



Strategic Planning & Research Unit

For and on behalf of
Hampton Brook

The Plan for the Borough of Wellingborough Part 2 Examination
Response to Inspectors Questions - Matter 4

Prepared by
**Strategic Planning Research Unit
DLP Planning Limited**

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0.0 Executive Summary

- 0.1 The Strategic Planning Research Unit (SPRU) of DLP Planning Limited (DLP) have been instructed by Hampton Brook to respond to the Inspector's questions in respect of their land interests a 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 4: IS THE PLAN EFFECTIVE IN ITS OVERALL DELIVERY OF HOUSING OVER THE PLAN PERIOD?

- 1.0 QUESTION 4.1 FIVE YEAR HOUSING LAND SUPPLY: CAN THE PLAN PROVIDE A FIVE-YEAR SUPPLY OF DELIVERABLE HOUSING? IN PARTICULAR, IS THE SIGNIFICANT RELIANCE ON THE TWO SUES BOTH JUSTIFIED AND REALISTIC IN VIEW OF RECENT AND LIKELY FUTURE RATES OF IMPLEMENTATION?**
- 1.1 The Housing Land Supply Background Paper 2017 sets out the trajectory for the plan in appendix 2, page 13, table A2.1. There is no detailed trajectory giving the individual delivery assumptions for each of the commitments or the allocations. As such it is difficult to undertake a full examination of the five year land supply situation.
- 1.2 To this extent that it is not possible to undertake a forensic examination of the 5 year land supply the evidence base is inadequate as required by the PPG the plan fails in terms of soundness.
- 1.3 The matter of 5 year land supply was not addressed in any detail at the Joint Core Strategy which was submitted for examination on 31 July 2015 with the examination hearings were held between 17 and 27 November 2015.
- 1.4 In respect of the two SUE's in Wellingborough these were not subject to a separate hearing session at the examination and there have been substantive changes to the positions to that contained in the evidence submitted to the examination in the form of the Joint Statements.
- 1.5 The JCS Inspector's report makes three references to the five-year land supply position in paragraphs 61, 146 and 149. The Inspectors conclusion that there was a five-year land supply was based upon the following factors:
- a. a trajectory that would be challenging to deliver on time (IR paragraph 53);
 - b. the early implementation of SUE's and what the Inspector considered were ambitious rates of delivery (IR paragraph 58);
 - c. the identification of further non – strategic sites where necessary.
- 1.6 It should be noted that that the Council no longer supports the land supply figures which they put to the JCS Inspector.
- 1.7 The changes required by the Inspector to make the JCS sound included a mechanism for an early review of the JCS. Table 1 (page 17 of the SPRU Report 2017) undertakes this test and highlights that of the 1,025 that the JCS forecast to be delivered between 2016 and 2019 at best this would result in 150 dwellings or just 15% of the contribution from the SUE's being delivered. This is significantly less than the 75% delivery required by paragraph 9.18 of the JCS and the trajectory in appendix 4 of the JCS) and therefore this should require a partial review of the JCS.
- 1.8 The Regulation 19 submissions on behalf of Hampton Brook included a report from SPRU regarding the 5 year land supply and in particular the delivery of the two large SUE's. In terms of the contribution from these two sites this report concluded:
- a. There was a long history of the Council and promoters of the SUE's being over optimistic regarding both lead in times and delivery rates (table 2 page 18 SPRU November 2017);

