



FAO Chris Burton
Planning Service, Place Directorate
West Northamptonshire Council

BY EMAIL ONLY

21st May 2024

Dear Sirs,

Application No. 2024/2138/MAO

Proposal Development of up to 361 market and affordable homes, and associated infrastructure, including open space, play space, landscaping, SuDs, and green infrastructure, and demolition of ruinous agricultural structure.

Outline, all matters reserved Location Northampton South Western Expansion

An application for development of up to 361 new homes is proposed by Vistry Latimer Collingtree LLP ("Vistry") on land bordering the M1, with East Hunsbury to the north and the railway to the west and is part of a larger development known as the Northampton South Sustainable Urban Extension ("NSSUE"). The land is already allocated for development in the Local Plan for Northampton. East Hunsbury Parish Council ("EHPC") are aware that the land is allocated for residential development within the Local Plan but there are issues which we consider need to be addressed for the development to proceed:

- Access
- Transport
- Air and Noise Pollution
- Health Provision
- Affordable/social housing
- Play provision/Community facilities
- Education
- Library Facilities
- Cycleways/footpaths

Our suggested mitigation measures appear in bold under each heading.

Access

The proposed access for the development is through the as yet unbuilt phase 2 of the NSSUE consented on the 22 December 2015 under reference N/2013/1035, either via Windingbrook Lane or a new road

to be constructed off a new roundabout on Rowtree Road adjoining Lichfield Drive. It is understood by EHPC that the application for this new road will be submitted to West Northants Council (“WNC”) in early 2024. It is noted from the consultation plan and a visit to the site itself that the land abuts the A43, but no access is shown off this road.

It is understood that there are two reasons for this.

1. The land over which access could be taken is owned by another company - there exists a potential access off the Towcester Road which is at present a dirt track. This would cross land adjoining the consultation site owned by SHOO22 Limited. EHPC is aware that this is a separate legal entity to Vistry but there are connections between the two companies – a person with significant control of SHOO22 Limited is Linden Limited who in turn are controlled by the Vistry Group of Companies. It is submitted that a “deal” could be done which would allow the necessary access to the subject land. Alternatively, a fresh access could be created off Towcester Road to access this development. The importance of this will be seen in section 2 – Transport, below.
2. Access would not be permitted under the railway – but what discussions have taken place with Network Rail which has led to this conclusion? There are plenty of examples of such access being permitted both nationally and locally, e.g. Ashton and Long Buckby. Indeed, such an arrangement already exists at another point along Towcester Road where it adjoins Rowtree Road.

There is already access onto the land via tunnels from Towcester Road. One of these tunnels has Wootton Brook running through it, but there are three alternative tunnels which could be used for vehicles and pedestrians.



Tunnel entrances – Western expansion site to Towcester Road

It is submitted that the question of access needs to be forensically investigated as the “easy option” of access through East Hunsbury, in particular Rowtree Road, will have a detrimental impact on existing and future residents.

Access from the development onto Towcester Road will reduce the impact on Rowtree Road and provide residents of the development with alternative routes.

We consider suitable mitigation measures to include:

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- **Transparent engagement by developers and West Northants Council with Network Rail**
- **Use of the tunnels as permanent access/egress for the NSSUE onto Towcester Road**
- **Suitable traffic calming measures to be installed on Towcester Road**

Transport

A traffic assessment was carried out in 2013 when Vistry applied for planning permission for the NSSUE, to assess the impact of the development on Rowtree road. EHPC would submit that this information is now out of date and not a true reflection of the position 10 years later. Since the NSSUE was consented there have been a number of residential and commercial developments constructed within the local area which impact upon East Hunsbury, in terms of noise and air pollution on the A45 (which is well documented), and the impact on the roads of the parish of East Hunsbury.

