Purpose of report

The purpose of this report is to recommend that consultation on Local Plan Part 2 alternative viable site allocations relating to the Rushden Growth Town, and on a specific Local Plan Part 2 policy for the Rushden East Sustainable Urban Extension, is undertaken in order to assess the most appropriate way for the council to meet its strategic housing requirements for the Rushden area. The report explains why further consultation is required, the timescales for this, and the further steps that will be necessary to prepare the East Northamptonshire Local Plan Part 2 for Submission to the Secretary of State for Examination in Public.

Attachment(s):

Appendix 1 - Assessment of Alternative Site Options - Rushden Growth Town

1.0 Background

1.1 A six week public consultation was undertaken from 10th February to 23rd March 2020 to seek views as to whether two potential site allocations should be included within the emerging Local Plan Part 2. The two potential site allocations were:

- A site for a new Special Educational Needs school at Higham Ferrers. This potential site allocation was non-contentious at consultation stage. There was a coterminous planning application and the council’s Planning Management Committee meeting on 10th June 2020, full planning permission was granted for this facility on the potential allocation site (19/02011/FUL).

- A site known as Rushden Lakes West, on land between the existing Rushden Lakes retail and leisure development and Ditchford Lane. It was proposed that this potential allocation site could accommodate some 450 dwellings, along with employment and other related uses. This would enable the council to meet its minimum housing requirements, as set out in the North Northamptonshire Joint Core Strategy (JCS) up to the end of the plan period at 2031.

1.2 This report focuses on the outcome and implications of the consultation process for the potential site allocation at Rushden Lakes West (RLW) for predominantly residential use. It also describes the proposed approach to including a new Rushden East Sustainable Urban Extension (SUE) policy within the Local Plan Part 2.
As part of the public consultation for the potential site allocation at RLW, both Natural England (NE) and the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire (WT) submitted objections in respect of the potential impact of residential and related development on the Upper Nene Gravel Pits Special Protection Area (SPA) and what they consider may constitute related Functionally Linked Land (FLL).

An SPA is the highest level European nature conservation designation, and the objections by NE and the WT specifically relate to the potential impact of new development at RLW on protected bird species which use the SPA. FLL is land which, whilst not within the designated SPA, is considered to be of importance to the lifestyle and health of the populations of protected bird species.

The NE objection, which was largely endorsed by the WT, can be summarised as follows:

- Insufficient evidence has been provided to properly assess the potential impact of the proposal on the SPA.
- The mitigation measures being relied on (i.e. those in the existing mitigation strategy) are not considered sufficient to mitigate the potential impacts of the development.
- Concerns about the location of the proposed housing within the site, its proximity to and potential impacts on the SPA.
- The potential site allocation is not consistent with the precautionary principle required by the Habitats Regulations which requires consideration of whether the potential impacts associated with it could be avoided through the promotion of other alternative viable site options.
- Further evidence and survey work is required before the potential site allocation can proceed to ensure the approach is compliant with the Habitat Regulations.

The implications of the NE and WT objections to the RLW potential site allocations were initially considered by the Planning Policy Committee (PPC) on 8th June 2020. It was resolved that further assessment work should be undertaken to inform the council’s approach to delivering future housing requirements within the Growth Town of Rushden. That work has included further assessment work, including the consideration of alternative sites to RLW, to identify a way forward for the Local Plan Part 2; and progression of the Rushden East SUE Masterplan, to enable a robust delivery trajectory to be set for the remainder of the Plan period.

Further Assessments and Associated Evidence on Potential Site Allocations

The essence of the objections from NE and the WT is that, due to the likely impacts on wildlife which uses the SPA and FLL, a development allocation at RLW should not proceed if there are any alternative viable sites which may be able to accommodate the JCS housing requirement of around 450 dwellings.

The following actions have been undertaken since the 8th June 2020 PPC meeting:

- Further assessments to consider the potential for alternative viable site proposals (other than RLW) around the Growth Town of Rushden, based on previous work considered by the PPC at its meeting on 17th December 2019 (agenda item 6). The current work assesses specific site proposals
on alternative sites, rather than the broad locations of search which were the basis of the previous assessments.

- Close working with NE and the promoters of RLW (The Crown Estate - TCE) to explore the potential for incorporating mitigation measures to minimise impacts on protected bird species, to protect the SPA, and to test whether such measures could resolve the objection from NE.

2.3 The key issues that need to be resolved about the potential site allocation at Rushden Lakes West are:

1. Is the RLW site considered to comprise FLL which provides a vital role in supporting the nature conservation objectives of the SPA and which, if developed, may affect the integrity of the SPA?

2. Will the development of the RLW site result in unacceptable recreational impacts on the SPA, especially from a new resident population?

3. Is the development of the RLW site acceptable given its close proximity to the SPA and would it lead to the potential “urbanisation” of the SPA area?

4. Are there alternative viable site proposals that can provide the 450 dwellings focused on the Growth Town of Rushden required by the JCS, without impacting unacceptably on the SPA?

These questions are addressed in paragraphs 2.5 to 2.26 of this report.

2.4 As part of the work to assess impacts on the SPA, the council has appointed environmental consultants AECOM to prepare an Appropriate Assessment to test whether any aspect of the emerging Local Plan Part 2, and specifically the RLW and other potential site allocations, are likely to have an adverse effect on the integrity of the SPA. An Appropriate Assessment is a necessary step where there is any prospect of impact on a SPA.

**Functionally Linked Land (FLL)**

2.5 TCE (the promoters of the RLW allocation) has produced an initial analysis of whether or not the RLW site constitutes FLL, and this has been considered both by the council and NE. In summary, NE has accepted that the proximity of RLW to the SPA does not necessarily mean that the site is FLL, but this is not as yet proven one way or another.

2.6 Whilst progress has been made, NE maintains significant concerns about TCE’s evidence and proposed mitigation of the potential impacts of development of the RLW site on the SPA (and nearby FLL). NE considers that pressure on the bird populations has not been sufficiently quantified and that TCE’s work does not address in sufficient detail the RLW site’s future prospects (as FLL) for supporting bird populations within the SPA.

2.7 In addition, NE is concerned that there has been a considerable amount of new development permitted close to the SPA in recent years (both by the Borough Council of Wellingborough and East Northamptonshire Council). NE considers that the potential allocation of further development land at the RLW site would add to the cumulative negative impacts on the populations of protected bird species.
which use the SPA.

**Recreational Impacts and Urbanisation of the SPA**

2.8 In respect of the recreational impact pressures of the RLW site on the SPA, TCE has engaged with NE to understand what scale of mitigation measures could be provided to help overcome this part of the objection.

2.9 This has resulted in TCE proposing a significant amendment to the potential site allocation, by reducing the proposed housing numbers from 450 dwellings to between some 320 and 350 dwellings. TCE’s revised proposal excludes a large area of land to the north of the proposed Ditchford Lane link road (which has planning permission and runs through the site to link with the Rushden Lakes retail and leisure area). Land to the south of the link road has been retained and the site promoters have proposed a revised scheme which could deliver up to 350 dwellings (with 30% affordable housing).

2.10 This is an important matter for the Local Plan Part 2, as the reduction of housing development capacity at the potential RLW site allocation would mean that land to accommodate the balance (at least 100 dwellings) would still need to be identified elsewhere, ideally in the Growth Town of Rushden.

2.11 A development of up to 350 dwellings on a site of circa 8.5 hectares would produce a relatively high overall housing density of 41 dwellings per hectare. Additional constraints may further limit the scale of development within the site. For example, the south-west corner of the site was previously proposed for employment purposes due to noise impact from the surrounding road network, but is now identified for housing.

2.12 TCE is investigating additional mitigation measures designed to restrict access to the SPA, informed by discussions with NE. These include removing direct footpath access into the SPA, creating an area of suitable alternative natural greenspace (SANG) north of the proposed link road, and introducing water features to restrict access into the SPA from RLW.

**Alternative Viable Sites**

2.13 The council has undertaken an assessment of alternative viable sites that may be suitable for meeting the JCS housing requirement (450 dwellings). This is required to ensure the council’s approach is consistent with the precautionary principle as part of the Habitats Regulations, and to ensure that it has properly considered whether the impacts of the potential site allocation at RLW could be avoided should other alternative viable sites exist that meet policy requirements.

2.14 The assessment work undertaken to inform the previous public consultation in respect of RLW (February / March 2020) included a number of areas of search for alternative sites. Whilst the evidence supported the decision to promote RLW at that time, the objection from NE requires the council to re-assess other potential alternative viable sites.

2.15 The assessment work has focused on the following site options around the designated Growth Town of Rushden. This detailed assessment of these sites is shown at Appendix 1:
1. Land to the south east of Rushden - northern option, immediately south of Newton Road.
2. Land south of Newton Road - linear infill.
3. Land to the south east of Rushden - southern option, east of the A6 / A5028 roundabout.
4. Land east of Rushden / Higham Ferrers - west of Slater's Lodge.

2.16 Officers have given careful consideration to each of the sites that have been assessed. All sites score relatively well within the assessments. However, it is considered that, on balance, the land south of Newton Road (site 3 - the southern option) is likely to provide a good alternative viable site allocation proposal to the RLW site. The other sites may well also be considered as alternative viable sites, but the land south of Newton Road is considered most favourably as it can deliver the JCS housing development requirement in a sustainable location. The site was promoted through the public consultation undertaken in February / March 2020. The additional assessment work has not revealed any known constraints, and it lies beyond the 3km SPA mitigation boundary.

2.17 NE has welcomed the council’s approach to assessing alternative viable site allocations, stating that:

“… whilst it is true to say that all the proposed alternative sites present some risk of recreational disturbance impacts to the SPA, as well as have the potential to be situated on FLL, we regard them as more suitable sites than those very close to the SPA”.

This indicates that all the potential alternative viable site proposals are likely to require some additional work to fully satisfy SPA mitigation measures.

2.18 Whilst this site was part of the previously assessed search area, it was not at that time considered preferable to RLW. The NE objection to RLW is, however, a significant material consideration. If a satisfactory alternative viable site to RLW can be identified, it should be taken forward - unless NE can be satisfied that the comprehensive mitigation measures and concerns raised in their representation about RLW can be satisfactorily addressed.

Appropriate Assessment

2.19 The Appropriate Assessment report referred to in paragraph 2.4 is ongoing for the Local Plan as a whole, but AECOM has concluded regarding RLW that:

'Recreational pressure

The site is well within the 3km zone, with the site boundary being 150m from the SPA and the nearest area of housing being 300m from the SPA and thus well within easy walking distance.

The proponent’s shadow HRA report identifies that approximately 330 residents of the development are likely to walk for recreation at least once a week with more than 100 likely to do so 5 times a week. Given the proximity of the housing to the SPA (within a c. 5-minute walk) and the high profile of that site it is very likely that these people would include the SPA in their walks. People who visit an SPA once a week or more have a disproportionate recreational pressure effect and a development is likely to have a much greater number of such residents if it is...
located very close to the SPA. According to the shadow HRA report the worst-case assessment has estimated that the development could result in an additional 3,095 visitor movements a month within the SPA and a worst-case 8% increase in annual visitor numbers. This is a very large increase from a single development.

The site promoter has produced a shadow HRA which addresses all the potential impacts of development including during construction. The nearest house site will be 300m from the SPA; AECOM’s experience of other construction sites and associated noise and lighting modelling considers that this is a sufficient distance that noise and lighting can be adequately mitigated.

The site promoter has produced a detailed recreational pressure mitigation strategy (contained within a shadow HRA report) to deliver SANG, increase accessibility of the wider area and enhance visitor management within the SPA. The promoter is in a fairly unique position to do this being also the landowner of this part of the SPA.

It is noted that the SANG is only 6ha in size. Experience elsewhere indicates that to adequately replicate the walking experience of using the SPA the minimum SANG size is 10ha as this is sufficiently large to accommodate a 3km circular walk (this being the typical walk length undertaken by users of the Upper Nene Valley Gravel Pits SPA).

AECOM considers that there is a reasonable prospect that the impacts of this development on the SPA could be mitigated with some further work such as expansion of the SANG. This is particularly because some of the measures being proposed for introduction within the SPA would have a high likelihood of being effective:

1. Permanent or seasonal closure of permissive paths in the most sensitive areas;
2. Diversion of existing the Public Right of Way (PROW) and some permissive paths to guide existing access away from sensitive areas (e.g. where there may be grazing cattle or concentrations of wintering birds);
3. Installation of locked gates with access into some areas limited to authorised groups/individuals (e.g. the angling club);
4. New boundary/stock fencing at appropriate locations around Ditchford Reserve (e.g. to prevent conflict between grazing animals and dogs);
5. Screens and viewing points at sensitive locations e.g. along appropriate sections of the northern shore of lake L3.
6. Closure of the existing car park on Ditchford Road to unauthorised users

For example, winter closure of footpaths within the Rushden Lakes part of the SPA would be extremely effective in controlling disturbance. Some of these measures fall within the broad list identified in the SPD (‘Fencing throughout to keep people on paths, Interpretation, Wardening, Re-route footpaths away from sensitive areas, Promote Rushden Hall Park as local off-lead area (e.g. in new home packs’). It would need to be clarified whether any of these measures are already effectively funded through the SPD Mitigation Strategy.

At the same time, the very close proximity of this site to the SPA inevitably means that considerably greater effort will be required to manage the visitor impact of this site than would be the case with the other sites which are considerably further from the SPA.
**Functionally-linked land**

Based on detailed work undertaken by the site promoter and advice from local ornithological experts, AECOM indicate there is no reason to conclude that this site constitutes significant functionally-linked land for any SPA/Ramsar birds.

**Conclusion**

Based on the detailed information submitted by the site promoter, AECOM’s professional judgment is that the recreational pressure issues on the SPA are likely to ultimately be resolvable, particularly due to the proposed measures to control access within the SPA, and the unique position of the site promoter as landowner. However, the site location very close to the SPA inevitably means that greater effort (in terms of mitigation) will be required to ensure this site is deliverable without an adverse effect on SPA integrity due to recreational pressure than is the case for any of the other alternatives. This is illustrated by the extensive package of initiatives contained in the promoter’s proposals. Since any mitigation strategy carries some level of residual risk (as absolute certainty can never be provided) it follows that the risk is lower with sites more distant from the SPA.

Additionally, Natural England have made it clear that they have an ‘in principle’ objection to this development site due to its extreme proximity to the SPA and the risk it creates of setting a precedent for residential development very close to the SPA in future plans. No amount of mitigation can address an ‘in principle’ objection and there is thus a high risk that Natural England will sustain their objection. This does reflect a general stance taken by that agency regarding development around SPAs elsewhere in the country. In some parts of the UK net new housing development is generally not permitted at all within 400m of European sites, although that is based upon sites with very different interest features (e.g. heathland at great risk of fire, and very rare ground-nesting birds). While Natural England have no right of veto regarding Local Plans and European sites, a continued objection from Natural England going into Examination does pose a significant risk that the Inspector may consider the allocation of Rushden Lakes West to be unsound. In AECOM’s experience of many Local Plan Examinations, Planning Inspectors tend to give considerable weight to Natural England objections to site allocations when these are driven by European site concerns. While this may not entirely derail the plan, it risks delaying its progress through Examination to adoption.

