



Boughton Parish Council Representations

**West Northamptonshire Local Plan 2043
Regulation 18 Consultation
(29th January – 27th March 2026)**

March 2026

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These Representations are prepared and submitted on behalf of Boughton Parish Council (BPC)

Executive Summary

Boughton Parish Council objects to the draft West Northamptonshire Local Plan insofar as it affects Boughton Parish, including Policy N20 (Land North of Buckton Fields), the wider Northampton fringe strategy and the proposed parish housing requirement for Boughton.

The Parish Council's core concern is that the Plan does not yet demonstrate, through a sufficiently robust, transparent and internally consistent evidence base, that this is an appropriate location, scale or form of growth. The Plan blurs an important distinction between modest village-scale growth at Boughton and major Northampton-edge expansion within Boughton Parish, without clearly addressing the strategic consequences of that approach.

The Sustainability Appraisal, site selection material and wider evidence base do not provide a sufficiently clear or convincing justification for N20. The proposed allocation is a reconfigured composite site, yet the consultation material does not clearly explain how the final boundary was derived, how that final configuration was assessed, or why this location was selected when other Northampton fringe sites appear to have been ruled out on grounds such as coalescence, separation, landscape or heritage impact. These concerns are reinforced by the Council's own acknowledgement that further technical work on transport, water, heritage and viability is still required before Regulation 19.

The Plan also applies two different growth logics to Boughton Parish at the same time. Boughton is treated as a Secondary Service Village and assigned a parish housing requirement of 42 dwellings, while the parish is also expected to absorb 1,500 dwellings of Northampton growth through Policy N20. The Plan should distinguish clearly between those two propositions and explain why Boughton village should be expected to accommodate further parish-level growth when the parish is already being used to accommodate major Northampton-edge expansion.

The environmental, landscape and heritage concerns are substantial. The Council's own evidence identifies this area as sensitive in terms of landscape character, settlement separation, heritage setting, biodiversity, green infrastructure and flood-related constraints. The Plan does not yet demonstrate that the scale and form of development proposed can be accommodated without unacceptable harm to Boughton's distinct identity, its parkland-influenced setting, the wider separation from Northampton, or the significance of nearby heritage assets.

The infrastructure and delivery case is also incomplete. There is no convincing evidence at this stage that N20 can function as a genuinely sustainable location, or that the necessary transport, utilities, drainage, green infrastructure and other mitigation can be delivered in a timely and viable way. The published housing trajectory is not a real trajectory for a strategic site of this scale, but an arbitrary placeholder pending further work.

Overall, Boughton Parish Council considers that Policy N20 and the wider strategy affecting Boughton Parish are not justified in their current form. The Council should reconsider the allocation, the parish housing requirement and the wider Northampton fringe strategy before Regulation 19, supported by a clearer appraisal of alternatives, stronger

environmental and design evidence, a more transparent spatial strategy and a realistic delivery and infrastructure delivery plan.

If, notwithstanding these objections, land north of Buckton Fields were ever to be considered further through the Local Plan process, it should not be advanced as a routine urban extension to Northampton or as an “extension of an extension”. Any such proposal would require a materially different strategic conception and justification, taking the form of a distinct, nucleated and landscape-led settlement planned to respect the separate identity, setting and heritage of Boughton.

1. Introduction

- 1.1. West Northamptonshire Council (WNC) is consulting on its Regulation 18 Local Plan which will replace the West Northamptonshire Joint Core Strategy Local Plan (Part 1) and Part 2 Local Plans for the former local authority areas (Daventry, Northampton and South Northamptonshire). The consultation is from 29th January 2026 – 27th March 2026.
- 1.2. BPC welcomes the opportunity to comment on the Regulation 18 consultation for the West Northamptonshire Local Plan. The Parish Council has reviewed the Local Plan and supporting evidence base and has identified a number of key areas where the proposed allocation affecting Boughton Parish raises concerns and questions regarding the consistency of the plan's spatial strategy, evidence and site selection approach. These representations set out BPC's initial observations on these matters.
- 1.3. These representations also build upon Boughton Parish Council's earlier submissions to WNC concerning Northampton's urban area and the distinct status and character of Boughton village.
- 1.4. The Parish Council would welcome the opportunity to meet with WNC officers to discuss these representations and to explore whether the issues identified can be addressed as the Local Plan progresses towards the next stage of Local Plan preparation.
- 1.5. The structure of these representations addresses the proposed allocation affecting Boughton Parish, the scale of growth proposed for Boughton, the plan's spatial strategy and site selection approach and the associated environmental, landscape, design, infrastructure, deliverability and viability considerations.
- 1.6. The representations respond to the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA). Strategic cross-boundary matters, including the Duty to Cooperate are also addressed.

Evidence Base Deficiencies

- 1.7. A central concern with the Local Plan is that the proposed allocation at North of Buckton Fields is being consulted on before the supporting evidence base is sufficiently complete, up to date or transparent. This is not a narrow procedural point. For a strategic greenfield allocation of 1,500 dwellings in a sensitive location, the adequacy of the evidence base goes directly to whether the site is justified, effective and capable of being delivered sustainably.
- 1.8. In particular, key strands of evidence appear to be absent, incomplete, outdated or deferred to later stages. These include:
 - **Infrastructure planning:** no up-to-date and allocation-specific Infrastructure Delivery Plan (IDP) demonstrating what infrastructure is required to support N20, the estimated cost of the infrastructure, when it would be needed, how it would be funded, who would deliver it and how it aligns with the housing trajectory and delivery assumptions.

- **Flood risk and water management:** the Plan refers to an Integrated Water Management Study incorporating a replacement SFRA however it is not clear where that updated evidence has been published or how it has informed the current allocation choices. The currently available SFRA material is materially dated and was not prepared against the current site context.
- **Heritage and archaeology:** the Plan's own material acknowledges the presence of Boughton Bowl Barrow within the site and the proximity of Boughton Hall Registered Park and Garden, while the SA identifies adverse heritage effects. Yet the Plan is not clearly supported by a robust, allocation-specific Heritage Impact Assessment demonstrating how the significance and setting of these assets have informed the principle, extent and configuration of the allocation.
- **Transport and accessibility:** there is no clear evidence demonstrating that this physically separate northern-edge site can provide genuinely sustainable access to Northampton town centre and other higher-order services without substantial reliance on the private car.
- **Viability:** the viability evidence is fundamental to understanding whether the infrastructure, mitigation and policy burdens attached to N20 are realistic and deliverable, yet the evidence does not assess this.
- **Housing delivery:** the published trajectory simply places N20's 1,500 dwellings into a single arbitrary year, rather than providing a genuine year-by-year assessment of lead-in times, phasing, build-out rates and infrastructure dependencies.
- **Site selection and appraisal:** the Site Selection Background Paper itself confirms that further refinement before Regulation 19 will depend on the outcomes of ongoing technical work, including integrated water management, heritage, transport and viability. That materially weakens confidence in the robustness of the current Regulation 18 allocation choices.

1.9. Taken together, these are serious deficiencies. The issue is not simply that individual technical documents could be improved. The issue is that Policy N20 is being advanced in the absence of an up-to-date and allocation-specific evidence base across infrastructure, flood risk, heritage, archaeology, viability, delivery and sustainable access. For a strategic allocation of this scale in a sensitive and relatively isolated location, that is not a minor omission. It goes directly to whether the site is justified, effective and capable of being delivered sustainably.

2. Proposed Allocation – Policy N20: Land North of Buckton Fields

- 2.1. Policy N20 proposes an allocation of approximately 1,500 dwellings together with supporting infrastructure including a local centre, community facilities, green infrastructure and associated transport improvements at Land North of Buckton Fields. The proposed allocation forms part of WNC’s emerging strategy for growth on the northern edge of Northampton.
- 2.2. The policy’s supporting text states that the site is intended to build upon the recently approved (and delivered) Northampton North Sustainable Urban Extension (SUE) at Buckton Fields and consolidate the emerging northern edge of Northampton.
- 2.3. The Policy states that development should be guided by a comprehensive masterplan and provide a sustainable neighbourhood with strong connections to surrounding areas through walking, cycling and public transport.
- 2.4. In terms of the key considerations that will need to inform the development of the site, the policy states:
 - Relationship with nearby heritage assets (including the Scheduled Monument at Boughton Bowl Barrow and the Grade II* Registered Park and Garden at Boughton Hall)
 - Landscape sensitivity
 - Ecological constraints associated with the Nene Valley Nature Improvement Area
 - Potential ground conditions relating to the former quarry
 - Provision of infrastructure including sustainable transport, green corridors and drainage infrastructure
- 2.5. The following sections consider the proposed allocation and its supporting evidence base to assess whether the strategy and proposed growth at Boughton Parish is justified.

3. Boughton Village and Parish – Settlement Context

- 3.1. Boughton is an historic Northamptonshire estate village with evidence of prehistoric, Roman and Anglo-Saxon activity. This includes Bronze Age burial monuments, Iron Age settlement features and Roman artefacts identified around Boughton Green and the surrounding landscape. The village itself is recorded in the Domesday Book as a relatively substantial settlement and during the medieval period an early focus of activities around Boughton Green and Old St John’s Church. Over time the settlement consolidated closer to Boughton Park and its present-day village core, developing a compact, nucleated estate village closely associated with Boughton House and surrounding historic parkland landscape.
- 3.2. The historic core of Boughton is designated as the Boughton Conservation Area (CA) which reflects the architectural and historic value and interest of the village and its relationship with Boughton Park and wider estate landscape. Unlike many village conservation areas with focus primarily on a small historic area, the CA is extensive in its coverage extending beyond the village centre to include the surrounding parkland and historic landscape which contribute to the character and significance of the settlement.
- 3.3. The parish includes a number of heritage assets. This includes a number of listed buildings in the village most notably the Grade I listed Church of St John the Baptist and a range of Grade II listed buildings reflecting the historic development of the estate village. There are two Scheduled Ancient Monuments including the Bronze Age Boughton Bowl Barrow and the remains of the Old St John’s Church. This illustrates the historical development of the area and the **archaeological sensitivity** of the wider landscape.
- 3.4. Today Boughton remains a relatively small rural parish with a clearly defined settlement form surrounded by open countryside and estate landscape. Whilst it is in relatively close proximity to Northampton’s growth the village has remained physically and visually distinct from the urban area.
- 3.5. The parish is defined by a distinctive environmental and landscape setting. The area contains a network of watercourses associated with the River Nene, with significant areas of floodplain located to the west of the parish and around Pitsford and Brampton. These watercourses form an important natural landscape structure and potentially contribute to development constraints.
- 3.6. The surrounding landscape includes areas of woodland, spinneys and parkland features associated with the historic landscape of Boughton Park which together contribute to the environmental character and biodiversity value of the area. These features form an important part of the landscape of Boughton and influence the way in which the settlement relates to the surrounding countryside. Together with the historic parkland landscape and heritage assets they contribute to the distinct rural character and village identity within the wider Northampton landscape.

- 3.7. In recent years the southwestern part of the parish has experienced growth through the delivery of the Buckton Fields urban extension providing approximately 1,000 dwellings to meet the needs of Northampton. The wider corridor south of Boughton is also influenced by strategic infrastructure and land uses, including the A508 (Market Harborough Road) transport corridor and the former Boughton Quarry to the west of the A508. This context is important when considering the scale, location and potential impacts of further strategic growth proposals in the area.
- 3.8. **Policy R6 (Rural areas housing requirements)** states that housing sites will be identified to provide for the parish housing requirements, explaining that suitable sites within or immediately adjoining the confines of the villages referenced in the policy, will be identified through neighbourhood development plans or through a development plan document. The housing figure proposed for Boughton is **42 dwellings**. The supporting text for the policy explains that the settlement hierarchy (Policies R1-R4) builds on the commitment of Policy S1 to identify needs for housing in Primary and Secondary Service Villages. This draft Policy R6 for 42 dwellings in Boughton is addressed through our representations below.

4. Sustainability Appraisal, Reasonable Alternatives and Site Selection Methodology

This section relates primarily to the Sustainability Appraisal (January 2026), the Site Selection Background Paper (January 2026), the Settlement Hierarchy Background Paper and associated site assessment appendices.

Sustainability Appraisal

- 4.1. The NPPF states that *“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements¹⁸. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”¹.*
- 4.2. We raise concerns regarding whether the Sustainability Appraisal (“SA”), the consideration of reasonable alternatives and the site selection methodology² together provide a sufficiently robust, transparent and internally consistent basis for the proposed allocation of Land North of Buckton Fields (Policy N20) and for the wider distribution of growth affecting Boughton Parish and the Northampton fringe.
- 4.3. The SA is a critical part of the plan-making process, to identify, describe and evaluate the likely significant effects of the Local Plan and its reasonable alternatives and to provide a clear explanation of why alternatives have been selected or rejected. The Council’s own SA report confirms that this is its purpose.
- 4.4. However, when the SA material, site selection background paper and associated appendices are read together, the evidence has significant gaps in a number of important respects, particularly for the Northampton fringe and Policy N20.
- 4.5. The January 2026 SA explains that site options were assessed through a combination of spatial site assessment, a high-level assessment and for shortlisted allocations with more uncertain or adverse effects, a detailed assessment matrix. It also explains that the detailed assessments were used to scrutinise negative or uncertain effects in more detail and recommend mitigation.
- 4.6. It states that many of the detailed assessment matrices are based on medium or low confidence, reflecting lack of data and the fact that conclusions are often informed appraisals rather than firm decisions. It also says that where medium or low confidence

¹ NPPF (2024) Paragraph 33

² Site Selection Background Paper (January 2026)

arises due to lack of data, those gaps are subject to ongoing review and will be filled “as far as possible” at Regulation 19 stage.

