

100
YEARS



Campaign to Protect
Rural England
Northamptonshire

The Wheatsheaf
Spring Hill Farm
Harborough Road
Pitsford
Northampton NN6 9AA

01604 780000
admin@cprenorthants.org.uk
www.cprenorthants.org.uk

Planning Policy – Draft Local Plan
West Northamptonshire Council
One Angel Square
Northampton
NN1 1ED

Email: Planningpolicyconsultation@westnorthants.gov.uk

Local Plan for West Northamptonshire

Consultation 2026

CPRE Submission dated 27 March 2026

CPRE Northamptonshire is a branch of CPRE, A national organisation representing over 40,000 people who share a concern for the protection of Rural England. These comments have been made collectively by the Technical Secretaries of CPRE Northamptonshire who have significant life experience in planning, business and economics.

We can be contacted via our Chairman Geoff.carverhill@cprenorthants.org.uk

Chairman's Statement

The preparation of the West Northamptonshire Local Plan is one of the most important planning exercises undertaken by the Council since the creation of the unitary authority. Once adopted, the Plan will guide the pattern of development across the area for many years and will have a lasting influence on the environment, economy and communities of West Northamptonshire.

The preparation of the Local Plan must be consistent with national planning policy. The National Planning Policy Framework (December 2024) requires Local Plans to be positively prepared, justified, effective and consistent with national policy. CPRE Northamptonshire's comments therefore focus on those areas where the draft Plan may require further evidence or policy refinement in order to meet these tests.

CPRE Northamptonshire welcomes the considerable work undertaken by the Council's planning policy team in preparing this draft Plan and recognises the effort required to develop a comprehensive spatial strategy for a large and diverse area. The Local Plan is an essential tool for managing change and ensuring that future development is properly planned and supported by appropriate infrastructure.

The decisions made through this Plan will shape the future of West Northamptonshire. New housing, employment sites and infrastructure will affect the countryside, towns and villages of the area for decades to come. It is therefore important that the Plan achieves the right balance between accommodating necessary development and protecting the environmental qualities that make the county a desirable place in which to live and work.

CPRE Northamptonshire supports the principle of a plan-led planning system and believes that a well-prepared Local Plan provides the best opportunity to ensure that development takes place in the most appropriate locations and in a manner that respects the character of the area.

Public consultation plays a vital role in this process. The Local Plan will only succeed if it reflects not only technical evidence and national planning policy but also the knowledge and experience of those who live and work in West Northamptonshire. Local residents, parish councils and community organisations have valuable insights into how development may affect their communities and landscapes.

CPRE Northamptonshire's comments are offered in a constructive spirit. Our intention is to assist the Council in strengthening the Plan so that it provides a robust framework for sustainable development while safeguarding the countryside and natural environment that are central to the character of the county.

In particular, CPRE Northamptonshire has focused its comments on those aspects of the Plan which have the greatest potential impact on the countryside, including:

- the scale and location of strategic employment development
- the protection of locally valued landscapes and rural settings
- the long-term role of agriculture and farmland within the county

- the cumulative impacts of development on rural communities and infrastructure.

West Northamptonshire contains a rich and distinctive countryside which contributes greatly to the quality of life of its residents and to the identity of the area. Protecting this resource while accommodating necessary growth is one of the central challenges of the Local Plan.

CPRE Northamptonshire hopes that the observations contained in this submission will assist the Council in refining the draft Plan so that it provides a sound and balanced strategy for the future of West Northamptonshire. In particular, CPRE Northamptonshire considers that further work would strengthen the Plan in the following areas.

1. Evidence Base and Infrastructure

The Local Plan should clearly demonstrate that the scale and distribution of development proposed can be supported by the necessary infrastructure.

In particular, CPRE Northamptonshire recommends that the Council ensure that:

- transport modelling fully reflects the cumulative impacts of development across the plan area
- infrastructure requirements associated with strategic allocations are clearly identified
- mitigation measures are realistic and deliverable within the plan period.

Ensuring that the evidence base is complete will help demonstrate that the Plan is capable of meeting the tests of soundness.

2. Strategic Employment and Logistics Development

West Northamptonshire is located within one of the most significant logistics corridors in England. While this presents economic opportunities, it also creates substantial pressures on the countryside and transport infrastructure.

CPRE Northamptonshire recommends that the Council carefully review:

- the overall scale of logistics and strategic employment allocations
- the cumulative landscape and environmental impacts of these developments
- the transport implications of increased freight movement across the area.

A balanced approach will ensure that economic development does not undermine the environmental qualities that make the area attractive for residents and businesses alike.

3. Countryside and Landscape Protection

The countryside of West Northamptonshire is a defining feature of the area and contributes significantly to its identity and quality of life.

CPRE Northamptonshire strongly supports the inclusion of policies relating to:

- Special Landscape Areas
- Green Wedges
- Green Infrastructure corridors.

However, it is important that these policies carry sufficient weight when determining the location of development. Landscape sensitivity and settlement separation should be treated as strategic considerations when identifying development sites.

4. Agricultural Land and Food Production

Agriculture remains an important part of the rural economy and landscape of West Northamptonshire.

The Local Plan would be strengthened by giving greater recognition to:

- the role of farming within the county
- the importance of productive agricultural land
- the long-term environmental and economic value of farmland.

Protecting productive agricultural land where possible will support both environmental sustainability and national food security objectives.

5. Cumulative Impacts of Development

Individual development proposals may appear acceptable when considered in isolation. However, the cumulative impact of multiple large developments can fundamentally alter the character of rural areas.

CPRE Northamptonshire therefore recommends that the Council give careful consideration to:

- the combined landscape impacts of strategic development
- the cumulative transport impacts of logistics growth
- the long-term effect of development on rural settlement character.

Taking a strategic view of cumulative impacts will help ensure that development remains consistent with the overall objectives of sustainable development.

Final Observations

In our final assessments we highlight those areas where we feel the local plan has not gone far enough or is actually already out of date. Of all these areas for further thought, the main issue, is the almost total lack of consideration of the problems of Farming in Northamptonshire. This is of utmost importance to the fundamental objectives of CPRE. Food security, the viability of farms, whether small, medium or large, whether tenanted or land owned, is a fundamental of the future of the English Countryside. The absence of these important considerations should cause the senior executives of WNC to consider carefully whether the plan is yet in a fit state to proceed to Section 19 status.

The Local Plan represents a significant opportunity to guide the future growth of West Northamptonshire in a positive and sustainable manner.

By strengthening the evidence base, carefully managing the scale and location of strategic development, and ensuring that countryside protection remains a central consideration, the Council can produce a Local Plan that provides a strong and durable framework for the future of West Northamptonshire.

CPRE Northamptonshire looks forward to continuing to engage constructively with the Council as the Local Plan progresses to the next stage of preparation.

Operational Summary of the detailed changes being proposed by CPRE Northamptonshire

Policy / Allocation	CPRE Position	Key Issue Identified	Requested Change	Page ref This document
Policy S1 – Spatial strategy	Support only after word change	Inappropriate carry forward of previous allocations. Lack of emphasis on brownfield development	Remove sections C and D. Insert new section G	15
Policy PL1 – Sustainable design and construction	Support only after word change	Omission of Rooftop Solar. More precise wording required for control purposes	Omission of Rooftop Solar. More precise wording required for control purposes	18
Policy PL2 – Sustainable retrofitting of buildings	Agree and support		None	20
Policy PL3 – Air quality	Support only after word change	More precise wording given	Reflect concerns in new wording	21
Policy PL4 – Low carbon and renewable energy schemes	Support only after word change	Inadequate reflection of damage done to farming and food security. Decommissioning inadequately handled	Reflect concerns in new wording	22
Policy PL5 – Flood risk and surface water management	Agree and support		None	23
Policy PL6 – Placemaking, design and amenity	Agree and support	There seems to be a bit missing at the beginning of the policy	Complete the policy or renumber	24
Policy PL7 – Neighbourhood	Agree and support		None	30

Development Plans and Orders, Design Codes and Village Design Statements				
Policy PL8 – Health and wellbeing – Health Impact Assessments	Agree and support		None	30
Policy PL9 – Healthy food choices	Agree and support		None	31
Policy PL10 – Community and sport facilities, playing pitches, open space and allotments	Agree and support		None	32
Policy PL11 – New sports provision	Agree and support		None	32
Policy PL12 – Provision of open space	Agree and support		None	n/a
Policy PL13 – Local Green Space	Agree and support		None	33
Policy N6 (xxvii) Land off Harlestone Road	Disagree and requires removal	Unacceptable merger of an historic Village with the urban expansion of Northampton	Delete the policy in so far as it affects Harlestone	34
Policy N6 (xxiii) South of Grange Park	Disagree and requires removal	Unacceptable merger of the historic village of Quinton with the urban expansion of Grange Park	Delete the whole policy	35
Policy N19 Northampton Collingtree Golf Course	Disagree and requires removal	Unacceptable merger of the historic village of Collingtree with the urban expansion of Northampton	Delete the whole policy	37

Policy N21 The Green Great Houghton	Disagree and requires removal	Unacceptable urban sprawl	Delete the whole policy	39
Policy R1 Primary Service Villages	Support only after word change	Inadequate emphasis on the qualities of the countryside of West Northamptonshire	Use the wording we suggest	44
Policy R2 Secondary Service Villages	Support only after word change	Five-year land supply should not be part of the policy	Use the wording we suggest	46
Policy R3 Other Villages	Support only after word change	Inadequate support to protect the scale and character of the countryside	Use the wording we suggest	47
Policy R5 Open Countryside	Support only after word change	Colour is critical to the countryside and is open to abuse if not specified	Use the wording we suggest	48
Policy R6 Rural areas housing requirements	Support only after word change	Preservation of settlement boundaries	Use the wording we suggest	50
Policy EC1 Employment land provision and affordable workspaces	Agree and support		None	53
Policy EC2 Supporting employment sites and economic development	Support only after word change	Not all sites allocated in previous plans should be carried forward automatically	Remove policies EC8 and EC9. Remove the words 'where possible' from section B	54
Policy EC8 Land at Furtho Pit	Disagree and requires removal	Unacceptable allocation made in a previous plan	Delete the whole policy	56
Policy EC9 Land at Shacks Barn	Disagree and requires removal	Unacceptable allocation made in previous plan making the site unviable for traffic	Delete the whole policy	58

Policy BN3 Non designated heritage assets	Support only after word change	Does not include historic parks and gardens	Use the wording we suggest	60
Policy BN9 Nature Conservation	Support only after word change	Mitigation of harms must be linked to the harm itself	Use the wording we suggest	61
The following feedback is of a more general nature: Note the page numbers refer to the Local plan, not this document				
Housing Requirement (Local Plan Chapter 6)	Support	Inconsistent presentation of housing figures and plan period (pp. 70–74)	Clarify and standardise headline housing numbers and plan period	
Rural Areas Strategy (Local Plan Chapter 9)	Support only after word change	Insufficient safeguards against cumulative countryside harm (pp. 210–224)	Strengthen tests for 'limited planned growth' and settlement protection	
Long Buckby Station – Policy LB1 (p.208)	Support only after word change	Open-ended expansion wording; incomplete transport evidence	Remove future expansion wording; require infrastructure-led delivery	
Strategic Logistics – Policies EC10, EC11, EC13 (pp.265–278)	Support only after word change	SA identifies significant adverse congestion impacts	Reassess scale/location; require deliverable mitigation	
Special Landscape Areas – Policy BN7 (pp.300–304)	Support	Policy not consistently applied to allocations	Explicit SLA compliance required in site policies	
Green Wedge – Policy BN8 (pp.305–307)	Support	Pressure from M1-related growth locations	Strengthen coalescence avoidance as primary constraint	
Green Infrastructure – Policies BN13 & BN14 (pp.318–324)	Support only after word change	Lack of delivery and long-term management clarity	Require funded 30-year GI management arrangements	
Overnight Lorry Parks – Policy TR6	Support only after word change	Reactive approach linked to logistics	Plan lorry parks strategically with cumulative need	

(pp.339–341)		growth	evidence	
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Chapter 1: Introduction

CPRE comments are intended to be constructive to the achievement of a publicly recognised plan for the area for the next 15 years. With this in mind CPRE has restricted its comments to four ‘banners’

- i. Approve and support**
- ii. Support only after redrafting**
- iii. Disagree and require removal**
- iv. No comment means that this is felt to be outside of CPRE’s remit to protect rural England.**

Where redrafting is seen as necessary CPRE has provided the replacement text that it would find acceptable.

It is easy to dismiss this version of the local plan as being driven by the December 2024 NPPF and its requirement for more new houses. It is however much more than that. It is a significant contribution to the wellbeing of West Northamptonshire by being a properly developed spatial strategy with a clear and understandable settlement hierarchy with development allocations. For this the team at West Northamptonshire Council are to be congratulated and have earned the respect of CPRE Northamptonshire, its members and the wider public.

In the following document CPRE will highlight those areas where we feel the unique aspects of Rural England are not adequately protected. We must consider whether the contents of the Plan adequately cover the problems foreseen in West Northamptonshire, particularly due to Traffic Volumes and Movements, Noise Pollution, emerging issues now presenting resulting from Climate Change, the rapidly developing conflict between Food Production and the siting of Solar Farms, the risks of damaging development on the Mental Health of the residents of the county. These concerns will be discussed in detail in the sections devoted to them in the plan.

The review of the local plan makes no mention or preference to the pre-existing agricultural activities of the county. Why this is outside the remit of the review is difficult to understand. Now faced with a crisis in food production in the UK this must be in direct conflict with proposed development that must inevitably fall on farming land outside village confines. (See National Food Strategy 2022 and recommendation 9 ‘Create a Rural Land Use Framework’ Document used In House of Commons Land Use change on Food security November 2025)

General Comment

Within the plan there are references to West Northamptonshire as an area achieving Net Zero. This is a very dangerous commitment to make and could result in the area being swamped with industrial scale renewables generation because we have energy intensive industries that serve more than just West Northamptonshire and we do not have a share of the offshore wind farms and nuclear power stations that provide zero carbon energy across the nation.

In particular West Northamptonshire is an energy intensive logistics hub and has substantial agricultural operations both of which serve well beyond the boundaries of the area.

The plan should change this commitment to say that West Northamptonshire will make its appropriate contribution to the national goal to meet Net Zero by 2050.

Chapter 2: Spatial Portrait, Vision and Objectives

Objective. 1- Environment.

Because West Northamptonshire is an energy intensive logistics hub it is likely to have great difficulty in achieving net zero in its own right because it bears carbon costs that serve other parts of the country. It would be better to frame this as West Northamptonshire making its appropriate contribution to meeting Net Zero. This might be mitigated if the many warehouses made full use of their potential to generate solar electricity, but this is likely to be insufficient to power their full operations requiring sustainable design and construction in all new development. This is very important.

Renewable and low-carbon energy in appropriate locations and at a scale that does not harm the character. This is critical as appropriate has to prevent damage to the locally valued his is critical as appropriate has to prevent damage to the locally valued landscapes and impact on food security.

