

Debbie Kirk
Development Management Officer
T: 01933 23 1934
E: DKirk@wellingborough.gov.uk

Keepmoat Homes
950 Capability Green
Luton
Bedfordshire
LU1 3LU

Date: 22 September 2020

Your Ref:

Our Ref: PRE/20/00060/PREF

FAO James Whelan

Dear Sir

Application No: PRE/20/00060/PREF

Proposal: Residential development for 121 dwellings along with associated infrastructure and landscaping

Location: Car Park Wellingborough Borough Council, Jacksons Lane, Wellingborough, Northamptonshire

Case Officer: Debbie Kirk

I write with reference to your pre-application enquiry letter dated 3 August 2020 in relation to a residential development containing a total of 121 dwellings on the site. The scheme consists of 85 market dwellings and 36 affordable dwellings. The enquiry was accompanied by drawing numbers H51-WB-100 (typical elevation styles contemporary), H51-WB-101 (typical elevation styles traditional), 52608 Blp02 Rev B (site location plan), 8400 1783 02 (section 38 proposed street lighting layout parcel R2) and H51-WB-002 (V4) Rev B (sketch appraisal revised mix).

Consultations have been carried out and responses received from Anglian Water, Northamptonshire highways, Northamptonshire Police, Northamptonshire principal projects officer (ecology), Northamptonshire planning obligations advisor, Northamptonshire archaeological officer, principal urban designer – JPDU, senior landscape consultant -JPDU, the council's policy officer, the council's landscape officer, the council's environmental protection officers, and would comment as follows:

Conformity with the Development Plan

Section 38(6) of the Planning & Compulsory Purchase Act 2004 replaces section 54(A) of the Town & Country Planning Act 1990 and states that if regard is to be had to the development plan for the purpose of any determination under the Planning Act, the determination must be made in accordance with the plan, unless material considerations indicate otherwise:

The development plan for the purposes of this statutory provision comprises:

- The North Northamptonshire Joint Core Strategy (JCS);
- The Borough of Wellingborough Local Plan (PBW)

Relevant Adopted Policies:

North Northamptonshire Joint Core Strategy (JCS) (part 1 development plan)

- 1 (presumption in favour of sustainable development)
- 2 (historic environment)
- 3 (landscape character)
- 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 and rural areas)
- 12 (town centre and town centre uses);
- 28 (housing requirements and strategic opportunities)
- 29 (distribution of new homes)
- 30 (housing mix and tenure)

Plan for the Borough of Wellingborough (PBW) (part 2 of development plan)

- GI4 (enhancement and provision of open space)
- GI5 (enhancement and provision of sport and recreation facilities);
- H1 (urban housing allocations);
- H3 (housing needs of older people);
- H5 (self-build and custom housebuilding);
- TC1 (town centre boundary);
- TC5 (Public Realm);
- TC6 (Town Centre Car Parking);
- TC9 (High Street/Jacksons Lane)

Supplementary planning documents/guidance

- Sustainable Design
- Biodiversity
- Trees on Development Sites
- Planning Out Crime in Northamptonshire
- Parking

Conformity with the development plan and material considerations

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts, the determination must be made in accordance with the development plan unless material considerations indicate otherwise.

This proposed development is for a major development of 121 dwellings on a site within the town centre of Wellingborough, it is within the town centre boundary as defined in policy TC1 of the PBW and it is within the Wellingborough Town centre conservation area.

The site is allocated for a largely residential development in policies H1 and TC9 of the PBW, residential development on this site is therefore fully supported in principle and the proposal could therefore make a significant contribution to meeting the boroughs housing targets as set out in policies 28 and 29 of the JCS.

The principle of a residential development on the site for 114 dwellings was established through the granted of planning permission reference WP/14/00175/FUL which was issued on 8 April 2020. This planning permission has not been implemented but is still extant.

The site is within the town centre as defined in the PBW, policy 12 of the JCS supports a variety of uses in the town centre including residential development and as an allocation this site is considered acceptable in principle for providing additional residential dwellings in the town centre.

Policy TC5 of the PBW requires that proposals in the town centre are designed to meet the highest standards of access and inclusion and they should be high quality, well connected and should improve the attractiveness of the town centre. Any full application should seek to incorporate these requirements into its design and layout.

