

West Northamptonshire Joint Core Strategy Consultation

These are the most important of the 55 questions that need answers and commentary

1. Do you support the vision?

19. Do you consider the objectives to be specific to local circumstances?

These are the key issues and challenges forming the backdrop to the planning development facing West Northants over the next 20 years from our perspective

- Climate change with a whole range of new strategies and legislation relating to Food and Flood and Water Management
- Behavioural changes – linked to the above – required to make quality of life sustainable and deal effectively with the existing infrastructure deficit and issues around that required to support housing growth – congestion and car use, health and lifestyle issues, etc.
- Establishing distinctiveness and sustaining it

We don't feel that the Emergent Strategy has any credible means of dealing with these fundamental issues in relation to the scale of the development proposed and so cannot achieve the vision which could be the aspiration of any place and has nothing distinctive about it.

We don't have any confidence in the proposals for the provision of the infrastructure across such a wide range of existing settlements. The concentration of effort in focussing development in a single new town might provide a more realistic means of meeting the scale of housing development but again we have no confidence in the means of achieving the scale of infrastructural investment required to develop and sustain a new community on this scale per se in West Northamptonshire

Moreover, the current position is a hugely changing set of circumstances.

There is the present state of the economy and the adverse impacts on Northampton in particular e.g. the loss of jobs. The Strategy does not effectively deal with changes in circumstances such as a lower than estimated demand for housing in the area.

Then there are issues such as climate change and flooding, future Food Strategy, Flood and Waste Management Strategy and other national strategies in support of new models of sustainability. The Flood and Waste Management Strategy, for instance, will require a new way of working for all flood risk stakeholders in England and Wales. This will bring new

responsibilities and the need to develop a new paradigm for cooperative flood management

The Growth Agenda for housing and jobs is now both out of date, rendered so by the dislocation of new economic circumstances – of undoubted long term structural significance – and the urgent need to deal with climate change and the new forms of community modelling that this will involve. The Growth forecast is simply not being realised and appears grossly overstated.

We have never been convinced that trying to establish the volume of new housing and development in West Northamptonshire was sustainable and feel that is now fundamental to reconsider the whole Growth Area predictions, not least in the context of needing more urgently to address the regeneration needs of communities elsewhere in the country where the macro-economic impact of the present recession is affecting more severely than is the case in our county.

2. Do you support Objective 1?

To deliver the planned growth in West Northamptonshire as required through the East Midlands Regional Plan and the MKSM Sub Regional Strategy through the provision of managed growth and necessary infrastructure principally focused on Northampton, but also Daventry, Towcester and Brackley

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

The proposals are heavily out of alignment with area strategic planning. By itself for instance Northampton SE drives a coach and horses through a whole range of strategic framework documents that were predicated on the expansion of the town being inward, initially, on brown field land (e.g. MKSM sub regional strategy 'Countryside Character and Environment') and then on other sites that offered a genuine hope for a sustainable form of expansion that would encourage centripetal focus into the town not centrifugal tendency outwards

We do not feel that the submission of proposals has taken account of the neighbouring JPU to the N and E and the other area proposals in the MKSM Growth Area. The Issues and Options Proposal was inherently flawed here as any discussion about development to the North, West and South has to take account of the implications of the position of Northampton in relation to the wider Growth Area. Another area of huge unfitness for purpose with the new Strategy is the massive understatement of the consequence of the JPU now choosing to take the plan beyond 2026 resulting in another 12000 extra houses

From our viewpoint the strategic thrust of the future development of Northamptonshire should focus on the following. More detail on each of these points is given in our response below.

- The growth and regenerative renaissance in the main urban centres with a high emphasis on capitalising on the opportunities for enhancement of the public transport network as part of this process
- Focus on brown field land in the urban areas – high density - supplemented then, as next priority, by existing environmentally degraded major transport corridors – A45, A43 and M1
- Enabling and creating self supporting communities where facilities are available without using cars including local employment and/or work accessible by public transport. There should therefore be a strong focal emphasis on existing transport corridors. Ensuring sustainable patterns of transport and effective integration of new development with the road network are key issues

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Concentrate all development in the towns or direct some growth to the villages to sustain the rural way of life. We support the growth being directed to the towns of Northampton, Daventry and Towcester. In part this offers the best chance of delivering affordable housing and strategic infrastructure to support the shifts needed in transport and the economy.

The aim should be to create a new vibrant and rejuvenated character and feel to the towns. This will involve providing them with much more integrated and multi-use infrastructure (e.g. in terms of transport and community buildings), so increasing their self-sufficiency, ensuring housing and employment are closer together, reducing pressure on transport, and so on. If the development is not so concentrated, then the transport agenda will become even less manageable and the outcomes more paralysing and deleterious to quality of life and the chances of quality in any economic upturn.

We should consciously map out the villages and landscape of character – that has not already been compromised by development or the impact of neighbouring development – and preserve their quality and integrity in relation to their built heritage and landscape and countryside access. These are very important to the character of the county for inward enticement and appeal to effect new forms of inward investment of more quality business. These villages should be given the chance to contribute to determining for themselves degrees of restricted infill and the preservation of their own green infrastructure..

There perhaps needs to be some form of debate as to what ‘the rural way of life’ now is and what we are seeking to sustain. One fundamental element of this is to counter dormitory development and to seek to restrain the suburbanisation of village life. A strong division between town and country could well be intrinsic to this and a key strategic focus for the future. Further development in villages should only be permitted if it is appropriate in scale and does not intrude on the character and spirit of the individual villages.

