

See NDP-0029

NORTH NORTHAMPTONSHIRE JOINT CORE STRATEGY

Duchy of Lancaster: Response to Emerging Draft Joint Core Strategy

October 2012

1. Introduction – the Duchy generally supports the overall strategy of concentration of new development on main towns. However, we do have concerns over the ‘enhanced role for Rushden’ set out in the Introduction. Whilst we do not object to the objectives of local ambitions, we do believe that it is premature, at this stage, to have identified the location of a Sustainable Urban Extension (SUE) to the east of Rushden. As we have set out below, we are unconvinced that, at this stage, there is a credible evidence base that has properly examined the physical parameters affecting growth east of Rushden and we believe it is more appropriate for the Core Strategy to identify an SUE ‘east of the A6 at Rushden/Higham Ferrers’ at present. The Duchy is firmly in support of growth to the east of the A6 at Higham Ferrers/Rushden.

Change Proposed: the description of the proposed SUE should be changed to ‘..... an SUE to the east of the A6 at Rushden/Higham Ferrers’.

2. Key Diagram – we object to the Key Diagram on two grounds:
 - As set out below we do not support the approach whereby Rushden is classified as a separate settlement to Higham Ferrers and that Rushden alone is designated as a Growth Town. We believe that these two conjoined settlements should be regarded as single urban area for the purposes of planning policy formulation; and
 - The Key Diagram implies that growth is planned for land directly east of Rushden. We are not aware of any detailed technical assessments or planning studies which provide clear evidence to support this at the current time. The precise location for growth is a matter for a much more detailed level of planning by the District Council (e.g. through a Site Allocations DPD) in due course.

Changes Proposed: 1) the boundary of the growth town area around Rushden should be amended to include Higham Ferrers and 2) the arrow to the east of Rushden should be altered to reflect a more general ‘area of search’ east of the A6.

A more detailed assessment will need to be based on a proper masterplanning approach and it is therefore premature, at this stage, to imply that the growth will be east of Rushden. It may or may not be, subject to detailed analysis, and therefore the Key Diagram should be amended to suggest a more general eastwards expansion of Rushden/Higham Ferrers. If the plan and key diagram are approved as currently drafted then there is a risk that the District Council’s available options will be limited in approaching the Site Allocations process and therefore the Core Strategy should provide flexibility given the level of technical assessment that has been undertaken to date.

In the light of the above, the Duchy has undertaken an initial assessment of constraints and opportunities east of the A6 and that assessment is included as part of these representations. The initial assessment has looked at a number of possible development locations and concludes that there are advantages in further assessing a ‘linear’ development alongside the A6 rather than a specific location east of Rushden to achieve the most sustainable and appropriate urban form.

3. Policy 10 – the Duchy objects to Policy 10 ‘Network of Urban and Rural Areas’ and the supporting information in Table 2. The basis of this objection is that the Duchy does not support Rushden being separately identified as a settlement from Higham Ferrers. The two towns form a contiguous built up area and should be regarded as a single settlement in planning policy terms for that reason. There seems little benefit in regarding them as separate settlements in plan-making terms.

In terms of Policy 10 we do support the approach to development in the Growth Towns as set out at 1a. Our concern is the application of the growth towns approach in Policy 10 to just Rushden and not to Higham Ferrers. It seems highly inappropriate, and impractical, for the two towns, which are physically linked, to be given a different status in Table 2 and we feel they should be combined under the Growth Towns hierarchy. The effect of the draft Policy is that Rushden is subject to part 1a of Policy 10 and Higham Ferrers is subject to part 1b of Policy 10. That distinction seems somewhat perverse in practice given the physical geography of the settlements and actually applying it in practice may be problematic. It is worth pointing out that the contiguous nature of Rushden/Higham Ferrers is, geographically, unique in North Northamptonshire and therefore it is quite reasonable for there to be a specific policy approach to this area in the Core Strategy.

While there may be two main centres and separate Town Councils, physically it is a single built up settlement as there is no break in a continuous developed area. Employment, shops, schools, services and recreation facilities will be used by all residents from the whole area. The two towns operate and function as a single entity and that is how they should be treated in planning policy terms even if there are social and cultural reasons for there being slightly different identities.

The identification of Rushden is evidenced in the ‘Rushden Urban Extension’ Draft Background Paper, August 2012. In our opinion, it is apparent from reading this paper (para 4.4 & 4.5) that the identification of Rushden as a growth location appears to have been determined at the Planning Policy Committee of 18/6/12 as there is almost no technical analysis in the evidence base which supports this compared to say, eastward growth of Higham Ferrers or some mixed approach. This is backed up by the assessment set out in Table 1 of the Background Paper which considered all potential options for the growth of Rushden/Higham Ferrers. Key findings in respect of Site HIG2 (Higham Ferrers North East) were:

‘Single landowner (Duchy). Good connection with Higham Ferrers (Kimbolton Road/Wykeham Road/Stanwick Road). The summary/overview of this site is reported as: ‘Good connectivity with Higham Ferrers. Some strategic concerns, however, re further major development at Higham Ferrers, as opposed to Rushden’.

