

# Consideration of Main Issues raised by representations on the Plan for the Borough of Wellingborough Publication Version

December 2017

## 1. Introduction

- 1.1 The Plan for the Borough of Wellingborough Publication Plan was published for consultation between 20 September and 3 November 2017. A total of 146 comments were received from 38 respondents. The plan forms part 2 of the local plan with the North Northamptonshire Joint Core Strategy (JCS), which was adopted in July 2016, forming part 1. The North Northamptonshire Joint Committee considered the plan at its meeting on 7 November 2017 and confirmed that it is in conformity with the JCS. The Joint Planning and Delivery Unit (JPDU) considered that the plan *'identifies the relevant issues where local guidance is required. It clearly recognises the existing policy framework within the JCS and the importance of not duplicating this to provide a robust locally distinctive policy framework that is in conformity with the JCS.'*
- 1.2 The summary and discussion of main issues raised by representations set out below is necessarily broad-brush. Further detail on issues raised can be found in the response to individual representations, which are in the schedule of representations to the Publication Plan for the Borough of Wellingborough (PBW) which should be read alongside this document. A number of representations identify the same issues as those made to the Emerging Draft Plan.
- 1.3 The individual representations are all available to view on line through our consultation portal together with any attachments such as plans and accompanying reports.
- <http://wellingborough-consult.limehouse.co.uk/portal/wellingboroughplan/publicationplan>
- 1.4 Some respondents are referred to by name in the summary and discussion set out below. This is to give context to the identified issues and does not imply that the representations are more important than others. The *'BCW response'* does not seek to address individual representations, but to provide a broad response to key issues. Where necessary the council will respond to individual representations through the examination process.

## 2. Issues relating to Duty to Cooperate

### a). *Does the plan satisfy the Duty to Cooperate in relation to planning for the longer term growth of Northampton?*

- 2.1 South Northamptonshire Council is mindful to raise an objection, with regards to the noticeable silence within the plan on the issue of the Northampton Related Development Area (identified in the West Northamptonshire Joint Core Strategy Local Plan) and the existing shortfall in the 5 year supply of housing land in that area. It notes that within the PBW (paragraph 1.0.24) the overall shortfall in provision of Northampton's housing by the end of the plan

period will be considered as part of the North Northants Joint Core Strategy (JCS) review, which it welcomes.

- 2.2 However South Northamptonshire Council considers that it is important to include a policy approach in the plan that helps to deal with the current existing 5 year supply shortfall in the NRDA. Without a robust approach, South Northamptonshire Council is concerned that there is a risk that speculative applications will come forward in its towns and villages, which may be difficult to resist in the absence of either a 5 year land supply or a policy position to protect respective Districts.
- 2.3 Daventry District Council welcomes the willingness of the Borough Council of Wellingborough to co-operate to address the need to accommodate some of Northampton Borough's needs post 2029, as indicated in paragraph 1.0.24. On this basis the District Council welcomes continued dialogue and co-operation on this matter to inform appropriate local plans including a future review of the WNJCS when this takes place.

*BCW response:*

- 2.4 *The support of Daventry District Council to the approach to considering the longer term growth of Northampton as set out in the JCS and paragraph 1.0.24 of the PBW is welcomed, as is acknowledgement of this approach by South Northamptonshire Council. This recognises the extensive work that has been undertaken with the relevant councils through the preparation of the JCS and PBW.*
- 2.5 *It should be noted that the Inspector's Report for the North Northamptonshire JCS concluded at paragraph 8 that the duty to co-operate has been met and 'any future requests that may come from neighbours for help in regard to their objectively assessed needs would be a matter for a plan review to consider at the appropriate stage(s)'.*
- 2.6 *In relation to South Northamptonshire Council's objection regarding the existing shortfall in the 5 year supply in the Northampton Related Development Area and the need to deal with this in the short term, the council will continue cooperation on this matter but believe that in light of the above, should this be an issue for Part 2 plans then this should, in the first instance, be addressed by the Part 2 Plans in West Northamptonshire. It is considered notable that objections on this matter have not been received from Northampton Borough Council or the West Northants Joint Planning Unit and that Daventry District has welcomed the willingness of the borough council to cooperate on addressing the needs post 2029.*

### **3. Other issues relating to Legal Compliance**

- 3.1 No significant issues have been raised in relation to compliance with the Local Development Scheme, Statement of Community Involvement, or Development Plan Regulations. However, issues have been raised in relation to the adequacy of the Sustainability Appraisal. These issues are discussed below.

**b) Does the Sustainability Appraisal (SA) adequately consider reasonable alternatives?**

- 3.2 Some respondents from the development industry are critical of the testing of alternative levels of development in the rural area in the SA. This is largely linked to representations challenging the delivery rates at the Sustainable Urban Extensions (SUEs) and that as a consequence more growth should be distributed to the rural areas.
- 3.3 Gladman Developments considers that the sustainability appraisal that accompanies the Part 2 Local Plan fails to identify or assess any reasonable alternatives for housing growth or distribution in rural areas and as such cannot be considered to be a robust assessment of the options that are available to ensure that development needs are met in full and a rolling 5 year housing land supply is maintained. Barwood Strategic Land II LLP state that Policy 29 of the Core Strategy allows for higher growth in Irchester to be tested through part 2 Local Plans or Neighbourhood Plans and such testing should take place now, as one of the 'reasonable alternatives' required to be part of the Sustainability Appraisal of the Plan.
- 3.4 Lone Star considers that the Sustainability Appraisal (SA) (June 2017) has failed to provide adequate justification for the approach adopted for residential development within the rural areas of the borough. They state that the SA makes no specific reference to the settlement of Isham, despite other villages being considered at paragraphs 9.2.17-9.2.23 of the SA.

*BCW response:*

- 3.5 *Housing growth and distribution in the rural area is considered in Chapter 9 of the Sustainability Appraisal. The consideration of reasonable alternatives is explained in section 9.2. As explained at paragraph 9.2.4 of the SA "Testing of higher levels of growth has already been undertaken at a broad level in the SA of the Joint Core Strategy through the assessment of a 'dispersed' option. It is not considered necessary to undertake such an appraisal again at local level."*
- 3.6 *Some specific points raised are addressed below:*

*Rural housing would not be met by windfall development*

- 3.7 *It is claimed that the rural housing target of 540 will not be met by relying on windfall development. As explained at section 9.2.10 of the SA Report, the rural housing target is likely to be exceeded due to a combination of anticipated windfall development (384 homes), committed development and completions (192 commitments in the rural area excluding Finedon plus 149 completions 2011-2017) and the delivery of higher levels of growth in Wellingborough and other named settlements (which have links to some rural areas and could help to address needs). The residual amount of housing to meet the 540 target is only 275 dwellings. It is anticipated that windfall alone could meet this target when considered alongside allocations and neighbourhood plan targets.*

