

Objection by Long Buckby Parish Council – Planning Statement

Housing and Employment Allocation at Long Buckby Regulation 18 Draft West Northamptonshire Local Plan

Client: Long Buckby Parish Council



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1.0 Introduction

- 1.1 Land & Planning Consultants Ltd has been instructed by Long Buckby Parish Council (LBPC) to provide professional town planning advice and object to the housing and employment allocations off Three Bridges Road put forward at Long Buckby in the Consultation Draft Regulation 18 West Northamptonshire Local Plan (CDR18LP).
- 1.2 LBPC object in the most strongest of terms to what is an extremely ill-conceived proposal lacking in any merit and riddled with significant constraints.
- 1.3 LBPC is elected to represent the views of the Long Buckby community. These views are considered to be very important and it is requested that WNC take them into account when drafting the Regulation 19 Local Plan.
- 1.4 LBPC are not against the principle of a modest amount of development in Long Buckby but it needs to be selected via a robust evidence-based approach. This has not been the case and will be discussed in this objection statement.
- 1.5 Long Buckby has certainly played its part as a Primary Service Village and experienced significant growth along Station Road in particular. In total there have been 274 completions in Long Buckby between 2011-2021 according to the 2021 WNC housing land supply report and this led to significant growth in population by 600 people between 2011 and 2021. This figure will grow by at least 300 between 2021-2028 due to new developments with planning permission.
- 1.6 Aside from an extended train station car park and affordable housing, the developments have delivered limited improvements to the infrastructure of the village. Before WNC allocate land to the village in its Regulation 19 Local Plan, it is requested that it carries out a thorough review of the capacity of the village including a full TIA so WNC can fully appreciate all the constraints to development, not least the lack of opportunities to improve infrastructure within the village as well as roads into and out of the village.

2.0 Principles of Successful New Settlements & Identification

- 2.1 Paragraph 3.5.6 of the CDR18LP refers to a new settlement. This is a surprise as this ill-conceived notion was rejected after the publication of the Options Consultation (Regulation 18) back in 2021.
- 2.2 Whilst WNC carried out some studies as an evidence base for the Spatial Options Consultation at the time, there is a clear lack of any evidence base for identifying potential new settlements. Without such evidence, identifying new settlement sites wholly is inappropriate and causes unnecessary anxiety to the residents of Long Buckby.

National Planning Policy Framework

- 2.3 It is considered that WNC's approach is contrary to plan preparation guidance in the NPPF which states:

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.” (paragraph 32)

- 2.4 Furthermore, it would appear that at this stage WNC has failed to comply with the requirements of guidance in the NPPF on new settlements which states:

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) ensure that their size and location will support a sustainable community with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans*

and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;

- d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)³⁸; and*
- e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.” (paragraph 77)*

- 2.5 It is clear that criteria a) to e) has not been properly considered. As will be demonstrated in this statement, the opportunities for investment in necessary infrastructure will be very limited. The suggested site has low economic potential and is likely to rely on DIRFT and Daventry for employment. On the environment, the constraints are such that a deficit in gains is more likely.
- 2.6 The size and location of the proposed development is likely to cause significant congestion and overload existing services which are already at full capacity.
- 2.7 No design code or expectation has been set out.
- 2.8 No assessment has been made of likely rates of delivery and this is a grave concern as historic completion rates in both Long Buckby and Daventry have been slow.
- 2.9 Lastly, WNC has failed to engage with the local community. LBPC was not aware of this proposed allocation prior to its publication.

Site Identification Best Practice

- 2.10 The ‘Options’ version of the proposed new settlement was based upon the SHLAA following a representation by a landowner/promoter. Whilst the availability of land is important, it is only one factor of a myriad of criteria that ought to be applied to the site selection process.
- 2.11 Since then, WNC has commissioned a SA and SEA from Urban Edge Environmental Consulting to assess site options (October 2021). However, it is basic and based on an arbitrary points system against 17 objectives. There is no key and no explanation and thus meaningless. It is impossible to determine from this assessment whether it was the best site within West Northamptonshire (along with the remaining proposed allocations) to meet housing needs up to 2043.
- 2.12 It is clear that it lacks a comprehensive assessment of all the Social, Environmental and Economic constraints and thus can only fail in demonstrating that the housing allocation is sustainable development.