Rowtree Road is not only used by the residents of East Hunsbury at peak times to egress and ingress the estate but also as a “rat run” for residents of West Hunsbury, Hunsbury Hill and wider in order to try and avoid the congestion at the Queen Eleanor round-about. This is not just for traffic heading for junction 15 of the M1 but also for workers at the new warehouse/shed outlets e.g. Clipper. The problem will be further exacerbated when the SEGRO operation becomes fully functional, due to the increase in lorries movements (up to 6,000 per day), and the workforce travelling in the same direction.

Early morning cars are already backed up on Rowtree Road back as far as East Hunsbury Primary School, and in the evening backing up onto the A45 travelling west. Both issues causing a road safety concern and raise pollution levels through the parish.

Vehicles use East Hunsbury roads to avoid congestion between Junction 15 and 15a of the M1, and this causes significant issues for residents trying to go about their daily business.

As mentioned previously this is before the NSSUE is fully occupied. At the time of this letter occupation is approximately 1/5th.

Any incidents on the M1 or A45 force traffic through East Hunsbury causing congestion, and at key times (school drop off or pick up being a prime example), traffic comes to a standstill on Rowtree Road.

The Parish Council has considered both the Planning Statement and the Transport Assessment which accompanies the application and has the following observations:

1. Clause 3.10 states that the consultee response from the Local Highway Authority (LHA) “confirmed that the identified ‘trip rates’ are acceptable and no issues were raised with respect to highway impacts or wider transport matters”. Clause 6.10 goes onto state that “the increase in ‘trip’ generation caused by the proposals will have a negligible impact on the safety and capacity of the local highway network”. EHPC consider that these statements have been made ignoring other ongoing developments which will impact upon Rowtree Road, and the actual current position that affects Rowtree Road now.
2. On the ‘trip’ rate point the Transport Assessment at clause 5.2 deals with this and sets out the estimate of likely vehicle movements at peak hours being 0800-0900 and 1700-1800. The table at clause 5.2.5 suggests from 361 dwellings only 138 vehicles will depart during morning peak hours and that only 134 will return during afternoon peak hours. These numbers seem remarkably low given the location of the development and its proximity to areas of employment

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and schools. It is suggested that these statistics should be scrutinised by the Local Highway Authority to verify their accuracy. If the site were a town location where more journeys may be by cycle or on foot the statistics may be more realistic, but they do not seem accurate for an out-of-town development.

3. Clause 6.2.5 indicates that 4.9% of the residents will walk between 0800-0900. Whilst on the face of it this figure does not seem unusual, the location of the site makes it difficult to understand where 4.9% of residents are walking to. As mentioned above the proposed development is not near any areas of employment and nor is it particularly convenient for shops or schools within East Hunsbury itself. Further to put 4.9% into perspective 361 dwellings will generate approx. 1000 new residents meaning on that basis 49 residents will walk but only 138 residents i.e. 13.8% will use a vehicle. Again, EHPC would ask that the veracity of these statistics which are measured interchangeably and in different ways throughout the report are checked.

Suitable mitigation measures include:

- **Restrictions on HGVs using Rowtree Road**
- **Further road calming measures on Rowtree Road**
- **Pedestrian crossing at the Grangewood Park end of Rowtree Road to allow residents to cross safely.**
- **Suitable road calming measures on Hill Farm Rise**

Air and Noise Pollution

The proposed development raises significant concerns regarding both air and noise pollution, which are already notable issues within the local area, especially along the A45 and Rowtree Road. Increased traffic from the Collingtree Park development and this proposed extension is expected to exacerbate these problems, leading to higher levels of pollutants and noise, which can negatively impact the health and well-being of existing and future residents.

Given the significant concerns regarding air and noise pollution, it is imperative that the development includes robust mitigation measures to protect the health and well-being of the residents of East Hunsbury.

Air Pollution

Air pollution is a critical concern due to the anticipated increase in vehicle emissions, including non-exhaust emissions i.e. emissions that are caused by brake wear, tyre wear and road surface wear which exceed exhaust emissions. The addition of approximately 361 dwellings will result in more vehicular movements, leading to higher emissions of nitrogen oxides (NOx) and particulate matter (PM2.5 and PM10), which are harmful to human health.