### Higher levels of growth in Isham should be tested

- 3.8 *It is claimed that higher levels of growth in Isham should have been tested in the SA Report. Further growth in the rural areas as a whole was considered unnecessary – this applies to each of the villages. The SA Report did not consider the distribution of growth between individual villages in the rural area, as this was considered unnecessary. There was no evidence to support higher or lower rates of growth in specific settlements (including Isham).*
- 3.9 *The SA report runs through past windfall development at a range of villages to demonstrate that the rural housing target would be likely to be met through a combination of committed development and a reliance on a broad continuation of past rates of windfall development (including exception sites). Only the unnamed settlements where proposed site options were discarded were discussed in this section of the SA report (which did not include Isham).*

### The full range of alternatives for rural housing growth have not been considered

- 3.10 *It is claimed that reasonable alternatives to rural housing growth have not been considered in full. Section 9 clearly explains that the Council has explored a wide range of alternatives relating to rural housing growth. The Council determined that some alternatives were not reasonable and provided outline reasons for this justification (as required by the regulations). The selection of alternatives is a matter for the Council to determine, with input from key evidence and stakeholders. Whilst some consultees think that higher levels of rural growth should be tested, it is considered that this has already been done broadly in the JCS Core Strategy SA process. A more nuanced local assessment is therefore not considered necessary. Furthermore, the Plan approach is already likely to exceed the housing target in the rural area, and provides flexibility for some further growth in these areas if supported by evidence. The reasons set out as to why alternatives are unreasonable are clear and justified. There is no compelling evidence that the alternatives that were discarded should have been tested in the SA.*

### The SA does not demonstrate the Local Plan proposals to be the most appropriate

- 3.11 *It is claimed that the SA does not demonstrate why the proposals in the Local Plan are the most appropriate. It is not the role of an SA to find the preferred approach the most favourable / most appropriate. The SA is an independent piece of evidence which sets out the sustainability implications of the Local Plan and any reasonable alternatives. The SA feeds in to the decision making process, but is not the only factor that the Council will consider when deciding upon a preferred approach. The SA must only provide 'outline reasons' as to why the preferred approach has been chosen. These reasons are clearly set out in the SA Report in section 9.4 (summarising the points discussed throughout section 9).*

### Higher levels of growth in Irchester should be tested

- 3.12 *It is claimed that higher levels of growth in Irchester should have been tested in the SA. Section 8.3.4 of the SA provides outline reasons as to why further*

*growth in Irchester as opposed to Wellingborough is considered to be an unreasonable alternative.*

## **Main Issues relating to Soundness**

- 4.1 Most of the issues raised in representations relate to the tests of soundness set out in the NPPF. This requires a plan to be:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
  - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
  - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 4.2 The main issues arising from representations in respect of these tests are considered below. These relate to the main issues where the soundness of the plan is being challenged. Responses to other representations are set out in the Schedule of Representations to the Publication Plan. The main issues are set out in plan order for ease of reference.

## **Spatial Strategy**

### **Village Boundaries**

#### **c) *Is the approach to assessing and identifying Village Boundaries appropriate?***

- 4.3 Gladman Developments objects to Policy SS1 as they consider it does not reflect the guidance contained in the NPPF. They consider that boundaries are intended to define the extent of a settlement's built up area and such an approach can often become a blunt tool that does not reflect the NPPF's intention for sustainable development to go ahead without delay. Hampton Brook raises similar objections to the overarching approach to village boundaries. They set out that Policy 11 of the JCS does not require Part 2 Local Plans to strictly define settlement boundaries. This is therefore a policy choice made by BCW that is more restrictive than the JCS. John Shenfield considers that the concept of the red line around villages is an unnecessary, out of date planning concept.
- 4.4 Representations from Nene Milling (Bozeat), John Shenfield (Sywell), Mr and Mrs Moore (Grendon), Executors of J Bowers Deceased (Grendon) and Hampton Brook (Great Doddington) seek amendments to the relevant village boundaries to incorporate their area of interest.

*BCW response:*

- 4.5 *As set out in Policy SS1 the purpose of the village boundaries is to interpret whether sites are within or adjoining villages for the purposes of Policies 11 and 13 of the Joint Core Strategy. This is considered to provide helpful certainty and clarity for the development management process.*
- 4.6 *Whilst Policy 11 of the JCS does not specifically require the identification of boundaries, paragraph 5.18 of that plan states:*
- ‘In order to clarify the application of the criteria 2b and 2c of Policy 11, Part 2 Local Plans and/or Neighbourhood Plans may define village boundaries or more detailed village boundary criteria, taking account of the character of the villages. Village boundaries can provide a tool to plan positively for growth and to prevent ad-hoc encroachment into open countryside, particularly for villages located close to larger settlements where coalescence is a concern...’*
- 4.7 *Village boundaries do not unreasonably restrict development, as JCS Policy 13 permits development to meet identified needs adjoining these boundaries. The council has a proactive approach to identifying local need through the production of housing needs surveys and works with Parish Councils and delivery partners to identify suitable sites. In addition, a new Policy (H6) is proposed to enable single self-build exception sites.*
- 4.8 *The criteria for identifying village boundaries and justification for individual boundaries are provided in the [Village Boundary Background Paper](#). Responses to specific requests for amendments to village boundaries are set out in the Schedule of Representations to the Publication Plan.*

## **Green Infrastructure Framework**

### **Local Open Space**

**d) *Is the approach to assessing and identifying sites for Local Open Space (LOS) appropriate?***

- 4.9 *A number of respondents challenge the methodology for assessing Local Open Space (LOS) and consequently the rationale for identifying their site/interests as LOS, which they object to. Bovis Homes and Stanton Cross Landowners Group consider the designation of large areas of the Nene Valley as LOS under Policy GI 2 is both inappropriate and unnecessary. Hampton Brook considers that Policy GI 2 should not be found sound, as drafted. Whilst it is realised that this policy is deliberately broad in nature, it does extend too far into Policy Site 3, potentially undermining the housing allocation.*

### *BCW Response*

- 4.10 *The National Planning Policy Framework (NPPF) recognises the important contribution of public open space. Paragraph 73 states that; ‘Access to high quality open spaces and opportunity for sports and recreation can make an important contribution to the health and wellbeing of communities. Planning policies should be based on robust and up-to-date assessments of needs for open space, sports and recreation facilities and opportunities for new*

provision.’ Paragraph 74 goes on to say that open space, sports and recreation facilities should not be built on, and therefore should be retained wherever possible, other than in specific circumstances.

- 4.11 The council commissioned an [Open Space, Sport and Recreation Assessment](#) in 2015 which was then further updated by an [Open Space Assessment Update and Strategy](#) in 2017. These provided a robust audit of all types of open space within the borough and recommended that policies be introduced to protect these assets now and in the future. This audit formed the basis for identification of Local Open Space.
- 4.12 Paragraph 4.1 of the Open Space Designations background paper says ‘Local Open Space includes all types of open areas of public value, including not just land, but also areas of water such as rivers, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity or provide important wildlife habitats. However, only sites which have some form of public access (including restricted or permissive) are considered appropriate to be designated as Local Open Space. These are the sites which provide an important function to residents and visitors to the borough, whether it is to grow food, play sport or walk the dog. This approach is considered consistent with national policy and is based on proportionate evidence.
- 4.13 Responses to individual sites are considered in the Schedule of Representations to the Publication Plan.