- 2.13 Accompanying LBPC's objection to the 'Options' version of the proposed new settlement were two documents to assist WNC. The TCPA in association with the DCLG and titled "Best Practice in Urban Extensions and New Settlements". Whilst it is dated 2007 it remains highly relevant today. The 2nd document was Bassetlaw's New Settlement Study produced by renowned consultants ADAS and is a high-quality example of best practice. Since then, the government has set up a task force headed up by Sir Michael Lyons.
- 2.14 Prior to identifying any potential new settlement option WNC should have adopted this best practice. The more constraints there are to a development, generally the more harm to the environment it causes and additionally the greater the financial costs to develop. In this case, it is considered to be fundamentally unviable.
- 2.15 It is evident from the Inset Map for Long Buckby that the housing allocation is significantly reduced from the 'Options' version and extends to circa 60+ hectares. Accordingly, its net capacity will be between 750-1000 homes maximum depending on the constraints identified. This is not a new settlement and the notion put forward in paragraph 3.5.6 of the CDR18LP is a fallacy. In order to be self-contained, the minimum size would need to be 5,000 dwellings as advocated by LBPC in its previous objection and in reality, 10,000 dwellings is the minimum as required by the 2025 government task force.
- 2.16 Given the fact that the proposed housing allocation cannot be a new settlement then by definition it will be reliant upon the infrastructure of Long Buckby which has not been assessed with catastrophic consequences for the village.

3.0 Sustainability, Physical & Technical Constraints

- 3.1 LBPC have grave concerns over sustainability as well as the physical and technical constraints to development. The lack of evidence base suggests that these constraints have not been properly researched and certainly haven't been compared to any alternative new settlement options.

Sustainability

- 3.2 Whilst it looks like a laudable objective on paper; putting development next to a train station, is not the panacea to create sustainable development. It is not as basic or as simple as this. Commuting by train only works if it goes straight to major local employment areas. The strong evidence in Long Buckby is that it doesn't as only 0.6-0.8% of all journeys to work according 2021 census data are made on the train, whereas over 50% are made by car or van.
- 3.3 The mere existence of a train station does not mean new inhabitants will use it. WNC needs to look a little wider at the potential for public transport usage in order for a new settlement to be sustainable. WNC admit in the CDR18LP that Daventry is the nearest main settlement for a range of services, facilities and employment. Yet it doesn't have a train station and so train journeys to Daventry are not possible. Buses to Daventry are hourly but there is no evening, night time or Sunday service and it's a slow journey compared to a car (11 mins vs 32 mins), so far less attractive especially when car parking is so convenient in the town. The overwhelming evidence is that circa 85% of journeys will be made by car as was made clear by the previous transport assessment by Tutum Consulting commissioned by LBPC that found a maximum of 5% of all journeys would be by train.
- 3.4 Given the lack of employment opportunities at Long Buckby, it is inevitable that a new settlement would simply create a very large housing estate and almost be wholly reliant on private car use. The centre of Long Buckby will be too far for the majority of new inhabitants to walk, especially uphill. The reality is that it would be one of the most unsustainable housing allocations in West Northamptonshire and its carbon footprint would simply be unacceptable.
- 3.5 Aside from encouraging unsustainable private car use, the location of development does not make any sense. Physical boundaries are extremely important when allocating land to prevent urban sprawl. The railway is an extremely strong physical boundary to contain development. Breaching this boundary simply encourages urban sprawl into the open countryside and significantly erodes the important gap between Daventry, the latter of which is already planned to sprawl up to the A5.
- 3.6 It is clear from a quick analysis of the village from aerial photography that there are substantially better and more sustainable sites that could be allocated for more modest development to meet local needs that would be far more appropriate and better relate to the CDR18LP strategy of concentrating development in towns.

Highway Constraints

- 3.7 WNC conceded previously that off-site highway works is a weakness and admitted that the necessary transport work had yet to be undertaken in its Spatial Options Consultation document. This issue does not seem to have been resolved.
- 3.8 As found previously in Tutum Consulting's report commissioned by LBPC, the existing infrastructure is inadequate. Three Bridges Road as the name implies is extremely constrained with numerous narrow sections and one vehicle passing pinch points. It is frequently closed for emergency repairs and further significant traffic could result in this ailing road passing breaking point.
- 3.9 Any road/bridge widening or new bridges costs millions of pounds and a new railway bridge would cost in excess of £50 million. Accordingly, highway capacity and the ability of the existing infrastructure must be investigated thoroughly before proceeding with this housing allocation any further.
- 3.10 The above evidence would suggest that the road infrastructure constraints and costs are simply prohibitive and render such a proposal unviable. A full TIA is required of any Long Buckby housing allocation prior to the Regulation 19 version of the Local Plan to include an assessment of all local roads.

