For and on behalf of
Hampton Brook

The Plan for the Borough of Wellingborough Part 2 Examination
Response to Inspectors Questions - Matter 5

Prepared by
Strategic Planning Research Unit
DLP Planning Limited

March 2018
The Plan for the Borough of Wellingborough Part 2 Examination
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on behalf of Hampton Brook

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Date: March 2018

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<table>
<thead>
<tr>
<th>Contents</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.0 Executive Summary</td>
<td>4</td>
</tr>
<tr>
<td>Matter 5: Site Specific Policies</td>
<td>5</td>
</tr>
<tr>
<td>1.0 Question 5.1 Site 1 – Wellingborough East Sustainable Urban Extension (SUE); Does the Policy Adequately Set Out in Sufficient Detail the Parameters Covering the What, Where, When and How the Development will be Delivered (Especially in Relation to Paragraphs 154, 155 and 156 of the Framework; and Paragraph 002 of the PPG ‘What Should a Local Plan Contain?’)</td>
<td>5</td>
</tr>
<tr>
<td>2.0 Question 5.2 Site 2 – Wellingborough North SUE (please see the questions in relation to Policy Site 1)</td>
<td>8</td>
</tr>
<tr>
<td>3.0 Site 3 – Windsor Road</td>
<td>10</td>
</tr>
</tbody>
</table>

Appendix 1: Windsor Road Concept Masterplan (Policy Site 3) | 12   |
0.0 EXECUTIVE SUMMARY

0.1 The Strategic Planning Research Unit of DLP Planning Limited (DLP) have been instructed by Hampton Brook to respond to the Inspector’s questions in respect of their land interests in the following Locations:

   a. Windsor Road, Wellingborough - Policy 3 site
   b. Top Farm Lane Great Doddington – Omission site
   c. Northampton Road Wellingborough– Omission site

0.2 Hampton Brook is a well-established local land promoter and developer of high quality developments, as such they have been fully engaged in both the Joint Core Strategy and Regulation 18 and 19 consultations. This response will refer to these earlier representations.
MATTER 5: SITE SPECIFIC POLICIES

1.0 QUESTION 5.1 SITE 1 – WELLINGBOROUGH EAST SUSTAINABLE URBAN EXTENSION (SUE); DOES THE POLICY ADEQUATELY SET OUT IN SUFFICIENT DETAIL THE PARAMETERS COVERING THE WHAT, WHERE, WHEN AND HOW THE DEVELOPMENT WILL BE DELIVERED (ESPECIALLY IN RELATION TO PARAGRAPHS 154, 155 AND 156 OF THE FRAMEWORK; AND PARAGRAPH 002 OF THE PPG ‘WHAT SHOULD A LOCAL PLAN CONTAIN?’).

1.1 This is a site which the Council have been predicting to deliver significant levels of completions in the five year period since at least 2014. Each five year land supply position statement has postponed completions on the site and at March 2018, no completions have yet been recorded (see table 1).

1.2 At present on Bovis Homes has reserved matters consent on the site for 521 dwellings and to date there are reserved matters approved for the delivering of the following areas:

a. Area 16 - Application for approval of reserved matters (WP/2010/0347) pursuant to outline planning permission WP/2004/0600/O (granted 09/08/2004) was made in August 2010 and was finally approved in October 2015. This application was for 163 dwellings additional documentation and amended plans received 21st July 2015 - further amended plans received 14th and 19th August 2015. These amendments reduce the number of dwellings to 149 (approved layout plan) (Appendix 31).


c. Area 14 Irthlingborough Road Wellingborough Northamptonshire (WP/15/00578/REM) Reserved matters application pursuant to outline WP/2004/0600 for the erection of 142 dwellings: This is the only reserved matters application that relates the development of additional dwellings. This was submitted in September 2015 and approved in November 2015.

1.3 The size of the overall development was increased by an additional 550 dwellings in addition to the 3,100 in the original consent (Ref: WP/15/00481/OUT). This was granted in February 2017 and the application was made by Bovis Homes.

