

## West Northamptonshire Emergent Joint Core Strategy

### Fitness for purpose

Aspects of core strategies	Requirements of core strategies	Commentary on the Emergent Core Strategy
<p><b>1. Strategic sites</b></p>	<p>Where core strategies allocate strategic sites, they <b>must</b> include a Submission Proposals Map’.</p>	<p><b>There is no competent Submission Proposals Map.</b></p> <p>The ‘Option 5’ proposal has been presented completely ‘out of the blue’ with no relationship to the 4 NIA option proposals that have been considered by the JPU in huge detail (three were 1500 responses), following a massive consultation exercise, but no useful evaluation of which has been presented in the public domain. Indeed the few indications of critical thinking that have been applied are scant in the ECS and are 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.</p> <p>The closest to a submission proposals map has been 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 (see below) history and evidence base.</p> <p>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.</p> <p>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 suits them rather than Brownfield and/or development north of the town), this has been seen by the JPU as their saviour.</p> <p>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</p>

		<p>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.</p> <p>Any submissions proposal map would need too to take 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.</p> <p>Any proposals in relation to Houghton and the S need to be seen in the context of the relationship of this area, outside the town, with Milton Keynes 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.</p> <p>It is imperative therefore that 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 MK and S. 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 MK and the SE (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.</p> <p>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 NIA 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.</p> <p>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</p>
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		<p>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).</p>
<p><b>2. Infrastructure</b></p>	<p>Core strategies need to be supported by evidence of the <b>physical, social and green infrastructure</b> needed to enable the amount of development proposed for the area. This evidence should cover: who will provide the infrastructure and when it will be provided. Infrastructure planning should also include the <b>specific infrastructure requirements</b> of any strategic sites which are allocated in it.</p>	<p><b>There is no evidence of the specific physical, social and green infrastructure needed to enable the amount development proposed for Northampton SE ‘option 5 proposal’.</b></p> <p>Please read the comments made in 1.</p> <p>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 – i.e. in addition to those given in 1 above - are given elsewhere below. These 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.</p> <p>The strategic approach to this 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:</p> <ul style="list-style-type: none"> <li>– 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</li> <li>– the whole of the Yardley Chase area and its estate hinterland including neighbouring villages on the hill above the river flood plain</li> <li>– the abutting parts of north west Bedfordshire and the northern tip of Buckinghamshire</li> </ul> <p>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</p>

		<p>as a cultural and environmental asset.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
<p><b>3. Consistency</b></p>	<p>Core strategies should be consistent with national policy (PPSs) and <b>in general conformity</b> with the regional plan.</p>	<p><b>This is not so with the Emergent Strategy.</b></p> <p>Quite apart from the logic of drawing up a core strategy when, at the same time, the Regional Plan is being reviewed, the policy is not consistent with the existing plan.</p> <p>The Regional Plan does not contemplate Northampton SE, ‘Option 5’, as a possible area for development let alone posit that it might be developed on a scale amounting to a ‘satellite town’. Rather it 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).</p> <p>Option 3 offered much greater hope of achieving this. More argument on this point is provided in 1 above.</p>
<p><b>4. Sustainable Community Strategy</b></p>	<p>Core Strategies should be aligned with the local Sustainable Community</p>	<p><b>The proposal is completely out of alignment with the Sustainable Community Strategy</b></p> <p>It is a wholly new proposal that has not been evaluated in any public sense with area stakeholders – see</p>