### **Local Green Space:**

**e) *Is the approach to assessing and identifying sites for Local Green Space (Policy GI 3) appropriate?***

- 4.14 A number of respondents, principally from the development industry challenge the methodology for assessing LGS and consequently the rationale for identifying their site/interests as LGS, which they object to. Gladman Developments question whether suitable justification has been put forward for the proposed areas of LGS as defined on the policies maps and in the accompanying background papers.
- 4.15 Hampton Brook state that by allocating a vast number of sites within Wellingborough as LGS, this clearly devalues the importance of the designation and is quite plainly contrary to the intentions of national policy. They consider that it also raises serious question marks over the soundness of the assessment against these criteria undertaken in the Open Space Designations Background Paper. Hampton Brook believe this paper, in conjunction with Policy GI3 represents a blatant attempt on the council’s part to unduly restrict future development in sustainable locations.
- 4.16 Bovis Homes Ltd and the Stanton Cross Landowners Group object to the proposed designation of specific LGS sites which are part of the committed Stanton Cross Scheme. They consider designation of these sites would directly conflict with NPPG paragraph 8 and only serve to confuse the policy context as they form part of the committed development subject to Policy Site 1, yet Policy GI 3 presumes that they will be protected as open spaces.

## BCW Response

- 4.17 *The approach to designating LGS is set out in the [Open Space Designation Background Paper](#). It clearly sets out how the criteria set out in paragraph 77 of the NPPF have been used to assess whether sites should be designated as LGS. For each site an assessment matrix has been completed which clearly shows how each site meets the NPPF Criteria. Evidence has been sought from the Historic Environment Record and other sources of data and has been assessed by planning officers, landscape officers and conservation officers using both desk based assessments and site visits. This methodology is considered to be robust and entirely consistent with national policy. The sites considered have been based on an audit of all open space in the borough and sites put forward through the engagement stage of the plan.*
- 4.18 *The town of Wellingborough has a well-established open space network, based on the valleys and ridgelines which is considered to be structurally important to the character and form of the town. This is recognised in the [Urban Structures Study](#). The scale of open space proposed as LGS needs to be considered in the context of the scale of the settlement. The relatively large areas of linear open space within the town therefore are still local in character. These multifunctional green spaces form the basis of the Green Infrastructure network identified in the town and hold a particular local significance to the surrounding communities. They also provide important connections in terms of footpath and cycle routes to services and facilities for people and provide wildlife corridors for flora and fauna. They are therefore important to the overall sustainability of the town. The network in its entirety is therefore considered to meet the criteria set out in paragraph 77 of the NPPF. Notwithstanding this, each section is considered and assessed against the LGS assessment methodology criteria individually.*
- 4.19 *A recent appeal for 102 homes on a site (site LGS 55) which is part of the town wide open space network which is designated as LGS was dismissed (Appeal Ref APP/H2835/W/16/3144277 planning application Ref WP/15/00127/OUT). In her report at paragraph 11 the Inspector says:*
- ‘Wellingborough has a well-established open space network. I agree with the Council that the open space network in Wellingborough is a particularly good example which is well integrated within the settlement and provides a well-connected network of open space. It provides good connectivity between the town and countryside beyond and is significant in terms of its continuity. It is a considerable feature of the town and a key characteristic.’*
- The inspector went on to conclude that the policy relating to designation of the site conformed to paragraphs 76-77 of the NPPF for designation as LGS.*
- 4.20 *Policy GI 3 is also considered to be consistent with national policy in that it seeks to prevent development that would conflict with the purpose of the designation. The purpose of designation for each site is clearly set out in the assessment matrix.*
- 4.21 *Responses to individual sites are considered in the Schedule of Representations to the Publication Plan.*

**f) *Is the approach to assessing the need for sport and recreation facilities appropriate and does the plan contain clear delivery mechanisms?***

- 4.22 Sport England do not support Table 5.1 setting out standards for indoor sports facilities, raising concerns about how these facilities will be delivered through the relevant policies. They also note the preparation of a Playing Pitch Strategy, but raise concerns about how new sports pitches will be delivered, and how they will be protected once identified in the playing pitch strategy as important to retain.
- 4.23 Bovis Homes Ltd & Stanton Cross Land Owners Group support the overall objective of Policy GI 4 but have concerns that the plan is seeking to remedy existing deficiencies and does not provide sufficient clarity regarding future provision. They set out that the scale and nature of public open space required as part of a new development is a fundamental consideration in the planning of strategic sites. The specific site requirements, notably of sports provision, often dictate the layout of proposed developments and are a critical determinant of the capacity and, therefore, viability of schemes. The Publication Plan must, therefore, clearly set out the expectations in this regard and, in respect of off-site provision, the mechanism(s) for securing the required contributions. They consider that Policies GI 4 and 5 fail to do this as there is a lack of clarity in terms of what is required of new developments and how it will be delivered. Notably there is no indication of the scale and nature of sports provision required, yet reference is made to a future Playing Pitch Strategy to be undertaken in due course.
- 4.24 Hallam Land Management Limited (HLM) support the principle of the policy (GI 4), but object to the lack of flexibility in the policy to allow for circumstances where it may not be appropriate or reasonable to accommodate the levels or types of open space provision based on Table 5.1 within the development. HLM request that the policy be amended to make reference to the SPD providing guidance as to how the policy will be flexibly applied in determining planning applications.

*BCW response:*

- 4.25 *Following comments made on the Emerging Draft plan, the council has sought to work constructively with Sport England, and they have recognised that the council is committed to achieving a robust evidence base and to securing appropriate investment. The methodology for conducting an indoor sports facilities assessment was agreed with the body and this has now been completed. Similarly a Playing Pitch Strategy has now been commissioned and is underway which is being prepared in accordance with Sport England Guidance and Sport England is represented on the Steering Group.*
- 4.26 *[The Indoor Sports Facilities](#) report recommended that the quantity standards for both sports halls and swimming pools should be retained. It also identified a number of options for delivering identified future facility needs (Table 5.2 of the report) and recommended that these options be further investigated through specific feasibility studies.*