1.4 No further reserved matters applications have been submitted since these three were determined in 2015.

1.5 The Final Results Presentation (01/03/2018) published by Bovis confirms they own 1,747 plots and that the main access road including the railway and river bridges are progressing well with completion scheduled for the end of 2018. The show homes are anticipated to open in Q3 2018 and first completions are expected in Q4 of 2018. Bovis expect to sell serviced parcels of land to third party developers during 2018 (page 28).

1.6 It is unlikely that Bovis will sell off Areas 14, 15 & 16 having already secured reserved matters consent for these areas and it is realistic to expect third party developers to come on board to deliver additional successive parcels.

1.7 Area 15 benefits from direct access onto Irthlingborough Road, Area 14 can only be accessed from Route 4 and so can only be delivered after Route 4 has been completed.
Area 16 is opposite Area 15 and has direct access onto Irthlingborough Road so could be delivered at the same time by another house builder.

1.8 This evidence supports Mr Bolton’s earlier evidence provided to the Inquiry for the Appeal Land adjacent to 199 Northampton Road, Wellingborough, (Ref: APP/H2835/W/16/3144277) that the site will remain in the ownership of Bovis who having spent considerable time and resources in bringing the site forward will seek to retain it as a strategic allocation within their portfolio and develop it out at an appropriate and realistic rate. This is not the rates that the council and the developer are presently suggesting.

1.9 It is my view and supported by the national evidence from NLP that even if two additional developers were to be engaged on the site, (it is over a year since Bovis submitted evidence to an inquiry that it was to market the site in November 2017) then completion rates are unlikely to run to reach a rate of 250dpa. Especially as at present only Bovis has reserved matters consent and they are likely to build out these areas consecutively rather than concurrently in line with the company’s rate of construction.

1.10 The evidence of the local market suggests even engaging one or two additional developers on this site is unlikely to increase the levels of completions beyond the averages experienced nationally for large sites. The fact that there are no other reserved matters applications from other national housebuilders for additional housing means there can be no certainty that additional completions can be reasonably expected in the short term and the involvement of just a single developer would suggest that the site is less likely to deliver at the national average of 171dpa for a site of this size.

1.11 This will reduce the contribution from this site in the next five years allowing for reserved matters to be submitted and approved, conditions to be signed off, S106 agreement signed and infrastructure provided. We accept that Bovis are intending to invite other developers onto the site, but this is likely to be once they have established themselves and secured their market position, especially as they have spent so much time and money bringing the site forward. Although Bovis have been intending to market the site since October 2016 (paragraph 3.8 of our previous November 2017 representation to the Local Plan).

1.12 In light of the above, it is our conclusion based on the available evidence that this site is that once further developers are engaged, then this site might deliver at the NLP national average for a site of this size of 171dpa. While the rate of delivery is by no means certain, it does represent a realistic likelihood of the levels of completions that could occur on site. It is however, certainly unrealistic to expect one developer to deliver 250 completions in a single year, and as many as 730 dwellings being delivered by 2022. As such, it is more realistic that the site will deliver at roughly 100dpa from 2019/20 and then 171dpa from 2022.

1.13 The evidence that has been reviewed in the SPRU Report November 2017 suggests that the trajectory for this site should be amended for the whole of the plan period. The implications for this are:

a. A reduction of 375 dwellings from the five-year supply (2017 to 2022) and 458 dwellings from the five year supply (2018 to 2023).

b. WEAST will deliver 1,894 rather than 3,024 dwellings by 2031.
### Table 1: Trajectory of the SUE’s Comparison of Council’s Forecasts Compared to Forecasts Derived from the Local Evidence Base by SPRU

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<thead>
<tr>
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"Total in 5 year period 2017-2022" and "Total in 5 year period 2018-2023"
2.0 QUESTION 5.2 SITE 2 – WELLINGBOROUGH NORTH SUE (PLEASE SEE THE QUESTIONS IN RELATION TO POLICY SITE 1)

2.1 The original application was made in 2008 and was granted on appeal; Land off the A509 Niort Way and A510 Northern Way and south of Great Harrowden, Wellingborough, Northamptonshire (ref: WP/2008/0150).