Mitigation measures:

- **Implementing green infrastructure across the site, such as green roofs and walls, and expanding tree cover to help absorb pollutants and improve air quality.**
- **A tree planting scheme on areas where pollution may be highest, particularly Rowtree Road, the A45 corridor and M1.**
- **Installation of air quality monitoring stations.**

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Noise Pollution

Noise pollution is a significant issue expected to worsen with increased traffic flow. This can affect residents' quality of life, causing stress and potential health issues such as sleep disturbance and cardiovascular problems.

Mitigation measures should include:

- Installation of sound barriers or earth berms along major roads to reduce noise transmission to residential areas.
- Ensuring new buildings are equipped with soundproofing materials to mitigate indoor noise levels.
- Implementing measures such as speed humps, chicanes, and reduced speed limits on residential roads to decrease traffic noise.
- Limiting the times during which heavy goods vehicles (HGVs) can travel through East Hunsbury, especially during night-time.
- Resurfacing of Rowtree Road with noise-reducing materials.
- Introduction of speed reduction measures, such as lower speed limits and traffic calming installations, to decrease traffic noise and improve safety.

Electric Vehicle Charging

East Hunsbury is behind other parishes locally in respect of access to public fast vehicle charging points. There are currently four 7.5kW chargers located in Tesco Mereway car park, however, parking is limited to four hours, so the convenience of charging here is negligible.

There are no publicly available fast charging points in the parish.

Consideration should be given to:

- An area of publicly available fast charging points included within the development.
- Where terraces or flats are included within the plans provision should be made for a public parking area with fast charging points nearby, thereby avoiding the situation of cables across footpaths.

Public Transport

Presently, East Hunsbury is served by the no 12 and 12A bus service. The no 3 and no 88 service can be picked up from Tesco Mereway. There is no service available in the new development, but the assumption is that this will be in place when occupancy is at a level that makes the service viable.

In terms of transport links there will need to be in place a regular bus service. The NSSUE requires an hourly bus service be provided between the development and Northampton Town Centre, as per the Public Transport Service Level Agreement. It is submitted that in terms of the proposed site that the Public Transport Service Level Agreement should be extended to ensure that such bus service is cost effective for the residents and operates to include both Tesco Mereway (which will in turn provide a link to Danes Camp Leisure Centre) and the doctor/dentist surgeries on Rowtree Road.

Bus services in East Hunsbury have decreased significantly since covid, and do not provide a satisfactory service for residents.

We are well aware of the constraints on public bus services, but this does not detract from the need for residents to be able to easily reach doctors surgeries, the hospital, or workplaces. A reliable and comprehensive bus service will help to reduce residents' reliance on private vehicles, and ease some of the expected pressures on Rowtree Road.

If a public bus service cannot be guaranteed EHPC may find it necessary to explore the provision of a community bus service which will meet residents' expectations.

Suitable mitigation measures to include:

- **Meaningful engagement with bus companies to ensure a suitable service for residents from first occupation.**
- **Contribution to support a bus service across the development and the wider settlement of East Hunsbury.**
- **Provision of quality bus shelters with seating to be provided on the development. Living roofs should be considered as a way to support biodiversity, absorb rainwater and reduce surface water runoff.**
- **A sum provided to EHPC to set up a community bus service, with further sums committed to subsidise the service for at least 5 years.**

Health Provision

East Hunsbury has two doctors' surgeries - Danes Camp Medical Centre on Rowtree Road, and Penvale Park Medical Centre on Hardwick Road. Both surgeries cover a wide practice area which extends as far as St James' End and Upton on the West, and Great Houghton, Hackleton and Quinton on the East. The current facilities do not have capacity at present to deal with patient numbers and this is before the additional residents of the NSSUE are included.

The Section 106 Agreement for the NSSUE dated 22 December 2015 sought to address this at the time but is woefully inadequate - Schedule 1 clause 4 of the Section 106 Agreement essentially contains two provisions.

