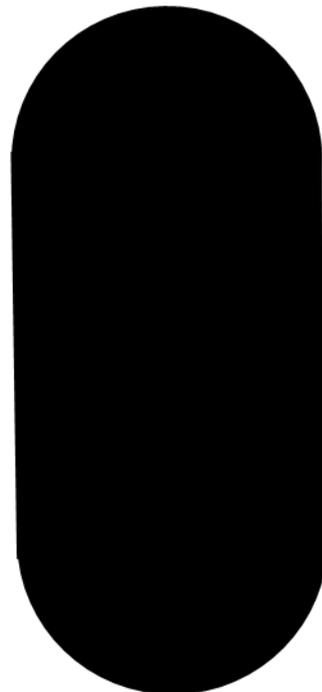
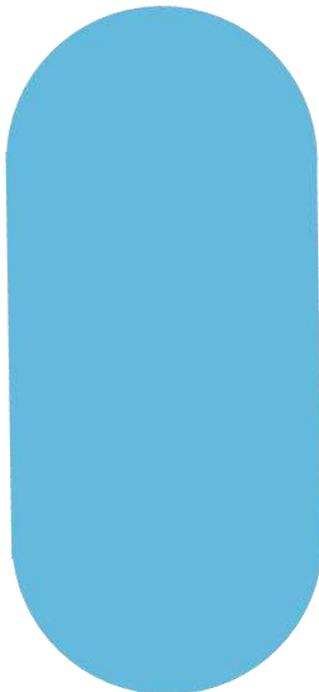
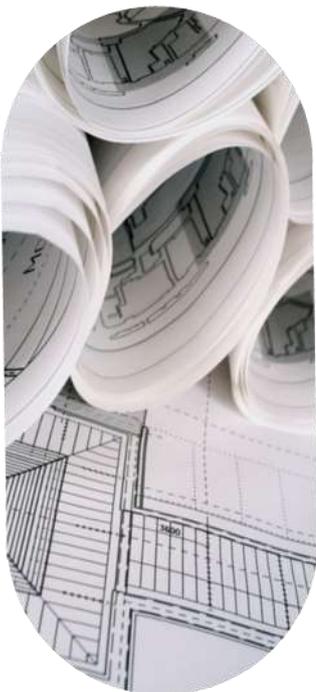


**BELLWAY HOMES LIMITED**

**OUTLINE PLANNING APPLICATION FOR THE RESIDENTIAL  
DEVELOPMENT OF LAND EAST OF THE A6, RUSHDEN**

**PLANNING STATEMENT**

**MAY 2022**





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## APPENDICES

A	Pre Application Advice
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## 1. INTRODUCTION

- 1.1.1 This Planning Statement has been prepared by Marrons Planning on behalf of Bellway Homes Limited (“the Applicant”), and forms part of their outline planning application for the residential development of land to the east of the A6 in Rushden. All matters are reserved for future determination, save for the access into the site from the A6 / Bedford Road roundabout.
- 1.1.2 The application site is edged in red on the submitted Location Plan and is a draft allocation in the emerging Part 2 Local Plan for East Northamptonshire. The Part 2 Local Plan is currently at Examination stage and the hearings commenced in April 2022.
- 1.1.3 Draft Policy EN28 (Land east of the A6/ Bedford Road) is the relevant policy, and proposes to allocate the site for a residential development of around 450 dwellings, together with associated supporting infrastructure, to include a mix of supporting ancillary retail, business or community uses. The draft policy sets out a series of criteria to shape the development of the site.
- 1.1.4 For the purposes of this outline application, the submitted Site Location Plan and Parameters Plan define the extent and key elements of the development. The proposals are further described in the Design and Access Statement whilst the Illustrative Masterplan shows one way in which the 450 homes could be delivered on site.
- 1.1.5 This Planning Statement describes the proposed development and provides an assessment against the development plan, having regard to material considerations. They include the Part 2 Local Plan, which sets out the Council’s preferred development strategy to meet the housing requirement of the North Northamptonshire Joint Core Strategy. The draft allocation reflects the Core Strategy’s intention to focus development at Rushden and demonstrates the Council’s desire for the site to be developed for housing.



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- 1.1.6 The Planning Statement draws upon evidence included in the application submission, including the Environmental Statement (ES) and other technical reports, such as the Transport Assessment and Flood Risk Assessment.



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## 2. SITE DESCRIPTION, CHARACTERISTICS AND SURROUNDINGS

### 2.1 Introduction

2.1.1 The site and its characteristics are described in detail within the Design and Access Statement. The relevant matters for the purpose of this statement are:

- The site is approximately 23.70 hectares and is in agricultural use. The land comprises two arable fields, separated by a wet ditch and hedgerow. The application red line boundary also includes the access roundabout.
- The site is not designated for its environmental or landscape value. It is a draft allocation in the emerging Part 2 Local Plan for East Northamptonshire.
- The landform slopes gently across the site, rising to localised ridgelines in the north-east, at 90-95m AOD, and the east and south-east at 85-90m AOD.
- There are agricultural fields between the site and Newton Road to the north, with land to the north of Newton Road forming part of the Rushden East Sustainable Urban Extension strategic housing allocation. An outline planning application has been submitted and a decision is pending.
- There are further agricultural fields to the east. Land at the eastern boundary is being promoted for a community facility and rugby pitches by Rushden Town Council. A detailed planning application (reference 20/01174/FUL) has been submitted and a decision is pending. Access to this development would be taken through the application site.
- The Rushden Golf Range and Rushden Foot Golf are located to the south of the site, as is The John White Golf Club.
- The Rushden built up area is present to the west, beyond the A6. Rushden contains a full range of services and facilities.



- The wet ditch present forms a valley through the site and onwards beneath the A6, which is present to the west of the site. A Public Right of Way (Footpath UK9) passes to the south of the wet ditch, between the A6 and wider countryside.
- Further south, a water main runs beneath the site from east to west. There are no other above or below ground utilities. There are no buildings present on the site.
- There are few features of interest. Limited hedgerows and field margins exist, mostly comprised of tall ruderal vegetation and poor semi-improved grassland (all of low ecological value).
- Visibility from the surrounding area is largely screened by the combination of topography and mature vegetation.
- There is a good network of pedestrian footpaths and cycle routes throughout Rushden, but no footways at the A6/ Bedford Road roundabout. There is a footway along the eastern side of Bedford Road.
- The nearest bus stops are on the A6 opposite the golf club and on Bedford Road outside the current Rushden Rugby Club site.

## 2.2 Summary

- 2.2.1 The site is a proposed allocation for around 450 dwellings in the Draft Part 2 Local Plan and is a sustainable location for development, being well related to the Rushden built up area and future development to the north within the Rushden East SUE. The site is not designated for its environmental value and has few features of interest. The site is well contained within the wider landscape and relates well to the settlement of Rushden.



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## 3. DESCRIPTION OF THE PROPOSAL

### 3.1 Introduction

3.1.1 The proposal is for the residential development of the site as a draft allocation in the emerging Local Plan Part 2 for East Northamptonshire. The planning application is made in outline with all matters reserved, except for vehicular access from the A6/ Bedford Road.

3.1.2 The application seeks to establish the scale and nature of the development. A Parameters Plan is submitted for approval that identifies the key principles. This plan will form the basis of future detailed proposals.

