

Personal Details		Agents Details (if applicable)	
<i>Organisation Name:</i>	Taylor Wimpey UK Limited/ BDW Trading Limited	<i>Organisation Name:</i>	Savills

Are you responding, to object to, or in support of the Plan?

Object	<input checked="" type="checkbox"/>
Support	<input checked="" type="checkbox"/>

To which statutory requirement does your response relate?

1) <i>Legal compliance</i>	<input type="checkbox"/>
2) <i>Compliance with the Duty to Cooperate</i>	<input type="checkbox"/>
3) <i>Soundness</i>	<input checked="" type="checkbox"/>

If your response is about the Plan's "soundness", to which of the soundness tests does it relate?

a) <i>Positively prepared</i>	<input checked="" type="checkbox"/>
b) <i>Justified</i>	<input checked="" type="checkbox"/>
c) <i>Effective</i>	<input checked="" type="checkbox"/>
d) <i>Consistent with national policy</i>	<input checked="" type="checkbox"/>

Please provide details about what part/ parts of the Local Plan your representation relates (as appropriate)

Section/ Chapter

<i>Number/ reference</i>	Figure 6
<i>Heading</i>	Local Plan Spatial Strategy – Settlement Hierarchy

Policy/ paragraph

<i>Number/ reference</i>	
<i>Heading</i>	

Policies Map

<i>Number/ reference</i>	
<i>Heading</i>	

Statement

How does the Plan, section, or policy/ paragraph meet, or fail to meet, the relevant statutory requirements [(1)-(3), above] and/ or soundness test [(a) – (d), above]?

We object to Figure 6 only on the basis that it does not identify Rushden as a Growth Town. We support the Spatial Development Strategy under Policy EN1 and consider the status of Rushden in the Settlement Hierarchy should be identified on Figure 6. In our view Figure 6 does not pass the effective test of soundness without proper identification of the status of Rushden as a Growth Town. Rushden is identified as a Growth Town within the North Northants Core Strategy and this status has not changed. It would be effective to identify this on Figure 6.

For an objection, how could the Plan, section, or policy/ paragraph be amended in order to meet the stated statutory requirement and/ or soundness test?

Figure 6 to identify Rushden as a Growth Town.

Personal Details		Agents Details (if applicable)	
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Object	<input checked="" type="checkbox"/>
Support	<input checked="" type="checkbox"/>

To which statutory requirement does your response relate?

1) Legal compliance	<input type="checkbox"/>
2) Compliance with the Duty to Cooperate	<input type="checkbox"/>
3) Soundness	<input checked="" type="checkbox"/>

If your response is about the Plan's "soundness", to which of the soundness tests does it relate?

a) Positively prepared	<input checked="" type="checkbox"/>
b) Justified	<input checked="" type="checkbox"/>
c) Effective	<input checked="" type="checkbox"/>
d) Consistent with national policy	<input checked="" type="checkbox"/>

Please provide details about what part/ parts of the Local Plan your representation relates (as appropriate)

Section/ Chapter

Number/ reference	Figure 8
Heading	The Greenway

Policy/ paragraph

Number/ reference	
Heading	

Policies Map

Number/ reference	
Heading	

Statement

How does the Plan, section, or policy/ paragraph meet, or fail to meet, the relevant statutory requirements [(1)-(3), above] and/ or soundness test [(a) – (d), above]?

We object to Figure 8 only on the basis that it does not identify the Rushden East Sustainable Urban Extension. Given the scale of this development at Rushden, which is identified as a Growth Town, we consider it is appropriate to show the extent of the SUE in the context of The Greenway. We have no objection to the Aspirational Connections shown on Figure 8. In our view Figure 8 does not pass the effective test of soundness without identification of the Rushden East Sustainable Urban Extension.

For an objection, how could the Plan, section, or policy/ paragraph be amended in order to meet the stated statutory requirement and/ or soundness test?

Figure 8 to identify the Rushden East Sustainable Urban Extension.

