



Borough Council of  
**Wellingborough**

# Town Centre Area Action Plan Development Plan Document Regulation 31 Statement

September 2008



**North Northamptonshire**  
Local Development Framework

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INVESTOR IN PEOPLE

## 1. INTRODUCTION

- 1.1 This statement provides information about the representations received by the Borough Council following the submission of the Town Centre Area Action Plan to the Secretary of State. The statement is prepared under Regulation 31(2) (c) of the Town and Country Planning (Local Development) (England) Regulations 2004, which requires the Borough Council to send to the Secretary of State:
- (i) a statement of the total number of representations made;
  - (ii) copies of the representations; and
  - (iii) a summary of the main issues raised in the representations.
- 1.2 A copy of this statement is being made available on the Council's website at: [www.wellingborough.gov.uk](http://www.wellingborough.gov.uk); at the Council's offices; and at all local libraries.

## 2. THE TOWN CENTRE AREA ACTION PLAN

- 2.1 The Town Centre Area Action Plan Development Plan Document was formally submitted to the Secretary of State on 26<sup>th</sup> June 2008 at the start of a six week consultation period which ran until the 7<sup>th</sup> August 2008. During this period:
- The Submission Plan and accompanying documents were published on the Council's website and copies were made available for inspection at the Council's offices and at libraries in the Borough;
  - An advertisement was placed in the local newspaper (the Evening Telegraph) on June 26<sup>th</sup> 2008 indicating where documents were available for inspection and how and when to submit formal representations;
  - An article on the Plan was included in the Council's newspaper (The Link) which is delivered to every household in the Borough;
  - Several articles on the Plan were published in local newspapers;
  - Letters were sent to a wide range of consultees informing them of the consultation, where documents were available to view and how to comment;
  - The Plan was advertised on the local radio station;
  - An information event consisting of a 'drop-in' session followed by a presentation and question and answers evening was held at a venue in the town centre; and
  - Exhibitions were held at several venues including the Swansgate Centre on the 4<sup>th</sup> and 5<sup>th</sup> July; Wellingborough Library from 8th July until 14th July; Sainsburys from 21st to 27th July; and Morrisons on 30th and 31st July.

## 3. REPRESENTATIONS

- 3.1 The Council received responses from 20 respondents. The respondents submitted 114 representations of which 75 have questioned the 'soundness' of the Plan. A total of 5 respondents wish to appear at the oral examination. In addition, one respondent submitted representations which put forward an additional site allocation for the inclusion of the Swansgate car park within the primary shopping area. This alternative site has been advertised with representations invited during a six week period commencing on 1<sup>st</sup> September 2008 and ending on 8<sup>th</sup> October 2008.

3.2.1 The following table illustrates those policies, paragraphs etc in respect of which representations have been made and indicates the nature of the representations.

<b>Title</b>	<b>Sound</b>	<b>Unsound</b>	<b>Total</b>
<b>All</b>	40	75	114
<b>Wellingborough Town Centre Area Action Plan - Submission Version</b>	8	12	20
<b>EXECUTIVE SUMMARY</b>	1	1	2
<b>Section 1.1</b>	1	0	1
<b>Paragraph 1.2.1</b>	1	0	1
<b>Paragraph 1.2.10</b>	0	1	1
<b>Paragraph 1.8.2</b>	1	0	1
<b>Paragraph 2.2.2</b>	0	1	1
<b>Paragraph 2.2.4</b>	1	0	1
<b>Paragraph 2.2.8</b>	0	1	1
<b>Paragraph 2.2.10</b>	0	3	3
<b>Paragraph 2.2.17</b>	0	1	1
<b>Paragraph 3.2</b>	0	1	1
<b>Chapter 4</b>	1	2	3
<b>Objective 4</b>	2	0	2
<b>Objective 6</b>	1	1	2
<b>Objective 8</b>	1	1	2
<b>Objective 9</b>	2	0	2
<b>Chapter 5</b>	1	0	1
<b>Section 5.1</b>	0	1	1
<b>Policy WTC 2</b>	0	5	5
<b>Policy WTC 3</b>	0	2	2
<b>Paragraph 5.4.1</b>	0	1	1
<b>Policy WTC 7</b>	1	1	2
<b>Paragraph 5.4.13</b>	0	1	1
<b>Paragraph 5.4.14</b>	2	0	2
<b>Policy WTC 12</b>	1	2	3
<b>Policy WTC 13</b>	1	1	2
<b>Policy WTC 14</b>	1	1	2
<b>Section 5.7</b>	0	1	1
<b>Policy WTC 15</b>	0	1	1