- 4.7. The SA further acknowledges that the high-level site assessments were **not informed by the May 2025 landscape sensitivity study**, because that work was only published later. Instead, landscape sensitivity informed the later detailed assessment stage and the overall assessment of the Local Plan. This is important for Boughton and the Northampton fringe, because landscape setting and strategic separation are central to the planning issues here.
- 4.8. The SA also states that the performance of the plan in sustainability terms will depend heavily on implementation, including the eventual provision of water and energy efficiency measures, viability, infrastructure requirements and affordable housing. That is relevant because the Local Plan is consulting on allocations before several important strands of technical work are complete.

Broad spatial strategy options and reasonable alternatives

4.9. The SA identifies eight broad spatial options, including:

- Option 1 Northampton Focus
- Option 2 Northampton Fringes with Northern Relief Road,
- Option 3 Urban Regeneration,
- Option 4 Larger Towns and Primary Service Villages,
- Option 7 Larger Towns, Primary and Secondary Service Villages, and others.

4.10. The SA states that the regeneration-focused options, particularly Options 1 and 3, perform most favourably in sustainability terms and that the Council then concluded that some additional peripheral growth was required, focused on Northampton.

4.11. That is a high-level explanation, but it still does not provide a transparent story for the Boughton / Northampton fringe area. The SA says that the component sites used within the broad spatial options were selected as **proxies**, rather than representing final allocations. That is an important caveat, because it means the broad options testing is not the same thing as a clear comparative assessment of the final allocation choices.

4.12. The difficulty is that the consultation material does not clearly publish the underlying distributional assumptions for the spatial options in a way that allows proper scrutiny of:

- how much growth was assumed on the Northampton fringe under each option;
- how much growth (if any) was assumed around Boughton; and
- how alternatives affecting village setting, strategic separation and the northern edge of Northampton were comparatively tested.

4.13. In that respect, the SA remains insufficiently transparent. It describes the options and gives broad scoring summaries, but it does not provide a clear enough distributional details for those parts of West Northamptonshire most relevant to these representations.

Rural dispersal / settlement hierarchy issues

4.14. The SA also addresses rural strategy options and states that “other villages” were not treated as reasonable alternatives because, in the Council’s view, this would not align with the Local Plan’s objectives of promoting sustainable travel and reducing the need to travel. It then tests three rural options focused on primary villages and varying degrees of inclusion of secondary villages.

4.15. This is relevant because Boughton is a **Secondary Service Village** and the consultation material does not clearly explain how the settlement hierarchy evidence and the SA evidence have been combined in selecting the preferred growth pattern affecting Boughton and the Northampton fringe. In particular, it is not clear how the Council moved from the broad spatial options and rural dispersal options to the conclusion that major growth North of Buckton Fields is preferable to other patterns of growth or other Northampton fringe alternatives.

4.16. This is important because accessibility to services, public transport and settlement role are all meant to be central to the hierarchy and SA framework. However, the route from that evidence to the final proposed allocations is not clear in the evidence.

Individual site alternatives and the appraisal of N20

4.17. The January 2026 SA confirms in the detailed assessment matrix that Site 372, North of Buckton Fields, Northampton is being treated as “Policy N6xxi / N20 is a slimmed version of this site together with site 68.” This is significant. It confirms that Policy N20 is not simply a direct carry-through of one original SLAA site in the same form. It is a reconfigured composite derived from Site 372 together with Site 68.

4.18. The issue is that this is not presented with sufficient transparency in the SA. If the final proposed allocation is a reconfigured site, then the SA should demonstrate clearly and consistently:

- what the original sites were;
- how the final policy boundary was derived;
- what land was removed or retained; and
- how the likely significant effects of the final allocation, as proposed, have been assessed on a like-for-like basis against alternatives.

4.19. Without that, the evidence is weakened and it becomes difficult to confirm that the final proposed allocation has been appraised as a coherent whole, rather than by reference to underlying site references that do not exactly match the allocation as now proposed.

4.20. This concern is reinforced by the consultation analysis appended to the SA, whereby consultees explicitly challenged the treatment of Site 372 and the basis on which the North of Buckton Fields land was analysed. The Council's response was essentially to point back to Chapters 4 and 5 and to say that Site 372 had been subject to high-level assessment. This response does not resolve the issue.

Key constraints identified by the SA for the Northampton Fringe / Boughton area

4.21. The SA identifies a substantial set of constraints and sensitivities affecting this area. At high level, Site 372 scores:

- positive for housing provision,
- negative or uncertain in relation to accessibility and social inclusion,
- negative in relation to biodiversity,
- negative in relation to landscape,
- negative in relation to heritage,
- negative in relation to land use and soils,
- negative in relation to mineral safeguarding,
- negative / mixed in relation to flood risk,
- mixed in relation to transport and climate.

4.22. The detailed assessment goes further. For Site 372 it identifies:

- potential loss of potential wildlife sites within the site boundary and nearby Local Wildlife Sites;
- minor adverse landscape effects;
- heritage sensitivities including Boughton Hall Registered Park and Garden and Boughton Bowl Barrow;
- loss of best and most versatile agricultural land;
- partial presence of Flood Zone 2 and Flood Zone 3; and
- mixed effects in relation to accessibility / car use due to the urban fringe location.

4.23. The wider high-level assessment material for nearby Boughton / Moulton / Northampton-edge alternatives also shows a consistent pattern of sensitivities in this area, including:

- Upper Nene Valley Gravel Pits SPA / Ramsar proximity;
- local wildlife sites and potential wildlife sites;
- landscape character sensitivity in the Moulton Slopes area;
- heritage sensitivities including Boughton Hall Registered Park and Garden; and
- Boughton Conservation Area and Old St John's Church Scheduled Monument, and in some cases flood risk.

4.24. This increases, rather than reduces, the need for a very clear comparative appraisal of alternatives and a very clear explanation of why this particular site configuration has been selected.

Site selection methodology

4.25. The Site Selection Background Paper (January 2026) is useful because it sets out the Council's staged methodology, but it also reveals that the process is not yet fully mature. It confirms that the Council's approach involved SLAA filtering, assessment of suitability / availability / achievability testing of broad spatial options and then a more detailed planning assessment of shortlisted sites. It also makes clear that further refinement is still required before Regulation 19, including in light of consultation responses and ongoing technical work such as water, heritage, transport and viability. That is a concern in itself, but there is also a consistency issue as explained below.

4.26. Appendix L to the SA records that **Site 372 North of Buckton Fields is ruled in (in part)** because the southern part is said to present a logical extension to Northampton and the Whitehills SUE, albeit with impacts on historical and natural environmental assets, landscape sensitivity and the loss of best and most versatile agricultural land.

4.27. By contrast, other Northampton fringe alternatives are ruled out expressly because they would cause coalescence, conflict with separation or green wedge objectives, or because of landscape and heritage sensitivities. The site selection forms include examples where sites were rejected because they had moderate to high landscape sensitivity, lay within a special landscape area or would cause coalescence between Northampton and nearby villages.

4.28. That comparative material is important. It shows that separation, coalescence and fringe sensitivity have been treated elsewhere in the methodology as decisive considerations. Yet in the case of Boughton / North of Buckton Fields where strategic separation, landscape setting and historic environment sensitivities are also significant, the site is ruled in.

4.29. That may be the Council's planning judgement however the methodology should explain much more clearly **why those concerns were decisive elsewhere on the Northampton edge, but not for Boughton / North of Buckton Fields.**

Conclusion

4.30. Overall, BPC does not consider that the SA, the treatment of reasonable alternatives and the site selection methodology provide a clear, transparent and robust basis for Policy N20. In particular:

- the broad spatial options do not provide a sufficiently transparent audit trail for the Northampton fringe and Boughton area;
- the route from the settlement hierarchy / rural strategy evidence to the preferred distribution of growth is not clearly explained;
- the final allocation is a reconfigured composite derived from Site 372 together with Site 68, but that is not presented in a sufficiently clear and consistent way in the appraisal;
- the SA itself identifies significant environmental, landscape, heritage, accessibility and flood-related sensitivities affecting this area; and
- the comparative reasoning for ruling in this site, when other Northampton fringe sites were ruled out on separation, coalescence, landscape or heritage grounds, is not adequately explained.

4.31. These concerns are reinforced by the Council's own acknowledgement that further technical work and refinement are still required before the Regulation 19 Local Plan. In those circumstances, we do not consider that the current evidence demonstrates a robust or transparent basis for the proposed allocation at North of Buckton Fields.

5. Spatial Strategy, Housing Distribution and Settlement Hierarchy

This section relates primarily to Policies S1, N1, N6, N20, R2, R6 and HO1 and draws on the Site Selection Background Paper, Settlement Hierarchy Background Paper, Green Wedge Assessment and Urban Fringe evidence.

- 5.1. National policy requires plans to promote a sustainable pattern of growth³. The Plan does not yet explain clearly enough why this Northampton-edge location is preferable to other alternatives or why Boughton should be treated through two different growth logics at once.
- 5.2. The Local Plan's spatial strategy is framed around directing growth to the most sustainable locations, with a stated priority on regeneration and the use of previously developed land, alongside peripheral growth at Northampton. Policy S1 Spatial strategy (distribution of development) states in clause F that *"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"*. As we set out in our representations this approach has not been taken in respect of the proposed allocation N20 (North of Buckton Fields).
- 5.3. The Site Selection Background Paper (January 2026) confirms that the Council is planning for 45,054 dwellings over the period 2025–2043⁴, rising to 47,307 dwellings with the addition of a 5% buffer and leaves approximately 15,301 dwellings to be identified through the new Local Plan based on a supply of 32,006 dwellings at 1 April 2025.
- 5.4. This is relevant as the justification for the proposed allocation at North of Buckton Fields depends on whether the Plan has in fact followed a coherent and transparent approach to regeneration, peripheral Northampton growth, rural distribution and the treatment of villages such as Boughton.

Spatial strategy and role of Northampton

- 5.5. The Plan's strategy is explicit that development will be concentrated primarily in the Principal Urban Area of Northampton through regeneration of previously developed land and vacant or underutilised buildings, or as peripheral growth. The Northampton chapter then identifies a substantial package of regeneration and peripheral housing opportunities, including the major greenfield allocations at East of Wooldale Road (1,700), North of Newport Pagnell Road (1,000), West of A43 (2,900), East of A43

³ NPPF (2024) Paragraph 11(a)

⁴ See Policy HO1 – Housing requirement

(1,950), Collingtree Golf Course (300), North of Buckton Fields (1,500) and South of Grange Park (850).

5.6. The strategy is often described in ‘regeneration-led’ terms however a very substantial proportion of Northampton’s planned supply is in fact being delivered through major greenfield peripheral growth rather than regeneration alone. The Plan should therefore be much clearer and more candid about the extent to which the Northampton strategy relies on urban-edge expansion and why this is considered preferable to other alternatives.

Residual housing figure

5.7. There is also a basic audit-trail issue in the evidence base. The Site Selection Background Paper states that, with a need of 47,307 dwellings and a supply of 32,006 dwellings, approximately 15,301 dwellings remain to be identified.

5.8. However, other parts of the background material refer to a higher “residual” figure. That discrepancy matters because it affects the scale of additional allocations that are then presented as necessary. The evidence base should reconcile these figures clearly and transparently so that the public can follow the route from housing requirement, to supply, to residual need and then to site selection.

Settlement hierarchy methodology

5.9. The settlement hierarchy is meant to play an important role in the rural strategy. The Settlement Hierarchy Background Paper (January 2026) explains that a settlement hierarchy is a means of categorising settlements by their sustainability, having regard to the range of services and facilities they provide and access to public transport and infrastructure, in order to help direct development to the most sustainable locations. It also explains that the Council chose a methodology based on the former Daventry approach because it provided a more solid basis, including minimum parameters for services, facilities and bus provision before any qualitative review.

5.10. Against that methodology, Boughton does not appear to meet the Council’s own quantitative threshold for classification as a Secondary Service Village. The Background Paper states that a settlement must score at least **47** to be initially classified in that tier. However, in Appendix 1 Boughton is shown as scoring **46**, with only **6 services and facilities** and is listed among those settlements that “have not scored the minimum requirements to be a Secondary Service Village (47)”.

5.11. The Settlement Hierarchy Background Paper nevertheless retains Boughton in the Secondary Service Village tier for different reasons, namely that Boughton Parish has a larger population because it includes Buckton Fields, that the data cannot be disaggregated below parish level and that the village has a primary school which the Council considers should be supported through allowing growth. That may be a separate planning judgment capable of being advanced on its own terms. However, it is not the same as demonstrating that Boughton itself performs the role, function and

sustainability characteristics of a Secondary Service Village under the Council's stated methodology.

