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Return by e-mail

REF: WNSP Consultation – Rothersthorpe Parish Council Response

FAO: The returning Officer

Please accept this letter as a formal response from Rothersthorpe Parish Council regarding to the West Northamptonshire Strategic Plan – Spatial Options Consultation.

This return will focus on the following items:

1. Village feedback & Public Open Session
2. The shortlisted spatial option **1g site 228 South M1 Junction 15a – Employment**
3. The wider impact of development around site 228 that does not form part of the WNSP
4. Favourable development for Rothersthorpe Parish
5. Appropriate vision for guiding development and growth in West Northants
6. Corporate Plan Priority – Green & Clean
7. Corporate Plan Priority – Connected Communities
8. Corporate Plan Priority – Thriving Villages & Towns
9. Corporate Plan Priority – Economic Development

1) Village Feedback & Public Open Session

On the 29th November 2021 Rothersthorpe Parish Council held a Public Open Session at Rothersthorpe Village Hall. Its aim was to summarise to residents the objectives of the WNC Strategic Plan Consultation and how the “Short Listed” Spatial options (1g site 228 South M1 Junction 15a – Employment) along with “Long Listed” Sites 229, 230 and 80 (Residential) could change the landscape of Rothersthorpe up to 2050 and beyond.

With over 60 residents in attendance there was a unanimous agreement that official communication of the WNC Strategic Plan Consultation by West Northamptonshire Council had been poor and not well publicised, in particular for those residents who have no access to social media or those who do not follow WNC on social Platforms. For many residents the only knowledge they had of the consultation was via communication from the Parish Council.

Rothersthorpe parish Council has listed feedback and comments received by villagers regarding the “Short Listed” Spatial option 1g site 228 South M1 Junction 15a – Employment as well as “Long Listed” Sites 229, 230 and 80 (Residential) that should be taken into consideration by WNC at the conclusion of this consultation.

- a- Loss of productive arable land
- b- Undermining of local tenant farm businesses and employment
- c- Negative landscape impact
- d- Loss of open field wildlife habitats and ecology impacts
- e- Negative impacts to ancient Osier Reed Beds located on the eastern fringe of the proposed site
- f- Negative impact on the Grand Union Canal Conservation Area (Buffer)
- g- Negative impact on local tourist businesses and employment
- h- Noise pollution associated to a 24-7 operational supply chain / industrial development
- i- Light pollution
- j- Pollution (vehicles, building operations, waste, Carbon footprint of physical warehouse construction)
- k- Cumulative impact that effects development within existing parish boundaries
- l- Traffic impact on Highway’s network, Motorways and local villages
- m- Loss of existing public rights of way
- n- Increased flooding risk onto North Street Rothersthorpe
- o- Proximity to significant historical earthworks, land features and recorded sensitive archaeology assets
- p- Impact to the rural character and history of the village
- q- Loss of identity as the village is consumed into the town with no greenspace to preserve village boundaries

2) The shortlisted spatial option 1g site 228 South M1 Junction 15a – Employment

Rothersthorpe Parish Council agree that a robust strategic plan is required to assist in identifying areas of development to support the natural growth of the local population, as well as encouraging businesses and industry to enhance the local economy, ensuring West Northamptonshire is fit for purpose for future generations.

Rothersthorpe Parish Council also acknowledge that from a Strategic standpoint Site 228 offers large potential benefit for developers due to proximity to the motorway junction at 15a.

However, we strongly urge that careful consideration must be taken whilst identifying suitable land that is fit for its intended purpose, instead of relying solely on “calls for land” and blindly using ariel mapping tools to carve up proposed sites without having an in depth understanding of local topography, local heritage and areas of historic importance and impacts to the rural character of existing small domicile settlements.

Given the historic and archaeological significance of the village of Rothersthorpe, with aspects such as the Berry Ringworks (Late Viking/Norman age fortress remains under Article 4 protection from the House of Lords), Roman remains surrounding the village, Iron Age Settlements and a documented medieval tax collection route from Northampton to the former Chequers pub you can see Rothersthorpe is a small village with a BIG history. It would be wise to either seek to protect or enhance these features alongside any future development proposals, Local or Strategic.

Therefore, Rothersthorpe Parish Council **strongly object** to site 228 being considered as a potential growth area. We do not consider this area as being developable without detrimentally impacting the surrounding village, local history and wider biodiversity.