- b. National and Local Research (SPRU November 2017 Paragraphs 3.27 to 3.49, and 3.50 to 3.83) on delivery rates and lead in times suggested both longer lead in ties and lower rates of delivery than those assumed by the plan;
 - c. **Wellingborough East (WEAST)** for the 5 year period 2017 – 2023 WBC assumed 730 dwellings by 2022 (0 + 55 + 175 + 250 + 250) and 983 by 2023. The SPRU forecast is 355 dwellings by 2022 (0 + 55+ 100 +100 +100) and this increases to 526 dwellings by 2023. The difference over the five years to 2022 is 375 dwellings which increases to 457 dwellings by 2023;
 - d. **Wellingborough North** WBC assumes 800 dwellings (0 + 100 + 200 + 250 + 250) by 2022 and 1,050 dwellings by 2023. SPRU assumed 350 dwellings by 2022 (0 + 50 + 100 +100 +100) and 450 by 2023. The difference over the five years to 2022 is 450 dwellings which increases to 600 dwellings by 2023.
- 1.9 The difference in the five year land supply that results from the over optimistic assumptions of build out rates is a reduction of some 825 dwellings by 2022 and 1,057 by 2023.
- 1.10 In paragraph 3.7 of the SPRU (November 2017) report, the conclusions of the inquiry into the Appeal Land adjacent to 199 Northampton Road, Wellingborough, (Ref: APP/H2835/W/16/3144277) (November 2016) which concluded that there was just a 5.1 years supply of land are set out as follows:
- a. WEAST:
 - i. The completions rates proposed were accepted by the Inspector based on the assertion by Bovis in an email received during the inquiry they would market its sites in WEAST to other developers in October 2016 (IR paragraph 48).
 - ii. The contribution to completions from these other developers would occur before 2020/21 (IR paragraph 49).
 - iii. That with these other developers WEAST would be likely to deliver at 200dpa (IR paragraph 50).
 - b. Wellingborough North:
 - i. That development would not start delivering homes in 2017/18 but would start in 2018/19.
 - ii. There would be 50 dwellings delivered in 2018/19, 150 in 2019/20 and 200 in the following years.
- 1.11 The evidence at this inquiry included both national and local research on delivery rates although neither the most recent evidence from NLP “Start to Finish” nor the recent rates of completions on comparable sites were available at that time.
- 1.12 The Housing Land Supply Background Paper (September 2017) further updated the trajectory of the SUE’s from that previously published in particular:
- a. Wellingborough North:
 - i. Delivery of 25 units this year 2017/18;
 - ii. An increase in the maximum rate of delivery to 300 dwellings per annum.
- 1.13 The situation for both sites has changed as follows:

- a. WEAST:
 - i. The Council and developers have an established track record of overoptimistic forecasts regarding the delivery of this site.
 - ii. Bovis have, as per Mr Bolton's evidence at the inquiry suggested, not sold off those sites for which they have obtained reserved matters consent for.
 - iii. There is no available evidence to support the forecast level of completions of 250 dwellings a year. There is unrealistic prospect of this level of housing being delivered on this site
 - iv. There is no realistic prospect that the levels of housing will be delivered in the next five years.
 - b. Wellingborough North:
 - i. There will be no completions this year;
 - ii. There is no available evidence to support the forecast level of completions of 250 dwellings a year. There is unrealistic prospect of this level of housing being delivered on this site;
 - iii. BCW have only just granted permission for the S73 variation to WNorth on Friday 15 March 2018;
 - iv. Reserved matters, design code, phasing programme are to be resubmitted and approved;
 - v. BCW also have to sell their land to Midtown Capital for works to commence – Phase 1A is wholly within BCW ownership at present there is no timescale for this sale.
- 1.14 There is no realistic prospect of the SUE's delivering housing at the levels forecast for the next five years.
- 1.15 In the 2016 Appeal (Land adjacent to 199 Northampton Road, Wellingborough [Ref: APP/H2835/W/16/3144277]) it was agreed in a Statement of Common Ground that completions at Park Farm would occur in 2 years i.e. 2018/19. The Council have now moved this back to 2019/20, however there has been no substantive movement on this site in terms of correspondence for a considerable period of time the last being an agreement to an extension of time.
- 1.16 Reviewing the correspondence online (Ref: WP/15/00727/OUT), highlights there has been extensive discussions between both parties regarding highways, and until this is successfully resolved it will impact upon the Council's current trajectory for the site.
- 1.17 A review of the correspondence includes that from Richard Hall at KeirWSP on behalf of Northamptonshire Highways (19 August 2016), which refers to the provision of a roundabout for access into the site and that the client's consultant refer to the dualling of the A509 which the county Council require prior to the commencement of the site.
- 1.18 Sally Aldern at Hallam Land Management has previously stated that it most unlikely that the site would be divided up but would be sold as single lot to one housebuilder.
- 1.19 At present there is no implementable planning permission on this site. In the event of an approval being forthcoming and the signing of the legal agreement would still require a further year for the reserved matters application, site preparation, as well as the

dualling of the A509 and the provision of the new roundabout. This suggests that suggesting completions in 2019/20 is optimistic.