- 4.27 *Policy GI 5, together with Policy 7 and Policy 10 of the JCS provide the framework for delivering these indoor facilities once detailed feasibility studies have been undertaken. This approach will remain relevant over the lifetime of the plan, even if the needs change over time as particular sports become more or less popular. These policies enable the council to react to the most up-to-date evidence available.*
- 4.28 *All formal sports pitches are protected as LOS (Policy GI 2). The playing pitch strategy will include an action plan to ensure any future changes in need for playing pitches in the borough are effectively responded to and that existing facilities are sufficiently protected and enhanced. Policy GI 5 also provides the framework for delivering sports pitches if additional need is identified. New playing pitch provision has already been agreed within the two SUEs.*
- 4.29 *Policy 1 and Policy 10 of the JCS ensure that developments will not be made unviable by contributions to infrastructure.*
- 4.30 *The Infrastructure Delivery Plan identifies the need for various sport and recreation facilities as a result of development in the plan, but also recognises that a combination of funding sources will be required and that all of the infrastructure cannot be funded through development alone. This is particularly important as the Playing Pitch Strategy may identify deficiencies which are not related to growth, but are as a result of existing inadequacies, or changes in popularities of individual sports – it is not appropriate for these to be funded through the development process. The action plan should therefore be separate from the development plan.*
- 4.31 *The proposed standards do not seek to remedy existing deficiencies; they are based on an audit of existing provision and feedback from the consultation together with projected population growth. Policy GI 4 is only seeking to ensure that development meets the needs for open space generated by the increase in population from that development. Much of the detail about the audits, assessments, anticipated costs and the approach to mitigating the impact of development is contained within the various evidence base documents. It is anticipated that once the Playing Pitch Strategy is complete a Supplementary Planning Document will be produced to provide further guidance on open space and sports provision and to pull out the main findings from these reports. Appendix E for example of the [Open Space Assessment & Strategy 2017](#) sets out a flow chart which will form the basis of this future Supplementary Planning Document. This shows a flexible approach and does recognise that open space can be of multiple typologies. It also takes account of the location of the site and accessibility to existing open space. The council would support reference to the proposed SPD being included within the plan.*
- 4.32 *The concerns of Bovis regarding the potential impact on the SUEs are noted, however, it is important to recognise that the masterplans for both SUEs have already been agreed and have consent. These policies will therefore have little impact on these areas. The [Open Space, Sport and Recreation Assessment](#) 2015 undertook an analysis of the impact of future provision in the SUEs based on the approved masterplans in Appendix K. In addition, the Open Space Assessment and Strategy 2017 also takes proposed provision in*

*the SUEs into account in identifying appropriate actions for the remainder of the borough.*

- 4.33 *It is considered that there is an appropriate approach within the plan to assessing the need for sports and recreation needs based on a proportionate evidence base. The policies set out a clear framework for delivering future provision and detail, inappropriate to a local plan, can be provided within an SPD.*

### **Delivering Economic Prosperity**

#### **g) *Is the employment strategy in the PBW appropriate?***

- 4.34 *Wellingborough Town Centre Partnership and Wellingborough Chamber of Commerce consider that there is a great shortage of small to medium sized modern premises or sites for small to medium sized businesses which are immediately available and are the lifeblood of the local economy.*
- 4.35 *They set out that of the 127ha of employment land that is said to be committed 113.38ha (90%) is either being developed out currently as large B8 or is locked within the SUEs and may not be released for a considerable time. While both respondents support the allocation of employment land within the SUEs so that people will have the opportunity to live close to where they work this does not provide an immediate solution to a pressing problem – which is that Wellingborough cannot accommodate businesses if they were to be attracted to relocate here in the short to medium term.*

#### **BCW Response**

- 4.36 *The existing established industrial estates together with existing employment sites elsewhere across the borough provide the bulk of stock for small to medium size businesses and are likely to continue to do so. Policies E1, E 2 and E3 set out a flexible approach for site improvements and changes of use and will ensure that there are a sufficient range of sites available for smaller and local businesses. The [Employment Land Supply Update](#) clearly shows a significant amount of commitments and the [Employment Land Review \(ELR\)](#) demonstrates that these together with the existing sites provide a portfolio of sites to meet the borough's needs.*
- 4.37 *Recent business rates data shows that the number of businesses within the borough continues to grow, suggesting a healthy local economy. At the end of the financial year (31 March 2017) there were a record 2,637 businesses operating – up 1.35% over the previous year. From April to September 2017 there was a 1.6% increase to another record high of 2,679 businesses.*
- 4.38 *The JCS Inspector considered the deliverability of the employment strategy in the JCS extensively, concluding at paragraphs 83-84 of his report that:*
- 'All together the JPU's evidence clearly and robustly identifies that, given the acknowledged current over supply of B use class employment land across the plan area, additional sites further to those allocated in the Plan are simply not required at present, albeit those of a non-strategic scale may also be considered in the Part 2 LPs and/or Neighbourhood Plans in due course.*

Moreover, each of the allocated sites has at least reasonable prospects of delivery, with developers actively involved in most instances, over the plan period, and are also considered to be essentially viable currently. None are in unsatisfactory and/or unsustainable locations such that they should not be progressed and alternatives sought instead.

Additionally, the range of size, type and location of sites available across the area is sufficient to provide reasonable choice for prospective occupiers, in all B class uses. In such circumstances, further alternative or additional strategic employment land allocations are not presently required to meet local needs. This includes at Prospect Park at Wellingborough (see also Matter 12).'

- 4.39 Policy 22 c) of the JCS seeks to safeguard existing and committed employment sites for employment use unless it can be demonstrated by an applicant that there is no reasonable prospect of the site being used for that purpose and that an alternative use would not be detrimental to the mix of uses within a Sustainable Urban Extension; and/or resolve existing conflicts between land uses.
- 4.40 SEMLEP has recently identified £1.26M for funding to improve the Leyland industrial estate from the Local Growth Fund. A planning application (WP/17/00343) to demolish an existing block of units and replace it with 13 units in 3 blocks has recently been approved. This will provide a net gain of 3,356 square metres of gross internal floorspace in addition to existing commitments. These units are likely to be available in the short to medium term for small to medium sized businesses.
- 4.41 Whilst it is recognised that Appleby Lodge will predominately provide large scale B8 sites, the scheme also includes provision for smaller units as illustrated on the scheme indicative options plans: <http://prologiswellingborough.co.uk/site-plan/>. The SUEs are anticipated to provide a greater range of site size option. In particular Wellingborough East around the railway station (Station Island) will provide opportunities for a variety of B uses, there are also options north and south of Finedon Road and around the existing Leyland estate. St Modwen Properties PLC are promoting the commercial elements of Wellingborough East, the current focus is on land north of Finedon Road and they intend to submit a Reserved Matters application for a scheme of B1/B2/B8 with a range of unit sizes in mid 2018. In the case of Wellingborough North, the agreed master plan and accompanying design and access statement envisages a business village with a series of buildings which would not be suitable for large scale B8. This is currently proposed to be within Phase 2 of the development, but there is the potential for delivering this earlier if there were sufficient demand. This element of the scheme is in the Borough Council's ownership. Furthermore, there are a range of sites of different sizes that could be brought forward within the town centre and the plan provides a positive framework to facilitate these coming forward e.g. Policy TC 7: Town Centre Opportunity Sites.
- 4.42 It is clear that there are a range of sites of different sizes across the borough to deliver employment growth. There is a robust employment strategy based

on safeguarding and enhancing existing sites and delivering new ones to support the local economy.

