PAGE 2: Fair Processing Notice issued under The Data Protection Act 1998

Q1: Please provide your contact details in the boxes below:
   Name
   Position (if appropriate)
   Company (if appropriate)
   Address 1
   Town
   Postcode
   Email Address
   Phone Number

   Patrick Cross
   Chair
   Whitehills & Spring Park RA
   Northampton

Q2: Are you an agent responding on behalf of another?
   
   No

Q3: If you are an agent responding on behalf of another, please enter your details below:
   
   Respondent skipped this question

PAGE 3: Consultation on the Northampton Local Plan (Part 2)

Q4: 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.

What is the NBC's definition of "affordability"? Is it based on a price e.g. £125,000 or a gearing of a joint income e.g. 3 1/2 times joint income?
Some Developers start with a high % of affordable houses to get through the Council Planning stages only to renge when the building starts. How will this be controlled? Which NBC Officer will have the authority to monitor and control these Developers?
We owe it to our younger generation to help them get on the home ownership ladder by making sure Developers are controlled to provide at least 30% housing units in the affordable range of £100,000 to £150,000.
There is also a need to build homes with reasonable garden space rather than "stacking" them on top of each other as tower blocks.
The main issue here t a) We need a definition of "Affordable" b) who and how will control a reasonable % (30% is reasonable) of affordable housing based on the definition from a)? c) What % of homes will have reasonable garden space?
Q5: Do you think that we need sites that can deliver new homes more quickly, in the short to medium term?

No new homes should be delivered without appropriate infrastructure being planned and delivered BEFORE the new home dwellers move in. This infrastructure includes a) a fully functioning and operational inner and outer orbital road systems to get traffic through and out of town effectively, and putting more traffic lights, pedestrian crossings in town does not solve the problem of congested arterial roads which exist today. b) Medical Facilities (Hospitals & GPs) where waiting times are within Government guidelines and can deal with both a growing and ageing population. c) Schools which do not involve excessive commuting times and can keep communities together rather than fragmenting them both within families and in the neighbourhood.

We strongly recommend an "i before e" mantra here.... infrastructure before expansion

PAGE 5: Consultation on the Northampton Local Plan (Part 2)

Q6: Do you think that we need a mix of market housing e.g. family homes, housing for single households?

The NBC should know the current demographics of our town and make some reasonable projections based on aging population, business employment potential within the region and lifestyle of our younger generations. A mix of housing and homes should be based on this analysis and NOT based on the whims of Developers to maximise their revenue and profitability. In other words, Council and people driven and NOT Developer driven

PAGE 6: Consultation on the Northampton Local Plan (Part 2)

Q7: Do you think that we need a mix of affordable housing e.g. affordable rent, social rent, shared ownership, Starter Homes?

Yes, but as stated in Question 3, this must be driven from analysis and case studies and not by Developers speculating and "lining their pockets". The NBC Council must be strong and people driven. The recent JPU Council was weak and did not jointly plan for the whole, but defaulted to "nimbyism".

An example was that Langams developers attended a Planning Meeting re affordable housing on the Pearce Leather site... and the Planning committee allowed them to renage on the affordable housing percentage (to nil) to make the site and the plan viable. The Planning Committee made no reference to where or how that percentage would be 'made up'

PAGE 7: Consultation on the Northampton Local Plan (Part 2)

Q8: Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to access and space standards?

Far too many new houses and homes are built based on maximising units per hectare. This is at the expense of space and quality of life for families and single occupants. We need to remember the social problems of tower blocks and ensure this does not happen with cramming units into spaces where everyone is overlooked by others and overlooks others. Noise, privacy, and visual obstruction are ingredients for a good quality of life

PAGE 8: Consultation on the Northampton Local Plan (Part 2)
Q9: Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to water efficiency standards?

Northampton experience Summer water shortages and also winter flooding. These two issues should be considered as an opportunity to resolve both. On the north of Northampton on the A5199 near the Windhover Pub, there is a flood plain designated by the Environmental Agency. This area could be dug out to make a reservoir, the soil taken along the Northampton - Market Harborough rail track to build the banks to flank the orbital road system out of town. This solution would provide efficient water systems, an additional leisure feature, solve the flooding problems and minimise the risk of drought.