This response will therefore consider the detailed contents of this pre-application enquiry rather than the overall principle of development on the site.

Site allocation

Any full planning application would need to have regard to the requirements of the site allocation in policy TC9 of PBW, this requires development on the site to include:

- A Heritage Impact Assessment;
- An active frontage along High Street;
- Car parking for general public use;
- The safeguarding of access to water supply and drainage infrastructure;
- A relatively small proportion of other town centre uses.

It is recognised that this application only relates to part of the total site allocation boundary and as such some of the above may not apply, for example none of the proposed site would front onto the High Street other than at the access point. Any full planning application should demonstrate compliance with the above requirements for the site unless it can be demonstrated that they do not apply to this part of the allocated site.

Effect on Heritage

Policy 2 (a), (b) and (c) of the JCS seeks to conserve and where possible enhance heritage assets and the historic environment. The site is within the Wellingborough town centre conservation area and is in close proximity to several listed buildings. As such a Heritage Impact Assessment would be required as per policy TC9 of PBW above and the layout and design of the scheme should demonstrate how it would conserve or enhance the historic environment.

The development site is entirely located within Wellingborough town centre conservation area and falls within the setting of the following listed buildings:

- The Grade II* listed United Reform Church;
- The Grade II listed walls, gate piers, steps and attached gates and railings approximately 10 metres north, south and west of the United Reform Church;
- The Grade II listed 30 and 3A and wall attached to the east wall to east of number 30 High Street;
- The grade II listed 29 West Street;
- 31 West Street Grade II listed as West Street Methodist Chapel.

The development is also located in close proximity to the following non designated heritage assets, identified as;

- 8A and 8B High Street, also known as the former Drill Hall;
- 58 Oxford Street;
- 58a to 59 Oxford Street;
- 74-48 (even) West Street;
- 25-26 Jackson's Lane and the attached derelict outbuilding.

Whilst the principle of this quantum of development may cause harm, this principle has already been established in the consented scheme. However, there is potential for this development to result in a higher quality and more bespoke response to the conservation area.

The council's built heritage consultant recommends that further design advice is sought and the proposed design of the units should be better informed by the unique characteristics and defining features of the conservation area.

As part of any future detailed planning application the impact of the proposals on the above outlined heritage assets and any other identified in the process should be thoroughly assessed as required by paragraph 189 of the NPPF. The assessment of the heritage assets should inform any further proposals and inform efforts to mitigate against any harm to their significance.

Effect on Archaeology

JCS policy 2 (d) requires that where proposals would result in the unavoidable and justifiable loss of archaeological remains, provision should be made for recording and the production of a suitable archive and report.

The site lies in the centre of medieval Wellingborough. An archaeological desk based assessment was submitted with planning permission reference WP/14/00175/FUL and identified that the High Street known as 'le Brodestrete' was an important medieval street; Jackson's Lane seems to have medieval origins. Geotechnical investigation has indicated two areas of relatively deep modern made ground, in the northwest and west/central areas of the site, and it is likely that these areas have been heavily truncated. There is considered to be a high potential for survival of archaeological levels on the Jacksons Lane frontage. The potential for the rest of the site is unclear.

Elsewhere in the centre of Wellingborough the survival of archaeological remains has in many cases been better than anticipated, for example to the rear of 30 High Street where archaeological investigations in 2017 found activity of the 12th to 13th century date, as well as features which were thought by excavators to be prehistoric.

Northamptonshire archaeological officer recommended an evaluation of the site at the time of planning permission reference WP/14/00175/FUL, although a specification for trial pitting was submitted the work was not carried out. At this stage Northamptonshire archaeological officer strongly recommends that an archaeological evaluation is carried out to provide further information on the level of survival of archaeological deposits. This information provided with any application will contribute towards an assessment of the archaeological potential of the site in accordance with paragraphs 189 and 190 of the NPPF.

Northamptonshire archaeological officer can be contacted to provide a brief for the evaluation and any further advice you may require at this stage. Please contact Liz Mordue by either emailing LMordue@northamptonshire.gov.uk or by phoning 07824 351 768.

