

## Lucy Staves

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**From:** Hardingstone Parish Clerk [REDACTED]  
**Sent:** 09 June 2016 11:47  
**To:** Planning Policy  
**Subject:** Response to Northampton Local Plan Part 2 issues and options consultation  
**Attachments:** HPC Comments on Local Plan Issues and Option Consultation.docx

Dear Planning  
Please find attached the response of Hardingstone Parish council to this consultation.

*Sally*

Mrs Sally Willis

(Please note new email address:- [REDACTED])

Clerk to Hardingstone Parish Council  
[REDACTED]

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## Kate's Comments on Local Plan Consultation

Q1. What are the main issues relating to housing delivery, mix and affordability which the Local Plan (Part 2) should consider? The Local Plan (Part 2) will not be reviewing the number of new homes that is already identified in the adopted Joint Core Strategy.

Developers are reluctant to use more expensive brownfield sites, and so are directing development towards the countryside at the edge of urban areas. This is destroying the character of the old villages (e.g. Hardingstone), urbanising the countryside and separating existing residents from access to green areas, as the rural boundary moves further into the distance. The small green areas which are provided in partial mitigation are urban and municipal in character rather than the natural and rural areas they have destroyed.

Q2 Do you think that we need sites that can deliver new homes more quickly, in the short to medium term?

No opinion.

Q3 Do you think that we need a mix of market housing e.g. family homes, housing for single households

Yes. We need a mixed balance of families, couples, single people; young, middle and old aged; renters and homeowners; variety of working backgrounds; long-term and short-term residents. All are welcome and contribute something, but balance is required in order to build a stable yet vibrant community.

Q4 Do you think that we need a mix of affordable housing e.g. affordable rent, social rent, shared ownership, Starter Homes?

Yes, we need to cater for all different situations. The inclusion of discounted homes to buy within the definition of affordable homes is worrying, as the financial incentive is a one-off and so the 'affordable' aspect benefits the first buyers but not first time buyers of the future.

Q5 Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to access and space standards?

Opting in to standards for space would therefore be a good thing, as RIBA have found that England's new houses have the smallest amount of space in Europe

(<https://www.architecture.com/files/ribaholdings/policyandinternationalrelations/homewise/casefor-space.pdf>)

Q9 Do you think there are any areas within the Borough where certain types of employment development are generally acceptable but which currently require planning permission, which could reasonably be dispensed with through the introduction of a Local Development Order?

Perhaps in the middle of an industrial estate, e.g. Brackmills, but there may still need to be restrictions e.g. building height, parking and / or public transport provision. If this can be controlled by a Local Development Order, it may be possible.

In areas close to other uses, e.g. near residential land use, employment developments would need to be carefully assessed so a LDO would not be appropriate.

Q10 Please provide details of any particular infrastructure issues in relation to new development which you think the Local Plan (Part 2) should address, if possible providing evidence?

Roads. In certain areas traffic is such a problem that it takes very little to reduce roads to a standstill. I commute to MK, and the M1 and / or A45 is blocked so frequently that I have to divert to use the B526 at least once a fortnight.

Public transport is practically non-existent in the evenings to the south of the town. We need more services in peak hours and early mornings / late nights; if necessary, reduce the services during the day when a lot of people are at work.

Recreational facilities, particularly communal sports (e.g. swimming pools) and open spaces. The parks we have are generally very good quality, but we are not creating new parks at the rate of new residential developments, so many areas of the town do not have easy access. Countryside is also retreating as the town grows. All residents should have access to open spaces and nature.

Q11 How do we ensure a successful town centre in light of changes to shopping habits such as increased use of out of town retail and on-line shopping? The Local Plan (Part 2) will not be reviewing the retail growth which is set out in the adopted Joint Core Strategy.

Shopping habits have changed so much that town centres need to be viewed differently. A much more mixed usage is needed, with multiple recreational uses and events to encourage people into the centre. Shopping (and eating at cafes) can no longer be seen as the main attraction of a town centre.

Q13 Is there a need for the Local Plan (Part 2) to include a locally specific policy to protect and enhance areas of biodiversity in addition to the policies in the NPPF and Joint Core Strategy?

It would be helpful for the Local Plan to identify particular 'types' of habitats which are important locally – either because of local distinctiveness or because of a shortage, e.g. Upper Nene Gravel Pits as habitat for golden plovers. This would encourage developers to appropriate enhancement rather than a one-size-fits-all approach.

It would also be useful for the Local Plan to identify particular areas where biodiversity is in need of enhancement.

Q14 Do you think there are priority areas where green infrastructure networks could be enhanced or extended?

Yes, and the Northamptonshire Landscape Sensitivity and Green Infrastructure Study provides a good start. This Study should be updated as it is now 7 years old.

Particular areas include the green way which runs through the town centre, out through Delapre Abbey and Hardington / Wootton into Salcey Forest; and the River Nene as a blue / green network, leading on to the Upper Nene Gravel Pits.