Highway Safety

- 3.11 The Tutum Consulting report identified some serious highway safety concerns with the existing A5 junction and given the significant increase in traffic and queuing from 750-1000 homes, then these issues will be exacerbated. The existing A5 junction at Long Buckby Wharf is a black spot according to traffic accident data, especially with drivers trying to cross the A5 to get to Daventry. Whilst a remodelled junction is proposed under the Daventry SUE, there are grave doubts over its financial viability. In terms of timing, given the SUE's circa 24 year phasing, it seems unlikely that such a roundabout junction will be open by the end of the plan period in 2043.
- 3.12 Locally, the Three Bridges Road is also notorious as being narrow in places and a significant highway safety issue unless a new road is built. As an addendum to Tutum Consulting's report, it has since been confirmed that Three Bridges Road is a 'C' class road which is a local classification and not recognised nationally.

Village Capacity

- 3.13 As stated in the TCPA guide to New Settlements, every town has its limits, in this case a village. Long Buckby has seen significant growth over the last decade with an increase in population by 600+ people. This has already put a significant strain on local infrastructure and as reported in the previous Tutum Consulting report, the existing car parks in the village centre are already at full capacity.

- 3.14 The majority of people would drive to Long Buckby centre as the walking times, especially south of the railway would be beyond the average distance that people are prepared to walk in the UK notwithstanding being uphill! The congestion caused to the centre of Long Buckby from 750-1000 homes would be severe and could cause gridlock. The centre was not designed for such traffic and there would be nowhere to park. Not all problems with new settlements can be solved, even with government funding. In this case, there is no solution to increasing car parking capacity at Long Buckby. Accordingly, a new settlement would cause detrimental harm to the quality of life for existing Long Buckby residents.
- 3.15 Local facilities and amenities are also at full capacity. Local residents have reported that the medical practice has capacity issues with long waiting times to get an appointment. The same for dentists and other facilities, amenities and services in the village. There is no space for the existing infant and primary schools to expand and there is no secondary school in Long Buckby which should be a pre-requisite for such a major housing allocation. The Parker E-ACT secondary school in Daventry is already at capacity and any spare capacity at DSLV will be used by existing planning permissions. A secondary school site is reserved for the Daventry SUE but is likely to be full from the 4000 houses allocated to it and unlikely to be open for at least 10 years. Guilsborough is close to capacity so WNC are currently proposing a long commute to Northampton School in Moulton but this is already at capacity per year group so where will the children go?
- 3.16 Environmental capacity is another issue and discussed under heritage impact below. An environmental impact assessment has not been undertaken to support the housing allocation and it is considered that one is necessary together with a village capacity study before any housing allocation could be supported or justified.

Heritage Impact

- 3.17 The proposed housing allocation would impact the Long Buckby Conservation Area due to the inevitable congestion caused and would have a direct detrimental impact upon the Grand Union Conservation Area at Long Buckby Wharf (see Appendix 1). The impact upon the landscape setting as well as the significant traffic congestion will cause substantial harm to Long Buckby Wharf's tranquil setting.
- 3.18 Long Buckby village has 34 listed buildings and there are an additional 4 at Long Buckby Wharf. The remains of Long Buckby Castle are also a Scheduled Monument. Given the grave concerns over traffic congestion and the environmental capacity of Long Buckby village centre where most of the listed buildings and Conservation Area are located, substantial harm to the character of these heritage assets again would be unavoidable.
- 3.19 It is considered that such harm would be contrary to guidance in the NPPF which states:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. (paragraph 212)

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a. *grade II listed buildings, or grade II registered parks or gardens, should be exceptional; “ (paragraph 213)*

- 3.20 The listed buildings in Long Buckby are an irreplaceable resource and should be conserved for future generations to enjoy and learn from their history. It is considered that there are better alternative locations for new housing development in West Northamptonshire and therefore the public benefits do not outweigh the harm identified. WNC has also failed to undertake a heritage impact assessment which again is considered to be a pre-requisite for such a major housing allocation.