3.1.3 The Design and Access Statement (DAS) describes the proposals in detail. The matters relevant to this Statement are:

- The development will contribute up to 450 dwellings (Use Class C3) towards local housing supply of which up to 135 (30%) would be affordable;
- A community / retail and or health facility is proposed within the site, to help support the new community.
- Green infrastructure totalling 9.83ha (41.5% of the site) will be provided, including areas of public open space, retained vegetation and space for new tree planting, biodiversity and sustainable urban drainage.
- Vehicular access (for which detailed permission is sought) will be directly from the existing Bedford Road / A6 Bypass roundabout, which will be modified.
- The development facilitates new pedestrian connections across the A6 by including a new signalised crossing. The existing footway along the Bedford Road will be improved, connecting it to the footway / cycle way further north.
- The internal road network will comprise link and distributor roads, and will be designed to promote walking and cycling. The proposals also include pedestrian and cycle routes within the site and connections to established routes to existing facilities locally.



- The proposals could facilitate pedestrian access to Newton Road north of the site, and towards the Rushden East Sustainable Urban Extension via a footpath using existing field margins. There will also be links to the wider countryside to the east of the site.
- The scheme provides for access to the proposed community facility and rugby pitches at the eastern site boundary, which is the subject of a separate planning application by Rushden Town Council. The community facility will share the same access and utilise the internal road network.
- The density of development will vary across the site, with scope for areas of higher density along the avenues and higher order streets with areas of lower density along the site edges. Development will contain a mix of 2 & 2½ storey dwellings, and a limited number of 3 storey dwellings.
- Existing site features of interest such as hedgerows will be retained, unless necessary to be removed to enable development. The wet ditch will be incorporated into an attractive green corridor, which will also accommodate the section of Public Right of Way that runs alongside it.
- Although the details do not form part of the current outline application, a mix of house types and sizes can be provided to meet the housing needs of the community. The detailed design of the dwellings will be the subject of future reserved matters submissions to the Council.

## 3.2 Summary

- 3.2.1 The proposed development has been designed having regard to the site and its context, development plan policies, the principles set out in the draft Part 2 Local Plan allocation, associated policies and local guidance.
- 3.2.2 The development will create an attractive residential suburb with areas of open space and landscaping. There will be a good relationship to the existing built up area with good connections to nearby facilities.



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## 4. ASSESSMENT OF THE PROPOSAL AGAINST THE DEVELOPMENT PLAN

### 4.1 Introduction

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.1.2 The development plan consists of the North Northamptonshire Joint Core Strategy (JSC) (adopted 2016), the saved policies of the East Northamptonshire District Local Plan (adopted 1996), and the Rushden Neighbourhood Plan (made 2018). Material considerations include the National Planning Policy Framework (the “NPPF” or “Framework”) and the emerging East Northamptonshire Local Plan Part 2 (Submission Plan – March 2021).
- 4.1.3 In view of the advanced stage of the emerging Part 2 Local Plan and the limited objections to the draft allocation, the policies have been considered here alongside the policies of the adopted plan. In accordance with Paragraph 48 of the NPPF, it can be given significant weight in determining the application, having regard to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
  - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
  - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
- 4.1.4 The assessment in this section draws on the Design and Access Statement, Environmental Statement and the technical reports submitted with the application, which should be read alongside them.



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## 4.2 Housing Policies

- 4.2.1 The adopted Joint Core Strategy deals with strategic issues across the Kettering, Corby, Wellingborough and East Northamptonshire areas. It allocates strategic sites (defined as 500 dwellings more) and sets out the overall spatial strategy, the required level of growth and its distribution across the plan area.
- 4.2.2 The Joint Core Strategy promotes sustainable development and identifies Rushden as a 'Growth Town'. It is the focus for new major co-ordinated regeneration and growth in employment, housing, retail and higher order facilities. Policy 29 of the Joint Core Strategy establishes a housing requirement of 3,285 dwellings for Rushden over the period 2011-2031 (39.11% of the total JCS requirement for the East Northamptonshire area).
- 4.2.3 Policy EN1 (Spatial development strategy) of the Part 2 Local Plan specifically states that major development will be concentrated upon the Rushden East Sustainable Urban Extension (located to the north of the application site) and 'land to the east of the A6/Bedford Road' in accordance with the Joint Core Strategy. Although the site falls beyond the current settlement boundary for Rushden (as established by Policy H1 of the Rushden Neighbourhood Plan), the draft allocation and application site is consistent with the strategy for locating development in North Northamptonshire.
- 4.2.4 Policy EN28 (Land east of the A6/ Bedford Road, Rushden) is the draft allocation policy in the Part 2 Local Plan, and proposes to allocate the site for '*residential development together with supporting infrastructure, which should include a mix of ancillary retail, business or community uses to support the proposal*'. The policy states a design led masterplan is to be agreed by the local planning authority as part of the application process, which will address all relevant requirements.
- 4.2.5 The outline proposals have benefited from an iterative design process informed by inputs from technical disciplines and the local planning authority officers. The proposed development satisfies the key principles set out in draft Policy EN28 by:
- Accommodating a development of up to 450 dwellings.



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- Providing an opportunity for a mix of housing with 30% affordable housing.
  - Making provision for a community / retail / and or health facility to support the needs of the new residents.
  - Taking vehicular access taken directly from the Bedford Road/ A6 Bypass roundabout (for which full planning permission is sought);
  - Retaining the Public Right of Way that passes through the site, and securing landscape improvements to enhance its setting;
    - Providing pedestrian and cycle connections to the surrounding urban area, and to adjacent sports and recreational facilities. Specifically, a 3m footway will be provided on the northern side of the access road and around the A6/ Bedford Road roundabout, connecting to the existing footway on Rushden Road, which will in turn be improved to a footway/ cycleway. It will cross the A6 via a signalised Toucan Crossing.
    - An opportunity for improved local bus connections to the site, which will be discussed with the Highway Authority. This could include diverting a bus service along the Rushden Road/ A6. The internal access roads can be designed to accommodate any future bus diversion.
    - Delivering biodiversity enhancements to the site and green infrastructure corridors. The new development, including extensive Green Infrastructure, will be set within the existing field boundaries and can deliver a net biodiversity gain.
    - Delivering improvements to the existing A6/ Bedford Road roundabout and reserving an access route to the proposed community hub and rugby pitches at the eastern site boundary.



- Incorporating appropriate mitigation measures to protect the integrity of the Upper Nene Gravel Pits Special Protection Area (SPA). The extensive areas of Green Infrastructure and public open space available to the new population will limit any increase in recreational pressures at the SPA.
- Multi-functional structural landscaping including sustainable urban drainage systems (SuDS), with development set back from the western site boundary to mitigate noise and air pollution arising from the A6 Bypass.

4.2.6 In reserving land for a community / retail / and or health facility, the proposals comply with Core Strategy Policy 7 (Community services and facilities). The exact form of the facility is still to be determined and in the event any retail element exceeds 280sqm, a retail impact assessment will be provided with the reserved matters details. This approach has been agreed with officers to meet the requirements of Policy EN22 of the Part 2 Local Plan.

4.2.7 The policy requirement to provide a landmark feature at the main access point into the site, adjacent to the A6 / Bedford Road roundabout, is noted. This will be taken into account as part of the detailed design and details included at the reserved matters stage.

4.2.8 Both the draft allocation policy and EN30 (Housing mix and tenure to meet local need) require a suitable housing mix and range to meet local need and demand, whilst Policy EN31 (Older people's housing provision) promotes 10% housing for older people (supported by Policy H4 of the Rushden Neighbourhood Plan).

4.2.9 The requirements of these draft policies are noted. At this outline stage, approval of the housing mix is not sought and will be determined as part of the detailed design and included in reserved matters submissions. This approach has been discussed and agreed with the Council as part of pre-application discussions.

4.2.10 Policy EN29 (Delivering wheelchair accessible housing) states that the development should provide 5% wheelchair accessible housing. As approval for the detailed design of the proposed dwellings is not sought as part of the outline application, this would be addressed at the reserved matters stage.