Whilst we are not objecting to “development options in principle”, this site in the current location is not fit for purpose and its sheer size would consume the existing village up to 3 times in size.

Constraints to development - First and foremost the existing water runoff from the fields on the south west boundary causes extensive flooding at the bottom of Church Street & North Street Junction on a regular basis, even with natural drainage ditches and hedgerow ditch widening this has not alleviated the issue and multiple times during a 12-month period the scale of flooding causes this road to become impassable by a vehicle.

Part of the field near the eastern edge alongside the Grand Union Canal is a wetland area and is known to be waterlogged and marshy throughout the year.

With natural land drainage replaced for concrete and tarmac, flooding will likely become worse both on the developed site and within Rothersthorpe Village.

There are strategic 250mm high pressure gas & oil pipelines that cross the land from the Blisworth Arm Monitoring Station which would require a significant easement from a safety point of view as well as access for inspection and works maintenance. The pipe locations would dictate the sizing and placement for any large warehousing or industrial units and may make the site near J15a non-viable. The current sewerage pumping station and pipeline is within the boundary of site 228 and once again easement would be required and would dictate the placement of any building. The existing sewerage and pumping network across the village is at maximum capacity and ANY development would require an extensive overhaul to ensure it is fit for purpose.

Location - The land is strategically important to Rothersthorpe and acts as a natural separation gap between Urban Northampton and the M1 that helps Rothersthorpe in being defined as a “Small Rural Village”.

A protecting corridor of greenbelt that helps maintain the rural character of a domicile village is spelled out in the Ministry of Housing, Communities & Local Government National Planning Policy Framework 2021 Chapter 13 ensures the purpose of Greenbelt is to:

- a) To check the unrestricted sprawl of large built-up areas
- b) To prevent neighbouring towns and villages from merging into each other
- c) To assist in safeguarding the countryside from encroachment
- d) To preserve the setting and special character of historic towns or villages; and
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The WNC Strategic Plan Consultation “Short Listed” Spatial options (1g site 228 South M1 Junction 15a – Employment) along with “Long Listed” Sites 229, 230 (Residential) fall contrary to The National Planning Policy Framework 2021 “Protecting Greenbelt” especially in the case of a Strategic Plan where ALL other options have **not** been considered.

There are other sites along the M1 corridor that are strategically placed and are better suited to facilitate “employment hubs” that both minimise the wider impact as not to encroach or butt up onto existing domicile villages.

If strategic industrial and supply chain development is allowed to expand south of the M1 unchecked this will create an overbearing physical presence that will dominate the rural landscape for anyone looking south from the town as well as from Rothersthorpe’s high vantage point that would look over any industrial developments where bunding and landscaping is not achievable.

The existing green corridor acts as a natural sound buffer between the M1 and Rothersthorpe. Any sizable development has the potential to refract and increase sound back towards the village.

History (scheduled, listed and conservation areas) - Rothersthorpe village is only one of two local settlements to contain a scheduled ancient monument along with Grafton Regis.

Historic England lists this scheduled monument as item 1010253 The Berry Ringwork is the site of a ringwork which stood at the centre of the medieval village of Rothersthorpe. The site is an irregularly shaped enclosure measuring approximately 120m from east to west and about 90m from north to south. The ringwork is delineated on the north and west sides by a wide ditch between 2.5m and 4m deep. There are also remains of an inner rampart in the north east corner and at the southern end of the site. Undulating features in the west of the interior of the ringwork indicate the locations of former buildings. On the eastern side of the interior remains of ridge and furrow ploughing can be seen.

The furthest eastern point of the Berry is less than 100m from the west boundary of site 228 and is visible on (MAP ANNEX A)

Rothersthorpe is also only one of two Northamptonshire villages to have a Saddle Back Church along with Cold Higham. Site 228 offers exceptional views of this circa 13th Century Church from multiple vantage points.

The land at site 228 & 229 is historically significant and is understood to have been a battle ground defended during the Danish invasion of Britain. The Danelaw moved South West across the country but was halted approximately in the region of the Watling Street Roman Road (Now the A5). It is

well known that the Danes set up a large encampment at Danes Camp (Hunsbury) of Northampton and 'Torp' (Rothersthorpe, Not a Viking Village name) would have been a prime location of defence. The Ancient Monument – The Berry is likely to have been used as a fortified area of defence, and the fields between Northampton and Rothersthorpe would have been a bloody battlefield.