5.12. The Plan should therefore distinguish much more clearly between, on the one hand, settlements that satisfy the hierarchy evidence and, on the other, settlements that are being retained in a higher tier for broader qualitative or policy reasons. As drafted, the evidence base risks conflating those two separate propositions.

Rural distribution and settlement hierarchy

5.13. The Plan should make clear that it is advancing two separate propositions at the same time:

- Boughton is a rural settlement subject to a modest parish-level housing requirement; and
- Northampton's housing needs should partly be met through major peripheral expansion adjoining Boughton Parish.

5.14. The hierarchy and the rural distribution appear to operate separately rather than in an integrated way. If Boughton is being retained in the Secondary Service Village tier partly on the basis that some growth is needed to support local services, the Plan should explain much more clearly how a parish-level figure of 42 dwellings is expected to achieve that objective in practice and how that sits alongside the much larger Northampton-edge allocation in the same parish.

Strategic separation

5.15. The split treatment of Boughton within the Plan makes it essential that the spatial strategy addresses directly how further Northampton-edge growth, following the major expansion already accepted at Buckton Fields, would safeguard the remaining separation, setting and rural character associated with historic Boughton. If Boughton Parish is to accommodate both major Northampton-related growth and additional village-scale growth, the Plan must explain clearly how the distinction between Northampton and Boughton is to be maintained.

5.16. The Site Selection Background Paper states that Land North of Buckton Fields would extend Northampton northwards but would not compromise the physical separation between the town and surrounding villages, on the basis that it would be separated from Boughton by the A508. It also describes the site as a natural extension to Northampton and the Northampton North Whitehills SUE. However, the Council's wider evidence base shows that separation and coalescence are treated elsewhere as important strategic considerations in assessing Northampton fringe growth. The Green Wedge Assessment (April 2025) is expressly concerned with protecting the identity,

character and setting of fringe settlements by maintaining physical and visual separation and preventing coalescence. Likewise, elsewhere in the site selection material, Northampton fringe sites have been discounted where development would erode separation or increase the risk of coalescence with adjoining villages.

- 5.17. That same logic is not clearly followed through on the Boughton / Buckton Fields edge. The fact that Buckton Fields has already been accepted as Northampton-related growth does not reduce the importance of the remaining open land in safeguarding the separate identity and setting of historic Boughton. On the contrary, where substantial edge-of-settlement growth has already occurred, the residual open land becomes more important, not less, in maintaining a distinction between town and village. The methodology therefore treats separation and coalescence as significant issues in some locations, but the Plan does not explain with sufficient clarity why the Boughton / Buckton Fields edge is said not to raise those same strategic concerns despite the scale of N20 and the obvious functional integration pressures that it would create.
- 5.18. This point is reinforced by the Council's own urban fringe evidence, which recognises that Boughton and Moulton are among the settlements most susceptible to coalescence with Northampton and that further development should be resisted where open fields, hedgerow boundaries and wooded areas contribute to physical separation and settlement setting. The Study⁵ states:
- "There is relatively little gap between the northern edge of Northampton and the villages of Boughton, Moulton and Overstone. There has already been some coalescence along roads, so the open fields around the villages perform an important function in providing a physical and/or visual separation between Northampton and its surrounding villages."*
- 5.19. The Plan does not clearly explain why Northampton-edge growth north of Buckton Fields is said not to raise the same strategic separation concerns. The presence of the A508 may be relevant, but it does not by itself answer the broader strategic question of whether the remaining open land continues to perform an important role in maintaining the distinct identity, setting and rural character of Boughton.
- 5.20. Whilst substantial Green Wedge land is identified around this part of Northampton, the land north of Buckton Fields appears as a notable gap within that broader pattern, notwithstanding its relationship to the remaining open setting of Boughton. That further underlines the need for a more explicit explanation of how the strategy has treated this area and why it is considered appropriate for allocation despite the wider emphasis placed elsewhere on preventing coalescence.
- 5.21. In Boughton's earlier submissions to WNC the Parish Council accepted Buckton Fields as Northampton-related development, but did not accept that Boughton village should be treated as part of Northampton or as part of a coherent network of urban built development. It emphasised that Boughton retains a distinct village character, is

⁵ Northampton Urban Fringe Landscape Character & Sensitivity Study (November 2018) para 2.1.49

visually read in relation to its surrounding countryside and should not lose that separate identity simply because major growth has taken place elsewhere in the parish. That earlier position remains directly relevant to the current strategy, which again risks conflating Northampton-edge expansion in Boughton Parish with growth at Boughton village itself.

Implications for the form of development

5.22. The highlighted separation and sensitivity issues for N20 remain unresolved and has implications for the form of development being proposed. If the land north of Buckton Fields cannot be treated as a seamless Northampton extension without further eroding the separate identity, the setting of Boughton and heritage assets then any development would take another form. This is recommended in the Council's own urban fringe evidence and illustration showing the area west of the A508 in Boughton parish taking the form of a 'necklace village' reflecting the historic settlement pattern of Northampton fringe villages, including Boughton village.

5.23. We would suggest that this take the form of a distinct, nucleated and landscape-led settlement – not a typical 'edge-of-town' extension that does not respond to its setting.

Urban capacity

5.24. The Plan needs more transparent urban capacity evidence. Whilst the Plan states a priority for regeneration and previously developed land, the Northampton housing supply shows that major greenfield peripheral sites make a very substantial contribution to the overall supply.

5.25. This increases the importance of understanding whether regeneration opportunities have been maximised and how peripheral greenfield release has been justified. If regeneration delivery is uncertain or slower than assumed, then peripheral allocations are more likely the default means of meeting the housing requirement. The Plan should therefore explain much more clearly how regeneration assumptions, existing commitments and new peripheral allocations interact over time

Conclusion

5.26. Overall, we do not consider that the current spatial strategy, housing distribution evidence and settlement hierarchy material provide a sufficiently clear and internally consistent basis for the level and form of growth proposed in Boughton Parish.

5.27. In particular:

- the strategy is described as regeneration-led, yet a substantial proportion of Northampton's planned supply is delivered through major greenfield peripheral allocations;
- the evidence base should reconcile clearly the different residual housing figures used in different documents;

- Boughton’s classification within the settlement hierarchy appears to rely on qualitative reasoning that is conceptually different from simply demonstrating that the village meets the stated sustainability thresholds;
- the evidence base blurs the distinction between modest rural parish-level growth at Boughton and major Northampton-edge expansion in Boughton Parish; and
- the Plan does not explain with sufficient clarity why strategic separation and coalescence concerns appear to justify ruling out some Northampton fringe sites, but not North of Buckton Fields.

5.28. The Plan should therefore set out a more transparent and coherent explanation of how the hierarchy, rural distribution, Northampton-edge growth strategy and site selection process fit together in relation to Boughton.

6. Infrastructure and Viability

This section relates primarily to Policies TR1-TR3 and IN1-IN2 and draws on the Infrastructure Delivery Plan, transport evidence, viability evidence and the National Highways Regulation 18 response.

- 6.1. A core issue with Policy N20 is that it is proposed without a clear or up-to-date infrastructure and viability evidence base. For a strategic allocation of 1,500 dwellings on a peripheral site beyond Buckton Fields, the Plan should demonstrate what infrastructure and mitigation are required. It should also clearly demonstrate when the infrastructure is needed, how it will be funded and whether it is realistic in viability and delivery terms. Currently it does not achieve this.
- 6.2. The location of N20 is not currently rich with infrastructure and nor is it an 'infrastructure ready' location. It is a relatively isolated northern-edge site that would require substantial intervention including safe and attractive active travel links, effective bus penetration and service quality, highway mitigation, utilities reinforcement, water and wastewater capacity, green infrastructure, drainage and responses to heritage, landscape and archaeological constraints. Those requirements are not minor matters to be addressed later. They go directly to whether the site is capable of functioning as a genuinely sustainable extension to Northampton.
- 6.3. Yet the current evidence base does not provide a coherent and allocation-specific evidence of those infrastructure requirements or clear site specific viability assessment. There is no clearly up-to-date Infrastructure Delivery Plan (IDP)⁶ showing the full package of infrastructure needed to support N20, no transparent trigger schedule aligned to housing phasing, no site-specific viability testing of the allocation and no realistic trajectory against which the timing of key interventions can be tested. In those circumstances, it is not possible to judge with confidence whether the site is deliverable as proposed.
- 6.4. We note **National Highways' (NH)** Regulation 18 response⁷ which reinforces our point that strategic transport and infrastructure implications of the proposed allocation unresolved at that stage of plan-making. NH referred to the need for a more robust, updated strategic modelling, assessment of cumulative impacts on the Strategic Road Network (SRN) and further work on the Phase 2 IDP to identify the infrastructure work needed to support the proposed allocations. NH also noted that there were no RIS3 schemes in the area and that the review of the Northampton Gateway Management Scheme was only at an early stage. These points, when taken together, indicate key transport impact, mitigation, infrastructure requirements, funding and delivery were

⁶ PHASE 1 Review (update) for: West Northamptonshire Preferred Options (Regulation 18) Consultation

⁷ National Highways Reg 18 response (CS0092)

clearly not yet resolved. This remains the case whereby any justification for a major allocation at N20 cannot rest on inadequate infrastructure evidence.

Northampton Northern Orbital Road / Relief Road

- 6.5. The Plan relies on major growth in the northern Northampton area, including the proposed allocation at Northampton, North of Buckton Fields (Policy N20) for approximately 1,500 dwellings. Policy N20 requires a transport assessment and mitigation, including consideration of cumulative impacts on key routes and junctions.
- 6.6. The IDP confirms completion of the North West Relief Road (NWRR) but also states that work continues to identify whether an extension is required from the A5199 to the A43 to form a northern orbital route.
- 6.7. The Local Plan similarly frames the Northern Orbital Road as something that “consideration will be given to” without safeguarding, alignment, delivery triggers, costs, or a funding strategy.
- 6.8. To ensure the Plan is justified and deliverable, WNC should identify whether N20 (alone or cumulatively with other northern Northampton growth) depends on a northern orbital/relief intervention and if so, the Plan should set out the preferred approach, costs, delivery mechanism and phasing triggers, including contingencies should that scheme not proceed.
- 6.9. The position remains unresolved at Regulation 18 and the draft Plan does not indicate whether a northern orbital / relief intervention is required to support the scale of growth proposed in the draft Plan or even how this would be funded or delivered.

Infrastructure capacity and provision (transport)

- 6.10. The transport chapter confirms that strategic testing is being undertaken and that full conclusions have not yet been made at this stage of plan preparation. This is a material issue given the scale of change proposed at N20 and the site policy requirement to demonstrate capacity and mitigation for cumulative impacts.
- 6.11. The Council should publish (ahead of Regulation 19) a transparent schedule of transport mitigation required to support N20 and the wider northern Northampton growth area, including:
 - the specific junctions/corridors affected (A508/A43 interface, local network links and identified cumulative impact locations);
 - the mitigation package (highway, bus and active travel);
 - scheme cost estimates; and
 - clear delivery triggers aligned to the housing trajectory.
- 6.12. National Highways’ Regulation 18 response refers to the need for updated modelling, further assessment of cumulative effects on the SRN and a strengthened transport evidence base to support the Plan. This is a material issue given the scale of change

proposed at N20 and the site policy requirement to demonstrate capacity and mitigation for cumulative impacts.

Sustainable transport and accessibility

6.13. Policy N20 requires a “sustainable and integrated transport network” including safe and direct walking, wheeling, cycling and public transport routes and strong connections to nearby neighbourhoods and Northampton town centre. The Plan also identifies a “step-change” in bus service provision as part of strategic connectivity.

6.14. To be effective, these requirements need to be tied to specific, early-phase deliverables (particularly bus services and safe active travel links) rather than deferred to later masterplanning. The Council should demonstrate how N20 will achieve genuinely competitive sustainable access from the early occupations and how this aligns with the Local Transport Plan interventions referenced in Chapter 14.

Traffic impact report

6.15. The WSP “Traffic impact” report⁸ provided for the earlier draft plan does not transparently assess the current Regulation 18 strategy that includes N20 and the same report shows PM peak count validation failures at Boughton Green (ATC_143), which indicates further local validation/survey and junction assessment is likely required before reliance can be placed on modelling conclusions for the Boughton/A508 corridor.

6.16. The Plan should therefore ensure that the Regulation 19 evidence base includes N20 in the strategic testing and provides a clear, published mitigation strategy for the affected network.

Utilities and services (water / wastewater / electricity)

6.17. The IDP identifies that sewerage infrastructure in Northampton is at capacity and that additional flows from growth may cause flooding in the existing network, requiring upgrades. The IDP also identifies capacity works at Great Billing WRC within the plan period.

6.18. Given Policy N20’s explicit requirement to address “water and water recycling infrastructure”, the Plan should set out how the utilities strategy for N20 will be secured, including evidence of provider engagement, required reinforcements and delivery triggers aligned to the housing trajectory.

6.19. In addition, the IDP highlights electricity supply works required in Northampton in the medium term. The Plan should demonstrate how utilities reinforcement (electricity/water/wastewater) is planned and funded alongside the scale of growth proposed in the northern Northampton area.