Landscape Character

Policy 3 (a), the JCS seeks to conserve and where possible enhance the character and qualities of the local landscape. Policy 3 (b) of the JCS requires that development make provision for retention and, where possible enhancement of features of landscape importance. Policy 3 (c) of the JCS requires that development safeguard and, where possible enhance important views and vistas within the development layout; Policy 3 (e) of the JCS requires that development provide appropriate landscape mitigation.

The proposed site layout plan indicates that the proposed development would result in the loss of an area of public open space containing a number of trees adjacent to 80 West Street and the northwest side of Jackson Lane. The council's landscape officer considers that the proposed scheme provide limited opportunities for replacement planting of trees and shrubs to mitigate and provide enhancements for those lost. The proposed layout is dominated by hard surfaces with few opportunities for landscaping to be incorporated into the development. For example parallel parking spaces should be in blocks of no greater than 4 to provide opportunities for landscape fingers to be provided containing shrubs and trees to soften the appearance of hard surfacing. Parking spaces should be block paved rather than tarmac.

As proposed the scheme would not conserve or enhance the character and qualities of the local landscape or provide appropriate landscape mitigation and would therefore be contrary to policy 3 (a), (b) and (e) of the JCS.

Biodiversity and Geodiversity

The JCS at policy 4 - biodiversity and geodiversity, sets out policy requirements for the protection and where possible, a net gain in biodiversity.

The site lies in close proximity to a European designated site (also commonly referred to as Natura 2000 sites), and therefore has the potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations 2017'). The application site is within 3 kilometres of the Upper Nene Valley Gravel Pits Special Protection Area which is a European site. The site is also listed as a Ramsar Site and also notified at a national level as a Site of Special Scientific Interest (SSSI).

Increased visitor access to the Upper Nene Valley Gravel Pits SPA is recognised by Natural England as a threat to the favourable condition of the site, detailed within the Site Improvement Plan for the Special Protection Area. This is underpinned by a number of studies documenting disturbance to birds from activities such as dog walking within the Special Protection Area. A report titled "*Visitor Access Study of the Upper Nene Valley Gravel Pits Special Protection Area*" has explored the expected increases in visitor numbers as a result of new development (based on interviewing over 1000 groups who visited the site), and identifies that the majority of visitors originate from within 3 kilometres of the Special Protection Area, with most visitors arriving via a short car journey.

As a result of this evidence the North Northamptonshire Joint Core Strategy has identified that mitigation is needed for new residential developments proposed within 3 kilometres of the Upper Nene Valley Gravel Pits Special Protection Area. A mitigation Strategy has been developed as a Supplementary Planning Document and identifies the required mitigation as a financial contribution of **£296.55 per new dwelling (from 1 October 2020)** within the 3 kilometres zone. This will include a contribution towards a package of Strategic Access Management and Monitoring to include fencing, screening and wardens to manage visitors within the Special Protection Area. A total contribution would be required to be paid of **£35,882**

(121 x 296.55 from 1 October 2020). This payment will be secured through a S106 legal agreement.

The mitigation strategy has now been formally adopted and can be used by developers to mitigate impacts to the Special Protection Area. Provided the contribution is made Natural England advises that there is not likely to be a significant effect to the Special Protection Area, and following this approach provides an efficient and proportionate means to demonstrate compliance with the Habitats Regulations.

Protected Species

An 'Extended Phase 1 Habitat Survey' exercise would be required to support any planning application. There may be potential for bats, reptiles, nesting birds or other protected species to be found on the site. If bats, nesting birds or other protected species are found then details of mitigation measures including any licences should be provided. Your client should refer to the Biodiversity SPD for information on how to proceed with identifying and undertaking any ecological surveys that may be needed. Please note all surveys must be done pre-determination.

If you have any queries with the above content please contact the Northamptonshire principal project officer (ecology) Heather Webb on 01604 361 210 or email HWebb@northamptonshire.gov.uk

Biodiversity Enhancements

The NPPF at chapter 15 'conserving and enhancing the natural environment' sets out government views on minimising the impacts on biodiversity, providing net gains where possible and contributing to halt the overall decline in biodiversity.

A net gain in biodiversity is also sought through Policy 4 of the JCS.