There may be some scope for development linked to farm diversification and small rural shopping and craft developments for instance. This needs to be looked at on case by case basis with Parish Councils and local parish planning being given a strong say on what suits their communities and is acceptable.

4. Do you support Objective 3?

To support existing and new communities through the provision of education, health, community, leisure, cultural and social facilities, linking new and existing communities physically and socially

Consider alternative ways to prioritising infrastructure e.g. available funding, local needs or to fit with others’ strategies

It is important to recognise the importance of green and cultural infrastructure in helping to create an identity, sustain quality of life and address many of the deep rooted social problems that plague existing communities and help sustain fear of crime. There is an opportunity to go way beyond hard infrastructure through s.106 settlements and seek to create something much more imaginative and ambitious in our mapping out of the best management of the impacts of the new development. See also comments at WN4

How do we ensure that all necessary infrastructure is delivered and at the right time?

By setting a strong framework to influence development and interventionist, effectively project, management of the s.106 'developer contribution' process.

The developers must not be allowed to dominate and deter/deflect the strategic intentions of the JPU. This will require the sort of capacity and resources at the disposal of the Development Corporation and a preparedness to dictate to and be aggressive with the developers – effectively to 'project manage' and shape the development An active not passive role is needed.

It will also require changes in the whole nature of permitted development e.g. a new insistence on flexible multi-use buildings (efficient integration of uses), ensuring community needs are factored into development, focus on sustainability, and strenuous avoidance of unsupported infrastructure (the whole range of infrastructure, needed in an integrated form, so as to provide some guarantee of quality of life – transport, landscape and bio-diversity, utilities, green infrastructure, and social and cultural including some thought too to third sector involvement.

The Spatial Objectives are all interlinked, Addressing them requires a more sophisticated model that synthesises them; indeed a model that builds on the key themes of climate change (and sustainability) and the role and relationship of the towns.

The crucial point is creating a new model for economic prosperity that does not imperil transport, community and quality of life. This is the most fundamental challenge as it requires a more interventionist approach – without market intervention and restriction (shaping policy actively and assertively), none of the chronic problems and issues associated with development on the scale proposed will be managed and mastered

5. Do you support Objective4?

To direct retail development to the most appropriate locations that support regeneration of the town centres

How do we make WN an economic success without prejudicing its character?

What is its character? Is there a received view on the identity and character of the areas or parts of it? Is there a strategic wish to preserve it and/or let it

evolve? Arguably, much of the character has been compromised by past development anyway. Much of that development, in terms of business, has been anodyne and characterless, serving to create a sense of Anywheres-ville characterised by the absence of anything memorable and appealing from an architectural perspective.

Consequently, the answer to the question is perhaps to ensure that the business development that is permitted within the growth is carefully prescribed and managed and that quality architecture and design are essential elements of it. Where possible this might echo the local vernacular and/or make reference to the past architectural character of areas that have some sense of identified heritage but it should also be ambitious in seeking too to stamp a new and more forward looking confidence and character

How do we develop the WN economy? Should we specialise or not?

By shrewd and careful management of what is encouraged and permitted. Strong governance and management of the process of the planning and development process is essential to try and effect a step change in the economy away from distribution and flatted factories, this being the overwhelming image at present.

Forms of specialisation are recommended as they can help in shaping character and identity and have tended to be critical in the establishment of clusters elsewhere e.g. with high tech industries. Focusing on encouraging diversity and maybe looking specifically at enticing, for instance, cultural and creative industries is to be recommended. Ways of doing this effectively are touched on in other answers.

Marketing the place to entice this form of economic inward migration and establishment will need to draw on the promotion of the quality of the rural landscape, heritage and culture and there is an important issue here about preserving and enhancing the most important areas of quality landscape and built heritage so as to serve this end.

11. 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

By a risk aware and risk managed approach to flood risk built on the most up to date predictions of the impacts of Climate Change. The predictions and projections being made by the Government's Chief Scientist mean that areas to the south need to cause us all significantly to rethink. It is well known that current flood prevention in the county is inadequate and this does not take account of the changes needed to project for the impacts of global warming and climate change.

We are not confident that developer contributions are appropriate for funding the massive works to improve the problems with the current drainage system.

14. 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

This is a sound enough in principle as are the other objectives on first reading. However, in our view central to the development and regeneration of the town is the maximising of the use of brown field space and its internal regeneration within its existing boundaries. This offers a much greater chance of addressing fundamental future issues such as the many emerging facets of climate change, modal shift for transport and so creating a genuinely new sustainable urban model.

We commented in some detail in our Issues and Options consultation response on the need to maximise urban and town development. This should not be seen simply as a means of reducing the amount of land to accommodate the development and perhaps a means of lessening the impact on Greenfield development. It is too a means of seeking to create vibrant new urban space in the towns through this form of development, and affordable housing, often in high density. This, as in many other towns, could be intrinsic to the revitalisation and regeneration of the town space and benefit their economic growth by supporting inward investment and dynamism. There could be multiple regenerative impacts and opportunities for a really new sense of direction and character from doing this effectively. Ambitious design and architecture should be concomitant elements; as should use of art and culture in the offer.