For these reasons, Rushden Lakes West is less favourable than the other sites from an HRA point of view. However, since the HRA issues are likely to be resolvable it may prove a suitable site for longer term development outside the time pressure of the Local Plan progress to adoption.

2.20 With regard to land south of Newton Road (site 3 - the southern option) the assessment concludes that:

‘The site is located 3.5 to 3.6km from the SPA at its closest and 4km away at its most distant. It is thus outside the 3km zone for recreational pressure. Following the Mitigation SPD strictly, this site should not therefore need to deliver mitigation for recreational pressure. However, noting Natural England’s comments it seems probable that mitigation (potentially in the form of a SANG) would be needed. The
The site is 22.6ha in size. At 35 dwellings per hectare, 13 hectares of the site would be needed to accommodate 450 dwellings. This would leave just under 10 hectares available to deliver a SANG. This is relevant because experience elsewhere indicates that 10ha is the typical minimum size for an effective SANG, irrespective of the size of the population it intends to serve.

The site is a mix of arable and pasture, quite large, has fairly good sightlines. Possible that it could constitute functionally-linked habitat for the SPA. Further analysis is underway including obtaining information from the local Biological Records Centre.

The principal advantage of this site over any of the others is that it lies furthest from the SPA. As such the contribution of 450 dwellings on this site to recreational pressure is likely to be much smaller than for a site located closer to the SPA and mitigation in the form of SANG is more likely to be effective. Moreover, the site appears to be large enough to deliver a SANG if one was required, although slightly more land may be needed to accommodate a 10ha SANG alongside other uses.

Current Position

2.21 The additional work undertaken on RLW and the potential alternative viable sites has provided greater clarity both in respect of understanding mitigation requirements and assessing viable site alternatives.

2.22 However, the mitigation requirements in relation to the impacts on the SPA are complex. It is clear from discussions with NE and TCE that it will not be possible to resolve all requirements that would remove the NE and WT objections to the RLW site in the timeframe available to allow the Local Plan Part 2 to be submitted to the Planning Inspectorate. This is a major risk on the timely progress of the Local Plan Part 2.

2.23 It was originally envisaged that the Local Plan Part 2, including the potential site allocation at RLW, would be able to be ‘Submitted’ by the end of 2020. However, the additional evidence and timescales for undertaking protected bird species survey work required to fully establish the impact of a potential site allocation at RLW on the SPA mean that the Local Plan Part 2 would not be submitted in advance of the establishment of the North Northamptonshire unitary authority on 1st April 2021.

2.24 It is also uncertain whether NE would ultimately remove its objection, even after that work has been completed, given the concerns raised about the proximity of RLW to the SPA, and the identification of a potential alternative viable site which could deliver the JCS housing requirement with lesser impact on the SPA.

2.25 If NE’s objection to the potential site allocation at RLW is not removed, even after taking into account additional mitigation measures proposed, there remains a significant risk to the Local Plan Part 2 at Examination, which may result in the plan being found unsound. This is likely to be accentuated if alternative viable sites are available.

2.26 It appears highly unlikely that NE’s objection to the potential site allocation at RLW will be lifted. It is considered that this is a significant risk to the successful progression of the Local Plan Part 2 through the submission and Examination
Summary

2.27 In summary, as described in paragraphs 2.5 to 2.26 of this report, the responses to the issues posed in questions 1 to 4 at paragraph 2.3 are as follows:

**Question 1:** Is the RLW site considered to comprise FLL which provides a vital role in supporting the nature conservation objectives of the SPA and which, if developed, may affect the integrity of the SPA?

**Response:** The RLW may constitute FLL but this is not as yet able to be fully established as further survey work is required to establish this. The survey work will take time to complete and analyse, not least because it would need to be undertaken over the winter months.

**Question 2:** Will the development of the RLW site result in unacceptable recreational impacts on the SPA, especially from a new resident population?

**Response:** Whilst the promoters of the RLW site continue to explore ways of mitigating unacceptable recreational impacts on the SPA this work will take time to complete and agree with NE. As such the answer to this question is as yet unknown.

**Question 3:** Is the development of the RLW site acceptable given its close proximity to the SPA and would it lead to the potential “urbanisation” of the SPA area?

**Response:** The development of the RLW site is unlikely to be acceptable given its close proximity to the SPA, given the current objection from NE and the WT. NE’s position is that if there are alternative viable sites that could be developed further away from the SPA, then these should be assessed and given preference as potential site allocations. NE’s view remains that the development of the RLW site could lead to the potential urbanisation of the SPA area, especially when taken cumulatively with previous planning permissions in the area.

**Question 4:** Are there alternative viable site proposals that can provide the 450 dwellings focused on the Growth Town of Rushden required by the JCS, without impacting unacceptably on the SPA?

**Response:** Alternative viable sites, including a most favourable site, which meet the requirements in question 4 have been assessed and are available.

3.0 Rushden East Sustainable Urban Extension

3.1 Legal advice has been sought on the status of the Rushden East Sustainable Urban Extension (SUE) Masterplan Framework Document (MFD). The MFD was subject to public consultation in February / March 2020 (at the same time as the potential site allocations for the Special Educational Needs School and the RLW site).

3.2 The legal advice has identified an option to incorporate the MFD into the Local Plan Part 2. The format envisaged for this is to prepare a freestanding policy within the Local Plan Part 2 which describes the council’s intentions for the
planning of the SUE, with the MFD (revised as a result of the representations submitted during the consultation in February / March 2020) incorporated into the Local Plan Part 2 as an appendix.

3.3 This approach would give the MFD the ‘weight’ required to manage the implementation of the SUE development through and beyond the plan period of the Local Plan Part 2. It is proposed that the new SUE chapter and the MFD appendix would be subject to public consultation at the same time as the potential alternative viable site as described in section 2.0 of this report.

4.0 Options for Taking the Local Plan Forward

4.1 Given the above there are three main issues to consider:

1. To acknowledge that the level of evidence required to support the promotion of land at RLW would require the Local Plan Part 2 timetable to be further extended to assess whether the objection is capable of being removed. The time required to enable this could be extensive and is likely to continue significantly beyond the transition to the new North Northamptonshire unitary authority on 1st April 2021.

2. To acknowledge that alternative viable sites have been assessed to the east of the Growth Town of Rushden, and that a favourable site has been identified at land to the south of Newton Road, Rushden (site 3 - the southern option) which can provide the opportunity to meet the identified JCS housing requirements up to 2031. Subject to public consultation, this would allow the submission of the Local Plan Part 2 to take place in the New Year, before 31st March 2021.

3. To recognise that a new policy on the Rushden East SUE within the Local Plan Part 2 would give weight to the MFD in guiding the planning and implementation of development of the SUE through and beyond the Local Plan Part 2 plan period.

4.2 In respect of issue 1 above, there are no guarantees that the objection from NE would be removed from the RLW site even after the additional work envisaged. Indeed the recent responses to the evidence prepared suggests this to be extremely unlikely in the short term, and at best, uncertain in the medium / longer term. Further, whilst it is understood that this option would require a delay to the submission of the Local Plan Part 2 it is not clear how long a delay this would require. If additional survey work is required, as raised in the NE response, it would need to take place over the winter months (October - March), followed by an assessment of the evidence produced. This would extend the Local Plan Part 2 submission timetable by at least 6 to 12 months.

4.3 In addition, the amended proposal by TCE, in response to the NE objection, reduces the housing development numbers at RLW from 450 dwellings to between 320 and 350 dwellings, and so would not provide the quantum of development required to meet the Local Plan Part 2 housing requirements. A balance of around 100 to 150 houses would need to be allocated elsewhere around Rushden as the designated Growth Town.

4.4 Further, the conclusions of the Appropriate Assessment state that:
Based on the detailed information submitted by the site promoter, AECOM’s professional judgment is that the recreational pressure issues on the SPA are likely to ultimately be resolvable, particularly due to the proposed measures within the SPA and the unique position of the site promoter as landowner. However, the site location very close to the SPA inevitably means that greater effort (in terms of mitigation) will be required to ensure this site is deliverable without an adverse effect on SPA integrity due to recreational pressure than is the case for any of the other alternatives. This is illustrated by the extensive package of initiatives contained in the promoter’s proposals. Since any mitigation strategy carries some level of residual risk (as absolute certainty can never be provided) it follows that the risk is lower with sites more distant from the SPA.

The immediate proximity of the RLW site to the SPA is such that it is difficult to put into place a range of mitigation measures to satisfy the precautionary principle; i.e. remove any potential significant risk to the integrity of the SPA.

There is potential for an alternative viable site allocation to deliver the total quantum of housing required, at land to the south of Newton Road, Rushden. Recent consultation reveals no known constraints, though, as indicated in this report, NE has indicated that suitable mitigation measures would be required, including the need to consider the potential for FLL. The proposal lies beyond the 3km SPA boundary and NE has indicated the proposal as a more suitable site than the RLW site.

In light of the above, officers recommend that public consultation should now take place on the alternative viable site, to ensure that a robust Local Plan Part 2 is able to be submitted in a timely manner for examination. This would provide the opportunity for the additional evidence to be provided in support of the proposal for land south of Newton Road.

A six week public consultation would take place following the completion of the PPC meeting, to allow the Local Plan Part 2 to be reported for pre-submission in January 2021. Whilst this extends the time taken to submit the Local Plan Part 2 for Examination it would constitute a much shorter delay than would be the case if the council chose to proceed with the RLW site allocation. It would provide a more robust approach at Examination, significantly reducing the probability of the Local Plan Part 2 being found unsound.

Whilst the council is not required by law to undertake additional consultation, and could progress straight to pre-submission in the Autumn this is not recommended. In respect of RLW, too much uncertainty remains and the potential for the Local Plan Part 2 being found unsound would be significant. In respect of a further public consultation on the alternative viable site, this would provide an opportunity for evidence requested by NE to be addressed.

Proceeding with the public consultation on the alternative viable site, and the proposed new Rushden East SUE policy, would enable the Local Plan Part 2 to be submitted to the Secretary of State in the New Year (2021) in advance of the new North Northamptonshire unitary authority commencing on 1st April 2021.

The anticipated revised timetable for the Local Plan Part 2 would be as follows:

- October / November 2020 – Focused changes / site allocations / Rushden East SUE policy public consultation;
December 2020 – Planning Policy Committee – Reporting outcome of public consultation process, and approval of Pre-Submission Draft Local Plan Part 2 for Regulation 19 consultation and subsequent submission to the Secretary of State;

January – February 2021 – Pre-submission Draft (Regulation 19) consultation;

February / March 2021 – Submission of Local Plan Part 2 to Secretary of State.

5.0 Equality and Diversity Implications

5.1 The preparation of the Local Plan Part 2 requires an Equality Impact Assessment to fully consider the impact of its policy proposals and land use allocations. This will be submitted to the Secretary of State as part of the evidence base for the Local Plan examination.

6.0 Privacy Impact Implications

6.1 All representations submitted to the draft Local Plan Part 2 consultation are redacted to ensure any personal details are removed for publication on the Council’s website and subsequent Committee reports.

7.0 Health Impact Assessments

7.1 A health impact assessment has not been carried out. The impact on health and wellbeing is considered as part of the Sustainability Appraisal (statutory assessment of plan policy) which supports the emerging Local Plan.

8.0 Legal Implications

8.1 The preparation of a Local Plan must meet legislative requirements, which form part of the test of soundness of a plan at Examination. There are also legal implications arising from the legislative requirements referred to in the body of the report. The Council has appointed legal support to assist in addressing issues raised.

9.0 Risk Management

9.1 The main risks in preparing the Local Plan Part 2 are:

- Maintaining progress to ensure that key stages are met to enable the Local Plan Part 2 to proceed as efficiently as possible to Examination and adoption.
- Ensuring the availability of sufficient resources to allow the preparation process to proceed in line with the Local Development Scheme.
- Ensure that the Local Plan Part 2 satisfies the tests of examination, namely that significant changes provide the opportunity for public consultation and that the Plan has been positively prepared is justified, effective and is consistent with national policy.

9.2 To help monitor ongoing Local Plan Part 2 progress, and to help inform decision making a comprehensive risk register and project plan are maintained by the Planning Policy Manager as part of this project.
Resource and Financial Implications

In addition to staffing costs, the main costs in the preparation of the Local Plan Part 2 relate to the completion of the evidence base and funding the independent examination process, which is undertaken by the Planning Inspectorate and supported by a programme officer.

The cost of producing the evidence base is covered by existing budget. Provision of approximately £75,000 to £100,000 is now expected to be required in the financial year 2020 / 21 for the cost of the Examination process. An estimated cost of £80,000 was factored into the 2019 / 20 budget, as approved by Council on 4th March 2019 (Item 7b, Revenue Budget Changes 2019 / 20).

The budget of £80,000 for the Local Plan Part 2 examination was allocated based on the project timetable in an earlier Local Development Scheme (approved by the Planning Policy Committee, 30th July 2018); whereby the Local Plan 2 would be examined by a Planning Inspector during Summer/ Autumn 2019. The carry forward request and formal approval was resolved as part of the financial outturn report in April / May 2020.

Constitutional Implications

None.

Implications for our Customers

The submission and adoption of the Local Plan Part 2 will ensure that the council will have a clear up to date statutory planning policy framework to inform decisions on future planning applications, which take account of the needs of local communities, particularly in respect of addressing housing, employment and community infrastructure needs. It would also help improve the quality of future planning permissions by ensuring that planning policies reflect both national guidance and reflect local aspirations.

Corporate Outcomes

Preparation of the Local Plan Part 2 will, in particular, deliver the following Corporate Plan objectives:

- Good Quality of Life – Maintenance or enhancement of health and wellbeing through sustainable development through, for example, adopting policies relating to green infrastructure and design.
- Effective Partnership Working – The Local Plan Part 2 preparation involves close partnership working with a wide variety of stakeholders, including public consultation, to inform policy development.
- Effective Management – Fulfilling legal requirements and maximising the effectiveness of the planning service.

Recommendation

The Committee is recommended to:

1. Approve the site on land to the south of Newton Road, Rushden as an alternative viable site in place of the potential site allocation at
Rushden Lakes West.

(2) Agree to undertake a six week public consultation period on the proposal to allocate land to the south of Newton Road, Rushden to meet the strategic requirements for future housing provision.

(3) Agree to the inclusion of a Local Plan Part 2 chapter on the Rushden East Sustainable Urban Extension, and to undertake a six week public consultation on this.

(4) Approve amendments to the Local Development Scheme to reflect the change to the Local Plan Part 2 timescale.

(5) Delegate the detailed wording related to all elements of the proposed public consultation on the alternative viable sites and Rushden East SUE policy to the Head of Planning Services in consultation with the Chair and Deputy Chair of the Planning Policy Committee.

