



East
Northamptonshire
Council

Planning Policy Committee – 16 December 2013

Rushden Neighbourhood Plan: Neighbourhood Plan Area Boundary

Purpose of report

This report provides a summary of the main issues arising from the statutory consultations regarding the designation of Neighbourhood Plan area boundary for the emerging Rushden Neighbourhood Plan, and seeks Members' approval for the Neighbourhood Area boundary.

Attachment(s)

Appendix 1 – Schedule of representations: consultation regarding Rushden Neighbourhood Plan area boundary

1.0 Introduction

1.1 An initial formal stage in preparing area-based Neighbourhood Plans consists of a statutory 6 week consultation, inviting interested parties (i.e. statutory consultees, local businesses, community groups, residents etc) to make representations to East Northamptonshire Council about the boundary for the area that a Neighbourhood Plan should cover. For the emerging Rushden Neighbourhood Plan, Rushden Town Council proposed that the Neighbourhood Plan area boundary should cover the Rushden parish area, in its entirety. The Planning Policy Committee (22 July 2013) supported consultation to commence on this proposed Neighbourhood Area.

2.0 Number of representations received through the consultation process

2.1 The statutory consultation for the Rushden Neighbourhood Plan boundary took place over 6 weeks (16 August – 14 October 2013, inclusive) in accordance with Regulation 6 of the Neighbourhood Planning (General) Regulations 2012. This consultation invited comments as to whether there is any reason why the District Council should **not** make the designation in respect of Rushden.

2.2 Representations were received from the following:

- English Heritage (8 comments)
- Environment Agency (36 comments)
- Higham Ferrers Town Council (1 comment)
- Natural England (10 comments)
- Smiths Gore (5 comments)

3.0 Summary of representation received

3.1 Generic comments were received from English Heritage, the Environment Agency and Natural England (principal national statutory consultation bodies). These responses, all of which support the proposed designation, highlight the following matters that any Neighbourhood Plan for Rushden ought to take into account:

- Maintaining continuing and constructive dialogue with statutory consultation bodies;
- Ensuring that understanding of environment issues, including statutory designations, is fully considered, e.g. contribution to local character, setting of

- heritage assets, agricultural land quality, protected landscapes/ species;
 - Important statutory designations within, and in the vicinity of, the Plan area, e.g. Upper Nene Gravel Pit Ramsar site/ Special Protection Area, Chichele College, Local Wildlife Sites;
 - Greater community involvement in managing flood risk, e.g. through landscaping and sustainable drainage systems;
 - Opportunities for Neighbourhood Planning include new green infrastructure (e.g. enhancing natural environment), flood risk management, sustainable construction techniques, water quality, water resources, groundwater, waste, climate change;
 - Impact on Higham Ferrers (and vice versa), as both towns contain important heritage assets, including conservation areas, listed buildings and scheduled monuments;
 - Relevant English Heritage, Environment Agency and Natural England guidance and advice documents;
 - Relevant legislation/ procedures, e.g. Water Framework Directive (WFD), Flood and Water Management Act 2010, Strategic Environmental Assessment, Habitat Regulations Assessment.
- 3.2 The Environment Agency also provided more detailed information/ evidence regarding Water Framework Directive assessments of the River Nene and Chelveston Brook, geology/ principal aquifers, groundwater Source Protection Zones and historic landfill sites. Such information may be used to inform policy development for the emerging Neighbourhood Plan, e.g. through understanding specific environmental constraints.
- 3.3 Higham Ferrers Town Council (as the other statutory consultees) has expressed support/ made no objections to the proposed Neighbourhood Plan area boundary. However, it has highlighted that any cross boundary issues between Higham Ferrers and Rushden should be approached in a collaborative way; i.e. Rushden East, Chowns Mill roundabout etc, as these issues have implications for both towns.
- 3.4 Smiths Gore (acting for for the Duchy of Lancaster, promoting development of land to the east of Higham Ferrers) has objected to the neighbourhood planning area proposed. Smiths Gore argues that the only sensible approach is to prepare a joint Rushden/ Higham Ferrers Neighbourhood Plan. Smiths Gore's arguments are summarised as follows:
- Appraisal of land to inform conceptual planning for new neighbourhood (Rushden East) should take account of factors including highways, infrastructure requirements, landscape, topography etc;
 - Neighbourhood Area boundary bisects roundabout at John Clark Way (A6) – difficult for decisions about growth/ development be properly assessed with such a boundary preventing consideration of land immediately outside the area;
 - Neighbourhood Plan should give clear consideration to delivery taking full account of land ownership (i.e. deliverability);
 - Neighbourhood Plan must follow principles set out in strategic plan (i.e. Joint Core Strategy Review).