Ensuring new development promotes use of sustainable travel modes or reduces need. Development can only be allowed to proceed as the provision of sustainable travel modes is made. Any development that adds need should be delayed until that need can be demonstrated that it has been satisfied by new sustainably means.

Objective. 2 – Green Infrastructure

This should not be seen as the result of development mitigation but must be planned and implemented in sympathy and integrated with the existing distinctive local landscape character.

Objective. 3 – Landscape

The scope here is too limited as it seems to only seek to protect and enhance areas that have been designated as SPA's. Northamptonshire is made up of locally valued landscape that impacts every view. All should be recognised and protected. The logical conclusion of this objective as currently written is a county of development with isolated SPAs in a few places. This would fail against other objectives in the Plan not least Objective 4 immediately following.

All of the expansionist policies conflict with the SA objective no 3 on maintaining biodiversity, flora and fauna, already compromised by existing decisions on new solar and wind farms with inevitable disruption to established habitats. This is also in conflict with policies 15a) and b) with the guarding of local water quality and management to minimise flooding

Objective. 15 - Specialist Business Development

Support for development of low carbon economy and technology is important and critical for the overall development of the county and to ensure that it does not develop only as a logistics hub.

West Northants face a difficult strategy to provide large scale developments whether industrial or in housing within a predominately rural county with a relatively low population of 439,349 (2023). There is a network of small compact communities with narrow high streets, and this large rural area is poorly connected by public transport and a disproportionately large network of minor roads that have suffered badly from potholes and poor maintenance. This makes the addition of additional housing difficult. There are technical impediments in the provision of better roads and infrastructure generally, including mitigation against flooding, the demand for more energy installations while retaining enough agricultural land in a recognised age of food insecurity for the UK.

The housing targets are debatable in a shrinking demographic for this county that will diminish in the stated planning period. Primary schools are struggling to fill places and the elderly population is increasing the burden on those of working age. CPRE have already commented on the paucity of small 2 bed dwellings needed for starter homes, downsizing or the more elderly. Instead, additional housing to many villages has been developer led with predominately 3-5 bedroomed homes. Our local observations therefore conflict with policy 10a) which ensures that local housing should meet local needs.

The Spatial Vision is important to CPRE. It is worth restating our formal objectives here:

are to promote and encourage for the benefit of the public the improvement and protection of the English countryside and in particular that of Northamptonshire and its towns and villages and the better development of the rural environment.

We are not stuck in the past and we take the future conditions very seriously in supporting both improvement and development.

So it is with some concern that we see within your vision, a view of the future that is based on what has happened in the past, continuing into the future.

Chapter 3: A Spatial Strategy for West Northamptonshire

The emphasis on development with the existing towns utilising unused or brown sites is very welcome and should be a key objective.

National planning policy requires Local Plans to provide for sufficient housing while ensuring that development contributes to sustainable patterns of growth. The spatial distribution of development should therefore take account of infrastructure capacity, environmental constraints and the need to protect valued landscapes and rural character.

National planning policy recognises the intrinsic character and beauty of the countryside and requires planning policies to contribute to and enhance the natural and local environment. Development in rural areas should therefore be carefully managed so that it does not erode landscape character or undermine the identity of rural settlements

Policy S1 – Spatial strategy (distribution of development)

WNC Policy S1 Spatial strategy (distribution of development)	CPRE View	Comments and suggestions
Housing and economic development will be distributed on the following basis		
A. Development will be concentrated primarily in the Principal Urban Area of Northampton through the regeneration of previously developed land and vacant or underutilised buildings. Limited, planned, peripheral growth will also be required to meet housing need in the plan period.	Agree and support	
B. Appropriate development of a lesser scale will be located in the Sub-Regional Centre of Daventry, where planned, peripheral growth is required to meet housing need in the plan period along with the regeneration of sites within the existing urban area.	Agree and support	Concerns about the risk of urban sprawl into genuine countryside as Daventry and Long Buckby Station increase in size
C. Within the Rural Service Centres of Brackley and Towcester the emphasis will be on existing planned growth in the West Northamptonshire Joint Core Strategy and Part 2 Plan, together with the regeneration of sites within the existing urban areas and further planned peripheral growth required to meeting housing need in the plan period.	Disagree and require removal	The South Northamptonshire local plan part two allocated farmland for industrial development inappropriately to the North of Towcester. This is an unfolding problem and needs to be properly debated.
D. Growth at Long Buckby Station – the emphasis will be on taking advantage of the opportunities that exist for sustainable travel and enhanced active travel connections to Daventry	Disagree and require removal	The outline policy in this plan is far too vague and should not be seen as allocated for planning purposes. Although Long Buckby has a station, it has very few services and is so not sustainable place to develop
E. In rural areas limited planned development is	Agree and	Needs protective wording to

<p>proposed for delivery through neighbourhood plans along with smaller scale development which is consistent with local needs will be supported with a particular emphasis on:</p> <ul style="list-style-type: none"> i. Enhancing and maintaining the vitality of rural communities and the services and facilities they provide. ii. Strengthening rural enterprise. iii. Promoting improved connectivity between settlements and their hinterlands; and iv. Protecting distinctive character and quality of rural settlements. 	support	very clearly restrict developers' excesses.
<p>F. In all cases growth will be directed towards the most sustainable locations in terms of access to services, employment opportunities, transport and the impact on the environment. Priority will be given to the regeneration of our urban areas making the best use of previously developed land and vacant or underutilised buildings.</p>	Agree and support	
<p>G NEW – In all cases, development will be directed towards brownfield sites and sites within the locally agreed settlement boundary</p>	Support only after word change	In all cases, development will be directed towards brownfield sites and sites within the locally agreed settlement boundary

Throughout the document CPRE urges WNC to ‘tighten’ its wording in its policies to avoid unscrupulous developers exploiting vague and unlimited concepts. Recent experience from the SNC LP2 proved time consuming and counterproductive leading to poor public trust in the planners and irresponsible misuse of public funding in defending ambiguous or imprecise wording. This mistake must not be repeated.

Chapter 4: Placemaking

All sub-sections under 4.2 are miss numbered as 4.3.1 etc.

4.3.5

Decarbonisation of all buildings must be promoted, recognising that the largest carbon impact from existing stock is heating and cooling.

Local generation of renewable energy – rooftop and over-car park solar should be recognised as a key component of this ahead of excessive agricultural land take for ground mounted.

4.3.6 It should be recognised that the biggest contribution to low carbon transport is an expansion of effective public transport. Active travel will only ever account for a small proportion of journeys within towns. Policies to achieve modal change should recognise this.

4.4.1 Whole life carbon assessments must be required for all developments, to be measured against best practice standards that require continuous improvement (reduction).

4.4.3 States that major developments would need a sustainability statement. This does not align with Policy PL1 that requires one for all developments.

4.4.3 New buildings (houses) to be 'Passive Haus' standard. This goes beyond current Building Regulations, but the Council must resist lobbying from the construction industry to reduce this standard. Without a step change like this progress towards net zero will fail.

4.4.7 All new development must be BREEAM Outstanding. There is no justification, now, for this to be argued down by lobbyists.

Policy PL4 – Sustainable Design and Construction

This is good and must be retained and not diluted by lobbyists.

4.7.1 This section should also add the introduction of rooftop solar as a realistic option ahead of ground mounted solar that consumes greenfield sites and removes land from the food economy. A priority order (hierarchy) of application should be introduced for renewable energy production.

4.7.4 Biomass – only if AQA is neutral or better. To achieve this a development would have to include effective filtration plant supported by monitoring and planned maintenance. Such a requirement must be included in the wording.

Policy PL4 – Is overall good however at B the wording is weak, and it should state that plans and financial support for decommissioning must be demonstrated before approval could be given. Not doing so could leave the Council with a contaminated brownfield site and the associated liability.

4.8.11 This section seems to imply that where a development cannot eliminate flood risk the risk and measures to mitigate it will be shared with the council in a 'collaborative' way. Surely this is not the intention and any developer must remain fully responsible for any flood risk that arises from the development proposals.

4.9.3 and .4 Design quality and Beauty

The sentiment set out here is good however there is no specific guidance for a developer that illustrates the form and style that would be suitable in this county. The council should include a

reference to the Northamptonshire Landscape Design Guide produced by CPRE is 2023. This would then align with the remainder of the points made in this section. A reference to this guide would also be appropriate in section 4.9.16.

Policy PL1.

WNC Policy PL1	CPRE View	Comments and suggestions
Sustainable Design and Construction		
A. All new residential and commercial developments that result in a net increase in homes or floorspace will be required to demonstrate how they have applied the energy hierarchy to contribute to meeting carbon net zero emissions targets by 2050. To achieve this:	Agree and support	
i. Applications must include a Sustainability Statement, which includes an Energy Use Intensity (EUI), or similar recognised energy use metric, figure for the development and which demonstrates the following:	Agree and support	
Reduce energy demand a) Building design that minimizes energy demand through passive design measures, including orientation, natural ventilation. b) Incorporates high-performance building fabric to reduce heating and cooling needs. c) Avoids unnecessary energy use through smart layout and compact form;	Agree and support	
Energy efficiency d) Uses energy-efficient systems and appliances, including LED lighting, EV charging from operation (as per standards set by Building Regulations), efficient HVAC systems. e) Integrates building management systems to monitor and optimise energy use. f) Meets or exceeds national building regulations for energy performance;	Agree and support	
Renewable and low-carbon energy g) Maximises on-site renewable energy generation, <u>including solar PV, solar thermal, heat pumps</u>); h) Considers district heating or shared energy systems where feasible; and i) Where on-site solutions are not viable, explore off-site renewable energy contributions ii. All proposals at operation will need to demonstrate the following standards as a minimum: a) No on-site use of fossil fuels.	Support only after word change	Add 'rooftop' to solar PV and thermal This must be tightly controlled so it cannot be used by Developers to offer questionable offsite mitigation or result in harmful renewables industrial scale developments.

<p>b) Space heating demand of less than 30kWh/m2/annum; c) Total operational energy use of less than 40 kWh/m2/annum; and</p> <p>iii. Applications for major residential and commercial schemes, including change of use or redevelopment of existing floorspace should also address how the proposal meets the following: a) Adaptation and resilience to climate change. b) Manages site waste. c) Uses sustainable materials. d) Can adapt / change the use of a building sustainably; and e) Uses initiatives such as living walls and sustainable drainage</p>		
<p>B. All new commercial developments should aim to meet the highest level of BREEAM or successor standards. Where developers cannot achieve the highest standards, they will need to demonstrate why.</p>	Support only after word change	Not meeting BREEAM outstanding should be exceptional
<p>C. The starting point for development is to reduce energy demand, create energy efficient developments and incorporate and maximise the use of renewable and low carbon energy sources to create a zero-carbon development. If the requirements of this policy cannot be met, the applicant must demonstrate why.</p>	Support only after word change	Whole life carbon assessments with operational monitoring to demonstrate compliance should be required for all industrial development
<p>D. Planning applications for employment uses must demonstrate that the proposal has achieved all BREEAM standard water efficiency measures. This may include the collection of rainwater for non-potable uses such as vehicle washing or to replace the need for potable water to be use for domestic type purposes such as toilet flushing.</p>	Agree and support	

Policy PL2.

WNC Policy PL2 Sustainable Retrofitting of buildings	CPRE View	Comments and suggestions
<p>Modern buildings A. Development proposals involving the retrofit of existing buildings will be supported where</p>	Agree and support	Change the wording of c) to replace “and” with “accompanied with” to avoid

<p>they:</p> <p>i. Improve the energy performance of the building, where appropriate to the condition of the building, through measures such as:</p> <ul style="list-style-type: none"> a) Installation of insulation (roof, wall, floor). b) Upgrading windows and doors to high-performance standards. c) Air tightness improvements and ventilation upgrades. <p>ii. Incorporate low and zero carbon technologies including:</p> <ul style="list-style-type: none"> a) Solar photovoltaic panels and solar thermal panels. b) Heat pumps (air source or ground source). c) Battery storage systems. d) Mechanical ventilation with heat recovery (MVHR). <p>iii. Use materials and methods that are compatible with the building's character, especially in conservation area or for listed buildings.</p> <p>iv. Avoid harm to heritage assets and demonstrate that retrofit measures are reversible or minimally invasive where appropriate.</p> <p>v. Minimise embodied carbon through demolition and the use of sustainable, local sourced, and low-impact materials.</p>		mould issues
<p>Traditional and historic buildings</p> <p>B. The retrofitting of energy efficiency measures and appropriate use of micro renewables in traditional and historic properties will be supported where:</p> <ul style="list-style-type: none"> i. They avoid compromising permeability, ventilation or structural stability; and ii. Damp and other maintenance issues that can increase the "cold feel" of the property have been addressed; and iii. It has been demonstrated that they are consistent with the energy hierarchy as set out in Policy PL1; and iv. They minimize harm to any heritage significance of the building. 	Agree and support	
<p>Designated assets</p> <p>C. The impact of such measures on the significance of a designated heritage asset and its setting will be assessed in the context of a whole building approach. Proposals will need to</p>	Agree and support	

demonstrate that: i. All simple and cost-effective measures that would avoid harm to the designated heritage asset and its setting have been fully considered and where appropriate implemented or included within the proposals. ii. Any secondary impacts on the heritage asset have been fully considered; and iii. The potential ease of reversibility of any proposals.		
D. Applications for the retrofitting of traditional and historic buildings should review the latest guidance from Historic England when preparing proposal.	Agree and support	

Policy PL3.

WNC Policy PL3 Air Quality	CPRE View	Comments and suggestions
A. All development is required to consider whether there will be an impact on local air quality and if this needs to be mitigated in the construction and post development phases.	Support only after word change	Planning should only be given to applications that set out how mitigation will be provided. Adding this as a condition risk's later arguments or appeasement when developers fail to fully comply
B. Where a development will introduce sensitive receptors into an area of poor air quality, an air quality assessment will need to be undertaken to establish the impact on the sensitive receptors and how this impact can be mitigated through development design.	Agree and support	
C. For all major developments, and developments involving biomass boilers, biomass or gas CHP an air quality assessment shall be undertaken that demonstrates that the development will be air quality neutral	Agree and support	
D. All development proposals should demonstrate how it proposes to reduce construction/demolition dust, reduces transport and plant emissions both in the operational and development phase, consider low emission travel and uses low emission heating and cooling systems	Agree and support	

Air Quality

Air quality management generally only seems to concentrate on Northampton and Towcester, but it is significant in tight street configurations in villages and as '45% are rural householders' (Chapter 2) a greater number are affected. Some monitoring of all A roads through villages should be incorporated.

There is a high proportion of asthma sufferers in Northamptonshire

Noise pollution seems to be omitted from the Local Plan, yet it is a major source of stress for householders in all towns and villages that have to cope with the high volume of commercial movement. If safe levels (of 70dB) are unobtainable after monitoring, re-routing of commercial vehicles could be considered. Although in Policy PL9 Health and well-being A iii, it deserves its own section of equal weighting with air quality.

Policy PL4.