Personal Details		Agents Details (if applicable)	
Organisation Name:	Taylor Wimpey UK Limited	Organisation Name:	Savills

Are you responding, to object to, or in support of the Plan?

Object

Support

To which statutory requirement does your response relate?

- 1) Legal compliance
- 2) Compliance with the Duty to Cooperate
- 3) Soundness

If your response is about the Plan's "soundness", to which of the soundness tests does it relate?

- a) Positively prepared
- b) Justified
- c) Effective
- d) Consistent with national policy

Please provide details about what part/ parts of the Local Plan your representation relates (as appropriate)

Section/ Chapter

Number/ reference	
Heading	

Policy/ paragraph

Number/ reference	EN1
Heading	Spatial development strategy

Policies Map

Number/ reference	
Heading	

Statement

How does the Plan, section, or policy/ paragraph meet, or fail to meet, the relevant statutory requirements [(1)-(3), above] and/ or soundness test [(a) – (d), above]?

We support the Spatial Development Strategy and Policy EN1 as meeting the tests of soundness. Rushden is correctly identified in the proposed Local Plan Part 2 as the Growth Town in East Northamptonshire District. This complies with the North Northamptonshire Joint Core

For an objection, how could the Plan, section, or policy/ paragraph be amended in order to meet the stated statutory requirement and/ or soundness test?

Personal Details		Agents Details (if applicable)	
Organisation Name:	Taylor Wimpey UK Limited	Organisation Name:	Savills

Are you responding, to object to, or in support of the Plan?

Object	<input checked="" type="checkbox"/>
Support	<input checked="" type="checkbox"/>

To which statutory requirement does your response relate?

1) Legal compliance	<input type="checkbox"/>
2) Compliance with the Duty to Cooperate	<input type="checkbox"/>
3) Soundness	<input checked="" type="checkbox"/>

If your response is about the Plan's "soundness", to which of the soundness tests does it relate?

a) Positively prepared	<input checked="" type="checkbox"/>
b) Justified	<input checked="" type="checkbox"/>
c) Effective	<input checked="" type="checkbox"/>
d) Consistent with national policy	<input checked="" type="checkbox"/>

Please provide details about what part/ parts of the Local Plan your representation relates (as appropriate)

Section/ Chapter

Policy/ paragraph

Policies Map

Number/ reference	Heading	Number/ reference	Heading	Number/ reference	Heading
		EN18	Development of Commercial space to support economic growth		

Statement

How does the Plan, section, or policy/ paragraph meet, or fail to meet, the relevant statutory requirements [(1)-(3), above] and/ or soundness test [(a) – (d), above]?

We do not object to Policy EN18 as this just looks to support delivery of flexible managed workspace for small and micro-businesses and does not seek to set policy for a minimum or maximum provision. It is important that LPP2 policy complies with the North Northamptonshire Joint Core Strategy, 2011-2031, for example Policy 24 Logistics, which supports large scale strategic distribution where they comply with the spatial strategy. Please also see our response to proposed Policy EN33 Rushden East Sustainable Urban Extension, where we raise concerns about Paragraph 2.5.7 of the Rushden East Masterplan Framework Document, which is proposed to be Appendix 6 of LPP2.

For an objection, how could the Plan, section, or policy/ paragraph be amended in order to meet the stated statutory requirement and/ or soundness test?

Personal Details		Agents Details (if applicable)	
Organisation Name:	Taylor Wimpey UK Limited	Organisation Name:	Savills

Are you responding, to object to, or in support of the Plan?

Object	<input checked="" type="checkbox"/>
Support	<input checked="" type="checkbox"/>

To which statutory requirement does your response relate?