We believe – as is admitted in the Strategy – that there are a number of areas in Northampton that are in need of regeneration. A new visionary and more ambitious approach to their regeneration – perhaps using EU funding and European successes in regenerative modelling – has not been assessed. If so, in our opinion, there is significant scope for increased capacity to a much more sustainable model that delivers integration for the town. The town needs to embrace the Sustainable Communities Act philosophy and not look simply to annex high value green belt to the SE. Presuming that Northampton can be regenerated simply by modest investment and/or outward extension is at best naïve, at worst ignorant of reality. The culture of the town is embedded in its history and psyche. It cannot be transformed by a planning process, particularly one so defective in its approach to infrastructure

The Northampton Longer Term Growth Options Study concluded that focus should be on existing urban areas and specifically mentioned upgrading the eastern district area. This has not been given the weighting and emphasis that is due.

Improving the overall performance of the town centre will require attracting people to what is on offer – by identifying, for instance, why people travel to Milton Keynes or Oxford and Cambridge by preference and trying to provide something that has equal allure. Kick starting such a change in behaviour and attitude might be most effectively done by a powerful investment in Culture in its widest government defined sense. Two other elements of importance are making access easy and positively discouraging out of town development and shopping or at least seeking to balance the quality of what is available in the towns with the out of town options.

However, the Strategy seems grossly to understate the scale of such a task to achieve the transformational picture painted by the vision. The comparative deficit and the competitive leadership of places such as Milton Keynes and Oxford can offer is so huge as to render transformation on the scale envisaged an enormous task. Simply stating an aspiration for a future City and desirable retail centre in the way envisioned seems somewhat fantasy. Such a change would require enormous investment including some demolition and rebuilding will be required in some places

16. 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 WN including links to the wider network

This is a huge challenge. One could make a colossal investment in new infrastructure – which is truly diversionary and offers acceptable and welcome alternatives – such as a tram system (but this seems very unlikely/impossible given the resourcing required and the fact that there is no will to do this). Then there us the option to create new and extended roads but although these may offer short term mitigation, they will soon become as paralysed as the existing road network without the achievement of concurrent behavioural change through education and peer influence.

Moreover, if we take the road suggestion in relation to Northampton SE as an example - which is not incidentally envisioned in the Local Transport Strategy – this would will cost a lot – possibly £100 – £200 m. We don't believe central government would sign up for a contribution of this order especially since the proposal does not even feature in the LTP. Besides this road proposal is entirely misconceived. Its creation to the road network would simply magnify the centrifugal tendency for outward commuting from Northampton and the E/NE of the county to the south – Milton Keynes and beyond - and worsen the existing chronic congestion issues. Secondly we don't feel it is viable given the massive cost involved in bridging the river, crossing a wide flood plain and ascending the hill in this area, and the existing flood risks and enhanced risks that would ensure from a new road and such massive new urban

development. There is clear evidence of the high flooding risk from NRA publications

Chances of effective 'modal shift' are slim. It is only having the most marginal effect in other parts of the UK. So much of our infrastructure, economy and cultural outlook has been built around the car that gigantic change in behaviour and expectation is required to do things differently. The only hope of effecting some modest improvement is by concentrating the development in the areas we have suggested below, seeking to use the minor transport network and creating more of the same to make multi-user routes genuinely available to serve new and existing communities, and to support this with a massive campaign of a cross cutting nature that advertise the impacts of climate change and impending health problems as key drivers for action and change. This should also involve employers who should be incentivised/forced to make efforts to 'improve their game' – both in relation to climate change and health – as an extension to their Corporate Social Responsibility.

There is a possibility at least to make some of this pioneering and use it even as a means of creating identity and character to the place. Park and Ride and bus options also have a place but only as part of a means of changing attitudes and behaviours. It might be argued that targeting the issue of taking children to school would be a very effective way of approaching these complex issues as there is a means of educating children to influence their parents and set and embed better attitudinal outlook in the citizens of the future.

This Parish Council strongly resists the suggestion that the opening of the Northampton-Bedford Railway line should be pursued. This would imperil the high quality landscape that is characteristic of much of the land between the two urban areas and, as we have argued, elsewhere, *that* landscape and its value, for agriculture and green space quality, is an essential lure to attract people wanting to relocate their businesses and help effect the step change in the quality of the economy. It needs to be an essential element in the cultural marketing of the value of the County and its environs. That would apply equally to North Beds and North Bucks too

How can we improve and increase public transport patronage

Improving and increasing public transport patronage will require making people aware of the impacts of climate change and the need for everyone to get involved in making a contribution and applying peer pressure to encourage others is fundamental. Yoking this to the Health problems faced by the nation is also essential. People will need to be convinced that there are genuine alternatives that are appealing and attractive. Much of this requires changes management skills and might need to rely on local champions in communities as 'change agents'. We should also not underemphasise the power of trying to embed these messages and changes in behaviour in children as proselytes

8. Do you support Objective 7?

To ensure future development is based on sustainable development principle

18. 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

51. Do you support the policy approach in relation to funding and delivery?

We have no confidence in the proposals for the delivery of the specific physical, social and green infrastructure needed to enable the development and any pursuit of the vision.

Two specific examples are transport and flooding.

Northamptonshire has the rapidly growing traffic volumes. Even to begin to restrain this growth let alone reduce it would require a massively new model. We know now that building new major roads simply increases traffic and congestion. So, to posit a new urban orbital network extension at huge expense and damage to quality landscape would just compound existing problems. Besides the road proposal is entirely misconceived. Its creation to the road network would simply magnify the centrifugal tendency for outward commuting from Northampton and the E/NE of the county to the south – Milton Keynes and beyond - and worsen the existing chronic congestion issues. Secondly we don't feel it is viable given the massive cost involved in bridging the river, crossing a wide flood plain and ascending the hill in this area, and the existing flood risks and enhanced risks that would ensure from a new road and such massive new urban development. There is clear evidence of the high flooding risk from NRA publications. Northamptonshire already has severe flood risk issues – modelling to deal with the increased intensity of the causes and sources of such risks through the impact of climate change is simply absent.

