

## GENERAL

Copies of the following are included to give context to the comments below: -

- Letter dated 19th December 2012 to North Northamptonshire Planning Unit re Core Strategy Consultation.
- Higham Ferrers Town Council Position Statement dated October 2015 – Submitted as part of evidence to the Inspector for the Core Strategy
- Higham Ferrers Town Council Position Statement December 2016- Sent to Rushden East Board and East Northants Council.
- Extract from Inspectors Report for the Core Strategy – p108 and 112
- Copy of response re Scoping Opinion – June 2017

## BOUNDARIES OF RUSHDEN EAST

Higham Ferrers Town Council have been consistent in their views on the extent of the boundaries for Rushden East right from initial consultations as part of the development of the Core Strategy. Their view has always been that the development should be focussed towards the south and have objected to any of the boundaries extending towards Chelveston Road. The Core Strategy includes an indicative area of search and the proposed boundaries extend outside of this area.

Despite comments by the Inspector for the Core Strategy that the detailed concerns of the Town Council need to be considered as part of the masterplan process, the Council do not feel that enough credence has been given to these concerns.

## PEDESTRIAN ACCESS

The proposed connectivity between Rushden East and the existing town areas of Rushden and Higham Ferrers is inadequate.

A Sustainable Urban Extension (SUE) should promote sustainable travel as much as possible, especially when the proposed employment areas are so close to existing towns.

According to the Masterplan Framework Document (MFD), the section of Rushden East to be situated within Higham Ferrers Town Council area is to be predominantly employment facilities. Higham Ferrers Town Council are not against an employment-led mixed-use site, provided it is a fully mixed-use site which includes housing and community facilities as per the Higham Ferrers Neighbourhood Plan Policy HF.H3 which states

- Allocation of housing and employment land to meet the needs of Higham Ferrers residents.
- Allocation of future community facilities including potential land for allotment and sports pitches.”

The connections being proposed for the town of Higham Ferrers are insufficient as the town is not properly considered in this version of the Masterplan.

Within the MFD, it is shown that connectivity to Higham Ferrers will be via a 'super crossing' at the John Clarke Way roundabout. This will be an 'at grade' crossing with space for pedestrians and cyclists to cross.

The MFD is missing crucial detail of the links to the existing greenway in Higham Ferrers and Rushden.

The Higham Ferrers Neighbourhood Plan (HFNP) Policy HF.H3 refers to

"Provision of a safe and high-quality link across the A6 between the site and land to East of Ferrers School site connecting the existing Greenway and Footpath UK2".

To satisfy the requirement of this Neighbourhood Plan policy, additional connectivity should be considered, including a new footbridge over the A6 to serve the town of Higham Ferrers.

In relation to connectivity, Policy 33 of the NNJCS requires:

"b) Good connections by all modes across the A6 to the rest of Rushden and to Higham Ferrers, in particular the town centres and employment destinations".

"f) A permeable and well-connected grid of streets and new links to connect with the wider Greenway network". The maps in the MFD pages 6/7 and 30 do not identify any links into Higham Ferrers.

With the major proportion of employment from the proposed SUE situated within Higham Ferrers boundary, it is essential that better connections are realised to ensure that this area of the SUE is sustainable. Connections need to be installed to promote two-way connectivity both to help residents of the existing parts of Higham Ferrers access the new facilities and employment, and for new residents to be able access the town of Higham Ferrers via sustainable methods of transport, for example by foot or cycle.

With only the 'super crossing' at John Clarke Way, residents of Higham Ferrers using sustainable methods of transports such as cycling and walking will have a long and indirect journey to reach the employment area.

This is especially important due to the development that is currently proposed or allocated in Higham Ferrers such as the Special School site west of Moulton College (Emerging Local Plan Part 2 allocation), the allocated housing site of Ferrers School (Higham Ferrers Neighbourhood Plan allocation) and the site at the Former Textile Bonding Factory (Emerging Local Plan Part 2 allocation).

These three sites will create a large number of additional residential dwellings and potential people movements, many of whose residents would be well suited to working within the Rushden East SUE. Their potential commute should be made as easy as possible.

There is a concern over the deliverability of the 'super crossings'. No evidence has been put forward for how these will be carried out and delivered. No information is provided on how the A6 is to be treated as part of the SUE development. It is acknowledged that full information will be available as part of a formal planning application submission, however it would be useful to see further information on these links prior to this, as they are key to the connectivity of the SUE.

In summary, Higham Ferrers Town Council wish to place strong emphasis on the need for additional connectivity to the town and that more connections should be considered and detailed on the masterplan.

The framework concept plan (figure 1.1) on pages 6/7 features a polygon to highlight the town centre of Rushden with connections leading to it. The same should be detailed for Higham Ferrers – the town centre should have its own polygon and the pedestrian and cycle links should be demonstrated.