2.2 An application for a new outline planning permission to replace an extant outline planning permission, in order to extend the time limit for implementation (ref: WP/2008/0150/OEIA) for up to 3,000 dwellings was submitted in November 2012 and granted in January 2014.

2.3 This outline permission required reserved matters to be submitted within 2 years but later applications have sought to reset this time condition. These later approvals reset the date for the submission of reserved matters to November 2016. Phase 2 of the consented scheme is required to be started within 12 years or 5 years from the date of approval of reserved matters.

2.4 The reserved matters application currently pending is for 182 dwellings (WP/15/00015/REM) and was submitted by Northants LLP who are land promoters. A further reserved matters application was submitted in August 2017 under reference WP/17/00525/REM by Lagan Homes for 39 dwellings on parcel R4B. A second application is pending under reference WP/17/00377/FUL for a 66 bed care home for older people with associated parking, landscaping and access. The application was submitted by LNT Care Developments

2.5 A number of reserved matters applications have been made signing off various conditions most notably the following:

   a. Reserved Matters Application pursuant to Conditions 1, 4, 4A, 17, 18, 20, 29 and 11: Details of Phase 1a open space and landscaping and primary infrastructure, including junctions with Niort Way. (Ref. No: WP/14/00480/REM Application Permitted Nov 2014). This has not been started and is unlikely to be as access points are subject to change as a result of a further application (see c below).

   b. Variation of conditions 1, 2, 2a and removal of conditions 34, 35 and 36 of Application Reference Number: WP/2012/0525/XEIA. (Replace Condition 37 with 34). (Ref. No: WP/14/00586/VAR). This application was permitted.

   c. Reserved matters application for access, appearance, layout, scale and landscaping for 182 dwellings (Ref: WP/15/00015/REM) was submitted on 12th January 2015 and remains undetermined at March 2018. It should also be noted that since the submission of this reserved matters application over 3 years ago there has now been a further application to amend the outline consent.

   d. S73 application (WP/16/00271/VAR) to vary conditions 1-20, 24-30, 32-33 & 37 of permission WP/2012/0525XEIA. The application was submitted on the 12th May 2016 and was permitted on 15th March 2018.

2.6 The evidence that has been reviewed in the SPRU Report (November 2017) suggests that the trajectory for this site should be amended for the whole of the plan period. The implications for this are:

   a. A reduction of 450 dwellings from the five year supply (2017 to 2022) and 600 dwellings from the five year supply (2018 to 2023).
b. Wellingborough North will deliver 1,250 rather than 1,765 dwellings by 2031.
3.0 SITE 3 – WINDSOR ROAD

3.1 It is acknowledged that Windsor Road is one of ten urban allocations within the town of Wellingborough. The allocation of this site for housing development is supported, however the anticipated dwelling capacity of 60 dwellings is not agreed, as it is considered to represent an under estimation of the capacity of the site.

3.2 The merits of Policy Site 3 and its potential increased capacity are set out in our Reg 19 submission for Windsor Road.

3.3 The figure of 60 dwellings is too low given the area of developable land.

   a. The area of Policy Site 3 is around 6.5ha. The PBW states that the anticipated dwelling capacity of Windsor Road is 60. The Council have referred to a variety of figures during the course of this emerging plan ranging from 256 to 60 dwellings. Settling on the proposed allocation of 60 dwellings is not an efficient use of the land and the calculation in our Reg 18 and Reg 19 representations should be used this results in a figure of 120 dwellings for the site:

      \[
      \text{potential housing capacity} = \text{Gross site area} \times \text{permanent features factor} \times \text{gross to net factor} \times \text{net density}
      \]

      \[
      6.5 \times 0.49 \times 0.75 \times 50 = 119.44 \text{ (rounded to 120 for purposes of a planning application)}
      \]

   b. The site lies within the urban area of Wellingborough in a sustainable location. It is surrounded by 20th century residential development and exhibits little in the way of landscape, topographic or historic constraint. Development for 120 dwellings equates to approximately 18 dwellings per hectare (gross), which is reasonable and appropriate for a site in this location.

