



Northamptonshire County Council

Planning Policy
ENC Local Plan Part 2
East Northamptonshire Council
Cedar Drive
Thrapston
NN14 4LZ

Please ask for: [REDACTED]
Tel: [REDACTED]
Our ref: ENC/LocalPlanPart2Draft/Cons2
Your ref:
Date: 6th November 2020

Dear Sir,

RE: Draft East Northamptonshire Local Plan Part 2 – Additional Sites Consultation (October 2020)

Introduction

Northamptonshire County Council (the county council) welcomes the opportunity to comment Draft East Northamptonshire Local Plan Part 2 - Additional Sites consultation (October 2020), on behalf of its Education, Libraries and Broadband service areas, and on behalf of Northamptonshire Fire & Rescue Service.

This response builds on comments submitted previously on the Draft Plan (dated 13 December 2018, and 6th March 2020), and relates specifically to the proposed inclusion of additional site allocations as follows:

- Land east of A6 / Bedford Road (to the south east of Rushden)
- Rushden East SUE (incorporation of the masterplan framework document within the Plan)

These sites are addressed in turn below:

Land east of the A6/Bedford Road (to the south east of Rushden)

The Consultation proposes additional text be inserted into the Draft Plan in relation to Section 8.0 (Housing Delivery), setting out revised trajectories for housing completions, with both the Rushden East and the Irthlingborough West SUEs trajectories experiencing delays to implementation as a result of deliverability / viability issues. The revised trajectories *“equates to residual shortfalls of 323 dwellings and 306 dwellings, for*



Irthlingborough and Rushden respectively". When considered in totality, there is therefore a shortfall in excess of 600 dwellings across the two areas.

A number of options are stated to have been considered to accommodate the growth for Irthlingborough and Rushden. It is noted that of five potential locations initially considered, four have been discounted with the 'preferred' option being a mixed use development to the west of Rushden Lakes, with capacity for 400-450 dwellings (proposed new Policy EN27). However, an objection to this site submitted by Natural England has necessitated further review of potential viable alternatives, the result of which is the proposed inclusion of the Rushden South East (Land east of the A6 / Bedford Road) allocation.

Education

From an Education perspective, the proposed Rushden South East site raises a number of concerns in relation to the impact on existing infrastructure and ability of the site to be sustainable.

A development of 450 dwellings would be expected to generate in the region of c.145 Early Years, c.145 Primary and c.110 Secondary & Sixth-form pupils. It is not currently proposed that any on-site Education facility be part of the development, therefore off-site infrastructure will be expected to accommodate the pupil yields generated.

The location of the proposed site is also separated from Rushden and its amenities by the A6, with no Early Years, Primary or Secondary Education provision considered to be within safe walking distance of the development. It would therefore be necessary for all pupils to travel to nursery / pre-school or school by car and/or bus, which is in conflict with the objectives of the county council to reduce reliance on vehicular travel and reduce home to school transport wherever possible. Furthermore, existing and projected capacity in the vicinity of the proposed site is extremely limited, with the cumulative impact of existing permitted and planned-for development expected to take up any existing capacity at both primary and secondary level.

New and expanded schools are already being planned to accommodate the SUEs coming forward through the JCS, as well as growth resulting from basic need demand, therefore the impact on existing schools will need to be considered carefully when considering additional housing development over and above this.

Furthermore, it may not always be possible for schools within the vicinity to accommodate additional pupils, or to expand on their existing sites; some of those schools closest to the development are situated in constrained, residential areas with limited scope for additional capacity to be provided through expansion due to lack of available space.

There is currently therefore a lack of safe, walkable access to any suitable Education provision in the area, and a lack of capacity within local schools to accommodate any pupil yield from a development of this scale in this proposed location.

Any such development if approved would therefore be required to mitigate its impact on existing infrastructure through provision of Section 106 developer contributions (in accordance with the county council's adopted Planning Obligations Framework and Strategy), towards improvement enhancement and expansion of facilities and capacity to meet the needs arising from the new residents of the development.

The county council takes a strategic approach to the planning of new school places. In the event that additional capacity is required to be provided ahead of this development coming forward in order to accommodate wider cumulative impacts in the surrounding area, whilst also taking into account the likely long-term yield from this and other allocated sites across the plan period, then developer contributions will continue to be required in order to retrospectively contribute to the provision of necessary infrastructure, supporting the forward-funding of infrastructure through repayment at a later date as development progresses. The draft Plan should be explicit in supporting allocation of developer contributions in this way, reducing the need for the local authorities to finance delivery of infrastructure required as a result of growth.

The county council would welcome discussion with the promoter / developer of the site at the earliest possible opportunity to discuss these requirements in further detail.

Libraries

In accordance with our previous response to the consultation on the Draft Local Plan Part 2, it is noted that Library Infrastructure is identified (and protected) by Policy 7 of the Joint Core Strategy as an identified community facility. The County Council will assess the impact of any new housing development at this proposed location on existing infrastructure, facilities and services delivered through local Libraries, and will secure Section 106 developer contributions, where appropriate, to help mitigate the impact of new housing, improving capacity and the range of services delivered in line with the County Council's priorities for the Library service, to meet the needs of the growing community.