(Reason - To enable the progression of the Local Plan Part 2 leading to its submission to the Secretary of State, as a Corporate Priority)

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<td>Background Papers:</td>
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</tr>
<tr>
<td>Person Originating Report:</td>
<td>Richard Palmer Planning Policy Manager  01832 742142 <a href="mailto:rpalmer@east-northamptonshire.gov.uk">rpalmer@east-northamptonshire.gov.uk</a></td>
</tr>
<tr>
<td>Date:</td>
<td>1/9/2020</td>
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<td>CFO</td>
<td>MO (deputy) 9.9.20</td>
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## Assessment of Sites

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### Appendix:

1. Site assessment template
2. Detailed site by site assessments
3. Summary site assessment matrix
4. Numerical site assessment (by ranking)
1.0 Policy background and introduction

1.1 The National Planning Policy Framework (NPPF), sets out the Government’s planning policies which must be taken into account in preparing a Development Plan. It indicates that the purpose of the planning system is to contribute to the achievement of sustainable development as defined by the range of policies in the NPPF taken as a whole. To boost the supply of housing, the NPPF requires local planning authorities to identify key sites which are critical to the delivery of the housing strategy over the plan period.

1.2 The location and scale of potential housing sites is determined by the spatial strategy and distribution of development, which is set out in the North Northamptonshire Joint Core Strategy (JCS). In this document, the strategic housing requirements are broken down to indicate the scale of growth to be provided for each of the four partner Local Authority areas that it covers. Policy 29 of the JCS then identifies how much housing needs to be provided over the time period 2011 to 2031.

1.3 To ensure that future development is sustainable the JCS seeks to set out minimum requirements for housing delivery in the larger settlements of each Local Authority area, where transport and service are generally more accessible. These settlements are defined as Growth and Market Towns, with the former providing the focus for future housing delivery. In East Northamptonshire District, Rushden is defined as a Growth Town, whilst the settlements of Irthlingborough, Higham Ferrers, Raunds, Thrapston and Oundle are classified as Market Towns. Beyond these named settlements the remainder of the District is classified as rural, and will aim to contribute towards the rural housing allocation figure.

1.4 The draft East Northamptonshire Local Plan Part 2 is required to meet any shortfalls in the strategic allocations set out in the Joint Core Strategy. As a result, the amount of housing being provided is regularly monitored to identify the housing requirement completion rates and any issues arising. This paper explains the process for determining where additional housing sites could be allocated in the Local Plan Part 2, in order to ensure that the Local Plan housing requirements (JCS policies 28/ 29 and tables 4/ 5) can be met within the current Plan period (by 2031).

1.5 It is essential that site allocation decisions can be justified and that they are supported by a clear audit trail. This assessment has been designed to take account of both local and national planning policy guidance, to provide a framework that enables sites to be compared against each other on a consistent basis and to be transparent so that the reader can see how a particular outcome has been arrived at. This is to ensure that future development is sustainable and deliverable.

1.6 This assessment will form a key component of the evidence base underpinning the proposed allocations in the East Northamptonshire Local Plan.
2.0 Housing land supply, as at 1\textsuperscript{st} April 2019

2.1 The latest (2019) monitoring information shows that the settlements of Higham Ferrers, Raunds and Thrapston have sufficient deliverable sites to meet their share of the total growth distributed by the JCS over the plan period. Indeed, recent monitoring has show all three of these settlements are already (as at 1 April 2019) showing a projected surplus in completions plus housing land supply, compared to those JCS requirements.

2.2 Three housing site allocations at Oundle are proposed in order to deliver circa 300 dwellings within the current Plan period (to 2031) and thereby meet the minimum JCS requirements for the town. These proposed site allocations were confirmed by the Planning Policy Committee on 20\textsuperscript{th} January 2020, with two of the three (permitted for a total of 260 dwellings) subsequently granted planning permission.

2.3 Existing commitments in respect of Rushden and Irthlingborough previously indicated that these settlements were meeting their share of the housing growth (JCS Policy 29/ Table 5: 3,285 and 1,350 dwellings respectively), where the gross capacity of the Rushden East and Irthlingborough West sustainable urban extensions are counted (JCS Annex A: 1,600 and 700 dwellings respectively anticipated to come forward during the Plan period). However, more recent analysis identifies that an increasing amount of development identified to take place within these two towns is likely to occur beyond the end of the Plan period (and thus not contribute to meeting the need identified over the plan period). As at 1\textsuperscript{st} April 2019, the resulting potential housing shortfalls in the plan period were identified as follows (updated housing land supply Annual Position Statement agreed by Planning Policy Committee, 8\textsuperscript{th} June 2020, Item 10\textsuperscript{1}):

- Rushden – 306\textsuperscript{2} dwellings.
- Irthlingborough – 323 dwellings.

2.4 The potential for shortfall has been identified largely as a consequence of the ongoing challenges and uncertainties regarding the delivery trajectories for the two sustainable urban extensions (SUEs) at Rushden East and Irthlingborough West, where a larger proportion of the planned development is expected to be delivered beyond the plan period (i.e. after 2031). The total shortfall (629 dwellings) for Rushden and Irthlingborough emphasizes the need to make provision for additional housing delivery to ensure that the minimum housing requirement figures are met within the District within the plan period up to 2031.

2.5 The shortfall indicated above, in respect of Rushden and Irthlingborough, needs to be considered in context. It is recognised that Higham Ferrers has provided an increased housing land supply than originally planned (in particular, by way of the Federal Estates redevelopment proposals; draft Local Plan Part 2, Policy EN37), which helps to offset the identified deficit. Taking into account this

\textsuperscript{1} https://www.east-northamptonshire.gov.uk/meetings/meeting/1062/planning_policy_committee

\textsuperscript{2} Residual Rushden requirement increased by 50 dwellings, due to capacity reduction at Manor Park, Bedford Road (Rushden Neighbourhood Plan housing land allocation), from 200 down to 150 dwellings.
“overprovision” at Higham Ferrers (currently 244 dwellings) the net deficit is reduced to 385 dwellings.

2.6 Nevertheless, ongoing challenges in bringing forward the larger, strategic developments at Rushden and Irthlingborough have, in recent years, led to a revision in the housing trajectory which has resulted in an increasingly higher proportion of those developments anticipated as being delivered beyond the end of the Plan period (post-2031). Should this continue with future housing projections there is a clear risk that, whilst new housing development elsewhere in the District (including windfall development) is helping to offset the impact, the deficit from the strategic developments may continue to impact on meeting the overall housing requirements within the plan period (and thus on the soundness of the plan)

2.7 Housing requirements for the District are set out in Policy 28 of the JCS (8400 dwellings up to 2031), these represent the minimum requirements to be achieved within the Plan period. Failure to meet this requirement may lead to future challenges in respect of speculative planning applications. Furthermore, whilst the Authority can presently demonstrate a 5 year housing land supply, as required by national policy, and the latest (2019) figure has been calculated to be 6.16 years (as at 1st April 2019), the situation may become vulnerable in the medium term should further delays to the strategic sites occur.

2.8 As indicated above housing requirements are expressed as a minimum delivery figure. The deficit is not a static figure and will fluctuate depending on future housing delivery. Therefore meeting what can be expressed as the lower range of a potential deficit (currently 385 dwellings) is not recommended. A more robust approach, to ensure that the Authority continues to provide sufficient housing provision within the Plan period, is to consider a higher level of development that provides some headroom. A quantum of between 400 and 450 dwellings is therefore proposed to ensure a robust approach to ensuring future housing delivery.

2.9 The JCS explains how the urban area requirements should be applied to the Local Plan Part 2. This allows for some offsetting of housing delivery between Rushden, Higham Ferrers, Irthlingborough and Raunds (the “Four Towns”); whereby the Local Plan Part 2 “may assess higher levels of housing provision at individual settlements where this...would meet a shortfall in deliverable sites at another settlement within the same Part 2 Local Plan area (...in the case of East Northamptonshire, the Four Towns and RNOT areas)” (paragraph 9.10). This allows for some offsetting of housing requirements between the Four Towns, for the south of the District. Nonetheless, Rushden, as the identified Growth Town in the district, should remain the focus for any additional allocations to meet this ‘shortfall’.

2.10 A net delivery figure below 500 dwellings is not identified to be of a strategic level, which would need to be addressed through the review of the strategic plan (the JCS). Therefore it will need to be addressed through the emerging draft of the East Northamptonshire Local Plan Part 2.
3.0 **Need for further housing site allocations in the Local Plan Part 2, to offset the Rushden and Irthlingborough shortfalls**

3.1 A report considered by the Planning Policy Committee, at its meeting held on 30th September 2019, recognised the need to allocate additional housing land in the Local Plan Part 2 in order to address the situation outlined above. Following this, the Council considered potential development land options at Rushden and Irthlingborough, with a view to allocating further development land to address the respective housing supply shortfalls at these two towns (Planning Policy Committee, 17th December 2019, Item 6). The Committee resolved that a proposed housing allocation at Rushden Lakes West be supported as the Council’s preferred location.

3.2 Consultation upon the Rushden Lakes West proposal took place between 10th February and 23rd March 2020, inclusive. Natural England and the Local Wildlife Trust objected to the Rushden Lakes West proposal. These objections are summarised as follows:

- Sufficient evidence has not been provided to properly assess the impacts of the proposal on the Nene Valley Gravel Pits Special Protection Area.
- Natural England disagrees with the conclusions of the environmental assessment as outlined in Appendix 3, Site Assessment Matrix of the 17th December 2019 Planning Policy Committee Report,
- The mitigation measures being relied on (i.e those outlined in the existing mitigation strategy) are not deemed sufficient to mitigate the impacts of the development
- It is not just the number of houses which needs to be considered but the location of the housing and its proximity to the SPA.
- The approach is not consistent with the precautionary principle required by the Habitats Regulations as the approach to date has not properly considered whether this allocation, and the impacts associated with it, could be avoided. Natural England has asserted that there are other viable options which have been discounted.
- Further evidence and survey work is required before the site can be allocated in a way that would be compliant with the Habitats Regulations.

3.3 The representations submitted by Natural England and the Wildlife Trust raise significant issues of concern that need to be fully understood and evidence provided to help determine whether those issues can be satisfactorily mitigated. Part of the evidence required to address the concerns of Natural England, concerns the potential for there to be any other viable alternative sites. This is

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3 [https://www.east-northamptonshire.gov.uk/meetings/meeting/1023/planning_policy_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/1023/planning_policy_committee)
referred to as part of the precautionary principle and is part of the legislative requirements which need to be satisfied in reaching a preferred site allocation.

3.4 Overall, Natural England and the Wildlife Trust emphasise that “sites immediately adjacent to the SPA present the greatest concern given that they will be in easy walking distance to sensitive locations used by the SPA birds” (Natural England, 19 March 2020). This issue is particularly pertinent in the case of Rushden Lakes West, due to its immediate proximity to the SPA/Ramsar site. Similarly, Natural England remains concerned about the increasing urbanisation of land adjacent to the designated SPA/Ramsar site.

3.5 This assessment of viable alternative options therefore considers those suitable sites that could be delivered within the Plan period, in a scenario that Rushden Lakes West proves presently to be undevelopable due to its proximity to the Upper Nene Valley Gravel Pits SPA/Ramsar site and/or its likely implications for that SPA.

4.0 Area of search – alternative development land options

4.1 The assessment of alternative site options is intended to offset anticipated housing delivery shortfalls, in the plan period at Rushden and Irthlingborough, for the reasons indicated in this report. The Planning Policy Committee agreed, on 8th June 2020, to:

“Approve further assessment work, focussed on the designated Growth Town of Rushden and including Rushden Lakes West (as set out in the body of the report), to provide robust evidence to inform the Council’s approach to delivering future housing requirements in support of a pre-submission plan” (Item 7, paragraph 14.1(2)).

4.2 The resolution of the Planning Policy Committee reiterates that Rushden Lakes West remained the Council’s preferred allocation; a situation borne out by the earlier site assessment work (November 2019). However, to address the objection raised by Natural England the Planning Policy Committee resolved that an assessment of potential alternative proposals to Rushden Lakes West be undertaken, and that the assessment should be focused in/around the Rushden urban area, as the District’s designated Growth Town.

4.3 This assessment has been undertaken on the basis of a scenario where Rushden Lakes West is entirely excluded from the housing land supply. An alternative scenario may be for part of Rushden Lakes West to be allocated for residential development, plus a smaller site allocation to the east of Rushden. For the purposes of this assessment, this approach has been discounted, due to the continued uncertainties that Natural England’s objections to the Rushden Lakes west site could be overcome. On the assumption that Rushden Lakes West should be entirely discounted, potential alternative sites are identified in two broad locations.

• Land to the east of Higham Ferrers; and
• Land to the south east of Rushden.

5.0 Methodology for site assessment

5.1 This section of the report details the methodology for assessing these alternative development options. It sets out a three-stage process, setting out the context which has led to a potential shortlist of options:

• 1st stage assessment: Initial screening;
• 2nd stage assessment: Detailed site analysis; and
• 3rd stage assessment: Ranking of assessed sites.

1st stage assessment: Initial screening

5.2 The previous (strategic) assessment informed the proposed allocation of Rushden Lakes West. Building upon this approach for assessing strategic sites (also used for the JCS), the draft Local Plan is similarly required to consider all reasonable site alternatives. This took into account the promotion of sites from the Strategic Housing Land Availability Assessment (SHLAA), a technical study that seeks to identify sites with the potential for housing. The most recent SHLAA was published in May 2013.

5.3 The SHLAA is supported by subsequent calls for sites (e.g. January – March 2017; November 2019) and the Council’s online site submission form. Furthermore, any other alternative sites promoted directly through the preparation of the draft Local Plan were also taken into account. Sites from these sources combined, provided a long list of potential housing sites for consideration, which informed the earlier (November 2019) site assessment.

5.4 Key stages to the methodology are as follows:

1. Initial site sieve intended to filter out sites which are unsuitable for allocation – This process was undertaken as part of the earlier site assessment (November 2019). As part of the first stage, in line with Policy 29 of the JCS, it was accepted that a strong focus for new housing development should be within the Growth Town, followed by the Market Towns from the A14 south (including Thrapston).

2. Detailed assessment of shortlisted sites, to provide an objective comparison between individual sites.

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9 [https://www.east-northamptonshire.gov.uk/callforsites](https://www.east-northamptonshire.gov.uk/callforsites)
10 Planning Policy Committee, 17th December 2019, Item 6: [https://www.east-northamptonshire.gov.uk/meetings/meeting/1023/planning_policy_committee](https://www.east-northamptonshire.gov.uk/meetings/meeting/1023/planning_policy_committee)
3. Ranking of potential sites, in order to identify and recommend a preferred site for meeting the identified shortfall in housing need.

5.5 As noted above, in East Northamptonshire District, the only Growth Town identified is Rushden. In accordance with the JCS, Growth Towns are to be the main focus for new housing. Furthermore, Rushden itself is also a location where a significant part of the housing shortfall has been identified, predominantly due to ongoing uncertainties regarding the timely delivery of housing at Rushden East. Accordingly, potential sites in Rushden provided the focus for meeting the shortfall. While the additional housing will also be required to meet any potential shortfall arising from uncertainties around the delivery trajectory for Irthlingborough West, it should be noted that the JCS provides a clear spatial policy direction that additional growth should initially consider opportunities associated with Rushden as indicated above.

