



RUSHDEN TOWN COUNCIL

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16th November 2020

East Northamptonshire Council
Cedar Drive
Thrapston
Northants

Dear Sirs

Local Plan Part 2 Additional Sites Consultation (Rushden), October 2020

1. INTRODUCTION

- 1.1 This consultation response is made on behalf of Rushden Town Council and relates specifically to the additional site allocation proposed as part of the Emerging Local Plan Part 2 – Rushden South East. It also deals with the proposed allocation of Rushden Lakes West.
- 1.2 Rushden Town Council (RTC) wish to outline their **support** to the additional site allocation of Rushden South East (Land East of the A6/Bedford Road) as proposed in the Emerging Local Plan Part 2.
- 1.3 Rushden Town Council also wish to **object** to the continued inclusion of Rushden Lakes West as an additional site allocation.
- 1.4 It is recognised that East Northamptonshire Council (ENC) are required to find additional sites for housing as part of the Emerging Local Plan Part 2 (ELP). Within the October 2020 consultation document – Policy Extract and Supporting Text, ENC sets out that the requirement for additional housing sites is primarily caused by the delays in the delivery of two specific strategic sites – Irthlingborough West and Rushden East.
- 1.5 ENC have identified that there remains an outstanding requirement of 629 dwellings across the three towns of Rushden, Irthlingborough and Higham Ferrers as at 1 April 2019. This is an increase in 50 dwellings since the March 2020 Additional Sites Consultation due to a reduction in dwelling capacity at Manor Park.
- 1.6 Offsetting this figure from the Higham Ferrers housing figures which currently exceed the Joint Core Strategy (JCS) requirement by 244 dwellings, results in a residual requirement for 385 dwellings across the three town areas.

2. CONTEXT

- 2.1 Further additional sites have had to be reviewed by ENC following significant objections to the proposed Rushden Lakes West site. The objections from Natural

England and the Wildlife Trust have resulted in the need for ENC to undertake additional surveys and work to assess the potential impact of the Rushden Lakes West site on the Upper Nene Gravel Pits Special Protection Area (SPA), raising an issue of the deliverability of the site and affecting the progression of the ELP.

- 2.2 As a result of the significant issues raised over the site, ENC have proposed to allocate a site at Rushden South East; Land East of the A6/Bedford Road as a viable alternative.

3. PROPOSED ALLOCATION: RUSHDEN SOUTH EAST

- 3.1 This proposed allocation is fully supported by Rushden Town Council. The location is appropriate as it is adjacent to the growth Town (Rushden) and its surrounding services. Although the site is separated from the town by the A6/Bedford Road, opportunities are available to effectively and safely link the site to the existing town. A footpath to the site already exists that runs behind Rushden Primary Academy and across the A6 into the site. This access can be upgraded, whilst additional access can be facilitated at the A6/A5028 Roundabout; at this section, the A6 is a single carriageway and crossings can be managed at grade.
- 3.2 The Rushden Neighbourhood Plan (RNP) adopted June 2018 does not deal with this site as it is deemed to be outside of the settlement boundary. It is acknowledged that an additional site will need to be provided outside of this boundary. Rushden South East would help facilitate the relocation of the rugby pitches at Manor Park and 'infill' land between the relocation site and the Town.
- 3.3 Within the RNP, the current Rushden & Higham Rugby Club on Bedford Road is allocated for housing (Policy H2.D). The development of this allocated site is contingent upon the relocation of the existing playing pitches and facilities to a suitable alternative site in accordance with RNP Policies CL5 (Provision of new outdoor sports and recreation facilities) and CL6 (Existing community facilities).
- 3.4 An appropriate site for the relocation of the sports ground has been found and an application has been submitted (20/01174/FUL). Access for this would be taken off the A6/Bedford Road Roundabout.
- 3.5 Rushden South East would create a continued built form, helping link the Town to the sports facilities and providing active frontages to public footpaths.
- 3.6 The development of Rushden South East would also help link The John White Golf Club and existing dwellings on Bedford Road opposite the Golf Club to the Town.
- 3.7 The draft policy wording is supported. Suggested improvements to the policy text could include aspirations to expand the Greenway, with the opportunity to provide a continuous green infrastructure link from this development, though Rushden East SUE and to the existing Greenway at John Clarke Way.
- 3.8 RTC stress that they would like to be consulted regarding emerging changes to the section of the ELP that arise from this consultation.

