



East Hunsbury
Parish Council

Planning Policy - Draft Local Plan
West Northamptonshire Council
The Guildhall
St Giles' Street
Northampton
NN1 1DE

30th May 2024

Draft Local Plan – Consultation Response

East Hunsbury Parish Council (EHPC) is pleased to have the opportunity to review the draft Local Plan and provide responses to the consultation. In view of the size of the document we have decided to focus on matters which are of particular relevance to this parish. This response is therefore divided into 2 sections. The first section will deal with the identified sites under Section 5 of the Local Plan entitled Making Great Places – Northampton, which EHPC believes will impact directly or indirectly on East Hunsbury. The Second Section will be a much broader response dealing with the other policies.

SECTION 1 - Impact On East Hunsbury From Proposed Developments

1. Policy N8 – Northampton, south of Junction 15 M1

The proposal for this area of land is for 68Ha of warehousing land. EHPC understands that WNC considers there is a need for additional warehouse space but would query whether the location and requirement is needed given the proximity of this land to the SEGRO development to the north of J15 and the scale of warehousing that is to be constructed on that land. WNC will be aware from Traffic Assessments carried out for the SEGRO development that the SEGRO development is expected to generate an additional 6000 lorry movements per day once fully operational, so additional warehousing of the scale envisaged will have a fairly similar effect.

EHPC consider that WNC is not considering the cumulative effect of the number of developments on the traffic using the A45 and the effect that this will have on public health. The cumulative additional vehicles are not just generated by the commercial developments but by the other developments consented at present e.g. Collingtree Park and Landimore Park but also those that are proposed by the Local Plan e.g. Hill Farm Rise (policy N17), land east of Wootton Fields (Policy N18), and The Green, Great Houghton (Policy N20).

The Local Plan takes no account of traffic or indeed transport other than self-driven vehicles. It is understood that there is a Transport and Traffic Initiative being drafted but is not available for consideration as part of the Local Plan process. EHPC considers this to demonstrate a lack of joined up thinking allowing for a hotch potch of developments with no adequate traffic/transport infrastructure in place.

2. Policy N17 – Hill Farm Rise, Hunsbury Hill

East Hunsbury Parish Council, Hunsbury Library, Overslade Close, Northampton NN4 0RZ
Tel: 01604 708429 Email: clerk@easthunsburyparishcouncil.gov.uk
www.easthunsburyparishcouncil.gov.uk

The site is inaccurately described in the Local Plan, as it is within the parish of East Hunsbury. Hunsbury Hill is a separate area in West Hunsbury located off the A5076.

The Policy correctly identifies that the site has a high presence of trees and wildlife and that this will need to be protected. What the Policy does not mention is that the area provides a “green lung” between the busy A43 and the dwellings on East Hunsbury. East Hunsbury already has 2 sides of the parish open to the road network with the A45 and Mereway dual carriageways and the loss of this land to development will further expose East Hunsbury to both noise and pollution.

Point vi of the Policy refers to improving connectivity to the Mereway Neighbourhood Centre, presumably by Tesco. It is difficult to see what is being improved as Hill Farm Rise leads directly to Tesco and there are no adjoining residential dwellings that would pass through the development, once built, to access this area. Again, taking into account the first paragraph of this point 2 EHPC would suggest that this policy is flawed as it mistakes where the site is actually located.

Further the additional dwellings will impact the traffic on Rowtree road which is already used as a “rat run” to access the M1 and A45. As per above there is a cumulative traffic effect that needs to be taken into account as there has recently been consent granted for 61 dwellings on East Hunsbury, with the Collingtree park development due to generate a further 800 dwellings in the next 5 years, plus the recent application submitted for 361 dwellings on land referred to as the Western Expansion. The traffic from these developments has only one access/egress point being Rowtree road. Consideration needs to be given to the validity of including this land as part of the Local Plan.

3. Policy N18 - Land East of Wootton Fields

Whilst this land is not within the East Hunsbury boundary it is considered by EHPC that this development will impact upon East Hunsbury for many of the reasons set out above with regard to traffic, noise and air quality.

The proposal is for approx. 2100 new dwellings and as per other Policies in this section reference is made to a Traffic Assessment being required as to the impact on the A45 and M1. As has also been mentioned it would seem prudent that as part of a Local Plan where traffic impact and transportation is referred to in numerous Policies, a requirement that an over-arching assessment is carried out as part of the Local Plan review so that more informed comment can be made as to the viability and impact of the proposed development sites.