- 1.20 Given that this site has clearly stalled, it is considered that it will not deliver housing completions until 2020/21 at the earliest.
- 1.21 A further site that was included in the five-year land supply at the time of the appeal was the town centre Site C TCAAP High Street being promoted by Keepmoat. This is a site which the Council considered 2 years ago would be delivering housing and it has not delivered. It is a stalled site.
- 1.22 Taking into account the realistic prospect of delivery of housing on these sites then there is unlikely to be a five-year housing land supply upon the adoption of part 2 of this plan as demonstrated in the table below:

Table 1 Five Year Land Supply Calculation

	2017 – 2022		2018 - 2023	
	BCW	SPRU	BCW	SPRU
Requirement				
a) Housing Requirement in JCS for 2011 - 2031 7000	7,000	7,000	7,000	7,000
b) Housing Requirement for first 6/7 years (a/20 x 6 or 7)	2,100	2,100	2,450	2,450
c) Recorded completions 2011/12-16/17 and estimated completions 17/18 (122 +116 +255 +384 +380+ 247 +337)	1,504	1,504	1,841	1,841
d) Shortfall i) 2011-17 compared to annual requirement (a/20 x 6 – c) ii) 2011-17 compared to annual requirement (a/20 x 7 – c)	596	596	609	609
e) Housing Requirement for 5 years (a/20 x 5) plus backlog	2,346	2,346	2,359	2,359
f) 5 year requirement 2017 - 2022 and 2018-23 (shortfall added to the 5 year requirement (d + b) 2359 f) add 20% buffer	2,815	2,815	2,831	2,831
Supply				
Sites with planning permission	2,536	2,536	2,536	2,536
Sites allocated in adopted plans	809	809	809	809
Sites in emerging plans	280	280	280	280
Sites with potential	23	23	23	23
Lapse Rate	-13	-13	-13	-13
Windfall Allowance	144	144	144	144
Adjustment for adding 2017 and subtracting 2023	-395	-395		
Adjustment for over optimism on SUE's	0	-1,013	0	-1,271
Total	3,384	2,371	3,779	2,508
Fiver year land supply	6.01	4.21	6.67	4.43

Note: Supply is for 2018 to 2023 from September 2017 background paper

Table 2 Trajectory of the SUE's and other sites - Comparison of Council's Forecasts Compared to Forecasts Derived from the Local Evidence Base by SPRU

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	Total in plan period	Total in 5 year period 2017-	Total in 5 year period 2018-
WEAST																	
BCW	0	55	175	250	250	254	270	270	250	250	250	250	250	250	3,024	730	984
SPRU	0	55	100	100	100	171	171	171	171	171	171	171	171	171	1,894	355	526
Difference to SPRU	0	0	-75	-150	-150	-83	-99	-99	-79	-79	-79	-79	-79	-79	-1,130	-375	-458
WNorth																	
BCW	0	100	200	250	250	250	250	250	215	0	0	0	0	0	1,765	800	1,050
SPRU	0	50	100	100	100	100	100	100	100	100	100	100	100	100	1,250	350	450
Difference to SPRU	0	-50	-100	-150	-150	-150	-150	-150	-115	100	100	100	100	100	-515	-450	-600
Park Farm																	
BCW	0	0	25	50	75	100	100	100	100	50	0	0	0	0	600	150	250
SPRU	0	0	0	25	50	75	100	100	100	100	50	0	0	0	600	75	150
Difference to SPRU	0	0	-25	-25	-25	-25	0	0	0	50	50	0	0	0	0	-75	-100
Site C TCAAP																	
BCW	0	25	44	44	0	0	0	0	0	0	0	0	0	0	113	113	113
SPRU	0	0	0	0	0	0	25	44	44	0	0	0	0	0	113	0	0
Difference to SPRU	0	-25	-44	-44	0	0	25	44	44	0	0	0	0	0	0	-113	-113
Total Reduction																	
Total reduction SPRU	0	-75	-244	-369	-325	-258	-224	-205	-150	71	71	21	21	21	-1,645	-1,013	-1,271

**2.0 QUESTION 4.2 ALLOCATED SITES AND OTHER HOUSING OPPORTUNITIES:
WHAT IS THE POTENTIAL OF THE ALLOCATED SITES AND OTHER
OPPORTUNITIES TO DELIVER THE OVERALL HOUSING PROVISION IN THE
PLAN?**