In prioritising infrastructure it is important to recognise the importance of green and cultural infrastructure in helping to create an identity, sustain quality of life and address many of the deep rooted social problems that plague existing communities and help sustain fear of crime. There is an opportunity to go way beyond hard infrastructure through s.106 settlements and seek to create something much more imaginative and ambitious in our mapping out of the best management of the impacts of the new development.

We do feel that it is essential that a strong framework is established to influence development and interventionist, effectively project, management of the s.106 'developer contribution' process is needed. Developers must not be allowed to dominate and deter/deflect the strategic intentions. This will require

the sort of capacity and resources at the disposal of the Development Corporation and a preparedness to dictate to and be aggressive with the developers – effectively to ‘project manage’ and shape the development. An active not passive role is needed. We have no confidence in the JPU being able to perform this role,

To get a real grip on infrastructural provision will also require changes in the whole nature of permitted development e.g. a new insistence on flexible multi-use buildings (efficient integration of uses), ensuring community needs are factored into development, a strong focus on sustainability, and strenuous avoidance of unsupported infrastructure (the whole range of infrastructure, needed in an integrated form, so as to provide some guarantee of quality of life – transport, landscape and bio-diversity, utilities, green infrastructure, and social and cultural including some thought too to third sector involvement.

Again we have no faith in this being achievable given past experience. The failure to guarantee and specify the nature and delivery of infrastructure ahead of development taking place has meant recent provision has been inadequate and insufficient. Quality of life and success in creating sustainable community will always fundamentally depend on the availability of a diverse range of quality infrastructure. This is immediately evident in any cross-comparison of a successful and dynamic town with the present Northampton.

In future, to meet the challenges of the changing nature of the economy will increasingly require addressing all the Spatial Objectives together mindful of their linkages. Addressing them requires a more sophisticated model that synthesises ; indeed a model that builds on the key themes of climate change (and sustainability) and the role and relationship of the towns. The crucial point is creating a new model for economic prosperity that does not imperil transport, community and quality of life. This is the most fundamental challenge as it requires a more interventionist approach – without market intervention and restriction (shaping policy actively and assertively), none of the chronic problems and issues associated with development on the scale proposed will be managed and mastered.

20. Do you support the overall principle of option B focussing growth in a small number of larger development areas?

21. Do you support the combined choice of urban extensions?

See our answers below in relation to Qs. 27-31

26. Do you support the policy approach to sustainable transport?

See answer to Q. 16

27. Do you support the development of the preferred option Northampton North...?

29. Do you support the development of the preferred option Junction 16?

30. Do you prefer the development of the preferred option Northampton West?

31. Do you support the development of the preferred option Northampton South?

53. Do you support the rejection of 'Northampton Option 2 (Northampton East) and Northampton Option 5 (South of the M1 and South West)

PLEASE READ THIS ANSWER IN CONJUNCTION WITH THAT TO Q.28 BELOW

Our views here need to take account of our commentary on the need to maximise the use of brown field space and internal regeneration of Northampton within its existing boundaries as the starting point for development.

This offers a much greater chance of addressing fundamental future issues such as the many emerging facets of climate change, modal shift for transport and so creating a genuinely new sustainable urban model.

We commented in some detail in our Issues and Options consultation response on the need to maximise urban and town development. This should not be seen simply as a means of reducing the amount of land to accommodate the development and perhaps a means of lessening the impact on Greenfield development. It is too a means of seeking to create vibrant new urban space in the towns through this form of development, and affordable

housing, often in high density. This, as in many other towns, could be intrinsic to the revitalisation and regeneration of the town space and benefit their economic growth by supporting inward investment and dynamism. There could be multiple regenerative impacts and opportunities for a really new sense of direction and character from doing this effectively. Ambitious design and architecture should be concomitant elements; as should use of art and culture in the offer.

We believe – as is admitted in the Strategy – that there are a number of areas in Northampton that are in need of regeneration. A new visionary and more ambitious approach to their regeneration – perhaps using EU funding and European successes in regenerative modelling – has not been assessed. If so, in our opinion, there is significant scope for increased capacity to a much more sustainable model that delivers integration for the town. The town needs to embrace the Sustainable Communities Act philosophy and not look simply to annex high value green belt to the SE. Presuming that Northampton can be regenerated simply by modest investment and/or outward extension is at best naïve, at worst ignorant of reality. The culture of the town is embedded in its history and psyche. It cannot be transformed by a planning process, particularly one so defective in its approach to infrastructure

The Northampton Longer Term Growth Options Study concluded that focus should be on existing urban areas and specifically mentioned upgrading the eastern district area. This has not been given the weighting and emphasis that is due.

If there is to be any 'extension' of the town outwardly into green belt, which in principle we resist for the general reasons given in 1 about having no confidence in the overall vision and credible sustainability of the Strategy, then each of the options has some merits but equally risks and demerits.

We continue to feel that some combination of the options is perhaps best – ideally parts of options 2 (East) and 3 (North) - and make the following points.