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4.2.11 The requirements of Policy EN32 (Self and custom build housing), in terms of the availability of serviced plots for self and custom build housing in suitable locations. The Applicant responded to the Publication Draft Local Plan Part 2 consultation, setting out that large housing sites do not lend themselves to the provision of self-build or custom properties. Any requirement arising from the Part 2 Local Plan policy is best addressed at the detailed design / reserved matters stage.

4.2.12 The requirements of Core Strategy Policy 9 (Sustainable buildings) are similarly noted, in terms of the need to ensure high standards of resource and energy efficiency and a reduction on carbon emissions. The specific requirements for residential and non-residential buildings will be addressed at the construction stage.

### 4.3 Design Policies

4.3.1 Core Strategy Policy 8 (North Northamptonshire place shaping principles) sets out a series of criteria to achieve high quality development. In addition, Neighbourhood Plan Policy EN1 (Design in Development) requires that all new developments be of a high quality design, and sets out further design criteria. Neighbourhood Plan policies also address landscaping in new development (Policy EN2) and the creation of safe and attractive public spaces (Policy EN4).

4.3.2 Planning permission for the layout, scale, and appearance of the development is not sought as part of the current application, and will be addressed as part of detailed design and within future reserved matters submissions. The Parameters Plan establishes nature and scale of development. At this outline stage, the Illustrative Masterplan demonstrates the site can accommodate the 450 dwellings proposed, having regard to relevant constraints and opportunities, and development plan policies (adopted and emerging).

4.3.3 The Design and Access Statement documents the design process in detail, and the rationale for the decisions taken to date. Section 5 of the DAS provides an assessment of the design principles and emerging layout against the Policy 8 requirements, demonstrating:



- A connected place, facilitating access across the A6 and creating attractive walking and cycling routes that connect with existing routes, including the retained public right of way through the site.
- A clear movement framework to promote safe and pleasant streets and spaces, with a good relationship between development parcels and open spaces to promote natural surveillance.
- An opportunity to provide a mix of dwellings and supporting uses to promote an adaptable, diverse and flexible place;
- A framework to respect the local vernacular of Rushden and surrounding settlements, in terms of the built form, key buildings and materials etc.
- Green infrastructure that conserves and improves existing features.

4.3.4 The emerging design proposals were amended in response to officer advice, in which the principal access through the site was centralised to promote access to the development sites north of the site. It is anticipated that the Illustrative Masterplan can be agreed with the authority, as the application is determined, in accordance with Policy EN28.

#### 4.4 Green Environment, Design and Heritage Policies

##### Landscape Character

4.4.1 Core Strategy Policy 3 (Landscape Character) states that development should be located and designed in a way that is sensitive to its landscape setting, retaining and, where possible, enhancing the distinctive qualities of the landscape character, which it would affect.

4.4.2 The Landscape and Visual Impact Assessment (LVIA) assesses the landscape impact of the proposal, and its findings are set out in the Environmental Statement. In accordance with criterion 'a' of Policy 3, the parameters for the development have been designed to conserve and enhance the character and qualities of the local landscape, and are based on a clear understanding of the existing conditions.



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- 4.4.3 With reference to criterion 'b', existing landscape features (the mature trees, scrub and hedgerows) will be retained, as far as practicable, reinforced, and enhanced to strengthen the character of the site. A strong framework of GI will include new perimeter landscape planting, providing a robust green edge to the development and additional containment from the wider countryside to the north and east.
- 4.4.4 Structural planting will be introduced along green corridors, connecting with each other and areas of open space. The retained mature hedgerow, drainage ditch and PRoW running through the centre of the site will form a strong green spine and greenway, and new planting will be introduced along the primary road, more minor roads where practicable, and within the public open space
- 4.4.5 In terms of views and vistas (criterion 'd'), existing and new landscaping will help to break up the built development roofscape, soften the overall appearance of the new buildings, and assist in filtering views generally, providing increased visual and physical connectivity to the established site vegetation. Additionally, the proposed development recognises the recommendations for open space provision within North Northamptonshire and provides 9.83ha GI, amounting to 41.5% of the total site area.

#### Open Space Provision

- 4.4.6 Policy EN10 (Enhancement and provision of open space) of the Part 2 Local Plan confirms that development is required to contribute to the enhancement and provision of open space to meet the needs of the population arising from the development. Neighbourhood Plan Policy CL2 requires the provision of semi-natural play space or children's play space in accordance with East Northamptonshire's Open Space SPD. However, the emerging Part 2 Local Plan provides the most up to date local standards.
- 4.4.7 The submitted Parameters Plan confirms that the 9.83ha of Green Infrastructure will include areas of public open space, including natural and semi-improved greenspace, amenity greenspace and children's play areas, which meet the requirements of the emerging policy in terms of quantum and accessibility.



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- 4.4.8 Policy EN10 requires that the long term management of all new open space must be secured. This can be addressed as part of the Section 106 agreement through discussions with the Council.
- 4.4.9 The proposals do not make specific provision for parks and gardens, or allotments on site, but the overall open space provision is well in excess of the adopted and emerging policy standards. Off-site contributions would be considered as necessary, based on an evidenced need.
- 4.4.10 The Playing Pitch Strategy and Action Plan evaluates the local supply and demand for playing pitches in East Northamptonshire. The southern area requires football (grass), rugby and cricket pitches.
- 4.4.11 In terms of rugby pitches, the development will relate well to the proposed sports pitches at the western site boundary, and facilitates their delivery by safeguarding land for access. The development will ensure a safe and attractive access route to the facility, thereby promoting walking and cycling. Off-site contributions to other sports would be considered as necessary, subject to there being an evidenced need.
- 4.4.12 Policy EN11 of the Part 2 Local Plan (Enhancement and provision of sport and recreation facilities) is not relevant as the application is for fewer than 500 dwellings, and not a strategic site.

#### Historic Environment

- 4.4.13 Core Strategy Policy 2 (Historic Environment) seeks to protect, preserve and, where appropriate, enhance the historic environment. The policy criteria address how development should relate to heritage assets and their settings. Draft policies EN14 and EN15 of the Part 2 Local Plan further address designated and non-designated heritage assets respectively.
- 4.4.14 Heritage assets have been considered in preparing the parameters, which was informed by a Historic Environment Desk Based Assessment (HEBDA). This confirms that there are no designated heritage assets on the site and that the proposed development will not affect any designated heritage assets nearby



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4.4.15 The HEDBA advises that the available archaeological records, combined with the result of the analysis of historical mapping, cropmarks and geophysical survey of the site, suggest that potential for significant archaeological remains of any period within the site is low. Whilst it is possible that buried remains relating to medieval or post-medieval agriculture could survive within the site, any such remains would be considered to be of negligible significance.

4.4.16 There is no evidence to suggest that the site contains, or has the potential to contain, archaeological remains of sufficient importance to prevent development. It has been agreed with the County Archaeologist, as part of pre-application discussions, that in view of the geophysical survey results, any additional works can be secured via planning conditions.

#### 4.5 Accessibility Policies

4.5.1 The traffic and transportation elements of the proposed development are considered in the submitted Transport Assessment.

4.5.2 The traffic generation has been estimated and distributed onto the local network using the Northamptonshire Strategic Model (NSTM). This confirms the development would generate modest vehicular movements during the morning and evening peak. Nearby junctions are forecast to operate within capacity during both the morning and evening peaks.

4.5.3 Overall, the Transport Assessment considers the impacts and appropriateness of the development in line with the wider policy tests set out in the NPPF. The conclusion of that assessment is that the additional traffic would not have a material impact on the safety or operation of the local road network.

4.5.4 Parking will be provided on site in accordance with the relevant parking standards. The parking requirements will be addressed at the detailed design stage and be included in future reserved matters. There will be provision for electric vehicle charging in accordance with Policy T1 of the Neighbourhood Plan.