Floodplain & Drainage

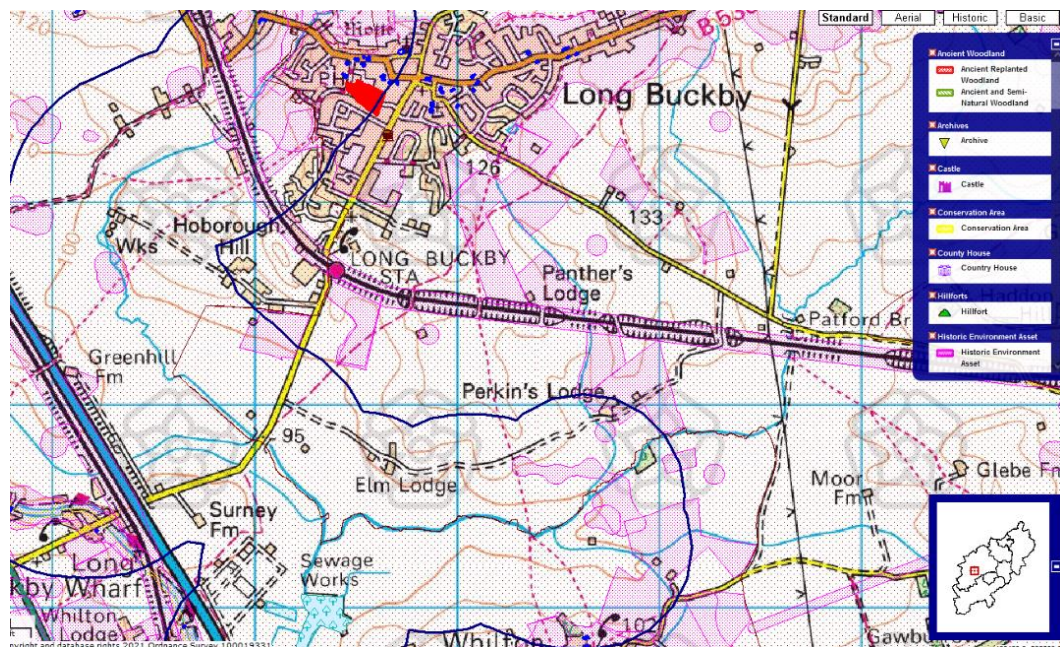
- 3.21 Again, as recognised in the Spatial Options Consultation document, the flood plain is a significant weakness of this proposed housing allocation given the extent of Flood Zone 3 illustrated in Appendix 2 and will pose a major constraint to the size and location of development.
- 3.22 However, it is considered that the flood plain issue poses more serious issues that do not appear to have been considered. The development of 750-1000 homes will increase run off and create an enormous drainage challenge. Given the topography of Long Buckby, the increase in surface water running downstream is likely to cause an enlargement of flood plain zone 3 and could blight Long Buckby Wharf and Whilton Locks.
- 3.23 Whilst developers will seek to use SUDS, these are not always possible and the geology of Long Buckby is generally boulder clay which would rule out soakaways. Flood attenuation storage (pond or more likely a lake) may well be possible but these still require an outfall into a watercourse and accordingly will be a significant challenge to overcome.
- 3.24 It is considered that before any more progress is made on the Local Plan that a flood risk assessment and drainage capacity study is essential. Foul drainage should also be assessed as the Environment Agency has advised of capacity concerns at Long Buckby’s water recycling centre.
- 3.25 As with heritage assets, there are better locations without such major constraints.

Environmental Health Constraints

- 3.26 There are two major sites that affect environmental health.
- 3.27 The most obvious of these is the Whilton Sewage Treatment Works located east of the M1 and to the south of Three Bridges Road. The works are the subject of numerous complaints due to foul smelling odours. Anglian Water operates a cordon sanitaire in line with other water authorities and this extends up to 400 metres which affects the proposed allocation.
- 3.28 In relative close proximity to Whilton Sewage Treatment Works is Whilton Mill Karting. Together with noise from the M1, as with the aforementioned works, there will need to be a sufficient buffer zone in order that residents are not adversely affected by noise in accordance with WHO standards. Whilton Mill Karting is a major local employer and stages the British Karting Championships. It is important for the local economy that it is not threatened by the proximity of new housing.