	Strategy.	<p>comments already made. It posits a wholly new direction for the development of Northampton.</p> <p>As the Sustainable Community Strategy forms the basis of the second Local Area Agreement, a document to which all the key area stakeholders (see comments in 9 below too) have become partners in a compact with central government, this is a major failing.</p> <p>As with the East Midlands Regional Plan (see 3) 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.</p>
<b>5. Justification of Core Strategies</b>	<p>Core strategies must be justifiable by being founded on a robust and credible evidence base; and be the most appropriate strategy when considered against the reasonable alternatives</p>	<p><b>To our understanding there is no such evidence base to support the proposal.</b></p> <p>Again, please see the comments above explaining the manner of imposition of this proposal <i>de novo</i>.</p> <p>The extent and magnitude of the 2007 Issues and Options consultation process was huge. This must have offered a massive evidence base on which to evaluate the 4 Northampton Implementation Area (NIA) alternatives both individually and in combination.</p> <p>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</p> <ul style="list-style-type: none"> <li>[1] the Houghton proposal</li> <li>[2] a new transport corridor with no linkage to the Local Transport Plan</li> <li>[3] an urban form compaction argument not presented before</li> </ul> <p>Also relevant here are the points made in 1-2 above about the need to consider <i>any</i> proposals (whether the 4 original NIA options or others) in the context of the wider framework of the MKSM Growth Area so as to consider the impacts of developments to the north and south and how these might affect the sustainability of the town's development.</p> <p>So in summary on this point, no evidence has been made available by way of the consultation process so far.</p> <p>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</p>

		<p>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 such evidence on either point. This aspect of the draft Strategy is entirely non compliant with the expectations of the strategic planning process.</p>
<p><b>6. Evidence Base</b></p>	<p>Evidence gathered should be;</p> <ul style="list-style-type: none"> <li>○ <b>proportionate to the job being undertaken</b> by the plan;</li> <li>○ relevant to the place in question and; as up-to-date as practical having regard to what may have changed since the evidence was collected.</li> <li>○ It should contain two elements: <ul style="list-style-type: none"> <li>● <b>Participation:</b> evidence of the views of the local community and others who have a stake in the future of the area.</li> <li>● <b>Research/ fact finding evidence</b> that the choices made by the plan are supported by the background facts.</li> </ul> </li> </ul>	<p><b>We have no confidence that adequate research has gone into the plan.</b></p> <p>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.</p> <p>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.</p> <p><b>The Option 5 proposal does not arise from views taken in public participation exercises.</b></p> <p>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.</p> <p>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 rational 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.</p> <p>We are entirely dissatisfied with the undemocratic manner of the imposition of this proposal. The original 'Issues</p>

		<p>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.</p> <p>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.</p> <p>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.</p> <p>There are areas where the evidence base is really critical too but is woefully deficient. The proposals are so out of alignment with area strategic planning as to be risible. Indeed by itself Option 5 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 was centripetal not centrifugal.</p> <p>Another obvious example of disconnection with area strategy is the roads proposal (not compliant with the 10 year area Transport Strategy which has no proposal for an orbital network extension) and flooding (no assessments of a huge potential risk to the flood plain proposed by the magnitude of development proposed).</p> <p>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</p>
<b>7. Alternatives</b>	A core strategy should be able to demonstrate that it is the most appropriate strategy when considered	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.

	<p>against reasonable alternatives. The writer must be able to show that they have looked at, and evaluated, reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they believe should be considered as part of the plan-making process. <b>'There is no point in inventing alternatives if they are not realistic'</b>.</p>	<p>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.</p> <p>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 argue above in 2 above.</p> <p>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.</p> <p>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.</p> <p>Secondly we continue to favour northerly expansion in line with option 3.</p>
<p><b>8. Effectiveness</b></p>	<p>Core strategies must be effective: this means they must be <b>deliverable</b>, flexible, and 'able to be monitored'.</p>	<p><b>See comments following</b></p>
<p><b>9. Deliverability</b></p>	<p>Core Strategies need to show how the vision, objectives and strategy for the area will be delivered and by whom, and when. <b>This includes making it clear how infrastructure which is</b></p>	<p><b>The plan does not make it clear how the infrastructure needed to support the strategy will be provided.</b></p> <p>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.</p> <p>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.</p>