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4.5.5 A draft Travel Plan has been prepared to encourage the development of sustainable travel patterns. The Travel Plan measures include a welcome pack to new residents together with a programme of monitoring and ongoing dissemination of travel information.

## 4.6 Environmental Management Policies

### Biodiversity and Geodiversity

4.6.1 Core Strategy Policy 4 (Biodiversity and Geodiversity) seeks to achieve a net gain in biodiversity and to protect and enhance features of geological interest. It aims to protect key assets for wildlife and geology, in particular the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site, enhanced ecological networks (with Neighbourhood Plan Policy EN3), and the recovery of priority habitats and species.

4.6.2 Matters relating to biodiversity are addressed in the Environmental Statement. This confirms the site is not subject to any statutory designations but considers the Upper Nene Valley Gravel Pits PSA / Ramsar site / SSSI, which is 3.3km away. The provision of well-designed on site green infrastructure that exceeds the 'Suitable Alternative Natural Greenspace' (SANG) requirements, will mitigate the additional recreational pressure the development might create. No other statutory or non-statutory nature conservation sites would be affected by the proposals.

4.6.3 Protected species surveys identified locally important populations of bats, birds and great crested newts present, which utilise hedgerows, trees and the ditch within the site. These features are largely retained within the site. The new Green Infrastructure will include native species, structural planting, and grassland creation and result in an overall increase in habitat diversity, offering a greater network of opportunities for bats, birds and amphibians to potentially forage and commute.

4.6.4 The development of agricultural land will result in the unavoidable displacement of skylark and yellowhammer from the site. There is suitable alternative habitat for these species to the east, such that displacement is not considered to have a major impact on the local populations.



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4.6.5 The majority of the development footprint will be within the existing arable land, which is of lower ecological value than the hedgerows, trees and ditches at the site boundaries. The proposed development has the capacity to deliver a net biodiversity gain greater than 10%, owing to the extensive areas of green infrastructure, which will expand on the retained features creating additional grassland, wetland and areas of structural woody planting.

#### Flood Risk and Drainage

4.6.6 Core Strategy Policy 5 (Water Environment, Resources and Flood Risk Management) sets out criteria to ensure development contributes towards reducing the risk of flooding and to protecting and improving the quality of the water environment. The site falls within Environment Agency Flood Zone 1 (low risk) and suitable for the proposed residential use. The first requirement to avoid areas of high and medium flood risk is therefore satisfied.

4.6.7 The risk of surface water flooding at the site has been established with reference to the EA flood risk maps (less than 0.1% risk) and hydraulic modelling undertaken for the site, which shows reduced extents of surface water flood risk when compared to the EA maps. A sequential approach has been taken in terms of locating development within the site, reflected in the Parameters Plan. The site is also considered a negligible risk of groundwater flooding, sewer flooding or flooding from artificial sources.

4.6.8 The surface water strategy includes a number of attenuation basins and sustainable urban drainage features to reduce flood risk and manage increased run-off from the proposed development. Surface water will discharge via gravity to the watercourse within the western site boundary adjacent to the A6. The flow will be restricted to the equivalent greenfield run-off rate, up to and including the 1 in 100 year plus a 40% allowance for climate change storm event.

4.6.9 Finished floor levels of the ground floors will be raised above the external surface levels in specific parts of the site, and the site levels will be landscaped to slope potential runoff away from the proposed dwellings and towards the proposed roads. This ensures compliance with the policy.



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### Air Quality

4.6.10 An Air Quality Assessment forms part of the Environmental Statement. Measures set out within the Transport Assessment and Travel Plan will promote a shift to low emission transport, and walking and cycling.

## **4.7 Health Policies**

4.7.1 Policy EN12 (Health and wellbeing) requires that proposals demonstrate that the design will contribute positively to health and wellbeing by enabling and promoting healthy lifestyles and minimising any negative health and wellbeing impacts. The proposals meet the relevant criteria by:

- Providing a framework to create high quality and accessible public realm that promotes and encourages physical activity and social engagement.
- Engagement with the NHS Clinical Commissioning Group regarding healthcare provision and access, as part of pre-application discussions with the Council.
- Carrying out of a Health Impact Assessment in accordance with the Northamptonshire Planning and Health Protocol.

4.7.2 The Design and Access Statement evaluates the proposals against the principles of good design contained in the 'Building for a Healthy Life' publication, for achieving best practice design. This establishes a positive performance in terms of creating integrated neighbourhoods, distinctive places and streets for all.

4.7.3 The Rapid Health Impact Assessment has assessed the effects of the proposals could have on the health and wellbeing of different groups. The assessment has shown the development will have either a positive or a neutral impact on the themes set out in the Northamptonshire Health Impact Matrix.

4.7.4 Positive impacts include the provision of 9.83ha of Green Infrastructure, the design principles incorporated into the scheme, the opportunity to create biodiversity net gain, and inclusion of a new community facility.



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## 4.8 Infrastructure Policies

- 4.8.1 Core Strategy Policy 7 (Community Services and Facilities) states that development should support and enhance community facilities and services. The emerging Part 2 Local Plan policy requires provision of supporting infrastructure, which should include a mix of ancillary retail, business or community uses. The outline planning application responds positively to this requirement, and makes provision for a community / retail / and or health facility.
- 4.8.2 As the end use not yet been determined, officers have agreed that a retail impact assessment is not required as part of the outline planning application. This would be submitted as part of the reserved matters submissions, if the proposals include a retail space that exceeds the 280m<sup>2</sup> threshold, to accord with Policy EN22.



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## 5. MATERIAL CONSIDERATIONS

### 5.1 Introduction

5.1.1 Planning law requires that material considerations be taken into account when deciding planning applications. These can include the policies within the NPPF and supplementary planning documents published by the local planning authority.

### 5.2 National Planning Policy Framework (NPPF)

5.2.1 At the heart of the Framework is a presumption in favour of sustainable development, which for decision-taking means approving development proposals that accord with the development plan without delay.

5.2.2 Although the proposals do not accord with the adopted development plan, the NPPF also promotes a plan led approach to development. The site is a draft allocation in the Part 2 Local Plan and so the proposals are consistent with the emerging strategy for the area.

5.2.3 The proposed development is sustainable development in accordance with the Framework in contributing towards the three dimensions: economic, social and environmental, by reference to the relevant policies set out in the Framework as follows.

#### Plan Making

5.2.4 The Framework states that the planning system should be genuinely plan-led and that plans should provide a positive vision for the future of each area and, inter alia, a framework for addressing housing needs and other economic, social and environmental priorities. The proposed development supports the plan-led approach set out in the Framework, through consistency with the Joint Core Strategy's strategic policies, which identify Rushden as the Growth Town, and the Part 2 Local Plan which seeks to focus development on land east of the A6.



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### Delivering a sufficient supply of homes

5.2.5 The application would deliver a draft housing allocation in the emerging Part 2 Local Plan, which has been identified as the Council's preferred location to deliver the housing requirement for Rushden, as set out in the adopted Core Strategy. The application site has been specifically chosen by the Council as an appropriate and sustainable location to meet the assessed need for housing (including affordable housing) up to 2031. The application will also contribute towards the Council maintaining a five year supply of deliverable housing sites in accordance with the Framework. The Council should therefore give significant weight to the delivery of housing on this site in the determination of the planning application.

### Promoting sustainable transport

5.2.6 The planning application proposes opportunities to promote sustainable transport modes. Safe and suitable access will be provided for all users, with pedestrian/cycle links to existing infrastructure within the Rushden built up area. The impact of the proposed development on the transport network has been assessed and is not significant. The transport assessment does not identify any transport issues that would prevent planning permission from being granted.