4.0 Conclusion

- 4.1 This report is presented to Members, for information, as a summary of representations received during the recent statutory consultation regarding the designation of a Neighbourhood Plan area boundary for the emerging Rushden Neighbourhood Plan. One respondent raised an objection in respect of the proposed boundary, arguing that a joint Rushden/ Higham Ferrers Neighbourhood Plan is the only meaningful way to ensure appropriate Neighbourhood Planning for the two towns.
- 4.2 Officers have considered the comments from Smiths Gore, which argue that it is

necessary to prepare a joint Neighbourhood Plan for Rushden and Higham Ferrers. To define the appropriate area, the Local Planning Authority must ensure the neighbourhood areas are coherent, consistent and appropriate in planning terms.

- 4.3 The comments from Smiths Gore present strong arguments about best practice in engaging adjacent communities and Parish/ Town Councils in the preparation of a Neighbourhood Plan. However, it should also be noted that Higham Ferrers Town Council formally expressed a desire to prepare a Neighbourhood Plan for their Parish area in December 2012 and their Neighbourhood Plan boundary area has already been approved (Planning Policy Committee on 17 June 2013). Work is therefore well underway in preparing their Neighbourhood Plan. There would be significant delays in the process if the two Town Councils were now required to prepare a joint Neighbourhood Plan. Given these factors, it is concluded that the preparation of separate Neighbourhood Plans for Rushden and Higham Ferrers, with an emphasis upon very close collaborative working, represents the most appropriate approach.
- 4.4 Smiths Gore has also questioned whether the Rushden East proposals would fulfil the principles set out in the strategic plan, given that the Core Strategy Review still has some way to go and there are continuing objections re planned growth east of the A6 at Rushden. In response, it is emphasised that legal advice has already been taken regarding the possible allocation of land for a Rushden East urban extension, which concluded that this is not precluded by the issue of conformity with the adopted development plan.
- 4.5 Nevertheless, all representations received provide potentially useful guidance and information, which will assist in taking the Rushden Neighbourhood Plan forward. As such, all of the representations received should be used in informing the next stage of the Rushden Neighbourhood Plan processes.

5.0 Equality and Diversity Implications

- 5.1 There are no equality and diversity implications.

6.0 Legal Implications

- 6.1 The consultation under Regulation 6 of the Neighbourhood Planning (General) Regulations 2012 represents the first statutory stage in preparing a Neighbourhood Plans for Rushden. The consultation took place over a 6-week period, in accordance with Regulation 6. The Neighbourhood Plans must be prepared in accordance with all of the relevant Neighbourhood Planning (General) Regulations 2012. Note: Should Rushden Town Council wish to change the area boundary, or any changes be made to parish boundaries in the future through boundary reviews, this would require a further statutory period of consultation to take place to endorse any new Neighbourhood Plan area boundary.

7.0 Risk Management

- 7.1 There are no risks associated with this report.

8.0 Financial implications

- 8.1 There are no financial implications associated with this report.

9.0 Corporate Outcomes

- 9.1 The relevant Corporate Outcomes are:
- Good quality of life – prosperous, sustainable, healthy
 - Effective partnership working
 - Strong community leadership

10.0 Recommendation

- 10.1 The summary of representations received during the recent 6-weeks Regulation 6 consultations, regarding the proposed Rushden Neighbourhood Plan area boundary, is presented to Members for information. Members are asked to endorse the Neighbourhood Plan area boundary for Rushden, as put forward in the formal notice of application for the designation of this Neighbourhood Area (25 June 2013).