Q10: Are there particular sites that are not used currently for employment uses which you consider would be particularly suitable for new employment uses? The Local Plan (Part 2) will not be reviewing the jobs growth which is already set out in the adopted Joint Core Strategy.

Housing and employment units should not be mixed on the same site. It is sheer folly to think that people will keep their car at home and walk to an employment unit on their development. Housing sites should be just for houses and employment sites should be for employment. This makes it easier for all the logistics involved including the emergency services. Existing employment sites such as Brackmills, Moulton Park, Lodge Farm, Sixfields, etc should be the focus of employment expansion and not the Town Centre.

Q11: Outside of the Enterprise Zone, are there any other existing employment areas where opportunities could be improved and vacancy rates could be addressed? If so, how could this be achieved?

Here, medium to large businesses need attracting to Northamptonshire with Northampton as a hub for employees to live. This is where the Orbital Road system comes in as this route would be an obvious location for medium/large businesses to locate. These businesses should offer substantial apprenticeship schemes as a condition of location. This should be in the region of 3%-5% of all jobs to encourage our younger generation to persue a career and not just settle for a job. The manufacturing industry sector needs expanding more than just logistics and distribution. Engineering will endure a future shortfall unless we act now.

Q12: 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?

We have no direct knowledge on this question but As a complete aside, we need a teaching arm to the Hospital. Is this in the mindset of strategic planners.
Q13: 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?

Waspra undertook a traffic survey in November 2013, which concluded that our arterial roads are overloaded and congested against the Buckton Fields Developers estimates for 2020. This Report was presented to NCC Highways in January 2014 and accepted as a valid assessment. This study concerned the A508 and the A5199 in the north of Northampton Borough.

The current policy that Developers do not have to solve the traffic problems outside their development is highly questionable. Surely if their development adds to the traffic problems outside their development, then they are responsible for more than just mitigating the problem with traffic lights and bigger roundabouts? So who has this responsibility? We do need a Highways Champion who will look after the whole picture and not just kerbs and potholes.

PAGE 13: Consultation on the Northampton Local Plan (Part 2)

Q14: 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.

We need the "big boys" such as M & S, John Lewis, Next and other quality outlets to establish themselves in the Town Centre. These will attract others which will increase footfall. The current trend for more charity shops, wine bars and 99p shops is not exactly building a character for our town to attract shoppers from both outside and inside town. There should be regular (free) shuttle buses from Park & Ride zones (Sixfields, The Railway Station, etc) to keep the Town Centre traffic free such as Cambridge, Chester, etc. There is a need to see how other succesful towns and cities do this. On line shopping does not always include a purchase but is the start point for a subsequent visit to a retail outlet to browse, choose and seek help and advice from good customer services personnel. Recent changes to shoppers parking have helped but we need a borough-wide forum involving planners and the community to 'board-blast' ideas.

PAGE 14: Consultation on the Northampton Local Plan (Part 2)

Q15: Are there areas where the location of betting shops and hot food takeaways should be restricted?

Not near schools, not near residential areas. Many of our social problems are routed from excessive gambling. Litter is a problem with food takeaways. Anti-social behaviour can be associated with both of these facilities, so they need to regulated as to how many and where.

PAGE 15: Consultation on the Northampton Local Plan (Part 2)

Q16: 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?

Our numerous and beautiful parks MUST remain green areas and not sold for development. More effort into water based facilities e.g. Abington Park, Sixfields and our proposed reservoir in the Flood Plain by the A5199/Windhover area to maintain and attract more wildlife to our area is needed rather than just concreting over everything. An example is the fact that we have a wonderful green space at Bradlaugh Fields.... but how many use it, how many rate it as a an area of biodiversity and how much is being invested in this area to 'put it on the green spaces map'.
Q17: Do you think there are priority areas where green infrastructure networks could be enhanced or extended?
Bradlaugh Fields

Q18: 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?
Northampton has a bad record on heritage. e.g. the Fountain in the Market Square, Notre Dame in Abington Street, the discontinuous building lines of the Market Square and Regents Square, and the complete loss of our heritage as a Market town. All planning applications should be judged on appearance and blending as well as functionality.

