



The countryside charity
Northamptonshire

please reply to [REDACTED]

To The Head of Planning Policy , East Northamptonshire Council , Cedar Drive , Thrapston .

Pre-submission on Draft East Northamptonshire Local Plan Part 2/ 2011-2031 Regulation 19 Consultation (February 2021):

Comments from CPRE Northamptonshire (Campaign to Protect Rural England)

Housing Policies EN/25/26/27.

Taking the criteria for soundness as our starting point, the housing targets for the market towns and rural areas may be consistent with national policy, but they do not in all cases resonate with local aspirations and needs. For example, if the assertion that “This Plan should recognise and complement extant policies from made, and future Neighbourhood Plans (p.38, paragraph 2.54) is to be upheld, then the preference in Oundle’s draft Neighbourhood Plan for housing to be dispersed across 7 sites rather than the 3 cited in the Local plan (Policies EN 25, 26, 27), ought to be respected. We are therefore not convinced that the Local Plan is justified in ignoring this local alternative option. On page 33 where other neighbourhood plans and emerging plans are discussed, no mention is made of Oundle’s Neighbourhood Plan. We would suggest that this omission is in conflict with no.1 of figure 5 where one of the outcomes of the Local Plan is to “empower communities“.

Policy EN1 Spacial Development Strategy

CPRE is concerned to note that the distinction between ‘*Large Freestanding (service) Villages*’, ‘*Small Freestanding (other) villages*’ and ‘*Restraint Villages*’ seems to be driven by future housing potential. If the only villages where there are to be restrictions on building are the 4 cited as ‘*restraint*’, this seems to ignore the many historic villages more representative of Northamptonshire in terms of style and built form that have previously been designated as ‘*conservation*’ and/or ‘*restraint*’ villages. It is unfortunate that a countywide designation for rural settlements has not been adopted , hopefully this may be possible under the Unitary Authorities .

We consider that the villages listed below also fit the same criteria as the few currently identified as restraint villages. This policy is therefore unsound, and a new designation, giving greater protection to the wider list of villages, should be sought. On page 138, paragraph 8.19, it is stated that all rural housing requirements have currently been met. Therefore, unless there is a genuine need under rural exceptions, or for sustainability reasons, for additional dwellings, more villages could be given ‘*restraint*’ designation. CPRE considers that the following should be added to those in the restraint category:-

Blatherwyke ,Fineshade, Fotheringhay, Caldecote, Cotterstock, Deene, Hemington, Luddington, Liford, Pilton, Tansor and Wadenhoe

Policy EN3 Settlement Boundary Criteria – freestanding villages and Policy EN5 Development on the periphery of settlements with a defined settlement boundary and rural exceptions housing

CPRE does not consider that the loosening of the settlement boundary criteria can be justified. The claim that “virtually all villages incorporate transitional areas at the periphery between the built up core and the rural hinterland (open countryside)” (p.61, paragraph 4.37) is not entirely accurate. Even if this has occurred in some villages, the shift in policy puts the settlement pattern of small villages in open countryside (including ‘*shrunken*’ villages with Churches detached from the main settlement) at risk from development that could undermine the traditional character and heritage of the existing village or hamlet. We therefore do not agree that EN5: ‘*Development on the periphery of settlements with a defined settlement boundary*’ can be justified.

We consider the principal of defining boundaries as set out in EN3 to be unsound, and largely based on a series of exclusions. We would question the soundness of this policy to be upheld at Appeal, and we consider that it would be the cause of endless wrangling at Appeal as to whether or not a proposed development falls within the physical village envelope. A policy in this section, which would give greater weight to the protection of species between rural settlements, would be a more sound approach to the protection of the countryside between villages. This would provide protection against random development beyond approved sites within the settlement boundary, consistent with JCS policy 11 (2c). The Local Plan needs to recognise the importance of retaining areas of farm land as landscape buffers between developments in the countryside.

Under item a) of Policy EN5 we do not consider that the reason for rural exceptions is to “promote services within a village” is justified. This is therefore an unsound reason, and should be omitted from the policy .