Archaeology

- 3.29 As confirmed in archaeological studies on the Station Road sites, This area of Long Buckby has a medieval and Roman history. The proximity to the A5 Watling Road increases the chance of important archaeological artefacts as this was of course a Roman road.
- 3.30 Evidence of medieval activity is still very prevalent today with ridge and furrow farming landscape still in tact around Long Buckby as confirmed by the former County Council GIS map below, e.g. the purple outline patches.



- 3.31 As confirmed by Historic England, ridge and furrow field systems are heritage assets and should therefore be protected. Once they have been developed, they are lost forever along with an important educational resource.

Other Constraints

- 3.32 There will be many other constraints to development but less prohibitive ones yet still important and need to be properly assessed such as landscape impact and ecology.
- 3.33 In terms of landscape impact, former DDC's landscape character appraisal (2017) defined Long Buckby as "Undulating Hills and Valleys". Long Buckby is a hilltop village with associated rolling countryside and far reaching views and so development, especially to the south of the railway, will have an adverse impact upon this attractive landscape and setting of this historic settlement.

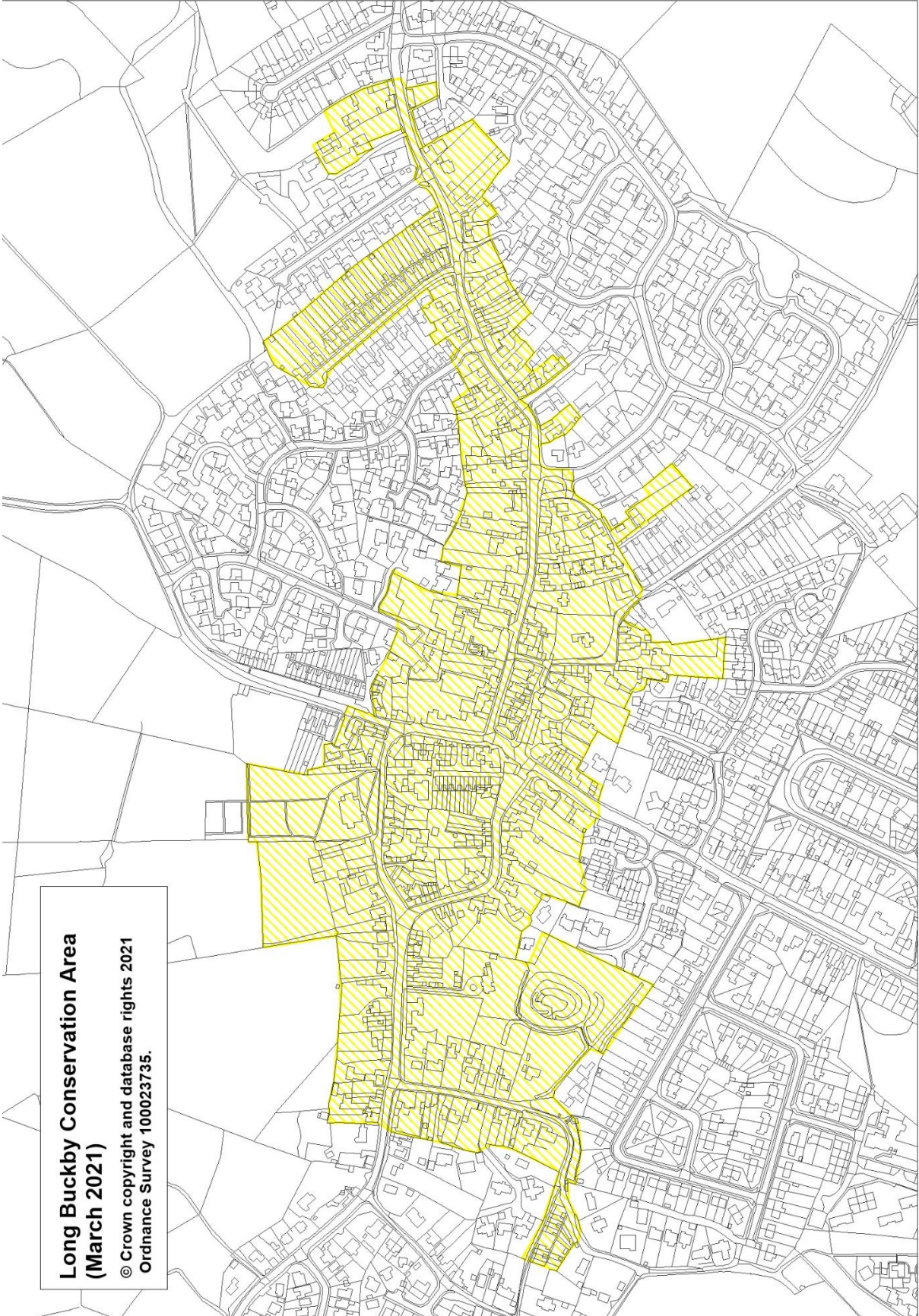
4.0 Employment Allocation Objection

- 4.1 Simply allocating land for employment is not sustainable without first establishing an evidence base to justify the location, need and type of employment development. It seems this evidence base is lacking.