### **Delivering Homes**

**h). Will the identified SUEs deliver the required amount of housing to ensure that the plan delivers the full objectively assessed need for housing and can demonstrate a deliverable 5 year supply?**

4.43 A number of respondents from the development industry (notably Hampton Brook, Barwood Strategic Land II, Oxford Uni Endowment Management) alongside Wellingborough Town Centre Partnership and Wellingborough Chamber of Trade challenge the delivery rates at the SUEs. Oxford Uni Endowment Management considers that the decision not to incorporate a lapse rate for sites over 10 dwellings that have planning permission is unjustified. Hampton Brook state that as demonstrated in the report on the delivery of SUE' s prepared by SPRU as part of their representation, it is clear that the council proposes a heavy reliance on the delivery of two large SUEs, which their current research demonstrates, are stalling and prone to delay and subsequent under delivery. Hampton Brook consider that the council's unrealistic assumptions regarding delivery rates may lead to the plan failing to meet its housing requirement by between 979 and 1,644 dwellings. They set out that the incorporation of realistic level of completions from the SUEs also suggest that as currently drafted the plan will not be able to demonstrate a five year land supply.

4.44 Solutions proposed in representations relate to more growth being distributed to the rural area and additional urban housing sites being identified. The arguments made are principally the same as those made to the JCS Examination.

*BCW response:*

4.45 *The JCS Inspector considered that there is a reasonable prospect of delivery on the SUEs (paragraph 127). Notwithstanding this a monitoring trigger has been included for the SUEs to ensure appropriate reviews take place.*

4.46 *The justification for the delivery rates are set out in the Housing Land Supply background paper, particularly paragraphs 2.14 – 2.15 and Appendix 4.*

4.47 *It is accepted that there is a significant reliance on the SUEs, but this is the strategy that has been agreed through the JCS and represents the most sustainable option for delivering growth. Forecasting delivery rates is notoriously difficult, as it does depend on many variables, but the rates produced are based on evidence from site promoters as well as evidence presented at recent appeals and from industry reports. They take a more cautious approach to previous rates, but are still aspirational in seeking to deliver a step change in housing growth to respond to national housing shortages.*

4.48 *It is recognised that past predicted delivery rates have not been achieved, but the reasons for those delays have been addressed. Funding has been secured through the North Northamptonshire Joint Planning and Delivery Unit*

*(JPDU) to support delivery of all the SUEs across North Northamptonshire and funding has been secured to unlock infrastructure requirements. The infrastructure for Wellingborough East is now being built. The S106 agreement for Wellingborough North has been agreed in principle.*

- 4.49 The government has supported the strategic approach to housing delivery within North Northamptonshire by providing significant funding to support capacity and delivery in the area recognising the strategic significance of the North Northamptonshire Garden Community. The JPDU works in partnership with the four local authorities, seeking opportunities through the Department of Local Government, the Housing and Communities Agency and SEMLEP to attract the funds required to promote and deliver the largest growth area outside of London. £1.2 million has been provided through the Communities Capacity Fund since 2015/16 and £1.1 million through the Large Sites Capacity Fund since 2016/17. In addition SEMLEP has provided £9 million funding for the new road bridge over the Midland Mainline railway (known as Route 4) to unlock Wellingborough East for housing and business development. A further £25 million has been secured for the Isham bypass from SEMLEP and the DfT to allow full build out of Wellingborough North SUE (currently the plan only includes 1500 dwellings from this site – it has consent for 3000).*
- 4.50 As referenced above, significant funding has already been secured for the Isham bypass, but a funding gap remains. A bid has been made to the Housing Infrastructure Fund (HIF) Marginal Viability Fund to bridge this gap. Northamptonshire County Council and SEMLEP are fully supportive of this bid. An announcement on this bid is expected in February 2018. This funding will allow for the full build-out of Wellingborough North providing an additional source of housing delivery in the plan period.*
- 4.51 The Homes and Communities Agency is also committed to supporting housing and economic growth in the area and to accelerate delivery on the SUEs. In addition to infrastructure finance for new routes for Wellingborough East there is funding for flood alleviation works and for Wellingborough North finance for the new primary school. These show a real commitment to delivery of the development strategy in the area.*
- 4.52 Both SUEs have planning permission and the council is working in partnership with promoters of both sites to agree Reserved Matters applications and discharge conditions (see Appendix 4 of the Housing Land Supply background paper). A site visit to Wellingborough East will show the significant progress that is being made on delivering infrastructure. Both sites are expected to have several outlets with a number of housebuilders delivering at the same time. Details of other housebuilders cannot be released at this time for reasons of commercial confidentiality.*
- 4.53 As referred to above some funding has been secured for the Isham bypass, but contrary to the suggestion in the SPRU report for Hampton Brook, provision of this road does not delay housing delivery on Wellingborough North. Phase 1 of 1500 dwellings can be delivered in advance of a link road*

(refer to paragraph 10.1.2.6 of the plan). Similarly Wellingborough East has consent to deliver 300 dwellings before completion of Route 4.

- 4.54 The council has demonstrated a 6.7 year housing land supply in the [Housing Land Supply](#) background paper. This deals with the past shortfall in the first five year period of the plan (the Sedgefield approach) and applies a 20% buffer to provide choice and competition in the market as a result of past under delivery. To be consistent with previous AMRs in North Northamptonshire the five year period is taken to be 2018/19 to 2022/23, however the period using the previous year is also calculated for comparison, and also shows a supply of 6 years. A lapse rate of 11 % has been applied to sites of less than 10 dwellings, based on an assessment of actual lapse rates in the borough over the last seven years. The approach to calculating land supply is therefore considered to be robust.
- 5.55 It is acknowledged that the delivery rates in the housing trajectory for the SUEs are higher than the averages identified through the Nathaniel Litchfield & Partners (NLP) study; however that does not make them unachievable. The study did identify sites that had achieved in excess of these delivery rates. The Colin Buchanan study referred to also identified delivery rates higher than those proposed on sites of 3,000 or more dwellings. There is considered to be a high level of demand for housing in the area. Notwithstanding this, even if the conclusions from the SPRU report are accepted (which the council does not) this does not undermine the housing delivery in the plan. Table 8 of that report incorrectly calculates the 5 year land supply by including an adjustment for over optimism over the whole plan period rather than the 5 year period. A corrected table based on Table 7 of the SPRU report and Tables 11, 12 and 13 of the council's background paper is provided below:

	BCW	NLP Average	SPRU
<i>Requirement</i>			
a) Housing Requirement in JCS for 2011-2031	7000	7000	7000
b) Housing Requirement for 5 years (a/20 x5)	1750	1750	1750
c) Recorded completions 2011/12 – 16/17 and estimated completions 17/18	1841	1841	1841
d) Shortfall 2011-18 compared to annual requirement (a/20 x 7 – c)	609	609	609
e) 5 year requirement 2018 – 22 if shortfall is added to the 5 year requirement (d +b)	2359	2359	2359
f) Add 20% buffer	2831	2831	2831
<i>Supply ( 2018/19 – 2022/23)</i>			
<i>Sites with planning permission</i>	2536	2536	2536
<i>Sites allocated in adopted plans</i>	809	809	809
<i>Sites in emerging plans</i>	280	280	280
<i>Sites with potential</i>	23	23	23