2nd stage assessment: detailed site by site analysis

5.6 Given the context set out above, this report now focuses upon the second stage assessment; which provides a short list of alternative site options, around the Growth Town, that could be considered as part of the requirements to respond to the Natural England objection. This builds on the previous assessment work (November 2019) that looked at broad directions of growth and provides a focus upon the potential for any viable alternative site allocations to address the anticipated housing shortfall within the Rushden area of the District.

5.7 The second stage assessment provides for a detailed site analysis, using a matrix linked to the Sustainability Appraisal (SA) objectives of the Local Plan. The matrix, included at Appendix 2, includes a range of decision making criteria against which alternative development proposals can be assessed. The range of criteria used in the assessment are not intended to exhaustive, but focus upon those criteria that enable meaningful comparison of potential impacts and/or the relative merits of alternative site proposals. The criteria include environmental constraints; accessibility to services; infrastructure capacity; and the availability and deliverability of sites.

5.8 In June/July 2020, officers undertook an initial site survey/appraisal for sites to the east of the Rushden urban area, considering key features and development constraints around the town. This process considered the following matters:

- Site specific development constraints;
- Potential site access arrangements;
- Site topographies.

5.9 These officer assessments were followed by engagement with key stakeholders; statutory consultees (e.g. County Council (Highways, Archaeology, Lead Local Flood Authority), Environment Agency, Natural England), and landowners/promoters of the sites. Feedback from these was received during July/August 2020 and is summarised in each of the site assessments at Appendix 2 (below).
5.10 Potential development options were considered on the basis of allocating land with a capacity for around 450 dwellings, as an alternative to the preferred allocation at Rushden Lakes West. In a scenario that some residential development could be delivered at Rushden Lakes (potentially up to 350 dwellings, if Natural England’s objections could be overcome), the developable areas of potential site allocations to the east of Rushden should be reduced accordingly. On this basis, the following potential sites/development options were identified:

**Land to the south east of Rushden:**

1. Rushden South East “Northern” option – land surrounding 170-184 Newton Road;
2. Rushden South East “Infill” option – linear growth between A6 roundabout and 250 Newton Road; and
3. Rushden South East “Southern” option – land east of the A6 Bypass/west of John White Golf Club, Bedford Road.

**Land to the east of Rushden/Higham Ferrers:**

4. Land west of Slater’s Lodge, Newton Road, Rushden/Higham Ferrers.

5.11 The conclusions of the November 2019 broader site assessment work are set out below.

**Rushden South East (site options 1-3, above)**

It is recognised that this site could be developed independently from the Rushden East SUE. However, major improvements would need to be carried out to the local highway network. The area lies within Rushden parish, which defines the Growth Town for the District, and therefore is a preferred location for development in the North Northamptonshire Joint Core Strategy. However, there are issues of accessibility to Rushden town centre and poor access to its facilities and services, which, prior to the construction of the SUE, do not exist to the east of the A6. Further at this time the location is considered to be poorly integrated with the form of the settlement of Rushden. There is also a possible archaeological constraint on development which needs further investigation. For these reasons this site is not favourably considered.

In summary it was recognised that this area of search had potential, which was reflected in the overall scoring assessment.

**Land east of Higham Ferrers (site option 4, above)**

The site offers some potential in the longer term if developed in conjunction with the Rushden East Sustainable Urban Extension. However, as the purpose of this study is to find a site to be developed in the shorter term, it should be discounted at this moment in time. This is due to the extent of highway improvements if it was to be developed in isolation and poor connectivity/integration with Higham Ferrers/Rushden plus the poor integration it has with the built form of any nearby settlement. Finally, further work is required on the topic of archaeology.
In summary, it was recognised that this site was dependent on the construction of part of the Rushden East SUE to allow it to satisfactorily progress. The primary issues are the ongoing delays/ uncertainties in delivering the major SUEs; so the focus on this assessment is to identify sites that are deliverable within the current Plan period.

5.12 The November 2019 assessment used a ‘traffic light ‘system to indicate how well these broad locations perform against the criteria. The colour coding used is as follows:

<table>
<thead>
<tr>
<th>Colour</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green</td>
<td>No negative impact identified</td>
</tr>
<tr>
<td>Amber</td>
<td>Some issue/ impact</td>
</tr>
<tr>
<td>Red</td>
<td>Major negative impact</td>
</tr>
</tbody>
</table>

5.13 For this additional assessment work undertaken in respect of the specific site proposals two potential approaches were considered:

- Use of the traffic light system, in line with the previous assessment; and
- Applying a numerical scoring system.

5.14 In order to align to the initial broad location assessment (November 2019), the traffic light system was used to provide an initial overall assessment in accordance with the former. A matrix comparing the colour coding for each site in respect of each criterion has also been provided as part of the assessment at Appendix 1. However, for this more detailed site specific assessment it was deemed necessary to supplement the traffic light matrix with a numerical scoring system in order to allow the four alternative sites to be ranked directly in relation to one another (3rd stage assessment, below).

5.15 The assessment criteria at Appendix 1 are largely those utilised for the previous broad area assessments. These have been reviewed; both in order to take account of the latest available evidence base and a need to allow for a “finer grain” comparison between the potential sites options assessed. Most significantly, a change has been made to the flood risk assessment criterion, to refer to the site by site assessment in the recently updated Strategic Flood Risk Assessment (February 2020).

5.16 More detailed information in respect of each site, including a summary of the key positive and negative impacts, is included in Appendix 2. The purpose of the assessment is to identify where the potential for conformity or conflict with the criteria arise and to assist in identifying issues where further work may need to be undertaken.

5.17 It is emphasised that where an issue is highlighted in red it does not necessarily imply that the particular constraint cannot be mitigated. The purpose of

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assessing each site against the sustainability criteria is to produce a consistent and comparable assessment which can be used to enable a judgement to be made as to which site ought to be included in the Plan.

3rd stage assessment: ranking of assessed sites

5.18 The “traffic light” assessment provides a good visual indicator of the relative merits of the four options/potential sites. However, it does not necessarily provide a clear means by which sites can be effectively ranked. Therefore, a numerical ranking system has been developed, which should give additional quantitative clarity to the site selection process, by allowing the relative merits of individual options to be directly compared to one another.

5.19 The ranking process provides a site specific scoring on the following basis:

- Scorings between 1 (lowest ranking) and 4 (highest ranking);
- Where two or more sites are considered to be of an equal ranking, these would be equally scored (see matrix below).

<table>
<thead>
<tr>
<th>Site ranking</th>
<th>Highest</th>
<th>2nd place</th>
<th>3rd place</th>
<th>Lowest</th>
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</thead>
<tbody>
<tr>
<td>Site score</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 x highest ranking sites</td>
<td>4</td>
<td>3</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>tied</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 x 2nd placed sites tied</td>
<td>4</td>
<td>3</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>2 x 3rd placed sites tied</td>
<td>4</td>
<td>3</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>3 x highest ranking sites</td>
<td>4</td>
<td>2</td>
<td>1</td>
<td></td>
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<tr>
<td>tied</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 x 2nd placed sites tied</td>
<td>4</td>
<td>2</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>All sites tied/ scoring</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>equally</td>
<td></td>
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</table>

6.0 Key findings of traffic light (2nd stage) and rankings (3rd stage) assessments

6.1 The four sites have been systematically assessed with reference to the methodology set out at section 5.0 (above). The traffic light assessment has enabled key potential opportunities and constraints pertaining to each site to be identified and analysed.

6.2 The key findings of the traffic light assessment are as follows:

1. All options require crossing the A6 at some point to access existing services and facilities. In the medium/long term, it is recognised that sites could be mitigated, to be well placed to access new services at Rushden East, however, the assessment needs to relate to their current status; (i.e. deliverability as at summer 2020).

12 In this scenario, 2 points are awarded for each site in place of the usual three, to reflect the median score
2. All options are well related to the strategic road network, but all require the development of associated or enhanced highways infrastructure to support delivery and make development acceptable in planning terms.

3. All options have current rural land uses; i.e. either agricultural or equestrian uses.

4. Sites with closest proximity to the A6 (options 1 and 3) are constrained by amenity considerations; i.e. a need to mitigate the impacts of noise, odour and other pollution from the A6 Bypass.

5. Land at Slater’s Lodge (option 4) lies largely within the 3km SPA buffer zone, while those options to the south east of Rushden are, with the exception of a small part of options 1 and 2, situated beyond the 3km zone.

6. All options were found to have limited/low landscape or heritage sensitivity, although options 1 and 2 are noted as being affected by various archaeological assets.

7. All options present minimal implications for natural resources, although in all cases localised surface water flooding hotspots are identified, while part of the Slater’s Lodge site also lies within the designated minerals safeguarding area (Minerals and Waste Local Plan).

8. Land at Slater’s Lodge is not considered developable independently of Rushden East. This option would need to be supported by wider infrastructure provided in association with Rushden East.

6.3 The qualitative and traffic light assessment is also supplemented by the ranking matrix. This has enabled a direct comparison between sites to be made, such that an overall ranking for each can be identified. The table below indicates the ranked scorings for each site.

<table>
<thead>
<tr>
<th>Site option</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land surrounding 170-184 Newton Road</td>
<td>Land east of the A6 Bypass/ west of John White Golf Club, Bedford Road</td>
<td>Land west of Slater’s Lodge, Newton Road, Higham Ferrers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>&quot;Northern&quot; option</td>
<td>&quot;Linear&quot; option</td>
<td>&quot;Southern&quot; option</td>
<td>Rushden East extension</td>
<td></td>
</tr>
<tr>
<td>TOTAL RANKED SCORING</td>
<td>86</td>
<td>79</td>
<td>95</td>
<td>62</td>
</tr>
</tbody>
</table>

6.4 These ranked scorings identify land east of the A6 Bypass/ west of John White Golf Club, Bedford Road (the “southern” option) as having the highest overall ranked scoring, while Slater’s Lodge is lowest. These variations are reflected by the current situation as they are not able to anticipate what exactly may/ may not occur in the future. Options 1, 2 and 4 would all significantly benefit from accessibility to new services, facilities and infrastructure, which are proposed to be delivered at Rushden East in the longer term.
7.0 Conclusion and recommendations

7.1 It is recognised that to a greater or lesser extent, all proposed options raise issues which need to be taken into consideration in providing an overall assessment for future housing delivery. All sites would require some degree of mitigation to allow development. This analysis considers the relative merits of the four alternative site specific proposals in a systematic way, to allow for a robust and effective site selection.

7.2 Following the assessment process, the southern option (i.e. land east of the A6 Bypass/ west of John White Golf Club, Bedford Road) achieves the highest overall score ranking. Consultation with statutory undertakers does not reveal any constraints which could not be satisfactorily mitigated. Allocation of additional housing land of the quantity required, to ensure that the JCS housing requirements (Policy 29/ Table 5) can be delivered in a timely manner within the Plan period appears viable. The wider site has also been promoted through representations submitted as part of the previous public consultation.

7.3 The southern option could therefore provide a viable alternative to Rushden Lakes West. This site has certain attributes, summarised as follows:

- Opportunities for connectivity to the existing urban area (via Bedford Road/ High Street South);
- Single ownership;
- Active promotion by landowner/ partner housebuilder (Bellway Homes);
- Potential to provide new access from Bedford Road roundabout, with a 40mph limit already in force;
- Could be delivered entirely independently of Rushden East sustainable urban extension; and
- Opportunity to open up longer term growth options, between Bedford Road and Newton Road.

7.4 However, any decision to allocate the southern option as a viable alternative proposal should acknowledge the following caveats:

- Rushden Lakes West remains the Council’s preferred option, as agreed by the Planning Policy Committee on 17 December 2019;
- If objections to Rushden Lakes West from Natural England and the Wildlife Trust could be satisfactorily overcome (including allowing for a reduced scale of development, around 300/350 dwellings south of the Rushden Lakes/ Ditchford Lane link road), this would reduce the required capacity for potential sites to the south east of Rushden;
• If development at Rushden Lakes West (300/350 dwellings) could be satisfactorily mitigated, then it could be supported by smaller scale infilling within the Growth Town area (to deliver 100-150 dwellings.

7.5 In conclusion, this report has assessed the potential to deliver 450 dwellings as a viable alternative allocation to Rushden Lakes West. It identifies the potential for land south of Newton Road (option 3: the “southern” option) as providing the most favourable option for providing a suitable alternative should the mitigation measures required for Rushden Lakes not be capable of being met. Option 1 (“northern” option) could also be a viable alternative, but overall this is less favourable than the southern option; predominantly due to constraints such as highways and piecemeal land ownership.
## Appendix 1 – Site assessment template

Methodology template for the assessment of the short listed sites.

<table>
<thead>
<tr>
<th>Sustainability Appraisal Topic¹³</th>
<th>Sustainability Appraisal Objective</th>
<th>Decision making criteria/source</th>
<th>Symbol</th>
</tr>
</thead>
</table>
| **Social Progress which recognises the needs of everyone** | To improve accessibility and transport links from residential areas to key services, facilities and employment areas and enhance access to natural environment and recreational opportunities | **Proximity to services**<br>
Good proximity<br>Medium proximity<br>Poor proximity | |
| | | **Proximity to the trunk/principal road network**<br>
Well located<br>Medium proximity<br>Poorly located | |
| | | **Connectivity to the existing urban area (Urban Structures Study)**<br>
Site well connected (for example, score of A in the Urban Structures Study (USS) carried out by the NNJPDU)<br>Some connectivity issues (for example, score of B or C in USS)<br>Site poorly connected (for example, score of D or E in USS) | |
| **Accessibility** | Access infrastructure | Good<br>Some works to be undertaken<br>Concerns from the Highway Authority | |
| | Capacity of the highway network | No works needed to increase capacity<br>Some works to be undertaken<br>Concerns from the Highway Authority | |
| | Utilities | Good provision<br>Neutral impact<br>Concerns about provision | |
| **Housing** | Ensure that new housing provided meets the housing needs of the area, provide affordable and decent housing for all | **All housing sites are likely to offer similar opportunities to meet this objective – it has not therefore been used as a criterion for choosing between sites.** | |
| **Health** | Improve overall levels of physical and mental health, reduce the disparities between different groups and different areas | **Impact on existing sports and recreation facilities (local authority)**<br>No impact<br>The loss of facilities could be mitigated<br>Loss of facilities – unlikely that this impact could be mitigated | |
| | | **Impact of an existing notifiable installation, including pipelines, on the development (HSE)** | |

| Crime | To improve community safety, reduce the incidences of crime and the fear of crime and anti-social behaviour – a safe place to live | All sites are likely to offer similar opportunities to meet this objective – it has not therefore been used as a criterion for choosing between sites. |
| Community | Value and nurture a sense of belonging in a cohesive community whilst respecting diversity | All sites may offer opportunities to contribute towards this objective – it has not therefore been used as a criterion for choosing between sites. |
| Skills | To improve overall levels of education and skills | Not relevant to the assessment – it will not assist in choosing between sites. |
| Liveability | To create healthy, clean and pleasant environments for people to enjoy living, working and recreating in and to protect and enhance residential amenity | Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development (local authority)
- Development not significantly affected.
- Development affected - but this could be mitigated.
- Development significantly affected – unlikely that this could be satisfactorily mitigated.
Impact of the development on neighbouring land uses (local authority)
- Compatible with neighbouring uses
- Compatible, subject to mitigation measures
- Incompatible – unlikely that the impact could be mitigated |
| Effective protection of the environment | | |
| Biodiversity | To protect, conserve and enhance biodiversity, geodiversity, wildlife habitats and green infrastructure to achieve a net gain and to avoid habitat fragmentation | Impact on biodiversity (RNRP assessment/SHLAA)¹⁴
- Within an area of low sensitivity or not within an area of sensitivity
- Within an area of medium sensitivity
- Within an area of high sensitivity
Impact of the development on a protected species or on a site recognised for its wildlife or geological importance (local authority)
- Unlikely to have an adverse impact
- Likely to have an adverse impact, although it is likely that this could be mitigated
- Major adverse impact - less certain that this could be mitigated |
| Landscape | To protect and enhance the quality, character and local distinctiveness of the natural and cultural | Impact on visual landscape (RNRP assessment/SHLAA)
- Within an area of low sensitivity or not within an area of sensitivity
- Within an area of medium sensitivity |