### Making effective use of land

5.2.7 The density of development proposed will make efficient use of the land, whilst protecting features of interest within and adjacent to the site and creating a well-designed, attractive and healthy place. The Illustrative Masterplan shows how the quantum of development can be delivered to achieve an efficient use of the site.

### Achieving well-designed places

5.2.8 The Framework states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to planning. Whilst matters relating to scale, layout, appearance and proposed landscaping are reserved, the information submitted shows that the development will function well and add to the overall quality of the area, and sympathetic to the local character including the landscape setting, in accordance with the Framework.



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5.2.9 The development positively addresses the local design guidance site to reflect local aspirations. The Illustrative Masterplan shows extensive areas of high quality public open space as part of a green and blue infrastructure network, which will provide recreational facilities for both existing and new residents of the area, in accordance with the Framework.

#### Meeting the challenge of climate change and flooding

5.2.10 The proposed development is located in Flood Zone 1 (low flood risk). Satisfactory drainage measures can be accommodated to address localised issues and ensure no greater risk of flooding because of the proposed development. The detail of how the development will be designed to address climate change will be addressed as part at the reserved matters stage.

#### Conserving and enhancing the natural environment

5.2.11 The proposals can deliver a net gain in biodiversity and will not affect protected species. The submitted ground conditions report establishes that the risk of ground contamination and ground gas is very low, and that the site is suitable for residential use. It is possible to mitigate against the adverse impacts of noise and air quality associated with the A6 at the western site boundary. The impact of lighting to and from the proposed development will be considered as part of the detailed design and within the reserved matters submissions.

#### Conserving and enhancing the historic environment

5.2.12 There are no statutory or non-statutory designated heritage assets at the site and none are impacted by the proposed development. Historical mapping, cropmarks and a geophysical survey of the site all suggest the potential for significant archaeological remains within the site is low.

#### Conclusion on the Framework

5.2.13 The proposed development is in entirely consistent with the policies of the Framework. This significant material consideration weighs in favour of planning permission being granted.



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### 5.3 Supplementary Planning Documents

5.3.1 The scheme design and assessment in this Planning Statement has had regard where relevant to the various Supplementary Planning Documents adopted by the Council. These will inform reserved matters, but have been referenced where appropriate, and include:

- Upper Nene and Gravel Pits Special Protection Area SPD
- Biodiversity SPD (2016)
- Trees and Landscape SPD
- Open Space SPD (2011)
- Open Space Standards and Playing Pitch Strategy
- North Northamptonshire Sustainable Design SPD (2009)
- Northamptonshire Place and Movement DPD
- Developer Contributions DPD (2006)

5.3.2 The applicant will enter into a Section 106 Agreement to provide or contribute towards measures to mitigate its impact, and physical, social or green infrastructure, provided that the relevant tests are met, in accordance with the Developer Contributions SPD. A draft Heads of Terms is included in Section 6.



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## 6. DRAFT HEADS OF TERMS OF A SECTION 106 AGREEMENT

- 6.1.1 The applicant accepts that they will enter into an agreement(s) with the Council to provide (unless the matter can be dealt with by condition):
- a) up to 30% of the proposed new dwellings as affordable homes;
  - b) safeguarding land and marketing of the proposed community / retail and or health facility within the site;
  - c) any necessary off-site highway works (under Section 278 of the Highways Act);
  - d) contributions to ensure the suitable on-going maintenance of the open space within the development;
  - e) any necessary contributions towards the improvement of recreation facilities off site;
  - f) subject to confirmation of need, any necessary financial contributions towards improvements to schools that serve the area in which the proposal is located; and,
  - g) any other reasonable and directly related requirements as may be shown to be necessary based on detailed evidence of need.
- 6.1.2 This agreement is subject to any obligation being demonstrated to meet the tests as required within Paragraph 57 of the Framework.



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## 7. CONCLUSION

- 7.1.1 The proposal is for up to 450 homes on land to the east of the A6. The site is identified as an allocation in the draft East Northamptonshire Part 2 Local Plan Submission Version, which seeks to deliver the housing requirement in accordance with the North Northamptonshire Joint Core Strategy.
- 7.1.2 In preparing the Part 2 Local Plan, the Council has assessed various options for the sustainable growth of Rushden as the top tier settlement. The draft allocation demonstrates the Council's intention that the application site be developed to meet the identified housing need.
- 7.1.3 The proposals have been developed having regard to the draft allocation, and in anticipation of the Part 2 Local Plan forming part of the development plan. In any event, the Part 2 Local Plan is a material consideration that can be given significant weight in accordance with paragraph 48 of the Framework.
- 7.1.4 The submitted application is consistent with the established planning strategy for the East Northamptonshire area, and demonstrates the specific requirements for the draft allocation can be fulfilled. It is consistent with the adopted and emerging planning policies in all other respects. It is therefore requested that planning permission be granted.



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**APPENDIX A**

**PRE-APPLICATION ADVICE**



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<b>Please ask for</b>	<b>Direct Dial</b>	<b>Our Reference</b>	<b>Your Ref.</b>	<b>Date</b>
Gavin Sylvester Planning Services	01832 742082	NE/21/00843/QRV		8 February 2022

Dear Richard Cooke

### **Pre-application enquiry**

**Proposal: Outline pre app for residential development of approximately 450 homes, and potential for a new community, retail and/or health facility**

**Site Address: Land East Of A6 And Roundabout At Bedford Road Rushden Northamptonshire**

I refer to your enquiry seeking an Officer opinion on the likelihood of a planning application for the proposed development referred to above being supported. Your enquiry was acknowledged as valid on 22 June 2021. We have since corresponded on various matters and a meeting was held on 6 October 2021.

The proposal is for residential development of approximately 450 homes, including potential for a new community, retail and/or health facility, on approx. 22.62ha of agricultural land on the opposite side of the A6 to the Town of Rushden. Access for motorised and non-motorised users would be taken from the existing A6 roundabout junction with Bedford Road, which would be modified to connect the development with Rushden, including a proposed Toucan crossing. Public Footpath UK9 crosses the site in an east-west direction, following the alignment of an ordinary watercourse that flows in a valley through the site and onwards beneath the A6 in a culvert towards the Town. A hedgerow follows the route of the watercourse and the Public Footpath. Rushden Academy Primary School is located on the opposite side of the A6. The John White Golf Course is located to the south and shares a boundary with the proposed development site.

The most recent illustrative masterplan shows five development areas set within a soft landscaped framework connected by a single spine road from the A6 that branches off into a series of cul-de-sacs within each development area. Drainage infrastructure is located within the east-west area of public open space that follows the route of the Public Footpath and watercourse. One of the two LEAPs is located in this area; the other is close to the northern boundary.

Agricultural land to the south is subject to a planning application submitted by the Rushden Town Council for "*Erection of new rugby club house with four playing pitches and provision of new access road taken directly from the existing roundabout, including creation of new pedestrian crossing and 3m wide shared footway and cycleway on adjacent highway (Resubmission of 19/01974/FUL)*". The planning application is currently being considered by the LPA under ref. 20/01174/FUL. The proposed access road to the Town Council's development would run through your proposed housing development. The Town Centre is around 2km to the north.

The information submitted with your enquiry is as follows:

- Covering letter dated 18 May 2021
- Location Plan CSA/4914/105, received 18 May 2021.

- Concept Masterplan Option 2 – drawing number CSA/4814/103 Rev E, received 18 May 2021.
- Desk Based Historic Environment Report, received 18 May 2021.
- Ecological Statement received 18 May 2021.
- Phase 1 Site Appraisal (Geotechnical and Geo-environmental), received 18 May 2021.
- Supporting Landscape Statement, received 18 May 2021.
- Ardent Consulting – Drainage and Flood Risk Statement, received 18 May 2021.
- Transport Appraisal, received 18 May 2021.
- Vision Document, received May 2021.