WNC Policy PL4 – Low carbon and renewable energy schemes	CPRE View	Comments and suggestions
A. Proposals for large-scale renewable energy development will be supported where, with appropriate mitigation, they do not have an adverse impact on any of the following: <ol style="list-style-type: none"> i. Form, character and setting of an existing settlement. ii. Heritage assets including their setting. iii. Biodiversity and ecology. iv. Sports pitches and playing fields. v. The landscape including the cumulative impact with existing or approved renewable energy development. vi. Residential amenity including noise, air quality and shadow flicker. vii. The enjoyment of the open countryside including public rights of way; or viii. The operational capability of safeguarded Ministry of Defence sites and assets will be supported. 	Support only after word change	Large scale renewable energy – Solar PV in particular consumed large areas of farmland and has a disproportionate impact on local amenity, landscape integrity and the countryside. Mitigation should be considered as the current approach is to plant screening. This is often out of character to the local environment and takes time to be effective. Maintenance of any planned mitigation is also often omitted from development plans and planning approvals. iv) should also include glint and glare
B. Applicants should include details within their proposals on the expected lifetime of the scheme and how it will be decommissioned	Support only after word change	Decommissioning commitments, including funding and responsibility must be rigidly enforced and built into any planning approval. A mechanism for guaranteeing funding for decommissioning should be required.

Policy PL5 –

WNC Policy PL5 Flood risk and surface water management	CPRE View	Comments and suggestions
A. Applications for development of 1 hectare or	Support	

<p>above in flood zone 1 and for all development in flood zones 2, 3a or 3b must be accompanied by a flood risk assessment (FRA) that sets out the mitigation and resilience measures for the site meeting the requirements of the NPPF, Planning Practice Guidance, Environment Agency and Local Lead Flood Authority (LLFA) guidance. The FRA must assess flood risk across the life of the development taking environmental change and vulnerability of residents or users into account and consider all sources and forms of flooding or where other bodies have indicated that there may be drainage problems. The FRA should be agreed with the Council as LLFA and reference the Integrated Water Management Study (IWMS), which incorporates the Strategic Flood Risk Assessment (SFRA) for this Local Plan.</p>		
<p>B. A sequential approach will be applied to all development proposals to direct development to areas at the lowest probability of flooding unless it has met the requirements of the sequential and exception test Development must:</p> <ul style="list-style-type: none"> i. demonstrate that it provides wider sustainability benefits to the community that outweigh the flood risk; and ii. be accompanied by a site-specific flood risk assessment that demonstrates that the development will be safe for its lifetime without increasing flood risk elsewhere and where possible, reduce flood risk overall. 	Support	
<p>C. All major development proposals and proposals in areas identified as being at risk of surface water flooding will be required to manage surface water runoff and surface water flood risk via the use of sustainable Urban Drainage Systems (SUDs). Where flood risk management requires the use of sustainable drainage systems to manage surface water runoff, these should:</p> <ul style="list-style-type: none"> i. separate surface water from foul and combined sewers. ii. be accompanied by a long-term management and maintenance plan. iii. protect and enhance water quality by using appropriate treatments before discharging to the ground; and iv. Consider measures that allow multifunctionality of space and / or infrastructure. 	Support	
<p>D. Surface water attenuation should be provided</p>	Support	

to the design standard for the Upper Nene catchment (through Northampton and within the Nene catchment upstream of Northampton) i.e. the 0.5% probability (1 in 200 chance of occurring in any year) event plus climate change.		
E. For all development suitable access must be provided and maintained for water supply and drainage infrastructure.	Support	

Flood Risk

**Flood risk Assessments seem ambitious but weak. In CPRE we see a lot of desk-based reports/surveys of probability-e.g. likely occurrence in 100 yrs...
As climate change is causing an acceleration of events, there should be a recognition of proof of flooding from live /current data and not desk based evidence. This should be a requirement when there are contentious sites.**

Policy PL6.

WNC Policy PL6 Placemaking Design and Amenity	CPRE View	Comments and suggestions
C. All development must achieve the creation of high-quality, distinctive, sustainable and inclusive places that enhance local character, strengthen community identity, promote wellbeing, and respond sensitively to their context. Development must be safe and encourage social interaction, active lifestyles, and protect residential amenity.	Support	
D. All development proposals must demonstrate how they create successful places by addressing the characteristics of well-designed places identified in the National Design Guide or successor document and, where required by the local validation check list, be accompanied by a Design and Access Statement that demonstrates how the design responds positively to local context and character	Support	
Placemaking and design requirements Context - Enhancing the surroundings	Support	
E. Development proposals must demonstrate a thorough understanding of the site and its context through proportionate analysis. This should consider the site's physical, social, economic, environmental and historical characteristics, and explain how the design responds positively to these factors. Development must: i. Respond positively to local	Support	

<p>character, townscape and landscape setting and the pattern of existing development; ii. Respect the grain, scale and form of surrounding development while not preventing innovative or contemporary design solutions that enhance place quality; iii. Maintain the distinct identity and character of individual settlements and avoid coalescence, particularly in rural areas, and preserve important landscape breaks and strategic gaps between communities where these contribute significantly to settlement character and landscape setting; iv. Identify, protect and where possible enhance heritage assets and their settings 66 v. Protect and incorporate existing landscape features including trees, hedgerows, watercourses and natural assets; and vi. Retain, enhance and create important views and vistas into, out of and through the site, responding to topography and landform</p>		
<p>Identity - Attractive and distinctive</p>		
<p>F. Development proposals must establish or reinforce a clear sense of place with distinctive local identity. Places should be memorable, legible and recognisable, with their own character that responds to and enhances local distinctiveness. Development must: i. Create visually interesting and coherent street scenes and skylines that contribute positively to local character; ii. Use high-quality, durable, sustainable materials with colours, textures and detailing that complement the local palette; iii. Support design innovation and contemporary architecture where this enhances character, distinctiveness and environmental performance; iv. Be long-lasting, adaptable, and capable of responding to changing needs over time v. Promote site-specific, context-responsive designs that reflect and celebrate local identity, rather than standardised or generic approaches; vi. Create legible places with landmarks, corner features and visual cues that aid orientation; and vii. Incorporate public art, cultural references and locally significant features where appropriate;</p>	<p>Support</p>	
<p>Built form – Coherent pattern of development</p>		
<p>G. Development proposals must demonstrate that building heights, massing, scale and layout are appropriate to their context and contribute positively to the character and quality of the area. Development must: i. Respond to</p>	<p>Support</p>	

<p>prevailing building heights, roofscape and massing in the immediate area; ii. Consider the relationship to heritage assets, their settings and local landmarks; iii. Protect important views, vistas and visual connections; iv. Create appropriate enclosure and positive definition for streets and public spaces; v. Provide variety and rhythm in building lines, heights and roofscape to create visual interest; vi. Be of human scale at ground floor level to create comfortable, pedestrian-friendly environments; vii. Ensure building frontages positively address streets and public spaces with active frontages providing natural surveillance to create safe and active environment; viii. Provide clear distinction between public, private and semi-public space with appropriate boundary treatments or material change; and ix. Avoid blank walls and hostile fencing on frontages, instead incorporating active, attractive and well-detailed elevations and boundary treatments that enhance the 67 public realm</p>		
<p>Movement – Accessible and easy to move around</p>		
<p>–H. Development proposals must create well-connected, permeable movement networks that make it easy to access local services and facilities, integrate successfully with existing routes and desire lines, and prioritise sustainable transport modes. Proposals should also accord with the relevant policies in the Transport chapter. Development must: i. Avoid blank walls and hostile fencing on frontages, instead incorporating active, attractive and well-detailed elevations and boundary treatments that enhance the public realm; ii. Create permeable, legible network of streets and routes that prioritise walking, cycling, wheeling and public transport; iii. Demonstrate how it promotes active travel and supports Active Design principles to encourage physical activity and healthy lifestyles; iv. Provide safe, convenient and inclusive access for all users regardless of age, disability or mobility; v. Minimise barriers to movement and ensure routes are legible, direct and well connected; vi. Provide parking in accordance with adopted standards that is well-integrated into the overall design does not dominate the street scene; and vii. Include secure, convenient and accessible cycle storage and electric vehicle charging infrastructure in line with local validation</p>	<p>Support</p>	

requirements and adopted parking standards, ensuring that chargers are well-designed, accessible, and contribute positively to the public realm; and viii. Ensure servicing, waste management and deliveries can be accommodated without compromising street quality or pedestrian safety		
Nature – Enhanced and optimised		
I. Development proposals must integrate high-quality, multifunctional green and blue infrastructure that supports biodiversity, provides recreational opportunities, enhances climate resilience, improves health and wellbeing, and contributes to local character and sense of place.	Support	
Public Spaces – Safe, social and inclusive		
J. Development proposals must create attractive, high-quality public spaces that are safe, accessible, inclusive and encourage social interaction and community activity. Development must: i. Create human-scale, comfortable and inviting public space that are overlooked by active frontages; ii. Provide opportunities for a range of activities including play, recreation, social interaction and community events; iii. Incorporate flexible spaces that can accommodate different uses over time Provide 68 appropriate street furniture, lighting, signage and wayfinding that contributes to place quality: iv. Ensure spaces are accessible to all users including older people, families with children, and people with disabilities; v. Treat streets as high-quality public spaces with appropriate materials and landscaping; vi. Include opportunities for public art, cultural expression and community identity where appropriate; and vii. Incorporate clear boundaries between public and private space with appropriate treatment.	Support	
Uses - Mixed and integrated		
PL6 K. Development proposals must provide an appropriate mix of uses that support community vitality, generate activity throughout the day, provide local employment and services, and reduce the need to travel. Development must: i. Provide a mix of uses where appropriate to the development's scale and location; ii. Create active ground floor uses that animate streets and public spaces; iii. Support access to local services, facilities, employment and community amenities and iv. Incorporate opportunities for social interaction, community activities and civic life.	Support	

Homes and Buildings – Functional, healthy and sustainable		
L. Development proposals for residential development must provide homes and buildings that meet the needs of occupants, are functional, healthy, sustainable and adaptable to changing needs over time. Residential development must: i. Provide adequate private or communal amenity space that is functional, accessible and receives adequate sunlight; ii. Design adaptable homes that can respond to changing household needs over their lifetime; and iii. Provide adequate storage, including for bicycles, bins and recycling.	Support	There needs to be a requirement to ensure that the mix of housing types on a development satisfies local needs
M. All development must protect and enhance the amenity of existing and future occupiers by: i. Avoiding overlooking, overbearing impacts, noise, odour, vibration and overshadowing, loss of light or other harmful effects on residential amenity unless adequate mitigation measures are proposed and secured; ii. Providing adequate separation distances and privacy between habitable room windows; iii. Ensuring adequate daylight, sunlight, privacy and outlook for existing and future residents; iv. Providing sensitive, context-appropriate lighting schemes that complement the surrounding area and promote a safe and pleasant environment for both residents and wildlife; v. Providing well-designed and integrated waste and recycling storage that enhances the quality of the development and contributes positively to the street scene.	Support	
Backland and garden development		
N. Development involving backland sites or redevelopment of residential garden land will only be supported where it would not harm settlement character or neighbouring amenity, retains adequate useable garden space, and provides safe access and adequate parking.	Support	
Resources – Efficient and resilient		
O. Development proposals must demonstrate how they address climate change, minimize resource consumption, reduce carbon emissions and deliver environmental sustainability. Development must: i. Use low-carbon, sustainable materials where viable; ii. Use materials efficiently and specify durable materials that will weather well; and iii. Consider whole life carbon impacts including embodied carbon	Support	

Development on contaminated land must incorporate appropriate remediation that poses no risk to health or the environment	Support	
Lifespan – Made to last		
Q. Development proposals must demonstrate that buildings and spaces are designed to be adaptable, durable, resilient and well-maintained over their lifetime. Development must: i. Design buildings that can adapt to different uses and changing occupier needs; ii. Provide flexible internal layouts that can accommodate changing household sizes and working patterns; and iii. Use high-quality, durable materials and details that will age well	Support	

Is there a bit missing – it starts at C

Policy PL7.

4.2.1 On climate change, it is stated that the likely increase in temperatures is now 1 degree warmer than 1961–1990 average. Target 1.5 degree rise in temperature was clearly unobtainable as targets and pledges from the Paris agreement have not been met- leading now to an expected optimistic rise of 2.5 degrees but more likely 2.8 degrees. (From poll of 80% respondents from Intergovernmental Panel on climate change) Guardian 9.05.2024 and also stated by Prof Baltzer Univ Leicester 17.04.2024.

WNC Policy PL7 Neighbourhood Development Plans and Orders, Design Codes and Village Design Statements	CPRE View	Comments and suggestions
A. The Council will support and work with communities engaged in community-led planning activities including Neighbourhood Development Plans, Neighbourhood Development Orders, design codes and Village Design Statements	Support	
B. Neighbourhood Development Plans should contribute to the achievement of sustainable development and can include allocations for development. Neighbourhood Development Plans should contain policies to address identified local issues including key placemaking and design standards or codes to maintain and	Support	

enhance the vitality of rural community and to enhance local character and distinctiveness		
C. Policies in Neighbourhood Development Plans should not duplicate policies in this Local Plan and must be in general conformity with the strategic policies contained with the WNLP	Support	
D. All Neighbourhood Development Plans should include proposals for monitoring and review.	Support	

Policy PL8.

WNC Policy PL8 Health and wellbeing – Health Impact Assessments	CPRE View	Comments and suggestions
A. The health and wellbeing of communities will be maintained and improved. Major residential and commercial developments, or any development with significant population health impacts. will need to demonstrate, through an appropriate Health Impact Assessment, that they will contribute to creating an age friendly, healthy and equitable living environment and reducing health inequalities through: i. Creating an inclusive built and natural environment; ii. Promoting and facilitating active and healthy lifestyles through design and sustainable transport layouts; iii. Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality; 75 iv. v. Providing access for all to health and social care facilities; Promoting access for all to green spaces, sports facilities, play and recreation opportunities; and vi. Use of design tools such as Building for a Healthy Life.	Support	
B. The Council will support the provision of health facilities to accommodate primary and secondary needs in accessible locations, either on or off-site, which contribute towards health and wellbeing.	Support	

Policy PL9.

WNC Policy PL9 Healthy food choices	CPRE View	Comments and suggestions

<p>A. To improve the health of our residents and children, new hot food takeaways will only be supported where the following two tests are met:</p> <p>i. The proposed premises are more than 400m away from any pedestrian entrance to any existing or proposed 3–18-year-old education facility unless the takeaway is within a designated town centre; and ii. The Council supports the retention of existing, and provision of new allotments to encourage growing healthy food, physical exercise, improved mental health and recreation associated with maintaining allotments.</p>	Support	
<p>B. Space for food and farmers markets will be supported.</p>	Support	

Policy PL10.