It is important to retain the 'Danefield Gap' to the North of Rothersthorpe as this helps to describe the origins of the settlement and the history of the Danes invasion of Britain.

Site 228 is likely to contain a great deal of sensitive archaeology which is of significant local and regional importance. The site is known to contain 2 designated Iron Age settlements which are recorded as important Heritage Assets and are visible on (MAP ANNEX B) & (MAP ANNEX C – LIDAR)

Part of site 228 Northern peripheral near Junction 15A M1 is known to be the site of a Roman Villa and is recorded as an important Heritage Asset Figure 1 and can be identified on (MAP ANNEX C – LIDAR).

It is important to recognise the significance of this and to preserve the special character of the area by keeping Rothersthorpe independent from Northampton. Without causing detrimental damage to heritage assets and sensitive archaeology this may make the site near J15a non-viable.

It is also important to call out the adjoining site 229 has clearly defined earthworks, a Saxon Holloway, ridge and furrow and multiple sites of archaeological assets which should also be retained to preserve the villages special character and to retain that green belt buffer between the village and the M1, visible on (MAP ANNEX B) & (MAP ANNEX C – LIDAR)

Areas surrounding site 228 form documented conservation areas as well as the wider Grand Union Canal Conservation & Buffer Zone. The Northampton Arm of the Grand Union Canal contains an impressive flight of lock gates and bridges that all retain a listed status with Historic England. The canal sits on high ground with impressive views across open arable land with fine views of Rothersthorpe Village and Rothersthorpe's saddle back Church nestling in the valley beyond.

Site 228 will be immensely detrimental to the character and amenity of the Grand Union Canal as well as the surrounding Rothersthorpe conservation areas. This particular location to the east of the proposed site would be severely degraded if it became consumed by large warehousing and infrastructure. The visual impact of a vast warehousing site against these areas of conservation interest and the impact to leisure and tourism along the Northampton Arm of the Grand Union Canal need to be carefully considered for ALL planning applications.

Biodiversity - This area provides a thin but diverse corridor of green space, trees, hedgerows and watercourses that are all essential to sustain natural habitat. It provides just enough space to allow the movement of animals and birds and it provides essential nesting and habitat sites necessary to sustain life.

Site 228 as well as fields south of Rothersthorpe up to Gayton are an extremely important area of traditional habitat of native and migratory species, such as many species of birds of prey, Golden Plovers, Lapwings, skylarks and Linnets that have all been observed in the area inclusive of site 228 over the last 12 months. These birds are classed as endangered species.

Fields in and surrounding site 228 are used for feeding and form a migratory stop over for birds from the Upper Nene Valley Gravel Pits SSSI which is located approximately 7km away from site 228. The SSSI is classified as a site of international importance hosting flocks in excess of 20,000 migratory birds.

Part of the eastern fringe of site 228 near the Canal and Junction 15A contains the Historic Osier Reed Beds which provide a unique wildlife habitat and is part of a protected landscape.

The loss of open field habitats for breeding and grazing birds and other flora and fauna can not be compensated for by adding bunding, water levelling ditches and landscaping to large developments. Therefore, consideration should be made to designate the site as an area for arable crop, biodiversity/wildflower and re-naturalising strips, the planting of woodland and improved wildlife habitat so it may help combat global warming, aiding in the reduction of carbon emissions and to help attenuate the pollution and noise caused by the M1. This approach would further support the governments carbon goals.