The ‘strategic concerns’ are not detailed and there do not appear to be any technical planning reasons why Higham Ferrers expansion is seen as inferior or less appropriate than Rushden expansion. We therefore do not believe there is a clear planning-led evidence base for growth at Rushden East as opposed to Higham Ferrers.

In the Duchy’s initial appraisal we have taken the District Council’s comparative assessment of growth locations set out in its 2006 Expansion Study and given the green, orange, yellow

and red values (as identified by the Council) a ranking of 1, 2, 3 etc. Although this is a very simple exercise, it results in 'HF11' (i.e. land east of Higham Ferrers) being ranked first. This highlights two key issues:

- i) There has been almost no assessment that has considered physical opportunities and constraints that may influence the appropriate location for growth east of the A6; and
- ii) The physical assessment that has been carried out appears to lack depth and land east of Higham Ferrers has, for example, not been discounted but has not been taken forward for further study.

Whilst the Duchy supports growth east of the A6 there are a number of factors which will need to be fully taken into account in due course:

- Moulton College: a partnership between the Duchy of Lancaster and Moulton College has successfully developed the Chelveston Road campus for further education purposes and business incubator units (fully occupied). The College itself has aspirations to expand and it will be important that any growth east of the A6 is linked to the College, preferably by non-vehicular means;
- In recent years a number of local sports interests have approached the Duchy and expressed interest in occupying further land between Moulton College and the A6 to develop a major new recreation/sports complex – this would seem to be a good location for such uses. Development of the Duchy land could also provide easy access for Higham/Rushden residents to open countryside further to the east including the Chelveston Golf Club;
- Depending on the size of any strategic urban extension east of the A6 there is the potential to utilise three existing A6 junctions at Chelveston Road, John Clark Way and Newton Road roundabouts. Three junctions presents maximum flexibility for the distribution of generated traffic whereas a 'Rushden East' growth area may only have two junctions to work with;
- It is notable that the northern part of the A6 is a dual carriageway i.e. that part of the A6 adjacent to Higham Ferrers that is owned by the Duchy. To the south, east of Rushden, the A6 is single carriageway and therefore it is the northern section that will have more capacity to accommodate growth;
- Growth to the east of Rushden is likely to require highways access via the existing A6 John Clark roundabout. Land on the eastern side of this roundabout is controlled by the Duchy of Lancaster and therefore *delivery* of this growth area needs to be considered in a comprehensive manner;
- Land east of Higham Ferrers comprises a continuous area of over 300ha owned by the Duchy of Lancaster. As this area is in single ownership and benefits from direct access to two A6 junctions it is highly deliverable in facilitating growth;
- The Duchy has interests on the west side of the A6 at and surrounding the existing Ferrers School. Duchy land surrounding the school is earmarked for some 300 dwellings and this land could facilitate essential A6 cross-linkages for new growth areas. Such linkages could take the form of pedestrian/cycleway crossings of the A6 or clear interventions into the A6 corridor itself so as to change its character and reduce the barrier effect it may otherwise have. The Duchy land is also well-located in relation to recent employment development at John Clark Way and it provides the opportunity for a high quality pedestrian/cycleway/bus corridor along the old railway line linking to Rushden town centre;

- Sustainability issues in terms of the actual feasibility of linkages (pedestrian, cycleways and public transport) to Rushden town centre; and
- Finally, we note that the SHLAA assessment (included in the Strategic Sites Background Paper, September 2012) has already considered some Duchy land east of Higham Ferrers. The few negative issues identified apply to **any** land east of the A6 and so equally apply to the eastward growth of Rushden.

Proposed Changes: we suggest that the plan is changed by including reference to a combined settlement 'Rushden/Higham Ferrers' in Table 2 and that this combined area is classified as a Growth Town.

Such an approach will provide maximum flexibility at the subsequent more detailed plan-making stage and will allow the boundaries of any growth area to be appropriately identified through a comprehensive masterplanning exercise. It would be inappropriate to pre-judge such a detailed masterplanning exercise by, for example, determining now that growth can only be east of Rushden. On sustainability grounds we feel that such a masterplanning exercise should take full account of the matters set out above and give due consideration to the opportunity that the Duchy land presents.