1) Legal compliance	<input type="checkbox"/>
2) Compliance with the Duty to Cooperate	<input type="checkbox"/>
3) Soundness	<input checked="" type="checkbox"/>

If your response is about the Plan's "soundness", to which of the soundness tests does it relate?

a) Positively prepared	<input checked="" type="checkbox"/>
b) Justified	<input checked="" type="checkbox"/>
c) Effective	<input checked="" type="checkbox"/>
d) Consistent with national policy	<input checked="" type="checkbox"/>

Please provide details about what part/ parts of the Local Plan your representation relates (as appropriate)

Section/ Chapter

Number/ reference	
Heading	

Policy/ paragraph

Number/ reference	EN22
Heading	Impact test thresholds for retail development

Policies Map

Number/ reference	
Heading	

Statement

How does the Plan, section, or policy/ paragraph meet, or fail to meet, the relevant statutory requirements [(1)-(3), above] and/ or soundness test [(a) – (d), above]?

We request clarification that Policy EN22 does not apply to the Rushden East Sustainable urban Extension. This is because the SUE has already been assessed and is the subject of allocation for mixed-use under Policy 33 of the North Northamptonshire Joint Core Strategy, 2011-2031. The proposed Rushden East Masterplan Framework Document supports provision of more than one local centre within the SUE.

For an objection, how could the Plan, section, or policy/ paragraph be amended in order to meet the stated statutory requirement and/ or soundness test?

Personal Details		Agents Details (if applicable)	
Organisation Name:	Taylor Wimpey UK Limited	Organisation Name:	Savills

Are you responding, to object to, or in support of the Plan?

Object

Support

To which statutory requirement does your response relate?

1) Legal compliance

2) Compliance with the Duty to Cooperate

3) Soundness

If your response is about the Plan's "soundness", to which of the soundness tests does it relate?

a) Positively prepared

b) Justified

c) Effective

d) Consistent with national policy

Please provide details about what part/ parts of the Local Plan your representation relates (as appropriate)

Section/ Chapter

Number/ reference

Heading

Policy/ paragraph

Number/ reference

Heading

Policies Map

Number/ reference

Heading

Statement

How does the Plan, section, or policy/ paragraph meet, or fail to meet, the relevant statutory requirements [(1)-(3), above] and/ or soundness test [(a) – (d), above]?

We object to Policy EN29 as we consider this is not justified or consistent with national policy. Whilst we support the provision of a range of housing types and design, including wheelchair accessible design, we have not seen evidence to support the potential provision of at least 5% from new housing development across the District. In addition, there is typically no ability to control who occupies future market housing and hence whether wheelchair accessible housing as part of open market housing will be matched to the needs of the population.

For an objection, how could the Plan, section, or policy/ paragraph be amended in order to meet the stated statutory requirement and/ or soundness test?

We request a change to Policy EN29 arising from a more detailed assessment of need and potential provision and that any policy applies only to the provision of affordable housing and not to open market housing.

Personal Details		Agents Details (if applicable)	
Organisation Name:	Taylor Wimpey UK Limited	Organisation Name:	Savills

Are you responding, to object to, or in support of the Plan?

Object

Support

To which statutory requirement does your response relate?

1) Legal compliance

2) Compliance with the Duty to Cooperate

3) Soundness

If your response is about the Plan's "soundness", to which of the soundness tests does it relate?

a) Positively prepared

b) Justified

c) Effective

d) Consistent with national policy

Please provide details about what part/ parts of the Local Plan your representation relates (as appropriate)

Section/ Chapter

Number/ reference	
Heading	

Policy/ paragraph

Number/ reference	EN31
Heading	Older people's housing provision

Policies Map

Number/ reference	
Heading	

Statement

How does the Plan, section, or policy/ paragraph meet, or fail to meet, the relevant statutory requirements [(1)-(3), above] and/ or soundness test [(a) – (d), above]?

We do not object to Policy EN31 where relevant to the Rushden East Sustainable Urban Extension but we would request clarification as to the Council's approach to reaching agreement on specialist housing provision through the preparation of a Masterplan Development Framework or a Strategic Masterplan. The Masterplan

For an objection, how could the Plan, section, or policy/ paragraph be amended in order to meet the stated statutory requirement and/ or soundness test?

Personal Details		Agents Details (if applicable)	
Organisation Name:	Taylor Wimpey UK Limited	Organisation Name:	Savills

Are you responding, to object to, or in support of the Plan?