The biodiversity impacts of any proposed scheme should be fully considered and mitigation should be provided to ensure that there is no detrimental impact on surrounding biodiversity. Biodiversity enhancement on the site can be provided through appropriate design of any proposed open space, SUDs, a landscaping scheme incorporating native species the provision of opportunities for nesting bats and birds such as bird/bat boxes or bricks.

Flood Risk and Surface Water Drainage

The JCS at policy 5 sets out a raft of sub policies aimed at preventing or reducing flood risk.

The NPPF at chapter 10 sets out government views on how the planning system should take into account the risks caused by flooding. The planning practice guidance under the chapter titled 'flood risk and climate change' gives detailed advice on how planning can take account of the risks associated with flooding in the application process.

The application lies within Flood Zone 1 defined by the Technical Guide to the National Planning Policy Framework (NPPF) as having a low probability of flooding from rivers. However the proposed development may present risks of flooding on-site and/or off-site if surface water run-off is not effectively managed. Footnote 50 of paragraph 163 of the NPPF requires applicants for planning permission to submit an FRA / Drainage Strategy for all the "Major Development" (more than 1000 square metres) and paragraph 164 requires applications for minor developments to meet the requirements for site specific flood risk assessments that is

proposed in such locations. A Drainage Strategy / FRA will be vital at the time of submitting a Formal Planning application.

From the Lead Local Flood Authority's point of view, could you, in the first instance to go to their website: www.floodtoolkit.com . The Surface Water Drainage page (<http://www.floodtoolkit.com/planning/surface-water-drainage/>) and their information requirements in support of any planning application are outlined in a document entitled Local Standards and Guidance for Surface Water Drainage in Northamptonshire document: <https://www.floodtoolkit.com/wp-content/uploads/2016/08/Local-Standards-v1.1-August-2016.pdf>

On this page you will also find information on how to use the Technical Flood Advice Service, for which there is a charge. Your client will need to submit a Technical Flood Advice Request Form (<http://www.floodtoolkit.com/planning/technical-flood-advice-service/>) to detail what advice you require. After which the cost of providing this advice will be able to be determined. Following receipt of the above completed Advice Form, an officer at the Lead Local Flood Authority will contact your client to discuss the advice they want and prepare an agreement that is made up of an offer letter, a programme, and our standard terms and conditions. The programme will specify the tasks the Lead Flood Authority will carry out, giving the approximate timetable and an order of cost for advice. A rate of £84 per hour is charged, for planning advice agreements.

Design, layout, appearance and scale

JCS at policy 8 (d) (i) and (ii) describes the principles that proposed development must take into account with regards to its effect on the character and appearance of an area.

The government at paragraph 127 (a) - (d) of the revised NPPF attach great importance to the design of built development. It goes on to advise that planning decisions should ensure that development will function well and add quality of the overall area; not just for the short term but over the life time of a development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the built environment and landscape setting, while not discouraging appropriate innovation and change; establish or maintain a strong sense of place, using the arrangements of streets, space, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.

The principal urban design consultant considered that the connections across the site are poor from north to south and east to west. It was considered that a more preferable solution would be for a road to be provided from north to south linking Jacksons Lane and Oxford Street and negating the need for the provision of a turning head. This solution would enable dwellings to back onto the eastern boundary of the site and have frontages onto either side of the new access road. Dwellings on the western side of the proposed access road could then back directly onto those dwellings fronting onto Derek Hootton Way.

The principal urban design consultant considered that the proposed footway/cycleway link from the proposed new access road off Jacksons Lane and onto a driveway which linked onto Derek Hootton Way was poor. It was noted that there was no such link for pedestrians from the more southerly private drive accessed from the new roadway off Jacksons Lane. Both vehicular and pedestrians movements across the site need to be reconsidered to ensure that the site is permeable and links to existing uses and public transport routes.

The plot types are very narrow and the scheme is dominated by terraced properties. The proposed plot types are considered to be the wrong type for the site. Wider fronted dwellings should be considered. The proposed layout appears to contain a mix of urban and suburban dwelling types. A better solution could be to provide higher density elements adjacent to Oxford Street and Jackson Lane and gradually change to lower density dwellings in the central part of the site. The principal urban design consultant considered that the correct building typology would resolve some of the problems with the current layout. The principal urban design consultant agreed to provide photographic examples of the type of housing which would be developed on the site.