Lapse Rate	-13	-13	-13
Windfall Allowance	144	144	144
Adjustment for over optimism on SUEs	0	-568	-1057
g) Total	3779	3211	2722
Five Year Land Supply (g/f x 5)	6.67	5.67	4.81

*This shows that based on the Nathaniel Litchfield & Partners (NLP) averages identified by SPRU a 5 year supply can still be demonstrated. Notwithstanding this, it is unclear why lower averages have been included for Wellingborough North, it would seem reasonable to include an average of 171 for both SUE sites. This would provide an additional 245 dwelling supply over 5 years bringing the 5 year supply total to 6.1 years. Even with SPRU's most pessimistic figure the calculation is only just below a 5 year supply.*

- 4.56 *The delivery rates for the SUEs are considered realistic. If for whatever reason however, the SUEs fail to deliver at the rates anticipated, the JCS monitoring trigger will be reached and a review of the JCS would need to be considered. It is not for the part 2 plan to fundamentally change the development strategy of the area. The government's support through significant funding for the strategy means that it is considered that any short term delays should not be used as an excuse to undermine a sustainable strategy that has been robustly tested in its development. Notwithstanding this, it is not likely that any other development strategy could deliver housing at a quicker rate than the SUEs once development is underway. There would be a significant lead in time for identifying additional suitable sites, for these to obtain consent and for them then to deliver housing. Any delay in delivery on the SUEs will only be in the short term.*
- 4.57 *The plan provides for significantly more housing than what is required in the JCS (9,279 dwellings compared to a requirement for 7,000 dwellings); it therefore already has a contingency in place. Even if the SUEs fail to deliver by between 979 and 1,644 dwellings as suggested in the SPRU report then the plan will still deliver between 8,300 and 7635 dwellings; both in excess of the JCS requirement. The housing need will therefore be delivered over the plan period. The JCS requires delivery of 350 dwellings per year and this will be met from a variety of sites including the SUEs. The recently released standardised objectively assessed housing need for Wellingborough was identified as 340 dwellings per year. The plan will therefore meet identified need. Identifying additional sites in less sustainable locations will only add to the oversupply of the plan and could threaten delivery on the SUEs by competing in the same market. It would have a negative impact on the environment, and in particular additional housing in the rural area could adversely affect the Upper Nene Valley Gravel Pits Special Protection Area, as referred to in the HRA as a result of more development within the 3km zone of influence.*

**i) Is the distribution of development the most appropriate and does the PBW provide for sufficient development in the rural area?**

4.58 As referred to above, some respondents from the development industry are critical of the testing of alternative levels of development in the rural area in the SA. This is largely linked to representations challenging the delivery rates at the SUEs and that as a consequence more growth should be distributed to the rural areas.

*BCW response:*

4.59 Responses to the SA and the testing of options for the rural area are set out at paragraphs 3.5 - 3.13.

4.60 The spatial strategy of the JCS has been found to be sound by the Inspector. He concludes that it is appropriate to restrict development in the rural area to that necessary to meet locally arising needs and/or support a prosperous rural economy and the general distribution of development across the area is considered appropriate, sustainable and consistent with the NPPF (paragraph 23 of Inspector's Report).

4.61 The Inspector concluded (at paragraph 20 of his report) that 'a significantly more dispersed pattern of growth across the Market Towns and Rural Areas would not be more sustainable or even more realistically deliverable, having regard to national policies in the NPPF and relevant local constraints. These include flood risks, impacts on existing transport networks and the resource and delivery implications for new infrastructure provision on a less concentrated basis, such as for education when the expansion of rural primary schools is not always practical or viable.' It is therefore considered that a strategy which seeks to direct growth principally to the growth town is appropriate. Should the level of growth set out in the JCS fail to be delivered there are now monitoring triggers to ensure that action is taken to address the shortfall.

4.62 An approach which directed more development to the rural area would be likely to have a negative impact on the Upper Nene Valley Gravel Pits Special Protection Area by increasing residents in the vicinity of the SPA leading to increased recreational disturbance. This is therefore not a sustainable approach.

4.63 Evidence from Appendix 1 of the [Rural Housing Allocation Methodology and Site Selection Background Paper](#) (September 2017) reflected in paragraph 7.2.8 of the PBW does not suggest that windfall development is reducing, the rates are relatively consistent. The village boundaries do not restrict development to meet identified local needs as Policy 13 of the JCS enables suitable development adjoining the boundaries to be delivered. The council also has a proactive approach to preparing [local housing needs assessments](#) in the rural area and working with local communities and delivery partners to securing housing to meet that need.

4.64 As set out in paragraph 1.23 of the Background Paper, when considering delivery of rural housing overall it is notable that a significant amount of the

*JCS requirement is already committed. This is particularly due to Earls Barton providing well in excess of the JCS requirements. This housing is therefore likely to meet needs arising from outside of Earls Barton, from the wider rural area.*

- 4.65 *It is therefore considered that there is no need to allocate sites in the remaining villages within the PBW; sufficient sites will be delivered through windfall sites, exception sites and neighbourhood plans to meet local needs (paragraph 7.2.9 of the PBW).*
- 4.66 *Paragraph 2.16 of the Housing Land Supply Background Paper (September 2017) sets out that the housing trajectory shows that 9,279 dwellings are expected to be delivered within the plan period. This is significantly in excess of the 7,000 dwellings required by the JCS and this is referenced in Table 7.7 and paragraph 7.3.3 of the PBW. This shows that the plan has been positively prepared and that the housing needs of the area will be met. It also shows that the plan is providing for a choice of housing sites in terms of size and location. The SUEs make up a significant amount of the housing land supply, but a variety of other sites are also available ensuring a robust contingency within the plan that can respond to changing circumstances.*
- 4.67 *The council has continually demonstrated a 5 year supply of housing land. Should there be any slippage in the SUEs delivery or other sites in the growth towns then the JCS has monitoring mechanisms in place which would trigger corrective action by the local planning authority to boost supply and potentially trigger a partial review of the JCS.*

### **Older Peoples accommodation**

**j) *Is Policy H3 underpinned by robust evidence and will it impact on scheme viability?***

- 4.68 Gladman Developments considers that, as currently drafted, Policy H3 appears to be overly prescriptive. It is unclear how the site threshold size has been selected and it is difficult to ascertain why a need for housing to meet the needs of older people would be triggered by schemes of 50 dwellings or 1.4ha and above. Furthermore, there is a need for further flexibility within the wording of any such policy to make it clear that this is an aspiration and that it is intended to form part of a negotiation as is indicated within the supporting text at paragraph 7.4.2 of the Plan.
- 4.69 Hallam Land Management object to the policy on the grounds that it is not consistent with the NPPF in that it is not clear what is meant by 'housing to meet the needs of older households'. They also criticise the lack of viability testing of the Policy. Bovis Homes Ltd & Stanton Cross Land Owners consider that the inclusion of Policy H3 is repetitive and unnecessary as Policy 30 (specifically Part a) of the adopted Joint Core Strategy addresses the provision of dwellings designed for older people, to meet local needs and address any gaps in housing provision in a particular settlement, neighbourhood or ward.