⁸ The traffic impact of the draft West Northamptonshire Local Plan (May 2024)

Site constraints (including former quarry land)

- 6.20. The Plan identifies that N20 contains a former quarry and that the extent/condition must be understood through investigation, potentially influencing ground conditions, layout and green infrastructure design.
- 6.21. This is directly relevant to deliverability and abnormal cost risk (ground remediation, SuDS strategy, utilities routing and potential constraints on highway alignment/earthworks). These matters should be explicitly reflected in both the IDP scheme planning and the viability evidence prepared for Regulation 19.

Viability

- 6.22. The Council's Local Plan Viability Assessment (March 2025) states it has not undertaken site-specific testing of allocations and recommends further review prior to Regulation 19.

Given the scale of infrastructure and mitigation requirements that attach to N20 (transport, utilities, heritage/landscape constraints), the Regulation 19 evidence base should include a site-specific appraisal (or equivalent transparent costed infrastructure schedule) demonstrating that the required mitigation and utilities reinforcements are viable and deliverable, with clear funding mechanisms and trigger points.

- 6.23. Overall, the transport and infrastructure evidence does not show a resolved or allocation-ready position for N20 at Regulation 18. Rather, the Council's own material, read alongside National Highways' response, indicates that key questions of infrastructure need, transport impact, mitigation, cost, funding and delivery remained subject to further modelling, further assessment and further IDP work. In those circumstances, the allocation cannot yet be said to rest on a clear, complete and justified infrastructure strategy.

7. Heritage and Townscape

This section relates primarily to Policies BN1-BN4 and draws on the Boughton Conservation Area Appraisal and Management Plan, Historic England guidance and the Council's heritage evidence.

Boughton Heritage

- 7.1. Boughton is a historic estate village containing a designated Conservation Area, numerous listed buildings, Scheduled Monuments within the parish and a strong historic relationship with Boughton Hall, Boughton Park and the wider rural landscape. The Boughton Conservation Area Appraisal makes clear that the significance of the village derives not only from its buildings, but from the relationship between the settlement, the parkland landscape, open spaces, views and tree structure.
- 7.2. This is not a matter of whether a small number of designated assets can be protected from direct physical harm. It is whether the allocation would undermine the setting, legibility and historic identity of Boughton as a distinct village whose significance depends in part on openness, topography, parkland influence, long views and a clear relationship with the surrounding countryside. The Conservation Area Appraisal provides evidence that these wider relationships are central to significance. It identifies views into and out of the village as concentrated on the undulating landscape of the park and the distant follies and notes that parkland trees create a sense of unity between the village and the park.
- 7.3. In our view, a fundamental weakness of the Local Plan is that it does not properly address the heritage context. It acknowledges certain assets, but it does not show that the allocation has been selected and shaped on the basis of a robust understanding of significance, setting and the capacity of this location.

Boughton Conservation Area and Historic Settlement Character

- 7.4. The Boughton Conservation Area Appraisal provides a clear summary of what is significant about the village. It describes Boughton as a compact and nucleated historic village, predominantly 17th to 19th century in character, with a high level of coherence created by the extensive use of Boughton stone, slate and thatch, a well-retained medieval street pattern, narrow enclosed streets and a strong village centre around Butcher's Lane and Church Street.
- 7.5. That character is not self-contained. The Appraisal is clear that the character of the village and that of the surrounding parkland landscape are intrinsically linked. It also records that, despite its close proximity to Northampton, Boughton has retained its rural village character.

- 7.6. The spatial analysis in the Appraisal reinforces the point. Church Street is described as tightly grained and enclosed, with strong building lines and important views to the parish church and Boughton Park gate piers. Butcher's Lane is described as having a strong character association with the parkland to the west, with excellent views of the park. Vyse Road is identified as a principal approach where open views of parkland, mature planting and a distinct avenue-like character contribute strongly to the experience of arrival.
- 7.7. A strategic allocation in this location would not simply add development near a village. It would alter the wider context in which Boughton is experienced. It would push Northampton's urban edge further north into land that presently supports Boughton as a separate historic settlement with a parkland setting. This goes to the heart of the village's character and significance.

Heritage assets affected by N20

- 7.8. The Boughton Conservation Area, the listed buildings within and around the village, Boughton Hall and its Grade II Registered Park and Garden, the Boughton Park follies, Old St John's Church and the Boughton Bowl Barrow all form part of the heritage context of this area. The Conservation Area Appraisal records that Boughton parish contains 26 Grade II listed structures as well as two Scheduled Ancient Monuments, namely the Boughton Bowl Barrow and Old St John's Church and confirms that Boughton Park is registered at Grade II.
- 7.9. The Local Plan itself accepts that the site contains the Boughton Bowl Barrow and that immediately to the east lies Boughton Hall and its Grade II Registered Historic Park and Garden. It also acknowledges that the site's context is sensitive because of its role in the setting of nearby heritage assets.
- 7.10. That acknowledgement is welcome, but it is not sufficient. Simply identifying assets does not amount to a heritage-led allocation. The question is whether WNC has properly assessed how the allocation would affect the setting and the historic relationships between the assets. Based on the material currently before us, it appears that WNC has not.

Setting impacts

- 7.11. The Conservation Area Appraisal expressly states that significance derives not only from physical presence, but also from setting. It identifies the surrounding countryside and adjacent parkland as providing a significant rural setting to the village core. It identifies major long views westwards to the undulating landscape of Boughton Park, northwards from Vyse Road across parkland and wider views across open countryside. It also records that avenue-style planting along routes including Vyse Road and Butcher's Lane contributes to long, channelled views and a sense of parkland enclosure.

- 7.12. The Appraisal states that Boughton is surrounded by a variety of open spaces which help form a buffer from Northampton and that this combination of parkland, farmland, historic industry and forestry is integral to the character of Boughton.
- 7.13. Therefore, Boughton is part of the heritage setting of the village and part of the reason Boughton is still a distinctive place. Once the land is allocated for major development, the effect is not confined to the footprint of buildings. The relationship between village, parkland, countryside and Northampton's urban edge will be forever altered.
- 7.14. Historic England's own advice on site allocations⁹ makes clear that the site selection process must understand what contribution the site in its current form makes to the significance of affected heritage assets, including through setting and must assess likely effects by reference to matters such as topography, key views, scale, massing, character, cumulative effects and wider environmental changes. It also makes clear that avoiding harm may require amendments to site boundary, quantum, layout, density, heights and the protection of key views.
- 7.15. The Local Plan identifies heritage receptors but does not show that it has properly assessed what contribution this site presently makes to their significance, whether the scale of allocation is acceptable in principle, or whether the harm could only be avoided by a different boundary, quantum or form of development.

Archaeological Interest

- 7.16. The Boughton Bowl Barrow is a Scheduled Monument within the allocation area and the wider Boughton landscape is archaeologically sensitive, with evidence of prehistoric, Roman, Iron Age, Anglo-Saxon and medieval activity. The Conservation Area Appraisal confirms that the parish contains sites of archaeological importance spanning several thousand years and that development involving excavation should proceed only with appropriate professional assessment and regard to the potential for buried remains.
- 7.17. That matters at plan-making stage. Historic England guidance makes clear that site-specific studies, including archaeological desk-based work and field investigation where necessary, may be needed to inform allocations. For a site containing a Scheduled Monument and forming part of a wider archaeologically sensitive landscape, archaeology should influence the principle, extent and capacity of the allocation from the outset. The Local Plan does not clearly demonstrate that this has happened.
- 7.18. The Appraisal's management section is explicit that Boughton parish contains sites of archaeological importance spanning several thousand years, that the area has the potential to yield further archaeology which would enhance understanding of the village and wider landscape and that development involving below-ground excavation should

⁹ The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3

have regard to the potential for archaeological remains with professional advice and appropriate assessment.

- 7.19. Historic England’s advice note expressly recognises that site-specific studies, including archaeological desk-based assessment and fieldwork, may be necessary to provide adequate information for allocation. It also makes clear that evidence gathering should begin before or during plan preparation so that soundness can be demonstrated.
- 7.20. The Local Plan treats archaeology mostly as a ‘later-stage issue’. Where a site contains a Scheduled Monument and sits within a wider archaeologically sensitive landscape, archaeology should influence the principle, extent and capacity of the allocation from the outset. The Plan does not currently demonstrate that this process has been followed.

Townscape and Approach into Boughton

- 7.21. The Conservation Area Appraisal describes Vyse Road as an important approach bordered by open views of Boughton Park before the road bends into a distinctly avenue-like route lined with mature trees. It notes that, upon reaching the village core, the road turns sharply up Church Street, presenting an open view of Griffin House and the cottages at Butcher’s Lane.
- 7.22. The Appraisal identifies important short and long views, including views to the Boughton Hall gate piers, views northwards down Butcher’s Lane evoking a strong sense of rurality and views in which the church, stone walls, thatched cottages, mature trees and parkland setting combine to create a clearly legible historic village.
- 7.23. These form part of the townscape structure of Boughton and help define the village edge, the experience of arrival and the distinction between the historic settlement and the wider landscape. A strategic allocation at N20 would inevitably alter that condition by intensifying the urban edge to the south and west and by weakening the sense that Boughton sits beyond a landscape transition.
- 7.24. The Plan treats edge treatment as if it can solve a deeper townscape issue. Any solution that is simply about how a ‘boundary can be landscaped’ would disregard how the setting of the village edge and wider landscape will be fundamentally altered through strategic development west of the A508.

National Policy and Guidance

- 7.25. In a location such as N20, containing the Boughton Bowl Barrow and affecting the setting of Boughton Conservation Area and Boughton Park, that points clearly to the need for a proportionate but robust Heritage Impact Assessment at plan-making stage. The problem here is not merely that more work may be needed later. It is that heritage appears not to have been used with sufficient rigour to determine whether this allocation, at this scale and in this configuration, is appropriate in the first place.

- 7.26. The wider national policy direction is the same. The NPPF requires plans to be underpinned by relevant and up-to-date evidence and to be justified, effective and consistent with national policy. It also requires a positive strategy for the conservation and enjoyment of the historic environment, including the desirability of sustaining and enhancing significance and drawing on the contribution made by the historic environment to the character of a place.
- 7.27. National policy and guidance also make clear that significance derives not only from physical presence but also from setting, that understanding significance and setting early can inform more sensitive alternatives and that where a site includes or has the potential to include heritage assets with archaeological interest, proportionate assessment and where necessary, field evaluation should inform the planning process. Heritage assessment is supposed to inform allocation strategy - not postponed until after the strategic decision has already been taken.
- 7.28. The Plan identifies heritage constraints at a high level, acknowledges sensitivity in broad terms and then leaves the substantive work on significance, setting, archaeology, layout and mitigation to later stages.

Allocation Policy

- 7.29. The Local Plan text for N20 acknowledges medium-high landscape sensitivity, the Boughton Bowl Barrow and the proximity of Boughton Hall and its Registered Park and Garden. Beyond broad references to sensitivity and masterplanning, it does not establish a heritage-led framework for the site.
- 7.30. In particular, the policy does not explain what setting relationships must be preserved, what degree of change is acceptable, how the setting of the Bowl Barrow is to be respected, how the setting of Boughton Park and the Conservation Area are to be protected, or how the historic identity of Boughton as a separate settlement is to be maintained. It identifies heritage receptors, but it does not turn them into a robust allocation strategy.
- 7.31. Figure 16 does not demonstrate whether the allocation can proceed at this scale and in this form without unacceptable harm to heritage significance, setting and townscape character. The key heritage and townscape matters needed to be addressed before the allocation was proposed and are still required before proceeding any further with the Local Plan.

Conclusion

- 7.32. BPC objects to Policy N20 on heritage and townscape grounds. The allocation is not supported by a sufficiently robust heritage-led assessment, fails properly to conserve the setting and identity of Boughton as a distinct historic settlement and does not demonstrate that the scale and form of development proposed can be accommodated

without unacceptable harm to designated heritage assets, archaeology, townscape character and the historic relationship between Boughton and its surrounding landscape.

8. Landscape, Settlement Edge and Strategic Separation

8.1. This section responds primarily to Policies BN6-BN8 and draws on the Landscape Sensitivity Assessment, Urban Fringe evidence and related spatial analysis

Boughton Park Estate Landscape

8.2. The proposed allocation lies within a wider landscape framework in which Boughton Park is a defining historic and landscape influence. The Council's own Landscape Sensitivity Assessment ("LSA") (May 2025) identifies historic parkland at Boughton Park as a notable landscape feature in both assessment unit N2 and assessment unit N9. In relation to N2, the LSA states that the Registered Park and Garden of Boughton Hall lies on the western edge of parcel 2a and that the character of Boughton village and the surrounding parkland landscape are intrinsically linked through their associative development. In relation to N9, it again identifies Boughton Park as a notable landscape feature and requires the maintenance of a landscape buffer to Boughton Park.

8.3. This demonstrates that this is not a case of retaining some hedgerows, adding planting and claiming that landscape harm has been addressed. The Council's own evidence identifies a much broader and more sensitive relationship between village, parkland, landform, openness and historic setting. The effect of allocating this land cannot therefore be understood as a simple urban extension onto a neutral edge. It is development within the setting of Boughton Park and within a landscape structure which the Council's own evidence recognises as distinctive.

8.4. In our view, the Local Plan does not address this matter properly. The issue is whether the allocation itself is compatible with the historic parkland-influenced landscape character of this area in the first place. That question has not been properly answered.

