

Car Park, Jacksons Lane, Wellingborough

PRE-APPLICATION PLANNING COMPLIANCE STATEMENT

AUGUST 2020

Luken Beck

Car Park, Jacksons Lane, Wellingborough

Pre-application - Planning Compliance Statement

Car Park, Jacksons Lane, Wellingborough

On behalf of:



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1. Introduction

- 1.1.1 In April 2020 the site received planning permission for a residential development of 114 dwellings (85 houses, 29 apartments), and associated works (roads, car parking, landscaping and boundary treatments). The application (WP/14/00175/FUL) was originally submitted to the Council in March 2014.
- 1.1.2 Having obtained the planning permission Keepmoat Homes has undertaken the next stage in the process with the production of working and engineering drawings. This has identified a range of areas and efficiencies that can be made to improve the capacity of the site and to simultaneously secure improvements to the development of the site in planning terms.
- 1.1.3 This note supports the pre-application which includes a draft site layout and two indicative elevations which demonstrate the architectural approach Keepmoat propose for this scheme.
- 1.1.4 The purposes of this note is to provide an overview of policy requirements and compliance at this stage mindful that an application will address more technical matters by way of a detailed submission of a planning application which include the necessary updated information in respect of Transport Assessment, Flood Risk and Drainage etc. The baseline for this statement is that the site has received planning permission for 114 dwellings, is a sustainable location and one which the Council supports (through policy and recent determination) the regeneration of for housing.
- 1.1.5 The goal of making effective use of land is supported by national planning policy, as set out in this statement, and in this case an increase in unit numbers offers the potential to realise connected planning benefits.

2. Site & Surrounding Context

2.1 The Application Site

- 2.1.1 The site is located within Wellingborough Town Centre and will be familiar to officers. For this reason in this section we have focussed on recognising the constraints faced by the site rather than giving a detailed exposition of its character.
- 2.1.2 The site measures 2.29 hectares and occupies space (for the most part) behind and between development along High Street to the north east and West Street to the south west. The site does provide some frontage at either 'end' to Jackson's Lane to the north and West Street to the south. Jackson's Lane is a one way road connecting from High Street. West Street similarly is a one way route heading from Oxford Street. Derek Hooton Way leads directly into the site serving its former use as a car park. The site is mostly laid to tarmac and incidental landscaping to suit its last use.
- 2.1.3 The site is within Wellingborough's Town Centre Conservation Area. To the east along the High Street are a number of designated heritage assets including the Grade II* Wellingborough United Reformed Church.

2.2 The Surrounding Area & Adjoining Development

- 2.2.1 Mixed commercial/residential uses are found to the east along High Street and Oxford Street ranging in scale between 2-4 storey forms. To the 'rear' of the site along West Street are a row of 2 storey semi-detached houses well set up (on the east side of the street) from road level with some examples of three and four storey development.
- 2.2.2 The character of the area surrounding the site varies in the level of commercial activity but never fully becomes solely residential, with the town centre location never far from being apparent in any views into/out of the site.

2.3 Local Facilities and Accessibility

- 2.3.1 The site is very well and conveniently located with obvious connections to the town centre and local services, shops and facilities which we will not list here. The site offers typical town centre living advantage with good connections to public transport and typical limitations on parking. It is a highly sustainable site with relatively limited constraints lending it significant scope and potential.

3. Planning Background

3.1 Planning History

3.1.1 The site has a detailed history with several consents granted by the Council to redevelop this land. The following application/consent history is relevant to this proposal:

- WP/17/0714/FUL - Demolition of structure at 48 West Street to prevent ongoing vandalism and blight to the area. The plot is subject to potential redevelopment as part of High Street regeneration scheme. **Granted 15th March 2018**
- WP/15/00669/FUL - The demolition of the existing redundant and derelict structures at 17 and 18 High Street, Wellingborough **Granted 15th February 2016**
- WP/2012/0445 Redevelopment of existing car park on High Street, Wellingborough for houses, apartments, a multi storey car park and retail. Including for the demolition of some redundant structures - Amendments including an increase in number of residential units from 128 to 133. **Refused 3rd April 2013**
- WP/2010/0024 Demolition of buildings in connection with infrastructure provision on High Street and Town Centre (Application for Conservation Area). **Granted 15th March 2010**