*BCW response:*

- 4.70 JCS Policy 30 (f) encourages the provision of specialised housing to meet the requirements of older households and says that SUEs and other strategic developments should make specific provision towards meeting these needs. The only other strategic site in addition to the SUEs in the borough is Park Farm Way /Shelley Road (Policy Site 5). Given the scale of need identified in the [Study of Housing and Support for Older People across Northamptonshire](#), completed since the adoption of the JCS, it is considered that non-strategic sites will also need to make a contribution towards providing housing for older households.
- 4.71 Paragraphs 7.4.8 - 7.4.9 explain the evidence base that has identified the need for older people's accommodation including the SHMA and evidence commissioned by the county council since the adoption of the JCS. This puts the need at between 34 and 83 dwellings per year. Given the scale of the need identified, other non-strategic sites will need to make a contribution towards providing housing for older households. The council will therefore seek to negotiate a proportion of housing suitable for older households on schemes for 50 dwellings or more (or 1.4ha of land). The threshold size is intended to ensure that larger scale sites make a reasonable contribution to meeting the identified need for older people, without this there would be concern that needs may not be met from just relying on windfall sites.
- 4.72 The approach set out in paragraph 7.4.12 and Policy H3 is considered to be flexible and reasonable. The NPPF paragraph 50 clearly sets out that local authorities should plan for a mix of housing based on current and future demographic trends and the needs of different groups of the community including older people. The approach is therefore justified and consistent with national policy.
- 4.73 Paragraph 7.4.12 sets out the range of types of accommodation that could be suitable for older households. The NPPF also includes a definition of 'older people'. To ensure consistency with the terminology in the NPPF the council would support amending the first sentence of Policy H3 to read:
- 'On sites of 50 or more dwellings, or 1.4ha or more site area, the local planning authority will seek the provision of a proportion of the housing to meet the needs of older people...'**
- 4.74 In relation to viability, the supporting text at paragraph 7.4.12 explains that "In determining an appropriate contribution the council will have regard to the viability of the scheme, evidence of local need and the scale and location of the site". Policy H 3 sets out that the precise proportion, type and tenure mix will take into account the viability of the development. The policy therefore provides sufficient flexibility.

### **Custom/Self Build**

- k) **Is Policy H5 underpinned by robust evidence and will it impact on scheme viability?**
- 4.75 Hallam Land Management consider that this is a new policy that has not been subject to consultation within previous versions of the plan, it is not supported

by evidence and would harm viability. They consider that the requirement for 5% of the total number of dwellings to be self-build is not explained or justified by any evidence. The evidence of demand for self-build plots is low (23 people which equates to 0.0003 of the population of the Borough), and it is considered that proposed Policy H6 provides a suitable mechanism for such demand to be satisfied through bringing forward exception sites. On this basis, HLM therefore strongly object to policy H5, and consider it unsound due to it being neither positively prepared nor justified.

- 4.76 Persimmon Homes Midlands, Gladman Developments and Bovis Homes raise similar concerns regarding the evidence base for the policy and the potential impacts on viability. Bovis Homes Ltd & Stanton Cross Land Owners also consider that the policy duplicates Policy 30 g) of the JCS. William Davis Ltd expresses concerns about the impact of the policy on housing delivery and the practical implications of implementing the policy.
- 4.77 In contrast Hampton Brook, in relation to its Windsor Road site is keen to set aside specific plots for custom/self-build and generally support this policy.

*BCW response:*

- 4.78 *Self-build and custom house building is an important element of the Government's housing strategy. Through the Self-build and Custom Housebuilding Act 2015 and the associated Regulations 2016, duties have been placed upon the council to grant sufficient land to meet the demand for self-build and custom housing identified on the register within three years. The NPPF, paragraph 50, clearly sets out that local authorities should plan for a mix of housing based on current and future demographic trends and the needs of different groups of the community including people wishing to build their own homes. Policies H5 and H6 therefore build upon and add greater detail to the requirements set out in JCS Policy 30 for encouraging custom and self-build housing to ensure that the council meets these responsibilities.*
- 4.79 *The self-build and custom register for the borough currently has 33 people on it, but the National Custom & Self Build Association (NaCSBA) and the Right to Build Task Force think these registers could be underestimating demand. At a North Northants level the local authorities are looking at ways to promote the registers more widely. The threshold size is intended to ensure that larger scale sites make a reasonable contribution to meeting the needs. In 2016, 130 dwellings or 34% of completions were on sites of 50 or more dwellings. 5% of this supply would account for 6.5 serviced plots. Over 3 years this would provide 19.5 plots – which would be a significant proportion of the current level on the register. These plots together with smaller windfall sites, and those already agreed on Wellingborough East, are expected to meet the identified demand over the plan period. The government's intention is to encourage this form of housebuilding to diversify the market and enable more dwellings to be built by SME builders. The demand is therefore expected to rise as this type of building becomes more popular.*
- 4.80 *The [Plan for the Borough of Wellingborough Viability Report](#) assessed the ability of a range of development types to viably meet the cumulative impacts of planning policy requirements. As referred to above, as Policy 30 already*

*requires custom build plots, the assessment was not therefore revisited following the introduction of Policies H5 and H6. The study concluded (paragraph 7.3) that some development will be unviable regardless of the council's requirements, however this situation should not be taken as an indication of the viability (or otherwise) of the council's policies and requirements.*

- 4.81 *On the basis of the viability study BNP Paribas Real Estate concluded (paragraph 7.7) that the cumulative policy requirements set out in the JCS and PBW build in an appropriate level of flexibility both specifically where policies have cost implications as well as identifying an overarching flexible approach to the implementation of the local plan which identifies at paragraph 3.9 of the JCS that 'Where... site specific viability issues prevent a development meeting policy requirements, an independent viability assessment (funded by the developer) will be required. The local planning authority will work with the developer to address viability issues so that development is not inhibited unnecessarily. This may involve approaches such as the flexible application of affordable housing requirements or the deferment of infrastructure contributions. However it will not extend to permitting poor quality development to proceed without the necessary supporting infrastructure.' This approach is set out in Policy 1 of the JCS.*
- 4.82 *The Stroud District Local Plan (adopted Nov 2015) includes a similar policy (Policy HC3). The viability study for this plan did not model the application of this policy separately but instead concluded that custom and self-builders pay a premium for their plots given the limited availability of such plots on the open market (as searches on Rightmove typically demonstrate). The council felt that this premium would more-or-less equal the 'loss' (opportunity cost) the site owner/developer would have incurred if they were not able to develop the site for conventional market housing (with the commensurate profits).*
- 4.83 *Project viability is best considered on a scheme by scheme basis due to the many variables. There are many ways of meeting the policy requirement bearing in mind that by definition 'serviced plots' does not need to mean plots sold to individual self-builders for them to build homes on a DIY basis. This could include selling to a registered provider for a community-led project or the developer could deliver the custom build dwellings themselves. Selling plots early could also provide much needed cash flow.*
- 4.84 *Landowners and housebuilders offering custom and self-build on larger sites can maximise value through one, or a combination, of the following:*
- *Deferred land payments from a Custom Build developer building out a designated parcel on a customised basis for their customers to an agreed design code and linked directly to sales; or individual Self Builders paying landowners directly for plots (which could include a premium overage given that sites are serviced);*
  - *The landowner providing equity and/or debt finance for individual plot infrastructure (through their own resources, prudential borrowing and/or HCA debt) to a Custom Build developer; or the landowner servicing the*