Firstly, it provides that prior to the 251st occupation a contribution of £621 per dwelling (it should be noted this relates only to phase 1 dwellings, there is no contribution for phase 2 dwellings) is paid to Danes Camp Surgery to "meet the needs directly arising as a result of the development ". The clauses do not provide any further guidance on what this means. The term is ambiguous, and in any event almost certainly does not mean the expansion of the surgery building itself as there is no physical space for such expansion to take place. This would have been obvious in 2015 when the Section 106 Agreement was entered into. In addition, the car park is already too small to cope, as evidenced by cars parking on Rowtree Road during surgery hours to the detriment of other road users and cyclists as cars park within the cycle lane.



Secondly, the Section 106 Agreement provides for a “Qualifying Healthcare Use” to be provided as part of the Local Centre to be built on phase 2 of the NSSUE. There is no indication as to the size of this health facility and indeed the definition of a “Qualifying Healthcare Use” pursuant to the Section 106 Agreement is wider than just a doctor’s surgery. It covers a dentists practice or “other similar medical use”, therefore the healthcare use could be a chiropodist, physiotherapist or similar. An example of this arrangement can be seen a couple of miles away in Wootton where the local centre has the Back and Body Clinic being a physiotherapist and separately a McTimoney chiropractor.

The Planning Statement at clause 6.116 is misleading regarding GP provision. Clause 6.116 notes that “uncertain impacts are identified with regard to GP provision and access to services” and goes onto state “however the site would benefit from the healthcare provision secured at the neighbouring NSSUE. This statement seems to have been generated by the Heath Impact Assessment submitted in support of the application, which at page 33 at point 7 which deals with GP practices, states that the “NSSUE includes provision of a healthcare facility”. Both these statements are incorrect. As stated above what the Section 106 Agreement does is provide for a “Qualifying Healthcare Use” which may be a GP surgery but may not. The decision on this will be for the developer (which may not be Vistry given they are not a developer of commercial buildings) of the Local Centre, and as stated may be some other healthcare use. The new development needs to cater for this eventuality and not rely on misleading statements.

As matters stand there is no proper medical facility to deal with the existing residents and proposed residents of Collingtree Park. An additional 361 dwellings in the Western Expansion results in another 1000 plus residents which exacerbates the problem further.

Based on the Danes Camp catchment area and the number of developments that have been approved in the last 5 years and those which are currently proposed, it is difficult to see how Danes Camp surgery will be able to accept many more patients from the Western Expansion. EHPC notes that the Health Impact Assessment indicates that Danes Camp Medical Centre only has 1 FTE GP to 1,208 patients whereas the recommended level is 1:1800. This will of course change with the additional 3000+ residents of Collingtree Park.

The dentist is a similar issue. At present Rowtree Dental Care in East Hunsbury is not accepting NHS patients (see table 5.1 on page 16 of the Health Impact Assessment) and has limited capacity for private patients. As with the doctors’ surgeries there is no additional land on which to expand the provision.

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This is before the NSSUE of 1000 dwellings of approximately 3000 residents let alone a further 1000 plus residents envisaged by the proposal.

The proposal does not deal with this, and the simple solution of a contribution does not assist without land/premises into which such contribution could be utilised.

On the basis that there is no guarantee that a doctors' surgery or dentist will be provided on Phase 2 of the NSSUE, EHPC believe that the only option is to provide a new medical centre, to incorporate a doctors, dentist, pharmacist and other healthcare providers, within the Western Expansion.

Affordable Housing

EHPC recognizes the need for affordable housing in its various forms and believes that social inclusion is required for a vibrant and inclusive community. In that regard EHPC would expect that a full allocation is therefore provided as part of the new development.

In addition, EHPC would expect the Planning Authority to require that the additional measures required to enable the affordable housing to operate successfully is also in place.