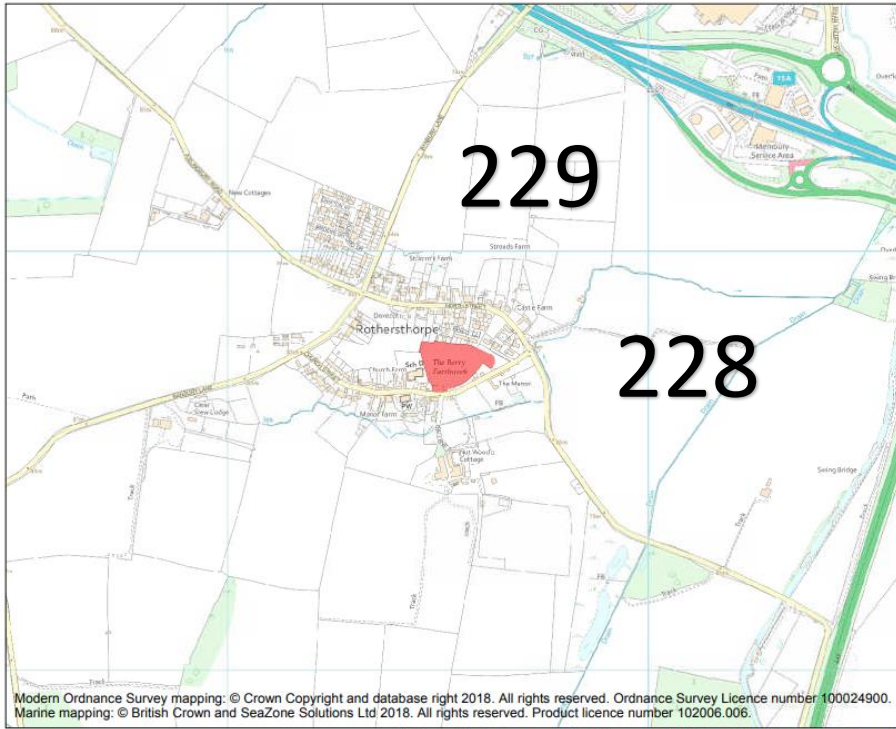
Over the past 10 years Rothersthorpe has been severely impacted by a significant increase in light pollution from the expansion of industrial and distribution warehouse developments on the peripheral of Northampton such as Swan Valley, Pineham, Grange Park & Nether Heyford.

As quoted on the online consultation “required need in size for development will be comparable to the area of Panattoni Park at Junction 16” (sic). Site 228 will severely impose more light pollution to the surrounding area, to the detriment of the village and to the detriment of wildlife, particularly roosting birds and nocturnal species such as bats and owls. The artificial glow created by the 24-hour illumination will have a severe impact the local area.

Public Rights of Way – Site 228 provides the ONLY traffic free safe footpath route from Rothersthorpe to Northampton connecting to the Northampton Arm of the Grand Union Canal through the Osier Reed Beds.

This right of way needs to be retained at all costs as all other routes to Northampton or surrounding villages can only be accessed by walking on non-lit national speed limit single carriageways.

MAP ANNEX: A – The Berry Ringwork



Heritage Category: Scheduling
List Entry No : 1010253

County:
District: West Northamptonshire
Parish: Rothersthorpe

Each official record of a scheduled monument contains a map. New entries on the schedule from 1988 onwards include a digitally created map which forms part of the official record. For entries created in the years up to and including 1987 a hand-drawn map forms part of the official record. The map here has been translated from the official map and that process may have introduced inaccuracies. Copies of maps that form part of the official record can be obtained from Historic England.

