

East Northamptonshire Council

Local Plan Part 2 Additional  
Sites Consultation (Rushden)

10 October 2020 until 16 November 2020



**November 2020**

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## **Appendix 1 – Illustrative Framework of Land at Slaters Lodge, Rushden East**

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# 1 INTRODUCTION

## 1.1 Context

1.1.1 These representations have been prepared in response to the Local Plan Part 2 consultation, which provides the opportunity to comment on proposals for:

- Land east of A6/Bedford Road (to the south east of Rushden) – A potential alternative to Rushden Lakes West, to ensure delivery of an additional 450 dwellings; and,
- Rushden East SUE – the inclusion of a development boundary and Masterplan Framework Document for the Rushden East SUE within the Local Plan Part 2.

1.1.2 These documents have been published by East Northamptonshire Council (ENC) for public consultation from 10 October 2020 until 16 November 2020 and form the latest stage in the preparation of the East Northamptonshire Local Plan Part 2.

1.1.3 The consultation is being undertaken following the outcome of a previous consultation held in February/March 2020, which focussed on the proposed allocation of an additional housing site at Rushden Lakes West and a Draft Masterplan Framework for the Rushden East Sustainable Urban Extension. The representations made by Gladman in March 2020 in respect of the Rushden East SUE Masterplan Framework Document (MFD) remain valid in response to this consultation and should be read alongside this submission.

## 1.2 Land at Slaters Lodge, Rushden East

1.2.1 As the Council is aware, Gladman are the promoters of Land at Slater's Lodge (see figure 1 at the end of Section 1.2 below), which falls within the broad area of search for Rushden East SUE as defined through Policy 33 (Rushden East Sustainable Urban Extension) of the North Northamptonshire Joint Core Strategy 2011-2031 (NNJCS). The broad area of the Rushden East SUE, which extends around the east of Rushden and the Slater's Lodge land appears as four field parcels that provide a total site area of approximately 47ha. The north of the site is bound by Newton Road. The remaining boundaries currently adjoin open fields which to the north west and south also form part of the SUE broad area of search.

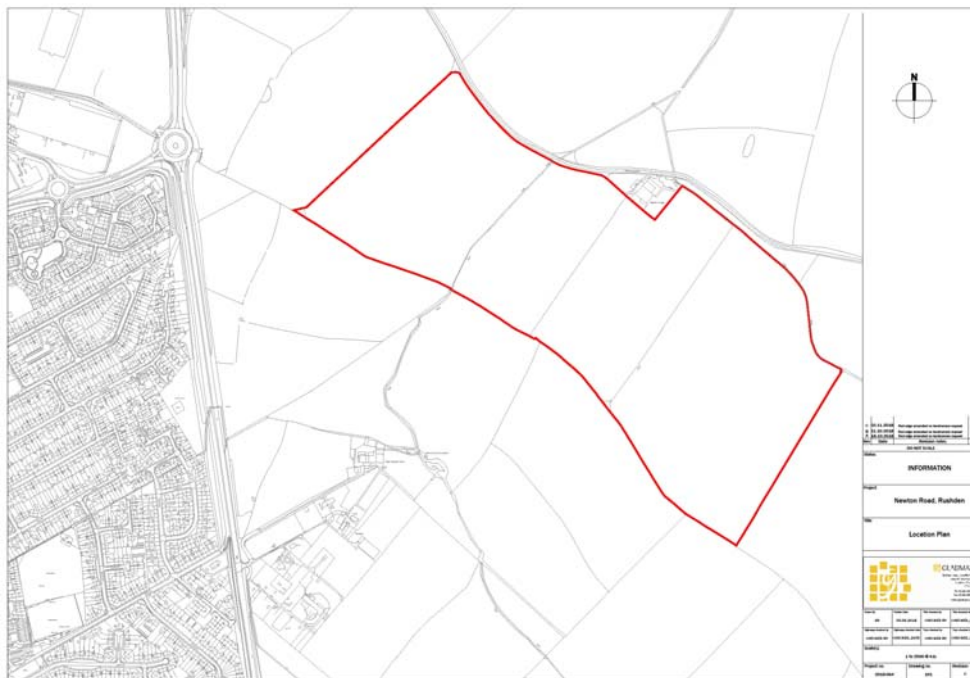
1.2.2 Policy 28 of the NNJCS sets out that local planning authorities will work proactively with applicants to bring forward sites to meet identified housing requirements in line with the spatial strategy. In this regard, Land at Slater's Lodge forms part of a broad location of growth. Gladman remain committed to working with the Council to ensure that the site can be brought

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forward as an integral part of the wider comprehensive proposals for the SUE and in doing so contribute towards meeting the development needs of the area over the plan period and beyond.