Object

Support

To which statutory requirement does your response relate?

1) Legal compliance

2) Compliance with the Duty to Cooperate

3) Soundness

If your response is about the Plan's "soundness", to which of the soundness tests does it relate?

a) Positively prepared

b) Justified

c) Effective

d) Consistent with national policy

Please provide details about what part/ parts of the Local Plan your representation relates (as appropriate)

Section/ Chapter

Number/ reference

Heading

Policy/ paragraph

Number/ reference EN32

Heading

Policies Map

Number/ reference

Heading

Statement

How does the Plan, section, or policy/ paragraph meet, or fail to meet, the relevant statutory requirements [(1)-(3), above] and/ or soundness test [(a) – (d), above]?

We object to Policy EN32 as we consider this is not justified or consistent with national policy. Whilst we support the provision of a range of housing types and design, including self-build and custom-build housing, we have not seen evidence to support the potential provision of at least 5% of plots to be made available on site as serviced custom build plots. Need should be informed by evidence held by the Council and this is not justified at this proposed level of provision.

For an objection, how could the Plan, section, or policy/ paragraph be amended in order to meet the stated statutory requirement and/ or soundness test?

We request a change to Policy EN32 arising from a more detailed assessment of need and potential provision.

Personal Details		Agents Details (if applicable)	
Organisation Name:	Taylor Wimpey UK Limited	Organisation Name:	Savills

Are you responding, to object to, or in support of the Plan?

Object	<input checked="" type="checkbox"/>
Support	<input checked="" type="checkbox"/>

To which statutory requirement does your response relate?

1) Legal compliance	<input type="checkbox"/>
2) Compliance with the Duty to Cooperate	<input type="checkbox"/>
3) Soundness	<input checked="" type="checkbox"/>

If your response is about the Plan's "soundness", to which of the soundness tests does it relate?

a) Positively prepared	<input checked="" type="checkbox"/>
b) Justified	<input checked="" type="checkbox"/>
c) Effective	<input checked="" type="checkbox"/>
d) Consistent with national policy	<input checked="" type="checkbox"/>

Please provide details about what part/ parts of the Local Plan your representation relates (as appropriate)

Section/ Chapter

Number/ reference	
Heading	

Policy/ paragraph

Number/ reference	EN33
Heading	Rushden East Sustainable Urban Extension

Policies Map

Number/ reference	
Heading	

Statement

How does the Plan, section, or policy/ paragraph meet, or fail to meet, the relevant statutory requirements [(1)-(3), above] and/ or soundness test [(a) – (d), above]?

We support Policy EN33 overall on the basis that this is the policy within the Local Plan Part 2 which is intended to further shape delivery of the Rushden East Sustainable Urban Extension and builds upon the allocation within the North Northamptonshire Joint Core Strategy.

Taylor Wimpey UK Limited (TW) and BDW Trading Limited (BDW) control the majority of the land which is covered by Policy EN33 and within Appendix 6, which is the proposed Masterplan Framework Document (MFD).

BDW and TW have been involved in the planning for development at the site of the Sustainable Urban Extension (SUE) for some 7 years.

We take pride in the preparation, explanation and engagement in forming the vision and detail for the new community within the emerging SUE which adjoins the historic towns of Rushden and Higham Ferrers.

We participated in the examination into the now adopted North Northants Joint Core Strategy (NNJCS), we engaged in the process which has led to the neighbourhood plans for Rushden and Higham Ferrers and we have pro-actively engaged in the preparation of the MFD.

In June 2019 TW, BDW and Camland (Rushden) Ltd held public exhibition of plans in Rushden and in Higham Ferrers in respect of development of the majority of the SUE to be proposed under what was then, an emerging planning application. This site has been named High Hayden Garden Community.

In November 2020, an outline planning application by TW and BDW was registered by East Northamptonshire Council (ENC) and assigned application reference: 20/01453/OUT.