Additional information:

- Draft Illustrative Masterplan – drawing number CSA/4914/103 Rev I, received 22 September 2021.
- Illustrative Masterplan - CSA/4914/108 Rev A, received 22 September 2021.

#### Planning policy:

The most relevant planning policies are listed as follows:

North Northamptonshire Joint Core Strategy (JCS) (2016):

- Policy 1 - Presumption in Favour of Sustainable Development
- Policy 2 – Historic Environment
- Policy 3 – Landscape Character
- Policy 4 - Biodiversity & Geodiversity
- Policy 5 - Water Environment, Resources & Flood Risk Management
- Policy 7 - Community Services & Facilities
- Policy 8 - North Northamptonshire Place Shaping Principles
- Policy 9 – Sustainable Buildings
- Policy 10 – Provision of Infrastructure
- Policy 11 - The Network of Urban & Rural Areas.
- Policy 12 – Town Centres and Town Centre Uses.
- Policy 15 – Well connected Towns, Villages and Neighbourhoods.
- Policy 28 – Housing Requirement.
- Policy 29 – Distribution of New Homes
- Policy 30 – Housing Mix and Tenure (30% Affordable Housing within Growth Towns).

Rushden Neighbourhood Plan (made 2018):

- H1 – Settlement Boundary
- H2 – Location of new housing development
- H4 – Market housing type and mix
- EN1 – Design in Development
- EN2 – Landscaping in development
- EN5 – Funding public realm improvements
- EN6 – Gateway sites (development proposals on the vicinity of)
- T1 – Development generating a transport impact
- R1 – Town Centre Uses
- CL2 – Provision of new open space and amenity space.
- CL7 – New Community facilities

Emerging East Northamptonshire Part 2 Local Plan - Submission Draft March 2021

- Policy EN1 – Spatial development strategy
- Policy EN2 – Settlement boundary criteria – urban areas
- Policy EN10: Enhancement and provision of open space

- Policy EN11: Enhancement and provision of sport and recreation facilities
- Policy EN12: Health and wellbeing
- Policy EN13 - Design of Buildings/Extensions.
- Policy EN22: Impact test thresholds for retail development.
- Policy EN28: Land east of the A6/ Bedford Road, Rushden (allocation policy)
- Policy EN29: Delivering wheelchair accessible housing
- Policy EN30: Housing mix and tenure to meet local need.
- Policy EN31: Older people's housing provision
- Policy EN32: Self and custom build housing

Note: the Local plan is currently at examination and the Council has published a schedule of its proposed modifications to the Local Plan Part 2 (Documents EXAM 17 and 18). [https://www.east-northamptonshire.gov.uk/info/200193/adopted\\_local\\_plan/65/development\\_plan\\_documents/15](https://www.east-northamptonshire.gov.uk/info/200193/adopted_local_plan/65/development_plan_documents/15)

Please have regard to these as the examination of the Local Plan Part 2 progresses. Further modification may be suggested as the examination progresses and this may affect your proposals.

#### Guidance:

- Developer Contributions SPD (2006)
- Open Space SPD (2011)
- North Northamptonshire Sustainable Design SPD (2009)
- Biodiversity SPD (2016)
- Open Space Standards and Playing Pitch Strategy by KKP Consultants
- Domestic Waste Storage and Collection Supplementary Planning Document (2012).
- Northamptonshire County Council Planning Obligations Framework and Guidance Document (2015) and S106 Technical Update Note (2021)

You are advised to read and understand all relevant policy and guidance listed above.

#### Planning history:

None relevant.

#### Consultation responses:

The planning team undertakes consultation with a limited range of organisations and copies of the responses received have been provided to you separately. Responses were received from the following:

- NNC Environmental Protection (noise, air quality and ground investigation).
- NNC as Local Highways Authority.
- NNC as Lead Local Flood Authority.
- NNC Ecological Advisor.
- NNC Archaeology Advisor.
- NNC Developer Contributions Team.
- Sport England.
- NNC Housing Strategy Team
- NHS/Clinical Commissioning Group

#### Officer Opinion:

This response letter should be read in the context of the development plan for the East Northamptonshire Area and the Submission Version of the Local Plan Part 2 (the most relevant policies of which are listed above) and the Council's Screening Opinion dated 22 June 2021 (ref. NE/21/00586/SCR) and Scoping Opinion dated 15 September 2021 (ref. 21/01071/SCQ).

#### Principle of development:

The proposal is for a residential led development, with supporting facilities and infrastructure including 'potential' community, retail and or health uses. Policy EN28 of the Submission Version of the East Northamptonshire Local Plan Part 2 sets out the main policy requirements for the allocation land, however the Plan should be read as a whole in its proper context. I have not repeated the allocation policy here as its provisions are relatively self-explanatory.

In terms of a potential retail use as encouraged by Policy EN28, please be aware that Policy EN22 sets a Retail Impact Assessment test threshold of >280sqm of floor place for retail development outside the primary shopping area of Rushden.

Under the extant development plan for the area, the proposed development would be contrary to its provisions insofar as it would be located beyond the built up area/settlement boundary for Rushden, and in the Countryside where non-essential residential development will not be permitted.

It is a material consideration that the submission version of the East Northamptonshire Local Plan Part 2, (currently at examination) proposes to allocate the land (Policy EN28) for development. Weight should be accorded to the draft allocation in the emerging Local Plan in accordance with the following paragraphs of the NPPF.

*48. Local planning authorities may give weight to relevant policies in emerging plans according to:*

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)*

*49. However, in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:*

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.*

It is clear from the proposed allocation that the Council wishes to see the land developed to deliver housing in the designated Growth Town of Rushden to meet the identified strategic housing needs for the former the East Northamptonshire area. On this basis, an application for the proposed development would be supported by Officers at the present time to ensure the Plan meets the minimum housing requirements as required within the Plan period up to 2031.

#### Housing mix and tenure:

To determine the appropriate housing mix and tenure, internal space standards (NDSS) and accessibility requirements, the Council will apply Policy 30 of the Joint Core Strategy 2016, Policy H4 of the Rushden Neighbourhood Plan 2018 (which sets specific requirements for new build flatted units) with weight given to Policies EN30 (Housing mix and tenure), EN31 (Older people's housing provision) and EN32 (Self and Custom Build) in the emerging Local Plan Part 2.

The response of the Housing Strategy Team at the Council has previously been shared with you. To ensure that reserved matters achieve a satisfactory housing mix, I would expect to impose a condition requiring the housing mix in each phase to be agreed before the reserved matters for the phase are submitted. Weight should also be given to the emerging Local Plan Part 2 as regards the objective of providing a proportion of large homes within Rushden.

#### Accessibility:

The submitted Transport Appraisal (TA) sets out the proposals for accessibility and connectivity. In engineering terms this shows some reconfiguration of the A6 roundabout to provide an access to the highway and a signalised crossing of the A6, and new footpaths to connect with Bedford Road and provide access to Rushden for non-motorised users (as shown on drawing 22279-02b).

It was not clear if the 'distances to local facilities' shown in table 2 of the TA were walking distances or 'as the crow flies' distances. If these are walking distances, please show the routes on a map to clarify the accuracy of the figures stated.

The TA says opportunities for diverting a bus service into the site will be explored as will discussions with the Council to explore measures to improve safety of the public right of way UK9 where it runs through the site and crosses over the A6 and into the Town. The location of UK9 running through the centre of the proposed development and across the A6 and along the south west boundary of Rushden Primary School, may provide - in upgraded form (such as surfacing and lighting) - a convenient and safe way for non-motorised users to travel to the Primary School and further into Rushden. This would help design-out journeys to school by car. For residents in the northern part of the development, this route would be shorter than travelling through the development site, across the A6 at the Bedford Road roundabout and onto Rushden on Bedford Road.

