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Planning Policy - Local Plan team

via email localplan@westnorthants.gov.uk

Dear Local Plan Team

Holcot Parish Council comments on Regulation 18 draft of West Northamptonshire Local Plan

Holcot Parish Council has considered the draft Local Plan. We see the new Local Plan as a massive opportunity for WNC to improve local planning, and generally improve the relationship of Parish Councils and communities with the planning process.

We have several general comments which we hope you will consider in preparing the regulation 19 draft, as well as comments on specific policies and sections of the text.

General comments

- **infrastructure must come ahead of the impacts.** Whilst the draft policies generally specify the need for developments to include infrastructure in their schemes, those policies shy away from making it mandatory for the infrastructure to be built before the impacts are felt by residents of the development and those in the surrounding area.
 - In Holcot we have long advocated that any large-scale development (for instance the nearby 3500-house Northampton North SUE) should be infrastructure-led. This means that infrastructure such as roads, schools, medical facilities, shops etc should be made available as an intrinsic part of any development, not afterwards.
 - For instance, the west-east route between Brixworth and the A43 through Holcot is the *de facto* northern ring road for Northampton. It is used by increasing and excessive traffic, and HGVs flouting the 7.5t regulations. Adding large scale development exacerbates this issue, adversely affecting people's lives. We have written to the Planners on this issue multiple times over recent years in response to consultations, with no resulting impact on plans. WNC and former councils have not taken any discernible action to ameliorate the impacts as they relate to Holcot, despite our warnings of those impacts.
 - With infrastructure-led development, issues such as ours would be prevented, and your objectives of enhancing lives met. Currently there is no sense of any joined-up strategic spatial options where infrastructure and development options are aligned - we hope that the Local Plan achieves that in its final version.

- Our view is that every development proposal should consider the impacts on existing communities, and how adverse impacts can be minimised and mitigated. It is not adequate to deal with these issues as they arise, as there is a real impact on people's lives, and ultimately costs of resolution that no party will wish or be able to incur.
- **road safety strategy and attendant policies should be a clearly defined part of the local plan.** Whilst draft policies ask developers to put pedestrians, cyclists etc at the top of the transport hierarchy, the draft Local Plan does not have policies related to road safety. A series of policies that specifies how road safety impacts arising from developments must be dealt with (not simply 'considered') would help ensure that the road safety impacts of developments are mitigated – but those impacts must be considered in broad geographic terms, not just inside the development. Similarly, the policies should consider how non-development related road safety issues should be resolved.

As alluded to above, Holcot parishioners' road safety is massively impacted by developments to the north of Northampton and the lack of alternative travel routes, but there have not been any measures put in place by WNC or developers to mitigate those impacts (except a small amount of Section 106 money that arrives too late and takes a long time to spend through Highways). Consistent with the recommendations in WNC's recent Peer Review, we would be pleased to help shape policies in this area – road safety is our Parish's number 1 priority.

- **Allocate a specific accountability for road safety, and develop a real-world strategy.** Similarly, as part of the Local Plan process WNC should consider which role(s) is accountable for road safety in the planning process and acts as the 'Authority'. That Authority could then maintain policy, ensure risks are mitigated etc.
- **A northern relief road.** Paragraph 13.6.14 refers to highway improvements to the north of Northampton - the text recognises the need "*to relieve existing settlements of the impacts of traffic*", but there is no policy to ensure that a scheme is brought forward promptly.

Massive building to the north of Northampton has exacerbated this problem as we predicted, with the lack of an adequate east-west route settlements such as Holcot have been living with the impacts of delayed infrastructure for years, and apparently years in the future. The local plan should define a policy in this respect, taking into account the views of communities in the 2017 consultations as a starting point. Also, any scheme and associated policies needs to ensure that the route does not lead to excessive building in open countryside.
- **Parish Council's and similar bodies should be a key consultee with other 'Authorities' and notice taken of their opinion.** The Local Plan has an opportunity to recognise Parish Councils as an 'authority' and Councils should be treated as such, using our local knowledge to determine practical and pragmatic planning views, versus technical and specialist planning experts.
- **Planners should consult widely, particularly on larger projects, considering the broadest implications.** The Local Plan is an opportunity to embed improved spatial 'awareness' in the planning process. For instance, Holcot was not consulted on an application for a large business/industrial park 2 miles away in Brixworth. However, with local knowledge and general consideration, planners should have realised that the transport impacts for Holcot could be substantial.
- **Investment in public transport.** There is no specific requirement brought forward through the Local Plan, despite the scale of potential developments.
- **Proposals for 2000 further houses at Moulton (policy N19).** The Policy proposing a development of a further 2,000 houses at Moulton neatly draws our comments together. The Policy must promote "*infrastructure first*", including a Northern orbital route and a new Moulton Medical Centre which have still not been provided despite substantial progress on NNSUE.

With the homes constructed and planned to be constructed along the A43 as part of the NNSUE, there is already massive pressure on infrastructure locally, and Holcot people's road safety. Adding a further 2000 houses on top of existing plans, without resolving these issues, would be irresponsible.