4. Policy N20 – The Green, Great Houghton

As with Policy N18 this is not land within East Hunsbury, nevertheless it is considered by EHPC that this is another site which will have an impact of the quality of life for East Hunsbury residents due to the increase in traffic, noise and air quality generated by this proposed development. Councillors at EHPC attended the public exhibition held at Great Houghton and were not reassured by the responses given to queries with regard to traffic generation.

The indication was that this development will have little impact on the road network as it is anticipated that the residents will be employed on Brackmills. This is a very simplistic view. The reality is that the majority of residents will join the daily exodus to J15 of the M1 causing further congestion issues at the Queen Eleanor roundabout and the M1 itself, which as previously mentioned in this letter, will be subjected to a substantial increase in traffic generation from developments in progress (SEGRO, Land More Park, Collingtree Park to name but 3), let alone those proposed. It is noted that the Policy does not have any regard to these factors. Point iv refers to the impact of additional traffic but only in the context of land to the east of Great Houghton village.

5. Policy N6 - Re-allocated Sites

Two sites that are not specifically referred to in the Local Plan are land west of the Northampton South SUE and land to the west of Towcester Road.

In respect of the former an application has been submitted recently for 361 dwellings and EHPC have commented extensively on the planning application. The representations are similar and more detailed to the representations made here in respect of other proposed developments, and the same representations apply to the latter application west of Towcester Road. Both these applications add to the air quality, noise and traffic issues referred to above as well as impacting upon local services including the GP surgery and dentist.

SECTION 2 – General Comments Regarding Policies

Air Quality

The policy at chapter 4 of the Local Plan refers to at 4.5.4 the Council having declared eight 8 Air Quality Management Areas (AQMA). One of these areas according to the figure shown indicates such an area on the A45 between East Hunsbury and Wootton. It is the case, however, that The WNC Air Quality Action Plan Consultation proposes to remove what is referred to as AQMA5 as it is no longer considered that there is an air quality issue. EHPC and Wootton Parish Council have both commented on the flawed reasoning. The Local Plan designation of various developments which would increase traffic flow to the A45 increases the issue in this respect. What the Policy at 4.5.7 does not recognise is that various studies have identified that air quality is not simply an issue of exhaust emissions, but that significant emissions are caused by break wear, tyre wear, and road surface wear. EHPC consider it laudable that WNC are taking air quality seriously but in doing so it must also take it into account when considering planning applications, and the cumulative not the individual effect.

WNC needs to adopt a sequential test with regard to these matters similar to the process they would adopt in the case of flooding. It should not be the case that a development is not deemed to be an issue in terms of air quality within the boundaries of the planning application - the wider context needs to be considered. It is interesting to note that one of the aims of Policy PL9 is to “prevent negative impacts on residential amenity... from noise... vibration and air quality”. As stated above the proposed developments referred to do not seem to have had this consideration.

We do not believe the plan to be positively prepared or effective on the issue of **Air Quality** for these reasons.

Health and Wellbeing

EHPC supports WNC proposals in respect of health and wellbeing as it considers that the Policy is trying to address the root of the issues. We also believe that the proposals are reasonable and achievable. EHPC does however have a few observations.

Firstly, PL9 deals with Health Impact Assessments (HIA). The principle of this is accepted and agreed but the experience of EHPC with HIAs is not positive. Whilst we understand the fact that it is the developer seeking planning permission that prepares this, they need to be subject to greater scrutiny than simple acceptance of its contents. EHPC can provide an example of an HIA where matters stated as factually incorrect (potentially to the detriment of residents of East Hunsbury and the development concerned) are being used to guide a decision for planning to be granted.

Secondly, for any health and well-being strategy to be effective, the infrastructure needs to be in place. In this respect EHPC has in mind both local GP and other wellbeing services such as dentists, but also the wider provision.

Taking the GP situation first. East Hunsbury has a population of approximately 10,000 residents served by Danes Camp Medical Centre, and the population of East Hunsbury (simply based on the on-

going development at Collingtree Park) will increase by approximately 3,500 residents. In addition, the number of residents generated by the proposed future developments will add approximately 1200 further residents. None of the developments (including Collingtree Park despite what is publicly stated) provide for an additional surgery to cater for this additional population. Danes Camp Medical Centre would like to expand and provide additional services but due to limitations of space and parking are not able to do so and have been stymied in attempts to do so by WNC. If WNC is to make good on its stated aim in paragraph 14.2.13 of the Local Plan regarding increasing capacity, then more proactive and “out of the box” thinking is required.