Landscape Sensitivity

8.5. The Council's own evidence is clear that the relevant landscapes are sensitive to development. Assessment unit N2 is assessed as having **moderate-high sensitivity** to residential development. The LSA is explicit that this sensitivity arises from the separation role the assessment unit performs between Northampton and the fringe villages, together with the presence of historic landscape features at Boughton Park. Assessment unit N9 is also assessed as having **moderate-high sensitivity** to residential development, arising from the landscape's moderate to good condition, the presence of historic villages, scenic quality, tranquillity in places and recreational value.

8.6. The LSA then goes further. In relation to N2 it identifies as key sensitivities the potential further coalescence of Northampton with Boughton and Moulton, the role of Boughton Park as a notable historic landscape feature and the presence of conservation areas at Boughton, Moulton and Pitsford. Its development guidelines require the Council to

conserve the rural character of the landscape around Northampton, avoid visual or actual coalescence of neighbouring settlements, maintain the integrity and identity of each settlement and retain distinctive views identified in local appraisals and village design documents.

- 8.7. In relation to N9, the LSA identifies elevated landform, panoramic views, public access routes, Harlestone Heath woodland and Boughton Park as key sensitivities. Its guidance is to conserve open, undeveloped skylines, utilise landform to integrate development and maintain a landscape buffer to Boughton Park.
- 8.8. This is evidence that this is a sensitive landscape in which change is constrained by landform, openness, settlement pattern, historic landscape structure and the role the land plays in maintaining separation. Yet the Local Plan does not translate that evidence into a robust assessment of what this landscape can accommodate or whether harm can be avoided.

Settlement Edge Character

- 8.9. The LSA describes N2 as the broad valley landscape around Boughton and Moulton, with the villages sitting along the southern valley slopes. It notes that the landscape plays an important separation role between Northampton and the fringe villages, that development already extends south along Harborough Road North linking Boughton and Northampton and that much of this land is designated as Green Wedge. It also records that views towards settlement edges are currently softened and generally well-integrated into the landscape by existing vegetation
- 8.10. The remaining openness plays an integral role allowing Boughton to read as a distinct settlement rather than simply the 'outer edge of Northampton'. Once that edge is pushed further into the open countryside through a major allocation, the character of the edge is fundamentally altered. It ceases to be a softened rural transition and becomes a deeper, harder and more urbanised development front.
- 8.11. The LSA also notes that the underlying ironstone geology is expressed in local vernacular buildings, particularly in Boughton and Moulton and that the Boughton Conservation Area Appraisal and Village Design Statement identify important views across the assessment unit in all directions.
- 8.12. That evidence reinforces the point that the existing edge has a strong local character and is not simply a loose development opportunity. It is part of the way Boughton is experienced: as a historic village with an identifiable relationship to its surrounding rural landscape. The Local Plan does not properly explain how a strategic allocation in this location can be reconciled with that existing edge character. In our view it is not possible.

Relationship between Northampton and Boughton

- 8.13. The key issue is whether the Land North of Buckton Fields can absorb a further 1,500 dwellings without materially eroding the distinction between Northampton and Boughton. The Council's methodology has treated coalescence, strategic gaps and

landscape sensitivity as decisive in ruling out other Northampton fringe sites. It concludes that the site would not compromise separation because Boughton lies beyond the A508 and the allocation would form a logical continuation of Buckton Fields. That conclusion is not self-evident and requires much more robust scrutiny. A road corridor does not necessarily preserve separation where the scale of urbanisation, movement patterns and edge effects change the way places are experienced and understood.

- 8.14. The wider Northampton landscape context is also relevant. The LSA explains that Northampton sits in a shallow bowl adjacent to the River Nene and is surrounded by a ring of higher land. The land to the north therefore contributes not only to immediate edge conditions but to the wider setting and containment of the town.
- 8.15. Boughton is not just another roadside fringe settlement. It has a historic core, a conservation area, an important relationship with Boughton Park and important identified views across the surrounding landscape. The draft allocation would materially alter that relationship. It would shift Boughton further into Northampton's sphere of outward urban growth and weaken the clear distinction which still exists between the village and the urban edge.
- 8.16. The Council's own development guidelines for N2 underline the point, requiring the conservation of rural character around Northampton, the avoidance of visual or actual coalescence and the maintenance of the integrity and identity of each settlement.

Erosion of Separation

- 8.17. The Council's own evidence identifies the **potential further coalescence of Northampton and the fringe villages of Boughton and Moulton** as a key sensitivity. The associated guidance is to avoid visual or actual coalescence so as to maintain the integrity and identity of each settlement.
- 8.18. The wording "further coalescence" is important. The process of erosion has already started. The LSA records that the southern part of Moulton connects with Northampton to the south, that there is nearly continuous development along the A43 corridor and that development extends south along Harborough Road North linking Boughton and Northampton.
- 8.19. In that context, **the remaining open land North of Buckton Fields is not residual simply available for growth. The land continues to perform a separation function between Northampton and historic Boughton.** Once substantial built development is inserted into that space, the strategic gap is diminished in both physical and perceptual terms. Narrow green corridors, edge planting or a "sensitive edge treatment" do not solve that issue.
- 8.20. The Local Plan does not properly address the question of whether the strategic separation between Northampton and Boughton can survive the scale of development now proposed. Instead, it assumes that the issue can be managed later through a masterplan

and mitigation. The Local Plan should first demonstrate that the principle, scale and form of growth are acceptable in this landscape and settlement context.

- 8.21. Figure 16 of the Local Plan identifies constraints and broad landscape components; however it does not establish a credible site-specific landscape strategy. It does not explain how the allocation would conserve settlement identity, how it would maintain separation, how it would respond to the setting of Boughton Park, or how the elevated landform sensitivities identified by the LSA would actually be respected. In substance, it is descriptive rather than strategic.
- 8.22. It is not enough for the Plan to defer landscape and visual justification to application stage. By that point the allocation decision will have already been taken and the principle of major development in this location will have been accepted. The burden at the Local Plan stage is on WNC to demonstrate now, through evidence, that the land can be allocated without unacceptable harm to landscape character, settlement edge character and strategic separation.

9. Environmental Considerations

This section relates primarily to Policies PL5 and BN9-BN18 and draws on the Green Infrastructure and Natural Capital evidence, Habitats Regulations Assessment Screening, SFRA material and Integrated Water Management evidence

- 9.1. This section addresses the principal environmental considerations arising from the proposed allocation and wider growth strategy affecting Boughton Parish, including biodiversity and green infrastructure, environmental policy layers and ecological sensitivity, flood risk and the river corridor and the extent to which these matters have been properly assessed through the Plan's evidence base. Our concern is not simply that these matters may require mitigation at planning application stage, but that they go directly to the suitability of the site, the amount of land that can realistically be developed and whether the allocation has been properly assessed at plan-making stage.

Biodiversity, Green Infrastructure and Ecological Networks

- 9.2. The proposed allocation sits within a wider landscape that performs important green infrastructure and ecological functions. The Council's own Green Infrastructure and Natural Capital evidence makes clear that green infrastructure should be understood as a connected, multifunctional network delivering biodiversity, flood management, climate resilience, recreation and wider wellbeing benefits. It also makes clear that this evidence is strategic in nature and that more detailed work is required in applying it to strategic site assessment.
- 9.3. The Plan should not proceed on the basis that biodiversity, habitat connectivity and green infrastructure implications can simply be dealt with later through mitigation. Where retained landscape features, habitat corridors, river corridors, drainage land and publicly accessible green space all need to be accommodated, these matters are likely to have a direct bearing on the net developable area, layout and capacity of the site. At present, it is not clear that those implications have been assessed.

Nene Valley Nature Improvement Area and Environmental Policy Layers

- 9.4. It is notable that the Council's own policy mapping appears to place a substantial part of the proposed allocation within the Nene Valley Nature Improvement Area (Policy BN16) and in close relationship to the wider River Nene green-blue infrastructure network. While BN16 is not equivalent to a statutory ecological designation, it is not an arbitrary or policy layer.
- 9.5. The underlying Nene Valley Nature Improvement Area evidence describes a strategic landscape-scale initiative covering approximately 41,000 hectares across the River Nene corridor and its tributaries, including wetlands, gravel pits, farmland and associated

habitat networks. Its purpose is to protect, enlarge and connect wildlife habitats, improve ecosystem services, address deficiencies in accessible natural greenspace and embed these principles within local planning policy in the context of substantial growth pressures. The same material identifies development as the single biggest threat to the future of the Nene Valley if not properly planned and designed.

- 9.6. In that context, the Council should explain clearly how the allocation of N20 is consistent with the strategic environmental role of this land. In particular, the Plan should identify what this means for habitat connectivity, open land, multifunctional green infrastructure, accessible natural greenspace, river-corridor enhancement and the likely reduction in net developable area once those requirements are properly taken into account.

Habitats Regulations Assessment and Recreational / Ecological Pressure

- 9.7. The Council's own Habitats Regulations Assessment Screening confirms that the Local Plan gives rise to likely significant effects in relation to the Upper Nene Valley Gravel Pits SPA / Ramsar, including recreational disturbance, direct loss of functionally linked land and non-physical disturbance and that water-quality effects could not be ruled out at this stage. It also states that, in the absence of mitigation, the Local Plan is likely to result in significant effects on the SPA / Ramsar and must therefore proceed to Appropriate Assessment.
- 9.8. The environmental implications of growth in this area are therefore not speculative or minor. They are acknowledged in the Council's own HRA evidence as requiring further assessment and mitigation.
- 9.9. In relation to N20 specifically, the HRA notes that winter surveys are required to determine whether the site is used by overwintering Golden Plover / Lapwing and whether it functions as functionally linked land to the Upper Nene Valley Gravel Pits SPA, with mitigation required if that is the case. This indicates that the allocation is proceeding despite an acknowledged evidence gap on a potentially important ecological issue. The Plan should not assume that this can simply be left to a later stage without implications for suitability, layout, capacity and deliverability.

Flood Risk, River Corridor and Water Management

- 9.10. Flood risk is also a relevant consideration in this location, not only in terms of flood zones themselves but in relation to the wider river and tributary context, surface water management, drainage land, climate resilience and the role of the River Nene corridor as part of a wider multifunctional environmental network.
- 9.11. The Plan itself acknowledges that Section 14 of the NPPF and associated Planning Practice Guidance require strategic policies and allocations to be supported by a Strategic Flood Risk Assessment (SFRA) addressing flood risk from all sources and cumulative impacts. It further states that, to accompany the preparation of the Local Plan, West

Northamptonshire is undertaking an Integrated Water Management Study incorporating a replacement SFRA, intended to replace the earlier West Northamptonshire SFRA.

- 9.12. That is important because **the currently available SFRA material is dated**. The available Level 1 SFRA update is dated March 2019, with accompanying strategic mapping dated 2017 and the SFRA itself records that site-specific assessments were not undertaken for Northampton because no sites had been identified there at that time. While the SFRA refers in general terms to flood risk from all sources, it is not clear that it provides a sufficiently up-to-date or allocation-specific basis for the current Strategic Plan and current site choices.
- 9.13. In those circumstances, it is not presently clear where the updated Integrated Water Management Study / replacement SFRA has been published, how it has informed the assessment of current allocations, or where the application of the Sequential Test and any related Exception Test conclusions for those allocations are set out. That raises a legitimate question as to whether the Plan is supported by an up-to-date and sufficiently transparent flood-risk evidence base.

Conclusion

- 9.14. For the reasons set out above, we do not consider that the Plan currently demonstrates a sufficiently robust environmental justification for the proposed allocation and associated scale of growth affecting Boughton Parish. The Council's own evidence identifies this area as environmentally sensitive and strategically important in green infrastructure, habitat, river-corridor and recreational terms and acknowledges unresolved issues in relation to Habitats Regulations Assessment and flood-risk evidence

10. Design Quality, Place-Making and Settlement Edge

This section relates primarily to Policies PL6 and PL7 and draws on the Boughton Conservation Area Appraisal and Management Plan and the Plan’s design policy framework

- 10.1. The Local Plan places considerable emphasis on design quality, placemaking and local distinctiveness. That is entirely appropriate. However, in the context of Boughton Parish and the proposed allocation at North of Buckton Fields (Policy N20), the issue is not simply whether development can be “masterplanned” in general terms. The key question is whether development in this location would be genuinely **place-based, landscape-led** and responsive to the distinct identity, setting and edge conditions of Boughton, rather than taking the form of another generic urban extension that could be seen as ‘anywhere England’.
- 10.2. This is particularly important because the Plan’s own design policies set a high bar. The design chapter states that placemaking is about creating high-quality places, not simply designing individual buildings and that development should respond positively to local character, support community identity, protect environmental assets and create lasting value. It also makes clear that poorly designed development should be refused.
- 10.3. Policy PL6 is especially relevant. It requires development proposals to respond positively to local character, townscape and landscape setting; maintain the distinct identity and character of individual settlements; avoid coalescence; protect and enhance heritage assets and their settings; retain important views; respond to topography and landform; and promote site-specific, context-responsive design rather than standardised or generic approaches. The supporting text also recognises that the spaces between settlements are important, particularly in rural areas, because they contribute to settlement identity, landscape setting and legible settlement edges.
- 10.4. The Boughton Conservation Area Appraisal and Management Plan (July 2018) identifies it as a distinctive Northamptonshire estate village, historically and visually linked to Boughton Park and the wider undulating parkland landscape. It emphasises that the village has retained its rural character despite its proximity to Northampton and that its significance derives not only from individual buildings but from the relationship between the compact settlement core, local materials, open spaces, tree structure, views and the surrounding parkland setting.
- 10.5. This concern is consistent with Boughton Parish Council’s earlier submissions to WNC. In its previous representations on Northampton’s urban area and related plan matters, the Parish Council accepted that Buckton Fields could be treated as Northampton-related development but did not accept that Boughton village should be treated as part of the town or as part of a coherent network of urban built development. It emphasised that Boughton has three sides of open countryside, is visually read as part of that surrounding

countryside and has a distinct village character and appearance not replicated in Northampton's northern suburban areas. The Parish Council also made clear that villages adjacent to the urban area should be allowed to retain their village status, rather than there being any automatic presumption that physical proximity makes them part of the urban area. Those earlier submissions remain directly relevant to the present allocation.