Q15 Is there a need for the Local Plan (Part 2) to include a locally specific policy to protect and enhance heritage in addition to the policies on the historic environment in the NPPF and the Joint Core Strategy?

Yes, the local policies should identify important areas and eras of local history which warrant protecting, as this is not included in the NPPF and JCS, and isn't known by the developers. E.g. agricultural history, history of navigation of the Nene, development of shoemaking and associated industries, brewing, non-conformism etc. This will help to protect those remaining important elements of the townscape which don't happen to be in the appropriate conservation area and aren't listed.

Q17 Do you think there are locally important landscapes which should be identified in the Local Plan (Part 2)?

Outside of the town centre there are clear, locally distinct landscapes which need protection, e.g. the Nene valley and the ridge ending at Hardington. There should also be a focus on preserving those rural areas which do still exist, and which are barely mentioned in this documentation, e.g. fields around the back of Brackmills and Great Houghton.

It would also be good to identify locally important routes and trackways, for historic value, amenity value and as common important routes through the town e.g. the Roman 'Portway' path from the town centre and through the back of Delapre up to Hardington; and the route through Hunsbury to the lakes and Sixfields. If planners and developers understand how people move around, and why they use each area (e.g. shortcut, commuting, keeping fit, recreation) they will have a much better idea of what development and treatment is appropriate.

Q18 How do we ensure new development preserves and enhances character and appearance and makes a positive contribution?

By recognising the important characteristics and distinctiveness of an area and requiring design that responds to it.

Open spaces are important and there should be something in the plan to encourage that they be built in to new developments, and protected and 'kept up' wherever they currently exist. However,

rather than a standard approach to all spaces, e.g. strips of municipal grass, it needs to be appropriate to the character of the area and planned for year-round interest, wildlife habitat and long term sustainability. Instead of short monoculture grass areas, think about longer meadow grasses with wildflowers (which would also be cheaper to maintain).

### Central Area Action Plan

Question 23 - Inner Ring Road (Policy 6) - is the proposal for the Inner Ring Road still appropriate and up-to-date?

The aims are OK, but updated traffic counts are needed to check whether growth is in line with predictions, and whether the aims as stated are achievable.

Question 24 - Safeguarded Public Transport Route (Policy 8) – is the proposal for a public transport / cycling / walking route still appropriate and up-to-date?

This route would have been better preserved as a railway, with investment in trains to bring it back into use. Now that the rails have been removed it should certainly be brought back into use as a public transport route, even though it can no longer be railway.

Question 25 - Pedestrian and Cycling Movement Network (Policy 9) – should this policy be updated to link to the County Council’s Smart Corridors initiative? Are the identified routes into and across the town centre still up-to-date?

No comment.

Question 26 - Parking (Policy 10) – should the Council identify more car parks within the town centre and if so, where should they be?

The policy appears punitive by restricting parking without offering realistic alternatives such as enhanced public transport (see Policy 9!). I would prefer to see better public transport, but if this is not to be provided then extra parking will need to be found.

Question 32 Do you have any comments on the Sustainability Appraisal Scoping Report?

### Sustainability Appraisal

2.13 Supplementary Planning Documents - the Affordable Housing Interim Statement SPD will need updating following proposed changes from the government on affordable housing. The SA should also consider the Parks and Open Space Strategy for Northampton, and the conservation area management plans.

3.6 (geography) should include strong links - commuter and entertainment - to London.

3.61&2 - patterns of travel / commuting need to be broken down into different areas of the borough, to understand the needs of the different areas.

3.64 - the stated improvements are debatable – the bus station, for instance, which leaves many travellers standing out on the Drapery in all weathers waiting for their bus, and could well have discouraged public transport use. Reviews of each of these ‘improvements’ would be useful, to

determine what new requirements they have brought, and what old requirements remain to be fulfilled.

3.71-76 Biodiversity section should take note of the green networks identified in the Northamptonshire Landscape Sensitivity and Green Infrastructure Study, e.g. the green / woodland network from NE to SW leading to Salcey Forest.

3.80 says there are 7 scheduled monuments, 3.81 says there are 8 scheduled ancient monuments. Which is the extra one?

#### Table 5.1 – Objectives and questions

1 Housing – needs a question about balance between different types of housing.

2 ‘Reduce the need to travel in Northampton by providing easy access to jobs, services and facilities without the need to travel by car’. This sounds like the aim is to dissuade people from travelling into N-ton for services, which won’t help its economic vibrancy. This objective would be better phrased as ‘reduce the need to travel by car within, to and from Northampton, by providing easy access to sustainable travel alternatives’.

3 Siting residential developments and schools to reduce travel is really part of 2. Should also refer to access to schools *with sufficient places* to absorb the children living in the new development.

4 Improve health. This should explicitly include physical and mental health and wellbeing, and access to countryside should be given more priority. Links to Northamptonshire Health and Wellbeing Strategy 2013-2016.