Title	Sound	Unsound	Total
<b>Policy WTC 17</b>	1	1	2
<b>Section 5.10</b>	0	4	4
<b>Policy WTC 18</b>	0	2	2
<b>Policy WTC 19</b>	0	3	3
<b>Paragraph 5.10.8</b>	0	1	1
<b>Policy WTC 20</b>	1	2	3
<b>Paragraph 5.10.13</b>	1	0	1
<b>Policy WTC 21</b>	2	0	2
<b>Policy WTC 22</b>	2	1	3
<b>Policy WTC 25</b>	0	2	2
<b>Paragraph 5.11.4</b>	0	1	1
<b>Chapter 6</b>	0	1	1
<b>Policy PS 1</b>	0	5	5
<b>Policy PS 2</b>	0	1	1
<b>Policy PS 3</b>	0	1	1
<b>Policy PS 4</b>	2	1	3
<b>Section 6.7</b>	0	1	1
<b>Policy PS 10</b>	1	3	4
<b>Chapter 7</b>	0	1	1
<b>Section 7.4</b>	0	1	1
<b>Chapter 8</b>	1	0	1
<b>Appendix A</b>	1	0	1
<b>Appendix D</b>	0	1	1

#### 4. SUMMARY OF MAIN ISSUES

4.1 The following is a summary of the main issues raised in representations about the soundness of the Town Centre Area Action Plan.

##### ***Executive Summary***

- This could usefully include a summary of the strategy.
- The reference to the Plan resulting in 'no significant adverse effects' upon the conservation objectives etc should be amended to 'It is considered that the Town Centre Area Action Plan will not result in any likely significant effect upon the conservation objectives etc ....'

##### ***Background***

- The Plan should recognise that RSS8 and the MKSM Sub-Regional strategy indicates that the development of previously developed and

greenfield land should occur in parallel with no artificial phasing or prioritisation in favour of brownfield sites (MKSM Policy 4).

### ***Wellingborough Town Centre: Key Issues***

The Plan should acknowledge:

- that RSS8 and the MKSM Sub-Regional strategy indicates that the development of previously developed and greenfield land should occur in parallel with no artificial phasing or prioritisation in favour of brownfield sites;
- the high quality transport links proposed between the town centre, Stanton Cross and East of Stanton Cross;
- that the need for convenience goods is higher than identified in the evidence base;
- that the town centre is constrained and therefore edge of town sites will be needed to deliver those commercial uses, e.g. superstore provision, which cannot be accommodated in the town centre; and
- the need for parallel proposals for new facilities within the town centre and at the sustainable urban extensions.

### ***The Vision***

- The vision should refer to the planned growth within the sustainable urban extensions.

### ***Plan Objectives***

- The objectives should be measurable;
- the scale of demolition will destroy the character of the town, contrary to objective 4 of the Plan;
- Objective 6 should include reference to water resource efficiency; and
- Objective 8 should refer to reducing flood risk via strategic provision and design of green spaces.

### ***General Policies***

- **Policy WTC2:**
- The need for convenience goods is higher than identified in the evidence base and the Plan should recognise that the centre is constrained and therefore edge of town sites will be needed to deliver those commercial uses, e.g. superstore provision, which cannot be accommodated in the town centre.
- More detail is required to indicate how new town centre development will be linked with existing areas to ensure a coherent/ well connected town centre that does not compromise the future success of the Swansgate Centre.
- Greater flexibility is required in the event that the proposed developments fail to come forward due to adverse economic conditions. More emphasis should be given to improving the existing retail offer and looking at the potential to improve and enhance the Swansgate Centre.
- The primary shopping area should be extended to incorporate the Swansgate Centre car park and/or this area should be identified as an extension to the primary shopping centre.