Tresham Village

CPRE questions the contradictory reference to Tresham Garden Village, which, although it “falls outside the spatial housing and job requirements” (p.111, footnote 108), is taken into account by the Local Plan in its assessment of future job creation. We are not convinced that the planned 1500 houses for this Garden Village should continue to be ignored in the overall housing targets for the area. The alternative strategy of decreasing the housing requirements is then deemed to be justified. For example, the newly allocated housing alongside Rushden SUE to accommodate shortfalls from Irthlingborough and Rushden could be accounted for at Tresham Village in this Plan. This could then be redefined again over the next 10 years when it is evident whether or not the shortfalls can be met on the original sites.

Policies EN7 and EN8 Green Infrastructure and the Greenway

CPRE considers that Policy EN7 in its present form is unsound because it is not a true reflection of the same policy in the JCS. At Policy 19 of the JCS, it is stated at point (b) “Not permitting development that compromises their integrity and therefore the integrity of the overall Green Infrastructure network”. This aspect of protection of the green infrastructure corridors is not stated as part of the policy, and should be crucial to the whole principal of green infrastructure in terms of protecting and enhancing the existing infrastructure. Sadly, CPRE have noted that this policy has had little impact across the county, and consequently housing developments taking little regard of green infrastructure corridors been allowed at Appeal. Therefore, a consistent, sound policy reflecting the JCS in all respects is required.

The Greenway

CPRE continues to be unconvinced that the plans for *the Greenway* as a central infrastructure route across the area are effective, or justified, in its current aspirational (rather than pragmatic) conception. The Local Plan needs to provide more evidence about the exact route and practical form that this will take. The extent to which this might disrupt, or accommodate, existing agricultural land use and/or wildlife, in particular areas such as the Upper Nene Valley Gravel Pits SPA, needs to be specified more clearly if this to become effective in North Northants during the Plan period. Whereas CPRE has no objection to the intentions behind the development of

'Green Infrastructure corridors' (Policies EN7 & EN8), the Local Plan needs to explain more clearly how such corridors will be negotiated, protected and managed in ways that respect current agricultural land use and wildlife habitat.

An example of potential conflict in this respect we consider is the reference on p114, paragraph 7.26, to expanding the Rushden Lakes development west into the Greenway and further into the Green Infrastructure corridor where agricultural land and habits will all be put at risk.

Policy EN9 Local Green Spaces

CPRE welcomes the designation of Local Green Spaces, but considers that the policy and reasoned justification is currently unsound, because it appears to place the designation of Local Green spaces only with the Neighbourhood Plan process. This excludes all those communities that have decided that they will not prepare a Neighbourhood Plan from making such designations. CPRE therefore considers that the process of designation should also be available to Parish Councils and Parish Meetings, following public consultation, where no NP is proposed.

Economic Prosperity

P109 paragraph 7.9: References to the Oxford Cambridge Arc should be qualified, and therefore justified by stating that this is currently a non statutory designation upon which there has been no public consultation. Any direct impact upon this and future Plans would need to be consulted upon, and not considered as being part of any prior public consultation.

Local Plan Outcomes (Fig.5)

CPRE continues to have considerable reservations about the imbalance between different Local Plan Outcomes in Figure 5 (p. 42,43). The assumption that these Local Plan outcomes will all contribute positively to corporate outcomes seeking to achieve a good quality of life that is "sustainable, clean, healthy and safe" does not meet the test of soundness or consistency. Given the commitment in the Local Plan to job creation and a vibrant local economy arising from the logistics industry, the Plan fails to spell out what mitigation measures would be introduced in order to ensure that Local Plan Outcomes 2: '*Adaptability to future climate change*' and Outcome 3: '*Distinctive Environments that enhance and respect local character and enhance biodiversity*' can be achieved. Increased carbon emissions from a growing haulage industry that uses the transport corridors across, and the storage facilities within East Northants, need to be addressed with specific mitigation strategies if this plan is to meet the ultimate test of soundness for the people who live here.

A company limited by guarantee
Registered in England number 5564879
Charity registration number 1116687
Registered Office: 2 Stone Cottages, Newlands, Brixworth, Northampton NN6 9DN