Detailed comments in relation to highway and crime prevention measures are set out below.

It was considered beneficial by all the officers who attended the design surgery if a Virtual Teams meeting could be set up to understand the constraints on the site and discuss changes which are required to be made to the scheme to ensure that any proposed design, layout, appearance and scale would enhance character and appearance of the area and was appropriate for a development located on the edge of a town centre. .

As proposed the design, layout, appearance and scale would detract from the character and appearance of the site immediate and wider area and would be contrary to policy 8 (d) (i) and (ii) and advise contained within paragraph 127 of the NPPF.

Noise

To ensure quality of life and safer and healthier communities the JCS at policy 8(e) (ii) requires development to respond to an area's local character and form, whilst not having an unacceptable impact on local amenity for any potential future residents or neighbouring residents.

The layout shows dwellings close to the High Street and Oxford Street, which contains a mix of town centre uses includes takeaways, restaurants and public houses and noise from traffic.

A noise mitigation report should accompany any application and should detail any mitigation measures which are to be included within the development to mitigate noise from other town centre uses and traffic noise.

Any acoustic report should be conducted by a competent person and consider the provisions of BS8233:2014, WHO Community Noise Guideline Values, and ProPG Planning and Noise for new residential development Supplementary Planning Document 2 to assess distance design and orientation.

Due to the potential impact on surrounding residential properties, the council's environmental protection officer would recommend that a site specific construction environmental management plan is submitted to and approved in writing by the council, preferably prior to any approval being granted. The plan should demonstrate the adoption and use of the best practicable means to reduce the effect of noise, vibration, dust and site lighting. The plan should include, but not be limited to:

- Procedures for maintaining good public relations including complaint management, public consultation and liaison;
- Arrangements for liaison with the Councils Environmental Protection Team.

- All works and ancillary operations which are audible at the site boundary, or at such other place as may be agreed with the Local Planning Authority, shall be carried out only between the following hours: 08:00 hours and 18:00 hours on Mondays to Fridays and 08:00 and 13:00 hours on Saturdays and; at no time on Sundays and Bank Holidays.
- Deliveries to and removal of plant, equipment, machinery and waste from the site must only take place within the permitted hours detailed above;
- Mitigation measures as defined in BS5528: Parts 1 and 2: 2009 Noise and Vibration Control on Construction and Open Sites, shall be used to minimise noise disturbance from construction works;
- Procedures for emergency deviation of the agreed working hours.
- WBC encourages all contractors to be 'Considerate Contractors' when working in the borough by being aware of the needs of neighbours and the environment.
- Control measures for dust and other air-borne pollutants. This must also take into account the need to protect any local resident who may have a particular susceptibility to air-borne pollutants.
- Measures for controlling the use of site lighting whether required for safe working or for security purposes.

Air Quality

As an authority we are looking for all development to support sustainable travel and air quality improvements as required by the NPPF. The East Midlands region is looking to minimise the cumulative impact on local air quality that ongoing development has rather than looking at significance. This is also being encouraged by DEFRA.

Due to the pre-application enquiry site's location and likely traffic generation from the development consideration should be given to mitigation of any impacts on local air quality. Paragraph 110 of the NPPF recommends that all new development should be designed in a way that could enable the charging or plugging in of ultra-low emission vehicles. This should be included within any design of a full planning application on the site.

The council's environmental protection officer recommends that consideration should be given to the provision of electric charging infrastructure, sheds for the storage of cycles, standards of gas fired boilers and consideration of alternative heat/energy sources. An air quality assessment particularly in relation to the implications on air quality due to increased levels of traffic and congestion at the junctions and from the proposed IWMP including mitigation scheme should accompany any planning application.

Housing Mix

Policy 30 (a) (i) of the JCS states that proposals provide a mix of dwelling sizes and tenures and should avoid an over-concentration of a single house type in one part of the site where it would adversely affect the character/infrastructure of the area, and should reflect the need for smaller households (1-3 bedrooms).

Policy 30 (a) (ii) of the JCS seeks to ensure there would not be an overconcentration of a single type of housing where this would adversely affect the character or infrastructure of the area.