3.4 The concept masterplan in Appendix 1 outlines a total housing area of 2.55ha. This would accommodate 120 dwellings at a density of around 47 dwellings per hectare. The amount of open space in the concept plan totals 3.95ha, a figure larger than the housing area. The open space area could be reduced by around a quarter, meaning that the housing density proposed on site would also fall. For example, if the housing area was increased by 1ha, with the open space reduced by the same amount, the housing density would fall to just under 34 dwelling per hectare.

The Suitability of the Site for Development

3.5 The site is well contained in terms of the existing urban area of Wellingborough and forms a natural expansion of the adjoining residential areas. It is well located to access the services and facilities with the town.

3.6 It is noted in paragraph 10.2.1 that the land is currently underutilised and subject to an element of fly tipping and antisocial behaviour. This emphasises the need for development at this site to come forward in a timely manner, to improve the amenity of the area as well as reduce antisocial and illegal behaviour.

Existing Biodiversity

3.7 It is acknowledged that the eastern edge of the site is important in terms of particular flora as well as the green infrastructure link existing at the west of the site. It is envisaged this green corridor can link up from the west to the east of the site, with a semi natural open space area to the east of the site. A green buffer will run around the perimeter of the development to help mitigate noise and views from the A45. This buffer can incorporate existing trees and hedgerows in this area, where practical.
**Vehicular Access**

3.8 The site has readily available access from Bourton Way.

3.9 It is understood that the Council is still in ownership of four semi-detached properties along Windsor Road which are to be demolished to make way for two different access points. It is acknowledged that the PBW states that vehicular access should only be taken from Windsor Road. This is against the general principles of urban design as well as the specific principles of JCS Policy 8 as it effectively limits the connectivity of the new development. JCS Policy 8 states that development should;

“Create connected places by ensuring that it connects to the maximum number of local streets, avoiding dead ends, to allow it to integrate into the wider settlement and to connect to existing services and facilities” (JCS Policy 8 a i.)."

3.10 Therefore DLP strongly suggest that vehicular access should also be taken off Bourton Way, to provide a better connected development and conform with JCS Policy 8.

3.11 However, were the Inspector is minded to leave the policy text as only featuring vehicle access to the site from Windsor Road, we would encourage a small access road to a small development off of Bourton Way. This section of land would lend itself well to a small Self-Build scheme.

3.12

**Pedestrian Access**

3.13 Our Client is keen to promote good access for pedestrian and cyclists in line with JCS Policy 8 and generally we agree with the text for pedestrian access in Policy Site 3. It is crucial to create a sustainable development in this location as it is bounded by roads on two sides. This means that access through to Windsor Road to get to public transport routes as well as access through to the existing Wilby Way estate are of paramount importance. There is an opportunity to provide good access alongside the green infrastructure corridor that would run through the site from east to west. This would create good connectivity and legibility through the site, as well as encouraging sustainable methods of travel such as public transport and cycling. Additional access opportunities for pedestrian links are available onto Valley Road to the east and Aldsworth Close to the south. These links will be exceptionally well connected, benefitting from the green infrastructure corridor which runs through, and around the perimeter of the site, as evident in Appendix 1 of the Reg 19 submission.

**Flood Risk**

3.14 As identified in PBW paragraph 10.2.4, there is a very small section of the site within flood zone 3, less than 350sqm. There is a small watercourse running through the eastern section of the site. There is the advantage of using this watercourse as part of a sustainable drainage system, by using it the natural features of the land to help drainage and reduce artificial drainage in line with paragraph 10.2.4. A Sustainable Urban Drainage Scheme such as a balancing pond will be provided at the east of the site to reduce flood risk.

**Conclusion**

3.15 The dwelling capacity for Windsor Road (Policy Site 3) should be increased from 60 to 120 dwellings, as demonstrated (in concept form) in Appendix 1.
APPENDIX 1: WINDSOR ROAD CONCEPT MASTERPLAN (POLICY SITE 3)
Policy Site 3

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<td><strong>Total Housing Area</strong></td>
<td><strong>2.55</strong></td>
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Open Space: 3.95 ha
Policy Site 3 Area: 6.5 ha

Plan for The Borough of Wellingborough
Policy Site 3 – Windsor Road

Concept Masterplan

Scale: 1:1250 (A2)
Date: 2 Nov 2017
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