<table>
<thead>
<tr>
<th>Landscape and the built environment</th>
<th>Within an area of high sensitivity</th>
<th><strong>Impact on the existing form of the settlement</strong>&lt;br&gt;Significant positive impact (e.g. gateway development or redevelopment of brownfield land in a prominent location)</th>
<th>Neutral impact on the form and character of the settlement</th>
<th>Significant adverse impact (e.g. would affect prominent vistas/views; result in coalescence with neighbouring settlement or is significantly detached from the settlement)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cultural heritage</td>
<td>Protect and enhance sites, features and areas of historic, archaeological, architectural and artistic interest and their setting</td>
<td><strong>Impact on heritage (RNRP assessment/SHLAA)</strong>&lt;br&gt;Within an area of low sensitivity or not within an area of sensitivity</td>
<td>Within an area of medium sensitivity; e.g. non-statutory archaeological assets identified</td>
<td>Within an area of high sensitivity</td>
</tr>
<tr>
<td>Climate change</td>
<td>Reduce the emissions of greenhouse gases and impact of climate change (adaptation and mitigation)</td>
<td><strong>All sites are likely to offer similar opportunities to meet this objective; it is not therefore a criterion for choosing between sites.</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prudent use of natural resources</td>
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<tr>
<td>Natural hazard</td>
<td>Reduce impact of flooding and avoid additional risk</td>
<td><strong>Impact on flood risk (Strategic Flood Risk Assessment, February 2020)</strong>&lt;br&gt;Minimal flood risk identified from all sources (SFRA scoring &lt;3)</td>
<td>Potential flood risk identified from 2 or more sources (SFRA scoring 3-5)</td>
<td>Significant flood risk identified; e.g. situated within EA Flood Zones 2 or 3 (SFRA scoring &gt;5)</td>
</tr>
<tr>
<td>Soil and land</td>
<td>Ensure efficient use of land and maintain the resource of productive soil</td>
<td><strong>Impact on the use of previously developed land (local authority)</strong>&lt;br&gt;Development would be entirely, or essentially, on brownfield land</td>
<td>A significant proportion of the site is greenfield</td>
<td>Development is entirely, or essentially, greenfield</td>
</tr>
</tbody>
</table>
The detailed site by site assessments are set out at Appendix 2, below.
Appendix 2 – Detailed site by site assessments

Site 1 – “Northern” option – land surrounding 170-184 Newton Road

View of site from main potential point(s) of access

View south into western part of site, from Newton Road (near A6 Bypass roundabout)  
View of potential eastern site entrance from Newton Road, to the east of 184 Newton Road
### “Northern” option – land surrounding 170-184 Newton Road


<table>
<thead>
<tr>
<th>Site Area: 19.4 ha</th>
<th>Proposed mix of uses: predominantly residential (14.5ha), with an element of employment (4.5ha) to the west of 170 Newton Road</th>
</tr>
</thead>
</table>

**Uses:** The site is predominantly agricultural, but includes domestic curtilage (170 Newton Road) and equestrian uses (land between 184 and 202 Newton Road)

**Site Description:** The site is located to the south of Newton Road and east of the A6 Bypass. It surrounds the ribbon development 170-184 Newton Road.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Comments</th>
</tr>
</thead>
</table>
| Proximity to services | The north-western most part of the site is in close proximity to a surgery (Barrington Road), immediately opposite across the busy A6 strategic route. It is also physically in close proximity the Rushden Primary Academy (Goulsbra Road), although this is not easily accessible as it is on the opposite side of the A6. Other facilities such as shops and leisure uses and employment uses are accessible within the town centre (via Newton Road), but again are only accessible by crossing the A6. The western part of the site is within the following walking/ cycling distance of the following key services and facilities (within 1 mile/ 1.6km):  
  - GP surgery – 300m (albeit crossing A6 Bypass);  
  - Rushden Primary Academy – 1200m (crossing A6 Bypass).  
  - Town centre services/ facilities (e.g. Lidl) – 1200m (crossing A6 Bypass)  
  - Birkdale Drive NEAP – 550m (crossing A6 Bypass) |
<p>| Proximity to a trunk/ principal road junction | Site is adjacent to the A6 |
| Connectivity to the existing urban area | On the opposite side of the A6 to the town of Rushden, which by definition greatly limits connectivity opportunities (this is the case for all sites assessed). The County Highway Authority also considers that improved pedestrian and cycle links are required along Newton Road into Rushden Town Centre. The site is considered as a Grade E location in the Urban Structures Study carried out by the NNJPDU. However, the part of the site adjacent to 170 Newton Road/ A6 roundabout is closely related to the existing urban area within the south east sector; having direct linear access via Newton Road to the town centre. |</p>
<table>
<thead>
<tr>
<th>Access infrastructure</th>
<th>A direct access to the A6 would not be acceptable. Access would be needed onto Newton Road.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capacity of the highway network</td>
<td>The County Highway Authority advises as part of the Rushden East proposal that the initial stretch of Newton Road from the A6 roundabout is set to have significant upgrades. If this site comes forward first it will need to provide these measures; plus this site will need to continue any carriageway widening and footway / cycleway infrastructure up to the proposed site access. The Highway Authority also raises possible issues of traffic using Avenue Road to access the A6 and advises that these will need to be mitigated. Highways England (HE) has no objections in principle if one or a combination of these sites is allocated for up to 500 dwellings (July 2020). This is because HE considers that the traffic impacts of the proposed development on the Strategic Road Network (SRN) can be assessed through a Transport Assessment (TA). The additional requirement (450 dwellings) is being proposed to offset the anticipated delivery shortfalls from sustainable urban extensions within the current plan period, but which have already been taken into account in previous transport modelling. The TA can also identify any mitigation that may be required to be provided on the SRN to accommodate the additional traffic from the development quantum that has been proposed. Additional Highway Authority comments (July 2020) – Access would need to be from Newton Road; direct access onto the A6 roundabout would be resisted on highway safety grounds Reference: Design Manual for Roads and Bridges CD116 Geometric Design of Roundabouts, clause 2.3.4 states normal roundabouts with 5 or more arms should not be provided. The ICD is too small for an additional arm and if the ICD is increased the circulatory speeds are high which creates safety issues for traffic entering the roundabout (hence the restriction to 4 arm roundabouts). Need to look at the current width of Newton Road and the cycle / pedestrian links across the A6 to provide further comment. Suggest a minimum width carriageway of 6.5m is required up to the site accesses.</td>
</tr>
<tr>
<td>Utilities</td>
<td>Based on findings in 2011 update to the SHLAA</td>
</tr>
<tr>
<td>Impact of an existing notifiable installation, including pipelines, on the</td>
<td>No known constraints of this nature on site</td>
</tr>
<tr>
<td>Impact on existing sports and recreation facilities, including allotment land</td>
<td>Site is predominantly agricultural, but includes domestic curtilage (170 Newton Road) and equestrian uses (land between 184 and 202 Newton Road). However, development would not lead to the loss of any existing/established sports or recreational public open spaces.</td>
</tr>
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</tr>
<tr>
<td>Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development.</td>
<td>ENC Environmental Protection advises that there are issues of noise associated with the adjacent A6 which will need to be mitigated. This will be most significant at the western edge of the site.</td>
</tr>
<tr>
<td>Impact of the development on neighbouring land uses</td>
<td>Development would enclose the existing outlying ribbon development (170-184 Newton Road). Development of the site is considered to be compatible with existing adjacent uses.</td>
</tr>
<tr>
<td>Impact on biodiversity</td>
<td>Natural England advised (August 2020) that all sites proposed carry a risk of recreational pressure on the SPA beyond that anticipated within the Mitigation Strategy. Therefore, like Rushden East SUE, they will all require bespoke mitigation options to address this in order to achieve sustainable development, which is Habitats Regulations compliant. Although the field sizes are relatively small, they are on or nearby areas of grassland. Grassland habitats are preferential to golden plover and lapwing over and above agricultural land, therefore the limited supply of this around the valley should be a consideration.</td>
</tr>
<tr>
<td>Impact of the development on a protected species or on a site recognised for its wildlife or geological importance</td>
<td>Natural England previously advised (autumn 2019) of the need for a search for protected species and historic environment interests as well as an assessment for potential Functionally Linked Land. The site is marginally within the 3km consultation zone for the Upper Nene Gravel Pits Special Protection Area. Any residential units proposed in this area need to make a contribution towards mitigation of impact on the SPA. Natural England considers this site of overall low risk to the integrity of the SPA. However, this issue still requires careful consideration and NE would require substantial high quality on site green infrastructure, as well as bespoke contributions to mitigation measures off site. NE also advised about the use of the Habitat Opportunity Mapping dataset to assess the potential for the site to be restored to provide a net gain for biodiversity and strengthen the ecosystem services provided by that location. NE added that they would need to agree any proposed mitigation measures through a project level Appropriate Assessment, and planning conditions to secure the required mitigation.</td>
</tr>
<tr>
<td>Impact on visual landscape</td>
<td>Site considered as having low landscape sensitivity in the Environmental Sensitivity Consolidation Study carried out in October 2009 for the North Northamptonshire Joint Planning Unit.</td>
</tr>
<tr>
<td>----------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Impact on heritage</td>
<td>The County Archaeological Advisor is of the opinion that development is likely to have a significant negative impact on the historic environment. They need further information regarding archaeological significance in the form of archaeological assessment in order that this matter can be considered further. However, there are no designated heritage assets (Listed Buildings etc) on or immediately adjacent to the site.</td>
</tr>
<tr>
<td>Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks and gardens</td>
<td>The site is entirely within Flood Zone 1. The Environment Agency previously advised of no concerns. The Strategic Flood Risk Assessment (SFRA), February 2020, identifies one significant surface water flow path bisecting the site, from the rear of properties on Newton Road to the A6, which would need to be preserved or suitably mitigated through design. The SFRA also reveals that there is negligible groundwater flood risk and no significant flood history of note affecting the site. The Lead Local Flood Authority’s advice (30 July 2020) reflected that of the SFRA; noting significant surface water flow paths through the site flowing west to the A6 which would need to be preserved or suitably mitigated through design. An ordinary watercourse which runs parallel to the northern boundary of the site would need to be protected, no works within 9m without land drainage consent. No groundwater flood risk within the site boundary. A couple of historic flood incidents on Pevensey Close, unlikely to have affected the site.</td>
</tr>
<tr>
<td>Impact on the existing form of the settlement</td>
<td>Site essentially not previously developed, although it does contain some equestrian buildings between 184 and 202 Newton Road. ENC Environmental Protection advises that the</td>
</tr>
</tbody>
</table>
former Manor Park landfill site lies immediately to the south west and may encroach under the A6 and into the area of interest. In view of this, there may contamination and a ground gas risk associated with any residential development in the south of the site. If so, this area would have to be excluded from the site but the site is large enough for this to occur.

**Impact on the quality of agricultural land**  
The majority of the site is Grade 3\(^{15}\) agricultural land. However, in the context of the size of the site compared to a large amount of other remaining Grade 3 land in the vicinity; this is not considered a significant development constraint.

**Impact on the stock of minerals**  
Site not allocated for mineral extraction or within the designated mineral safeguarding area in the County Council’s Minerals and Waste Local Plan.

**Availability**  
Parts of the site are being actively promoted as being available for development.

Land is currently in four distinctive ownerships (including ENC). However, land assembly is not considered to represent a significant development constraint.

ENC (Economic and Commercial Development) advised, regarding the Council’s and holdings, that the Council could potentially serve a short notice of one month, but there would be the risk in this approach re the tenancy agreement; this being that the notice would be invalid and the tenant could challenge it, otherwise to would be necessary to serve the more than twelve months notice expiring on 31st December 2021 re none agricultural use.

**Deliverability**  
Could be delivered in advance of the major road infrastructure needed for the Rushden East development if necessary improvements are carried out on Newton Road.

**SHLAA category**  
Category 3 (southern part of site)

**Planning Policy**  
Site adjoins the main Rushden (Growth Town) urban area

**Other matters**  
NCC Education (July 2020) advises that the site lies to the east of the A6, and as such connectivity between the development and existing schools in Rushden would be a concern, with no suitable safe walking routes currently available. Furthermore, capacity within those schools is already limited, and development of up to 450 dwellings would equate to c. 144 primary and 108 secondary age pupils being generated.

In the event that any of the sites came forward before Rushden East SUE then additional capacity would need to be provided at existing

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\(^{15}\) ENC data does not differentiate between Category 3a and 3b agricultural land, treating all Grade 3 land as Best and Most Versatile.
schools. There is a lack of safe access over the A6 to existing schools in Rushden, although the site is within physical proximity of the Rushden Primary Academy.

It is unclear whether there would be suitable access across Newton Road to the proposed Rushden East SUE, although it would be expected that connections would be delivered in association with the latter. Connectivity across Newton Road would enable pupils to attend schools in either Rushden East or the Primary Academy. Again, additional capacity would need to be provided to support any development coming forward in this area; most likely towards the provision of additional capacity within the SUE at both Primary and Secondary levels, alongside suitable access. If the site comes forward significantly in advance of Rushden East, then additional capacity may be required at the Rushden Primary Academy and/ or (as appropriate) secondary schools in Rushden and Higham Ferrers.

Part of the site (land at 170 Newton Road) was assessed for the Neighbourhood Plan. This site assessment\(^\text{16}\) ranked potential sites within the town on a “suitability index”. In the case of land adjoining 170 Newton Road (reference NP5), this was the next ranked site, following those within the main urban area that were allocated in the Neighbourhood Plan.