Further dialogue should take place with Higham Ferrers Town Council to ensure that the planning application, when submitted, is compliant with the HFNP Policy HF.H3.

## VEHICULAR ACCESS

It is acknowledged that the 'character' of the A6 will need to change to accommodate the at grade crossing and wider SUE. There are concerns regarding the amount of calming to the A6.

No evidence base has been included within this consultation regarding traffic modelling and impact of traffic flow on surrounding roads. The A6 road is a bypass to Higham Ferrers and the Town Council do not want it to be downgraded to such an extent that it forces vehicular traffic through the town.

## HOMES

Higham Ferrers Town Council acknowledge that the Rushden East SUE has been allocated under NNJCS Policy 33 and do not object to the principle of the development.

The need for affordable housing should be noted. Policy 30 of the NNJCS requires that 20% of the new homes in Rushden East are affordable up to March 2026. The MFD refers to this under paragraph 2.4.7 and this needs to transmit into any planning application. Paragraph 2.4.8 states that the promoters of the development should share their viability appraisals with the Council at an early stage in order to demonstrate that the development is policy compliant, in respect of affordable housing.

The mix of type and tenure of new homes outlined in paragraph 2.4.9 is supported and is encouraged within the Higham Ferrers area of the SUE in order to create an appropriate mix of uses of employment, leisure and housing, including affordable housing.

## EMPLOYMENT

The majority of the employment land for the SUE has been placed within the Higham Ferrers administrative area, however, the Town Council have seen no evidence as to the reasoning behind this decision.

Whilst not available as a part of the public consultation, ENC have provided a report carried out on behalf of the consortium titled 'Rushden East SUE Employment Mix Review' (Stantec, January 2020). This appears to be the only evidence paper to suggest why the consortium are proposing this level of employment land.

The report does not assess the locations of the proposed employment areas but tests different potential use classes for the employment areas.

The report is flawed as it appears biased towards B8 uses and maximising the amount of employment land. It references the need for more employment land but does not quantify this with supporting evidence and relies on references to Government schemes such as the Oxford-Cambridge Arc which is still in very early stages. The Government have not released any details of what kind of support they will be offering or how this scheme may come forward (if at all).

Paragraph 2.1.14 of the Stantec report states that "a large scale, office-led mix will give a greater economic uplift, but is not well balanced to the local skillset and therefore would be difficult to deliver in terms of demand and build out."

This approach appears to neglect the current local skillsets of Rushden and Higham Ferrers, as well as providing a limited appeal for new residents of the SUE to work at these employment areas. If there is an abundance of low skilled employment opportunities, it will be more difficult to attract a mix of new residents who will live within the SUE. Too much reliance on a single use such as B8 will also promote out-commuting which is not in conformity with the Rushden and Higham Neighbourhood Plans as well as the NNJCS.

HFTC require a mix of uses to include community facilities housing and employment. Of this employment, no warehousing (B8 uses) should be proposed.

There appears to be too much emphasis placed on the employment section of the development and not enough on the residential, community and leisure aspects of this area

There is a concern over the use of this land, especially as it is on a raised location within Higham Ferrers Parish and is likely to be visible from parts of the town. In the MFD, this land is identified for employment use, with a small area for a local centre and a small area for residential.

On several occasions throughout the emerging SUE proposals, Higham Ferrers Town Council have raised whether this proposed land use is appropriate. A mixed use is more appropriate than a dense area of business or warehouse units. The uses should be better integrated around the SUE in any future proposals.

Higham Ferrers Town Council are concerned about the potential for multiple, large B8 (Warehouse and Distribution) units filling this area. The Town Council would prefer to see a mix of employment units as well as residential, with the employment uses better spread throughout the SUE. No need has been demonstrated for B8 warehouses paragraph 2.5.7 of the MFD is supported. The Town

Council feel that there are much more beneficial employment uses that should be proposed rather than B8.

Further information should be included to detail the type of use that the proposal is considering. The HFNP Policy HF.H3 sets out what the masterplan proposal should consider.

- Provision of a safe and high-quality link across the A6 between this site and land to East of Ferrers School site connecting the existing Greenway and Footpath UK2.
- Allocation of housing and employment land to meet the needs of Higham Ferrers residents.

Paragraph 2.5.5 is supported in the context of an enterprise and innovation space, however, this should be provide more detail such as the types of uses proposed. It should include reference to small start-up businesses.

The question above states that the Council want to diversify / improve the mix of job types that are available to residents and to reduce the need for people who have to commute to work outside of East Northamptonshire. To facilitate this, it is essential that appropriate connections are made between the SUE and Higham Ferrers, to encourage sustainable transport and present an attractive area for residents to work.

The area within the SUE to the north lies on an elevated topography and should carefully consider the impacts on nearby designated heritage assets, in particular the Grade I Listed St Mary's Church. Important vistas to this Church should be protected. It is recognised that these have been considered in the MFD and this should follow through in the planning application.