4. Proposed Development

4.1.1 The pre-application proposals included are as follows and as compared to the consented scheme comprise the following changes;

- 121 dwellings providing a range of 1-4 bedroom accommodation; **an increase from 114.**
- A mix of houses and apartments providing 1-4 bed accommodation; **a slight increase in the proportion of houses.**
- A mix of tenures providing 30% affordable housing; **an increase from the 20% approved.**
- Predominantly 2 storey development with up to 2.5st. houses and 3st. apartments to add interest; **maintaining similar characteristics to the approved scheme.**

4.1.2 The site will continue to utilise the two main vehicular access points, from Jackson Lane to the north and Derek Hooton Way to the south. Vehicular connections are not provided in the layout, to prevent the site being used as a thoroughfare but a pedestrian footpath and cycleway does provide permeability.

4.1.3 As set out in the covering letter the scheme also carries with it some other comparative benefits. The key purposes of the revised scheme is to provide a more efficient scheme and provide a more appropriate response to the site's constraints (mainly around levels). Consequently the layout is simplified, even while providing 7 additional units and a modest (5%) increase in housing vs apartments. This is achieved with a modest increase in site density from 49.8dph to 52.8dph.

5. Planning Policy: Development Plan and National Policy Context

5.1 Introduction

5.1.1 The Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 create the plan led system. As the Local Planning Authority, Wellingborough Borough Council are required to consider planning applications with regard to the development plan and to determine it in accordance with it, unless material considerations dictate otherwise.

5.1.2 This section sets out the policy framework and considerations, including our responses, which should inform the council's consideration of this pre-application scheme.

5.2 Statutory Development Plan

5.2.1 The development plan for Wellingborough Borough Council is set out below. This remains essentially unchanged since the grant of planning permission for the site in April 2020 and comprises;

- Plan for the Borough of Wellingborough 2031 (Adopted February 2019) [LPP2]
- North Northamptonshire Joint Core Strategy 2011-2031 (Adopted July 2016) [JCS]

5.2.2 The key policies that are relevant to the determination of this outline planning application within the above are as follows:

North Northamptonshire Joint Core Strategy [JCS]

- 1 - Presumption in favour of sustainable development
- 2 - Historic environment
- 3 - Landscape character)
- 4 - Biodiversity & geodiversity
- 5 - Water environment, resources and flood risk management
- 6 - Development on brownfield land and land affected by contamination
- 8 - North Northamptonshire place shaping principles
- 9 - Sustainable buildings and allowable solutions
- 10 - Provision of infrastructure
- 11 - Network of urban & rural areas
- 12 - Town centres and town centre uses
- 16 - Connecting the network of settlements
- 28 - Housing requirements and strategic opportunities
- 29 - Distribution of new homes
- 30 - Housing mix and tenure

Plan for the Borough of Wellingborough 2031 [LPP2]

- H1- Urban housing
- H3 - Housing Needs of Older People
- H5 - Self-build and Custom Housebuilding
- TC5 - Public realm
- TC9 - High Street/Jacksons Lane

5.3 Other Material Considerations

Supplementary Guidance

5.3.1 The following additional documents are adopted by the Council and offer guidance to developers and form a material consideration in the assessment of application proposals:

- Sustainable Design SPD
- Biodiversity SPD
- Upper Nene Valley Special Protection Area SPD
- Trees and Landscape SPD
- Planning Out Crime in Northamptonshire
- Parking SPG
- Affordable Housing SPG

National Planning Policy

5.3.2 The government's aims and objectives for planning are set out by the policies within the National Planning Policy Framework (February 2019) is a significant material consideration in the determination of planning applications. The Framework confirms that the purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7). Furthermore (Paragraph 8) there are three over-arching objectives to sustainable development, namely economic, social and environmental.

5.3.3 Paragraph 10 sets out;
"So that sustainable development is pursued in a positive way, at the heart of the framework is a presumption in favour of sustainable development" which means "approving development proposals that accord with an up-to-date development plan without delay".

5.3.4 With respect to decision-making, Paragraph 38 of the NPPF advises;
"Local planning authorities should approach decisions as proposed development in a positive and creative way...use the full range of planning tools available...and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area."