The submitted Vision Document and other plans show a 'potential' new pedestrian route through to Newton Road utilising fields margins. This could provide a useful leisure route towards the Rushden East SUE, subject to Local Highways Authority approval, including a suitably safe means of crossing Newton Road and means of access into Rushden East. It will need to be designed in detail and meet the Highways Authorities requirements.

The advice of the Local Highways Team has been provided and sent to you separately and this covers Transport Assessment, highways improvements and mitigations, safety audit, public transport, travel plan and rights of way matters. The Local Highways team has no in principle objection to the proposed development of the land.

#### Character and appearance of the area:

The linear route of the A6 contains the built-up area of Rushden and marks the boundary between town and countryside. The location of the development site consists of agricultural fields that form part of the landscape setting to this part of Rushden. The countryside has intrinsic character and beauty which should be recognised in planning decisions and in allocating land for development.

The land falls within a parcel of land identified in the Council's Landscape Character Assessment and Capacity Study (2014) as Parcel 33. In broad terms the land is within a local character area of 'Higham Park Settled Farmland' and is part of an area of countryside adjacent to the A6 that is considered to have a good visual connection with the town. Parcel 33 is assessed in the LCACS as being well contained from the wider landscape beyond Bedford Road, Avenue Road and Newton Road and having existing peripheral urban influences, with a strong visual relationship with the main urban conurbation of Rushden from much of the Parcel. The landscape has been modified by the removal of hedges. The LCACS says these all provide elements that would make the Parcel a suitable location for an extension of Rushden, with a "Medium capacity" to accommodate development.

The LCACS 2014 lists the following guidelines for development and mitigation measures:

1. Retention of existing landscape features and vegetation. The main landscape feature that should be retained is the tall hedgerow and trees that lies within the valley bottom within the centre of the Parcel. Other hedgerow trees are worthy of retention and Parcel boundary hedges would be desirable to retain, where this is not too restrictive on development layout.
2. Important views to be retained. Panoramic views from the more elevated parts of the Parcel over Rushden should be retained. Views across the valley from the A6 are also of localised value to the road and setting of the southern part of Rushden. Consequently, the Parcel or part of the Parcel may be most suited for public open space provision.
3. Retention of existing routes through the Parcel. The public footpath that crosses through the Parcel, following the valley bottom, provides an important existing potential future link for existing and any future residential properties, connecting Avenue Road with Rushden town centre.
4. Ground modelling The valley form of the Parcel, would require a moderate level of ground modelling for any potential location of built development and infrastructure.

5. Additional planting Tree planting would form an important element to integrate future development with adjoining areas, particularly with the interface with any public open space provision. Street trees would also help to break up the massing of built forms where seen on the skyline or valley slopes.
6. Maximum building heights Building height should be similar to existing neighbouring buildings and should avoid tall buildings, due to the visual prominence of the Parcel where seen from the southern part of Rushden and the A6. Consequently, heights should be no more than 2.5 storeys.
7. Development layout. The more visually prominent valley would be more appropriate as public open space with any potential development facing on to the valley from the upper valley slopes. To be successful a sympathetic interface between the built form and open space would be important to create a suitable backdrop, where seen to the west.
8. Building materials The predominant objective should be to create a visual cohesiveness, whilst retaining some visual diversity and local distinctiveness that is currently lacking in this locality. Materials should include red brick and some render, with the potential to include local limestone to create distinctive features.
9. Open space provision and green infrastructure The large sweeping and open landform, with longer distance views from elevated parts, and the visual prominence of the west of the Parcel from the A6, makes this area of land particularly suitable for open space provision, potentially linked with other leisure facilities. The loss of landscape and ecological features within the Parcel, creates the opportunity to enhance provision through new green infrastructure that links with existing features and connects with more rural parts of the landscape beyond the areas of existing ribbon development. Green infrastructure should also be designed to enhance accessible green route and connectivity between urban areas and the countryside.

The proposed development would have an urbanising effect on the countryside as it extends the built up area of Rushden onto undeveloped arable land on the opposite side of the A6. The extent of this visual impact would harm the character and appearance of the locality. Given the allocation of the land for development in Policy EN28 of the Part 2 Local Plan to meet assessed housing need, it is considered that the visual and landscape harm of developing the land is capable of being outweighed by the benefits of developing the land as a suitable location for expanding the most sustainable settlement within the East Northamptonshire Area. This is providing the development broadly follows the guidelines and mitigations identified in the LCACS where relevant to the application land within the LCACS parcel 33, or where justified by specific constraints through a Landscape and Visual Impact Assessment.

#### Layout:

To ensure opportunities for expanding the built up area of Rushden remain available, masterplan should provide for streets and routes to be extended in the future onto adjacent land, which it does not do.

The road layout on the illustrative masterplan takes the form of a spine road running through the development which is joined by over ten or more cul-de-sacs leading to relatively small groups of homes, many served by what look like private drives. Streets should be continuous along the edges of a development and private drives impede pedestrian and cycle movement along the edges of a development. A series of paths are shown along the edges of the development and through the area of open space to connect up the different parts of the development but it is unclear whether these will be built to adoptable standards, including a metalled surfacing with lighting to make them safe. Incorporating some of these paths into continuous highway edge routes would achieve a better standard of connectivity. Policy 15(d) of the Joint Core Strategy 2016 sets the objective of improving local integration by ensuring well-connected street networks, very limited use of the cul-de-sacs (which should be short in length) as part of an overall policy aim of strengthening connectivity within and around settlements. There are proportionally a large number of cul-de-sacs shown on the illustrative masterplan.

Open space standards will be judged against the requirements of the Development Contributions SPD 2006 (refer to sections on Open Space Standards, Outdoor Sport Space and Children’s Playing Space) and the Open Space SPD 2011 (as referenced in Rushden Neighbour Plan policy CL2), setting out the Open Space Principles, Recommended Local Standards and a Guide for the calculation of open space. Weight will be given to Policies EN10 and EN11 of the emerging Local Plan Part 2 which set out the requirements for the enhancement and provision of open space and sport and recreation facilities.

Table 8 of the emerging Local Plan Part 2 lists the minimum amounts of open space required to support new development. Based on an average household size of 2.4 persons per dwelling, I calculate the open space requirements for 450 homes as follows:

Typology	Space per 1000 population (hectares)	Space per person (hectares)	Space requirement for 450 homes (1080 population) in hectares
parks and gardens	1.12	0.00112	1.2096
natural and semi natural	1.38	0.00138	1.4904
amenity greenspace	0.58	0.00058	0.6264
children and younger people	0.04	0.00004	0.0432
allotments	0.38	0.00038	0.4104

This table can be adjusted to account for a specific dwelling mix and I would expect to impose a condition requiring the dwelling mix to be agreed to accord with Policy 30 of the Joint Core Strategy 2016.

Fields in Trust guidance will be a material consideration. The Council will apply these documents and policies when assessing the requirement for open space and sports provision. There may be a requirement to make a contribution to existing off-site sports facilities to increase capacity. In terms of play space, the central LEAP shown on drawing CSA/4914/103 Rev I, appears rather isolated and distant from houses. It should be located closer to the housing so that it is overlooked, lessening the probability of it being vandalised or used for anti-social purposes. The public should feel safe when using the facilities. It would better serve the homes in the southern part of the site if it was relocated.

We would welcome further discussion over the proposed masterplan to ensure that a satisfactory masterplan is submitted with a future application.

Air Quality:

Air quality will need to be assessed and mitigation measures may need to be proposed in accordance with the comments received from the Councils Environmental Health Officer’s comments.