- 10.6. The Conservation Area Appraisal and Management Plan is useful because it captures exactly why Boughton should not be treated as an "anywhere England" location. The appraisal explains that Boughton and Boughton Park are intrinsically linked; that views into and out of the village are strongly influenced by the surrounding landscape and belts of mature trees; and that open spaces and the wider landscape provide an important buffer from Northampton. It also identifies development pressure on the village edge and on the fringes of Northampton as a specific issue affecting character and setting. As adopted supplementary planning guidance, it is a material planning consideration.
- 10.7. In that context, any development affecting the northern edge of Northampton and Boughton Parish should be expected to follow a genuinely place-based and landscape-led design approach. That means the form, extent and disposition of development should be derived from the landscape setting, topography, settlement pattern, views, separation function, heritage context and local material character of the area, rather than treating those matters as secondary constraints to be "mitigated" after a standard housing layout has been assumed.
- 10.8. That is where a major concern arises. While the Plan speaks strongly of local distinctiveness and high-quality placemaking, there is limited confidence that development in this location would in fact achieve that outcome. The nearby Buckton Fields development does not provide a strong precedent for a truly landscape-led, settlement-sensitive or locally distinctive response to this part of the Northampton edge. The concern is not simply about architectural taste. It is that recent development in this area appears to reflect a largely generic suburban housing approach imposed onto a sensitive landscape setting, rather than a form of development genuinely shaped by that setting.
- 10.9. N20 would extend urban development into an even more sensitive location in relation to Boughton. As set out elsewhere in these representations, the site lies in an area where landscape, separation, ecology, green infrastructure and heritage considerations are already significant. If development here is approached in a conventional volume-housebuilder manner, the likely outcome would be further erosion of settlement edge quality, further suburbanisation of the landscape north of Northampton and further weakening of the distinction between Northampton's urban edge and Boughton's historic rural setting.
- 10.10. The Council's requirement for a masterplan, design code or design statement are only effective if the underlying design premise is right. A design code cannot compensate for

an allocation that is too heavily driven by housing numbers rather than by the capacity of the landscape and settlement edge to absorb development in a coherent way.

10.11. The Conservation Area Appraisal is also helpful in showing what a place-based response would actually need to engage with. It highlights the importance of established building lines, scale, ridgelines, local materials including Boughton stone, key views, tree structure, open spaces and the wider parkland setting. It also recognises the role of the surrounding landscape in shaping the identity of the village. These are not minor details to be addressed through decorative design coding. They are the fundamental ingredients of place.

10.12. If the Council wishes to allocate development in this location, it should therefore demonstrate much more clearly how the scheme would avoid becoming a generic extension to Northampton and instead respond to the specific identity of Boughton and its setting. That would require, at a minimum:

- a genuinely landscape-led masterplanning process;
- a clear settlement-edge strategy;
- a robust approach to preserving separation and avoiding suburban coalescence;
- design principles derived from the character of Boughton and its wider landscape setting; and
- a clear explanation of how the development would differ in form and quality from the standard suburban pattern already seen nearby.

10.13. This expectation is strengthened by the fact that **WNC is the landowner**. If the Council is promoting publicly owned land in such a sensitive location, it should be setting a benchmark for context-responsive design, not merely relying on broad policy aspirations. Public ownership should strengthen confidence in design quality and place-making. At present, however, the combination of the site's sensitivity and the character of nearby recent development gives limited confidence that the outcome would be genuinely exemplary.

10.14. More broadly, there is a credibility issue between the ambition of the draft policy wording and the likely reality of delivery. The Plan rightly seeks development that is locally distinctive, human-scale, landscape-responsive and sensitive to settlement identity. But those aspirations need to be tested against what is likely to be built on the ground. In a location such as this, a policy-compliant scheme in formal terms may still fail to achieve a truly place-based outcome if the layout, density, street pattern, landscape framework and house types remain fundamentally generic.

10.15. For Boughton, that risk is especially serious because the harm would not just be visual. A poor-quality or generic suburban extension in this location would alter the perceived relationship between Northampton and Boughton, weaken the transition from town to countryside, diminish the distinctiveness of the village edge and undermine the character of a place whose significance lies in its specific historic and landscape setting.

10.16. Overall, we do not consider that the Local Plan has yet demonstrated that the proposed allocation at North of Buckton Fields could deliver the type of place-based, landscape-led and settlement-sensitive development that its own design policies require. Boughton is not an interchangeable suburban edge condition. It is a distinctive historic settlement with a particular relationship to landscape, parkland, views, heritage assets and open countryside. The Plan should therefore apply a much more exacting design and placemaking test to this location, particularly given WNC's role as landowner and the limited confidence provided by nearby recent development. In the absence of that, there is a substantial risk that Policy N20 would result in a generic urban extension that fails the Plan's own stated design ambitions.

11. Housing Delivery, Monitoring and Review

This section relates primarily to Chapter 16, Appendix D (Housing Trajectory) and the Plan’s monitoring and trajectory evidence, together with relevant viability and infrastructure evidence.

Housing Trajectory and Delivery Assumptions

- 11.1. We have significant concerns regarding the robustness of the Plan’s housing trajectory, particularly in relation to new strategic allocations such as N20. A housing trajectory should provide a credible basis for understanding when development is likely to come forward, what assumptions underpin delivery and how site constraints, infrastructure requirements, viability considerations and lead-in times have been reflected in phasing.
- 11.2. Appendix 4 confirms that, for new allocations, delivery has been placed in a single year, “arbitrarily” 2030/31, with a year-by-year trajectory to be prepared only for the Regulation 19 version of the Plan. In relation to N20, the trajectory simply attributes 1,500 dwellings to a single year. This is not a genuine delivery trajectory, it is a placeholder and it provides no basis on which to assess the timing, phasing or realism of delivery for a strategic allocation of this scale.
- 11.3. That is a significant weakness in the current evidence base. A site such as N20 cannot be represented through a single arbitrary year in the trajectory without any supporting delivery evidence. The current approach says nothing about likely lead-in times, infrastructure dependencies, outline and reserved matters stages, site servicing, utilities, market absorption, anticipated build-out rates, the likely number of outlets, or the effect of environmental and infrastructure constraints on the timing and pace of delivery.
- 11.4. As set out elsewhere in these representations, there are unresolved questions in relation to transport and access, environmental matters, green infrastructure, Habitats Regulations Assessment, flood risk and water management and the overall form and integration of development. Those matters are capable of affecting both the timing of first completions and the annual rate of build-out. The Plan should therefore be supported by a site-specific delivery strategy for N20, rather than a crude placeholder figure.
- 11.5. National evidence on large-scale housing delivery points strongly against the simplified assumptions currently used by the Council. Lichfields’ recent *Start to Finish*¹⁰ research, based on 179 sites of 500 or more dwellings, finds that for sites of 1,000 dwellings or more it takes on average around five years to obtain detailed planning permission, followed by a further 1.3 to 1.6 years before the first dwelling is completed. For schemes of 2,000 or more dwellings, the mean time from validation of the first application to the first completed dwelling is 6.6 years.

¹⁰ Start to Finish, Third Edition September 2024 (Lichfields)

- 11.6. The same study finds that average annual build-out rates for schemes of 2,000 or more dwellings are typically in the range of 100 to 188 dwellings per annum, while schemes of 500–999 dwellings typically deliver at 44 to 83 dwellings per annum. Importantly, Lichfields also emphasises that such averages are not a substitute for a robust bottom-up assessment of the delivery trajectory for any specific site and that local authorities should take full account of site-specific constraints, absorption rates and delivery circumstances.
- 11.7. Against that benchmark, the current treatment of N20 is plainly not credible. A 1,500-dwelling strategic allocation cannot sensibly be represented as though it will simply arrive in a single year, without any evidence-based phasing, lead-in or build-out assumptions. A strategic allocation of this scale should be supported by a delivery strategy, not simply assigned to a single arbitrary year in the trajectory.
- 11.8. This also has important consequences for the wider evidence base. The housing trajectory should align with the Infrastructure Delivery Plan, viability evidence and monitoring framework. If the Council is relying on major strategic allocations to meet housing needs, the timing of housing delivery should correspond with the timing, trigger points and funding assumptions for key infrastructure, mitigation and servicing requirements. That includes transport measures, education, health provision, utilities, flood and water management, green infrastructure and environmental mitigation. At present, however, the Plan does not provide a sufficiently developed trajectory for N20 to allow scrutiny of whether the IDP and viability assumptions properly align with the likely phasing of development.
- 11.9. Without a genuine year-by-year trajectory for N20 and the other major allocations, it is difficult to assess whether infrastructure is assumed to come forward at the right time, whether the costs and burdens falling on early phases are realistic, whether key mitigation is being deferred too late, or whether the viability evidence properly reflects the cumulative demands likely to arise at different stages of delivery. The weakness of the trajectory is therefore not a narrow technical issue, it undermines confidence in the coherence of the wider plan.

Monitoring and Review

- 11.10. The same issue arises in relation to monitoring. Monitoring is only useful if it is based on realistic assumptions and clear milestones from the outset. If the Plan proceeds on the basis of arbitrary placeholder assumptions for strategic sites, the monitoring framework risks becoming reactive rather than effective. By the time substantial under-delivery becomes apparent, it may be too late to respond through infrastructure reprioritisation, release of alternative sites or an early review of the strategy.
- 11.11. Although the Local Plan contains an implementation and monitoring framework and refers in places to future updates to evidence, it does not presently set out a clear plan-wide review mechanism in the event that major allocations fail to come forward as

anticipated, infrastructure assumptions change, or the evidence base underpinning delivery is materially revised. The clearest review mechanism identified appears to relate to the rural parish housing approach rather than to the Plan's strategic allocations as a whole.

11.12. For a Plan relying on a number of large strategic allocations, the Council should set out much more clearly how delivery of each major allocation will be monitored, what milestones and trigger points will be used, what contingency measures will be taken if delivery falls behind and when an early review of the Plan or its strategic allocations will be undertaken. This is particularly important where the current trajectory for major sites is acknowledged to be provisional and arbitrary.

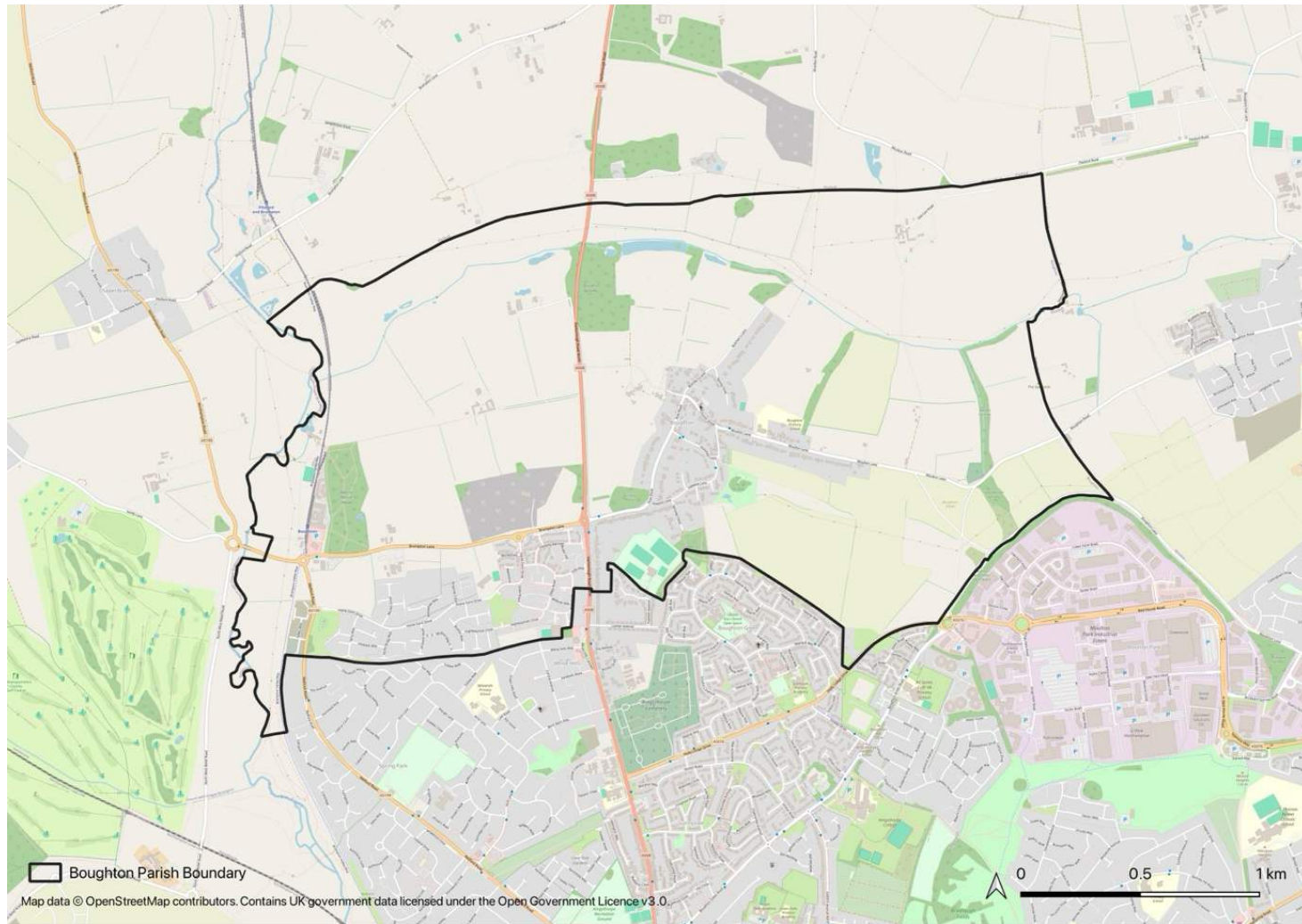
12. Strategic cross-boundary matters (Duty to Cooperate)