5.3.5 The Framework promotes the delivery of a wide choice of homes that are high quality and enable greater opportunity of home ownership and sustainable, inclusive and mixed communities, Paragraph 59 states;

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

5.3.6 Section 11 ("Making Effective Use of Land") places great importance on the need to make efficient and effective use of land for meeting the need for housing and other uses. With regard to making effective use of land, Paragraphs 117, 118 and 123 are directly on point for the masterplanning principles to be adopted for this site. They note:

117. "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions."

123. "it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential for each site".

5.3.7 Section 12 ("Achieving well-designed places") attaches importance to the design of the built environment and advises that good design is a key aspect of sustainable development, Paragraph 127 sets out a range of criteria which decisions should seek to achieve in approving developments, while under paragraph 130 it is confirmed that poor design that fails to take up opportunities available for improving the character and quality of an area and the way it functions should be refused (taking into account local design standards and supplementary planning documents). However, paragraph 126 makes clear that such need to avoid unnecessary levels of detail and prescription and allow suitable degrees of variation.

5.3.8 National Design Guide

5.3.9 Additional guidance by government is provided within the National Design Guide. Published in October 2019 it is a material consideration though one of reduced weight at this outline stage. Paragraph 3 of the guide highlights (per the National Planning Policy Framework) that creating high quality buildings and places is fundamental to what the planning and development process should achieve.

5.3.10 The National Design Guide sets out ten different characteristics that developments should achieve to create the physical character, whilst nurturing and sustaining a sense of community and working positively to address environmental issues that are impacting the climate as specified in Paragraph 35.

6. Analysis of Policy

6.1 Principle of Development

6.1.1 The site has been hitherto identified as a key site to both provide housing and assist with the regeneration of Wellingborough town centre. The wider site was allocated within the 2009 Town Centre Action Plan, continues now to be allocated in the recently adopted Plan for the Borough of Wellingborough 2031 (H1), and has planning permission for the construction of 114 dwellings. The pre-application site, which forms part of the wider allocation (but excludes land adjacent to High Street), is necessary to the delivery of the overall spatial strategy for North Northamptonshire (set out within the JCS) and the more recent part 2 local plan.

6.1.2 Policy H1 and Policy TC9 (High St/Jacksons Lane) set out an anticipated capacity of 113 dwellings and confirm that the site should be redeveloped for a predominantly residential scheme that includes;

- A) A Heritage Impact Assessment to inform the masterplan for the site
- B) An active frontage to High Street
- C) Car parking for general public usage
- D) safeguarding of suitable access for maintenance of water and sewerage infrastructure
- E) a relatively small proportion of other town centre uses

6.1.3 The pre-application site comprises the residential development area within WP/14/00175/FUL. Other areas will provide criteria B, C and E of the above policy. For the residential development the 'anticipated dwelling capacity' within the policy's supporting text is not a limitation on the site, and para. 7.1.1 of the plan clarifies the spatial strategy accords with the urban focus of the JCS, which has seen the direction of additional housing towards the town in the first instance as this is most sustainable approach.

6.1.4 Supporting text to policy TC9 notes that as the site is largely separate from the primary shopping frontages and is ill-suited to large scale retail, residential development is preferred as it would increase the number of people living in the town centre. The supporting text also highlights the existing sewer and water main (Anglian Water) that should be taken carefully into account. It also draws relevance to JCS policy 4 as the site is within 2km of the Upper Nene Valley Gravel Pits SPA/RAMSAR.

6.1.5 Having regards to the provisions of the above mentioned policies and the goals in section 11 of the NPPF the principle of development remains acceptable, and the increase in unit numbers by 7 no. merits support in principle on this previously developed site, JCS Policy 29 also supports the re-use

6.2 Housing Provision

6.2.1 The proposed development provides a mix of residential accommodation to meet local need and demands and reflects this inner-urban area location. The scheme has paid regard to JCS policy 30 in particular.

6.2.2 The most significant change to the scheme is that despite a small increase in overall unit numbers it delivers an uplift in the percentage of affordable housing from 20% to 30%. Due also to the uplift in numbers in total this entails an increase by 13 no. homes to the previous total of 23; nearly a 60% increase.