## GREEN SPACES

Higham Ferrers Town Council strongly disagree with the proposed placement of the cemetery. The proposed location at the southern end of the SUE area means that many Higham Ferrers residents will not want to use these spaces. Higham Ferrers residents want to be buried within the area they lived, not at the opposite end of a neighbouring town.

As a consequence, the proposed cemetery location is only likely to be useful for Rushden residents. The location should be closer to Higham Ferrers, so that the two towns can both use the space.

There is no evidence as to why the cemetery is to be located in this area, especially as Higham Ferrers Town Council have previously expressed their desire for a cemetery to be located close to Higham Ferrers.

Paragraph 2.2.29 states that "the masterplan includes a requirement for a new cemetery with associated car parking to serve Rushden and Higham Ferrers. The rest of the paragraph then omits any reference to Higham Ferrers and focuses on Rushden.

It is noted that no allotment space is provided within the Higham Ferrers area. Higham Ferrers Town Council would be happy to run any allotment space if it is placed within their administrative area. The town currently has no allotments and the Council have a waiting list for interested parties.

The East Northamptonshire Open Space Standards Paper identifies a catchment gap and recommends an action of “New allotment provision should be sought to a minimum size of 0.85 hectares. This will help to tackle catchment gaps and any waiting lists across Higham Ferrers” (page 15).

The Higham Ferrers Neighbourhood Plan Policy H3 states that proposals for the land within Higham Ferrers should consider “allocation of future community facilities including potential land for allotments and sports pitches”.

It is understood that Rushden Town Council would not object to the cemetery being on the border of the two parishes. SCHOOLS

This infrastructure should be made as accessible as possible to residents in Higham Ferrers. The Town Council support the need for the provision of schools. It is essential that these schools and infrastructure are located within easy access of Higham Ferrers, with emphasis on connectivity to the Town to allow the schools to serve Higham Ferrers sustainably, not just Rushden.

The current proposals do not make sustainable travel such as walking/cycling as easy as it should be for residents of Higham Ferrers. HAYDEN ROAD GREEN CORRIDOR

Higham Ferrers Town Council support the creation of an access into Rushden East via Hayden Road/Alexander Road. This is an

essential location for a crossing point, being at the centre of the SUE development and helping to open up the Alexander Road area for new development in conjunction with the SUE.

Of the figures presented on page 33 of the MFD, figure 2.23 is supported – to create a roundabout. This will provide ease of crossing for pedestrians, cyclists, and vehicles.

The roundabout will create an element of traffic calming along the A6, naturally helping change the character of the road, whilst still being fully functional.

Figure 2.23 appears to be most in line with NNJCS Policy 33, specifically point b) which states the good connections by all modes should be made across the A6 to the rest of Rushden and Higham Ferrers, in particular the town centres and other key service and employment destinations.

#### ADDITIONAL COMMENTS

The MFD sets out the benefits that the SUE will bring to Rushden.

The MFD clearly over-looks the town of Higham Ferrers and any benefits that can be appropriated to the town of Higham Ferrers. The maps do not take account of connectivity into Higham Ferrers, the Greenways are not addressed, and the employment area appears to have been placed within the Higham Ferrers administrative area with little justification for the land use in this location.

LDA Design who drafted the MFD did not have any direct correspondence with Higham Ferrers Town Council.

The appropriate local policies for Higham Ferrers have not been applied to the MFD. The over-looking of Higham Ferrers is most evident in the plan on page 18 which bears no reference to Higham Ferrers and omits reference to the town in paragraph 2.1.8. It is clear that reference needs to be made to connectivity to Higham Ferrers throughout the MFD and should be shown on all plans.

Higham Ferrers Town Council agree with paragraph 2.5.7 in respect of large B8 sites, however, this paragraph should be quantifiable to avoid future confusion. The employment area should be allocated for a mix of B1 and suitable B2 uses. B8 uses are in no way supported and Higham Ferrers Town Council would like to be further consulted on the proposed uses in this area, due to the limited level of detail set out in the MFD.

The text within the MFD should go further to state what type of employment uses will be proposed in an application, particularly in the section of the SUE within the Higham Ferrers area. Higham Ferrers Town Council are particularly concerned about the mix of uses in this area and want to ensure that the area will be compliant with both Neighbourhood Plan and Local Plan Part 1 policy, as there are strong concerns that if the planning application does not take account of the issues raised in this consultation response in regards to Higham Ferrers, it will not be compliant with these policies.

The Inspector's report on the Examination into the North Northamptonshire Joint Core Strategy (22 June 2016) referenced the SUE and stated that the masterplan will need to take into account the Higham Ferrers Neighbourhood Plan (paragraph 108). The report also stated that the "detailed concerns expressed by Higham Ferrers Town Council regarding site boundaries and related matters... will