### Summary of Assessment:

<table>
<thead>
<tr>
<th>Key potential opportunities</th>
<th>Key potential constraints</th>
</tr>
</thead>
<tbody>
<tr>
<td>Could be delivered in advance of the major road infrastructure needed for the Rushden East development if some improvements are carried out on Newton Road.</td>
<td>Substantial highway improvements would be needed for Newton Road to service the development, especially if this is to come forward in advance of infrastructure associated with Rushden East.</td>
</tr>
<tr>
<td>Broadly corresponds to Rushden East SUE indicative area for growth</td>
<td>Archaeological assessment required.</td>
</tr>
<tr>
<td>Well related to existing built development to the east of the A6 Bypass (170-184 Newton Road)</td>
<td>Land assembly – at least four separate parcels of land in differing ownerships</td>
</tr>
</tbody>
</table>

**Conclusion:**

The northern option could provide an opportunity for a self contained and logical urban extension to the south of Newton Road. This site approximately equates to that part of the Rushden East SUE indicative area for growth, which lies to the south of Newton Road. It could represent a logical extension to the existing built up/ribbon development area to the south of Newton Road, but be delivered independently of, but be closely related to, Rushden East.

This site largely corresponds to the “Land to the south east of Rushden”, the area assessed in the earlier (November 2019) site assessment work. However, this area was not favourably considered.

at the time, as the location was considered to be poorly integrated with the form of the settlement of Rushden.

Despite some positive attributes, there are challenges to delivering the site. In particular, development would entail significant highway improvements to Newton Road if the site is to come forward in advance of Rushden East. Conversely, if infrastructure requirements of Rushden East are awaited, this would affect the deliverability of the site and therefore its effectiveness as an alternative to the Rushden Lakes West proposal.

Furthermore, the site falls into at least four separate land parcels. While this issue of land assembly could be overcome, it does raise questions as to the overall deliverability, given the need to engage with multiple landowners to secure a sustainable development scheme.
Site 2 – “Infill” option – linear growth between A6 roundabout and 250 Newton Road

View of sites from main potential point(s) of access

View south into western plot, adjacent to 170 Newton Road

View south into middle plot, land between 184 and 202 Newton Road
View south in to eastern plot, adjacent to 202 Newton Road

“Infill” option – linear growth between A6 roundabout and 250 Newton Road


<table>
<thead>
<tr>
<th>Site Area: 17.5 ha</th>
<th>Proposed mix of uses: predominantly residential, with an element of employment</th>
</tr>
</thead>
</table>

Current uses: Agricultural; with equestrian uses at land between 184 and 202 Newton Road

Site Description: The potential development area consists of three separate plots – Land west of 170 Newton Road, land between 184 and 202 Newton Road, and land between 202 and 250 Newton Road. The extent of development would depend upon the residual housing shortfall figure that would need to be met; dependent upon whether a quantum of development could be accommodated at Rushden Lakes West, the Council’s preferred site.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proximity to services</td>
<td>The western-most part of the site is in close proximity to a surgery (Barrington Road), immediately opposite across the busy A6 strategic route. It is also physically in close proximity the Rushden Primary Academy (Goulsbra Road), although this is not easily accessible as it is on the opposite side of the A6. Other facilities such as shops and leisure uses and employment uses are accessible within the town centre (via Newton Road), but again are only accessible by crossing the A6. The western part of the site is within the following walking/ cycling distance of the following key services and facilities (within 1 mile/ 1.6km):</td>
</tr>
<tr>
<td></td>
<td>• GP surgery – 300m (albeit crossing A6 Bypass);</td>
</tr>
<tr>
<td></td>
<td>• Rushden Primary Academy – 1200m (crossing A6 Bypass).</td>
</tr>
<tr>
<td></td>
<td>• Town centre services/ facilities (e.g. Lidl) – 1200m (crossing A6 Bypass).</td>
</tr>
<tr>
<td>Proximity to a trunk/principal road junction</td>
<td>Site is adjacent to the A6</td>
</tr>
<tr>
<td>Connectivity to the existing urban area</td>
<td>On the opposite side of the A6 to the town of Rushden, which by definition greatly limits connectivity opportunities (this is the case for all sites assessed). The County Highway Authority also considers that improved pedestrian and cycle links are required along Newton Road into Rushden Town Centre. The site is considered as a Grade E location in the Urban Structures Study carried out by the NNJPDU. The part of the site adjacent to 170 Newton Road/A6 roundabout is most closely related to the existing urban area within the south east sector. However, the majority of the linear proposal is somewhat detached from the main urban area and delivery of any scheme with acceptable connectivity would entail major improvements to Newton Road, for at least 700-800m along its route from the A6 roundabout.</td>
</tr>
<tr>
<td>Access infrastructure</td>
<td>A direct access to the A6 would not be acceptable. At least three separate accesses would be needed onto Newton Road, to serve each element of the proposed linear development.</td>
</tr>
<tr>
<td>Capacity of the highway network</td>
<td>The County Highway Authority advises as part of the Rushden East proposal that the initial stretch of Newton Road from the A6 roundabout is set to have significant upgrades. If this site comes forward first it will need to provide these measures in their entirety. This site will need require continuation of any carriageway widening and footway/cycleway infrastructure up to the proposed site accesses. The Highway Authority also raises possible issues of traffic using Avenue Road to access the A6 and advises that these will need to be mitigated. Highways England (HE) has no objections in principle if one or a combination of sites is allocated for up to 500 dwellings (July 2020). This is because HE considers that the traffic impacts of the proposed development on the Strategic Road Network (SRN) can be assessed through a Transport Assessment (TA). The additional requirement (450 dwellings) is being proposed to offset the anticipated delivery shortfalls from sustainable urban extensions within the current plan period, but which have already been taken into account in previous transport modelling. The TA can also identify any mitigation that may be required to be provided on the SRN to accommodate the additional traffic from the development quantum that has been proposed.</td>
</tr>
</tbody>
</table>

Additional Highway Authority comments (July 2020) –
Access would need to be from Newton Road; direct access onto the A6 roundabout would be resisted on highway safety grounds.

Need to look at the current width of Newton Road and the cycle / pedestrian links across the A6 to provide further comment. Suggest a minimum width carriageway of 6.5m is required up to the site accesses.

<table>
<thead>
<tr>
<th>Utilities</th>
<th>Based on findings in 2011 update to the SHLAA, regarding adjacent site reference 2164.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact of an existing notifiable installation, including pipelines, on the development</td>
<td>No known constraints of this nature on site</td>
</tr>
<tr>
<td>Impact on existing sports and recreation facilities, including allotment land</td>
<td>Sites are predominantly agricultural, but include domestic curtilage (170 Newton Road) and equestrian uses (land between 184 and 202 Newton Road). However, development would not lead to the loss of any existing/ established sports or recreational public open spaces.</td>
</tr>
<tr>
<td>Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development</td>
<td>ENC Environmental Protection advises that there are issues of noise associated with the adjacent A6 which will need to be mitigated (land adjacent to 170 Newton Road). This will be most significant at the western edge of the westernmost site, but is not considered to be of significance to the other sites to the south of Newton Road.</td>
</tr>
</tbody>
</table>
| Impact of the development on neighbouring land uses | Development would represent a significant extension the existing Newton Road ribbon developments (170-184; 250-264 Newton Road).
While development of the sites is considered to be compatible with existing adjacent uses, the extensive additional development along the route of Newton Road would have a significant impact upon the overall character of this part of Rushden, which could not be realistically mitigated. |
| Impact on biodiversity | Natural England advised (August 2020) that all sites proposed carry a risk of recreational pressure on the SPA beyond that anticipated within the Mitigation |
### Impact of the development on a protected species or on a site recognised for its wildlife or geological importance

Strategy. Therefore, like Rushden East SUE, they will all require bespoke mitigation options to address this in order to achieve sustainable development, which is Habitats Regulations compliant.

Although the field sizes are relatively small, they are on or nearby areas of grassland. Grassland habitats are preferential to golden plover and lapwing over and above agricultural land, therefore the limited supply of this around the valley should be a consideration.

Natural England previously advised (autumn 2019) of the need for a search for protected species and historic environment interests as well as an assessment for potential Functionally Linked Land.

The westernmost site is marginally within the 3km consultation zone for the Upper Nene Gravel Pits Special Protection Area. Any residential units proposed in this area need to make a contribution towards mitigation of impact on the SPA. Natural England considers this site of overall low risk to the integrity of the SPA. However, this issue still requires careful consideration and NE would require substantial high quality on site green infrastructure, as well as bespoke contributions to mitigation measures off site.

NE also advised about the use of the Habitat Opportunity Mapping dataset to assess the potential for the site to be restored to provide a net gain for biodiversity and strengthen the ecosystem services provided by that location. NE added that they would need to agree any proposed mitigation measures through a project level Appropriate Assessment, and planning conditions to secure the required mitigation measures.

### Impact on visual landscape

Site considered as having low landscape sensitivity in the Environmental Sensitivity Consolidation Study carried out in October 2009 for the North Northamptonshire Joint Planning Unit.

### Impact on heritage

The County Archaeological Advisor is of the opinion that development is likely to have a significant negative impact on the historic environment. They need further information regarding archaeological significance in the form of archaeological assessment in order that this matter can be considered further.

However, there are no designated heritage assets (Listed Buildings etc) on or immediately adjacent to any of the three sites.

### Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks and gardens

There is some existing housing associated with Newton Road but the development would be separated from the main built form of Rushden by the A6.

However, access across Newton Road to the Rushden East SUE could allow for development to be integrated within the built form of Rushden in the
### Flood risk

The three sites are entirely within Flood Zone 1. The Environment Agency previously advised of no concerns. The Strategic Flood Risk Assessment (SFRA), February 2020, identifies at least one significant surface water flow path bisecting one or more of the sites, from the rear of properties on Newton Road to the A6, which would need to be preserved or suitably mitigated through design. The SFRA also reveals that there is negligible groundwater flood risk and no significant flood history of note affecting the site.

The Lead Local Flood Authority’s advice (30 July 2020) reflected that of the SFRA; noting an ordinary watercourse which runs parallel to the southern boundary of the site would need to be protected, no works within 9m without land drainage consent. No groundwater flood risk within the site boundary. A couple of historic flood incidents on Pevensey Close, unlikely to have affected the site.

### Impact on the use of previously developed land

Site essentially not previously developed, although it does contain some equestrian buildings between 184 and 202 Newton Road.

ENC Environmental Protection advises that the former Manor Park landfill site lies immediately to the south west and may encroach under the A6, affecting the westernmost site(s). In view of this, there may contamination and a ground gas risk associated with any residential development within the proximity of the A6.

### Impact on the quality of agricultural land

The majority of the area is Grade 3 agricultural land. However, in the context of the extent of the potential development area compared to a large amount of other remaining Grade 3 land in the vicinity; this is not considered a significant development constraint.

### Impact on the stock of minerals

Site not allocated for mineral extraction or within the designated mineral safeguarding area in the County Council’s Minerals and Waste Local Plan.

### Availability

Easternmost two sites being actively promoted, as currently available for development.

Land is currently in four distinctive ownerships (including ENC). However, land assembly is not considered to represent a significant development constraint.

ENC (Economic and Commercial Development) advised, regarding the Council’s and holdings, that the Council could potentially serve a short notice of one month, but there would be the risk in this approach re the tenancy agreement; this being that the notice would be invalid and the tenant could challenge it, otherwise to would be necessary to serve the more than twelve months notice expiring on
Deliverability
Could be delivered in advance of the major road infrastructure needed for the Rushden East development. However, this would entail significant improvements along a significant length of Newton Road (700-800m) from the A6 roundabout.

SHLAA category
Easternmost site forms part of Category 3 SHLAA site

Planning Policy
Site adjoins the main Rushden (Growth Town) urban area

Other matters
NCC Education (July 2020) advises that the site lies to the east of the A6, and as such connectivity between the development and existing schools in Rushden would be a concern, with no suitable safe walking routes currently available. Furthermore, capacity within those schools is already limited, and development of up to 450 dwellings would equate to c. 144 primary and 108 secondary age pupils being generated.

In the event that any of the sites came forward before Rushden East SUE then additional capacity would need to be provided at existing schools. There is a lack of safe access over the A6 to existing schools in Rushden, although the site is within physical proximity of the Rushden Primary Academy.

It is unclear whether there would be suitable access across Newton Road to the proposed Rushden East SUE, although it would be expected that connections would be delivered in association with the latter. Connectivity across Newton Road would enable pupils to attend schools in either Rushden East or the Primary Academy. Again, additional capacity would need to be provided to support any development coming forward in this area; most likely towards the provision of additional capacity within the SUE at both Primary and Secondary levels, alongside suitable access. If development was to come forward significantly in advance of Rushden East, then additional capacity may be required at the Rushden Primary Academy and/ or (as appropriate) secondary schools in Rushden and Higham Ferrers.

The westernmost site (land at 170 Newton Road) was assessed for the Neighbourhood Plan. This site assessment ranked potential sites within the town on a “suitability index”. In the case of land adjoining 170 Newton Road (reference NP5), this was the next ranked site, following those within the main urban area that were allocated in the Neighbourhood Plan.

Summary of Assessment:

<table>
<thead>
<tr>
<th>Key potential opportunities</th>
<th>Key potential constraints</th>
</tr>
</thead>
<tbody>
<tr>
<td>Could be delivered in advance of the major road infrastructure needed for the Rushden East development, although this would require significant improvements to Newton</td>
<td>Major highway improvements could be needed for Newton Road to service the development, covering 700-800m of this road, if this is to come forward in advance of infrastructure associated with Rushden</td>
</tr>
<tr>
<td>Road.</td>
<td>East.</td>
</tr>
<tr>
<td>-------</td>
<td>-------</td>
</tr>
<tr>
<td>Well related to existing built development to the east of the A6 Bypass (170-184 Newton Road)</td>
<td>Archaeological assessment required.</td>
</tr>
<tr>
<td>Provides an opportunity to deliver smaller scale infilling, to deliver a residual requirement in the event that some development could be delivered at Rushden Lakes West</td>
<td>Land assembly – at least four separate parcels of land in differing ownerships</td>
</tr>
</tbody>
</table>

**Conclusion:**

The linear option could provide an opportunity for up to three self contained developments to the south of Newton Road. This option includes part of the Rushden East SUE indicative area for growth, which lies to the south of Newton Road. It could represent a logical extension to the existing ribbon development area to the south of Newton Road, but be delivered independently of, but be closely related to, Rushden East.

This site partially corresponds to the “Land to the south east of Rushden”, the area assessed in the earlier (November 2019) site assessment work. However, this area was not favourably considered at the time, as the location was considered to be poorly integrated with the form of the settlement of Rushden. In particular, the easternmost of the three sites is remote from the existing built up area of the town.