Development to the north will provide the opportunity to deal with the most deprived areas of the town and those with poorer social and community infrastructure. This perhaps offers the best means, through good strategic planning and linkage to the University, of driving up the quality of life in this area and balancing out the inequalities of wealth and value between the north and south for the town. This could of course link to the improvement of the educational base to meet the visionary aspirations for the town. Development to the north does run less risk of encouraging dormitory commuting away from new settlements which is a more obvious risk issue from disproportionate focus on the south. This is a point on which we comment in more detail in relation to Northampton SE as a new option below.

Development to the South needs to be managed in such a way as to avoid the perpetuation of the present form of default to distribution and related businesses and, secondly, the encouragement of outward commuting associated with dormitory settlement. We see no evidence to suggest that the development can transform the current situation on these points.

We are still concerned about the flood risks associated with development to the South and the present paralysing state of traffic congestion (and the likelihood of effecting modal shift being realistically slight) although the Parkway option is perhaps a step in the right direction to offering something genuinely different. We also feel that there are risks about the development in the south reinforcing dormitory creation to serve Milton Keynes and the SE; for this reason the development to the west and north provides scope for an emphatic shift to something different that is not promoting commuting to other places but has a chance of creating new opportunities for balancing housing and employment.

If the options of simply moving the scale of development to another part of the country where it can be more appropriately accommodated and/or consideration of a whole new town development are not to be contemplated, then this offers the best hope of some form of transformation to the town and its sustainability by creating something more centripetal in terms of focus. We have not confidence that any southerly development can possibly control inward sustainability. It will simply continue to increase centrifugal focus for work shopping and leisure. The comparative deficit and the competitive leadership of places such as Milton Keynes and Oxford can offer is so huge as to render transformation on the scale envisaged a ridiculous pipe dream.

This Parish Council continues too strongly to resist any the suggestion that the opening of the Northampton-Bedford Railway line should be pursued. This would imperil the high quality landscape that is characteristic of much of the land between the two urban areas and *that* landscape and its value, for agriculture and green space quality, is an essential lure to attract people wanting to relocate their businesses and help effect the step change in the quality of the economy. It needs to be an essential element in the cultural marketing of the value of the County and its environs. That would apply equally to North Beds and North Bucks too.

We also feel that with Option 2 (East), some of the more key infrastructure is already in place and there are reasonably strong communities in places from which to build.

We also feel too that there are areas of greenbelt around the M1 and other transport corridors that have already been so compromised by development that further infill along these corridors is a sounder option than risking green belt that has more pristine and less spoilt character – this is very strongly the case with Northampton SE.

It is imperative therefore that all the plan proposals are properly considered in relation to neighbouring area planning. These must consider the evaluation of the Northampton SE proposal in terms of further enhancing outward commuting from Wellingborough and routes to Milton Keynes and the South. They must weigh these up against development on a more northern axis towards Corby/Kettering – as originally envisaged in the Regional Planning process - and the contrary scenario this might offer e.g. deterring further southerly centrifugal development and the possible creation of much more

sustainable form of communities focused on the towns – both Northampton and the expanding North Northamptonshire area towns - and using the new/accessible rail links provided in this direction. This could both counter the risk of more out commuting to Milton Keynes and the South East (in line with Local Transport Planning objectives) and provide new forms of transport corridor and opportunities for ‘modal shift’ that are so much more difficult to envisage in the area to the south of the town.

The issue of the ‘compaction’ of the urban form as a desired model for the expansion of Northampton is an entirely undebated point. There has been no consultation on this point. If this was a fundamental point, then the whole of the previous Northampton Implementation Area issues and options needed to be considered on this basis. In the context of the points just made, it can be argued that elongation of the development of the town might have more geographical and geo-spatial logic. It might offer more sustainability through focusing on transport corridors and taking advantage of synergy with the development of North Northamptonshire commented on above.

The most sustainable option and the one with most regenerative potential for the town (after making the most of options for Brownfield development) is to move the axes of residential and economic development to the north of the town – towards Corby/Kettering and Wellingborough – rather than sucking the life and growth of the town further by encouraging more out commuting towards Milton Keynes and the South East. Further development to the South of the town will simply lead to more people living outside Northampton and working at MK and/or off the M1 corridor. This would have consequential impacts on not effecting modal shift (in line with Local Transport Strategy) and adversely adding to climate change problems (and running entirely counter to the express statement about increasing ‘self sufficiency’ in the Strategy).

Moreover the primary and initial focus must continue to be Brownfield land in the urban areas – high rise and density - supplemented then by existing environmentally degraded major transport corridors – A45, A43 and M1. We feel that option 3 should be reconsidered and possibly the development of a ‘new town’ option near the DIRFT.

The few indications of critical thinking being applied to the other 4 options are scant and detached in the Strategy. This is a major weakness. There is no synthesis – no analytical evaluation. This is a disgrace given the huge public interest in the Issues and Options consultation and is sufficient reason in itself to reject the Emergent Core Strategy and simply demand the JPU goes back to basics and reconsiders the whole urban extension and NIA issue again.

The changing nature of the economic landscape is another good reason for so doing, as are climate change and other new strategic considerations as we already said in relation to the overall vision.

28. Do you support the development of the preferred option Northampton SE?

This Option has been presented completely 'out of the blue' with no relationship to the 4 previous NIA option proposals (commented on above) that have been considered by the JPU with stakeholders in detail (three were 1500 responses), following extensive consultation, but no useful evaluation of which has been presented in the public domain.