- 1.2.3 Paragraph 10.31 of the NNJCS indicates that the Council will work closely with the site promoters within the broad area to prepare the Masterplan for the Rushden East SUE, in consultation with the local community and other stakeholders. As a site promoter within the SUE's 'broad area of search', the Council should therefore positively and proactively engage with Gladman in the preparation of the final version of the Masterplan Framework Document and the associated Local Plan Part 2 policy. It is noted from the Masterplan Framework Document<sup>1</sup> that the Council has engaged with a developer consortium to jointly prepare reports associated with the SUE, but has not engaged with Gladman as part of this process. Gladman are of the view that this can however be rectified prior to the Draft Masterplan and Local Plan Part 2 Policy being finalised to agree common ground and ensure that its proposals are able to support the progression and positive determination of planning applications as intended by NNJCS Policy 33. We would therefore welcome the opportunity to liaise with the Council and other interested parties to agree common ground regarding the policy approach to the Slater's Lodge Land through your process of finalising the SUE Masterplan and associated Local Plan Part 2 Policy.

**Figure 1: Land at Slaters Lodge, Rushden East**



<sup>1</sup> See Paragraph 2.4.5 of the Masterplan Framework Document

## 2 LAND EAST OF A6/BEDFORD ROAD (TO THE SOUTH EAST OF RUSHDEN) – A POTENTIAL ALTERNATIVE TO RUSHDEN LAKES WEST

- 2.1.1 With regard to Rushden Lakes West, it is understood that representations have been made to the Council by Natural England and the Local Wildlife Trust regarding the potential impact of the proposed allocation on the Upper Nene Gravel Pits Special Protection Area (SPA). As a result, the Council is liaising with those consultees to determine whether it is possible to overcome the matters raised. However, the Council has also now chosen to identify a further site option as a potential alternative allocation to Rushden Lakes West at the A6/Bedford Road to the east of Rushden. At this stage, it is unclear as to which of the two sites might be preferred by the Council for allocation in the Part 2 Local Plan and it is understood that this will be determined in due course as part of the Council's process of finalising the Local Plan Part 2, prior to its publication under Regulation 19 in 2021. Whilst it is noted that the NNJCS affords some flexibility regarding the identification and allocation of smaller greenfield sites at the growth towns through individual Part 2 Local Plans<sup>2</sup>, it would appear that both of the opportunities that have been identified could be considered to be new strategic directions for growth that would be better placed forming part of a review of the wider NNJCS. In this regard, Gladman reserves its position to comment further on the proposed allocation of additional sites at Rushden through future consultations associated with the Local Plan Part 2.
- 2.1.2 Notwithstanding the Council's evolving position on the potential allocation of alternative sites, it remains central to the implementation of the NNJCS that a Masterplan is put in place that maximises the delivery potential of the most sustainable location for growth at Rushden East (as identified through NNJCS Policy 33). The preferred approach should ensure that this enables the delivery of land within the broad area that has been identified to support the housing and employment development needs of the area. This position was set out in response to the March 2020 consultation and continues to be relevant in the context of the Council's latest proposals. Our specific comments on the Council's latest proposals for the Rushden East SUE are set out in Section 3 below.

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<sup>2</sup> North Northamptonshire Joint Core Strategy, Table 1: Spatial Roles, p.76 and Policy 11, p.78)

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### 3 RUSHDEN EAST SUE - THE INCLUSION OF A DEVELOPMENT BOUNDARY AND MASTERPLAN FRAMEWORK DOCUMENT FOR THE RUSHDEN EAST SUE WITHIN THE LOCAL PLAN PART 2.