<p>WNC Policy PL10 Community and sport facilities, playing pitches, open space and allotments Protecting existing facilities</p>	CPRE View	Comments and suggestions
<p>A. The Council will protect existing community facilities, including built sports facilities, playing pitches, public open spaces and allotments. Development that would result in their loss will be resisted and only be allowed where they can satisfy one of the following criteria: 78 79 i. The proposal would provide a compensatory replacement facility, open space or allotment of equal or better quality that is located in an accessible location; or ii. The proposal would bring about community benefits that outweigh the loss of the facility; or iii. There are sufficient alternative accessible facilities serving the same catchment area; or iv. The facility or open space has been identified in the most up-to-date sports facility strategy, playing pitch strategy, open space assessment, assets or estates strategy as surplus. Provision of new community facilities</p>	Support	
<p>B. The Council will support new community facilities including new development or changes of use provided that: i. It is well related to the community or settlement it serves; ii. It would not adversely affect the amenity of residents; iii. It is fit for purpose and is accessible for all visitors; and iv. It is in keeping with the surrounding area in terms of scale and</p>	Support	

character.		
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Policy PL11.

WNC Policy PL11 New sports provision	CPRE View	Comments and suggestions
A. All major residential development is required to provide new or upgraded sports provision either on or off-site through direct provision or contributions.	Support	
B. The quantum of sporting pitches and facilities, and their associated maintenance costs will be calculated using the Sport England calculator (or successor industry accepted methodology).	Support	

Policy PL13.

WNC Policy PL13 Local Green Space	CPRE View	Comments and suggestions
A. Development proposals, which would result in the loss of a Local Green Space defined on the policies map or that would have a harmful impact on the features which make it locally significant, will not be permitted unless very special circumstances can be demonstrated.	Support	
B. The only form of development considered appropriate within a Local Green Space is that which: i. Is ancillary to the use of the space or to any buildings on that land; and ii. Will enhance its beneficial use; and iii. Is appropriate in scale; and iv. Will contribute positively to the character and quality of the space, or v. Is specifically provided for in this plan (D7).	Support	

This policy should also reflect the Ministerial written statement "Solar and protecting our Food Security and Best and Most Versatile (BMV) Land" made on 15 May 2024 and include a further sub clause stressing the importance of minimising loss of productive or high-quality agricultural land. Where such land is incorporated into a scheme, there should be a requirement to demonstrate why it is necessary to do so and why poorer quality alternatives could not be used. The justification often cited by developers is that there is a Climate Emergency is not adequate as that does not trump all other considerations.

Chapter 5: Making Great Places – Northampton

The following proposed development areas have questionable merit:

N6 (xxvii) Land off Harlestone Road – this consumes green space and risks undermining the function of the Green Wedge and the integrity of the Northampton urban boundary

N6 (xxiii) South of Grange Park – this consumes green space that forms a buffer between Grange Park and the village of Quinton

N6 (xx) Collingtree Golf Course – This consumes green space that forms a buffer between Hunsbury and the village of Collingtree.

N6 (xxii) Great Houghton – Policy N21 sets requirements for traffic and Landscape views that will be hard to achieve and will need proper scrutiny by the council to ensure that they are met.

WNC Policy N6 (xxvii) Land off Harlestone Road

WNC Policy N6 (xxvii) Land off Harlestone Road. West of the A43 Site ref 5.10.34	CPRE View	Comments and suggestions
Land West of the A43 is allocated for residential development		
A. Proposals for this site must be informed by a Masterplan, agreed by the Council that must demonstrate how the site can come forward comprehensively.	Disagree and requires removal	
B. Proposals for this site will make provision for all of the following; i. Approximately 2,900 dwellings; ii. Development which is consistent with the diagram shown in Figure 12; iii. Appropriate education provision of a scale and form sufficient to meet the needs arising from the development; iv. A local centre, including appropriately scaled retail provision, community facilities and health-related uses; v. Open space and appropriate contribution towards leisure/sports provision; vi. Structural greenspace and wildlife corridors which retain important existing landscape 126 127 features including hedgerows, drainage corridors, woodlands and mature trees and include appropriate landscape enhancements in keeping with the Landscape Character Type; vii. Incorporate proposals to encourage cycling, walking and wheeling; taking advantage of the availability of active routes in the locality; viii. Provide for a gap between any development and Moulton village; and ix. Provide active travel links with the facilities in Moulton Village	Disagree and requires removal	Within this policy is a proposal for the development of about 100 homes and the amendment of the boundary of both the green wedge and the defined Northampton urban area. This will merge the historic village of Harlestone into the urban expansion of Northampton which is direct conflict with Policy N6 (Northampton Site Allocations) and BN9 (Nature Conservation)
C. Proposals for the site will be informed by	Disagree and	

assessments and suitable mitigation related to: i. Archaeological impact; ii. Heritage impact: addressing potential effects on the existing listed building or potential assets and the surrounding villages, including conservation area in Moulton Village; iii. Landscape and visual impact; iv. Ecological impact; v. Highways and transport including cumulative impact, of the scheme on the A43; vi. Flood Risk and water and water recycling infrastructure; and vii. Noise and Air Quality including the impacts of noise and pollution from the A43	requires removal	
D. Winter surveys shall be undertaken to determine whether the site is used by overwintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat.	Support	
E. Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water run-off.	Disagree and requires removal	
F. Any proposal for this site should be accompanied by a site-specific Flood Risk Assessment. Any proposal should also take into account the fact that the site is included within the Upper Nene Catchment Local standards for surface water drainage of 1 in 200 year plus an allowance for climate change to protect against pluvial flooding.	Disagree and requires removal	

WNC Policy N6 (xxiii) South of Grange Park

WNC Policy N6 (xxiii) South of Grange Park	CPRE View	Comments and suggestions
This area of development allows for a coalescence with Quinton by utilising a green buffer area. An existing Section 106 recognises and protects this buffer. Policy N22 – Northampton, South of Grange Park Site N22 is allocated for residential development	Disagree and requires removal	The S106 effectively makes this site undeliverable
–. A. Proposals for this site must be informed by a Masterplan agreed by the Council	Disagree and requires removal	
B. Proposals for this site will make provision for all of the following: i. Approximately 850 dwellings; ii. Development which is consistent with the diagram shown in Figure 18; iii.	Disagree and requires removal	

<p>Appropriate education provision of a scale and form sufficient to meet the needs arising from the development; iv. A local centre, including appropriately scaled retail provision, community facilities and health-related uses; v. Open space and appropriate contribution towards leisure/sports provision; vi. A sustainable and integrated transport network, incorporating safe and direct walking, wheeling, cycling and public transport routes, with strong connections to nearby neighbourhoods, the town centre and surrounding green corridors; vii. structural greenspace and wildlife corridors which retain important existing landscape features including hedgerows, drainage corridors, woodlands and mature trees and include appropriate landscape enhancements in keeping with the Landscape Character Type</p>		
<p>C. Proposals for the site will be informed by assessments and suitable mitigation related to: i. Archaeological impact; ii. Heritage impact: Demonstration that development preserves the rural setting of nearby historic villages, maintains separation between settlements, and protects locally valued views, including those experienced from Hackleton and Quinton; iii. Landscape and visual impact: A landscape-led masterplan responding to the undulating landform, incorporating substantial structural planting, safeguarding the 147 TPO woodland adjoining existing development, providing landscape buffers to the country park, and protecting key rural views. Development must avoid coalescence and reinforce the rural edge of Northampton; and iv. Ecological impact: Retention and enhancement of the TPO trees, hedgerows and the stream corridor, with biodiversity-led green infrastructure that delivers measurable Biodiversity Net Gain. Proposals must protect and enhance local ecological networks and create new habitats integrated into open space provision. v. Highways and transport: A transport assessment demonstrating safe access, capacity at key routes and junctions including Wootton Road, connection to the existing Grange Park residential area and M1 Junction 15. vi. Flood Risk and water and water recycling infrastructure: A strategy for the management of surface water flooding, utilising sustainable drainage systems that enhance the stream corridor, blue-green infrastructure and water</p>	<p>Disagree and requires removal</p>	

quality. Proposals must ensure adequate foul drainage and water recycling infrastructure is in place; and vii. Noise and air quality: including mitigation of noise and air quality impacts from the M1		
. D. Applications will need to consider <u>the impact of nearby industrial developments as well as</u> the recreational impact of the development on the Upper Nene Valley Gravel Pits Special Protection Area. Liaison with Natural England and the council will be required at the outset to establish the type of specific on-site open space that is required. This could include a Suitable Alternative Natural Greenspace (SANG) or Accessible High Quality Semi Natural Greenspace) or other agreed typology	Support only after word change	
E. Overwintering bird surveys will need to be undertaken to determine whether the site is used by overwintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat	Support	

WNC Policy N19 – Northampton, Collingtree Golf Course

WNC Policy N19 – Northampton, Collingtree Golf Course	CPRE View	Comments and suggestions
Site N19 is allocated for residential development		
A. Proposals for this site must be informed by a Masterplan agreed by the Council that must demonstrate how the site can come forward comprehensively	Disagree and requires removal	
B. Proposals for this site will make provision for all of the following: i. Approximately 300 dwellings; ii. Development which is consistent with the diagram shown in Figure 15; iii. Appropriate infrastructure including education provision; iv. A sustainable and integrated transport network, incorporating safe and direct walking, wheeling, cycling and public transport routes, with strong connections to nearby neighbourhoods, the town centre and surrounding green corridors; and v. A comprehensive green and blue infrastructure network, retaining and enhancing the Wootton Brook corridor, Local Wildlife Site, existing hedgerows, trees and wet grassland, together with structural green space and wildlife corridors that integrate with the wider Northampton South	Disagree and requires removal	

SUE; and		
C. Proposals for site will be informed by assessments and suitable mitigation related to: 136 i. A heritage and archaeological assessment; ii. Landscape and visual impact: A landscape impact assessment (LVIA), informing site layout, structural planting, and measures to minimise visual intrusion. Development must retain and reinforce existing strong boundary features to limit wider visual impacts and ensure that new built form integrates effectively with the surrounding landscape character especially Collingtree village; iii. Ecological impact: An Ecological Impact Assessment identifying the site's habitats, species and ecological connectivity, including the section of the Wootton Brook and associated grassland designated as a Local Wildlife Site; iv. Highways and Transport: A Transport Assessment and Travel Plan demonstrating safe and suitable access for all users, and capacity at key routes and junctions. This includes A45, Junction 15 of M1, Windingbrook Lane and Rowtree Road; v. Flood Risk and water and water recycling infrastructure: A site-specific flood risk assessment and management measures, including sustainable drainage system and opportunities for natural flood management along the Wootton Brook corridor, addressing surface water, fluvial risk and any risk from other sources; and vi. Noise and Air Quality: including noise and air quality impacts arising from the M1, A45 and local road network.	Disagree and requires removal	
D. Applications will need to consider the impact of nearby industrial development as well as the recreational impact of the development on the Upper Nene Valley Gravel Pits Special Protection Area . Liaison with Natural England and the council will be required at the outset to establish the type of specific on-site open space that is required. This could include a Suitable Alternative Natural Greenspace (SANG) or Accessible High Quality Semi Natural Greenspace) or another agreed typology	Support only after word change	

WNC Policy N21 – Northampton, The Green, Great Houghton

WNC Policy N21 – Northampton, The Green, Great Houghton	CPRE View	Comments and suggestions
A. Residential development of about 650 dwellings will be supported at The Green, Great	Disagree and requires	

<p>Houghton, subject to the following criteria being met: i. Winter surveys being undertaken to determine whether the site is used by overwintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat; ii. Development must adhere to Policy BN15 of this Plan, in particular with reference to 141 142 recreational disturbance and functionally linked land associated with the Upper Nene Valley Gravel Pits Special Protection Area; iii. Schemes should be of high-quality design and must take into account and be sensitive to the significance and the setting of the Great Houghton Conservation Area, evident through a Heritage Impact Assessment; iv. Proposals should include suitable measures to mitigate the impact of additional traffic generated by the development. The principal access to the site should be from The Green west of Saucebridge Farm, west of the junction of The Green with the unnamed road which leads south at this point, and the development should seek to minimise additional traffic eastwards from this point towards Great Houghton village and the Bedford Road. The intention should be to reduce the potential for traffic use to use The Green to the east or routes through the allocation to travel between the Newport Pagnell Road and the Bedford Road or vice versa; v. Proposals will be informed by air quality and noise impact assessments due to proximity to the Brackmills Industrial Estate; vi. Applications on the site will need to be accompanied by an archaeological assessment that considers any archaeological potential on the site; vii. Proposals must be accompanied by a landscape vision for the site including details of how views across the site into and out of the village of Great Houghton will be managed, especially views of the Grade II* listed church. The location and layout of the SANG must assist in achieving the landscape vision for the site; viii. The safeguarding of suitable access for the maintenance of foul drainage infrastructure is maintained; ix. A Suitable Alternative Natural Greenspace (SANG) will be secured; and x. Proposals must be informed by a masterplan for the whole allocation which will be expected to: a. Take into</p>	<p>removal</p>	
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<p>consideration the surrounding townscape character and remain sensitive to the existing small-scale residential development within Great Houghton to the east and Hardingstone to the west; b. Provide suitable transport links to neighbouring developments, including neighbourhood centres and facilities; c. Manage and control vehicular access to and from the site to the northern / eastern section of The Green near to the village of Great Houghton, and minimise traffic arising from the development passing through Great Houghton; and d. Connect the site to nearby Brackmills Country Park and surrounding areas including pedestrian and cycling provision to secure connectivity and permeability within the site, to the employment area to the north, the proposed residential areas to the west along The Green and towards Great Houghton as shown on Figure N4</p>		
<p>; B. Provide a SANG within the area identified in Figure N4 which provides the following: i. Protection, enhancement and / or creation of habitats in line with other policies of this Plan; ii. Accessibility for residents' recreation including an off-lead dog walking area; iii. A circular walking route around the SANG and eastern development area 143 iv. A clear separation between the developed site and the village of Great Houghton in order to protect its setting and the heritage assets of the village; v. Formal and informal open space; vi. A SANG car park; vii. If any part of the SANG is proposed off-site, the SANG will need to be adjoining the site; and viii. Ensure built development (other than as may relate to recreation and SANG functions) only takes place outside the SANG, the broad location of which is defined in Figure 17</p>	<p>Disagree and requires removal</p>	
<p>C. Subject to detailed assessment (including assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDs) to reduce the rate of surface water run-off.</p>	<p>Disagree and requires removal</p>	
<p>D. Proposals for this site should be accompanied by a site-specific Flood Risk Assessment meeting the design standard for the Upper Nene catchment through Northampton of a 0.5% probability (1 in 200 chance of occurring in any given year) event plus an allowance for climate change to protect against fluvial flooding. Surface water attenuation should be provided up to this standard</p>	<p>Disagree and requires removal</p>	

Chapter 6: Making Great Places: Daventry

No comments in this section

Chapter 7: Making Great Places: Brackley

No comments in this section

Chapter 8: Making Great Places: Towcester

No comments in this section

Chapter 9: Making Great Places – Growth at Long Buckby Station

2.1.16 The presence of a station does not necessarily mean that expanded development would be sustainable. The test of sustainability can only be made when the location, type and scale of development is known, and suitable public transport and active travel infrastructure is in place and effective.