Q19: Should the Council review the list of locally listed assets of historical importance?
Yes of course. This should be made available to the public for review as there may be omissions. Does this exist on a website?

Q20: Do you think there are locally important landscapes which should be identified in the Local Plan (Part 2)?
All of our Parks of course. These should not be built on at any cost or justification. The Express Lift Tower is an important landmark for Northampton. The thought of a "competing" eyesore landmark with the proposed Recycling Plant is highly questionable from a visual and also a safety/environment viewpoints. This town needs vision as well as practicability.

Q21: How do we ensure that new development preserves and enhances the character and appearance of the Borough and makes a positive contribution?
The character and appearance of our Borough is currently very poor. Pockets of blooms in the streets are very good, but this only covers a small percentage of our Borough. Retail Waste bins, litter blowing around, cigarette butts and chewing gum on pavements blight our Town. The current campaign to catch and fine litter droppers should be continued indefinitely so a higher standard can be maintained and upheld. New developments must include appropriate litter bins which should be collected on a regular basis and roads and pavements swept.
Q22: Is there a need for the Local Plan (Part 2) to include a locally specific policy to promote measures within new development to address climate change and renewable energy in addition to the policies in the Joint Core Strategy?

New developments should include solar panels on all properties as a planned solution rather than an afterthought - wind technology should also be considered. There should also be plans to manage domestic and industrial grey water and recycle rather than putting this grey water down the drains.

PAGE 22: Consultation on the Northampton Local Plan (Part 2)

Q23: Should we review and incorporate existing Interim Planning Policy Guidance (e.g. Affordable Housing, Houses in Multiple Occupation, etc) into the Local Plan (Part 2)?

WASPRA are against the recent explosion pf HiMOs. this development has gone on reasonably unchecked with only one Councillor on the Planning Committee showing a constant and consistent opposition. HiMOs change the cultural make-up of an area and Semilong and the Mounts are good examples of this change. HiMOs need stronger governance and planning considerations than at present.

PAGE 23: Consultation on the Northampton Local Plan (Part 2)

Q24: Are there any other issues that the Local Plan (Part 2) needs to consider?

These have been mentioned before in earlier questions, but are repeated here for reference. 1) infrastructure before expansion e.g. a completed orbital road system out of town to relieve the already overloaded arterial roads such as the A508 and A5199. 2) Provision on medical facilities for the growing and aging population of Northampton and environs where waiting times are within government guidelines. 3) Provision of local schools so residents children are not split up from their brothers/sisters and travel times to school are achievable by walking. 4) All Residents Associations should be consultees on ALL planning applications (Large and small) impacting on our area. For Waspra, this means the entire Whitehills & Spring Park Ward.

PAGE 24: Consultation on the Central Area Action Plan

Q25: Flood Risk and Drainage (Policy 5) - is this policy still appropriate and up to date in relation to the Drainage Plan Part 1?

The north of Northampton is in a Flood Plain. The 1/200 risk is out of date and needs revising as more concreting over fields and global climate change will produce those "exceptional" occurrences more often. 1998 was the last bad flood. When will the next be? Building on flood plains is highly questionable e.g. the 41 units to be built on the A5199 just outside the Town boundary. We believe that there is credible evidence that says that Northampton is renaging on promises and strategic plans made re 'Flooding' made after the 1998 floods. The residents of these future properties will be calling the Northampton Borough emergency services when their properties flood.

PAGE 25: Consultation on the Central Area Action Plan
Q26: Inner Ring Road (Policy 6) - is the proposal for the Inner Ring Road still appropriate and up-to-date?