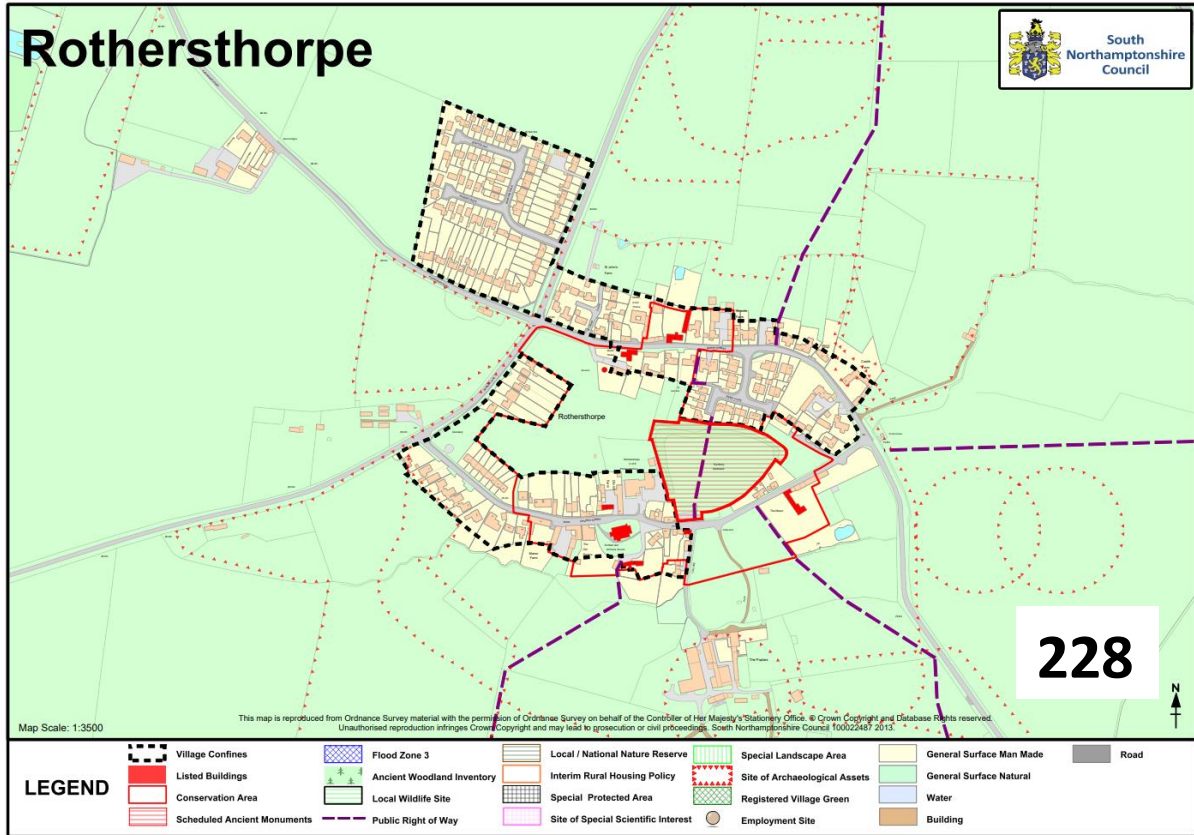
This map was delivered electronically and when printed may not be to scale and may be subject to distortions. All maps and grid references are for identification purposes only and must be read in conjunction with other information in the record.

List Entry NGR: SP 71544 56729
Map Scale: 1:10000
Print Date: 16 December 2021

Name: The Berry ringwork

This is an A4 sized map and should be printed full size at A4 with no page scaling set.

MAP ANNEX B – Geographical and Policy Constraints for Rothersthorpe Parish



MAP ANNEX C – LIDAR Mapping of Rothersthorpe Parish (Highlighting WNSP Sites 228 & 229)