The proposed scheme includes 6 one bed roomed, 44 two bed roomed, 61 three bed roomed and 10 four bed roomed dwellings. The proposed mix should be changed to increase the number of one bedroom dwellings identified as being need to meet the affordable housing need set out below.

The scheme includes 36 affordable dwellings consisting of 6 one bedroom apartments, 18 two bedroom apartments, 6 two bedroom dwelling houses and 6 three bedroom dwelling houses.

The council's housing development officer advises that the affordable housing mix should be changed to meet the current identified need consisting of 12 x one bed units 17 x two bed units, 5 x three bed units and 2 x four bed units.

The proposed mix of housing should be changed to ensure that a greater range of dwelling sizes are provided to meet an identified need for affordable one bedroomed unit and ensure that there is not an overconcentration of 3 bedroomed units on the site.

National Space Standards

Policy 30 (b) of the JCS seeks to ensure the internal floor area of new dwellings must meet the national space standards as a minimum to provide residents with adequate space for basic furnishings, storage and activities.

All units whether they are affordable or market housing would be expected to meet as a minimum the national space and storage standards. Any single and double bedrooms should conform with the technical requirements in relation the width and gross internal floor area of the room. A site layout plan and floor plans should demonstrate how the scheme would meet the national space standards and the technical requirements.

National Accessibility Standards

Policy 30 (c) of the JCS requires new dwellings to meet category 2 of the proposed National Accessibility Standards as a minimum and the local planning authority will negotiate a proportion (5%) of category 3 (wheel-chair access) housing based on local needs. A site layout plan showing which dwellings will be category 2 and 3 should accompany any application and the floor plans should also confirm which would be category 2 and 3 dwellings.

Affordable Housing

Policy 30 (d) seeks on private sector development of 15 or more (net) or where combined gross floor area of dwellings will 1,500 square metres in the growth towns and market towns the local planning authority will seek the provision of affordable housing in line with the following targets 30% affordable housing.

The proposed 36 affordable units rounded down from 36.3 would meet with the requirement for affordable housing.

The Strategic Housing Market Assessment (SHMA) (revised 2015) and table 9.10 of this report (page 18) identifies that the following breakdown of units is required to meet projected housing requirements 2011 – 2031:

- 1 bed (58%)
- 2 bed (10%)
- 3 bed (30%)
- Some 4+ bed (2%)

Therefore any breakdown of housing particularly affordable should follow the mix set out above.

However, whilst in general the affordable housing should take the SHMA information into account, the council also needs to consider welfare reform (including size criteria in social

housing) and current requirements of the council's housing register. On this basis the requirement will be mainly for smaller units.

Affordable Housing Mix

The housing register (20 August 2020) shows the following level of housing need in Wellingborough:

Bedsizes	Total Number	Percentage
1 bed	191	33%
2 bed	267	46%
3 bed	91	15%
4 bed	30	5%
5 bed	6	1%
	585	100%

With regards to meeting the affordable housing needs the SHMA (revised 2015) identifies that the following breakdown should be applied to meet the required tenure mix:

- 80% social rented
- 4% affordable rented
- 16% shared ownership

Paragraph 64 of the NPPF also requires 10% of the homes to be affordable home ownership.

Of the 36 proposed affordable units this would result in:

- 29 social rent units;
- 1 affordable rented units;
- 6 shared ownership units;

In respect of any proposed mix for the affordable housing the following is preferred to meet the current identified need:

- 12 x1 bed units;
- 17 x 2 bed units;
- 5 x 3 bed units;
- 2 x 4 bed units.

A S106 legal agreement would need to be drawn up requiring 30% of the dwellings to be constructed as affordable housing in accordance with policy 30 (d) of the JCS with a split based on SHMA (2015) and taking into account the housing register as outlined in the "affordable housing mix" information above. All units should achieve the Lifetime Home Standard in accordance with policy 30 (c) of the JCS and meet the National Space Standards in accordance with policy 30 (b) of the JCS.

The S106 legal agreement also should include a copy of the council's allocation policy and the standard nomination agreement which can be provided when any S106 agreement is drawn up. A local lettings plan should also be produced before any affordable units are advertised.