This inner ring road is a fragmented combination of many roads with many traffic lights and pedestrian crossings and does not flow as a ring road should. No amount of tinkering with the pinch points will increase its overall effectiveness. e.g. St Peters Way and Abington Square. The need for a heavy traffic inner ring road would be mitigated if we had an effective outer orbital road system. This would deter traffic from going ‘through’ the Town to get to the other side i.e. West to East; North to South and vice versa,... and to allow traffic passing through to properly drive ‘around’ the town rather than ‘through it’.
An outer orbital road would also produce perfect locations for businesses to base their operations being accessible from inside and outside the Town for their suppliers, customers and employees. Big Employers take note of a town’s overall traffic infrastructure as transport costs are fundamental to most company profits.

PAGE 26: Consultation on the Central Area Action Plan

Q27: Safeguarded Public Transport Route (Policy 8) – is the proposal for a public transport / cycling / walking route still appropriate and up-to-date?

The current Town Bus Station is an example of poor planning. It is too small and should have been sited next to the Railway Station. If modal shift is a tactic to encourage car users to leave their cars at home and catch the bus, then this has been a total failure. Our Traffic Survey in 2013 showed a SOV (Single Occupancy of Vehicles) as 84%. This is 5 out 6 vehicles out of a total of 57,000 observed had one driver only. The layout of Northampton and surrounding villages and the employment demographics mean that most people will still use their cars for work, school trips, leisure and retail.
We should of course encourage walking, cycling, even motorcycling, but this will only scratch the surface of modal shift success. We have to plan for transport in those dark days in November through February as the norm.
On a positive note, the Norbital Cycle path and the Brampton Valley linear park are a bonus to the town.

PAGE 27: Consultation on the Central Area Action Plan

Q28: 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?

The Norbital and the Towns cycle paths are very good. Recent Sustrans investment has greatly enhanced our borough-wide network.
We have little knowledge on the County Councils initiative but on the face of it, anything which improves the way in which residents and visitors can navigate their ‘to work’ and their leisure activity should be considered.

PAGE 28: Consultation on the Central Area Action Plan
Q29: Parking (Policy 10) – should the Council identify more car parks within the town centre and if so, where should they be?

The current multi storey car parks (e.g. St Michaels & the Airehold) are a blot in the landscape. They are concrete jungles with litter, poorly maintained and feel unsafe, especially at night. Building more of these or extending them skywards is not a good solution. A better solution would be to use existing ground level parks such as Sixfields and Midsummer Meadow with an efficient free shuttle service with trams or overhead pods. We should deter cars from the Town Centre by making it more pedestrianised with covered streets. This strategy requires a little imagination and something more sustainable rather than just “more car parks”.

Properly considered and sited outlying ‘Park and Rides’ should be considered. These work well in visionary towns and cities.

PAGE 29: Consultation on the Central Area Action Plan

Q30: Improving the Retail Offer (Policy 13) – this policy needs to be updated due to changes in Government policy such as the extension of permitted development rights. Do secondary frontages still need to be identified?

The recent Award for St Giles Street is a good start. However this needs extending to the other main streets (secondary frontages) in Northampton e.g. Gold Street, The Drapery, Abington Street, and Bridge Street. If Northampton is to compete with Milton Keynes, Market Harborough and others, then the whole package needs to be in place and not just one street.

This will require a major commercial initiative to attract appropriate retail giants to our Town. This should be politically free and should involve local experts, e.g. The Chamber of Commerce, The University of Northampton and other Institutions….. and Residents.

PAGE 30: Consultation on the Central Area Action Plan

Q31: Meeting Retail Capacity (Policy 14) – do we need a more up-to-date retail capacity study to ensure that this policy is up-to-date?

The question here is “has the Borough Council got the resources and expertise to deal with this issue?”

A policy is no good without a Vision, a Strategy and serious plans. Surely we should use our 2 MPs to get some central government attention to this issue of Northampton sliding down the Retail Ladder.

PAGE 31: Consultation on the Central Area Action Plan

Q32: Office and Business Uses (Policy 15) – this policy needs to be revised due to changes in Government policy. Should we identify land for new offices within the town centre? How should the Council seek to safeguard existing office space, especially in light of recent and proposed Government changes regarding permitted development rights?