(Reason – to enable Rushden Town Council to progress with the preparation of a Neighbourhood Plan).

Legal	Power: Localism Act 2011; Planning and Compulsory Purchase Act 2004; Town and Country Planning Act 1990; Neighbourhood Planning (General) Regulations 2012				
	Other considerations: None				
Background Papers: Planning Policy Committee, 22 July 2013 (Agenda Item 8)					
Person Originating Report:		Michael Burton (Senior Planning Policy Officer) Tel: 01832 742221			
Date: 09 December 2013					
CFO		MO		CX	

(Committee Report Normal Rev. 22)

Appendix 1: Rushden Neighbourhood Plan: Schedule of representations received to the Neighbourhood Plan Area designation

Date	Respondent Name	Email or letter	Do you agree with the boundary Y/N	Consultation responses received	East Northamptonshire Council response	Action
16/08/2013	Smiths Gore	Letter	No	Appreciated that neighbourhood planning process must relate specifically to administrative area of relevant neighbourhood body. In this case is inappropriate because of wider planning context and likelihood that neighbourhood plan will consider potential expansion of Rushden east of A6 as envisaged via Core Strategy Review.	Noted	Facilitate future meetings/ workshops etc involving both Higham Ferrers and Rushden Town Councils, in respect of Rushden East
	Smiths Gore			Appraisal of land to inform conceptual planning for new neighbourhood (Rushden East) should take account of factors including: existing highways, infrastructure requirements, landscape, topography, drainage patterns/ flood risk, existing land use rights of way and connectivity. Boundary bisects roundabout at John Clark Way (A6) - how can meaningful decisions about growth/ development be properly assessed with such a boundary preventing consideration of land immediately outside the area?	Noted. Higham Ferrers Town Council is already preparing its own (whole parish area) Neighbourhood Plan. For both Plans to be sound, these must (as far as possible) be in harmony with one another.	Facilitate future meetings/ workshops etc involving both Higham Ferrers and Rushden Town Councils, in respect of Rushden East
	Smiths Gore			Neighbourhood Plan should give clear consideration to delivery taking full account of land ownership. Hence neighbourhood planning area should take into account land that will meaningfully deliver a new neighbourhood.	Noted. The Neighbourhood Plan must take account of any particular issues affecting delivery of a proposed site allocation.	Inform the Town Council/ pass on representation

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				Neighbourhood Plan must follow principles set out in strategic plan (i.e. Joint Core Strategy Review). Core Strategy Review still has some way to go and there are continuing objections re planned growth east of the A6 at Rushden. On this basis it is premature to embark on a neighbourhood planning process and set out a specific area for this.	Legal advice has already been taken regarding the possible allocation of land for a Rushden East urban extension, which concluded that this is not legally precluded by the issue of conformity with the adopted development plan.	Inform the Town Council/ pass on representation.
	Smiths Gore					
				In respect of planning for a new neighbourhood east of A6, do not support neighbourhood planning area proposed. Only sensible way to overcome this is through joint Rushden/ Higham Ferrers Neighbourhood Plan.	Noted	Facilitate future meetings/ workshops etc involving both Higham Ferrers and Rushden Town Councils, in respect of Rushden East
	Smiths Gore					