4. EXTENT OF PROPOSED SITE ALLOCATION(S)

- 4.1 Whilst the allocation of Rushden South East is supported, this should be a replacement allocation for Rushden Lakes West.

- 4.2 It is understood that the Planning Committee met on 21 September 2020 and resolved to;
- “approve the land to the south of Bedford Road, Rushden as an alternative viable site in parallel with the potential site allocation at Rushden Lakes West”.*
- 4.3 The current consultation page does not make it clear that the two sites are proposed to be allocated in parallel, resulting in potentially two separate allocations in the ELP.
- 4.4 Rushden Town Council strongly object to two separate allocations being proposed. If both sites were to be allocated, Rushden would be heavily exceeding the residual requirement and would mean that the Town could see large housing development sites coming forward on three sides simultaneously. It should be noted that the RNP set out sufficient housing allocations within the Town, and the broad boundary and policy for strategic housing at Rushden East was adopted in 2016.
- 4.5 RTC identified significant concerns regarding Rushden Lakes West in their March 2020 consultation response on additional sites. Concerns included:
- Unsustainable Location
 - Lack of Connectivity
 - Lack of benefits to the Town
 - Excessive number of dwellings proposed
 - Traffic Impact on surrounding road network
 - Impact on the Upper Nene Valley Gravel Pits SPA
 - Landscape Impacts
 - Non-Conformity with Adopted Rushden Neighbourhood Plan
- 4.6 Since the March consultation, it is clear that statutory stakeholders have raised objections to the site which compromise the deliverability of Rushden Lakes West and demonstrate a potential impact to the SPA arising from residential development in this location.
- 4.7 Because of their previous concerns and the subsequent inclusion of a more suitable proposed allocation at Rushden South East, RTC now strongly object to the inclusion of Rushden Lakes West as a proposed allocation in the ELP.
- 4.8 The concerns outlined in respect of Rushden Lakes West are not attributed to Rushden South East, as they either have a much lesser impact, or can be more easily mitigated.
- 4.9 It should be noted that Rushden South East is in single ownership and has a housing developer is actively promoting the site for development, demonstrating it is deliverable.
- 4.10 RTC raised concerns in the March 2020 consultation that direct consultation between ENC and RTC was not taking place soon enough to enable them to have input into emerging proposals.

5. POLICY CONTEXT

- 5.1 When the two proposed allocations are assessed against adopted planning policy, Rushden South East is assessed as better or able to provide mitigation more easily.

- 5.2 Core objectives of the RNP include supporting proposals that enhance the vitality and viability of Rushden Town Centre. Future residents at Rushden South East are far more likely to use the Town Centre than residents at Rushden Lakes West who are situated immediately adjacent to the A45 and would be more likely to drive two miles to Wellingborough for local shopping.
- 5.3 RNP Policy H2 states that development proposals will be supported unless they would result in a poor relationship with its surroundings. Residential development at Rushden Lakes would not be well related to the Town. The site is far from any existing residential properties and is segregated from the Town by dual carriageway infrastructure.

6. CONCLUSION

- 6.1 Whilst RTC acknowledge the residual requirement means that additional site(s) are necessary to be allocated for the area, the allocation of two separate sites with capacities of 350 and 450 dwellings means that Rushden would be significantly overproviding housing.
- 6.2 Although Rushden has status as a growth town, RTC are concerned that the level of housing proposed could go far beyond what has been reasonably planned for the town. The current development framework including the JCS and RNP have both allocated strategic and small/medium site within and around the town. The allocation of two separate sites to the north and south of the town would be excessive and constitute an overprovision of housing for the town.
- 6.3 The previous concerns raised by RTC regarding Rushden Lakes West in the March 2020 consultation should be regarded as still relevant and are resubmitted along with this representation for reference.
- 6.4 The ELP cannot progress with Rushden Lakes West as an allocation at this time. The site has not been demonstrated to be deliverable as per the definition within the Framework. Any attempt to include the site at this stage, risks the Local Plan being found unsound due to failing the deliverability test and impact on the European SPA designation.
- 6.5 Rushden South East should therefore be carried forward as an allocation instead of Rushden Lakes West.