The proposed site is to some extent "rural". The key features of affordable housing are that they are near to schools (see further in the Education/School Section below) and employment opportunities. They should also be within easy reach of viable transport options and accessible to shopping and recreation. When you consider the points we have made on schools, health provision, public transport etc., these are all essential requirements for the affordable housing element of the development to work.

Potentially more affordable housing on the site could require more need for public transport, easy access to doctors' surgeries and other medical facilities, shops, and other community hubs.

- **Affordable housing should be evenly spaced across the development with community facilities being available and accessible to all residents.**
- **Affordable should not mean low quality, and there should be an emphasis on providing homes that residents are proud to live in and look after, which will extend to the local environment.**

Play and Community Facilities

It is noted that the proposal contains new public open space and a play area. The proposal does not state if this is an equipped play area, but we will make that assumption that it is. The developer will no doubt point to the new Community Centre and sports pitches to be built as part of the NSSUE as evidence that a play area is sufficient. The consultation wording, whilst indicating contributions to education, healthcare, and highways, does not mention any contributions to leisure directly.

In addition, it is submitted that the proposed site should also include a MUGA for the residents of the area. Whilst the NSSUE requires sports pitches to be provided as part of the development it is submitted that this is different to a more local area where children can meet to play football, basketball, and generally "hang out". An example of this already exists on East Hunsbury by Blackymore Community Centre and is a well-used facility providing an area for young people to meet and play as described above.

Knowing that there will be affordable housing on the site, EHPC believe that there will need to be more facilities nearby for residents – including services available at a fully functioning community building.

The community building proposed for the NSSUE will not be sufficient for need and a contribution towards the new community building should be provided which is at least equivalent to that in the Section 106 made for the NSSUE. This will support the expansion of the community building and the services it can provide.

The parish council believe that there will be a need for a larger, more functional, and flexible community building that serves the whole development.

Schools

The people of East Hunsbury are proud of our schools and the larger role that they play in our community outside of standard school hours. The concern that exists is the ability of the schools to cope with the influx of additional pupils and the impact that this may have on the quality of education and other activities that may be provided.

EHPC are aware that the Section 106 Agreement for the NSSUE contains provisions that require Vistry to identify an area of land upon which a primary school can be built (this area is shown on the consultation plan). However, the detail of when and indeed whether a school will be built is light. The Section 106 Agreement requires Vistry within 12 months of reserved matters approval to offer the site to the Council who then have 12 months to say whether or not they will build a school. If they do decide to do so there is no timescale for delivery.

Having considered the part of the Northampton Local Plan dealing with Education (page 122) the answer is no clearer. The section refers to a School Organisation Plan which covered a period to 2023 but nothing further (the School Organisation Plan is not on the Council website). Appendix G does show at E5 a two-form entry primary school as a proposed project. This shows an estimated cost of £7 million. Pursuant to the Section 106 Agreement for Collingtree Park Vistry will make a contribution to this of £5,400,000 (although this is returned to Vistry if not spent) meaning the balance will need to be found from other developments or Council funds.

Vistry refer in the consultation to a contribution to education provision. If that contribution is to assist with a new primary school, then this would make sense. If, however, there is no intention of building a new primary school then such contribution would need to be provided to East Hunsbury Primary School, Simon De Senlis Primary School, and Wootton Park School (primary phase).

This raises the question where the children from the proposed development and the NSSUE will fit into the school system. A development of 361 houses according to the Department of Education's own Dash Board, would generate about 85 children (25 primary school children per 100 dwellings). This is just from the proposed development. None of our local primary schools has any significant area of land that would allow for growth. EHPC are already aware of the significant traffic issues that concern residents at school drop off and pick up times, and any increase in pupils to existing schools would increase the traffic flow along Rowtree Road at peak times. All three schools are in part accessed off Rowtree Road (this particularly applies to East Hunsbury Primary School which adjoins the road).

There is likely to be a similar issue with secondary school age children and access to local schools. Wootton Park School, which is the nearest secondary education facility, is very popular locally and is

oversubscribed. Their catchment area is small, is likely will not extend as far as the NSSUE or the proposed Western Expansion.