This outline planning application remains under consideration by ENC. The outline planning application covers an area of 197.73. This sits within the extent of

land covered by the MFD and it comprises the majority of the land under Policy EN33.

Broadly speaking the masterplan in the MFD and the masterplan under the outline planning application accord but there are some aspects of the content of the MFD that we consider need to be amended, to ensure the SUE is deliverable.

3

We consider the changes required to the MFD are relevant to all tests of soundness.

The only change we propose to Policy EN33 itself is for clarification that the intention of the Council for the 'grey land', located within the SUE, (as shown in figure 2.1 of the MFD) which is to be brought forward through guidance to be provided in a Supplementary Planning Document, does not delay delivery of development from the wider SUE.

We consider it is important for the Council to state that delivery from the wider SUE will not be held-up pending preparation and adoption of any SPD in respect of the grey land.

Masterplan Framework Document

The following comments comprise our comments on, and objections to, relevant parts of the MFD which is cross-referred to in EN33 and contained at Appendix 6.

It is our understanding that the MFD is not intended to be a Supplementary Planning Document provided for within the 2004 Planning and Compulsory Purchase Act to enable greater detail on specific policies within the Development Plan. The process for preparing statutory SPDs is set out in Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (Statutory Instrument 2012 No. 767), as amended. The MFD does not appear to be set-out as development plan policy but rather an appendix which provides 'support' to the development plan policy, being EN33. We request clarity on this matter from the Council.

Paragraph 1.1.7

This paragraph refers to 'avoiding ransom situations.' We consider this is not justified, effective or consistent with national policy because planning policy and supporting guidance should not seek to control land provisions like this. Commercial deals sit outside of the planning process.

Paragraph 1.2.2

This paragraph states: "This trajectory assumes that the first 100 new homes will be completed by March 2021 so any delay to this will potentially reduce the number of new homes completed in the SUE within the current plan period." Whilst we acknowledge this is stated in the context of the housing trajectory within the NNJCS, it is no longer relevant as the trajectory has been updated and this once forecast of delivery will not be achieved. We suggest amendment to the explanation under this paragraph.

Section 2.3

This section contains commentary and illustrative examples of 'super crossings' on the A6 Liberty Way to the west of the SUE. Whilst we acknowledge the importance of good connectivity between the SUE and the towns of Rushden and Higham Ferrers, we have not seen evidence that super crossings are the most appropriate designs. We have not seen support from Northamptonshire County Council to this design of highway junction, which we understand does not currently exist in its proposed design within Northamptonshire. These seems quite experimental in nature.

Whilst we appreciate forward-thinking highway design, there is a concern that the MFD seeks absolute compliance with designs for super-crossings in the MFD, whereas these designs are untested and at this stage do not have highway authority support.

The planning application requirements under this section of the MFD states that applications must [our emphasis] include detailed designs of the super crossings for the John Clark Way

4 and Newton Road roundabouts and the Hayden Road crossing. These should be based on the arrangements shown in figures 2.17 to 2.19 and figures 2.21 to 2.23 of the MFD or a clear rationale provided for any alternative approach to the three crossings demonstrating how they apply the 'super crossing' principles set out in section 2.3.2. We consider this is too prescriptive and would not be justified or effective.

Paragraph 2.5.7

This paragraph states: "The Council has clearly indicated that large buildings/units for warehousing and distribution uses (B8) will not be supported as part of the SUE. A large unit/building is defined in policy 24 (footnote 88 – page 118) of the Joint Core Strategy as having a floor area over 9,300 sqm (100,000 sq.ft.)."

We object to this statement as not being justified, effective and not consistent with national policy.