Indeed the few indications of critical thinking being applied to the other 4 NIA options are scant and detached. There is no synthesis – no analytical evaluation. This is a disgrace given the huge public interest in the Issues and Options consultation and is sufficient reason in itself to reject the Emergent Core Strategy and simply demand the JPU goes back to basics and reconsiders the whole NIA issue again. The changing nature of the economic landscape is another good reason for so doing, as are climate change and other new strategic considerations.

The only indication our community has had to the Northampton SE option was receipt of the Preston Green document produced privately by developers on which this proposal has clearly been founded. There is no other evidence to support its submission as the unexpected appearance of a completely new Option without history and evidence base. The Houghton proposal, the proposed transport corridor and the urban form compaction argument are all completely new. There has been no opportunity until now to assess any of them as they have suddenly 'emerged' from nowhere.

To us they collectively represent an attempt by the JPU to railroad through a dramatic change to meet the government targets on the declaration of an implementation area. Faced by the strong resistance from other places and inviting, open armed, the developer pressure for southern development (which developers as we know prefer rather than Brownfield and/or development north of the town), this has been seen by the JPU as their saviour.

However, it is entirely indefensible in terms of sustainability and meeting the express objectives of the Strategy. Secondly, from a democratic perspective its issue, as an almost emergency injection into a long process of consultation is entirely non compliant with the requirements of the planning process. Indeed so much is this so, that the communities affected will take any effort to pursue this option to formal complaint and/or review. Initially, that is taking the form of a detailed declaration of how the Strategy is simply not fit for purpose in its ability to meet the declared requirements of a strategy.

Any proposal in relation to the land SE of Northampton needs to be seen in the context of the relationship of this area with Milton Keynes, the South generally, and Bedford. Likewise the transport issues associated with a new road south need to be seen in the context of the trend for people to live in this area and, indeed areas around Wellingborough and Rushden and use the A6 and A508 as transport corridors to work in areas with higher house prices. Creating a major new transport artery providing people with the opportunity to access the M1, MK, Bedford and the south would simply accentuate the outward migration of county residents to escape from the towns, including

Northampton, the reverse of supporting regeneration and encouraging sustainability.

It is imperative therefore that all the plan proposals are properly considered in relation to neighbouring area planning. These must consider the evaluation of the Northampton SE proposal in terms of further enhancing outward commuting from Wellingborough and routes to Milton Keynes and the South. They must weigh these up against development on a more northern axis towards Corby/Kettering – as originally envisaged in the Regional Planning process - and the contrary scenario this might offer e.g. deterring further southerly centrifugal development and the possible creation of much more sustainable form of communities focused on the towns – both Northampton and the expanding North Northamptonshire area towns - and using the new/accessible rail links provided in this direction. This could both counter the risk of more out commuting to Milton Keynes and the South East (in line with Local Transport Planning objectives) and provide new forms of transport corridor and opportunities for ‘modal shift’ that are so much more difficult to envisage in the area to the south of the town.

The issue of the ‘compaction’ of the urban form as a desired model is an entirely undebated point. There has been no consultation on this point. If this was a fundamental point, then the whole of the previous Northampton Implementation Area issues and options needed to be considered on this basis. In the context of the points just made, it can be argued that elongation of the development of the town might have more geographical and geo-spatial logic. It might offer more sustainability through focusing on transport corridors and taking advantage of synergy with the development of North Northamptonshire commented on above.

The most sustainable option and the one with most regenerative potential for the town (after making the most of options for Brownfield development) is to move the axes of residential and economic development to the north of the town – towards Corby/Kettering and Wellingborough – rather than sucking the life and growth of the town further by encouraging more out commuting towards Milton Keynes and the South East. Further development to the South of the town will simply lead to more people living outside Northampton and working at MK and/or off the M1 corridor. This would have consequential impacts on not effecting modal shift (in line with Local Transport Strategy) and adversely adding to climate change problems (and running entirely counter to the express statement about increasing ‘self sufficiency’ in the Strategy).

There is no evidence of the specific physical, social and green infrastructure needed to enable the amount development proposed for Northampton SE. The Northampton SE proposal, the proposed transport corridor and the urban form compaction argument are all new. The presentation of public evidence to explain their supporting infrastructure is extremely weak and defective where it exists at all. Further comments on the lack of credibility include the absence of any evidence of engagement and buy-in of critical stakeholders where infrastructure is concerned. There is also the strong contrary argument that the green infrastructural value offered by the Houghton land and the hillside

villages landscape on the ridge above the flood plain provide strong reasons not to develop this land but to see it as an asset to entice people to consider moving to the town and so support the economic development proposals.

The strategic approach to this piece of landscape should be to protect and preserve its quality. More precisely this approach should recognise the visual and cultural value and sensitivity of the following areas, with Olney as the effective core of a rural hub, as a landscape 'entity' worthy of specific protection and enhancement on the basis of its intrinsic quality and value:

- the estate landscape associated with the villages on the higher ground between the A428 and A509 above the river flood plain – the hillside should become a strategic landscape buffer
- the whole of the Yardley Chase area and its estate hinterland including neighbouring villages on the hill above the river flood plain
- the abutting parts of north west Bedfordshire and the northern tip of Buckinghamshire

These areas have not been not marred and damaged by the blighting effect of the development of major transport corridors (indeed the A428 which is the central west-east route crossing the area has been downgraded by detrunking – such as the A45, M1) – and there is therefore much more to preserve in a relatively unspoilt state as a cultural and environmental asset.