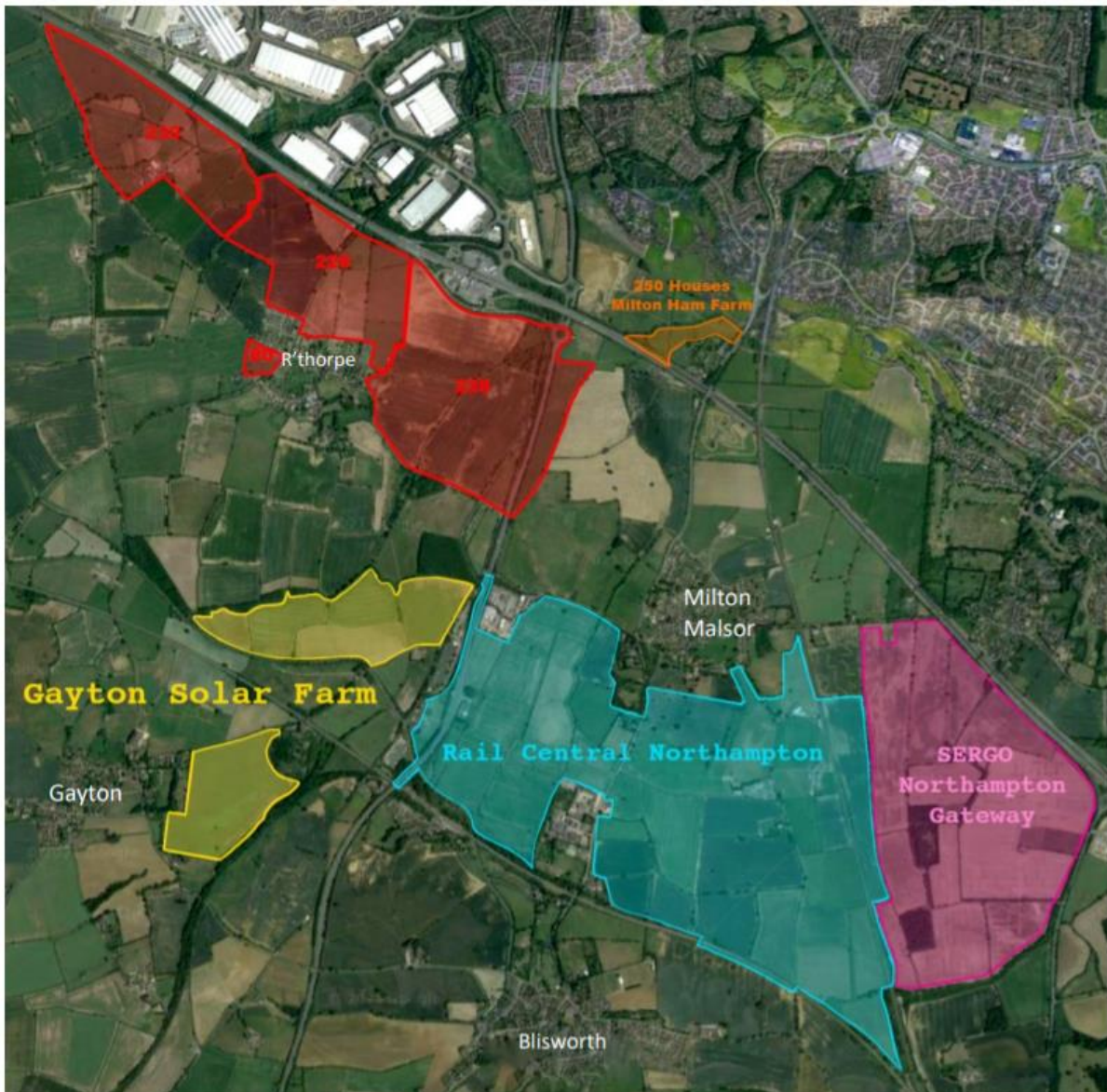


3. The wider impact of development around site 228 that does not form part of the WNSP

Rothersthorpe Parish Council is disappointed that the WNSP does not take into consideration large strategic developments currently at the planning phase or “in pipe” that fall out of scope of this consultation. Only with these sites mapped side by side against the proposed spatial options can you appreciate the wider impact this level of growth could have.

We question the need for additional growth, the proposed figures provided from WNSP do not include the capacity of these “out of scope” developments or demonstrate the current shortfall in existing warehouse occupancy?

In regard to Rothersthorpe and proposed Site 228 as a sole one-off development could be considered as having a negligible impact at face value, however when paired against ongoing “out of scope” strategic developments you can see how much greenbelt south of the M1 is being consumed by industrial and warehouse developments that stretch the total length of junctions 15, 15a and 16.



With the current construction of SEGRO Northampton Gateway Rail Freight Terminal, the proposed Rail Central at Milton Malsor, the proposed Gayton Solar Farm and the proposed distribution centre at Tiffield as well as DHL on the Towcester A5/A43 Roundabout along with the Shortlisted 1g Site 228 and long listed 229 & 230 we question how this is compatible with the Ministry of Housing, Communities & Local Government National Planning Policy Framework 2021 Chapter 13 Protecting Greenbelt Land?

The map above demonstrates:

- unrestricted sprawl of large built-up areas
- neighbouring towns and villages merging into each other
- countryside encroachment

the need to retain greenbelt to offset the carbon footprint generated by these developments become more important and if left unchecked small villages will be consumed into urban Northampton or even worse, annexed within industrial estates. These small villages will risk losing all individual characteristics and heritage.

4) Favourable development for Rothersthorpe Parish

Rothersthorpe Parish Council is not opposed to development in principle within the confines of the parish boundary and we understand that certain development can be a positive driver for growth and local economy that will benefit Rothersthorpe however, development in all cases should be in proportion to the WNC's housing stock requirement, business/industry need and be sensitive to the rural character of village. All development should enhance and protect the heritage and historic archaeological assets Rothersthorpe has to offer.

For residential development larger than in-fill sites, Rothersthorpe Parish Council would look more favourably on developers who would be contributing to the improvement of village wide infrastructure so that it may safely support the growth in population.