Despite some positive attributes, there are challenges to delivering this option. In particular, development would entail major highway improvements to Newton Road if the three sites are to come forward in advance of Rushden East. Conversely, if infrastructure requirements of Rushden East are awaited, this would affect the deliverability of all three sites and therefore its effectiveness as an alternative to the Rushden Lakes West proposal.
Site 3 – “Southern” option – land east of the A6 Bypass/ west of John White Golf Club, Bedford Road

View of site from main potential point(s) of access

View from A6 Bypass (north western corner, Public Right of Way UK9) into site (potential pedestrian access)

View north into site, from John White Golf Course service road
“Southern” option – land east of the A6 Bypass/ west of John White Golf Club, Bedford Road


Site Area: 11.7 Ha

Proposed mix of uses: Residential

Uses: Rural – arable agricultural land, cultivated with wheat/ barley crop, including northwestern corner of John White golf course

Site Description: The western boundary, along the A6, is lined with dense, high level vegetation of up to c.2m from the field level. From the A6 carriageway level this vegetation covers a bund and presents a steeply sloping bank of shrubs/ trees of approximately 6m in height. This site appears to be at a lower level than the bund and is an arable field, cultivated with a wheat crop. The land slopes down in a northerly direction to a dip midway down the field and then rises up to the northern perimeter. The northern boundary of this triangular site is tree-lined and has a dry stream-bed, running parallel to an adjacent Public Right of Way.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Comments</th>
</tr>
</thead>
</table>
| Proximity to services           | The site as a whole is in close proximity to both the John White Golf Course, Rushden Rugby Club (Manor Park) and Jubilee Park. Access to the latter two facilities would require users to cross the A6/ Bedford Road, although the proposed relocation of the Rugby Club and associated playing fields to the east of the A6 could support the overall sustainability of this potential site allocation. It is also within good walking distance of the Rushden Primary Academy, although the shortest route (via PROW UK9) would involve unprotected crossing of the dangerous A6 Bypass. Other facilities (e.g. convenience retailing, GP surgery) are over 1.5km (1 mile) walking distance. The western parts of the site are within the following walking/ cycling distance of the following key services and facilities (within 1 mile/ 1.6km):  
  • GP surgery – 1.6km (via PROW UK9, crossing A6 Bypass);  
  • Rushden Primary Academy – 500m (via PROW UK9),  
  • Convenience retailing/ town centre centre services/ facilities (Sainsbury’s, High Street South) – 1.5km (via Bedford Road)  
  • John White Golf Course (immediately adjacent); Manor Park – (via PROW UK9, crossing A6 Bypass) |
| Proximity to a trunk/ principal road junction | The site is situated immediately adjacent to the A6 Rushden Bypass.                                                                                                                                          |
| Connectivity to the existing urban area | The site falls within an area of the town with low integration potential (Urban Structures Study, category E). However, despite being on the opposite side of the A6 to the main urban area, the site would have... |
limited, but direct connectivity to the town centre via Bedford Road. Improved pedestrian and cycle links would be required along Bedford Road into Rushden Town Centre.

### Access infrastructure
- Direct access from the A6/A5028 southern roundabout via an improved access in the position of the current field access – to create a fourth exit.

### Capacity of the highway network
- Additional comments from NCC Highways regarding potential issues arising from this site, were received, 29th July 2020:
  - Suggest that signal toucan crossing would be essential. It should be located within 20m of the give-way line or 60m plus. The advantage of locating it at 20m is that the splitter island could be extended to provide a refuge and the signals be separate for each lane with a stagger (which will reduce delays and queuing on the roundabout exit). Locating it at 60m away is a big diversion from the desire line and will encourage informal crossing at the splitter. It will also be close to the 60 mph speed limit change and speeds are likely to be high, so not a good location for a crossing.
  - We would like to see an RSA1 (and subsequently review comments from our Audit and RSA Teams) of the new access with the toucan before anything is agreed.
  - No obvious signage at the existing cycle route on Bedford Road, which stops at the Rugby Club access and starts the other side. The LHA would be looking for improvements by the development including some widening where possible.
  - The TA mentions bus access, and provision for a stop within the site would be required. A loop layout would be required for the bus to be able to turn around (with a 6.5m wide c/w roads to allow this).

From a LHA perspective it was confirmed that there do not appear to be any “show stoppers” in principle. Bedford BC highlighted the impact of increased traffic on the highway network in the vicinity of the site; asking that suitable mitigation measures are put in place where a need is identified.

### Utilities
- Based on findings in 2011 update to the SHLAA

| Impact on an existing notifiable installation, including pipelines, on the development | No known constraints of this nature on site |
| Impact on existing sports and recreation facilities, including allotment land | Site is agricultural but includes part (north western corner) of the John White Golf Range/ Golf Club. Mitigation would be delivered by way of the relocation of the Rugby Club from its current Manor Park |
### Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development.

Comments were sought from ENC’s Environmental Protection team, regarding baseline environmental issues. Potential concerns are noted regarding noise and pollution at the eastern and southern boundaries arising from proximity to the A6 Bypass.

### Impact of the development on neighbouring land uses

The site would be separated from the existing urban area by the A6 and A5028 with playing fields to the western side and Golf Driving Range to the east. Development is considered compatible with existing adjacent uses.

Development provides an opportunity for enhanced integration between the south eastern part of the Rushden urban area, in association with the proposed relocation of the Rugby Club and redevelopment of the current site (Rushden Neighbourhood Plan).

### Impact on biodiversity

Natural England advised (August 2020) that all sites proposed carry a risk of recreational pressure on the SPA beyond that anticipated within the Mitigation Strategy. Therefore, like Rushden East SUE, they will all require bespoke mitigation options to address this in order to achieve sustainable development, which is Habitats Regulations compliant.

This site sits just outside of the 3km Mitigation Strategy buffer zone, therefore the Council will have to assess whether mitigation options for recreational pressure are required at this site via the HRA process. Natural England also highlighted that this option (or any other of the four proposed) is not within short walking distance of the SPA.

### Impact on visual landscape

Given the area’s typography and that it would be sufficiently removed from the highway the site would not be prominent in the street scene or from a wider viewpoint.

### Impact on heritage

The County Archaeologist was consulted, but no particular archaeological interest in/ adjacent to the site was noted. The County Records do not identify any non-designated archaeological/ historic environmental assets on the site.

There are no designated heritage assets (Listed Buildings, Ancient Monuments or Conservation Areas on or immediately adjacent to the site.

### Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks and gardens

There is some existing housing to the south of the Bedford Road (A5028), comprising a ribbon form of development but the development would be separated from the main built form of Rushden by the A6 Bypass.

Development of the site would extend the current location, but may also require realignment of the current Golf Course.
built form of Rushden beyond the A6 Bypass, but this should be seen in the wider context of development proposals in this sector of the urban area; particularly the proposed relocation of the Rugby Club and redevelopment of the current site (Rushden Neighbourhood Plan).

Flood risk

The site is entirely within Flood Zone 1. The Strategic Flood Risk Assessment (SFRA), February 2020, identifies one significant surface water flow path bisecting the site, which would need to be preserved or suitably mitigated through design.

The Lead Local Flood Authority (LLFA), noted a surface water flow path through the site flowing south to north through the western part of the site which will need to be preserved or suitably mitigated through design (July 2020). There is also significant surface water flood risk along the northern boundary of the site, along the footpath, which would need to be preserved and development avoided in areas at risk. There is an attenuation pond just outside the site boundary which is a Northamptonshire Highways asset.

No groundwater flood risk is identified within the site boundary. The LLFA do not hold any records of historic flooding in the area although this does not mean flooding has never or will never occur.

Impact on the use of previously developed land

The site is not previously developed.

Impact on the quality of agricultural land

The majority of the site is Grade 3 agricultural land. However in the context of the size of the site compared by the large amount of other Grade 3 agricultural land in the vicinity; this is not considered a significant development constraint.

Impact on the stock of minerals

Site not allocated for mineral extraction or within the designated mineral safeguarding area in the County Council’s Minerals and Waste Local Plan.

Availability

The site is being actively promoted as being available for development by Marrons Planning on behalf of Bellway Homes and the land owner.

Deliverability

This site could be delivered in advance of the major road infrastructure required for the Rushden East development. There is an opportunity for the roundabout to be remodeled, thereby improving the access point/entry road and Bedford Road (A6) roundabout.

SHLAA category

Category 3

Planning Policy

Site adjoins the main Rushden (Growth Town) urban area.

Other matters

NCC Education (July 2020) advises that the site lies to the east of the A6, and as such connectivity
between the development and existing schools in Rushden would be a concern, with no suitable safe walking routes/access currently available. Furthermore, capacity within those schools is already limited, and development of up to 450 dwellings would equate to c. 144 primary and 108 secondary age pupils being generated.

In the event that any of the sites came forward before Rushden East SUE then additional capacity would need to be provided at existing schools (Rushden and Higham Ferrers). There is a lack of safe access over the A6 to existing schools although the site is adjacent to the Rushden Primary Academy, but separated by the A6 Bypass. There would be the potential for pupils to access this school (with mitigation measures in place) and as delivered in the proposed Rushden SUE to the north.

The site provides a freestanding development opportunity to the south east of the existing urban area. Development could be implemented entirely independently of Rushden East. It is situated within a 40mph zone along the A6, so could represent a logical addition to the existing urban area, providing for potential longer term connectivity options to Rushden East, to the north.

It is also noted that development of this site is well related to redevelopment of the Manor Park playing fields/Rugby Club site opposite. The capacity of the Manor Park site has already been reduced from 200 to 150 dwellings, due to constraints associated with the former landfill site. The proposed site could also help to offset the reduced developable area at Manor Park.

### Key potential opportunities

| Could be delivered in advance of the major road infrastructure required for the Rushden East development – if the roundabout can be upgraded to provide a viable fourth exit point. |
| Site with few specific development constraints, currently in single ownership and being actively promoted by Bellway Homes. |
| Could be developed in association with proposed redevelopment/relocation of Rugby Club to the east of the A6 Bypass (adjacent to John White Golf Course). |

### Key potential constraints

| Safe A6 crossing and roundabout improvements required to A6 and southern roundabout. |

### Conclusion:

The southern option could provide an opportunity for a self-contained and urban extension, entirely separate to the Rushden East SUE. It could represent an opportunity to open up further development opportunities to the south east of the urban area and, in the short term, could come
forward in association with the proposed relocation and redevelopment of the Rugby Club site at Manor Park, Bedford Road.

Despite few specific development constraints, there are some challenges to delivering the site. In particular, development would entail improvements to the Bedford Road (A6) roundabout and the provision of improvements to pedestrian and cycle crossings across the A6.

The site scores well in terms of both availability and deliverability, given that it is in a single ownership and is being promoted by a national housebuilder (Bellway Homes), that already has development options on the land.
Site 4 – Land west of Slater’s Lodge, Newton Road, Higham Ferrers

View of site from main potential point(s) of access

View from western boundary into western part of site (potential Phase 1)

View south into western part of site from Newton Road, Higham Ferrers (potential Phase 1)
Land west of Slater’s Lodge, Newton Road, Higham Ferrers

Other references: SHLAA

<table>
<thead>
<tr>
<th>Site Area: 19 ha</th>
<th>Proposed mix of uses: Residential, plus structural landscaping and/or other ancillary non-residential uses</th>
</tr>
</thead>
</table>

**Uses:**

**Site Description:**

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proximity to services</td>
<td>There are employment, healthcare, school and shopping facilities in Higham Ferrers but they are not easily accessible without a car. The nearest such facility is Ferrers School, approximately 1.2km walking distance. Otherwise, details of the nearest services and facilities are as follows:</td>
</tr>
<tr>
<td></td>
<td>• Higham Ferrers GP surgery – 1.8km (via PROW UK2/ Greenway);</td>
</tr>
<tr>
<td></td>
<td>• Ferrers School – 1.2km (via PROW UK2/ Greenway);</td>
</tr>
<tr>
<td></td>
<td>• Convenience retailing/ town centre centre services/ facilities (Asda, Rushden) – 1.7km (via John Clark Way);</td>
</tr>
<tr>
<td></td>
<td>• Higham Town FC pitches, Newton Road – 850m.</td>
</tr>
<tr>
<td>Proximity to a trunk/ principal road junction</td>
<td>1.2km from the A6, via Newton Road, although improved access may be possible by way of a new access road from the John Clark Way roundabout</td>
</tr>
<tr>
<td>Connectivity to the existing urban area</td>
<td>The site is classified Grade C in the 2015 Urban Structures Study (NNJPDU). However, while this sector of the Rushden/ Higham Ferrers urban area generally has better opportunities than the south east, in isolation (i.e. independent of Rushden East) there is little opportunity for connectivity.</td>
</tr>
<tr>
<td></td>
<td>Two public footpaths bisect the site (VC9 and VC10). One then links to 2 other paths which lead to Higham Ferrers (UK2 and UK3) but the routes are lengthy. They also involve crossing the A6 and only one has a footbridge. Issues with connectivity to adjacent Urban area will not improve until the Rushden East Sustainable Urban Extension is developed.</td>
</tr>
<tr>
<td></td>
<td>The County Highway Authority agrees that the site is poorly served in terms of sustainable pedestrian and cycleway links and considers that improvements are required along Kimbolton Road into Higham Ferrers.</td>
</tr>
<tr>
<td></td>
<td>Additional Highway Authority comments (July 2020) – It is paramount that access is taken through the Rushden East site as Newton Road would require significant upgrade in terms of width and pedestrian / cycleway links.</td>
</tr>
<tr>
<td>Access infrastructure</td>
<td>If developed ahead of Rushden East, new access infrastructure for the site would be required along Newton Road (see concerns from Highway Authority</td>
</tr>
</tbody>
</table>

East of Rushden – assessment of additional development options

August 2020
| **Capacity of the highway network** | The County Highway Authority advises Newton Road is in poor condition and undulating with some potential width constraints. Therefore NCC strongly advises that this site is served from the proposed Rushden East development rather than attempt to upgrade Newton Road. Highways England (HE) has no objections in principle if one or a combination of these sites was allocated for up to 500 dwellings. This is because HE considers that the traffic impacts of the proposed development on the Strategic Road Network (SRN) can be assessed through a Transport Assessment (TA). The TA can also identify any mitigation that may be required to be provided on the SRN to accommodate the additional traffic from the development quantum that has been proposed. |
| **Utilities** | Based on findings in 2011 update to the SHLAA |
| **Impact of an existing notifiable installation, including pipelines, on the development** | No known constraints of this nature on site |
| **Impact on existing sports and recreation facilities, including allotment land** | Site is solely agricultural and not in sports/recreation use. It is bisected by two PROWs, but these should be expected to be retained as part of any development. |
| **Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development** | This site is set back some distance from the A6 Bypass. As such, there are no known conflicts in immediate proximity. |
| **Impact of the development on neighbouring land uses** | Would not conflict with uses in immediate proximity |
| **Impact on biodiversity** | Natural England advised (August 2020) that all sites proposed carry a risk of recreational pressure on the SPA beyond that anticipated within the Mitigation Strategy. Therefore, like Rushden East SUE, they will all require bespoke mitigation options to address this in order to achieve sustainable development, which is Habitats Regulations compliant. Natural England also noted that this option presents a favourable opportunity for SANGS continuity with the Rushden East SUE proposed country park. Natural England (NE) previously advised (autumn 2019) of the need for a search for protected species and historic environment interests as well as an assessment for potential Functionally Linked Land (FLL). This is due to the site being situated within the 3km consultation zone for the Upper Nene Gravel Pits SPA/Ramsar site, albeit physically separated by the Higham Ferrers urban area. Accordingly, residential |
units would need to contribute towards mitigating the impact of development upon the SPA.