The proposed development area titles Long Buckby Station is in effect a new town as it does not integrate with the existing town and is unlikely to contribute much to support businesses in the town centre given the distances involved. Even the station is over 400m ('walking distance' set out elsewhere in the Plan) from the station. Long Buckby has limited services and amenities and so the development would significantly contribute to car use and will create a dormitory suburb. The development contributes to a coalescence of housing joining Long Buckby to Daventry – seemingly a goal, that does not support the current character of the town and landscape setting.

CPRE recognises the sustainability benefits of locating development near rail infrastructure and supports the principle of transit-oriented development. However, the allocation of approximately 1,000 dwellings at Long Buckby Station raises significant concerns.

The Plan explicitly states that there may be opportunities to extend this growth location in future local plans. This creates an open-ended expansion risk that is incompatible with effective countryside protection. In addition, transport impacts are acknowledged as requiring further assessment.

CPRE requests that the Plan removes or tightly constrains references to future expansion and strengthens requirements relating to landscape capacity, infrastructure delivery, and settlement separation.

Chapter 10: Making Great Places: Rural Areas

Confining development in villages within the existing area is welcome. Any development in villages should be defined by local plans. Policies R1 to 4 are generally good and should seek to ensure that development fits the needs of the village and is in keeping with the existing character and scale.

Policy R5 seems to focus on housing but should focus equally on constraining industrial development that is not related to existing village settlement and can have a huge impact on the character and vale of local landscapes.

Policy R6 emphasises that any housing development must be Plan Led referencing neighbourhood or local plans. This is a fundamental requirement. The restriction should also constrain industrial development. The Policy does not say what happens if the neighbourhood or local plan developed at Parish level cannot identify sites for the defined number of houses either because there is no identified local need or simply because there are no suitable sites.

There is a large section devoted to the mapping of all village confines which show very few proposed alterations to the existing ones. Although development and Policy 10.5.1 imposes additional numbers of houses in Policy R6 to be provided within all village confines, this is not physically possible, so this demand immediately leads to the conflicting Policy R2 which gives 'strict' criteria for development outside the village confines. One example of this is in Long Buckby where a massive new allocation of 1,000 homes is shown outside the village confines. The area shown is lower lying and effectively joins up with Long Buckby Wharf and on the other side of the A5 with Daventry with another elongated acceptable area for development outside the existing confines of the town. It seems logical to site these homes adjacent to the station, but the station is already 0.8 miles from the High Street so outside the recommended walking distance of 0.25 miles (400m stated elsewhere in the plan) for a community to local facilities. This area is currently at low risk from surface flooding, but nearby Crick had severe flooding of the whole railway line in 2016 which led to total disruption of all the railway services to London. Hard standing and run off from substantial new developments will increase this risk. Another example is for asking Welford to accommodate 53 more houses within the village confines-again not possible- already expanded by almost the same number of houses a from 2017 supposedly meeting future housing targets. Overspill would conflict with the neighbourhood plan and the recognition of the important archaeological value of the surrounding fields, grazed by sheep.

WNC Policy R1 – Primary Service Villages

WNC Policy R1 – Primary Service Villages	CPRE View	Comments and suggestions
Open Countryside The intrinsic character, beauty and tranquillity of the open countryside of West Northamptonshire will be recognised and protected	Support only after word change	
The Primary Service Villages perform a crucial role in helping to provide an important range of		

<p>services and facilities and access to employment opportunities to meet the day-to-day needs of the local communities they serve. The Primary Service Villages are identified as: Brixworth, Bugbrooke, Crick, Deanshanger, Long Buckby, Middleton Cheney, Roade, Weedon and Woodford Halse</p>		
<p>A. Development at the Primary Service Villages will be located within the confines of the village as defined on the Inset map</p>		
<p>B. Development outside the defined confines will be acceptable only in the following circumstances: i. Where the site immediately adjoins the settlement confines; and ii. the housing land supply is less than five years or where the Housing Delivery Test is not met; or iii. The development is a Rural Exception Site that accords with Policy HO4; or iv. The development is a Local Needs Site that accords with Policy HO5, or v. The development is economic development that will enhance or maintain the vitality or sustainability of the Primary Service Village or would contribute towards and improve the local economy; or vi. It is development which otherwise accords with Policy EC2.</p>	<p>Support only after word change</p>	<p>item ii) relating to the 5-year land supply should be omitted for this policy as future governments may remove this requirement. This judgement, if required, should be made as part of the planning balance. As part of this policy, it is an open door for developers to build anywhere.</p>
<p>the development would not lead to future coalescence with another settlement.</p>		
<p>C. To ensure that the role of these villages is maintained, all development at the Primary Service Villages, within or outside the confines shall also meet the following criteria: i. Be of an appropriate scale relative to its role as a Primary Service Village; and ii. Not result in the loss of existing services and facilities important to the sustainability of the settlement and its role as a Primary Service Village; and iii. Protect the form, character, appearance and setting of the village and areas of historic or environmental importance including those identified in conservation area appraisals, village design statements and the Local Nature Recovery Strategy; and iv. Protect the integrity of garden or other open land that makes an important contribution to the form, character, appearance and setting of the settlement, and v. Not result in the loss of land from employment use within an Employment Area; and vi. Be accessible by walking and cycling to the majority of services and facilities within the settlement; and vii. Protect the amenity of existing residents.</p>		

WNC Policy R2 – Secondary Service Villages

WNC Policy R2 – Secondary Service Villages	CPRE View	Comments and suggestions
The Secondary Service Villages perform an important role in helping to provide some services and facilities for the local communities which they serve. Secondary Service Villages are identified in this plan as: Badby, Barby, Blakesley, Blisworth, Boddington (Upper), Boughton, Brafield on the Green, Braunston, Byfield, Chacombe, Chipping Warden, Charlton, Cogenhoe, Creaton, Croughton, Culworth, Denton, East Haddon, Farthinghoe, Flore, Greatworth, Greens Norton, Guilsborough, Hackleton, Harpole, Hartwell, Kilsby, Kings Sutton, Kislingbury, Little Houghton, Milton Malsor, Naseby, Nether Heyford, Old Stratford, Pattishall (Astcote and Eastcote), Paulerspury, Pitsford, Potterspury, Silverstone, Spratton, Staverton, Stoke Bruene, Syresham, Walgrave, Welford, West Haddon, Yardley Gobion, Yardley Hastings, Yelvertoft		
A. Development at the Secondary Service Villages will be located within the confines of the village as defined on the Inset Map.		
B. Development outside the defined confines will be acceptable only in the following circumstances: i. Where the site immediately adjoins the settlement confines; and ii. the housing land supply is less than five years or where the Housing Delivery Test is not met; or iii. the development is a Rural Exception Site that accords with Policy HO4; or iv. the development is a Local Needs Site that accords with Policy HO5; or v. the development is economic development that will enhance or maintain the vitality or sustainability of the Secondary Service Village or would contribute towards and improve the local economy;	Support only after word change	item ii) relating to the 5-year land supply should be omitted for this policy as future governments may remove this requirement. This judgement, if required, should be made as part of the planning balance. As part of this policy, it is an open door for developers to build anywhere.
the development would not lead to future coalescence with another settlement.	Support only after word change	
C. To ensure that the role of these villages is maintained, all development at the Secondary Service Villages, within or outside the confines shall also meet the following criteria: i. Be of an appropriate scale relative to its role as a Secondary Service Village; and ii. Not result in the loss of existing services and facilities		

important to the sustainability of the settlement and its role as a Secondary Service Village; and iii. Protect the form, character, appearance and setting of the village and areas of historic or environmental importance including those identified in conservation area appraisals village design statements and the Local Nature Recovery Strategy; and iv. Protect the integrity of garden or other open land that makes an important contribution to the form, character and setting of the settlement; and v. Be accessible by walking and cycling to the majority of services and facilities within the settlement; and vi. Protect the amenity of existing residents. 217		
D. Development that is provided for in a made neighbourhood development plan will also be supported.		

WNC Policy R3 – Other Villages.

WNC Policy R3 – Other Villages	CPRE View	Comments and suggestions
The Other Villages perform a predominantly local role in providing a limited number of services and facilities for their residents. Other Villages are identified as: Abthorpe, Arthingworth, Ashby St Ledgers, Ashton, Aston Le Walls, Aynho, Castle Ashby, Chapel Brampton, Charwelton, Church Brampton, Church Stowe, Clipston, Cold Ashby, Cosgrove, Cottesbrooke, Dodford, Evenley, Everdon, Eydon, Farthingstone, Gayton, Grafton Regis, Great Brington, Great Houghton, Great Oxendon, Hannington, Hellidon, Helmdon, Hinton in the Hedges, Holcot, Hollowell, Lilbourne, Litchborough, Little Brington, Lower Harlestone, Maidford, Maidwell, Marston St Lawrence, Marston Trussell, Moreton Pinkney, Newnham, Norton, Old, Onley, Overstone, Quinton, Ravensthorpe, Rothersthorpe, Scaldwell, Shutlanger, Sibbertoft, Sulgrave, Thornby, Thorpe Mandeville, Tiffield, Wappenham, Watford, Weedon Lois, Welton, Whilton, Whitfield, Whittlebury, Wicken. 218		
A. Development at the Other Villages will be located within the confines of the village.		
B. Development outside the confines will be acceptable only in the following circumstances; i. Where the site immediately adjoins the settlement confines; and ii. the development is a Rural Exception Site that accords with Policy HO4; or iii. the development is a Local Needs		

Site that accords with Policy HO5 or iv. the development is economic development that will enhance or maintain the vitality or sustainability of the Other Village or would contribute towards and improve the local economy.		
the development would not lead to future coalescence with another settlement.	Support only after word change	
C. To ensure that the role of these villages is maintained, all development at the Other Villages, within or outside the confines shall also meet the following criteria: i. Be small scale; and ii. Not result in the loss of existing services and facilities important to the sustainability of the settlement and its role as an Other Village; and iii. Protect the form, character, appearance and setting of the village and areas of historic or environmental importance including those identified in conservation area appraisals, village design statements and the Local Nature Recovery Strategy; and iv. Protect the integrity of garden or other open land that makes an important contribution to the form, character, appearance and setting of the settlement; and v. Be accessible by walking and cycling to the majority of services and facilities within the settlement; and vi. Protect the amenity of existing residents.		
D. Development that is provided for in a made neighbourhood development plan will also be supported		

WNC Policy R5 – Open Countryside

WNC Policy R5 – Open Countryside	CPRE View	Comments and suggestions
The intrinsic character, beauty and tranquillity of the open countryside of West Northamptonshire will be recognised.		
To achieve this, only the following forms of development will be supported in the open countryside: i. Development, including the re-use or conversion of existing buildings, essential to ensure the continuing function of a rural business that meets the requirements of Policy HO12 (Rural Worker’s Accommodation); or ii. The replacement of an existing building of the same general size, character, massing and bulk predominantly on the same footprint, for the same use, that respects the character of its rural surroundings; or iii. Agricultural development	Support only after word change	iii. Agricultural development that respects the character of its rural surroundings both in relation to its physical location, scale, colour and design and also the operational impacts that it would have on the area in which it is located and the communities of that area;

<p>that respects the character of its rural surroundings both in relation to its physical location, scale, colour and design and also the operational impacts that it would have on the area in which it is located and the communities of that area; or iv. Individual isolated dwellings of exceptional design quality; or v. Development that results in the optimal viable use of a heritage asset in accordance with Policies BN1 (West Northamptonshire’s Historic Environment), BN2 (Designated Heritage Assets) and BN3 (Non-designated Heritage Assets); or vi. The re-use of redundant or disused buildings of historic merit that lead to an enhancement to the immediate setting; or vii. A proposal for the reuse and adaptation of a building of traditional style or character where: a. The building is capable of conversion without the need to rebuild or significantly alter, and b. The building and its setting are of a character sympathetic to its surroundings, and c. The proposed use can be accommodated within the existing framework of the building, and d. The nature, scale, form and design of the proposal is sympathetic to the existing character of the building and its surrounding environment; Extensions to existing buildings that respect their scale, form and character; or viii. Essential investment in infrastructure including utilities; or ix. Development that accords with Policy EC3 (Rural Economy), or x. Overnight Lorry Parking that otherwise accords with policy TR6; or xi. Development that otherwise accords with the Rural Settlement Hierarchy; or xii. A Rural Exception Site which complies with Policy HO4 or Local Needs Site which complies with Policy HO5. xiii. Development that accords with the requirements of Policy HO11(Gypsies, Travellers, Travelling Showpeople).</p>		
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WNC Policy R6 Rural areas housing requirements

WNC Policy R6 – Rural areas housing requirements	CPRE View	Comments and suggestions
<p>Housing sites will be identified to provide for the parish housing requirements set out below. Suitable sites, within or immediately adjoining the confines of the villages referenced, will be identified either through neighbourhood development plans or through a development plan document.</p>		

<p>Rural areas housing requirements If draft neighbourhood development plans making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress within two years of the adoption of the Plan the Council will allocate sites for development within a development plan document in order to meet the requirements of this Local Plan. Progress thereafter will be reviewed on an annual basis.</p>		
<p>Where rural housing numbers cannot be accommodated within the agreed settlement boundary within the neighbourhood plan, reference should be made to the policy qualifications in R1,2 and 3 for site allocations outside the settlement boundary Similarly, where sites are allocated by the Local Authority the same qualifications should apply.</p>	<p>Support only after word change</p>	
<p>Minimum housing figure by Parish Parish Settlements for Neighbourhood Plan Allocations Housing Figure Badby Badby 29 Barby Barby 58 Blakesley Blakesley 23 Blisworth Blisworth 88 Boddington Upper Boddington 31 Boughton Boughton 42 Brafield on the Green Brafield on the Green 31 Braunston Braunston 85 Brixworth Brixworth 242 Bugbrooke Bugbrooke 126 Byfield Byfield 60 Chacombe Chacombe 28 Chipping Warden and Edgecote Chng Warden 31 Cogenhoe and Whiston Cogenhoe 67 Creaton Creaton 22 Crick Crick 98 Croughton Croughton 43 Culworth Culworth 20 Deanshanger Deanshanger 168 Denton Denton 34 East Haddon East Haddon 32 Farthinghoe Farthinghoe 19 Flore Flore 64 Greatworth and Halse Greatworth 40 Greens Norton Greens Norton 74 Guilsborough Guilsborough 31 Hackleton Hackleton 81</p>		

<p> Harpole Harpole 110 Hartwell Hartwell 83 Kilsby Kilsby 62 Kings Sutton Kings Sutton 105 Kislingbury Kislingbury 63 Little Houghton Little Houghton 21 Middleton Cheney Middleton Cheney 178 Milton Malsor Milton Malsor 34 Naseby Naseby 33 Nether Heyford Nether Heyford 72 Newbottle Charlton 23 Old Stratford Old Stratford 106 Pattishall Pattishall 69 Paulerspury Paulerspury 49 Pitsford Pitsford 30 Potterspury Potterspury 73 Roade Roade 156 Silverstone Silverstone 131 Spratton Spratton 54 Staverton Staverton 24 Stoke Bruerne Stoke Bruerne 18 Syresham Syresham 38 Walgrave Walgrave 42 Weedon Bec Weedon 142 Welford Welford 53 West Haddon West Haddon 81 Woodford cum Membris Woodford Halse 186 Yardley Gobion Yardley Gobion 55 Yardley Hastings Yardley Hastings 37 Yelvertoft Yelvertoft 37 </p>		
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Chapter 11: Homes

Policy HO1 sets the requirement as 47,307. This is a figure generated from the formula in the NPPF and must not be confused with housing need.