Specialised Housing

The PBW also seeks the delivery of specialist housing as part of new developments. Policy H3 requires that on sites of 50 or more dwellings a proportion of dwellings will be sought to specifically meet the needs of older people, the amount, type and tenure of such dwellings should take into account evidence of local need, the scale and location of the site and the viability of the development. Any full application of the size proposed would be expected to incorporate dwellings for older people in accordance with this requirement of Policy H3 of the PBW.

Custom Build Housing

Similarly, policy H5 of the PBW requires that on sites of 50 or more dwellings, 5% of the plots should be made available for self build or custom build housing again taking into account local need, the nature of development being proposed and viability. Any full application would be expected to incorporate plots for self or custom build units in accordance with Policy H5 of the PBW.

There is nothing to indicate in the submission documents that the proposed development is currently aiming to provide this type of specialist housing. Failure to provide any custom build dwellings would make the proposed development contrary to policy 30 (g) of the JCS and policies H5 and site 2 (e) of PBW.

Sustainability

Policy 9 of the JCS requires new development to meet water use standards which limit internal water use to no more than 105 litres/person/day and external water use to no more than 5 litres/person/day. Any proposed development will be conditioned to ensure compliance with the housing optional standards through requirement G2 and regulations 36 and 37 of the Building Regulations 2010 – Water Efficiency.

Effect/Impact on the Living Conditions of the Neighbouring Occupiers and the Future Occupiers of the Development

The JCS at policy 8(e)(i) details policy relating to the protection of amenity of neighbouring occupiers.

The proposed development appears to retain adequate spacing and separation distances between existing dwellings and offices. It would be helpful if front to front dimensions could be annotated on any layout plans.

Please note in relation to privacy distances - back to back spacing and separation distances of 22 metres and flank to rear spacing and separation distances of 13.7 metres should be retained between proposed dwellings across the development site.

All market and affordable dwellings should have a minimum private garden area of 100 square metres and a depth of 10 metres. Apartments should be provided either with enclosed communal gardens or balconies. A minimum area of 5 square metres per dwelling should be provided. The apartment blocks plots 28-36 and 103-111 do not have acceptable dedicated communal garden space.

The site layout plan should be amended to ensure that there is adequate spacing and separation distances between dwellings and that reasonable garden sizes are provided with each dwelling and communal gardens for apartment blocks. As proposed the development would be contrary to policy 8 (e) (i) of the JCS.

Effect on highway safety and capacity

JCS policy 8 (b) (i) gives a number of requirements that new development should achieve with regards to highway, pedestrian and other sustainable transport matters.

Any proposed development should be supported by a Transport Assessment assessing the impact of the proposal to 2031 and a framework travel plan.

The proposed layout is at variance to that which has been given the benefit of planning permission on 8 April 2020 under reference WP/14/00175/FUL.

As submitted the layout does not comply with the requirements of the local highway authority and requires revision in accordance with the 'specification and standards for highway layouts' attached to this response.

The roads serving units 37-44, 66 -71 and 83 – 88 must be designed as minor access roads with a 4.8 metre wide carriageway, 2 x 1.5 metre wide service strips (all block paved), 20 millimetre upstand and terminal turning head.

No more than four parking spaces before a minimum of one full length kerb is provided (i.e. a minimum distance of 2.7 metres between blocks of parking spaces). A number of areas of non-compliance have been noted by Northamptonshire highways.

Forward visibility is required at bends and junctions.

A 2 metre footway is required on frontage units in West Street.

The junction of Derek Hootton Way with Oxford Street and the new access road with Jacksons Lane should be at 90 degrees.

There are concerns that two straight roads are proposed without any traffic calming.

Parking

Policy 8 (b) (ii) of the JCS seeks to ensure that developments have a satisfactory means of access and provision for parking, serving and manoeuvring in accordance with adopted standards.

Parking accommodation should be provided in accordance with the Northamptonshire parking standards (2016) and satisfy policy 8 (b) (ii) of the JCS.

A one bedroom unit should provide one allocated parking space.

Two and three bedroom unit should provide two allocated parking spaces.

A four bedroom unit should provide three allocated parking spaces.

The development should include 25% unallocated visitor parking in layby's 2 metres in depth.

Visitor Parking provision is at 0.25 spaces/dwelling.