The land concerned is not environmentally degraded by noise pollution and is of rich quality in terms of historic landscape value – it already represents high quality green infrastructure with settlements of character, individuality and rich heritage value. It also contains land of high agricultural value.

The attractiveness of this rural hinterland environment as a place to live will be a critical success factor in attracting high tech and knowledge based industries as sought for the town, enticement of which will also require conscious promotion and image development. This needs to be a key strand of strategic thinking and planning. By contrast, areas such as parts of West Northamptonshire already irredeemably impacted by transport corridors such as the M1 should be the focus of any development beyond the growth area boundary.

Moreover the primary and initial focus must continue to be Brownfield land in the urban areas – high rise and density - supplemented then by existing environmentally degraded major transport corridors – A45, A43 and M1. We feel that option 3 should be reconsidered and possibly the development of a 'new town' option near the DIRF

Northampton SE has no credible association with previous strategic planning.

The **Regional Plan** does not contemplate it as a possible area for development let alone posit that it might be developed on a scale amounting to a 'satellite town'. Rather this Plan is predicated on north and north easterly development, moving development away from the S and SE of the existing

town (which, as argued above, will only encourage centrifugal movement – outward commuting – to the Milton Keynes and Bedford area rather than offer a genuine chance of development towards sustaining the town). Northampton North offered much greater hope of achieving this. More argument on this point is provided above.

The Northampton SE proposal is completely out of alignment with the **Sustainable Community Strategy**. It is a wholly new proposal that has not been evaluated in any public sense with area stakeholders – see comments already made. It posits a wholly new direction for the development of Northampton. As the Sustainable Community Strategy forms the basis of the second **Local Area Agreement**, a document to which all the key area stakeholders have become partners in a compact with central government, this is a major failing.

As with the East Midlands Regional Plan and all the other associated plans associated with it (e.g. the **Local Transport Plan** which does not countenance any consideration of a new orbital route connecting the A45 transport corridor with the M1, a massive decision and infrastructural commitment which has no inherent logic in supporting the sustainability of the town as commented above) this Strategy is widely out of alignment.

There no **evidence base** to support the proposal. The extent and magnitude of the 2007 Issues and Options consultation process was considerable. This must have offered a massive evidence base on which to evaluate the 4 Northampton Implementation Area (NIA) alternatives both individually and in combination. However, no significant evaluation has been forthcoming and then, suddenly, from nowhere, without any credible underpinning by planning arguments and evidence in relation to the 4 NIA options, the JPU has presented the following entirely new proposals

- [1] the Houghton proposal
- [2] a new transport corridor with no linkage to the Local Transport Plan
- [3] an urban form compaction argument not presented before

So in summary on this point, no evidence has been made available by way of the consultation process so far.

Obvious examples would be traffic modelling studies, flood risk evaluation assessments. No evidence has been presented to make the Northampton SE the most appropriate and credible strategy when compared with the 4 other alternatives. It is not know why these were rejected and how they might therefore compare to Northampton SE, either individually or in some collective amalgam, as the planning authorities have not tendered any significant evidence on either point. This aspect of the draft Strategy is entirely non compliant with the expectations of the strategic planning process

We have no confidence that adequate research has gone into the Northampton SE proposal. We cannot possibly have confidence in its proportionality as, quite apart from the points made above about needing to

model in a wider strategic and spatial context, until this recent consultation Northampton SE, 'option 5' had not even been presented.

Although there is a huge amount of evidence in relation to the 4 NIA options that were the subject of the Issues and Options consultation, nothing substantive has been produced to suggest why these have been discounted and rejected. Indeed the extremely thin and narrow arguments given in the strategy in support of rejecting any places/areas – e.g. Ecton – are flimsy. They simply beg comparative analysis with the Northampton SE area and the need to apply the same 'value' arguments and weight them. In themselves they suggest that no significant comparative analysis has been made. They hint that some arguments – about visual and cultural sensitivity - presented in isolation by a neighbouring authority have been accepted without any critical comparison.

The Northampton SE proposal does not arise from views taken in **public participation** exercises. This was never an 'Option' in the public consultation – there was never a chance to evaluate it relative to the other options and consider it on its own or in combination with the other options. It was never part of the 'evidence' base. It has appeared suddenly at the eleventh hour of the process. As such its manner of presentation is entirely non-compliant with the mass of drivers that suggest that meaningful public consultation and engagement is an essential element of the process. There is a strong suspicion that this represents the wish of developers as is indicated elsewhere in this commentary.

As a consequence of its appearance, this is not an 'emergent' strategy. Emergence implies a logical sense of evolution but that does not apply here. There is no account of the views expressed by the 1500 respondents to the Issues and Options Consultation. There is no rationale as to why the 4 options have been rejected to provide a logical progression to this current next stage and why this should include a new and completely radical option at such a late stage.

We are entirely dissatisfied with the undemocratic manner of the imposition of this proposal. The original 'Issues and Options' consultation - proposing where the Northampton Implementation Area should be i.e. in which directions the town should expand - was extensive. There were several workshops, seminars and wide engagement; However, this remains unfinished business as already indicated. The contrast with the present consultation could not be more acute. By contrast, the imposition of the Northampton SE option has come without any community debate.

Allowing sufficient time for considered responses is imperative in any consultation process. The short summer period allowed here is simply not acceptable. This is even more evidently obvious when one factors in the fact that throughout the long consultation process emanating from the Public Examination of the MKSM and the Issues and Options paper on the NIA, communities now faced with absolute change – complete urbanisation in

place of former ancient rural community – were obviously not deeply engaged and treated as core stakeholders.