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27/08/2013	Natural England	Email with letter attachment	Yes	Natural England is a statutory consultee and must be consulted on draft neighbourhood development plans by the Parish/ Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have the resources to get involved in all neighbourhood plans and will prioritise detailed engagement to those plans that may impact on internationally or nationally designated nature conservation sites, and/or require Strategic Environmental Assessment or screening for Habitats Regulations Assessment.	Noted	Inform the Town Council/ pass on representation
	Natural England			International and European Designated Sites - The following International and European sites fall within the parish boundaries: Upper Nene Gravel Pit Ramsar; Upper Nene Gravel Pit Special Protection Area. If these designated sites are likely be affected by any proposals set out in the Neighbourhood Plan, for example by additional built development or by increased recreation pressure, a Screening Assessment may need to be carried out under the Habitat Regulations. This HRA Screening may be able to draw upon the HRA of the emerging Four Towns Plan.	Noted	Inform the Town Council/ pass on representation
	Natural England			Nationally Designated Sites - Upper Nene Gravel Pits Site of Special Scientific Interest falls within Rushden Parish boundary. The neighbourhood plan as it progresses should avoid any proposal or activity that would be likely to damage or destroy the interest features of this SSSI.	Noted	Inform the Town Council/ pass on representation

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	Natural England		Local Wildlife Sites - The following Local Wildlife Sites fall within the parish boundaries: Skew Bridge Lakes; Viaduct Lake; Ditchford Reserve; Rushden Old railway Line. For further information on these sites contact the Northamptonshire Biological Records Centre which hold a wide range of information on the natural environment: http://www.northamptonshirebiodiversity.org/default.asp_PageID=26&n=Biodiversity+Records+Centre.html .	Noted	Inform the Town Council/ pass on representation
	Natural England		Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf .	Noted	Inform the Town Council/ pass on representation
	Natural England		Protected species - Consider whether the neighbourhood plan has any impacts on legally protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England. http://www.naturalengland.org.uk/ourwork/planningdevelopment/spatialplanning/standingadvice/advice.aspx .	Noted	Inform the Town Council/ pass on representation

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				<p>National Character Areas (NCAs) - Could make reference to the National Character Areas (NCAs) which divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment. Rushden parish falls within NCA: 89 Northamptonshire Vales and key facts and data on this area are available on our website: http://www.naturalengland.org.uk/Images/89_Northamptonshire_Vales_tcm6-32368.pdf.</p>	Noted	Inform the Town Council/ pass on representation
	Natural England			<p>Opportunities for enhancing the natural environment - Neighbourhood plans may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.</p>	Noted	Inform the Town Council/ pass on representation
	Natural England			<p>Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should be considered as part of any new development proposal.</p>	Noted	Inform the Town Council/ pass on representation

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	Natural England			If Plan will significantly impact on designated nature conservation sites or protected species or has other significant impacts on the natural environment then should consult Natural England again.	Noted	Inform the Town Council/ pass on representation
28/08/2013	Higham Ferrers Town Council	Email	Yes	No objections to proposed boundary. Neighbourhood Plan process is already in place for Higham Ferrers and Council therefore believe that any cross boundary issues between Higham Ferrers and Rushden should be approached in a collaborative way . i.e Rushden East, Chowns Mill roundabout etc. as these issues have implications for both towns. Collaborative working may also highlight the possibility of shared opportunities for community facilities such as a cemetery.	Noted	Inform the Town Council/ pass on representation
16/09/2013	Environment Agency	Email with letter attachment	Yes	Opportunities for neighbourhood planning - New green spaces or improvements to public space through new development. This could include linking open spaces to make green corridors for people and wildlife, planting trees, or making improvements to local waterways.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Opportunities for neighbourhood planning - Helping a community to manage the risk of flooding by providing landscaping to manage and store water and by promoting the use of sustainable drainage systems (SuDS).	Noted	Inform the Town Council/ pass on representation

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	Environment Agency			<p>Opportunities for neighbourhood planning - Promote the use of wood and recycled materials in construction and encourage energy efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for those using the building. This will also help the environment by reducing emissions and improving air quality.</p>	Noted	<p>Inform the Town Council/ pass on representation</p>
	Environment Agency			<p>A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while improving the environment. It ensures that the right development is built in the right place at the right time. To assist in the preparation of any document and sustainable development, we have identified the following information to help you maximize environmental gain from future development and to reduce its environmental impact.</p>	Noted	<p>Inform the Town Council/ pass on representation</p>
	Environment Agency			<p>Water Quality - Water Framework Directive (WFD) came into force in December 2000, and was transposed into UK law in December 2003. First principle of the WFD is to prevent deterioration in aquatic ecosystems. No deterioration requires that a water body does not deteriorate from its current ecological or chemical classification, and applies to individual pollutants within a water body.</p>	Noted	<p>Inform the Town Council/ pass on representation</p>