Policy 24 Logistics within the NNJCS does not define employment development in this context and it does not seek to place a restriction on new employment development in this way. We consider that proposed paragraph 2.5.7 within the MFD as Appendix 6 to the proposed Local Plan Part 2 for the District is not appropriate as it conflicts with Policy 22 and Policy 24 of the NNJCS. Neither policy 22 or 24 seek to impose a floor area restriction on new employment development. We consider that policy 24 supports new logistics development across North Northamptonshire, subject to criteria a) to g). Criteria a) states in part: "a) Subject to market demand and viability, strategic distribution developments (involving individual units of 9,300sqm or more floorspace) should also include the provision of a

proportion of floorspace in the form of smaller employment units"

This policy seeks a mix but it does not set a ceiling on new employment buildings. The proposed mixed use nature of the proposed allocation is already consistent with evidence in the form of Background Paper 5 for example on

jobs targets. It is not justified or effective to seek to impose a blanket restriction on B8 units over 9,300 sq.m / 100,000 sq.ft.

The following points are relevant for consideration of B8 uses at the Rushden East SUE:

- Rushden East SUE contributes a substantial number of jobs to the overall jobs target.
- We welcome the land area being allocated for employment at Rushden.
- We welcome the support for jobs at Rushden and reconfirm our commitment to providing a balanced range of employment land uses.
- There is support for B8 in Background Paper 5 and in the Rushden East SUE Employment Land Assessment, Final Report, February 2021, prepared by Lambert Smith Hampton (LSH and we welcome this.
- There is a competitive market for logistics land and Rushden occupies a prime location.
- The NNJCS policy and Background Document 5 supports various employment uses at Rushden. We welcome that in the context that it allows for a balance of uses and does not focus on one sector of the economy.
- There is scope for a science park as part of the employment offer at the SUE with no evidence to justify restricting the size of B8 units to enable a science park to come forward. If the demand is there, then it is possible for a science park to come forward within the employment area of the SUE.
- We note that the Rushden East SUE Employment Land Assessment, Final Report, February 2021, prepared by Lambert Smith Hampton identifies job creation from transportation and logistics, noting wage growth, value add and scarcity of suitable sites, particularly close to

5 major conurbations, and a shortage of labour, all of which the Rushden East SUE can answer. This is further evidence that restricting the size of B8 units is not justified or effective.

Overall there is no supporting evidence for restricting the size of B8 units and the MFD only states that the 'Council has made it clear...' We consider this is a proposed artificial interference in the market not based on evidence and not consistent with the NNJCS which will stifle the potential economic benefits being derived from the SUE. B8 is a booming employment sector creating increasingly high value jobs and Rushden is a prime location. By seeking to impose a restriction in B8 unit sizes, the Council will put in place an unjustified policy constraint

which will affect delivery of economic growth and investment, in a highly competitive market.

For an objection, how could the Plan, section, or policy/ paragraph be amended in order to meet the stated statutory requirement and/ or soundness test?

Personal Details		Agents Details (if applicable)	
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Are you responding, to object to, or in support of the Plan?

Object

Support

To which statutory requirement does your response relate?

1) Legal compliance

2) Compliance with the Duty to Cooperate

3) Soundness

If your response is about the Plan's "soundness", to which of the soundness tests does it relate?

a) Positively prepared

b) Justified

c) Effective

d) Consistent with national policy

Please provide details about what part/ parts of the Local Plan your representation relates (as appropriate)

Section/ Chapter

Number/ reference	Table 15
Heading	Major Sites

Policy/ paragraph

Number/ reference	
Heading	

Policies Map

Number/ reference	
Heading	

Statement

How does the Plan, section, or policy/ paragraph meet, or fail to meet, the relevant statutory requirements [(1)-(3), above] and/ or soundness test [(a) – (d), above]?

We request a change to identify the Rushden East Sustainable Urban Extension with a total capacity of up to 2,700 dwellings and not 2,500 dwellings. This will ensure compliance with the policy position with the Local Plan Part 2 and for the table to be effective. For example, proposed Policy EN33 states that the SUE constitutes a mixed use development, where land is allocated for up to 2,700 dwellings.

For an objection, how could the Plan, section, or policy/ paragraph be amended in order to meet the stated statutory requirement and/ or soundness test?

We request a change to identify the Rushden East Sustainable Urban Extension with a total capacity of up to 2,700 dwellings and not 2,500 dwellings.