The allocation tables identify 35,578 (Northampton)+14,063 (Towns)+3832 (villages) = 53,473. This represents an over allocation of 13% (about 6,000 Houses) calling into question the need for some of the allocated housing areas – for example most of the proposed area at Long Buckby.

Policy HO2 sets out an expectation for affordable housing. This is important and must be maintained. The exception allowed by clause C concerning viability should be struck out as it is too often used as a post planning excuse that a developer will use to maximise profit on a site. To allow a reduction in the percentage the council will have to adjudicate an exceptional reason that could not have been evident when the application or planning was given. Financial viability is not an impact that the council should accept as this should always be a developer risk.

Chapter 12: Economic Growth

EC10 South Junction 16 on M1 – Currently open farmland. The size of the proposed development area will have a major impact on Nether Heyford.

EC11 DIRFT (East) – This large area is badly located. Infill northeast of Junction 18 would be preferable and more logical.

South Junction 15 – The majority of this land is now brownfield following use associated with the M1 improvement works.

T4 Towcester Bell Plantation – Area already subject to planning permission.

T6 Towcester Tiffield - – Area already subject to planning permission

Policy EC1 – Employment land provision and affordable workspaces

WNC Policy EC1 – Employment land provision and affordable workspaces	CPRE View	Comments and suggestions
<p>A. Provisions will be made to accommodate the employment land requirements for West Northamptonshire over the plan period. This will be achieved through allocations made in this Plan, existing commitments, and allocations in Neighbourhood Development Plans. Provision will be made for the following minimum requirements: i. Office and Research and Development: Approximately 15.8 ha, of which a minimum of 10 ha should be dedicated office space, ii. Local industrial and warehousing (units under 9,300 sq m): Approximately 104 Ha, iii. Strategic industrial and warehousing (units over 9,300 sq m): Approximately 484 ha</p>	<p>Support only after word change</p>	<p>CPRE recognises the economic importance of logistics but is deeply concerned about the scale and countryside impacts of this strategy.</p>
<p>B. In addition to meeting these minimum requirements, the Council will support a broad range of employment generating uses, such as advanced manufacturing and advanced logistics, life sciences, motorsports, creative and digital, innovative technologies, and clean energy</p>	<p>Support only after word change</p>	<p>Policy EC1 section B implies that the council will support development outside the allocated areas but gives no requirements of any kind that have to be met. This lack of qualification is at odds to the policy thrust set out in Chapter 10 that highlights Plan Led development. Industrial development, particularly is the >9,000m2 range, is intrinsically damaging to the landscape and character of any location. As such the selection of possible sites must be led by the council - recognising their role, set out at length in this Draft Plan, as custodians of the County. The</p>

		location of industrial development cannot be left to developers who will offer mitigation that is out of character for the country and frequently blocks rather than enhances views.
C. The Council will support new developments which will provide affordable workspaces	Support only after word change	

The draft Plan proposes approximately 484 hectares of land for strategic industrial and logistics development, including new allocations at M1 junctions and the expansion of DIRFT. CPRE recognises the economic importance of logistics but is deeply concerned about the scale and countryside impacts of this strategy.

The Sustainability Appraisal identifies that strategic warehousing sites are likely to result in significant adverse effects in terms of congestion, even if largely confined to the strategic road network. Where significant adverse effects are identified, the Plan must clearly demonstrate how these will be avoided or substantially mitigated.

Policy EC2 – Supporting employment sites and economic development

WNC Policy EC2 – Supporting employment sites and economic development	CPRE View	Comments and suggestions
To help create jobs and to support a vibrant, successful and developing local economy, existing and allocated employment sites and industrial estates across West Northamptonshire will be retained for employment uses (Classes E(g), B2 and B8).	Support only after word change	The appropriateness and viability of policies EC8 and EC9 must be re-examined.
A. Proposals should demonstrate how they have regard to the priorities of the West Northamptonshire Economic Growth Strategy 2025, as appropriate to their scale and nature.	Support	
B. Proposals for E(g), B2 and B8 uses, including the expansion of existing businesses, will be supported where they promote and support the role and performance of the employment area and do not harm the amenity of surrounding residential properties. <u>Where possible</u> , new development should provide for a range of unit sizes to enhance choice for businesses.	Support only after word change	Remove the wording “where possible”
C. Alternative uses or redevelopment which will result in the net loss of employment activity will only be supported if reliable, up-to-date evidence is provided demonstrating that the employment provision is i. No longer required;	Support	

and ii. No longer viable and/or has no realistic prospect of being re-used for employment purposes through refurbishment, adaptation, sub-division or redevelopment; or iii. There is a clear conflict with adjoining uses that cannot be mitigated, and all reasonable means to resolve the conflict have been explored.		
D. Proposals for alternative employment-generating or non-employment uses must demonstrate i. There would be no direct or cumulative negative impact on the vitality, viability or function of the employment area and other centres; ii. Good accessibility by walking, cycling and public transport for the proposed use; iii. That the proposal supports the role and performance of the employment area; iv. That there are no other more suitable locations outside of the employment area that are available, v. Where the Council considers there may be an adverse impact on the provision of E(g), B2 or B8 uses, robust evidence (including at least 12 months' active marketing and that no suitable interest has been expressed) is provided that the site is no longer attractive to the market for these uses.	Support	
E. Proposals for new E(g), B2 or B8 development beyond defined employment areas will only be supported where: i. The development is well-related to an existing employment area; ii. There is insufficient capacity within existing employment area to accommodate the proposal; iii. The scale, character, and location are appropriate and do not result in unacceptable harm to amenity; iv. It is demonstrated to be necessary to support the role and function of the employment area or strategic site.	Support	

Policy EC 2 should include alongside the protection of residential amnesty the protection of views within the countryside

Insufficient reference is made to the protection of vista and wide countryside views from the impact of development for employment purposes

WNC Policy EC8 Cosgrove and Old Stratford, Land at Former Furtho Pit

WNC Policy EC8 Cosgrove and Old Stratford, Land at Former Furtho Pit	CPRE View	Comments and suggestions
Site EC8 is allocated for 16 ha. of mixed	Disagree and	

employment generating development. A variety of employment types will be sought to reflect the need for diversity and resilience in the local economy as expressed in the Council's Economic Growth Strategy.	requires removal	
A. An integrated, coordinated and comprehensive planning approach will be taken for the employment site. Development proposals for this site must be informed by a masterplan, agreed by the Council, that must demonstrate how the site can come forward comprehensively.	Disagree and requires removal	
B. The uses on the site will be a mix of E(g) (Uses which can be carried out in a residential area without detriment to its amenity), B2 (general industrial) and B8 (storage and distribution). Supporting uses may be included where they are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use. The overall mix of uses will be required to be supported by an independent market assessment.	Disagree and requires removal	
C. Access to the site will be from the A508; and i. new footpaths and cycleways to link to existing networks including to a proposed new adjoining country park and utilise the existing pedestrian crossing over the A5 linking to 281 Old Stratford having appropriate regard to the retention and enhancement of the existing public rights of way through the site; ii. Good accessibility to public transport services should be provided for, including contributions to the cost of establishing bus services including stops to the site, to promote sustainable transport; and iii. A transport assessment and travel plan will be required to assess the transportation implications of the proposed development and to identify appropriate mitigation measures. iv. Assessments will be required to consider noise arising from both the A5 and A508. Proposals must also demonstrate that there would be no significant adverse impacts on air quality or light pollution, with appropriate assessments provided.	Disagree and requires removal	
D. A detailed heritage impact assessment will be required for the whole site, to be agreed with the Local Planning Authority in consultation with Historic England: i. To inform the height of any proposed buildings, layout and the extent of the development. This will include a detailed assessment of the effects of the development of the site on the significance of the scheduled	Disagree and requires removal	

monument 'Motte and Bailey Castle' Deserted Village and Monastic Grange at Old Wolverton; as well as detailed consideration of the development's effects on the significance of other designated and non-designated heritage assets, if any. The agreed assessment will inform any mitigation works required to ensure that the development of the site would avoid harm to the significance of heritage assets; and ii. To provide detailed consideration of the safeguarding of the existing canal route through the site and how the layout of the country park has regard to the potential future need for new sections of canal to cross it to facilitate restoration.		
E. Prior to the submission of an application, a detailed assessment for the whole site to characterise archaeological remains will be undertaken to identify the direct impact of development proposals and to inform the design and programme of archaeological mitigation which could involve preservation in situ by design or record or a combination of the two. This is to be agreed with Historic England	Disagree and requires removal	
F. A detailed strategic landscape and visual impact assessment of the whole site will be required to deliver a high-quality landscape setting within and around the boundary of the proposal	Disagree and requires removal	
G. Detailed impact assessments will be required explaining how the proposals will safeguard the local wildlife site within its boundary and contribute towards biodiversity net gains	Disagree and requires removal	
H. Proposals will need to provide protection of the existing Anglian water drainage and water infrastructure that crosses the site	Disagree and requires removal	
I. An assessment demonstrating compliance with the South Northamptonshire Employment Site Allocations Development Brief (October 2022), or any equivalent successor document will be required	Disagree and requires removal	

Policy EC9 – Whittlebury, Land at Shacks Barn

WNC Policy EC9 Whittlebury, Land at Shacks Barn	CPRE View	Comments and suggestions
Whittlebury, Land at Shacks Barn Site EC9 is allocated for 10ha of mixed employment generating development	Disagree and requires removal	Further development at this site is unjustified and would face significant infrastructure issues.
A. An integrated, coordinated and	Disagree and	

<p>comprehensive planning approach will be taken for the employment site. Development proposals for this site must be informed by a masterplan, agreed by the Council, that must demonstrate how the site can come forward comprehensively.</p>	<p>requires removal</p>	
<p>B. The uses on the site will be a mix of E(g) (Uses which can be carried out in a residential area without detriment to its amenity), B2 (general industrial) and B8 (storage and distribution). Supporting uses may be included where they are demonstrated to be subservient and complementary in both scale and nature to the proposed E(g) or B class use. The overall mix of uses will be required to be supported by an independent market assessment.</p>	<p>Disagree and requires removal</p>	
<p>C. Access to the site will be based on the existing access only; and i. Provision of new footpaths and cycleways that link to existing networks; and ii. Good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of pedestrian cycling and walking links between the site and Towcester town; and iii. A transport assessment and travel plan will be required to assess the transportation implications and to identify appropriate mitigation measures.</p>	<p>Disagree and requires removal</p>	
<p>D. A detailed heritage impact assessment will be required for the whole site, to be agreed with the Local Planning Authority in consultation with Historic England where relevant to the scheduled monument, to the assessment will: i. Inform the height of any proposed buildings, layout and extent of the proposed development, taking into account the site allocation and inline with the relevant supplementary planning document, ii. Include a detailed assessment of the effects of the development of the site on the significance of the scheduled monument, Lordsfield Farm iii. Consider the impacts on the designated and non-designated heritage assets (where applicable), and iv. Subject to the assessment being agreed, identify proportionate mitigation measures that ensure that the development avoids harm to significant heritage sites, The assessment and findings, including mitigation measures, must be included with any planning application.</p>	<p>Disagree and requires removal</p>	
<p>E. Prior to the submission of an application, a</p>	<p>Disagree and</p>	

<p>detailed archaeological assessment for the whole site will be undertaken to characterise archaeological remains, identify potential impacts and to inform an appropriate programme of archaeological mitigation which could involve preservation in situ by design or record or a combination of the two. The scope and methodology of this work will be agreed with the Local Planning Authority.</p>	<p>requires removal</p>	
<p>F. A detailed strategic landscape and visual impact assessment of the whole site will be required to deliver a high-quality landscaped setting within and around the boundary of the proposal.</p>	<p>Disagree and requires removal</p>	
<p>G. An assessment demonstrating compliance with the South Northamptonshire Employment Site Allocations Development Brief (October 2022), or any equivalent successor document will be required</p>	<p>Disagree and requires removal</p>	

Chapter 13: Built and Natural Environment

The Historic Environment

BN3 - section D heading should be Structures, Landscapes and historic Parks and Gardens

Alternatively, a separate section covering historic parks and gardens (registered parks and gardens) should be included in the Historic Environment section.

Policy BN3 – Section D includes landscapes as an asset – very much in line with the paper produced by Carew. We should seek to get locally valued Landscapes included in this section.

13.6.1 In this clause the council undertake to ensure that all development will be landscape led. This is very good.

13.6.2 This should include reference to the CPRE Landscape Design Guide (2023).

13.6.3 This clause includes the term 'local valued landscapes'

CPRE supports the Plan's ambition to enhance green infrastructure networks and deliver long-term environmental benefits. However, policies rely heavily on future design stages without sufficient clarity on delivery, governance and long-term management.

CPRE recommends that the Plan requires funded management arrangements for green infrastructure for a minimum of 30 years, with clear responsibilities for delivery and maintenance.

CPRE strongly supports the retention and strengthening of policies relating to Special Landscape Areas and Green Wedges. The Plan itself acknowledges development pressures around key motorway junctions and the importance of Green Wedges in preventing settlement coalescence.

However, these acknowledgements are not consistently reflected in site allocation decisions. CPRE considers that landscape sensitivity and settlement separation should be treated as defining constraints, not as issues to be mitigated after allocation

This section seems small for a predominantly rural county.

Also consider adding CPRE Northamptonshire Design Guide published 2024 as one of the references.

Policy BN3 – Non-Designated heritage assets

WNC Policy BN3 – non-designated heritage assets	CPRE View	Comments and suggestions
A. Proposals for development, including change of use, that affect a non-designated heritage asset, or the setting of a non-designated heritage asset will be expected to have regard to the significance of the asset and its setting.	Support	

Buildings		
B. Proposals affecting a building should retain and re-use the building in a way that is sympathetic to its significance. In considering proposals that would result in harm to, or loss of, significance regard will be had to the scale of any harm or loss and the significance of the asset	Support	
C. Proposals that would result in total loss of a building will be required to satisfy the following requirements: i. Through appropriate evidence the asset is not capable of viable repair; or ii. Despite appropriate marketing the asset has no viable use; and iii. The replacement scheme would result in a proposal of equal or greater quality. Structures and landscapes	Support	
D. Proposals affecting structures and landscapes should retain the asset in a way that is sympathetic to its significance. In considering proposals that would result in harm to, or loss of, significance regard will be had to the scale of any harm or loss and the significance of the asset.	Support only after word change	BN3 - section D heading should be Structures, Landscapes and historic Parks and Gardens

Policy BN9 – Nature Conservation

WNC Policy BN9 Nature Conservation	CPRE View	Comments and suggestions
A. Development will be required to: i. Protect and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity/ geodiversity will be expected to provide an ecological assessment which demonstrates an understanding of the importance of biodiversity/ geodiversity assets (as defined in C.) on site and in the surrounding area, and the potential impact of the proposed development on these assets. The assessment must set out the measures to be taken to minimise harm to nature conservation assets by following the mitigation hierarchy of: a. Avoiding harm to biodiversity/ geodiversity, particularly where it is irreplaceable, and including consideration of alternative sites where appropriate, then b. Mitigating (within the local area) any harm to biodiversity, then c. Compensating for any remaining harm to biodiversity (within the local area or in other identified areas). ii. Achieve a net gain in biodiversity in line with policy BN10; and iii. Make appropriate provision for long-term management of habitats and geological features connected to or affected by the development.	Support only after word change	Ai) c) or other identified area - should be omitted to ensure that mitigation relates as close as possible to the area where harm has been caused.