6 Employment and economy. Tying a 13 year plan into broadband is short-sighted. 4G is already taking over. It would be better to say ‘communication technology, e.g. broadband’.

7 Character and vitality of town centre. We need to strengthen the 24hr economy not just the evening economy. The reference should be to a *range* of housing, not just to housing. I would add something about facilitating travel and the desire to travel into the town centre.

9 Biodiversity – include important green sites which support biodiversity but have not been designated, e.g. Hardingstone’s Cherry Orchard.

11 Protect and enhance the historic environment. Generally good, but no mention of the local list and non-designated assets, which require protection in NPPF.

12 Air pollution – it is not ambitious enough to just limit an increase in air pollution, we should be aiming for reduction. The DEFRA 2007 paper on air quality stresses improvement (p71 / 120 of committee paper)

#### Appendix 1

NPPF – The scoping document doesn’t pull out the objective of maintaining assets which the community holds as important – it mentions green belt but nothing more. Also it doesn’t mention social sustainability, or building sustainable communities.

White Paper on Natural Environment – The document mentions the aim of reconnecting people and nature but doesn’t translate this into an objective – the objective is about enhancing natural environment (9 and 10) not enhancing access to it. This needs to be included in the objective.

## Appendix 2

Assumptions regarding walking distances – there is no justification for taking the straight-line distance from edge to edge. The distances are used to judge likely human behaviour and so should reflect human experience, which is more likely to be centre to centre, and which would follow paths and roads. Also, why assume that people would be willing to walk further to school, work and a railway station than to town? ‘It is considered that this is a reasonable approach’ is not good enough justification for a methodology; it looks more like ‘this will make it easier’.

### Table A2.1 Effects on objectives

1 Housing – the document states that all housing developments will have a positive effect, but whilst it will have a positive effect on the amount of housing, this is not necessarily the case for ‘range’ of housing, increased social housing and improved stock of housing.

2 and 3 Reducing travel – there are problems with distance assumptions (see above). Otherwise these sections are generally ok, but it also needs to take into account whether the site would give easy access to longer distance services and employment. For example, development near M1 may encourage commuting to London, MK, Birmingham by car.

4 Health – it should consider open space separately from sport, as open space can contribute to wellbeing, reconnecting people with nature. Employment sites are measured only by proximity to residential developments, but they should also be considered for proximity to facilities for health. If employment sites are close to open space or sports facilities, workers can make the most of these for a healthy lifestyle in breaks and before and after work.

5 Crime – it states that location is not important for crime, but links to the surrounding areas can increase the fear of crime. For example, Hardingstone’s pedestrian links to town are through underpasses only, which many may fear to use after dark.

6 Economy and jobs – No comments.

7 Vitality of Northampton town centre. It claims that residential development won’t have an impact on the town centre’s vitality, but it could do if it is sited for easy access to other commercial sites, e.g. residential developments to the south of the town may encourage residents to use London and MK; to the east may encourage the use of Raunds; and to the north residents may prefer Market Harborough and Leicester.

8 Greenhouse Gas emissions – No comments.

9 Biodiversity and geodiversity – No comments.

10 Townscape and landscape and 11 Heritage. Contrary to the assessment, we can’t assume that redeveloping a brownfield site will always be positive – it may have been a positive contribution to the character of the area, and be replaced by a completely inappropriate development. Similarly we can’t assume that it will always be beneficial to redevelop a brownfield site in a built-up area (11) – the site may make a positive contribution, or may be a much needed open space.

12 Air pollution – No comments.

13 Water management – No comments.

14 Flooding – No comments.

15 Soils and Minerals – No comments.

16 Waste Management – No comments.

### Q33 Do you have any comments on the Draft Statement of Community Involvement?

There needs to be a plain English summary of every document greater than 5 pages, the summary being no more than 10% of the length of the document. You cannot expect members of the public to wade through documents like this – 173 pages long. If this is all you present them with, it begins to look like public comment is not welcome, and consultation is a tick-box exercise.

### Land Availability Assessment and call for sites

There is no question on this, but it is ripe for comment! The proposed method seems to leave out the public and community completely from this early stage, with the result that an assessment may deem a site as 'available' without any understanding of whether the existing or surrounding communities would welcome them or not. This would mean that the public would only be consulted at application stage, by which time a lot has been invested into making sure the development goes ahead whatever. In determining availability / viability, it would be better to include the community by the following steps:

- Add a question to the site proposal form – have you had any discussions with the local community before suggesting this site (e.g. Parish Council, consultation event)? Give Details.
- Proposed sites should be added to a publically available list as soon as they are received, not just when they have been assessed. As soon as they are received the local parish council, CAAC and neighbourhood groups should also be actively advised and asked for comment.
- Add a stage to the assessment to check whether the site is mentioned in a community plan.
- The assessment of proximity to heritage assets should include valued landscape and townscapes, and non-designated heritage assets (consistent with NPPF).