- 2.1 The Housing Land Supply Background Paper 2017 sets out the trajectory for the plan in appendix 2, page 13, table A2.1. There is no detailed trajectory giving the individual delivery assumptions for each of the commitments or the allocations. As such it is difficult to undertake a full examination of how the allocations and other policies of the plan are going to deliver the whole plan provision.
- 2.2 To this extent the evidence base is inadequate, and the plan fails in terms of soundness as it is not justified.
- 2.3 Central to forecasts in Appendix 2 of the background paper are the unprecedented rates of delivery that have been forecast to occur on the SUE's. There is no evidence that these rates can be achieved in the Wellingborough market, they are in the context of the market indicators set out in the SPRU Report 2017, unrealistic insofar as there is no realistic prospect of housing being delivered at these forecast rates.
- 2.4 In summary if the rates of delivery for the SUE's reflect what may realistically be expected then the two SUE's will deliver the following within the plan period:
- a. WEAST will deliver 1,894 rather than 3,024 dwellings by 2031;
 - b. North Wellingborough will deliver 1,250 dwellings rather than 1,465 dwellings by 2031.
- 2.5 While it is accepted that over the plan period there might be fluctuations in the rates of the delivery to base a plan on the assumption that completions rates will be achieved at levels not only in excess of that which has been previously experienced, but as high as one of the top performing SUE's in the country is unrealistic.
- 2.6 Even if our evidence on delivery is not accepted, it nevertheless highlights that there is a substantial risk that the plan will fail, possibly within the very early years, this is because the over reliance on these two large SUE's producing unprecedented levels of completions concurrently in a single urban area. Furthermore, we have clearly highlighted the inaccuracy of the Council's assessment of land supply. Therefore, there is considerable risk that sites will not deliver as expected. The process taken by the Council in assessing delivery has not changed following the failure of sites to deliver. Instead, sites are merely 'rolled forward' a number of years.
- 2.7 Paragraph 14 of the plan requires Plans to be flexible and able to respond to rapidly changing circumstances.
- 2.8 Paragraph 154 requires plans to be aspirational it also requires them to be realistic.
- 2.9 As presently drafted, there is no flexibility within the Plan and the lack of any action regarding the response to the monitoring in paragraph 98 of the JCS is a clear illustration that this approach will not be able to respond in a timely manner.
- 2.10 In respect of the potential of allocated sites, in line with the draft Framework, there is in our view the potential to increase the level of provision on some allocated sites, as well as the untapped potential of identifying a larger number of smaller sites. The latter will add a much-needed element of flexibility to this plan.
- 2.11 As highlighted in the Regulation 19 submission, there is the ability for the allocation at Windsor Road, Wellingborough (Policy 3 site) to deliver more than the 60 dwellings

presently allocated. It is considered that this site could deliver in the region of 120 dwellings. (See also response to matter 5 and appendix 1).

- 2.12 There are other opportunities to bring forward smaller sites which are readily and easily developable which would assist in meeting the housing requirement in the early years of the plan and increase the plan's flexibility, as well as addressing what in our opinion at least is an issue with the 5-year land supply. Such opportunities in Wellingborough include the limited development of approximately 20 dwellings at Northampton Road Wellingborough (HW14 – Omission site see plan in appendix 2).
- 2.13 There are also opportunities for the release of small sites in the rural areas which would assist in meeting identified local needs in Rural Areas. Such sites would not be of a magnitude to dilute the urban focus of the plan but would by meeting local needs locally increase the diversity of the housing offer.
- 2.14 An example of how such small scale rural allocations that could be made to assist in adding flexibility to the plan is the omission site at Top Farm Lane Great Doddington (appendix 3). While the scale of the site has varied in terms of the submissions the plan in appendix 3 demonstrates that an expansion of the settlement boundary at Great Donnington to include land functionally related to the village could accommodate small scale development which would provide not only the market and affordable housing identified as meeting local needs but could also provide much needed car parking for the school and playing field.

3.0 QUESTION 4.3 DISTRIBUTION OF DEVELOPMENT: IS THE PROPOSED DISTRIBUTION OF DEVELOPMENT IN ACCORDANCE WITH THE JCS AND SUSTAINABLE DEVELOPMENT PRINCIPLES?

- 3.1 The over reliance on the two SUE's to deliver the urban concentration suggested by the JCS means that the strategy is at significant risk if these SUE's do not perform as well, or better, than any other SUE to date in England. Failure to deliver at these unprecedented rates will mean that the desired distribution in the JCS may not be achieved.
- 3.2 The way of securing the distribution of development, in accordance with the JCS, is to where possible increase the number of dwellings to be delivered on sites that are presently identified in the Part 2 Local Plan, and to identify additional sites within the more sustainable locations.

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