Specific comments on policies and other matters are provided as an attachment.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'D Walker'.

David Walker
Chair
Holcot Parish Council
07802 416704

Copied to:

Cllr Mike Warren - West Northamptonshire Ward Councillor, Moulton Ward

Holcot Parish Councillors

Holcot Parish Website

Attachment – comments on Policies and Plan text

Policy or Paragraph ref	Comment
2.3	Spatial objectives. We commented on these in 2021, and hoped that our comments would have resulted in improvements.
	Objectives 1-5 These objectives should overarch the other objectives – if these objectives cannot be met then a development or other activity should not go ahead.
	Objective 8 -The infrastructural needs should be prioritised - historic development has been that 'infrastructure catches-up'. A single, joined-up plan is needed.
	Objectives 8 and 9 - Don't focus on private transport (ie; roads) as the nirvana. Where roads are required, build them BEFORE the traffic arrives, not as an afterthought (eg; NNOR and Northampton North SUE). Existing communities such as Holcot are blighted because of poor planning. Spatial objectives should include provision for safer roads for all users.
	Objective 11 - In developing town centres, ensure that the transport modalities are built into plans.
	Objective 12 - 'Affordable' housing is critical for young people in particular - with an average wage of c£35k and average house price of c£200k(?), it is often impossible for people to either afford to buy or rent.
	Policy HO2 refers, but does it go far enough? Given the crisis in affordable homes the flexibility to specify a higher percentage as affordable housing should be a consideration.
PL1	This could be stronger. The requirement could be that every development must be, at a minimum, demonstrably net zero before planning approval is sought.
4.5	Air quality - with 5000+ house builds in the Moulton/Overstone area, the Northampton Air Quality Management area should extend to include that as part of the local plan process. Additionally, to demonstrate cohesive planning air quality management should be built into the Local Plan rather than as a separate strategy.
PL6	Placemaking puts cyclists, pedestrians etc at the top of the transport hierarchy inside a development. Clause (iv) regarding LTP etc is vague as it does not require a development and planners to consider the impact outside of the development.
PL6 and PL7	Similarly, the policies do not require developers or planners to think widely about a development - the impacts of a development knock-on to surrounding areas, if the infrastructure (including retail, health, roads...) is not in place before a development then those impacts are exacerbated.
PL11 and PL12	There is nothing in the policy that states 'and provide before the need arises', leaving a vacuum in the infrastructure which, in reality, may or may not ever be provided. Policies and contracts should enforce this.
N19	Land to west of A43 <ul style="list-style-type: none"> the impacts of this development on surrounding parishes are ignored in the policy the policy refers to 'make provision for appropriate infrastructure' - this is not the same as 'build the infrastructure'. The infrastructure required for the existing NNSUE has not been built, nor have impacts on Holcot been mitigated. the policy does not refer to the wider impact on local parishes (east-west route through Holcot etc) - it refers to the impact only on the A43
R1	re open countryside. Communities such as Holcot rely on this Policy. <ul style="list-style-type: none"> (iv) re exceptional design quality - what criteria are applied to determine exceptionality? (x) lorry parking - even taking the provisions of TR6 into account, why would the Local Plan promote large vehicles accessing rural communities?
EC5	re rural economy - "small-scale" is not defined in terms of its scale, impact or local benefit. There is a risk that a small-scale development would have a substantial impact on a community, without any equivalent benefit for that community.

Policy or Paragraph ref	Comment
13.4.2	Sustainable transport - the Local Plan should incorporate these plans, even by a cross-referenced table, to ensure a coherent sustainable transport plan. Evidence should be provided that the LTP and LCWIPs are integrated with the policies in the local plan, and developments must consider the impacts of the applicable transport-related plans. There is a risk that users of the Local Plan will not cross-refer to the LTP etc.
TR1	The policy fails to represent the road safety impacts on local communities where a modal shift from powered vehicles is not practical - for instance NNSUE has had a massive impact on traffic, and consequently road safety, in Holcot.
13.6.14	Regarding northern ring or relief road – please see comments in letter
14.1.1, IN1, IN2	<p>This statement regarding delivery of infrastructure in a 'timely manner' leads towards the crux of much of our existing issues.</p> <ul style="list-style-type: none"> • Policy IN1 fails to define in a 'timely manner' - infrastructure must be provided before the impacts of a development are felt, with impacts defined widely geographically and socially. • Policy IN2 fudges the issue - if a developer is able to demonstrate that they are unable to afford infrastructure then why would the Local Plan allow the impacts of the lack of local infrastructure to be felt by the local population.
15.5	<p>Implementation of monitoring - where other policies, plans etc are developed, how will the impact on the Local Plan be assessed and approved, and protections and policies contained in the Local Plan preserved?</p> <p>Also, any monitoring processes should be carried out independently of officers that are responsible for planning and other services covered by the Local Plan.</p>