- 4.2 If there was a need for expanding the existing employment area which was the former Maclaren factory there might be a case for supporting some limited expansion. However, WNC needs to assess the existing occupiers as part of this assessment. It is evident that some are for leisure use such as a swimming pool school and a gym which indicates a lack of demand for industrial units or offices. There is also a large agricultural business and this should be discounted as the agricultural industry will generally exercise their PD rights as significantly cheaper than leasing an expensive private industrial unit or warehouse.
- 4.3 Even if it was justified, there would need to be tight controls on the type of development and use. For example, warehousing would be prohibitive. There is a height restriction of 3.7m and also a width restriction at the railway bridge towards the A5 which would prevent modern distribution HGVs. This would force HGV traffic into the village which would cause harm to the historic fabric as well as traffic congestion as due to on street parking; several sections of the village are single file.
- 4.4 The only acceptable mitigation would be a bypass at circa £100 million or a wider and deeper railway bridge at circa £50 million. Neither of these options are financially viable.
- 4.5 Even without warehousing, a proper assessment needs to be undertaken of whether Three Bridges Road, i.e. a 'C' class of road is capable of accommodating significant additional traffic and HGV traffic in particular. The same applies to the junction with the A5 which has a notorious accident record.
- 4.6 Finally, save for environmental health, the same constraints apply to this employment allocation as identified for the housing allocation in the previous section of this statement.