Similarly, an issue with the dentist arises. The dentist on East Hunsbury is not taking any more patients which leaves open the question of where the additional residents are to seek treatment. Again, there is no requirement in any of the proposed developments to rectify this situation.

In terms of the wider issue, a common concern from residents is the situation at Northampton General Hospital (NGH). It is a common observation that the care is very good (if you can get it). The population of Northampton is increasing. The Local Plan at paragraph 1.6 puts this increase at 13.5% since 2011. In addition, the Local Plan indicates a further 39,150 dwellings during the Local Plan period which would suggest a minimum of an additional 100,000 residents (currently 425,725). Northampton, like many areas of the country, has an ageing population and the health infrastructure needs to increase and adapt to cater for this. EHPC is disappointed that there is little by way of proposals in the Local Plan regarding NGH. Indeed, it is noticeable that paragraph 14.3.5 provides a list of stakeholders with whom WNC has collaborated but whilst the list is stated to be non-exhaustive neither NGH nor the NHS are referred to. There is very little mention of NGH at all.

EHPC is of course aware of the overall national proposal for GP surgeries to offer greater services to reduce the burden on hospitals. EHPC can find no reference to this aim in the Local Plan. EHPC understands that Danes Camp Medical Centre could and would offer greater services if they had the parking space required to do so, but as stated above are thwarted in this objective.

Health and well-being are not just physical, but mental well-being too, and it is noticeable that there is no reference to libraries. East Hunsbury is in the fortunate position of having a library, but this needs investment to keep providing much valued services. These services include help for education, and provision of a community hub for all ages facilitating contact with other people, which is very important for mental health. It also offers a place for quiet and contemplation away from the stresses that may otherwise be encountered.

WNC has made comprehensive reference to outdoor and physical activities in Policies PL9-12, and it is therefore important that the Local Plan recognises the importance of library and similar facilities.

We do not believe the plan is effective on the issue of **Health and Wellbeing**.

Open Spaces

PL12PSID refers to the provision of open space and to a situation in paragraph B where if it is considered not appropriate to create an on-site open space then consideration be given to an off-site contribution. EHPC submits that this should be an exception, not the rule, so as to ensure that it ties in with Policy PL9 v which aims to promote “access for all to green spaces” and does not provide the developer with an “easy” way out. This applies to a number of contributions.

We do not believe the plan to be positively prepared on the issue of **Open Spaces**.

Transport

We have commented in Section 1 above with regard to transport and does not intend to repeat what has been said previously, save that EHPC believes that despite aims stated in policies very little regard

is had to the policies when it comes to the consideration of proposed developments both internal and external to East Hunsbury.

Paragraph 13.2.7 of the Local Plan refers to 6 priority areas, these include “green and clean” and “improved life chances “. These priorities need to be considered when looking at development proposals. The increase in traffic in the East Hunsbury from development on-going and proposed would suggest these have not been taken into consideration.

The Local Plan is not a document to be prepared, agreed, and stuck in a drawer. The document should be at the forefront of thinking when it comes to planning applications across all departments who have input. An example of such thinking is shown in a recent planning application submitted in relation to land in East Hunsbury where the impact of additional traffic is stated in the Transport Assessment to be “negligible”, such view being endorsed by the Highways department without consideration of the on-going and adjoining developments, and completely ignoring the stated additional 6000 transport movements generated by the SEGRO development (SEGRO’s own estimate).

We do not believe the plan to be positively prepared or effective on the issue of **Transport**.

EHPC does not submit this letter of representation to be negative, there are many positive policies and initiatives set out in the Local Plan which we would welcome. However, it does wish to highlight that there are issues such as noise, air quality, GP/hospital and other medical services, traffic generation, which are genuine and oft rehearsed concerns of residents and need to be considered and acted upon for the benefit of all - not the few.

EHPC accepts development is necessary but believes that development for development’s sake without the requisite tools for that development to be a quality place to live, stores up issues for the future. Policy N9 dealing with neighbourhood centres appears a step in the right direction, and larger applications currently being submitted should be encouraged in this regard.

In addition, EHPC has not commented on a number of issues as it considers that other areas are better placed to do so e.g. bus transportation, but it is nevertheless concerned with such matters and the impact on East Hunsbury.

In conclusion as stated our comments are not to be taken negatively, but residents are proud to live in East Hunsbury and EHPC want that to remain the case. The draft Local Plan contains policies which are aspirational but are not deliverable as the infrastructure is not in place. In addition, the Local Plan appears to be numbers driven in order to hit a target with little regard to how that impacts upon the current residents of Northampton.

Yours sincerely



Caroline Holgate
Clerk to the Council