- 3.1.1 The preparation of a Masterplan for the Rushden East SUE remains an on-going process and this consultation proposes the inclusion of a site specific policy within the Local Plan Part 2. The decision to include an additional policy relating to the Rushden East SUE within the Local Part 2 is welcomed and provides an opportunity for the Council to robustly test all reasonable options available for the delivery of the site in a transparent manner, providing clear justification for the preferred way forward.
- 3.1.2 During the previous consultation, Gladman sought clarification on the Council's process of finalising the Masterplan Framework Document for the Rushden East SUE and raised a number of matters relating to the emerging proposals for the site, including the process of determining the development boundary and the option to expand the proposals to show the logical integration of the Slater's Lodge Land. In doing so, the Masterplan would support an approach that enables the comprehensive delivery of development within the broad area that has been identified for the SUE through the NNJCS. A number of suggested changes to the Masterplan were submitted to demonstrate how this could be achieved and this is provided again at Appendix 1 of this submission. Gladman continues to promote those proposed amendments to the Council and would welcome the opportunity to discuss this issue further with the Council in advance of the progression of the Local Plan Part 2 to the Regulation 19 stage with a view to pro-actively agreeing common ground regarding the way forward for our land interests within the SUE's broad area.
- 3.1.3 It is noted that there are no changes proposed to the previous SUE site boundary within the policy extract or the Draft Masterplan Framework Document from that published at the beginning of 2020. Therefore, our previous consultation response of March 2020 remains relevant in response to this consultation and should be read alongside this submission.
- 3.1.4 Whilst the decision to include the Rushden East SUE within the emerging policies of the Local Plan Part 2 is welcomed, in our view, the consultation material lacks the detail that is required to justify the policy choices that the 'Draft Policy Extract and Supporting Text' propose, with particular reference to the SUE boundary at Figure 1. Furthermore, in its current form, the
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proposed policy does not include a number of important planning application requirements, including some of those set out within the Masterplan Framework Document, which represent areas of policy direction that should naturally feature within policy wording relating to the development of the site, for example:

- Specific requirements for employment development
- Specific infrastructure requirements
- Phasing requirements
- Heritage considerations
- The need for planning applications within the SUE to demonstrate that they do not prejudice further growth.

3.1.5 It remains of key importance to the delivery of housing and employment land over the plan period (and beyond) that the Council moves forward with Local Plan Part 2 policies and a Masterplan Framework for the SUE in a manner that will maximise the site's delivery potential. Gladman therefore seek a commitment through the wording of planning policies that ensures that:

- Access can be secured to the Slater's Lodge Land through the Council's Masterplan;
- The Slater's Lodge land can be fully integrated within the masterplan proposals; and,
- The associated planning application requirements enable the timely and logical delivery of development on the Slaters Lodge land.

3.1.6 Clarification is also sought on the manner in which the masterplan proposals will maximise employment and commercial aspects of the SUE to ensure that the policy approach is responsive to the changing needs of business and provides the facilities that the area needs to support the growth of a sustainable community from the earliest stages of the site's development.

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## 4 CONCLUSIONS

4.1.1 Gladman welcomes the opportunity that has been provided by ENC to comment on the following proposals:

- Land east of A6/Bedford Road (to the south east of Rushden) – A potential alternative to Rushden Lakes West, to ensure delivery of an additional 450 dwellings; and,
- Rushden East SUE – the inclusion of a development boundary and Masterplan Framework Document for the Rushden East SUE within the Local Plan Part 2.

4.1.2 Gladman are the promoters of Land at Slater's Lodge, Rushden East, which is located in the broad location of the Rushden East SUE identified within Policy 33 of the NNJCS. It is important that the process of preparing and finalising the Rushden East SUE Masterplan is undertaken with the full engagement of all those with a land interest within the broad location for growth. We naturally remain disappointed that a draft masterplan and local policy is being progressed that seeks to define a boundary for the development that would exclude the Slater's Lodge Land in its entirety, despite forming an integral part of the broad area that is identified within the NNJCS.

4.1.3 With regard to the Council's proposed allocation of either Land at Rushden Lakes West or Land East of the A6/Bedford Road, these proposals appear to be of a strategic scale. The potential allocation of additional sites through the Part 2 Local Plan has been identified in response to the Council identifying a possible shortfall in housing delivery over the remainder of the plan period. Gladman reserves its position to comment further on how the Council intends to meet its overall housing requirements through any future consultations on the emerging Part 2 Local Plan. Gladman are of the view that the Rushden East Masterplan provides the potential to introduce a delivery strategy that will assist in the timely development of both proposed neighbourhoods to the north and south of the SUE. Such an approach would include Land at Slater's Lodge within the Masterplan proposals in order to support the delivery of homes within the SUE during the plan period and beyond. Whilst it continues to be our view that the Slaters Lodge land can be sensibly integrated within the SUE boundary at this stage, as a stakeholder in the SUE's broad area we would welcome the opportunity to liaise further with the Council with regard to its emerging policy approach with a view to agreeing common ground.

4.1.4 We trust that the comments contained in these representations are informative and that the issues raised are taken into account and fully embraced by the Council through its process of

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finalising the Rushden East SUE Masterplan Framework Document and in preparing its Local Plan Part 2. We look forward to engaging with the Council further in relation to our land interests at Rushden and would welcome the opportunity for pro-active engagement with a view to exploring common ground relating to the Masterplan and the final version of the associated policy to be included in the Council's Local Plan Part 2.

# APPENDIX 1: RUSHDEN EAST DEVELOPMENT FRAMEWORK INTEGRATING LAND AT SLATER'S LODGE