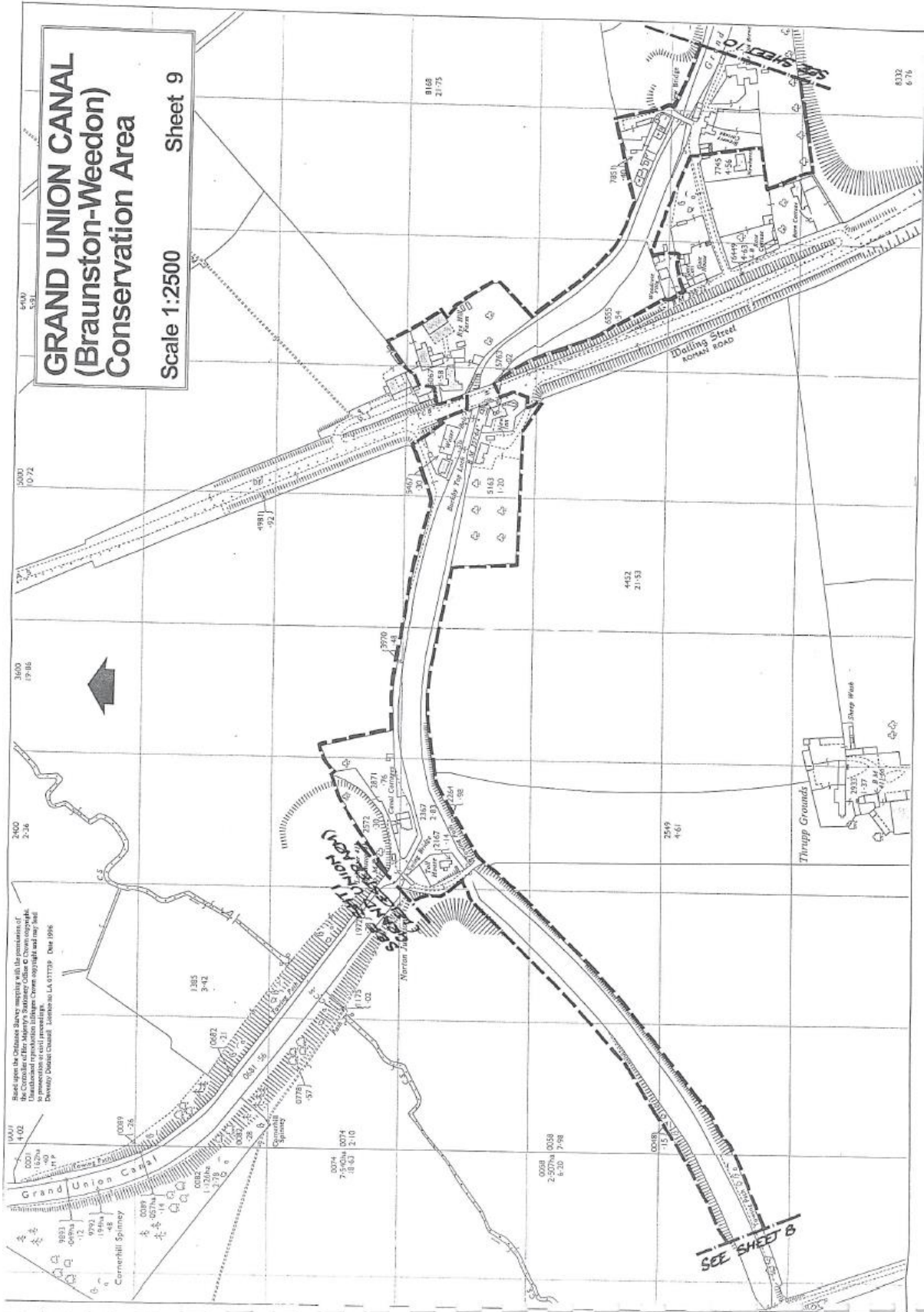
5.0 Summary & Conclusions

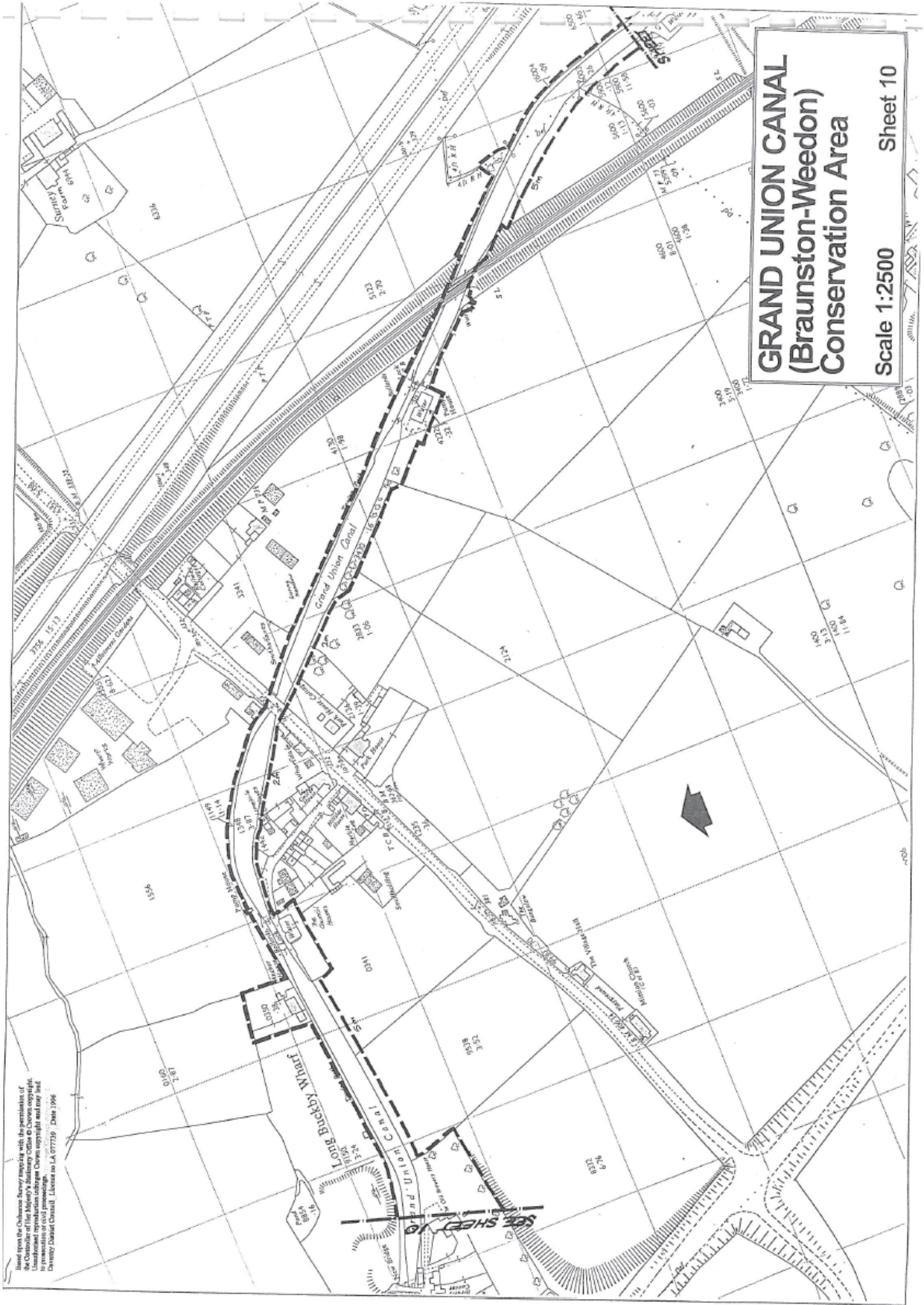
- 5.1 The proposed housing allocation appears to be a first phase of a new settlement yet WNC has yet to complete a study on new settlements or prepare an adequate evidence base to justify this site. The proposal therefore lacks any careful site selection process based on any credible evidence and is thus contrary to national guidance in the NPPF, causing unnecessary anxiety to Long Buckby residents.
- 5.2 A housing allocation of up 1000 dwellings is of an insufficient size to be self-sufficient and thus will rely on the facilities in Long Buckby which are either close to capacity or absent such as a secondary school.
- 5.3 Long Buckby is not a sufficiently sustainable location for a new settlement. Less than 5% of journeys would be made using public transport and the expert evidence finds that the vast majority of journeys would be via private car.
- 5.4 Three Bridges Road is a category 'C' road that is decaying and not suitable for such traffic. It is certainly unsuitable for the HGV traffic the employment allocation would generate. Height restrictions to the A5 junction would mean heavy lorries going through Long Buckby causing congestion and harm to the historic fabric.
- 5.5 LBPC have grave concerns over highway safety. Three Bridges Road has blind bends and is narrow in places and its junction with the A5 has a history of serious road traffic accidents. HGV traffic through Long Buckby would also threaten pedestrian safety with the necessity to mount pavements etc.