WASPRA believe that our town centre requires a healthy balanced mix between the daytime and the nighttime experience. During the daytime, we need to attract commerce to to the town centre which will encourage the development of a dynamic ancillary business culture e.g. restaurants and fast food outlets for workers. An example of this might be that the town suffered when Barclaycard moved out. The reintroduction of the Angel Lane complex might repair this ill.

At nighttime, the town needs a vibrant, safe and popular entertainment culture which attracts residents and visitors as they move in to fill the void left by daytime commerce.

However, both need due consideration of the parking facilities and a re-focus on the Drinking Culture. In our opinion the 24 hour drinking hours experiment is fundamentally flawed.
Q33: Do any of the site specific policies need updating? Please indicate which policies and provide details if possible (Policies 18-35).
We have no comment here

Q34: Please provide details of any other policies in the Central Area Action Plan which you consider the Council should reassess to ensure that they are up-to-date, if possible providing evidence.

Our main fears here are directed at the flawed Bus Station concept and the furtherance of the mythical Grosvenor Centre improvements. The Train Station also needs further work regarding the accessibility and access policies. It is indeed a much improved Station but the disability access issue needs further attention. Why has there been no transport hub considered to encourage the wider use of 'Public Transport'. It was in our opinion, a mistake to omit a plan which brought together the Train and Bus Stations.
Q35: Do you have any comments on the Sustainability Appraisal Scoping Report? (Please identify the page, paragraph number(s), table or appendix within the Scoping Report to which each of your comments applies).

Housing: 1. Help make housing available and affordable
WASPRA questions the definition of affordable housing. There is no affordable housing in Buckton Fields East. Which member and Department in the Council monitors this provision. Developers can move their allocation to another of their developments, who keeps the register.

Use of the Car: 2. Improve Public Transport Services
How is it intended to improve the provision of public transport. Northampton now has a reduced bus station and no obvious joined up thinking, we have no bus and rail HUB, despite changes to both facilities. The Railway Station is not access friendly to the elderly, disabled, travellers with luggage and mums and dads with buggies. WASPRA contacted the Rail Users Group when it first opened with its comments. Another lift was promised, we have not yet checked that it materialised.

Access to schools: 3. Be within walking distance of schools
WASPRA cannot understand how this could be achieved. As a guess at least 30% of children are collected by car from our local primary. Some children from Buckton Fields will perhaps go to Boughton, not within walking distance.

Health: 4. Improve access to healthcare
With a failing NHS and longer and longer waits to get a GP appointment, to say nothing of an overstretched Hospital, we will be interested in specifics as to how this can be achieved especially with our increased population.

Northampton town: 7. Maintain the character of the Town Centre (WASPRA assumes this is the old character, not the current character)
WASPRA wonders when the author of this last visited the Town Centre. Pound shops, Pawn Shops, Cash converters, Charity Shops, a Nail Bar and a closed shop are all directly serviced by the expensive non-pedestrian area of Abington Street. Northampton is well known for its drinking culture. A 2013 newspaper article wrote a piece titled "Drunk and Disorderly in Britain" about the "gloriously incoherent" young men and women who dominate Northampton's high street after dark. This is a big Objective, one we would dearly love to be achieved but How please will it? Will the licencing hours be changed? WASPRA asks to see a list of priorities that will enable this Objective to be addressed. How is Northampton attracting retail companies. How is Northampton going to clean its backstreets. This situation is not improved by the quantity of Multiple Occupation Houses in the Borough, these houses tend not to be maintained. Excessive cars parked results in lack of street sweeping. Northampton has beautiful areas but we need more investment and more pride. The Cultural area and Guildhall are our role models. Protect Northampton's townscape: 10. Conserve the townscape (on the assumption that the townscape is in good shape)

Flooding: 14. Reduce the risk of flooding, avoid development of the flood plain
Waste: 16. Encourage recycling and avoid locating waste management facilities near sensitive areas
41 houses to be built on the Welford Road, in an area where water gathers after rainfall?? The 1998 event is a warning to Northampton and with the anticipated housing development to surround our Town, this is crucial to our Health and Safety.