Living conditions of future occupiers:

Layout would be a reserved matter, hence the main amenity impact to consider at this stage would be noise generated by traffic travelling along the A6 on the living conditions of future occupiers of the development. The amenity policies in the development plan and relevant noise policy and guidance in the Planning Practice Guide, should be followed. A noise assessment will be required to demonstrate that the proposed masterplan is capable of providing future occupiers with satisfactory living conditions. The need for windows to be closed to avoid unsatisfactory internal noise levels should be designed out to avoid homes having to rely on alternative ventilation, particularly powered mechanical extract systems.

The proposed new rugby club house with four playing pitches and provision of new access road from existing roundabout, on adjacent land(Resubmission of 19/01974/FUL)”, also presents a source of noise, disturbance and light spillage to the proposed housing development site that should be assessed through a noise assessment.

The proximity of the adjacent Golf Course presents a safety risk to future occupiers of the site. A specialist ‘Ball Strike’ assessment should be undertaken to assess the risks from stray Golf balls

impacting people and property on the development. The risk should be designed out by the masterplan or otherwise reduced to an acceptable level by mitigation measures.

#### Amenity of neighbouring occupiers of land and buildings:

Given the location of the land and distances of separation from other sensitive land uses, the proposed development would not harm unacceptably the amenities of neighbouring occupiers of land and buildings.

#### Bins, Bikes and Cars:

The storage and parking of bins, bikes and cars is a matter for detailed design, however in preparing a detailed masterplan and Design & Access Statement, you should show how the development would be designed to comply with 'Residential Parking Standards' guidance within the Northamptonshire County Council Parking Standards (2016) and Domestic Waste Storage and Collection Supplementary Planning Document (2012), which advises on matters such as bin storage and provides details of refuse vehicles for highway design.

#### Ecology and biodiversity:

The land is not located within the 3-kilometre buffer zone of influence of the Upper Nene Valley Gravel Pits Special Protection Area. However, Natural England was consulted on the request for a screening opinion and replied that the project is likely to have potential significant adverse effects on the Upper Nene Valley Gravel Pits SSSI, SPA and Ramsar designated conservation sites that are important. This will be assessed through the required Environment Statement.

The submitted Ecological Statement of March 2021 is noted but has not been assessed by the Council's Ecological Advisor. That said, if its findings are accepted on face value the habitats present on site can be retained or adequately compensated for through detailed ecological and landscape design, along with the ability to deliver biodiversity net gain.

#### Drainage and flood risk:

A drainage assessment will be required for major development and must demonstrate that flood risk to third party land and property will not be increased in accordance with Policy 5 of the Joint Core Strategy 2016. The site lies within Flood Zone 1 on the Environment Agency Flood Zone Map from rivers and the sea.

#### Energy and emissions

Policy 9 of the JCS will apply and requires that development should incorporate measures to ensure a high standard of resource and energy efficiency and reduction in carbon emissions. The layout in the proposed masterplan should demonstrate how the development will achieve maximised use of passive solar design to address heating and cooling, and the application will need to demonstrate that, where technically feasible, the development is able to access or make provision of decentralised energy networks, or safeguard future opportunities to do so without major disruption.

#### Developer contributions:

The Developer Contributions SPD (2006) is the starting point for determining the development contributions and it uses an average household size of 2.4 for relevant calculations. Policy 10 of the Joint Core Strategy sets the policy requirements.

The Northamptonshire County Council Planning Obligations Framework and Guidance Document (2015) and S106 Technical Update Note (2021), provides guidance on contributions to former County Council run services. The Developer Contributions team has provided advice on the obligations it would seek from this development.

The requirement for a community building will be based on existing provision in the locality and its accessibility to the population on the development site.

The Rushden Neighbourhood Plan, policies EN5 and EN6, will seek where appropriate development contributions to deliver public realm improvements and enhancements, with supporting paragraphs 4.12 and 4.13 identifying the 'gateways' to Rushden – including Bedford Road/A6 Junction – as areas where public realm improvements and enhancements will be sought. You should contact the Town Council to discuss ideas for achieving the policy aims in the Neighbourhood Plan.

Heritage and archaeology:

Please carefully consider the comments of the archaeology officer which are self-explanatory and have been provided separately. I do not consider that development of the land would, aside from archaeology, be likely to harm heritage assets given its location.

Application requirements:

If you decide to make a formal application, our website provides further information about how to apply and what to include in your application. Please refer to the following link: [https://www.east-northamptonshire.gov.uk/info/200170/planning\\_permission/1572/apply\\_for\\_planning\\_permission](https://www.east-northamptonshire.gov.uk/info/200170/planning_permission/1572/apply_for_planning_permission)

We have corresponded over the list of documents necessary to constitute a valid planning application and I have advised that a number of emerging policies set requirements for further studies, for example Health Impact Assessment. For the purposes of determining a planning application we may require information over and above the local list requirements.

Summary:

The proposal does not accord with the policies of the adopted development plan for the area, however the proposed allocation of the land in the emerging Local Plan Part 2 (Submission Version) for the East Northamptonshire area does hold weight, with the Plan currently under examination. It has followed a process of assessing options for sustainable growth of Rushden as the top tier (growth town) settlement within the area, where the relative merits of various sites put forward to grow Rushden and meet housing requirements have been assessed. On this basis and subject to all other material considerations, including those referred to in this letter, Officers support, in principle, the development of the land for housing, as a proposed allocation in the Part 2 Local Plan. This stance will continue to be reviewed as the Local Plan Part 2 examination progresses.

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Informative notes:

Please note that this letter represents your pre-application advice. The Council is not able to enter into detailed discussions regarding this advice, because of the number of queries it receives. The advice, whilst given in good faith, cannot prejudice the decision of the Local Planning Authority in determining any formal application which may be received.

Please note that except where expressly stated, in formulating this pre-application advice the Council has not undertaken any consultations with external bodies or agencies. You are therefore strongly advised to approach any such bodies or agencies yourself to gain as full a picture as possible of any potential issues or constraints that fall outside the remit or expertise of this Council but may arise during the determination of a formal planning application.

If you decide to make a formal application, our website provides further information about how to apply and what to include in your application. Please refer to the following link: [https://www.east-northamptonshire.gov.uk/info/200170/planning\\_permission/1572/apply\\_for\\_planning\\_permission](https://www.east-northamptonshire.gov.uk/info/200170/planning_permission/1572/apply_for_planning_permission).

Under Paragraph 38 of the National Planning Policy Framework, this council operates a process of 'positive planning'. On that basis, it is our commitment to determine formal applications within the statutory time period wherever possible, to provide certainty to our customers. In order to do that, we will not always enter into discussions during the course of applications, therefore you should ensure that all information likely to be required is submitted at the outset. Our Development Management Charter provides further information about how we process planning applications: <https://www.east-northamptonshire.gov.uk/developmentmanagementcharter>

I would stress that this letter does not constitute a Certificate of Lawful Development under either Section 191 or 192 of the Town and Country Planning Act 1990 (as amended). If you wish to obtain a formal determination under this legislation, please refer to our website for further guidance on how to apply. A fee is usually payable for such an application.

You should note that Building Regulations are separate from Planning Regulations and any proposal submitted for planning approval may need a separate Building Regulations approval. Building Control Services can be contacted on 01832 742139, if you have any queries in relation to this matter and you should seek their advice prior to commencing any building works.

Before proceeding with a formal application, you are advised to check your deeds to see if there are any covenants, private rights of way, or other legal restrictions which would preclude the development being carried out.

I hope the above information is useful.

Yours sincerely

A handwritten signature in black ink that reads "Gavin Sylvester". The signature is written in a cursive style with a large initial 'G'.

**Gavin Sylvester**  
**Principal Development Management Officer**