



Campaign to Protect
Rural England
NORTHAMPTONSHIRE

This is an extract of a letter sent by John Day RIBA, CPRE Technical Secretary for West Northamptonshire, to the West Northamptonshire Joint Planning Authority on 25 September 2009, as our response to the West Northamptonshire Emergent Joint Core Strategy Consultation.

Acting on behalf of CPRE West Northamptonshire I have duly studied the so-called 'emergent proposals' put forward and must express three specific very serious concerns. These specific concerns cause me to conclude the consultation as presented is flawed in its structure and content and thus quite simply should be withdrawn forthwith for re-appraisal.

In the first instance the East Midlands Regional Plan Options Consultation has been issued for public comment and the document includes various 'development options' for West Northamptonshire upon which opinions are sought. Of the four development options put forward, Option (2) specifically sets the focus for significant additional development at Northampton to create a much larger urban area. This appears to be the particular option favoured and promoted by the Joint Planning Unit.

In selecting Option (2) the Emergent Joint Core Strategy thus pre-empts the East Midlands Regional Plan Options Consultation, a situation that is totally unacceptable and clearly demonstrates a scant regard for public opinion at large. The consultation period for the East Midlands Regional Plan Options Consultation extends to 6 October 2009. The consultation period for the West Northamptonshire Emergent Joint Core Strategy was originally extended to 11 September 2009, and is now revised to 30 September 2009. Notwithstanding the extended consultation period, the arrangements make a complete mockery of a meaningful consultation process overall.

Clearly, the results of the East Midlands Regional Plan Options Consultation should be made known and decisions taken in that regard, most certainly prior to any decisions being made as regards the West Northamptonshire Joint Core Strategy.

Secondly, the very notion of presenting a consultation that puts forward a 'favoured option' and 'rejected options' and thence provides a questionnaire, clearly composed with a bias to the favoured option, is complete nonsense. All options as such should have been simply presented with the 'pros and cons' for each clearly set out and thence opinions duly sought with the opportunity given for members of the public to submit any unlisted alternatives for due consideration.

Each option as may be put forward should also include an Environmental Impact Assessment (EIA), including in particular as regards Northampton a full Strategic Flood Risk Assessment.

Thirdly I would note that in November 2004 a House of Lords Select Committee gave approval for the establishment of an Urban Development Corporation for West Northamptonshire (now known as the West Northamptonshire Development Corporation), this following petitions presented opposing the Order prepared by the Secretary of State.

The Development Corporation's designated area from the outset was delineated to include the entire urban areas of the three towns of Northampton, Daventry and Towcester and significant areas of undeveloped land - open countryside - beyond the existing built-up area of each town. The designated boundary for each town remains as originally proposed and approved and each designated boundary has legal status.

Whilst the concept of extensions into the open countryside was at the time opposed by CPRE ultimately it was accepted that, with the establishment of the WNDC, development in the open countryside included within the designated areas would result.

The Emergent Joint Core Strategy now issued for consultation simply ignores the designated boundary constraints as established and proposes major areas of development (urban extensions) into the open countryside

beyond the designated areas. Such development proposals affecting land beyond the designated boundaries are deemed totally unacceptable; most certainly any changes proposed must only be made following an extensive consultation process and full public inquiry into such.

Notwithstanding changes resulting in that part of the East Midlands Regional Plan 2009 which replaces Part 2 of the Milton Keynes South Midlands Regional Plan, development should simply be contained within the WNDC's established designated areas.

I would particularly question the notion promoted in the 'Vision Statement' of Northampton as a city. Northampton is the county town and notwithstanding the growth proposed within the Plan Period to 2026 one assumes should remain such. Any proposed change to city status would presumably be subject to popular consent, not simply to the ambitions of any small group of individuals seeking to exercise undue influence in this matter.

It is noted that the Joint Strategic Planning Committee is composed of elected members of Northampton Borough Council, Daventry and South Northants District Councils and Northamptonshire County Council, with WNDC representatives having simply an observer role to proceedings.

The WNDC was established specifically as a 'delivery vehicle' to ensure growth in the area and it was made clear at the outset that appointed board members must as a matter of principle be committed to secure growth in accordance with government targets. It would thus seem a serious conflict of interest potentially exists where a JSPC member is also a WNDC board member.

It is understood that three JSPC members are also WNDC board members!

A primary task of the Joint Strategic Planning Committee in the management of imposed growth targets is to have due regard to the views of the members respective electorates - made known, one would hope, via fair and sound consultation procedures.

Albeit the Emergent Joint Core Strategy is a document deemed to demonstrate present thinking but is not (to quote) a 'done deal', it is quite clear very specific policy directions are being actively promoted ahead of public comment. Indeed, specific policy directions appear to seek growth targets for the area that are beyond those deemed sought by the East Midlands Regional Plan.

Notwithstanding that assurances have been constantly given that the growth proposed will not be 'housing led', it is quite clear the provision of housing is the 'core element' of the strategy being promoted. No detailed analysis whatsoever is given in the consultation document as regards infrastructure requirements/ proposals, i.e. local services including schools, health care/hospital provisions and in particular utilities - and indeed funding provisions for such.

The housing numbers quoted in the consultation document it would seem in certain areas are less than correct. In any event figures beyond 2026 at this stage should simply be discounted as being beyond the Regional Plan Period (removing 15,173 units of housing accommodation listed for West Northamptonshire). Further, no details are given as regards completed housing developments or proposed housing developments for which planning approvals have already been granted. Without such evidence it is near impossible to give meaningful comment.

The 60% target for brownfield sites is not properly addressed - taking account of the fact that this is a national target reiterated in the Regional Plan. Regeneration is a core requirement of the development proposals for West Northamptonshire (particularly Northampton) and a serious approach to the redevelopment of brownfield sites will significantly reduce the need for the large scale urban extensions proposed in the favoured option by the Joint Planning Unit.

In general, I on behalf of CPRE West Northamptonshire consider a 'step change' is required in the strategic planning policy approach that begins to seriously address how exactly the growth requirements can be achieved within the approved designated areas and essentially confined to the approved designated areas.