<p>B. Proposals should have regard to principles set out in the Northamptonshire Biodiversity SPD or successor document and where necessary undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards to inform development.</p>	<p>Support</p>	
<p>C. Development proposals will be required to protect or enhance biodiversity assets in proportion to their importance: i. Sites of national or international importance – Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and / or national importance and development affecting them will be expected to avoid causing adverse effects. ii. Sites of local importance – Development affecting West Northamptonshire Local Nature Reserves, Local Wildlife Sites, Local Geological Sites and Potential Wildlife Sites will be expected to avoid causing adverse effects on these assets unless it can be demonstrated that the benefits of development clearly outweigh the harm. iii. Other biodiversity assets – Development affecting sites that are not formally designated, but which make a positive contribution to biodiversity (such as biodiversity gain sites, areas identified in the LNRS for nature recovery and the River Nene Nature Improvement Area) will be required to take into account their current or potential role in West Northamptonshire wider biodiversity network. iv. Priority Species and Habitats - Development proposals should avoid negative impacts upon Priority Habitats and Species, instead promoting their conservation, restoration and enhancement of habitats, and the protection and recovery of species. v. Irreplaceable habitats - Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland, ancient trees and veteran trees and buffer zones) will be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists] vi. Show the connectivity between rivers and other watercourses and other habitats where this would achieve an improvement in wildlife corridors and habitat management.</p>	<p>Support</p>	
<p>conservation D. If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission will be refused.</p>	<p>Support</p>	

Chapter 14: Transport

No comments in this section

Chapter 15: Infrastructure

CPRE Northamptonshire supports the principle that infrastructure must be delivered alongside homes and jobs in a timely manner. However, the chapter as drafted is too general and leaves too much to later stages of plan-making and decision-taking.

Paragraphs 15.1.1 to 15.1.4 state that infrastructure will need to be delivered alongside growth, that a Phase 1 review of the Infrastructure Delivery Plan has been undertaken, and that a Phase 2 review will be undertaken after consultation to identify any additional transport and other infrastructure needed to support the combined growth in the WNJCS, WNLP and Part 2 plans. CPRE is concerned that this indicates that important elements of the infrastructure evidence base remain incomplete at Regulation 18 stage.

This is a significant issue of plan soundness. The National Planning Policy Framework requires plans to promote a sustainable pattern of development that aligns growth and infrastructure, to be shaped by effective engagement with infrastructure providers, and to make sufficient provision for infrastructure. It also requires plans to set out the contributions expected from development, including transport, education, health, flood and water management, and green infrastructure, and provides that a plan is sound only if it is positively prepared, justified, effective and consistent with national policy.

1. Infrastructure evidence should be complete before the Plan advances

CPRE considers that the Plan should not rely on a later “Phase 2” IDP review to identify the additional infrastructure consequences of the growth now being proposed. The Plan should instead demonstrate, at this stage, what infrastructure is required, where it is required, who will provide it, how it will be funded, and when it will be delivered. Without that, it is difficult to conclude that the current strategy is justified or deliverable.

Suggested addition:

“The Council will ensure that the Infrastructure Delivery Plan identifies, for each strategic allocation, the infrastructure required, the delivery body, the likely funding source, the indicative trigger point for delivery, and any dependencies on third parties or cross-boundary schemes.”

2. Infrastructure should be phased to precede or accompany development

The current wording is not strong enough on timing. It is not sufficient merely to say infrastructure will be delivered “alongside” growth. For major housing and logistics sites, the

policy should make clear that essential infrastructure must be in place before, or in step with, development.

This is especially important for transport, water, drainage, schools, healthcare and green infrastructure. National policy requires plans to align growth and infrastructure, and to set out the contributions expected from development.

Suggested addition:

“Development will be phased so that essential infrastructure is delivered in advance of, or concurrently with, the occupation and operation of development, and not deferred to an uncertain future date.”

3. The chapter should refer expressly to cumulative transport impacts

This is a major omission. Elsewhere in the evidence base, the Sustainability Appraisal states that the strategic warehousing allocations at land east of the M1 (EC11), land south of Junction 16 M1 (EC10), and land south of Junction 15 M1 (EC13/N25) are likely to have significant adverse effects in terms of congestion, albeit largely on the strategic road network. The infrastructure chapter should therefore acknowledge cumulative network effects explicitly, rather than speaking only in broad terms.

This is also directly relevant to the NPPF. Paragraph 115 requires plan-makers, when assessing sites that may be allocated for development, to ensure that sustainable transport modes are prioritised, safe and suitable access can be achieved, and any significant impacts on the transport network can be mitigated to an acceptable degree. Paragraph 116 says development should only be prevented or refused on highways grounds if the residual cumulative impacts on the road network would be severe.

Suggested addition:

“The Infrastructure Delivery Plan and transport evidence should assess the cumulative effects of all strategic housing, industrial and logistics allocations on both the strategic and local road network, including freight movements, junction performance, rat-running risk and impacts on rural communities.”

4. Sustainable transport infrastructure needs greater prominence

The infrastructure chapter should not read primarily as a framework for accommodating more traffic. National policy requires plans to prioritise sustainable transport modes when allocating sites. CPRE considers the chapter should give more weight to:

- bus service provision, especially rural connectivity.
- rail-related improvements where growth is justified by rail accessibility.
- active travel links that are practical and direct rather than aspirational only.
- integration between strategic growth areas and existing settlements.

This is particularly important where allocations are being justified by supposed transport sustainability, such as Long Buckby Station.

Suggested addition:

“The Council will prioritise investment in public transport, rail connectivity, walking, wheeling and cycling infrastructure as essential infrastructure, and not treat sustainable transport as secondary to highway capacity enhancement.”

5. Green infrastructure should be treated as essential infrastructure, not optional mitigation

The chapter should say more clearly that green infrastructure is infrastructure in its own right. NPPF paragraph 35 expressly includes green infrastructure within the infrastructure for which plans should set out contributions, and paragraph 188 requires plans to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.

Given the scale of growth proposed, CPRE considers that the chapter should cross-refer more directly to BN13 and BN14 and require strategic green infrastructure delivery, not just site-by-site landscaping.

Suggested addition:

“Green infrastructure, including habitat networks, publicly accessible natural greenspace, flood storage areas, tree planting, and strategic landscape buffers, will be treated as essential infrastructure and secured with long-term management and funding arrangements.”

6. Water, drainage and wastewater infrastructure should be stronger

The chapter should place greater emphasis on water supply, wastewater treatment, flood resilience and the capacity of foul drainage infrastructure. This is particularly important where strategic growth is proposed in areas already facing environmental constraints.

National policy requires strategic policies to be informed by strategic flood risk assessment and to manage flood risk from all sources, taking account of cumulative impacts. It also requires development to be directed away from areas at highest risk and made safe for its lifetime without increasing flood risk elsewhere.

Suggested addition:

“The Infrastructure Delivery Plan should identify the water supply, wastewater treatment and drainage upgrades required to support development, including delivery triggers and confirmation from the relevant infrastructure providers that capacity can be secured within the plan period.”

7. The chapter should be clearer on delivery bodies, funding and certainty

At present the chapter speaks in broad partnership terms. That is not enough. If the Plan is to be effective, it needs to identify which infrastructure is expected to be delivered by:

- developers through section 106 or CIL.
- the Council.
- statutory undertakers.
- National Highways, NHS bodies, education providers, water companies or others.

National policy requires this level of clarity because plans should set out the contributions expected from development and should not undermine deliverability.

Suggested addition:

“For all strategic allocations, the Plan and IDP should distinguish clearly between infrastructure expected to be funded by development contributions and infrastructure dependent on external public investment and should identify where delivery remains uncertain.”

8. Overnight lorry parking should be considered as part of infrastructure planning

NPPF paragraph 114 says planning policies should recognise the importance of adequate overnight lorry parking facilities and that proposals for new or expanded distribution centres should make provision for sufficient lorry parking for their anticipated use. Given the logistics-led strategy in West Northamptonshire, this should be treated as part of the infrastructure consequences of strategic employment growth, not left as a disconnected later issue.

Policy TR6 – Lorry parks should be planned comprehensively as part of the logistics strategy, with full consideration of cumulative impacts on rural communities, landscape and tranquillity.

s are areas of hard landscaping. The policy should also require any proposal to meet the flood and environmental (including BNG) targets set for other developments.

CPRE Northamptonshire considers that Chapter 15 should be strengthened so that it demonstrates, rather than merely assumes, that the infrastructure required to support the Plan’s scale of housing and employment growth is identified, funded, phased and deliverable. Without that clarity, the Plan risks failing the tests of justification and effectiveness in the National Planning Policy Framework.

Chapter 16: Implementation and Monitoring

CPRE Northamptonshire welcomes the inclusion of a chapter addressing the implementation and monitoring of the Local Plan. Effective monitoring is essential to ensure that the Plan delivers the intended outcomes and that policies remain responsive to changing circumstances.

However, the current chapter provides only a limited framework for monitoring the delivery of the Plan and would benefit from further development to ensure that it provides a robust mechanism for assessing progress.

The National Planning Policy Framework requires local planning authorities to ensure that plans are deliverable and to monitor the effectiveness of policies so that appropriate action can be taken where necessary. Plans should therefore include clear indicators and mechanisms for reviewing progress.

1. Monitoring indicators should be clearer and more comprehensive

The monitoring framework should include measurable indicators that allow the Council and the public to assess whether the Plan is delivering its intended objectives.

These indicators should cover a range of topics including:

- housing delivery
- employment land delivery
- infrastructure provision
- environmental outcomes
- transport impacts.

At present the monitoring approach appears largely focused on housing delivery. A broader set of indicators would provide a clearer understanding of how development is affecting the area.

Suggested addition

“The monitoring framework should include a clear set of indicators covering housing delivery, employment development, infrastructure provision, environmental protection, transport impacts and green infrastructure delivery.”

2. Monitoring should address cumulative impacts

Given the scale of development proposed across West Northamptonshire, monitoring should consider the cumulative impacts of development rather than assessing each policy area in isolation.

This is particularly important for:

- traffic and congestion
- freight movements associated with logistics development
- loss of agricultural land

- landscape change
- biodiversity outcomes.

Monitoring these cumulative effects will help ensure that development remains consistent with the overall objectives of sustainable development.

Suggested addition

“The monitoring framework should assess cumulative impacts across the plan area, including transport impacts, environmental change and the loss of agricultural land.”

3. Infrastructure delivery should be monitored alongside development

The Plan proposes a significant amount of development over the plan period. It is therefore essential that infrastructure delivery keeps pace with development.

Monitoring should therefore track:

- the delivery of transport infrastructure
- education and health provision
- water and drainage capacity
- green infrastructure.

This will help ensure that infrastructure provision remains aligned with development.

Suggested addition

“The monitoring framework should include indicators relating to infrastructure delivery to ensure that essential infrastructure is provided in step with development.”

4. Monitoring environmental outcomes

The Local Plan contains a number of policies intended to protect and enhance the environment.

Monitoring should therefore track whether these policies are achieving their objectives. This could include indicators relating to:

- landscape protection
- biodiversity and habitat creation
- access to green space
- air quality.

Including environmental indicators will help ensure that development does not undermine the environmental qualities of the area.

5. Clear triggers for review

Monitoring is only useful if it leads to action when problems arise.

The Plan should therefore identify **clear triggers** that would prompt a review of policies or further investigation. For example:

- significant under-delivery of housing
- failure to deliver infrastructure
- unacceptable transport impacts
- significant loss of agricultural land.

Establishing clear review mechanisms will help ensure that the Plan remains effective over time.

Suggested addition

“The monitoring framework should include clear thresholds that would trigger further investigation or review of policies where outcomes differ significantly from those anticipated.”

6. Freight and Logistics Monitoring

The draft Local Plan proposes a significant amount of strategic employment development associated with warehousing and logistics uses. Such development has the potential to generate substantial freight movements across the strategic and local road networks.

Given the scale of logistics development proposed within West Northamptonshire, CPRE Northamptonshire considers that the monitoring framework should include specific indicators relating to freight movements and associated transport impacts.

The National Planning Policy Framework emphasises the importance of ensuring that development proposals give appropriate priority to sustainable transport modes and that the cumulative impacts of development on the transport network are acceptable. It also recognises the need to provide appropriate freight infrastructure, including overnight lorry parking facilities. A monitoring framework that does not track freight-related impacts risks overlooking one of the most significant consequences of large-scale logistics development.

The current monitoring framework appears to focus primarily on housing delivery and general development trends. While these indicators are important, they do not adequately capture the potential cumulative effects of freight-intensive development associated with logistics and distribution uses.

CPRE Northamptonshire therefore recommends that the monitoring framework be expanded to include specific freight-related indicators. These indicators should allow the Council to assess whether logistics development is creating unintended impacts on the transport network, rural communities and environmental quality.

Examples of appropriate monitoring indicators could include:

- changes in heavy goods vehicle (HGV) traffic volumes on key corridors and motorway junctions
- levels of freight traffic using local rural roads
- demand for overnight lorry parking facilities

- freight movements associated with major logistics sites
- air quality and noise impacts associated with freight traffic.

Monitoring these indicators would allow the Council to identify emerging issues at an early stage and take appropriate action where necessary.

Where monitoring indicates that freight-related impacts are greater than anticipated, the Council should consider appropriate mitigation measures. These could include improvements to freight routing, additional infrastructure provision, or review of relevant policies within the Local Plan.

Including freight-related indicators within the monitoring framework would help ensure that the Local Plan remains responsive to the cumulative impacts of logistics development and would strengthen the Council's ability to manage freight growth in a sustainable manner.

Addendum A

Strategic Countryside Protection Assessment

West Northamptonshire Local Plan – Regulation 18 Draft

1. Purpose of this Assessment

This addendum considers how the draft West Northamptonshire Local Plan may affect the countryside, landscape character and rural environment of the area.

CPRE Northamptonshire's purpose is to promote **a beautiful and thriving countryside**, and therefore particular attention has been given to:

- strategic employment allocations
- large housing allocations affecting rural areas
- infrastructure proposals
- cumulative landscape and environmental impacts.

The assessment also considers whether the Local Plan appropriately reflects the objectives of the **National Planning Policy Framework**, particularly those relating to protection of the natural environment and valued landscapes.