Notwithstanding, NE considers this site low in terms of risk to the integrity of the SPA. However, this issue still requires careful consideration and substantial high quality on site green infrastructure would still be required, as well as bespoke contributions to mitigation measures off site. Finally, NE advises use of the Habitat Opportunity Mapping dataset to assess the potential for the site to be restored to provide a net gain for biodiversity and strengthen the ecosystem services provided by that location NE would also need to agree any required mitigation, by way of a project level Appropriate Assessment, and planning conditions to secure the required mitigation measures.

Impact on visual landscape

Site not assessed in the Environmental Sensitivity report from October 2009 commissioned by the North Northamptonshire Joint Planning Unit.

However, during July 2020 officers undertook an assessment of the site. It was found to comprise arable fields, predominantly cultivated with a barley crop. Visually the land appears to be flat. A number of significant hedgerows with occasional mature trees were identified, but no particularly distinctive features were noted.

Impact on heritage

The County Archaeological Advisor has advised that development would be likely to have a significant negative impact on the historic environment. Therefore, further information regarding archaeological significance in the form of archaeological assessment would be needed.

The adjacent property known as Slater’s Lodge contains a number of older stone buildings. In a Committee Report for a recent planning application for a conversion of these, they are regraded as a non designated heritage asset. Development is not considered to significantly impact on these and there are no listed buildings etc on or immediately adjacent to the site.

Impact on the existing form of the settlement

By itself, the site in an isolated location not associated with the current built form of Higham Ferrers/ Rushden.

However, in the longer term the site would become enclosed by (and ultimately form part of) the built form of the Rushden East SUE.

Flood risk

The site is entirely within Flood Zone 1. The Environment Agency raised no concerns.

The Lead Local Flood Authority (LLFA) advised (July 2020), reflecting the Strategic Flood Risk Assessment (February 2020) that there are two
significant surface water flow paths across the site – both are associated with the two ordinary watercourses (tributaries of Chelveston Brook) which flow through the site, north through the middle of the Phase 1 site and north-west along the northern boundary of the Further Phases site. The two ordinary watercourses within the site boundary will need to be protected, no works within 9m without land drainage consent. The surface water flood risk areas associated with these watercourses will need to be preserved. No groundwater flood risk within the site boundary. There are no records of historic flooding in the area although this does not mean flooding has never or will never occur.

| Impact on the use of previously developed land | Site not previously developed and ENC Environmental Protection advises there are no known landfill sites on or within 250m of the area of interest. |
| Impact on the quality of agricultural land | Site is Grade 3 agricultural land. However, in the context of the size of the site compared to a large amount of other remaining Grade 3 land in the vicinity, this is not considered sufficient to put a constraint on development. |
| Impact on the stock of minerals | Site not identified for mineral extraction in the County Council’s Minerals and Waste Local Plan. However, the site is partially within a minerals safeguarding area and the mineral being safeguarded here is river valley sand and gravel. Therefore these are aggregates which should be safeguarded where appropriate. Any development here would need to comply with Policy 28 of the Minerals and Waste Local Plan (either the landowner would have to prove the mineral is not viable or it should be extracted prior to development taking place). |
| Availability | The site is subject to a request for pre-application advice which is an indication of its availability |
| Deliverability | Undeliverable in the short term, independent of the Rushden East Sustainable Urban extention. Would need to be incorporated as a Rushden East development phase. |
| SHLAA category | Site not assessed, but assumed to be Category 3 on the basis of nearby site assessment (reference 1069) |
| Planning Policy | Most closely associated with Higham Ferrers. This is a market town which, although being second in the hierarchy of preferred locations for development in the JCS (Table 1/ Policy 11), is specified (alongside Burton Latimer) as being a location where growth should be directed to the nearest Growth Town (i.e. Rushden). |
| Other matters | NCC Education (July 2020) advises that the site lies to the east of the A6, and as such connectivity between the development and existing schools in Rushden/ Higham Ferrers would be a concern, with no suitable safe walking routes currently available. |

In the event that any of the sites came forward before...
Rushden East SUE then additional capacity would need to be provided at existing schools. There is a lack of safe access over the A6 to existing schools in Rushden/ Higham Ferrers. Delivered in isolation, the site is not realistically accessible for local schools and would potentially create a need for school transport to be provided, being over 1.5 miles distant from the nearest primary provision. The recently consented nearby Chelveston Road school site (due to open September 2021) is Special Educational Needs (SEN) facility and as such is unavailable to mainstream pupils.

Notwithstanding, it is noted that the site would be on land adjacent to the proposed Rushden East SUE, and as such could be accessible through that development. The SUE by itself is expected to provide 2x primary schools and 1x secondary school, and discussions are underway with the promoters to secure sufficient land within the development to enable expansion of primary capacity on site above that which would be required to mitigate the SUE by itself, as well as delivering a secondary school of sufficient scale to accommodate increasing demand for places in the wider Rushden / Higham Ferrers area. It would therefore be expected that the additional 500 homes proposed for this site could contribute financially towards that provision through a s106 agreement, and that appropriate access routes could be designed into the development from an early stage to allow pupils to move between the sites.

### Key potential opportunities

<table>
<thead>
<tr>
<th>Key potential opportunities</th>
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<tbody>
<tr>
<td>Some potential if associated with the Rushden East Sustainable</td>
</tr>
<tr>
<td>Urban Extension.</td>
</tr>
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</table>

### Key potential constraints

<table>
<thead>
<tr>
<th>Key potential constraints</th>
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</thead>
<tbody>
<tr>
<td>The site is located on the opposite side of the A6 to</td>
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<tr>
<td>Higham Ferrers and Rushden and is currently physically</td>
</tr>
<tr>
<td>separated from these settlements and the facilities they offer.</td>
</tr>
</tbody>
</table>

| Significant improvements to Newton Road would be needed if     |
| developed in advance of Rushden East.                           |

| The site is not currently integrated into the built form of     |
| any adjacent settlement                                         |

| Archaeological assessment required.                             |

### Conclusion:

The site has been put forward within the context of the proposed Rushden East Masterplan. On behalf of the owners, Gladman submitted for consideration as a consultation response to the Allocated Sites consultation for the Local Plan Part 2, February 2020. However, the broad area of search referred to in the Gladman representation relates specifically to the delivery of a SUE for Rushden East (Policy 33 of the NNJCS).

Gladman has acknowledged that Slaters Lodge is not considered as suitable for development independently of the Rushden East SUE. The location is too remote from both Rushden and Higham Ferrers town centres and has poor access to facilities and services, which prior to the construction of the SUE, do not exist to the east of the A6. The location is considered to be poorly integrated with the form of the settlement of Rushden.
The site offers some potential in the longer term, if it were to be developed in conjunction with the Rushden East Sustainable Urban Extension (SUE). However, as the purpose of this study is to find a deliverable site that could be brought forward independently of Rushden East (i.e. not bound by the infrastructure requirements associated with the SUE) within the current Plan period, so it should be discounted at this time. This is due to the extent of highway improvements required, if it was to be developed in isolation; the poor connectivity/integration with Rushden and Higham Ferrers; plus the lack of integration with the built form of any nearby settlement. Finally, further work is required to investigate the archaeology and other constraints of the area.
## Appendix 3 – Summary site assessment matrix

| Site | Proximity to services | Proximity to trunk/principal road junction | Connectivity to existing urban area | Access infrastructure | Capacity of highway network | Ease of utility provision | Impact of an existing notifiable installation, including pipelines, on the development | Impact on existing sports and recreation facilities | Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development | Impact of the development on neighbouring land uses | Impact on biodiversity | Impact of the development on a protected species or on a site recognised for its wildlife or geological importance | Impact on visual landscape | Impact on heritage | Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens | Impact on the existing form of the settlement | Impact on flood risk | Impact on the use of previously developed land | Impact on the quality of agricultural land | Impact on the stock of minerals | Availability | Deliverability | SHLAA category | Or equivalent estimate | Planning Policy | Other matters |
|------|----------------------|------------------------------------------|-------------------------------------|-----------------------|--------------------------|---------------------------|-------------------------------------------------|------------------------------------------------|-------------------------------------------------|-------------------------------------------------|-------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|------------------------------------------------|
| 1.   | ![Proximity to services](image1.png) | ![Proximity to trunk/principal road junction](image2.png) | ![Connectivity to existing urban area](image3.png) | ![Access infrastructure](image4.png) | ![Capacity of highway network](image5.png) | ![Ease of utility provision](image6.png) | ![Impact of an existing notifiable installation, including pipelines, on the development](image7.png) | ![Impact on existing sports and recreation facilities](image8.png) | ![Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development](image9.png) | ![Impact of the development on neighbouring land uses](image10.png) | ![Impact on biodiversity](image11.png) | ![Impact of the development on a protected species or on a site recognised for its wildlife or geological importance](image12.png) | ![Impact on visual landscape](image13.png) | ![Impact on heritage](image14.png) | ![Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens](image15.png) | ![Impact on the existing form of the settlement](image16.png) | ![Impact on flood risk](image17.png) | ![Impact on the use of previously developed land](image18.png) | ![Impact on the quality of agricultural land](image19.png) | ![Impact on the stock of minerals](image20.png) | ![Availability](image21.png) | ![Deliverability](image22.png) | ![SHLAA category](image23.png) | ![Or equivalent estimate](image24.png) | ![Planning Policy](image25.png) | ![Other matters](image26.png) |
| 2.   | ![Proximity to services](image1.png) | ![Proximity to trunk/principal road junction](image2.png) | ![Connectivity to existing urban area](image3.png) | ![Access infrastructure](image4.png) | ![Capacity of highway network](image5.png) | ![Ease of utility provision](image6.png) | ![Impact of an existing notifiable installation, including pipelines, on the development](image7.png) | ![Impact on existing sports and recreation facilities](image8.png) | ![Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development](image9.png) | ![Impact of the development on neighbouring land uses](image10.png) | ![Impact on biodiversity](image11.png) | ![Impact of the development on a protected species or on a site recognised for its wildlife or geological importance](image12.png) | ![Impact on visual landscape](image13.png) | ![Impact on heritage](image14.png) | ![Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens](image15.png) | ![Impact on the existing form of the settlement](image16.png) | ![Impact on flood risk](image17.png) | ![Impact on the use of previously developed land](image18.png) | ![Impact on the quality of agricultural land](image19.png) | ![Impact on the stock of minerals](image20.png) | ![Availability](image21.png) | ![Deliverability](image22.png) | ![SHLAA category](image23.png) | ![Or equivalent estimate](image24.png) | ![Planning Policy](image25.png) | ![Other matters](image26.png) |
| 3.   | ![Proximity to services](image1.png) | ![Proximity to trunk/principal road junction](image2.png) | ![Connectivity to existing urban area](image3.png) | ![Access infrastructure](image4.png) | ![Capacity of highway network](image5.png) | ![Ease of utility provision](image6.png) | ![Impact of an existing notifiable installation, including pipelines, on the development](image7.png) | ![Impact on existing sports and recreation facilities](image8.png) | ![Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development](image9.png) | ![Impact of the development on neighbouring land uses](image10.png) | ![Impact on biodiversity](image11.png) | ![Impact of the development on a protected species or on a site recognised for its wildlife or geological importance](image12.png) | ![Impact on visual landscape](image13.png) | ![Impact on heritage](image14.png) | ![Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens](image15.png) | ![Impact on the existing form of the settlement](image16.png) | ![Impact on flood risk](image17.png) | ![Impact on the use of previously developed land](image18.png) | ![Impact on the quality of agricultural land](image19.png) | ![Impact on the stock of minerals](image20.png) | ![Availability](image21.png) | ![Deliverability](image22.png) | ![SHLAA category](image23.png) | ![Or equivalent estimate](image24.png) | ![Planning Policy](image25.png) | ![Other matters](image26.png) |
| 4.   | ![Proximity to services](image1.png) | ![Proximity to trunk/principal road junction](image2.png) | ![Connectivity to existing urban area](image3.png) | ![Access infrastructure](image4.png) | ![Capacity of highway network](image5.png) | ![Ease of utility provision](image6.png) | ![Impact of an existing notifiable installation, including pipelines, on the development](image7.png) | ![Impact on existing sports and recreation facilities](image8.png) | ![Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development](image9.png) | ![Impact of the development on neighbouring land uses](image10.png) | ![Impact on biodiversity](image11.png) | ![Impact of the development on a protected species or on a site recognised for its wildlife or geological importance](image12.png) | ![Impact on visual landscape](image13.png) | ![Impact on heritage](image14.png) | ![Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens](image15.png) | ![Impact on the existing form of the settlement](image16.png) | ![Impact on flood risk](image17.png) | ![Impact on the use of previously developed land](image18.png) | ![Impact on the quality of agricultural land](image19.png) | ![Impact on the stock of minerals](image20.png) | ![Availability](image21.png) | ![Deliverability](image22.png) | ![SHLAA category](image23.png) | ![Or equivalent estimate](image24.png) | ![Planning Policy](image25.png) | ![Other matters](image26.png) |
## Appendix 4 – Numerical site assessment (by ranking)

<table>
<thead>
<tr>
<th>Site</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
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<tbody>
<tr>
<td>\text{Land surrounding 170-184 Newton Road}</td>
<td>Linear growth between A6 roundabout and 250 Newton Road</td>
<td>Land east of the A6 Bypass/ west of John White Golf Club, Bedford Road</td>
<td>Land west of Slater’s Lodge, Newton Road, Higham Ferrers</td>
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<tr>
<td>\text{&quot;Northern&quot; option}</td>
<td>\text{&quot;Linear&quot; option}</td>
<td>\text{&quot;Southern option&quot;}</td>
<td>Rushden East extension</td>
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<td>\hspace{1cm}Education</td>
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<tr>
<td>\hspace{1cm} Convenience retailing</td>
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<td>\hspace{1cm}Leisure</td>
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<td>Proximity to trunk/principal road junction</td>
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<td>4</td>
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<td>Connectivity to existing urban area</td>
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<td>Access infrastructure</td>
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<td>Capacity of highway network</td>
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<tr>
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<td>Impact of existing noise or odour (major road, railway, domestic waste disposal site or other source) on the development</td>
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<td>Impact of the development on neighbouring land uses</td>
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<td>Impact of the development on a protected species or on a site recognised for its wildlife or geological importance</td>
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<td>Impact on heritage</td>
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</tr>
<tr>
<td>Impact on listed buildings, conservation areas, scheduled ancient monuments and historic parks/gardens</td>
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<td>Impact on flood risk</td>
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<td>Impact on the use of previously developed land</td>
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<td>Impact on the quality of agricultural land</td>
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<td>Deliverability</td>
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<td>SHLAA category</td>
<td>Or equivalent estimate</td>
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<td>Planning Policy</td>
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<td>4</td>
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<tr>
<td>Other matters</td>
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<td><strong>TOTAL RANKED SCORING</strong></td>
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