- **Policy WTC3:**
- More detail on how new retail and leisure development will be linked with existing areas, including the Swansgate centre, is required.
- The primary shopping area should be extended to include the Swansgate car park and/or this area should be identified as an extension to the primary shopping area.
  
- **Policy WTC7:**
- Amend the Policy wording or supporting text to include the following: 'To prevent adverse impacts on the European site, any proposals for improvements to Swanspool Brook or other areas in close proximity to the Upper Nene Valley Gravel Pits pSPA will be designed in consultation with Natural England.'
  
- **Policy WTC11 - supporting text:**
- This should recognise that commercial development will be provided at Stanton Cross and East of Stanton Cross
  
- **Policy WTC12:**
- The Northern Interceptor should take a different route in order to avoid endangering the stonework of the United Reform Church, which is a listed building.
- The Policy should refer to the need to protect, enhance and reuse, where appropriate, locally important buildings outside the conservation area.
  
- **Policy WTC13:**
- The Policy wording should recognise that any affordable housing provision is only a target and that the precise level required on each site is a matter for negotiation.
  
- **Policy WTC14:**
- The proposed north/south pedestrian/cycle route will affect the Salem Hall car park resulting in no parking for the disabled and mothers and toddlers. This conflicts with the intention of making provision for improved community facilities. The pedestrian/cycle way needs to be re-routed further along Salem Lane to the east.
  
- **Policy WTC15 and supporting text:**
- Amend to include reference to managing surface water in accordance with guidance in Annex F, PPS25.
- Include more detail on how new retail and leisure development will be linked with existing areas including the Swansgate centre to ensure that Wellingborough remains a coherent and well connected town centre.
  
- **Policy WTC17:**
- Opportunities to reduce flood risk via strategic provision and design of green spaces should be actively sought and encouraged. In particular, opportunities to increase the access and easement corridor adjacent to

Swanspool Brook should be investigated and incorporated into design layout and landscaping proposals as part of a strategy to reduce flood risk from the watercourse.

- Amend the Policy wording or supporting text to include the following: 'To prevent adverse impacts on the European site, any proposals for improvements to Swanspool Brook or other areas in close proximity to the Upper Nene Valley Gravel Pits pSPA will be designed in consultation with Natural England.'
- **Policy WTC18 and supporting text:**
- In determining changes to traffic circulation, any impacts associated with the changes to traffic flows and distribution caused by the sustainable urban extensions must be recognised.
- A comprehensive transport strategy is required to resolve congestion and improve accessibility and circulation into and around the town centre.
- New development will need to be accompanied by a robust travel plan to encourage residents/visitors to use alternative modes of transport to the private car.
- An alternative route for the Northern Interceptor should be found and disabled parking spaces within easy access of the medical centre in Queens St should be provided along with short-stay parking spaces for the exclusive use of patients.
- Concern about the ability of town centre roads to cope with increased traffic, and the viability of one way systems.
- The Northern Interceptor route will result in the widening of several streets and will create a main road that will split the local community from local services. Historic workers cottages, which are all that remain of the local boot and shoe industry in this area, may also have to be demolished.
- **Policy WTC19 and supporting text:**  
The Plan needs to:
  - clarify how measures to improve bus priority and services in the town centre will be delivered in terms of the timescale for delivery, the sources of funding and who will be responsible for undertaking the necessary works; and
  - recognise the possibility of the high quality bus loop proposed as part of the approved Stanton Cross scheme being enhanced to also serve East of Stanton Cross.
- **Policy WTC20 and supporting text:**
- Particular attention should be given to the role of parking as part of the wider strategy to encourage more sustainable travel as set out in the Transport Strategy for Growth.
- The Swansgate Centre car park should be included within the primary shopping area.
- The proposed multi-storey car park on Queens St will lead to an inordinate volume of traffic, contrary to the Council's environmental policy, and will blight the environment in an area of low rise housing. To avoid major upheaval to the local community and a drastic increase in town traffic and

pollution in a residential area the High St car park should be retained and a new car park should be positioned on the edge of the town.