- 12.1. Section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by section 110 of the Localism Act 2011) requires the Council to cooperate with other local planning authorities and prescribed bodies in relation to the preparation of development plan documents, so far as this relates to a strategic matter.
- 12.2. In particular, section 33A(2) requires the Council to “engage constructively, actively and on an ongoing basis” in respect of strategic cross-boundary matters throughout the plan-making process.
- 12.3. The consultation material does not signpost or include any Duty to Cooperate (DtC) evidence (for example Statements of Common Ground, agreed matters, or a concise record of engagement on strategic cross-boundary issues). As a result, it is not possible for the Parish Council to understand what strategic matters have been identified as requiring cooperation, which bodies have been engaged, what has been agreed and how this has influenced the Plan’s spatial strategy and infrastructure approach. The Council should publish and clearly signpost the relevant DtC material alongside the Plan documentation (including Statements of Common Ground and a short summary of outcomes/areas of disagreement), so that stakeholders can respond properly at this stage.
- 12.4. Planning Practice Guidance (Plan-making / Maintaining effective cooperation) states that: “Authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated.”¹¹ In this context and as a minimum, the Council should ensure that Statements of Common Ground and related DtC material are published/signposted in a timely way so that stakeholders can understand the outcomes of cooperation and the implications for the Plan’s strategy and deliverability.

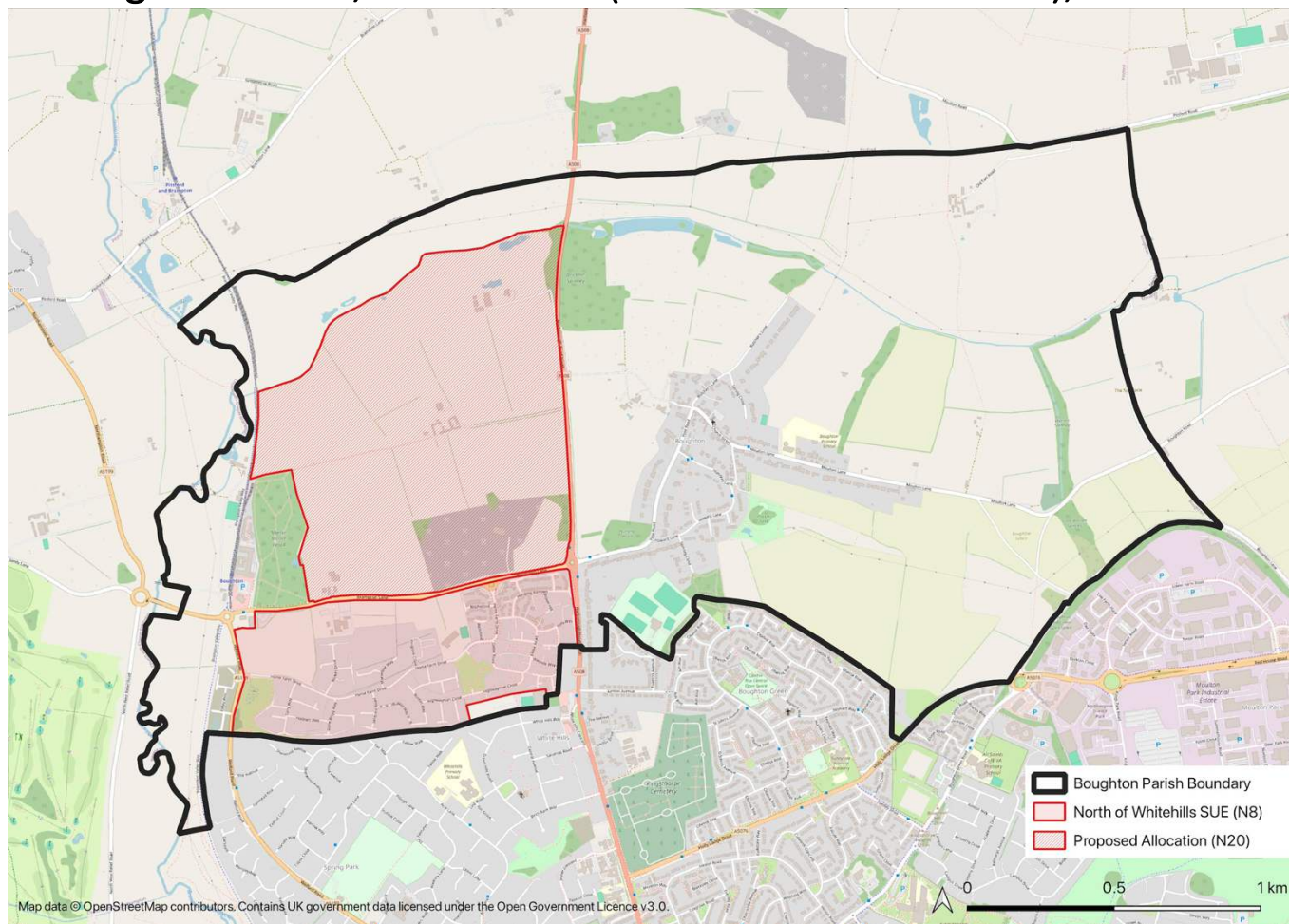
¹¹ (Paragraph 019, Reference ID 61-019-20190315).

APPENDICES

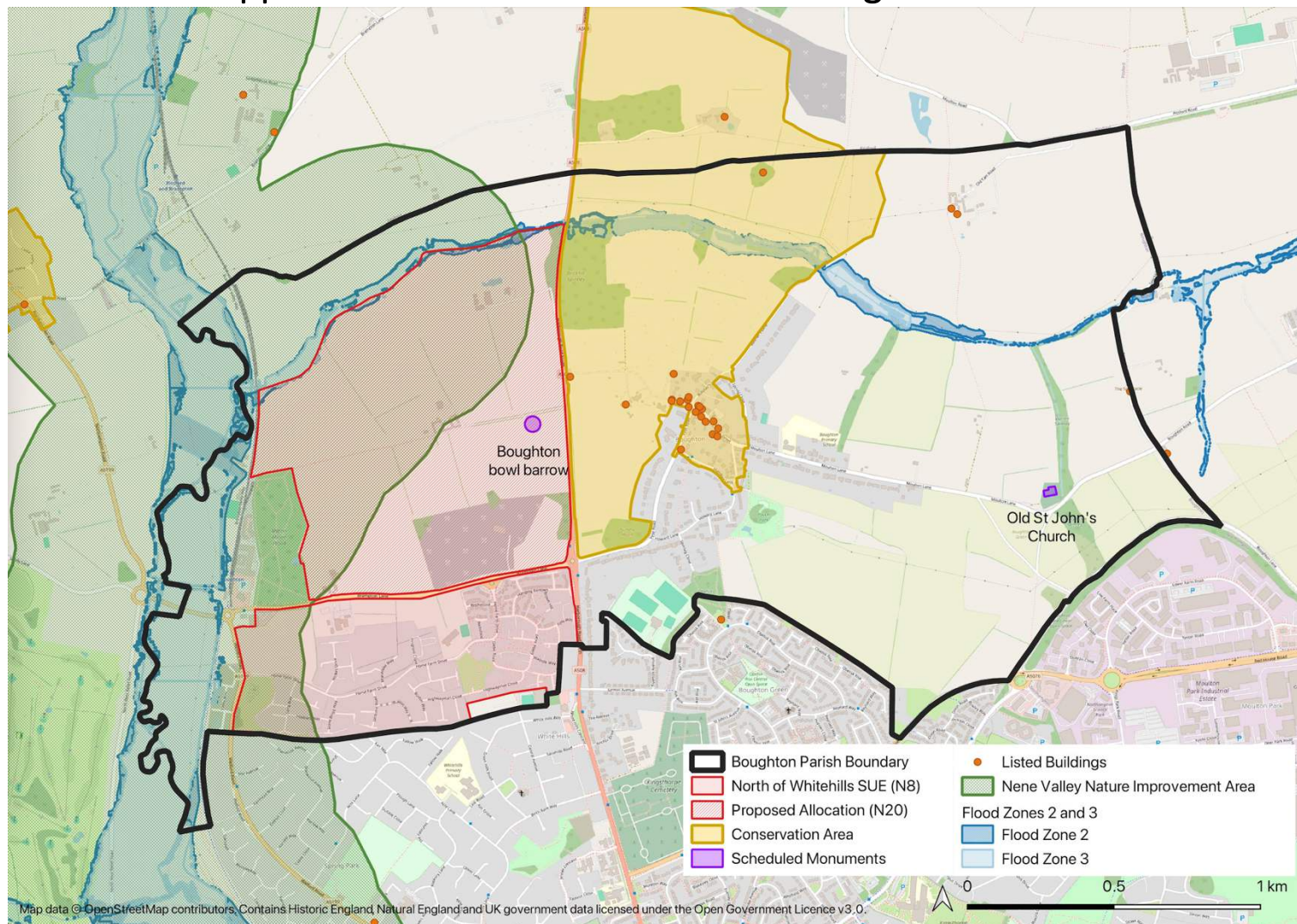
Appendix 1 – Boughton Parish



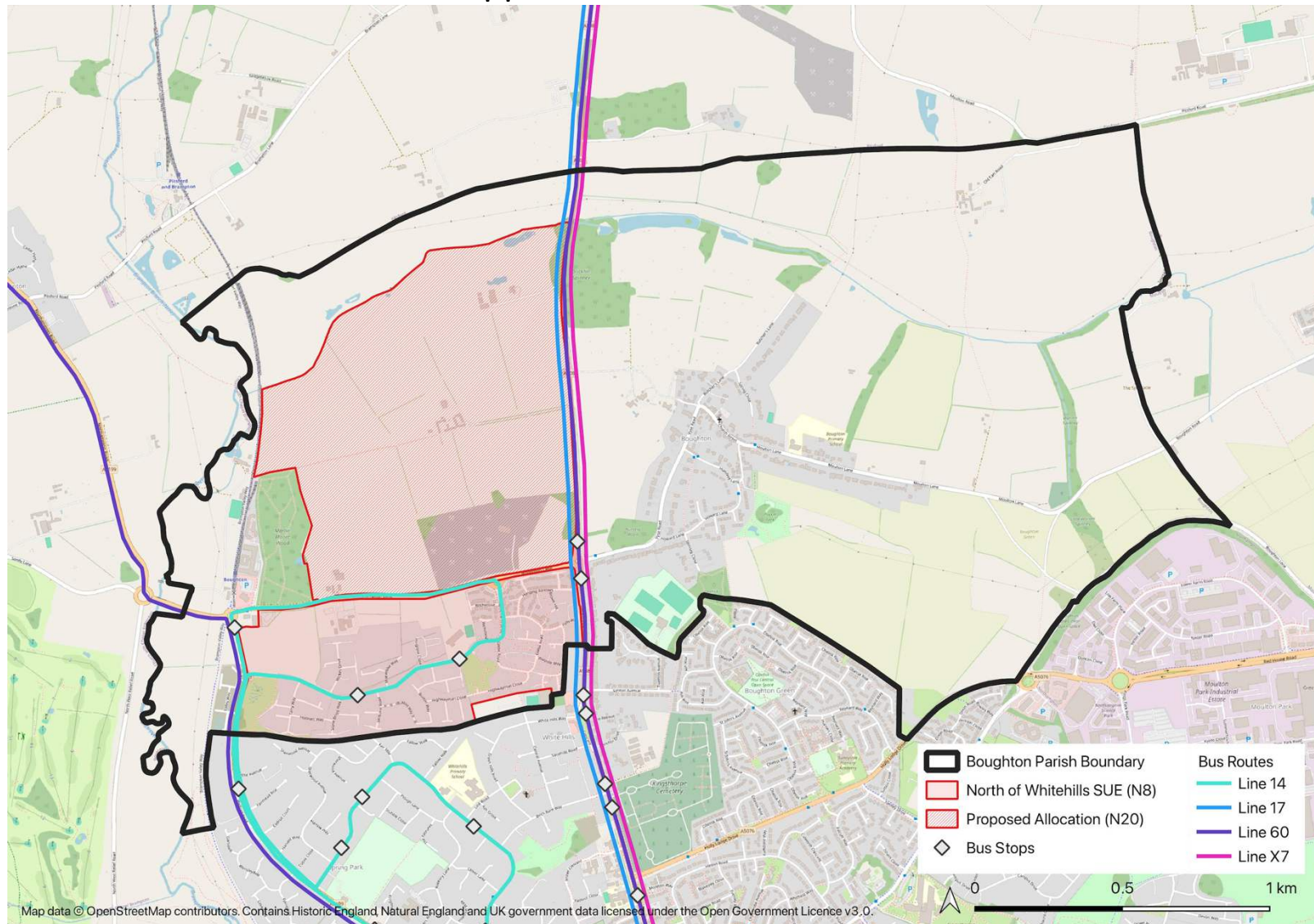
Appendix 2 – Boughton Parish, Policies N20 (North of Buckton Fields), N8 Whitehills SUE (JCS)