Related Comments on the Evidence Base (Background Papers)

We have reviewed the relevant evidence base as mainly presented in the following Background Papers:

- East Northamptonshire Urban Extensions Study: Rushden, Higham Ferrers & Irthlingborough (East Northamptonshire Council, August 2006)
- East Northamptonshire Urban Extensions Study: Rushden Update (NNJPU, June 2012); and
- Rushden Urban Extension: Background Paper (Draft) (NNJPU, August 2012).

Our overall comment on these papers is that whilst there is much discussion about the merits of growth east of Rushden there is almost no evidence which explains why growth east of Higham Ferrers is considered inappropriate or inferior (to Rushden). This aspect appears to have been largely ignored. More particularly:

- The 2006 Study shows very few negative issues associated with any expansion of Higham Ferrers and concludes that 'all directions could accommodate growth in certain areas';
- The June 2012 Update does not refer to Higham Ferrers and only considers the potential growth directions for Rushden; and
- The draft August 2012 Paper shows (in Table 1) that sites HIG1 and HIG2 were not to be discounted. Furthermore, for Site HIG1 the summary view was '**No obvious development constraints. Key development opportunity east of Higham Ferrers.**' For Site HIG2, the summary view was '**Good connectivity with Higham Ferrers. Some strategic concerns, however, re further major development at Higham Ferrers, as opposed to Rushden.**'

We therefore conclude that there is no available evidence which has discounted land east of Higham Ferrers and that 'reasonable alternatives' have not yet been properly or fully considered in this case. Although the assessment tables state that these sites were not discounted – it appears that no further comparative work was undertaken following the June 2012 Planning Policy Committee as the focus of planning assessment was subsequently Rushden. The evidence base is therefore lacking in consideration of reasonable alternatives

although this matter would be addressed by the acceptance of changes sought by these representations.

The initial appraisal that the Duchy has undertaken demonstrates that there may be clear sustainability advantages in considering a wider potential development area rather than limiting it to land east of Rushden. It is for that reason that we firmly believe the Core Strategy Review should identify an 'area of search' east of the A6 and no more, at this stage.

4. Policy 23 – for the same reasons we object to the wording of Policy 23 'Distribution of New Jobs'.
Proposed change: the urban extensions category should include reference to 'Rushden/Higham Ferrers East' rather than just Rushden.
5. Policy 28 – the Duchy of Lancaster supports the overall housing requirements and strategic opportunities particularly in relation to East Northants. The Duchy believes that, subject to changes to Policy 10 described above, the Strategic Opportunity figure of 7,900 dwellings in East Northants is deliverable. Growth at Rushden/Higham Ferrers will be more deliverable if allocated on land in few ownerships and to owners that control key points of access.
6. Policy 29 – for reasons set out above we object to the wording of Policy 29 'Distribution of New Homes'. **Proposed change:** the table within the policy should be amended to include reference to 'Rushden/Higham Ferrers East' (or 'Area of Search') rather than just Rushden for the reasons set out above. The whole area, east of the A6, is relatively unconstrained in planning terms and therefore the Core Strategy should provide flexibility for more detailed assessment to decide where, precisely, this growth should be located. Use of the term 'Rushden East' is not helpful as it does not really provide any clear guidance to location that will be widely understood.

Allied to this we object to the presentation of the figures in Table 5 'Housing Delivery in Named Settlements'. We support the actual figures within Table 5 but consider, for the reasons set out above, that the Table should present combined figures for Rushden/Higham Ferrers. Given that these two towns have physically merged together and are indistinguishable physically then it is impractical and unnecessary in planning terms to disaggregate such housing requirements based on an administrative boundary line. The disaggregation of such figures will inevitably complicate, and possibly constrain, the preparation of a subsequent more detailed plan by the District Council and would not appear to serve any useful planning purpose. We note that, under adopted Core Strategy Policy 10 'Distribution of Housing' (Table 5) – that the housing figures for the Smaller Towns of Rushden, Higham Ferrers & Irthlingborough are presented as a single aggregate figure. We do not see any need, at a Core Strategy level, to change significantly from that approach.

Summary: the Duchy considers that:

- i) Rushden and Higham Ferrers should be considered jointly in planning policy terms and should be designated as a single Growth Town;
- ii) There is a distinct lack of technical evidence underpinning the concept of growth east of Rushden;
- iii) The merits of land east of Higham Ferrers have not been sufficiently considered despite the positive findings of assessments by ENDC/JPU;
- iv) That land, east of Higham Ferrers, does have physical and delivery advantages; and
- v) The emerging draft Core Strategy should be amended to refer to growth 'east of Rushden/Higham Ferrers' and an appropriate area of search defined.