Residents of the developments should be made aware that they may be provided with secondary school places at schools further afield.

- **Funding for suitable school bus services where required, for a minimum of 5 years after last occupancy.**
- **Transparency regarding the ability to obtain school places (primary and secondary) within the local area.**
- **Agreement that the primary school provision on the NSSUE will be delivered prior to first occupancy of the Western Expansion.**

Library Facilities

East Hunsbury has a well-attended library which operates as a traditional library but is also a community hub. Activities are available every day for residents of East Hunsbury and the surrounding areas. The library is operated by West Northamptonshire Council, and EHPC's parish office is located within the building.

Regular services available in the library space include Cuppa with a Copper, WNC community advisers, The Big Sing, and Welcoming Spaces (previously Warm Spaces). The range of things available to residents means that the library is a valuable resource.

EHPC would expect the Section 106 Agreement associated with the proposed development to make a contribution to the library facilities (it is noticeable that no contribution was requested for the NSSUE). This will allow the library to keep functioning as a resource for existing and new residents and expand its offering as a community hub.

Cycleways

WNC state that they have started to develop Local Cycling and Walking Infrastructure Plans (LCWIP) as part of a long-term approach to developing cycling and walking networks. The benefit of cycling is well known and promotes health and wellbeing. There was an attempt some years ago to provide a cycleway through part of East Hunsbury which can be seen on Rowtree Road, but the narrow width of the cycle lane and the new legislation surrounding vehicle distances for cyclists has made the cycle lane dangerous for both cyclists and motorists. As mentioned above the cycle lane is also parked in by visitors to the doctor's surgery which makes the cycle way unusable at this point (see photo above).

EHPC would hope that any proposed development would ensure that proper dedicated cycleways are provided (this would also help scooter users) to encourage more cycling and assist children to cycle to school and adults to cycle to work. Indeed, the Framework Travel Plan prepared by Peter Brett Associates for the Northampton South SUE dated April 2014 at page 25 envisages this being a "key principle" of any development.

The Western Expansion should include dedicated, fit for purpose, cycle ways that link the development as a whole, making travel around the development safe and enjoyable, and reduce the reliance on cars for short journeys.

Leisure

Danes Camp Leisure Centre (run by Trilogy) on East Hunsbury is a popular leisure centre, with one of only a handful of public swimming pools in Northampton. As well as a pool, the centre has a gym, sports hall for racket sports, and runs a variety of classes, including 50+ activity days, and a youth programme. Trilogy also deliver two youth club sessions at the Centre on a Tuesday evening, which are funded by the parish council.

EHPC would expect the S106 agreement to provide a contribution towards Danes Camp Leisure Centre, to enhance the services available at this Centre, and encourage membership from residents of the new development.

Ecology

The NSSUE Western Expansion proposal raises significant concerns about the loss of environment and ecology in the community, particularly coming on top of already extensive development. The proposed expansion will remove significant areas of farmland, disrupt wildlife habitats, and cause a decline in overall biodiversity.

Consideration should be given to:

- Establishment of wildlife corridors across the development, and preservation of existing hedgerow and trees.
- The incorporation of green infrastructure, including green/living roofs, parks and open spaces.
- Development of a “ready to go” allotment site, with an option to transfer to EHPC. There are no allotments available in East Hunsbury, and the nearest site on Mereway has a waiting list for plots. Allotments would contribute to creation of green space, promote healthy lifestyles and sustainability, and provide an area for educational opportunity and community engagement.

Procedural Point

Clause 3.9 of the Planning Statement states that Rebecca Grant (Planning Officer) has “consulted with the relevant consultees on the emerging proposals”. The land the subject of the planning application is within the boundaries of the parish of East Hunsbury, but EHPC has not been consulted with regard to the proposals despite this statement being made. This would appear to be a major oversight given the significance of the application.

Yours sincerely



Caroline Holgate
Clerk to the Council