- 5.6 Long Buckby is close to reaching its full environmental capacity following significant growth over the last 10 years. There are no solutions to improving roads or car parking within its already congested village centre. The development of 1000 homes would also cause substantial harm to the character and setting of Long Buckby/Long Buckby Wharf's heritage assets comprising 38 listed buildings, 2 conservation areas and a scheduled monument.
- 5.7 The allocations are severely constrained by the vast area of land located within flood plain zone 3 which poses a significant risk of development causing more areas to flood making Long Buckby Wharf and Whilton Locks uninhabitable. A cordon sanitaire around the sewage treatment works is a further constraint to the viability of a new settlement and the land necessary to make one sustainable.
- 5.8 There are significant other constraints to development such as archaeological heritage assets, landscape impact and ecology.
- 5.9 In conclusion, the allocations for development are ill-conceived, unsustainable and will simply encourage uncontrolled urban sprawl due to the lack of containment. The constraints far outweigh any benefits and it is not possible to mitigate against the lack of infrastructure and necessary highway improvements are unviable. It is considered that both allocations should be deleted as can't be substantiated.

Appendix 1 – Long Buckby & Grand Union Canal Conservation Areas



**Long Buckby Conservation Area
(March 2021)**
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Ordnance Survey 100023735.





Appendix 2 – Long Buckby Floodplain Map

Flood map for planning