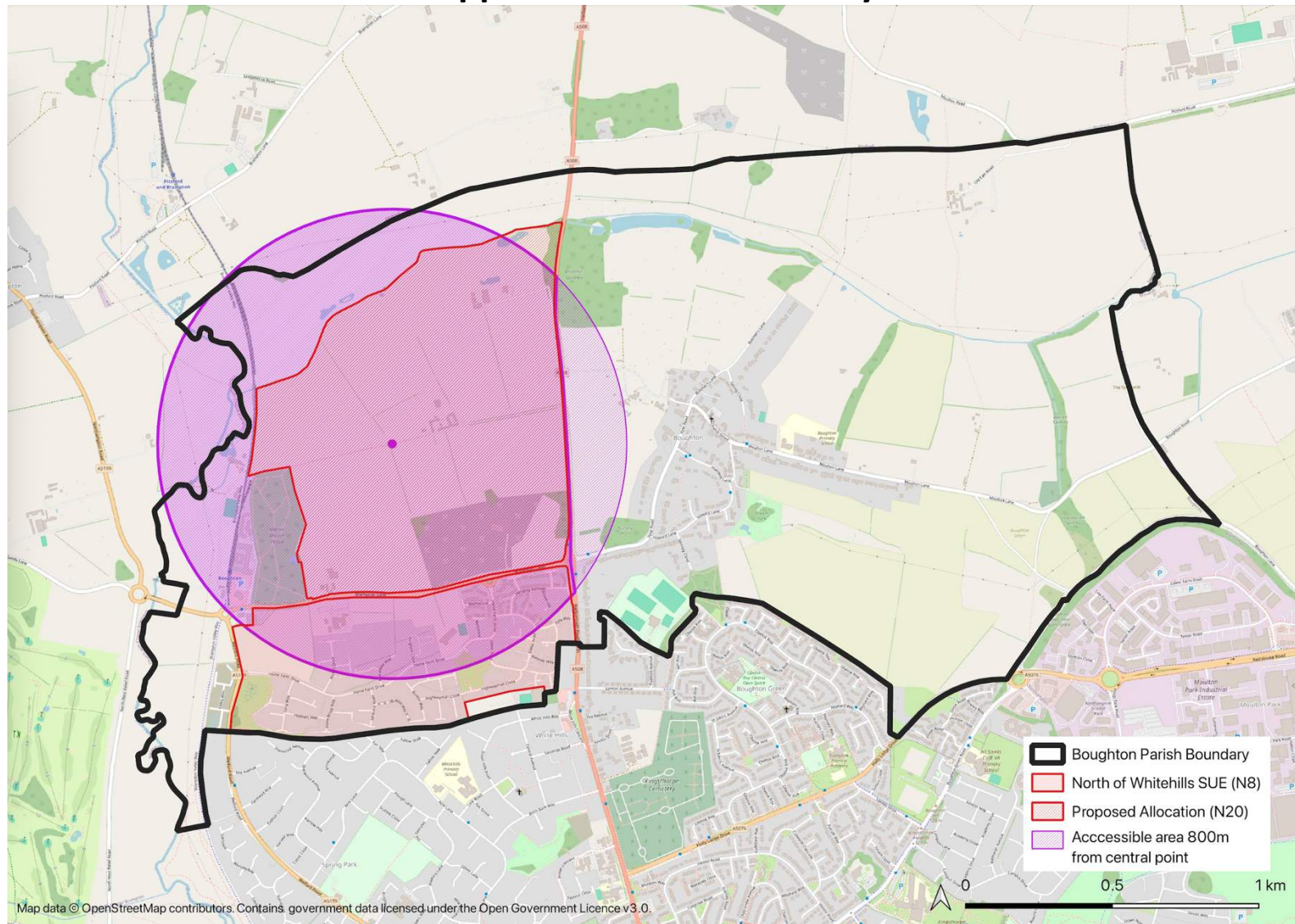
Appendix 3 – Environmental and Heritage Constraints



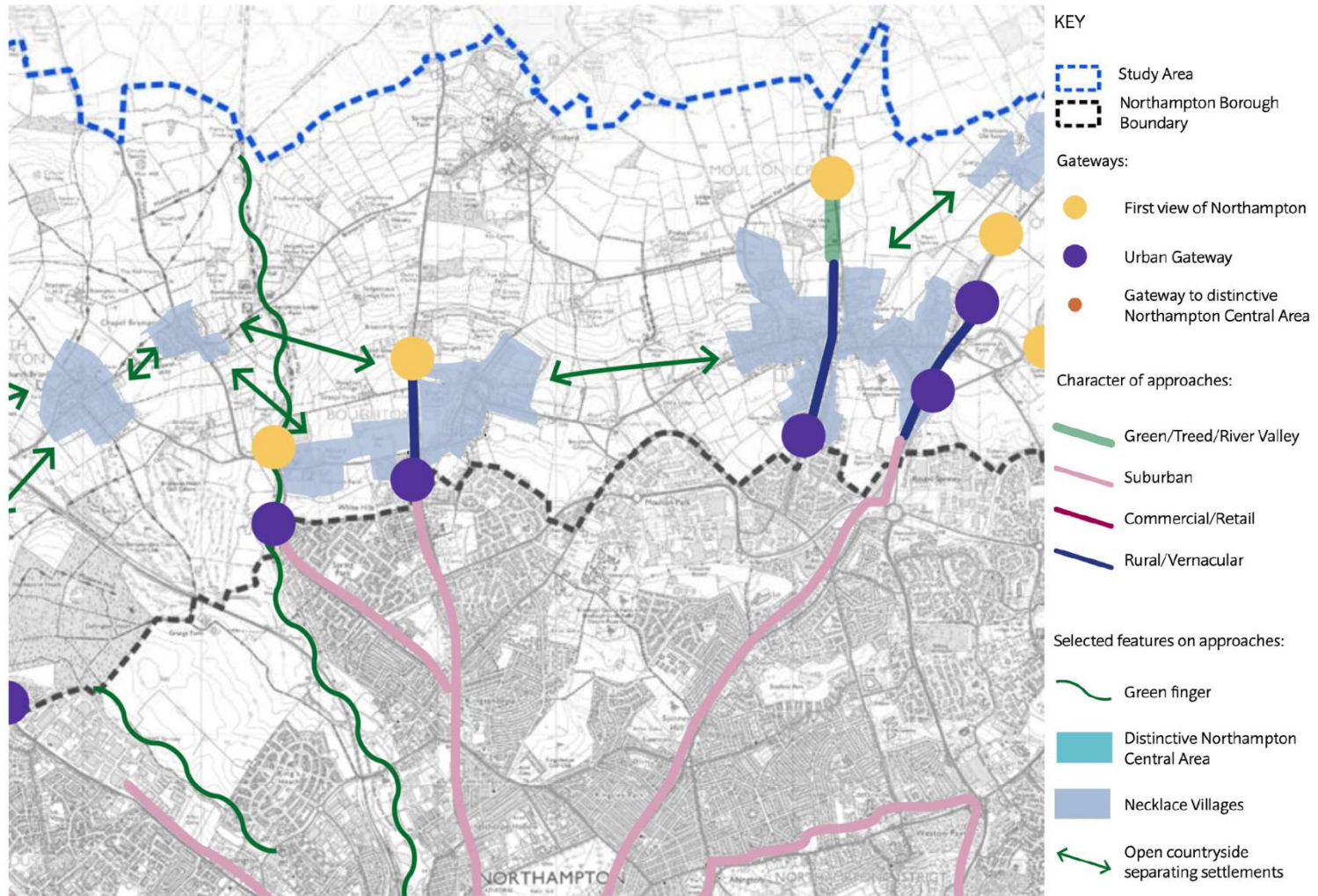
Appendix 4a – Bus Routes



Appendix 4b – Accessibility

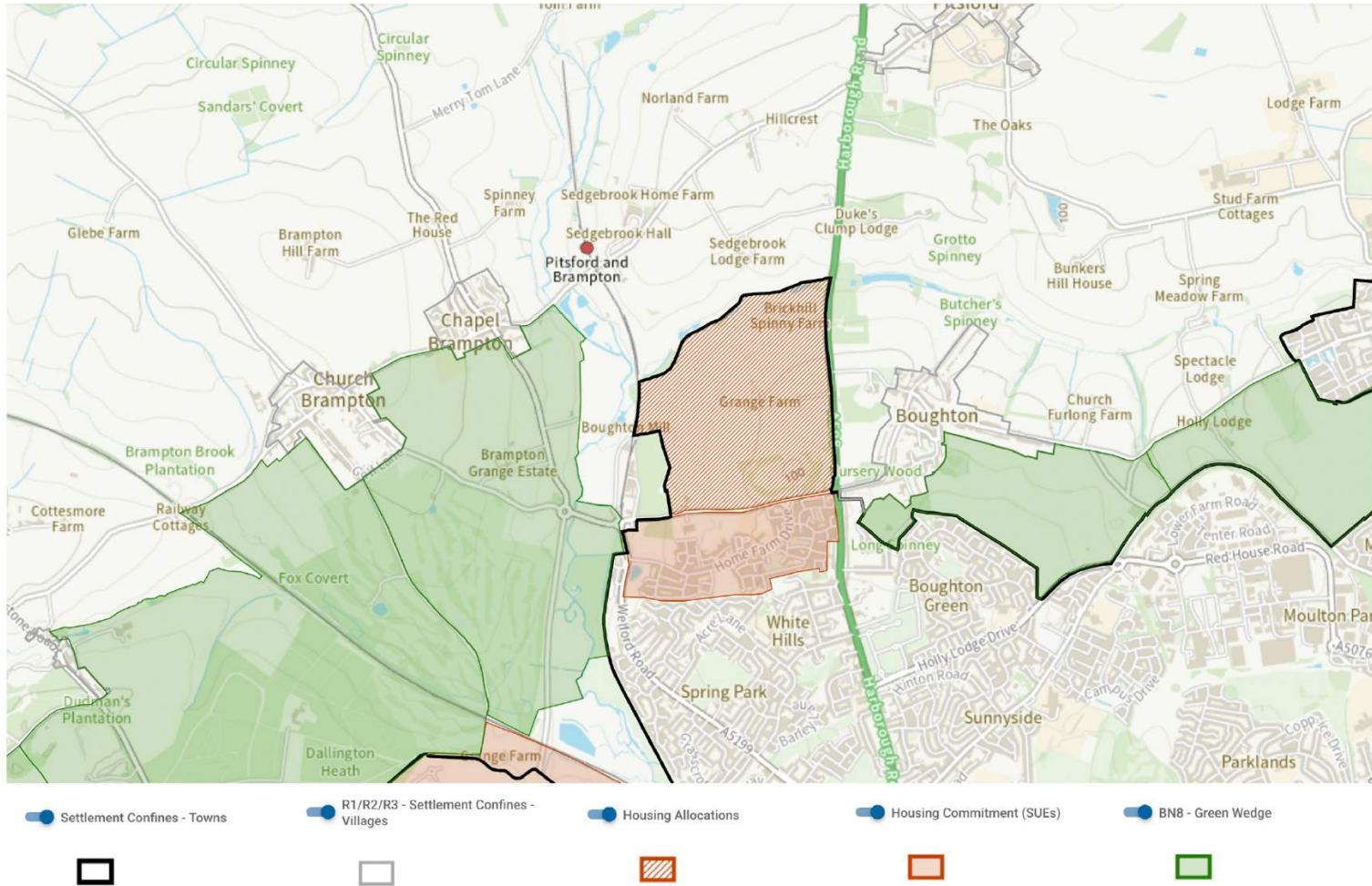


Appendix 5 – Urban Fringe Study Extract



Extract from Northampton Urban Fringe Landscape Character & Sensitivity Study (2018)

Appendix 6 – Settlement Boundaries, Site Allocations and Green Wedges



Regulation 18 Policies map Extract