Developers would need to show a minimal or negligible impact to existing conservation areas, areas of archaeological importance or guarantee to plans that enhance existing conservation areas, biodiversity initiatives, carbon off setting initiatives and increasing the number of trees within the Parish.

Rothersthorpe Parish Council would look more favourably on any residential developments that retains a green belt buffer between the village and the M1, positioned in strategic locations that would retain a village hub with a defined buffered boundary, ideally investigating land that lies to the west and North West of our current dwellings to help mitigate developing on areas of archaeological & historic importance.

Developers should be acknowledging the style and construction of dwellings within the old part of the village and calling out these features within any new build site so Rothersthorpe may retain its heritage characteristics.

As a 100% domicile village with circa 250 residents, a school, village hall, nursery and church, Rothersthorpe offers no other public amenities, services or retail opportunities. A popular pub was sold by the brewery to the open market approximately 10 years ago and was lost to residential development.

Any industrial, commercial or retail development should be in proportion to the size of the village and be sensitive to the rural character and should offer value added investment for a new local economy and benefit to the residents of Rothersthorpe and surrounding villages.

All development would require investment to overhaul and improve the current village sewerage network and pumping station to ensure it is fit for future generations.

5) Appropriate vision for guiding development and growth in West Northants

In answer to the WNSP Question 1: **Is this vision appropriate for guiding development and growth in West Northamptonshire up to 2050**; Rothersthorpe Parish Council agree that a robust strategic plan is required to assist in identifying areas of development to support the natural growth of the local population, as well as encouraging businesses and industry to enhance the local economy, ensuring West Northamptonshire is fit for purpose for future generations.

We feel this vision lacks detail or acknowledges how additional or improved services will have to be provisioned to support the increase in growth?

A "vision for growth" should primarily centre around identifying and ring-fencing development for "Local Services" defined as:

- Schools, education (namely combined primary & secondary establishments, secondary education, & further education settings)
- Hospitals Health and Primary care settings
- Public services (Police, Fire, Ambulance)
- Local community centres with local amenities and local leisure facilities.
- Improved access infrastructure

Without a defined plan that supports development that includes "local services", there is a fear that developers will be given free rein to maximise on SQ/FT builds that bring NO benefit to the local economy/populous surrounding the development sites.

Without ring fencing "local services" developments this will continue to put a strain on existing infrastructure that does not form part of the consultation.

6) Corporate Plan Priority – Green & Clean

In answer to the WNSP Question 2: **Are the "Green and Clean" Spatial objectives 1-4 appropriate for guiding development and growth in West Northamptonshire**; Rothersthorpe Parish Council agree that the "Green and Clean" spatial objectives do not go far enough and does not seem to be taken seriously in the wording of this section of the consultation.

Growth and development will inevitably lead to a loss in green belt/agricultural land where brown field sites cannot be developed.

Rothersthorpe Parish Council feel there is nothing in the consultation that clearly safeguards the extent of development for each shortlisted site, especially commercial / industrial / Logistic sites and

how developers will have to mitigate the loss of existing arable land, hedgerows, habitats that will be lost due to development.

The vision shows no incentives or desire by WNC that demand all commercial / industrial / logistics sites be built with roof solar and renewable sources to help carbon offset. Failure to do so would open up further opportunities for annex solar developments to exploit yet more greenbelt land.

The “vision” also fails to identify locations around the shortlisted sites that would be ring-fenced to "Increase more Trees" and provide "Accessible Green Space for all".

Development bunding, visual disguising trees and balancing ponds around the edges of an industrial, commercial and logistics development may not be enough to mitigate the greenbelt land loss, especially where developments are being proposed on the parish boundaries of historic villages.

Electric charging for EV is not an inclusive option and should not be called out over improving and developing infrastructure that offers multi modal options, Public transport, increased rail links, and a best in class linked cycling and walking infrastructure.

West Northamptonshire Council has the opportunity to throw the book out and totally redesign its approach to “green and clean” for all future developments, irrelevant of them being part of the strategic consultation or not. Local planning policy should set out a gold standard to ensure West Northamptonshire is a national leader in “Green & Clean” initiatives and have the power to call out developers that do not offer a value-added approach to Green & Clean.