	<p><b>needed to support the strategy will be provided</b> and ensuring that what is in the plan is consistent with other relevant plans and strategies relating to adjoining areas. This evidence should:</p> <ul style="list-style-type: none"> <li>• be based on sound infrastructure delivery</li> <li>• ensure that there are no regulatory or national policy barriers to the delivery of the strategy, such as threats to; protected wildlife sites (e.g. SSSIs) or landscapes or sites of historic or cultural importance (such as Scheduled Ancient Monuments etc).</li> <li>• ensure that partners who are essential to the delivery of the plan such as <b>landowners</b> and developers are signed up to it.</li> </ul> <p>Local Planning Authorities should be able</p>	<p>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.</p> <p>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</p> <p>Looking at the landscape put at risk. No comparative analysis has been made 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.</p> <p>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 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 WNDC 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.</p> <p>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 Npton SE.</p> <p>Likewise we do not expect Anglian Water to endorse the strategy. 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 Npton SE.</p> <p>The NRA 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.</p> <p>The Strategy is very defective on deliverability compliance.</p>
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	<p>to state clearly <b>who</b> is intended to implement different elements of the strategy and <b>when</b> this will happen; (These issues are handled through <b>early involvement of key stakeholders</b> in the preparation of options for the plan.) and be coherent with the core strategies prepared by neighbouring authorities, where cross boundary issues are relevant.</p>	
<b>10. Flexibility</b>	<p>A strategy is unlikely to be effective if it cannot deal with changing circumstances. Core strategies should last over a long time – 15 years usually but more if necessary (but see earlier note on reviews). In the arena of the built and natural environment many issues may change over this time. <b>Plans should be able to show how they will handle contingencies</b></p>	<p>The current position is a hugely changing set of circumstances.</p> <p>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.</p> <p>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.</p> <p>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. <b>Suggest we need here to decide our position relative to the NRA position on sharing development across communities</b></p>
<b>11. Monitoring</b>	<p>Core strategies must have clear arrangements for monitoring and</p>	<p>As stakeholders and consultees we have no faith in these arrangements.</p> <p>The way in which Option 5 has been foisted precipitately on our area with wholly inadequate supporting evidence</p>

	reporting results to the public and civic leaders.	is indicative of the attitude and culture of the JPU in relation to its communities/
<b>12. Sustainability Appraisal</b>	<p>A Sustainability Appraisal should be an appraisal of the economic, social and environmental sustainability of the plan and include the requirements of the European Directive on Strategic Environmental Assessment.</p> <p>The Sustainability Appraisal should perform a key role in providing a <b>sound evidence base</b> for the plan and form an <b>integrated part of the plan preparation process</b>. Sustainability Assessment should include the <b>evaluation of alternatives</b>. A Sustainability Assessment should provide a powerful means of proving to decision makers and the public that the plan is the most appropriate – <b>given reasonable alternatives</b>.</p>	<p>We are of the view that the development of Npton SE offers absolutely no guarantees in relation to the town.</p> <p>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.</p> <p>This will not improve the sustainability of Northampton. With the re-positioning of Junction 15, the new occupants of Npton 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.</p> <p>Presuming that Northampton can be regenerated simply by modest investment is naïve. 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.</p>
<b>13. Flood Risks</b>	Planning Policy Statement 25 (PPS 25) 'Development and Flood	WE have no faith and confidence that flood risk assessments and zoning have been carried out in the Northampton SE area

	<p>Risk' requires that local planning authorities adopt a risk-based approach to proposals for development in or affecting flood-risk areas. The assessment of risk should take account of the following areas: area liable to flooding; probability of it occurring, both now and over time; extent and standard of existing flood defences and their effectiveness over time; likely depth of flooding; rates of flow that are likely to be involved; likelihood of impacts on other areas, properties and habitats; effects of climate change; and nature and currently expected lifetime of the development proposed; and the extent to which it is designed to deal with flood risk</p>	<p>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, <b>it will require a new way of working</b> for all flood risk stakeholders in England and Wales. <b>This will bring new responsibilities and the need to develop a new paradigm for cooperative flood management.</b></p>