



**Desborough Town Council**  
Town Clerk: Graham Thomson  
High Street, Desborough, NN14 2QS  
01536 628816 clerk@desboroughtowncouncil.gov.uk

Mrs Christina Riley  
Development Management  
North Northamptonshire Council  
Bowling Green Road  
Kettering  
Northamptonshire  
NN15 7QX

2 June 2021

Dear Mrs Riley,

**NK/2021/0372 Desborough (land to south of), Rothwell Road, Sycamore Drive, Desborough**

### **Objections from Desborough Town Council**

Desborough Town Council wishes to object to the proposals as set out and for the reasons given below. I believe that you will have received a number of objections from residents. This Council supports the residents, the Police, Northamptonshire Highways, the “Protect the Ise Valley Campaign” group, and others in their objections. In giving this support, the Town Council has not sought to repeat all aspects of others’ objections but this letter should be taken as endorsing them.

The Council is not against development at all costs but any and all development should be sensitive to the location, respectful of the environment and history, in keeping with the local vernacular style, but most of all should be sustainable, safe, and designed to the highest standards for living. Unfortunately, this proposed development does not meet these basic requirements. The Town Council asks that the application be refused and resubmitted when and if it does meet the required standards in all respects, if at all.

The Town Council questions the need for this development given that the five year supply of development sites in the area has already been exceeded. On the grounds of over-provision in the town alone, the application should be refused.

Given the extremely sensitive nature of the site, the absence of any demonstrable need for the development, the obvious flood risks to both the development and the adjoining land with its important ecosystems, and the strength of public feeling against the plans, this application should be considered by Councillors in Committee rather than as any matter delegated to officers.

### Overall

It is particularly disappointing that the proposals do not meet even the basic required standards as outlined in the Local Highway Authority’s response and wholly endorsed by the Town Council although not repeated here (relating amongst other matters to: plots with no parking, properties too close to the public highway, shared drives serving too many plots, absence of visibility splays, private drives too short, unsatisfactory provision for visitor parking, insufficient parking for proposed properties in accordance with the Northamptonshire Parking Standards (2016), and so on). Consent should therefore be withheld and a new layout submitted for consideration.

The proposed development does not meet the “Secured by Design” standards and is therefore inviting crime and antisocial behaviour which will require future public investment

to resolve. The development does not meet Policy 8 of the North Northamptonshire Joint Core Strategy. These issues should be resolved at design stage and therefore consent should be withheld and a new layout submitted for consideration and approved.

No details of the lighting in the development have been seen. Consent should be withheld until details are provided.

The property and tenure mix is noted however, the mix on the plans does not comply with accepted standards (NPPF) in relation to making affordable properties blend into the development: the properties are in culs-de-sac leading to the real risk of ghettoism.

Footpaths and cycling provision meeting modern standards should be clear and provided not just within the site but linking to provision or planned provision where the site links to other roads.

The Town Council notes that the Kettering Site Specific Part 2 Local Plan (LP2) is currently under consideration by the Secretary of State and suggests that meaningful consideration of the application should be deferred pending the outcome of the review.

Consent should be withheld until the details referred to in this section are provided and approved.

### Roads

Desborough Town Council notes that Public Footpaths No. UC1, UC17, UC18, UC19, UC12 & UH27 cross the site and would expect any proposed changes to these footways to be sympathetically treated putting the needs of the footpath user, not the developer, at the centre of the proposals. Any proposed relocation of footways should be truly commodious for **walkers** and not just expedient for the developers. Details of any proposed changes should be submitted and agreed by the Town Council and local walkers before any consent is granted.

Desborough Town Council is concerned that the proposed internal road layout is ill-thought out, and contains potentially dangerous straight stretches of road. The road layout should be reconfigured to introduce curves and natural barriers to militate against potential inappropriate speeds.

The Town Council strenuously objects to the creation of an East West link road in this location. Such a road would attract traffic seeking a shortcut and having nothing to do with the development. The creation of a rat run would increase the road safety dangers and therefore render the currently proposed inappropriate layout even more unsafe.

Whilst there are clear needs and benefits from cycle and pedestrian access routes from the proposed development to established residential areas, these should flow through the entire ribbon of the site and meet equivalent provision outside the site.

Consent should be withheld until the details referred to in this section are provided and accepted, and the layout is amended to something more in keeping with modern design standards.

### Recreation and Play provision

There are few recreational facilities in the south of the town and the damage caused by the proposals to the landscape and the adjacent Tailby Meadow would remove one of the few remaining facilities.

The Town Council is concerned about the noise impact of conflicting uses on this ribbon site, especially the MUGA. The boundaries and buffers between houses and the play areas should be formalised in a revised layout plan.