6.2.3 The draft layout proposes the following mix of affordable housing (by size);

- 6 No. 1B apartments
- 18No. 2B apartments
- 6No. 2B houses
- 6No. 3B houses

- 6.2.4 The blended mix of housing provides a range of 1-3 bed housing including smaller and larger 2 and 3 bedroom units meeting a wider range of needs within this bracket. Only 10 (8.3%) of the 121 homes will be 4 bedroom properties and these are aimed at 5 and 6 person occupancy (so are not large family homes). This meets the mix aspirations of JCS Policy 30(a) and is appropriate in a town centre location.
- 6.2.5 In terms of internal layouts units meet Nationally Described Space Standards (NDSS) as is reflected by the draft layout. The pursuit of M4(2) and M4(3) thresholds within Part M of the Building Regulations will ensure that the development will sufficiently cater for the needs of all users, including older occupiers. 5% of properties will meet the Wheelchair Accessibility standard, while the remaining will meet the 'Accessible and Adaptable' dwelling standard. This is a significant benefit to a site as accessible as this. Consequently the proposals would be considered to meet the requirements of JCS policy 30(c, f) and LPP2 policy H3.
- 6.2.6 Keepmoat has had regard to JCS policy 30(g) and H5 of LPP2 and contends that while the site qualifies under the policy by virtue of its size, self-build/custom building would not be appropriate on this site whether there is indeed any demand or not, due to the barriers present from the range of site constraints, density and co-ordinated delivery within a confined urban space.

6.3 Place Shaping

- 6.3.1 The pre-application scheme pays close regard to the place shaping principles set out by JCS policy 8. The consented layout was already found to meet its requirements and achieves the key goals set out by the policy. That is a material consideration and the starting point in this case. However, factoring in on-site constraints including designing for levels/topography Keepmoat Homes believes there is scope for significant improvement both in terms of efficiency and quality.
- 6.3.2 Keeping in mind the scheme increases development slightly (+6%), and that it delivers a disproportionate uplift in affordable housing there are numerous improvements from the simplification of layout and arrangement of housing within the scheme. The layout holds on to? or retains? the structure of the layout (i.e. pattern of roads) and to a number of the feature plots/buildings that were already approved and retains appropriate enclosure of streets and spaces by built form and landscaping, as well as reinforcing legibility. In fact outwardly the scheme remains ostensibly similar, with the exception of the north western corner where a straightened street alignment reduces plot congestion. Access also remains the same, along with adjustments to the existing highway network.
- 6.3.3 However, within the approved layout the imbalance of outer and inner units within perimeter blocks led to too great a reliance on inner courtyard parking, small gardens, and confused emphasis on built form along shorter streets. These factors led to a more compact, less cohesive layout, with a number of tighter back land relationships between units and rather confined private amenity spaces. There are numerous instances of the latter.
- 6.3.4 The draft layout supplied promotes a stronger and more well-defined public space/streetscape with simpler and better rhythm of built form. Rear plot units (where they still feature, such as 83-85) are provided with a more incidental character that is deferent to the main 'streets'. Improvements allow for a better public and private realm to be provided. A summary of improvements made with reference to JCS policy 8 criteria include;
- The layout is more legible with a better physical hierarchy and is better at avoiding 'dead ends' (8a)
 - Streets provide more continuity of built form, reinforcing character and mimicking the simpler arrangement of streets (so responding better to local character) (8a, b, c, e)
 - The simpler arrangement responds better to site topography (8d)
 - Parking is made more logical and usable parking and spaces that have generally better surveillance (8b, e)
 - Confined private gardens are resolved and private amenity generally speaking is improved (8e)
- 6.3.5 Finally we note that the scheme maintains a quantum/ratio of parking which reflects what was previously agreed through negotiation with NCC (for the approved scheme). This includes a 1.5 car parking spaces per dwelling average across the scheme. Parking is provided in a mix of on plot, frontage parking and in small courts (though fewer than in the previous scheme) with an emphasis on spaces being well related to the plot that they serve and trying to reduce the number in a tandem arrangement.

6.4 Impacts to visual amenity, townscape character and heritage

6.4.1 Policy 2 (a), (b) and (c) of the JCS sets out the plan policy for the protection, preservation and enhancement of the historic environment. We note the site is within the Conservation Area and the presence of nearby heritage assets, but find it unlikely the proposals could be considered to have any greater effect on the significance of heritage than the approved scheme. Indeed we believe the reinforcement of the quality of the site through these proposals is likely to have a positive, or at worst neutral effect, either on heritage or on the character and appearance of the public realm when compared with the predecessor scheme. Furthermore a well-designed scheme should have a positive restorative effect compared with historic use of the site as a tarmac car park. Not all parts of a Conservation Area necessarily contribute to its significance¹ and LPAs should look for opportunities.

