The physical connectivity into Brackley is poor and would not, therefore, enable or support the delivery of co-ordinated transport improvements to the town centre with an emphasis on non-car modes. Evenley Park, even if this area was removed from the option, the development would still affect this asset due to the increase in traffic on the A43.

Brackley North West would lead to an increase in traffic on the A422 which would lead to congestion and a reduction in air quality. A major increase of traffic on the A422 would also increase the need for a bypass to Farthinghoe and improvements to the links between the villages on that route. This would require a greater take of Greenfield land and would prove a greater cost compared to other options.

The transport strategy for Brackley has determined that the existing roads can accommodate the level of growth proposed at Brackley North. In addition, the Brackley North development will also provide, *“an integrated transport network with sustainable transport modes including access to Brackley Business District”*.

The impacts are different for Brackley North and North West options. Brackley North is accessed via the A43, which is a dual carriageway, whereas Brackley North is accessed via the A422, which is only a single lane carriageway. Therefore the impact will be far greater on the A422, which would lead to a greater level of traffic on this road which in turn would lead to a reduction in air quality. It is highly likely that a new orbital route would have to be built as a result of Brackley North West, which would have a greater impact on the landscape compared to Brackley North.

Although Brackley South is located near the Tesco store, the negative impacts of Brackley South outweigh the benefits it could provide. This includes part of the site lying within a flood risk zone, the impact on landscape sensitivity, and the physical barrier of the A43/A422.

The rejection of Brackley North West has been fully justified in the EJCS. A number of reasons have been given as to why this option should be rejected, including an unacceptable increase in traffic and development requiring a construction of a new orbital route which would cost more money, lead to a greater amount of greenfield land being developed and a reduction in the air quality of the area.

Brackley South has been rejected due to the impact on Evenley Park. Although Steane Park is located some distance from the Brackley North West Option, this option has now been rejected; therefore there will be no impact on Steane Park.

More information on the Brackley East and Brackley North SUE's has been provided in the PSJCS.

Recommended Action

No change to the PSJCS.