2. Strategic Development Pressures on the Countryside

West Northamptonshire is characterised by a predominantly rural landscape consisting of:

- productive agricultural land
- historic villages and rural settlements
- important landscape character areas
- extensive networks of footpaths, bridleways and green infrastructure.

The draft Local Plan proposes a combination of:

- strategic housing growth
- large employment allocations
- significant transport and logistics infrastructure.

While development is necessary to meet housing and economic needs, it is important that the scale and distribution of growth does not undermine the fundamental qualities of the countryside.

3. Strategic Logistics Development

One of the most significant potential countryside impacts arises from the scale of proposed **logistics and warehousing development**.

Strategic employment allocations located close to motorway junctions have the potential to generate:

- large building footprints
- substantial HGV movements
- significant visual and landscape impacts.

Logistics buildings are typically very large structures, often exceeding:

- 20 metres in height
- several hundred metres in length.

Even where such development is located near existing transport infrastructure, the visual and environmental effects can extend over large areas of countryside.

Key countryside impacts may include

- loss of agricultural land
- erosion of landscape character
- increased noise and light pollution
- additional heavy goods vehicle movements through rural areas
- cumulative landscape change where multiple sites are developed.

Where several large logistics sites are located within the same strategic corridor, the cumulative impact may transform the character of the surrounding countryside.

4. Landscape Character and Valued Landscapes

The countryside of West Northamptonshire includes landscapes of significant local value, including areas recognised through local landscape designations and character assessments.

National planning policy emphasises the importance of protecting valued landscapes and ensuring that development responds appropriately to local landscape character.

The Local Plan contains policies recognising:

- Special Landscape Areas
- Green Wedges
- green infrastructure corridors.

CPRE Northamptonshire strongly supports the inclusion of these policies.

However, it is important that these designations function as **effective strategic constraints** rather than simply design considerations applied after development sites have been selected.

Where strategic allocations conflict with landscape sensitivity, this should be clearly justified and accompanied by robust mitigation measures.

5. Agricultural Land and Food Production

The countryside of West Northamptonshire includes large areas of productive farmland which contribute to:

- local food production
- the rural economy
- landscape character and environmental management.

National planning policy recognises the importance of protecting **best and most versatile agricultural land** where possible.

Loss of agricultural land to development is often permanent, particularly where large logistics or infrastructure developments are concerned.

CPRE Northamptonshire considers that greater attention should be given within the Local Plan to:

- the long-term role of agriculture in the county
- the economic importance of farming
- the contribution of farmland to landscape character and biodiversity.

A clearer strategic approach to farmland protection would strengthen the Local Plan and support wider environmental objectives.

6. Cumulative Countryside Impacts

While individual development sites may appear acceptable in isolation, the combined impact of multiple developments can significantly alter the character of rural areas.

Potential cumulative effects include:

- progressive loss of open countryside
- increasing visual prominence of large-scale buildings
- fragmentation of agricultural land
- increased traffic on rural road networks
- gradual erosion of settlement separation.

It is therefore important that the Local Plan considers the cumulative impact of development proposals across the whole plan area.

7. Settlement Separation and Village Character

Many rural settlements in West Northamptonshire retain distinct identities shaped by:

- historic settlement patterns

- surrounding farmland
- local landscape features.

Strategic development can create pressures that reduce the separation between settlements or alter their rural setting.

The Local Plan should ensure that development does not lead to:

- gradual coalescence of settlements
- suburbanisation of rural villages
- loss of important landscape gaps.

Maintaining clear settlement separation helps preserve both landscape character and community identity.

8. Green Infrastructure and Public Access

The countryside of West Northamptonshire provides important opportunities for:

- recreation
- access to nature
- public health and wellbeing.

Green infrastructure networks, public rights of way and open landscapes all contribute to these benefits.

The Local Plan includes positive policies relating to green infrastructure corridors and environmental enhancement.

To ensure these benefits are realised, it is important that:

- green infrastructure networks are protected and enhanced
 - development proposals include effective long-term management arrangements
 - public access to the countryside is maintained and improved where possible.
-

9. Conclusions

CPRE Northamptonshire recognises that the Local Plan must accommodate future housing and economic development.

However, the countryside is a finite resource and once lost it cannot easily be replaced.

The Local Plan should therefore ensure that:

- **development is directed to the most appropriate and sustainable locations**
- **countryside protection policies carry significant weight in decision-making**
- **landscape character and agricultural land are properly safeguarded**
- **cumulative impacts of development are carefully assessed.**

By strengthening the protection of the countryside within the Local Plan, West Northamptonshire Council can ensure that growth is delivered in a way that supports both economic development and the long-term environmental quality of the county.

Addendum B

Strategic Logistics and Employment Impact Assessment

West Northamptonshire Local Plan – Regulation 18 Draft

1. Purpose of this Assessment

This addendum assesses the potential countryside, infrastructure and environmental impacts associated with the strategic logistics and employment allocations proposed in the West Northamptonshire Local Plan Regulation 18 draft.

West Northamptonshire occupies a strategic location within the Midlands logistics corridor, with direct connections to:

- the M1 motorway
- the A5 and A43 strategic road network
- the West Coast Main Line rail corridor.

This location has made the area highly attractive for logistics and distribution development over recent decades.

While such development plays an important role in the regional and national economy, the scale and concentration of logistics growth proposed in the draft Local Plan requires careful assessment to ensure that it remains compatible with sustainable development objectives.

2. Scale of Strategic Employment Allocations

The draft Local Plan proposes a substantial amount of land for strategic employment development, including several large logistics allocations.

The proposed allocations include sites located close to major motorway junctions and existing strategic employment areas.

The scale of these allocations is significant when considered in combination with:

- existing logistics development in the area
- committed permissions
- development already delivered along the M1 corridor.

Large logistics buildings typically involve:

- building footprints of tens of thousands of square metres
- building heights frequently exceeding 20 metres
- extensive service yards and vehicle circulation areas.

The physical scale of such development means that even relatively small numbers of logistics sites can have very substantial landscape and environmental impacts.

3. Strategic Location of Logistics Development

The Local Plan strategy focuses many employment allocations near motorway junctions and key transport corridors.

While this approach has economic advantages, it also has important consequences.

Motorway junctions often sit within open countryside landscapes which provide:

- visual separation between settlements
- important landscape character areas
- agricultural land.

Large logistics sites located in these areas can therefore have a disproportionately large visual and environmental impact.

Where several sites are clustered within the same corridor, the cumulative effect may be to create extensive industrial landscapes extending along major transport routes.

4. Transport and HGV Movements

Logistics development is typically associated with very high levels of freight movement.

This includes:

- long-distance HGV movements on the strategic road network
- regional distribution traffic
- staff commuting.

The cumulative transport impacts of several large logistics developments can therefore be substantial.

Key potential effects include:

- increased traffic congestion at motorway junctions
- pressure on the strategic road network
- increased traffic on local rural roads
- noise and air quality impacts affecting nearby communities.

It is therefore essential that the Local Plan clearly demonstrates that the proposed logistics allocations can be supported by the transport network.

5. Landscape and Visual Impacts

One of the most significant impacts of logistics development is its effect on the landscape.

Warehousing and distribution buildings are often among the largest structures constructed within rural areas.

Their visual effects can include:

- long-distance visibility across open countryside
- skyline impacts in elevated landscapes
- light pollution from large service yards and security lighting
- urbanisation of previously rural landscapes.

Where multiple logistics developments are located within the same landscape character area, the cumulative impact can fundamentally alter the character of the landscape.

6. Agricultural Land Loss

Strategic logistics sites frequently occupy large areas of previously agricultural land.

Such development can result in the permanent loss of productive farmland.

Agricultural land provides:

- food production
- environmental management
- landscape character
- biodiversity habitats.

Once land is developed for logistics use, it is unlikely to return to agricultural use in the future.

The long-term implications of farmland loss should therefore be considered carefully when determining the scale and distribution of employment allocations.

7. Cumulative Landscape Transformation

One of the key strategic issues associated with logistics growth is the potential for cumulative landscape transformation.

Individual sites may appear acceptable when assessed in isolation.

However, when multiple sites are delivered across a wider area the combined impact may include:

- continuous built development along transport corridors
- progressive loss of open countryside
- increasing visual dominance of large buildings
- loss of rural landscape character.

This issue has been observed in several other logistics growth areas across England.

The Local Plan should therefore carefully assess the cumulative impact of employment allocations at a strategic scale.

8. Relationship with National Planning Policy

The National Planning Policy Framework emphasises the importance of supporting economic growth while also protecting the natural environment and promoting sustainable development.

Strategic employment development should therefore be balanced against other planning objectives including:

- protection of valued landscapes
- safeguarding of agricultural land
- minimising environmental impacts
- promoting sustainable transport.

Ensuring that employment allocations are located in the most appropriate locations is therefore a critical aspect of the Local Plan strategy.

9. Recommendations

CPRE Northamptonshire recommends that the Council:

- reviews the cumulative impact of strategic logistics allocations across the plan area
 - ensures that transport modelling fully reflects the potential freight movements associated with logistics development
 - carefully considers landscape sensitivity when determining the location of strategic employment sites
 - ensures that countryside protection policies carry sufficient weight in determining development proposals.
-

10. Conclusion

Logistics development will continue to play an important role in the economy of West Northamptonshire.

However, the scale and distribution of logistics growth must be carefully managed to ensure that it does not undermine the character and environmental quality of the countryside.

By carefully balancing economic development with environmental protection, the Local Plan can provide a framework for sustainable growth that supports both the regional economy and the long-term quality of the landscape.

Addendum C

Local Plan Soundness Assessment

West Northamptonshire Local Plan – Regulation 18 Draft

1. Purpose of this Addendum

This addendum assesses the draft West Northamptonshire Local Plan against the tests of soundness set out in the National Planning Policy Framework (December 2024).

For a Local Plan to be found sound at examination it must be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

This addendum highlights areas where the current Regulation 18 draft may require further clarification, evidence or policy refinement to ensure compliance with these requirements.

2. Test 1 – Positively Prepared

NPPF Requirement

Plans should provide a strategy which seeks to meet objectively assessed development and infrastructure requirements.

Assessment

The draft Local Plan sets out a clear spatial strategy for housing and employment growth across West Northamptonshire, supported by a settlement hierarchy and a series of strategic allocations.

CPRE Northamptonshire recognises the effort made to produce a coherent strategy for accommodating future development and welcomes the focus on directing growth towards existing urban areas and sustainable locations.

However, several elements of the strategy raise concerns regarding whether the plan is fully positively prepared:

Key issues

- the scale of strategic logistics allocations may exceed the level required to meet identified local economic needs
- transport modelling and infrastructure mitigation work appears to still be ongoing while significant allocations are already proposed
- the relationship between housing growth, employment development and supporting infrastructure requires clearer demonstration

Without clear evidence demonstrating that infrastructure can support the scale of development proposed, the spatial strategy may risk creating development patterns that are difficult to deliver sustainably.

Recommended improvement

The Council should ensure that the Local Plan clearly demonstrates:

- how infrastructure requirements will be delivered
 - that employment allocations reflect realistic demand forecasts
 - that development is aligned with sustainable transport objectives.
-

3. Test 2 – Justified

NPPF Requirement

A Local Plan must be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

Assessment

The Local Plan is supported by a number of evidence documents including:

- Sustainability Appraisal
- Habitat Regulations Assessment
- employment and logistics demand studies
- transport evidence.

CPRE Northamptonshire welcomes the breadth of the evidence base.

However, there remain questions regarding whether the chosen strategy is fully justified when reasonable alternatives are considered.

Key issues

- The scale and concentration of logistics development at motorway junctions may have significant landscape and environmental consequences.
- The Sustainability Appraisal identifies adverse effects in relation to congestion and environmental impacts for certain employment allocations.
- It is not always clear how alternative development distributions were considered and rejected.

In particular, the balance between economic development and environmental protection requires clearer explanation.

Recommended improvement

The Council should provide clearer justification showing:

- why the chosen locations for strategic employment sites represent the most sustainable option
 - how alternative strategies were assessed
 - how identified environmental impacts will be mitigated.
-

4. Test 3 – Effective

NPPF Requirement

Plans must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

Assessment

The Local Plan identifies a number of large-scale development sites including:

- strategic housing allocations
- major logistics and employment sites
- significant infrastructure requirements.

Deliverability is therefore a critical issue.

CPRE Northamptonshire is concerned that the plan does not yet fully demonstrate how certain infrastructure requirements will be delivered.

Key issues

- the cumulative impact of logistics development on the strategic road network
- the provision of sustainable transport alternatives to support growth
- the long-term management and funding of green infrastructure networks.

In addition, the success of the spatial strategy may depend on infrastructure outside the direct control of the local planning authority.

Recommended improvement

The Council should provide clearer evidence demonstrating:

- that transport infrastructure can accommodate the scale of development proposed
 - that mitigation measures are deliverable within the plan period
 - that cross-boundary transport and infrastructure issues have been addressed.
-

5. Test 4 – Consistent with National Policy

NPPF Requirement

Plans must enable the delivery of sustainable development in accordance with national policy.

Assessment

Many elements of the Local Plan align well with national policy objectives, including:

- provision of new housing
- support for economic growth
- recognition of the importance of environmental protection.

However, several areas require careful consideration to ensure full consistency with national policy.

Key issues

- ensuring that development patterns reduce reliance on car travel and support sustainable transport
- protecting valued landscapes and the wider countryside
- safeguarding productive agricultural land where possible
- delivering biodiversity and environmental improvements.

The Local Plan includes policies addressing these issues, but the effectiveness of these policies will depend on how they are applied to strategic allocations.

Recommended improvement

The Council should ensure that:

- environmental protection policies carry sufficient weight in decision-making
- landscape and countryside protection are fully integrated into site allocations
- development patterns align with sustainable transport objectives.

6. Overall Conclusion

CPRE Northamptonshire recognises the considerable work undertaken by West Northamptonshire Council in preparing the draft Local Plan and supports the objective of establishing a clear and effective development strategy for the area.

However, the Regulation 18 draft would benefit from further refinement to ensure that it can fully meet the tests of soundness at examination.

In particular, further work is recommended to:

- demonstrate the deliverability of infrastructure required to support development
- strengthen the justification for the scale and location of strategic employment sites
- ensure that countryside protection and environmental objectives are fully integrated into the spatial strategy.

Addressing these issues will help ensure that the Local Plan is capable of meeting national planning policy requirements and providing a robust framework for sustainable development across West Northamptonshire.

WNC Data protection statement.

Data Protection Policy: Any personal information you provide will be held and processed in accordance with the obligations and principles of the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 and in accordance with West Northamptonshire Council's Privacy Policy and Data Protection Notification with the Information Commissioner's Office (No. ZA896620). Please note that it is not possible for representations to be considered anonymously. Representations will be published on the consultation website, but address and contact details removed. The information you provide will only be used for this consultation, and with your permission, to advise you of other consultations. A copy of the privacy notice for the West Northamptonshire Local Plan is available at www.westnorthants.gov.uk/service-privacy-notices

END OF REPORT