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	Environment Agency			River Nene (GB105032050383) is achieving 'moderate ecological status', achieving 'poor' for orthophosphate and achieving 'high' for biological oxygen demand and ammonical nitrogen. The orthophosphate levels in the River Nene is the result of a combination of sewage treatment work (STW) discharges, Urban runoff and diffuse agricultural inputs. It is considered that STW discharges are the most likely cause of orthophosphate failure. There are two large STW on this stretch of the River Nene (Great Billing and Broughton STW). The River Nene is achieving 'moderate fish status'.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Chelveston Brook (GB105032045090) is achieving 'moderate ecological status', achieving 'moderate' for invertebrates.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			All foul flows from the town of Rushden are conveyed to Broadholme STW for treatment. Broadholme STW currently has capacity for increased effluent flows. Anglian Water Services Limited (AWS) should be consulted to establish whether the existing foul sewerage system has sufficient physical capacity to accept any additional foul drainage and that permit limits, necessary to comply with environmental legislation including the WFD, can be met.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Hoped that the Neighbourhood Plan would actively encourage practices and developments that would help prevent deterioration in water quality. Welcome the opportunity to provide advice on practices and future proposals to avoid unexpected issues arising.	Noted	Inform the Town Council/ pass on representation

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	Environment Agency			Water Resources - Neighbourhood Plan should take into account the availability of potable water supply when assessing new development in the area. The parish lies within the area supplied by AWS and it is assumed that any additional water will be supplied using existing sources and under existing abstraction licence permissions.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Advice should be sought from AWS to find out whether new sources will be needed in the future. We may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Every opportunity should be taken to build water efficiency into new developments, and innovative approaches should be encouraged.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Any proposed development should consider setting high standards regarding water use and other indicators to deliver sustainable development. By making a minimum of Code Level 3 or 4 of the Code for Sustainable Homes, mandatory it would ensure high water efficiency and sustainability performance is achieved for all buildings.	Noted	Inform the Town Council/ pass on representation

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	Environment Agency			Any future development must not affect any water features (i.e. wells, boreholes, springs or ponds) in the area, including licensed and unlicensed abstractions. There are no licensed abstractions within the Parish of Rushden. Certain private water supplies do not require a licence; therefore the Environment Agency is not necessarily aware of their existence. The locations of private domestic sources may be held by the local District Council on the register required by the Private Water Supplies Regulations 1992.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Flood Risk - Parish of Rushden contains several sections of Main River which include the River Nene and Skewbridge Dyke. There are also ordinary watercourses which appear to drain the village and surrounding land to these Main Rivers. The Main Rivers have flood zones associated with them but the absence of flood zones for the ordinary watercourse does not mean that they do not have the potential to cause flooding. The extent of flood plains can be viewed in the 'What's in your Backyard?' section of the Environment Agency's website (www.environment-agency.gov.uk).	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Hope that any Neighbourhood Plan would consider the need not only that flood risk does not increase, but will seek to actively reduce flood risk and provide betterment wherever possible in line with paragraph 100 of National Planning Policy Framework (NPPF).	Noted	Inform the Town Council/ pass on representation

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	Environment Agency			Appropriate for a Neighbourhood Plan to investigate possibilities to enhance watercourse corridor biodiversity, as well as contribute to achieving WFD aims of improving the ecological status of the waterbody.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Although Environment Agency will remain concerned with flooding from Main Rivers, the Lead Local Flood Authority (LLFA) (in this case Northamptonshire County Council) is lead for local flood risk which includes groundwater, surface water and ordinary watercourses and should be included in any discussions. Further information about flood risk can be found in the Kettering and Wellingborough Strategic Flood Risk Assessment: http://www.wellingborough.gov.uk/downloads/download/2025/sfra_update_main_body .	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Works proposed to ordinary watercourses - Under terms of sections as commenced of the Flood & Water Management Act 2010, from 6 April 2012 the powers to consent works proposed on ordinary watercourses has transferred to the LLFA. In this case, the Bedford Group of Drainage Boards will be administering and determining such consents on behalf of the LLFA.	Noted. However, there are no IDBs covering East Northamptonshire.	No further action