plots themselves with the support of a contractor, or Custom Build developer as project manager or delivery partner;

- Steadily releasing plots to maximise their premium value that will arise from the limited availability of plots in the local market;
- Selling Self Build plots with a design and build contract. This has the potential to generate higher returns when compared to working with a Custom Build enabler as there is no enabler profit to accommodate;
- Inviting smaller developers/housebuilders to compete for parcels of land to build Custom and Self Build homes for customers.

4.85 Any perceived risk to delivery of serviced plots can be effectively managed through a range of controls, including planning conditions, sales agreements and covenants and S106 planning obligations, including the scope for the council to permit that plots are built out for conventional market housing if there is no take up after a specified period of time as set out in paragraph 7.4.19 of the plan. There appears to be little evidence that self-build plots risk deliverability/marketability of other parts of a larger development if the site includes serviced plots. Evidence from larger sites which have included serviced plots has shown that, if properly controlled, they can improve the design quality and diversity of a site, attract a different buyer (bearing in mind that 75 per cent of people would not choose a home built in the last 10 years according to RIBA research<sup>1</sup>) and help drive site build out. This is because individuals building homes are not concerned about commercial 'market absorption' rates which drive site build out speeds of larger housebuilders. Examples of serviced plots as part of larger schemes include:

- Wynyard Park development, between Stockton and Hartlepool, [http://wynyardpark.com/different\\_by\\_design.html](http://wynyardpark.com/different_by_design.html) ; <https://www.harrogate-news.co.uk/2017/12/03/bringing-best-wynyard-park-harrogate/>
- Charles Church in Newcastle and Northumberland, <https://www.8848agency.com/2016/07/sales-rocket-on-developers-self-build-scheme/>; [https://www.charleschurch.com/northumberland\\_ashington/seaton-vale-self-build-10772](https://www.charleschurch.com/northumberland_ashington/seaton-vale-self-build-10772)
- David Wilson Homes, Leithfield Park in Surrey, <http://custombuildstrategy.co.uk/news-article/david-wilson-homes-completes-first-custom-build-plots-on-a-volume-site/>

4.86 Practical delivery issues such as the design of dwellings, health and safety, hours of working and the length of time a build can take can all be effectively managed. General advice on all of these issues is provided in NaCSBA's [Right to Build Toolkit](#). Design Codes and Plot Passports provide an effective way of ensuring appropriate design quality and also help the approval process on individual plots. Build-out considerations can be enforced in a range of ways such as conventional planning conditions and obligations that control noise, hours of operation and construction traffic, and planning obligations, covenants or deeds of sale for individual serviced plots that can impose build out timescales. Health and safety considerations are important, but the control

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<sup>1</sup> "75 per cent of people would not choose a home built in the last 10 years". From 'The Case for Space : the size of England's new homes' (RIBA, 2011)

*and management across a construction site can be effectively regulated by a Construction Method Statement. The specific on site considerations and methods of control will depend upon the type of custom or self-build project being undertaken.*

### **Site Specific Policies**

#### **l) *Is the policy approach for Sywell Aerodrome appropriate given its operational needs?***

- 4.87 Sywell Aerodrome Ltd recognises that although the plan contains a policy for Sywell Aerodrome, it does not correctly reflect either the importance of the airfield facility or the threat of large-scale housing developments on the future viability of its operation.
- 4.88 Given the pace of large-scale housing developments locally and the further proposals being considered along the A43 from Moulton towards the Holcot Crossroads, the management of Sywell Aerodrome have grave concerns for the future viability of the airfield operation. If large-scale housing is approved under its circuit pattern and within its Aerodrome Traffic Zone (ATZ) then the subsequent pressure on the local authorities from residents of this new housing will bring significant pressure to bear on the airfield operation resulting in a threat to its viability.
- 4.89 Sywell Aerodrome Ltd request that additional policies are included within the local plan firstly to safeguard the aviation operation at Sywell Aerodrome and thereby safeguard the airfield's future viability by preventing, resisting or blocking large-scale housing developments under the airfield circuit pattern and within the airfield's ATZ. In the event planners of the Inspectorate ignore the first local plan policy proposed and large scale housing is permitted within Sywell Aerodromes ATZ, then as a consequence of the pressure on the airfield operations to the extent it becomes un-operable and no longer viable, the Aerodrome consider there should be a second local plan policy in place. Therefore a second local plan policy is proposed by the Aerodrome in the event the first local plan policy fails. In that scenario the local plan should permit the airfield area to be allocated for alternative uses, such as for further employment or large-scale housing. The Aerodrome consider this would accord with the Government's brownfield policy.

#### **BCW response:**

- 4.90 *As paragraph 10.8.7 of the plan sets out, there has recently been an appeal granted for housing adjacent to the aerodrome, and within the previous defined boundary of the site. The paragraph states that "The council will seek to resist further residential development within the immediate vicinity of the Aerodrome in the future so that the site may be retained as a sustainable rural location for employment and aviation use, which supports the rural economy.*
- 4.91 *It is suggested that should the Inspector wish to strengthen Policy Site 9 in response to the representations from Sywell Aerodrome Ltd that a new final paragraph could be included in Policy Site 9 as follows:*

***The council will seek to resist development within the immediate vicinity of the aerodrome, if such development would prejudice aviation use on the site.***

- 4.92 *Policy Site 9 seeks to safeguard the long term viability and operation of the aerodrome. The Policy is supportive of new buildings; extensions; and changes of use, associated with aviation and other employment uses that modernise and enhance the physical environment at Sywell Aerodrome. The policy sets out that “the council would particularly support developments that provide jobs in high-end aviation, engineering and design, training and corporate entertainment.”*
- 4.93 *It is considered that the policy provides sufficient flexibility for appropriate employment uses at the aerodrome. The site would not be an appropriate location for new housing, as this would be contrary to the spatial strategy as set out in the JCS and taken forward in the PBW. It also provides an important employment site which contributes to the local economy and should be retained and supported as such.*