There is insufficient detail about a number of issues including: the play provision, capacity for oversight from residences, boundaries, and measures for the prevention of vehicular access.

Consent should be withheld until the details referred to in this section are provided and approved.

#### Drainage, Flood Risk, and Environmental Issues

The Council is concerned at the potential for significant flood damage and water run-off being caused to the ecosystems, flora and fauna, the river, and adjacent land. It is particularly worrying to note that despite flood risk having been raised repeatedly by commenters and objectors throughout the life of applications on this site the Flood Risk Assessment and drawings still do not give sufficient information.

In the absence of this crucial information the application should be refused, and all further consents withheld until a detailed Drainage Strategy and an up-to-date Flood Risk Assessment are provided and accepted.

The Town Council has grave concerns that the development as proposed will fatally damage the views of the Ise Valley, its flora and fauna, its ecosystems, and the recreational uses to which it is put. It would appear that there is information missing from the Ecological Assessment and consent should be withheld until the details referred to in this section are provided and approved.

#### Joint Core Strategy

Turning to regional and subregional strategies, the Town Council notes that the proposals do not comply with the undermentioned Policies in the Joint Core Strategy:-

##### - **Policy 3. Landscape Character**

*“Development should be located and designed in a way that is sensitive to its landscape setting, retaining and, where possible, enhancing the distinctive qualities of the landscape character area which it would affect”.*

This proposed development is not sensitive to the setting and cannot enhance the landscape character of the area.

##### - **Policy 5. Water Resources, Environment and Flood Risk Management**

*“Development should contribute towards reducing the risk of flooding and to the protection and improvement of the quality of the water environment.”*

This is a regularly flooded site. An absence of empirical data relating to flooding does not equate to an absence of flooding, rather that the problems have not been officially recorded, notwithstanding ample anecdotal evidence of flooding. Flooding is well known in and around the development site and the development will exacerbate this.

##### - **Policy 8. North Northamptonshire Place Shaping Principles**

*“Make safe and pleasant streets and spaces by:*

*“i. Prioritising the needs of pedestrians, cyclists and public transport users and resisting developments that would prejudice highway safety”*

This development would significantly prejudice highway safety through the poor design features as outlined earlier. The Town Council is also extremely concerned for road safety at the junction with the B576, which routinely sees speeds in excess of 80mph near this location (in the 30 mph zone) and currently sees at least one vehicle a week travelling in excess of 100 mph (speed data for the B576 in this vicinity are available on the Town Council’s website ([desboroughtowncouncil.gov.uk](http://desboroughtowncouncil.gov.uk) > Documents > Vehicle Speeds in Desborough).

*“Ensure quality of life and safer and healthier communities by:*

*“i. Protecting amenity by not resulting in an unacceptable impact on the amenities of future occupiers, neighbouring properties or the wider area, by reason of noise, vibration, smell, light or other pollution, loss of light or overlooking”*

On any view, this proposal will erode the quality of life of those who live near to, pass by, use, or view this wonderful community asset. It will clearly have a negative impact on the mental and physical wellbeing of those who seek sanctuary and calm.

*“ii. Preventing both new and existing development from contributing to or being adversely affected by unacceptable levels of soil, air, light, water or noise pollution or land instability”*

Through flooding, damage to the ecosystems, and run-off from the development, this development will cause unacceptable adverse effects.

*“iii. Incorporate ecologically sensitive design and features for biodiversity to deliver ‘Biodiversity by Design’”*

This proposal is not ecologically sensitive and will cause irreparable damage to the Ise Valley’s ecosystems.

*“iv. Seeking to design out antisocial behaviour and crime and reduce the fear of crime through the creation of safe environments that benefit from natural surveillance, defensible spaces and other security measures having regard to the principles of the ‘Secured by Design’;”*

As outlined earlier, this development fails to take account of, and does not meet, the standards and principles of “Secured by Design”.

- **Policy 11. The Network of Urban and Rural Areas**

*“1(b) The Market Towns will provide a strong service role for their local communities and surrounding rural areas with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town.”*

As outlined earlier, this development would take the number of dwellings approved far in excess of the required five years’ supply.

- **Policy 19. The Delivery of Green Infrastructure**

*“Contributing towards the enhancement or ongoing management of local green infrastructure corridors by prioritising green infrastructure investment in areas where net gains can be made to the range of functions, particularly those that improve access between the towns and their surrounding countryside and remedy local deficiencies in open space provision and quality”*

This development on the historic and priceless Ise Valley will contribute to or cause the destruction of the local green infrastructure rather than contribute to its enhancement. As such, and for this reason alone, the proposals must be rejected.