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	Environment Agency			Works proposed to main rivers, functional flood plains or within 9m of the landward toe of the channel - Any proposed works affecting statutory main rivers or within the indicative floodplain or within the byelaw distance requires the prior written consent of the Environment Agency under the relevant statutory legislation and current land drainage byelaws. Please contact the Partnerships and Strategic Overview team on number 01536 385126 if further information is required.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Surface water drainage - Neighbourhood Plan is essentially placed to play a vital role in managing surface water runoff and reducing the risk of surface water flooding. This can be achieved through an understanding at a local level of existing surface water flooding issues and recommending action to alleviate or resolve these issues.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Neighbourhood Plan can actively promote sustainable methods of drainage that ensure surface water runoff does not increase as a result of new development. It is strongly recommended that the Plan includes strong support for Sustainable Drainage Systems (SuDS). These can achieve multiple environmental benefits not only by reducing flood risk from surface water, but also in areas such as biodiversity, amenity and water quality.	Noted	Inform the Town Council/ pass on representation

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	Environment Agency			Documents such as Ciria C697 (the SuDS Manual) and Part H of the Building Regulations 2000 can provide excellent reference points for determining a suitable working practice for surface water drainage considerations. It should be noted that any such recommendations within the Neighbourhood Plan must conform to and complement the requirements and aims of local planning policy, as well as the LLFA aims in respect of their role as SuDS Approval Body.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Groundwater and Contaminated Land - NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Rushden Parish overlies the Nene Mid Lower Jurassic Unit and Northampton Sands groundwater bodies. These groundwater bodies consist of the principal aquifer of the Blisworth Limestone and secondary A aquifers of the Northampton Sand, Cornbrash Formation and Kellaways Sand. These groundwater bodies have been designated by the WFD as drinking water protected areas, although there are currently no abstractions or Source Protection Zones within the Parish.	Noted	Inform the Town Council/ pass on representation

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	Environment Agency			Principal aquifers are geological strata that exhibit high permeability and provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. Secondary aquifers are often capable of supporting water supplies at a local scale and normally provide an important source of flow to some rivers. Due to the presence of these principal and secondary aquifers, parts of the area are vulnerable to pollution from certain types of development.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Unproductive strata are present in the north-west (Whitby Mudstone), south and south-eastern (Oxford Clay) parts of the Parish. In addition, superficial deposits of Boulder Clay are present over much of the eastern and southern parts of the parish. These are of relatively low permeability, so these may afford protection to more vulnerable underlying aquifers, where present.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Aware of the following historic landfill sites within Rushden Parish: Manor Park (NGR: SP 96400 65300). Received household waste until 1965; Wellingborough Road – privately owned tip (NGR: SP 94200 67400). Waste type unknown, understood to have ceased before 1972; EMGAS, Shirley Road (NGR: SP 95700 67400) - Received Inert waste, Category A, B & C waste until 1980.	Noted	Inform the Town Council/ pass on representation

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	Environment Agency			Recommend that developers - 1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination. 2. Refer to Environment Agency Guiding Principles for Land Contamination in order to assess risks to controlled waters from site. Local Authority can advise on risk to other receptors, such as human health. 3. Refer to Anglian River Basin Management Plan. 4. Refer to www.environment-agency.gov.uk for more information.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			EA able to provide further advice on protecting groundwater, including guidance on use of SuDS. Refer to groundwater policies in Groundwater Protection: Principles and Practice (GP3), available from website. This sets out position for a wide range of activities and developments including waste management discharge of liquid effluents, land contamination, ground source heat pumps, cemetery developments and drainage.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Piling or any other foundation designs / investigation boreholes / tunnel shafts / ground source heating and cooling systems using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater.	Noted	Inform the Town Council/ pass on representation