The precipitate remodelling of the plan has presented communities that have previously had marginal involvement in the process with a huge risk of massive urbanisation and the complete transformation of their village way of life. This is not just a modest component expansion but the addition of a volume of development tantamount to a new satellite. Such a massive change without any presentation of an evidence base has no credibility.

Until June Northampton SE was not a 'realistic alternative'. It was not one of the 4 options considered for the Northampton Implementation Area options that were subject to deep analysis as part of the 2007-2008 consultations. It appears to be an 'invented alternative' selected because it has strong developer support not for credible planning reasons. We don't believe that there is anything obvious about Northampton SE as the choice once it is evaluated holistically.

Sound reasons are given in the emergent core strategy for not building south of the M1. These reasons not apply equally to building south of the River Nene. The ridge land above the flood plain south of the river should be treated as a strategic landscape buffer for the reasons argued above.

The plan does not make it clear how the **infrastructure** needed to support the strategy will be provided. This is not surprising given that the Northampton SE proposal, the linked proposed transport corridor and the urban form compaction argument are all new options that have suddenly appeared as an option.

The proposed new **transport links** – which have never been envisioned in the Local Transport Strategy - will cost a lot – possibly £100 – £200 m. We don't believe central government would sign up for a contribution of this order especially since the proposal does not even feature in the LTP.

Besides the road proposal is entirely misconceived. Its creation to the road network would simply magnify the centrifugal tendency for outward commuting from Northampton and the E/NE of the county to the south – Milton Keynes and beyond - and worsen the existing chronic congestion issues.

Secondly we don't feel it is viable given the massive cost involved in bridging the river, crossing a wide flood plain and ascending the hill in this area, and the existing flood risks and enhanced risks that would ensure from a new road and such massive new urban development. There is clear evidence of the high flooding risk from NRA publications

Looking at the landscape that would be developed there is no **comparative analysis** of its quality and what would be entirely transformed by urbanisation. We are not aware of any assessments of the rich and diverse value of this area of landscape and its heritage, designated and otherwise.

There are also **major stakeholder issues**.

It is well known that a key landowner/estate does not support the Emergent Core Strategy. Moreover, he is implacably opposed. If Northampton SE were to be carried through his settled estate would need to be bought out by Compulsory Purchase Order (CPO). We don't see this as politically possible and would be a gross violation of CPO. In short the new Option 5 requires CPO but WNDG has stated in public meetings that they have no intention of using CPO for housing purposes. They have stated that they would only use CPO as a last resort for securing minor pieces of infrastructure to support a development (equivalent to sorting out a ransom strip equivalent). To take the estate on using CPO would be legally countered and we don't feel the JPU would stand a chance of success.

We have no confidence that the **National Health Service** are signed up to this strategy and the consequential increase in the capacity of Northampton General Hospital to serve the extra 42,000 extra homes in the Northampton area, 18,000 of which are designated for Northampton SE.

Likewise we do not expect **Anglian Water** to endorse the proposal. Firstly there is the issue of the current problems emanating from the Billing Treatment works that affect all the adjacent communities, quite apart from plans for coping with the extra 18,000 dwellings in Northampton SE.

The **National Rivers Authority** has identified the risk around 'unstable' land areas (in line with PPG14) and option 5 is planned on sloping land with no evidence of risk assessment of the risk of solifluction.

The Strategy is very defective on deliverability compliance. We are of the view that the development of Northampton SE offers absolutely no guarantees of sustaining the town which is essential to the vision. Rather we feel it would have a contrary effect and simply exacerbate the existing issue of outward drift to the further detriment of seeking to build a sustainable future for the town.

The 18,000 proposed houses will have only two connections with Northampton town – a new link road to the east, the present Bedford Road and an unspecified 'public transport link to Castle Station. This will not improve the sustainability of Northampton. With the re-positioning of Junction 15, the new occupants of Northampton SE will take the improved road route to Milton Keynes not Northampton. They will do this for work and for their social and cultural life.

We have no faith and confidence that **flood risk assessments and zoning** have been carried out in the Northampton SE area. Quite apart from this deficiency, DEFRA's Flood and Water Management Bill is fast on the way to becoming law. Amongst the raft of changes, it will require a new way of working for all flood risk stakeholders in England and Wales. This will bring new responsibilities and the need to develop a new paradigm for cooperative flood management

52. Are there any other comments that you would like to make?

We do not feel that the Emergent joint Core Strategy is fit for purpose and have produced a report to this effect explaining in detail its large deficiencies in relation to the following

- Dealing with allocation of strategic sites and Submission Proposals
- Evidence of infrastructure provision
- Consistency and conformity with other strategic planning
- Lack of robust and credible, proportionate and relevant evidence base
- Community engagement and participation processes
- Appropriateness of its evaluation of alternatives
- Deliverability and flexibility
- Sustainability – envisioning and deliverability
- Flood risk assessment

It will be obvious that there are many crossovers overlaps too in these points. Indeed they are all interlinked in some form.

The lack of credible evidence base, for instance, links to the poverty of the judgement and evaluation which has connections with the disjointed and uneven quality of the community engagement and consultation process. Likewise the inadequacy of the provision of infrastructure directly links to the lack of credibility for sustainability and deliverability.

There are countless other examples of crossover and it is crucial that our whole statement on fitness for purpose is read in its entirety.