How please? There are areas of our Townscape, Towcester Road bridge, that are shameful. Rubbish, overgrown shrubs, weeds, and generally filthy. We have no pride. How will this change and stay changed. One benefit of summer growth is that the majority of the rubbish is hidden.

WASPRA asks about the use of food bins. 84 houses in Fallow Walk, average of 19 food bins used. Houses may be composting but this is still a poor %. How is this to improve to avoid food and peelings going to landfill. Avoid locating waste management facilities near sensitive areas - St James, in the middle of town and residential areas? Please explain how approving this will meet your objective. We consider heavily residential areas to be sensitive.
Q36: Do you have any comments on the Draft Statement of Community Involvement?

WASPRA is absolutely 100% committed to community engagement. We live in areas where we feel disadvantaged with all the current developments and proposed developments which may not be on our doorstep but will affect the quality of life of our residents. Specifically increased traffic and difficulties accessing primary healthcare due to an ever increasing population.

We also abhor the standard of Northampton’s Housekeeping. In places Northampton is filthy with little parcels of flytipping in the town. The cleansing of the multi-storey car park at the top end of Abington Street (nr Sheinmans) is dreadful. The lift can be smelly, have spittal on the door and the buttons frankly insanitary. Most embarrassing if you are in the lift with a stranger to our town. The backstreets are badly in need of a clean. Community involvement should bring an element of pride back.

Community Involvement should focus on all the matter, including the crucial one of Planning
Q35: Do you have any comments on the Sustainability Appraisal Scoping Report? (Please identify the page, paragraph number(s), table or appendix within the Scoping Report to which each of your comments applies).

Favell Gospel Hall Trust welcomes the opportunity to comment on the SA Scoping Report. The Trust welcomes the recognition of NPPF core planning principles as summarised at paragraph 2.20. The references at paragraphs 2.21 to 'health, security, community and cultural infrastructure and other local facilities' is welcomed, together with the recognition of the voluntary and private sector (paragraph 2.22).

The Trust notes the social inclusion and deprivation data alongside the population data, which indicates a younger population, lower life expectancy and areas of deprivation. In response to these factors, the Trust suggests that the SA and in turn the emerging Local Plan should ensure adequate consideration of social and community infrastructure together with meaningful engagement with the voluntary and private sector, including local faith communities.

The SA scoping report records high crime levels but concludes that this is unlikely to be directly affected by the Local Plan. We support the identification of indirect influences on crime and fear of crime and urge that the SA ensures that adequate weight is given to such considerations ie economic, social and environmental impacts, to ensure that Northampton Borough progresses further towards a truly sustainable community.

For all these reasons, we suggest that Table 5.1 should be expanded to reflect the sentiments of NPPF paragraphs 70, 162 and 171 and expressly include references to the range of community facilities. The SA should also draw on the findings of the CAG Report 'Northampton Faith Communities Profile and Places of Worship Audit & Needs Assessment' which forms an important element of the Local Plan Evidence Base.

The SA may also usefully refer to 'Faith Groups and the Planning System': AHRC Faith and Place Network: October 2015.

PAGE 35: Consultation On The Draft Statement Of Community Involvement

Q36: Do you have any comments on the Draft Statement of Community Involvement?

Favell Gospel Hall Trust welcomes the opportunity to comment on the consultation draft SCI - 2016.

The Trust welcomes the commitment to effective and widespread community involvement and the expectation that local communities will be listened to and their views being given fair consideration. This is considered to be vitally important for 'hard-to-reach' groups, which includes parts of the voluntary and private sector, including local faith communities.

The Trust has welcomed the CAG Report 'Northampton Faith Communities Profile and Places of Worship Audit & Needs Assessment' but notes that the Trust and the Plymouth Brethren Christian Church appear to have been overlooked. Certainly PBCC churches are omitted from the report.

It is respectfully submitted that the SCI should therefore expressly commit to consultation with the General Consultation Bodies as set out in the 2012 Regulations which include representatives from local faith communities.