- **Policy 20. The Nene and Ise Valleys**

*“The Nene and Ise Valleys will be priorities for investment in green infrastructure to strengthen biodiversity and landscape character, support a prosperous local economy, provide leisure and recreational opportunities and support the revitalisation of towns and the protection and enhancement of their surrounding countryside.”*

This proposed development does not contribute towards “investment in green infrastructure to strengthen biodiversity and landscape” but it would clearly destroy it. Similarly, it will remove rather than “provide leisure and recreational opportunities” and reverses many years’ work towards “the protection and enhancement of [the] surrounding countryside”.

For these reasons, the application should be refused.

### National Planning Policy Framework

The proposals do not comply with the following policies:-

- **Policy 2. Achieving sustainable development:**

*“the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”.*

For the reasons given relating to the damage to the ecosystems in the vicinity this development can never comply with the requirements of this policy.

The policy defines the three overarching and interdependent objectives as economy (strong, responsive and competitive economy); social (to support strong, vibrant and healthy communities); environmental (protecting and enhancing our natural, built and historic environment, and improve biodiversity). Self-evidently the proposal will not contribute to a) the social wellbeing (health) of the communities given that it is removing access to the benefits of the countryside and wildlife; and, b) the environment since it will destroy, not enhance, our natural and historic environment, and will do nothing to improve biodiversity, quite the reverse.

- **Policy 8. Promoting healthy and safe communities**

*“Planning policies and decisions should aim to achieve healthy, inclusive and safe places” which:*

*“are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion”.*

As has been shown, the proposals do not meet basic “Secured by Design” standards and are in other respects likely to encourage antisocial behaviour and crime.

*“enable and support healthy lifestyles” ... “for example through the provision of safe and accessible green infrastructure”.*

Again, the proposals REMOVE access to safe and accessible green infrastructure.

*“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should” ... “guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”.*

The Town Council is firmly of the view that the loss of this part of the highly valued valley would indeed reduce if not completely remove the community’s ability to meet its day-to-day wellbeing needs.

*“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

*“a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*

*“b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location”*

It is absurd in the extreme to suggest that the land in question has been or could be shown to be surplus to requirements. Clearly, the proposed development will not be replacing the valuable green space with anything equivalent, let alone better.

*“Planning policies and decisions should protect and enhance public rights of way”*

This proposal will adversely impact Public Footpaths Numbered UC1, UC17, UC18, UC19, UC12, and UH27.

- **Policy 12. Achieving well-designed places**

*“Permission should be refused for development of poor design”.*

This proposal is clearly of poor design (even the Local Highway Authority’s response criticises the design) and the application should therefore be refused.

- **Policy 14. Meeting the challenge of climate change, flooding and coastal change**

*“New development should be planned for in ways that:*

*“a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure”*

The Town Council is convinced that the flood risks in this area are being underestimated. An absence of empirical data relating to flooding does not equate to an absence of flooding, rather that the problems have not been officially recorded, notwithstanding ample anecdotal evidence.

*“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*

Again, the Town Council contends that this development is not necessary (by virtue of consents elsewhere giving more than five year’s supply) and as it is in an area known for flooding or likely to flood (now and in the future) the proposal should be refused. Clearly, the water run-off from the development will find its way to land and water courses outside the development area leading to a loss of flora and fauna, and irreparable damage to the valley and the river Ise.

- **Policy 15. Conserving and enhancing the natural environment**

*“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*“a) protecting and enhancing valued landscapes, sites of biodiversity or geological value”*

The Town Council is of the view that the application should be refused in line with this policy on the grounds that to give consent would not contribute to and enhance the natural and local environment (quite the reverse) and would destroy rather than protect and enhance this valued landscape and site of biodiversity value.

- **Policy 16. Conserving and enhancing the historic environment**

*“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment”*

This development does not protect or conserve the natural historic vista of the Ise Valley.

For these reasons, the application should be refused.

Construction traffic

If any consent is granted, it should be conditional upon:-

- construction traffic using a new access from the B576 for the whole construction;
- through traffic between the B576 and Rushton Road be prevented for ANY and ALL vehicles during the construction and occupation phases by physical barriers;

- any temporary access between the B576 and Rushton Road created during construction be completely and effectively closed following construction of the properties to be accessed from Sycamore Drive.
- Desborough has suffered from the construction traffic for the development at Rothwell North. However, approving **and enforcing** one specific route for construction traffic has drastically reduced the incidence of construction traffic causing damage, noise, and disruption along unapproved routes. Any consent should restrict traffic to the least intrusive route which should be enforced by a condition requiring ANPR monitoring and reporting non-compliance to the Town Council similar to the scheme at Rothwell North, with a legally binding system of fines for construction-related vehicles not following the approved route into and out of the site.
- A detailed construction management plan should be provided before approving the reserved matters (including details of construction traffic routing, construction access, hours of work, wheel washing details).

Yours sincerely,

Graham Thomson  
Town Clerk