- **Policy WTC21 – supporting text:**

- Include reference to providing high quality bus, pedestrian and cycle links between residential areas in the town centre and the station and outlying employment areas.

- **Policy WTC22 and supporting text:**

- The Plan should provide more detail as to how new retail and leisure development will be linked with existing areas, including the Swansgate centre.
- Include reference to providing high quality bus, pedestrian and cycle links between residential areas in the town centre and the station and outlying employment areas.

- **Policy WTC25 and supporting text:**

- A water efficiency policy related to WTC25 should be included.
- Incorporate guidance as stated in PPS25 Annex F in general and Paragraph F10 in particular.
- The installation of new water infrastructure should be co-ordinated with the Plan.
- Growth must be infrastructure led - the construction of new houses has to be linked to employment within the town and borough if Wellingborough is not to become a dormitory town.

***Development Opportunity Site Policies***

- **General comments:**

- There needs to be a high degree of certainty that sites being relied upon for new housing are deliverable, otherwise consideration must be given to maximising the available capacity on identified sites to ensure the delivery of the required housing provision.
- The individual and cumulative risk of flooding from land and sewers arising from the development of sites A to I should be assessed.

- **Policy PS1:**

- More detail on how new retail and leisure development will be linked with existing areas, including the Swansgate centre, should be provided to ensure that Wellingborough remains a coherent and well connected town centre and that new development does not compromise the future success of the Swansgate centre.
- Protected' parking provision should be provided so that emergency services, funeral and wedding parties, and the disabled and elderly members of the congregation have direct access to the front door of the United Reform Church in High St.

- **Policy PS10 and supporting text:**

- The proposed building should be used for cultural purposes.

- A flood defence consent will be required for the pedestrian bridge and any development or landscaping within 9 metres of the top of the bank.
- Proposals should enhance access/easement corridors adjacent to the brook and include measures to reduce flood risk from the watercourse.
- Amend the Policy wording or supporting text to include the following: 'To prevent adverse impacts on the European site, any proposals for improvements to Swanspool Brook or other areas in close proximity to the Upper Nene Valley Gravel Pits pSPA will be designed in consultation with Natural England.'

***Implementation Framework:***

The Plan should:

- demonstrate the commitment from key stakeholders and delivery agencies to implement the policies; and
- elaborate on the implications of sites or funding failing to come forward.

***Appendix D Proposals Map:***

- Consideration should be given to diverting traffic along St Johns Street (or another alternative route) rather than Queen Street

***Other Responses:***

• **Overall strategy:**

- The proposal to introduce large department/national stores is flawed as the strategy fails to take account of population demographics which indicate an ageing population and a large proportion of individuals, single-parent families and older family groups dependent on benefits. The Plan should be changed to provide for local independent stores in line with the socio-economic groups that will use them.

• **Policy wording:**

- In many cases, the policies should be worded differently to emphasise that the Plan is concerned with more than land use proposals and that it is not just the Borough Council that will be responsible for its implementation.

• **Habitat Regulations Assessment:**

- The assessment is sound, although the following changes should be made to ensure that the conclusion that the Plan will have 'no likely significant effect' on any European or Internationally designated sites can be considered to be robust:
- insert 'Where it cannot be demonstrated that a development proposal will not have an adverse effect on the integrity of a site of international importance to nature conservation, such development is not supported by the Plan and will not be permitted.' within the introduction; and
- change either the policy wording or the supporting text of policies WTC7, WTC17 and PS10 'To prevent adverse impacts on the European site, any proposals for improvements to Swanspool Brook or other areas in close proximity to the Upper Nene Valley Gravel Pits pSPA will be designed in consultation with Natural England.'