7) Corporate Plan Priority – Connected Communities

In answer to the WNSP Question 4: **Are the “Connected Communities” spatial objectives 8&9 appropriate for guiding development and growth for West Northamptonshire;** Rothersthorpe Parish Council agree that this vision is fair in principle but does fall short in guaranteeing “Multi Modal” infrastructure development. Once again, we point out that electric charging for EV is not inclusive and should not be called out as a priority over improving and developing infrastructure that grows “Multi Modal” options.

Integrated cycling and walking infrastructure does not even form part of the overall “Connected Communities” objectives which is unacceptable, especially in a small domicile village like Rothersthorpe that offers NO convenient safe traffic free alternates connecting the village with the town.

8) Corporate Plan Priority – Thriving Villages & Towns

In answer to the WNSP Question 5: **Are the “Thriving Villages & Towns” spatial objectives 10 to 12 appropriate for guiding development and growth for West Northamptonshire;** Rothersthorpe Parish Council agree that this vision is once again fair in principle however the objective 12 statement within “Supporting Rural Communities” gives no indication to how this vision would be achieved?

Rothersthorpe Parish Council feel the statement “To protect and to support rural communities to ensure they thrive and remain vital” is in contrary to proposed shortlisted spatial option **1g site 228 South M1 Junction 15a – Employment**

We are concerned about the validity of this statement and what this actually means in real terms? We draw your attention back to section 1 of this document to re-highlight our parishioners concerns and question WNC as to how Rothersthorpe would be “supported”?

We are a small 100% domicile village with circa 250 residents, a school, village hall, nursery and church, Rothersthorpe offers no other public amenities, services or retail opportunities. With strategic development, with both short and long listed sites in mind, how will we be supported? With proposed shortlisted spatial option **1g site 228 South M1 Junction 15a – Employment** Equivalent to the scale of the current Panattoni Park development on M1 Junct 16 thus in effect reducing our parish boundary and segregating the village further how will we be supported?

Unlike residential development, industrial, commercial and warehousing development does not form part of the parish rate council tax, yet any development within the parish boundary may fall under the parish remit of guardianship or will land be lost from the historic parish boundary? How will we be supported?

We urge WNC to clarify this statement and build guaranteed “aims” into the vision, and to ensure these aims are robustly governed at any planning application phase.

9) Corporate Plan Priority – Economic Development

In answer to the WNSP Question 6: **Are the “Economic Development” spatial objectives 13 to 16 appropriate for guiding development and growth for West Northamptonshire**; Rothersthorpe Parish Council agree that that the vision is suitable in principle however wish to call out concerns on objectives 15 and 16.

Objective 15: Rural Diversification and Employment

Rothersthorpe Parish Council wish to call out the potential impacts to local farmers and tenant farmers who will lose their land to strategic development and how this will be mitigated as we are a great county where local farmers grow local produce for local business and industry, this is something that needs safeguarding at all costs as to keep the carbon footprint within agriculture lower than having to import arable and livestock produce.

Prime arable growing land should wherever possible be deprioritised from development shortlists. In the case of proposed shortlisted spatial option **1g site 228 South M1 Junction 15a – Employment** this is good quality arable land that has rotated crops each year and generates a good yield.

Objective 16: The Visitor Economy

Rothersthorpe Parish council wish to highlight the impacts of disrupting natural areas that draw in visitors by building strategic developments within its boundary. As stated in section 2 of this document, the proposed shortlisted spatial option **1g site 228 South M1 Junction 15a – Employment** highlights areas such as listed monuments, areas of archaeological interest and the Northampton Arm for the Grand Union Canal Conservation and Buffer zone that all attract visitors.

WNC should be championing the preservation of these landscapes which would build a richer visitor portfolio especially whilst pursuing a City Status.

Safeguarding and enhancing these sites would potentially generate new untapped income within the local economy.

Rothersthorpe parish Council would like to take this opportunity in thanking West Northamptonshire Council in advance for its consideration and hopes this document provides the strategic consultation team with local insight.

We look forward to the next phase in the consultation and would appreciate any feedback or comments regarding both shortlist and longlist sites around the Rothersthorpe Parish.

We wish to work closely with WNC in all aspects of future development to ensure positive benefits for the people, environment and economy of Rothersthorpe.

Yours Faithfully.

Frankie Gilkes

Chair of Rothersthorpe Parish Council

For and on behalf of all elected councillors of the Parish of Rothersthorpe