Fire & Rescue

New developments and associated infrastructure within East Northamptonshire equates to an increase in visitors as well as traffic movements. This will inevitably lead to an increase in the spread of fire risk, which places additional demands on Fire and Rescue Service resources to ensure safe places are maintained, consistent with national Government expectations and guidance.

Northamptonshire Fire and Rescue Service sets out its criteria for responding to incidents within its Standards of Operational Response (SOR). The standards outline how the Service will respond to different incident types which fall within its statutory responsibilities under the Fire and Rescue Services Act 2004.

Development coming forward at the proposed site should be assessed to ensure that sufficient infrastructure is in place to accommodate the increased demand for services. This may result in a requirement for Section 106 developer contributions to be secured, or for appropriate planning conditions to be applied to permissions granted, to ensure that adequate infrastructure is in place to enable fire, should it occur, to be effectively tackled.

Broadband

The vision for the county is to be at the leading edge of the global digital economy. To meet this challenge we've set an ambitious target of 40% full fibre connectivity across the county by December 2023. To deliver on this, it is essential that new developments (both housing and commercial) are served by high quality full fibre networks. Access to the speeds, 1 gbps or faster, delivered by this technology will bring a multitude of opportunities, savings and benefits. It also adds value to the development and is a major selling point for potential residents and occupiers.

In order for the commercial communications market to be able to deploy to these new build areas, measures must be introduced at the earliest opportunity. This will provide the required specification to enable full fibre connectivity for all new developments. To help developers, some fibre based broadband network providers such as Openreach and Virgin Media have dedicated online portals which provide assessment tools and technical help. There are also a variety of other suppliers operating in the area such as: Gigaclear, CityFibre and Glide. Further details of each of these as well as others can be found at the below web address:

<http://www.superfastnorthamptonshire.net/how-we-are-delivering/Pages/telecoms-providers.aspx>

Early registration of development sites is key to making sure the people moving into your developments get a full fibre broadband service when they move in. More information can be found in the links below:

BT Openreach: <https://www.ournetwork.openreach.co.uk/property-development.aspx>

Virgin Media: <http://www.virginmedia.com/lightning/network-expansion/property-developers>

It is advised that ducting works are carried out in co-operation with the installations of standard utility works. Any works carried out should be compliant with the Manual of Contract Documents for Highway Works- specifically Volume 1 Specification Series 500 Drainage and Ducts, and Volume 3 Highway Construction Details Section 1 – I Series Underground Cable Ducts. These documents can be found at:

<http://www.standardsforhighways.co.uk/ha/standards/mchw/index.htm>

For further information on the project please visit www.superfastnorthamptonshire.net
email us at: [REDACTED]

Rushden East Sustainable Urban Extension

The county council welcomes the inclusion of additional site specific detail in the Draft Plan with regards to the Rushden East SUE, however recognises that further work will be required on specific matters to ensure the SUE is deliverable and can effectively mitigate its impact on local infrastructure.

It is understood that whilst the site allocation sets out capacity to accommodate at least 2,500 dwellings, there is potential for additional development beyond this figure in the longer term. Any such additional development will need to be assessed for its impact on local infrastructure in accordance with the policies of the JCS and in accordance with the county council's adopted Planning Obligations Framework.

The county council has been engaged with the promoters of the SUE and with East Northamptonshire Council over a number of years to inform the infrastructure requirements in relation to the Sustainable Urban Extension, particularly in relation to the Policy requirements, and this response therefore follows on from those discussions.

Education

The Rushden East MFD indicatively identifies within the SUE sites for two primary schools and a secondary school as required by the JCS through Policy 33. The proposed locations of these are considered to be generally appropriate in terms of meeting the requirements of local residents, however further work will need to be carried out – particularly in relation to the proposed Secondary School site – to fully understand any pre-existing conditions which may affect deliverability, for example site specific constraints, topography, ground conditions etc.

The Draft Plan indicates that by 2031, the Rushden East SUE is expected to have delivered up to 1,200 dwellings of the overall allocation. It will be important for further discussions to be had with regards to the phasing and delivery of the Schools to ensure that sufficient capacity can be provided at the appropriate time.

Libraries

Please refer to the information provided above.

Fire & Rescue

Please refer to the information provided above and the Standard Operational Response (SOR) guidance provided by Northamptonshire Fire & Rescue via their website for further details.

Broadband

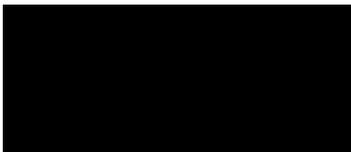
Please refer to the information provided above.

Concluding comments

Please note that the guidance contained herein may be subject to change as a result of changes to planning policy and guidance at national and / or local level as appropriate, or as a result of any amendments to the scale and/or mix of development proposed, and therefore continued consultation with the County Council is recommended to ensure that the latest available information is taken into consideration. We would also request that in the event of any viability considerations being raised with regards to the level of s106 obligations requested that the County Council is engaged in discussions at the earliest opportunity to seek to respond to any concerns.

Please don't hesitate to contact me should you have any queries or require any additional information or clarifications.

Yours sincerely,



Senior Project Manager – Development Management
Northamptonshire County Council
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