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	Environment Agency			Waste - Waste hierarchy – reduce, re-use, recycle, should be implemented when developing proposals within Rushden Parish. Community composting schemes and the necessary waste handling facilities could be developed as part of the essential infrastructure within the Parish.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Neighbourhood Plan should be based on a robust long term vision and a clear enough structure for development and change to help make it happen even with changes in political and economic conditions. We look forward to engagement with the Parish to tackle issues and achieve exemplar development wherever possible.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			Emphasise importance of early pre-application discussions on all proposals to ensure that any initial issues can be resolved and subsequent planning application run smoothly. As sites or more detailed area plans come forward, will provide more detailed comments. Early liaison - ensuring that schemes are enabled in a joined up way and avoid issues arising unexpectedly at advanced stages in the process.	Noted	Inform the Town Council/ pass on representation
	Environment Agency			New role to provide advice and support to businesses, public sector and other organisations to help them adapt to a changing climate. Help key sectors increase their resilience to climate risks/ working closely with Defra as part of Clime Ready – the Government’s national programme for adaptations, to help achieve this.	Noted	Inform the Town Council/ pass on representation

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	Environment Agency			Hope that Neighbourhood Plan in this area would encourage development that would address climate change. Welcome opportunity to provide early pre-application advice on future development.	Noted	Inform the Town Council/ pass on representation
11/10/2012	English Heritage	Email with letter attachment	Yes	Do not have any objections to the proposed designation	Noted	Inform the Town Council/ pass on representation
	English Heritage			English Heritage wishes to ensure that an understanding of the historic environment, including designated heritage assets and locally important assets, and the contribution that the historic environment makes to local character, is fully considered when Neighbourhood Plans are being prepared. Have a range of guidance which may be of assistance for the drafting of such plans: http://www.english-heritage.org.uk/caring/get-involved/improving-yourneighbourhood/	Noted	Inform the Town Council/ pass on representation
	English Heritage			Due to coalescence of Rushden with Higham Ferrers hope that emerging Neighbourhood Plan for Rushden considers its impact on Higham Ferrers (and vice versa). Both Rushden and Higham Ferrers contain important heritage assets, including conservation areas, listed buildings and scheduled monuments, with Chichele College in the guardianship of English Heritage.	Noted. As stated, Higham Ferrers Town Council is already preparing its own Neighbourhood Plan. For both Plans to be sound, these must (as far as possible) be in harmony with one another.	Inform the Town Council/ pass on representation

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	English Heritage			The boundary of Higham Ferrers Conservation Area lies a short distance from the boundary of the proposed Rushden Neighbourhood Area. There are, of course, heritage assets beyond the boundary of Rushden and Higham Ferrers which might be relevant depending on the emerging plan.	Noted	Inform the Town Council/ pass on representation
	English Heritage			English Heritage has statutory role in development plan process and there is a duty on either Local Planning Authority or Neighbourhood Planning Forum to consult English Heritage on any Neighbourhood Plan considered to be affected, as well as a duty to consult on Neighbourhood Development Orders and Community Right to Build Orders.	Noted	Inform the Town Council/ pass on representation
	English Heritage			Should a Strategic Environmental Assessment/ Sustainability Appraisal be required EH have a formal role in that process.	Noted	Inform the Town Council/ pass on representation
	English Heritage			English Heritage will target limited resources efficiently. Will directly advise on proposals with potential for major change to significant, nationally important heritage assets and their settings. May also be able to advise communities directly, subject to local priorities and capacity. As with proposed neighbourhood plans for Raunds, Oundle and Higham Ferrers, interested in consultation on Rushden plan.	Noted	Inform the Town Council/ pass on representation
	English Heritage			Grateful if a copy of this letter could be passed onto Rushden Town Council	Noted	Inform the Town Council/ pass on representation