6.4.2 Outwardly these proposals remain very similar in scale and kind to the approved scheme for the site. The density of built form remains similar and appropriate, as does the scale of individual built form. Modest changes to the fringes of the layout are made and include;

- Units onto West Street reduce in number adjacent the access (Derek Hooton Way) to provide a stronger landscaped frontage to the site, while units.
- Plots 11-17 take on a form more consistent with the existing character of semi-detached pairs adjacent to the north
- Plots 112-121 in the north west corner follow a simplified pattern terminating with (121) a corner turning detached unit and improving all gardens for this row.
- SW and NE streets provide simplified rows of housing

6.4.3 In detailed design terms the proposals seek to adopt a dual approach to the architectural style and appearance of dwellings. First of all a traditional character area is proposed to be maintained around the parts of the site which adjoin sensitive edges. Inwardly, however, Keepmoat would like to pursue a more contemporary style/appearance, while still being founded on traditional forms. The typical elevations provided with this pre-application submission are set out below in extract with a table indicating the external finishes across each style.



Traditional style



Contemporary style

External Materials Palette

Traditional

- Grey roof tile,
- Buff/red brick
- White uPVC windows with glazing bars.
Cottage style doors with traditional canopy
- Stone heads and cills

Contemporary

- Grey roof tile,
- Red/buff brick,
- Coloured boarding, brick detailing
- Grey windows with contemporary feature surrounds,
- Contemporary style doors with GRP canopy

¹ Paragraphs 200 and 201, NPPF

6.4.4 It is considered this approach will reinforce the quality of the scheme and meet the aspirations of JCS Policy 8(d)(i) and 8(d)(ii). Overall, the scheme is argued to be compliant with JCS policies 2 (which reflects the NPPF broadly), 3 and 8 and criteria in TC9.

6.4.5 A Heritage Statement would be submitted with the any forthcoming application to address the requirement of adopted policy TC9, which we note was adopted prior to issue of the latter planning permission on this site.

6.5 Other matters

6.5.1 A planning application will include the relevant required updates to technical reports to support proposals and meet the Council's local validation requirements, including but not limited to;

- Design and Access Statement
- Planning Statement
- Transport Assessment
- Flood Risk Assessment and Drainage Strategy
- Ecological Impact Assessment
- Heritage Statement

6.5.2 While detailed discussion of the above is at this stage beyond the scope or purpose of this pre-application we note the requirements of corresponding policies and recognise the need to provide robust analysis of these factors within a planning application. At this stage with planning permission already 'in place', subject to planning conditions it should be accepted that there are not any significant hurdles to the delivery of the broad amount of housing envisaged.

7. Conclusions

- 7.1 For the purposes of supporting this pre-application scheme our assessment set out the salient policy requirements within the development plan and in national planning policy.
- 7.2 This site is in a highly sustainable location, and is previously developed land. It is part of a allocation within LPP2 for housing-led regeneration and is important to the spatial strategy for the area. While planning permission is now in place, Keepmoat has identified efficiencies and improvements that can be made and the pre-application scheme demonstrates these. Having regard to the goals set out in the 2019 NPPF significant weight should be given to securing the combination of;
- Making efficient use of land
 - Maximising affordable housing provision from the site
 - Securing a high quality, well designed and contextually sensitive scheme
- 7.3 As shown in this draft statement the scheme would meet the development plan's goals in terms of housing mix, internal space standards, and accessibility standards while maintaining commensurate parking provision within the scheme. The proposals seek to inject appropriate character 'areas' which deviate between traditional and more contemporary styles in appropriate locations.
- 7.4 The layout changes provide a simpler and more cohesive residential scheme which, for all the reasons we set out with regard to JCS policy 8, will deliver an improvement on the consented proposals.
- 7.5 Technical matters are to be resolved and addressed by way of the submission of a planning application, appropriately supported by relevant documentation, but at this stage we trust that officers will be able to confirm their support in principle and with the proposed layout and design approach shown, or otherwise raise relevant queries on the draft proposals.
- 7.6 Given the substantial support within the development plan and national planning policy, we trust the Council will be able to confirm its support in principle for these proposals along with any detailed comments on the layout or typical unit designs presented in this draft pre-application scheme.