Visitor car parking is permitted within a 5.5 metres wide carriageway, subject to tracking;

Visitor Parking must not be within 10 metres from the right of a junction (on exit), or 20 metres from the left of a junction, and located in laybys.

Visitor Parking must not be within a turning head unless in the form of a layby, subject to tracking.

Visitor Parking must not block driveways.

Please note garages do not count as parking.

A parking plan would need to accompany any application. In addition one cycle parking space per bedroom should be provided. Where dwellings do not have garages sheds should be provided with each dwelling for cycle storage and a communal cycle should be provided for the maisonettes. Details of the siting, floor plans and elevations of sheds should accompany any full planning application.

The proposed parking numbers on site are well below those set out in the Northamptonshire parking standards SPD, which may result in issues relating to inappropriately parked vehicles in the street. Justification for any shortfall in parking should accompany any planning application i.e. the proximity of bus stops to the site and the station. Although the site is located within walking distance of the town centre and a public transport interchange, many people who live in Wellingborough work in Northampton and Milton Keynes. Public transport linkages to employment centres are poor. Therefore some on site parking will need to be provided.

The loss of parking for the public on the site would need to be appropriately relocated . Whilst there is capacity in the Swanspool car park to accommodate loss of parking this may not be the most appropriate location to serve the northern section of the High Street, particularly for market traders. An up to date parking study of Wellingborough Town Centre and parking layout for re-provision of public parking adjacent to the development should accompany any detailed planning application.

There may be a need for parking restrictions on West Street to ensure that vehicles can manoeuvre in and out of the proposed spaces 'on plot' on the north side of the road. This could be secured by an appropriately worded condition.

Parking spaces served off West Street the senior highway engineer would like confirmation of widths in relation to the turning to get into the spaces.

Highway planning obligations/conditions

Subject to the resolution of layout and parking considerations a number of planning conditions/S106 obligations would be required to cover the following highway and transportation elements:

Agreement and implementation of the highway access arrangements and changes to include making a section of Jacksons Lane two way and enhancements to the footway provision on Jacksons Lane and West Street. As the scheme is reliant on the success of a Traffic Regulation Order to amend the existing one way section of Jacksons Lane, there should be a Grampian style condition to ensure the success of the traffic regulation order prior to the commencement of the development;

Agreement and implementation of a construction management plan to include vehicle routing and timings;

The funding of a 4 week Rushden Lakes Megarider ticket at the cost of £89 per household upon occupation;

As proposed the layout would be contrary to policy 8 (b) (i) and (b) (ii) of the JCS.

Contamination

The JCS at policy 6 says that local planning authorities will seek to maximise the delivery of development through the re-use of suitable previously developed land within the urban areas. Where development is intended on a site known or suspected of being contaminated a remediation strategy will be required to manage the contamination. The policy goes on to inform that planning permission will be granted where it can be established that the site can safely and viably be developed with no significant impact on either future users of the development or on ground surface and waters.

The NPPF at chapter 11 sets out policies on development involving contaminated land. The planning practice guidance also offers detailed government advice on this topic.

The council's environmental protection officer (contamination) recommends a condition could be imposed on any future planning permission in relation to a detailed risk assessment and mitigation measures.

Crime Prevention

The JCS at policy 8 (e)(iv) sets out the policy requirement for new development to seek to design out crime and disorder and reduce the fear of crime. The adopted designing out crime supplementary planning guidance gives detailed advice this issue.

The NPPF seeks to promote more sustainable development by requiring an approach that is based on stated objectives for the future of the area, creating safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life is one which can ensure security is a material planning consideration.

Northamptonshire police have concerns with reference to the development in its present form and have the following comments to make. This is in the interest of the security and quality life of future occupants of the development in accordance with policy 8 (e) (iv) of the North Northamptonshire Joint Core Strategy

There are a large number of terrace dwellings within the development. There are several partnership schemes throughout Wellingborough to close-up or gate rear access alleyways due to on-going issues of crime and anti-social behavior. This should be acknowledged as a local concern and must not be designed into a new development in this location. Rear alleyways, should be avoided these can both cause issues of security and problems for the resident with refuse transportation. Where these exist residents leave their bins either on street or leaned against the house or a fence which is an arson risk; and a threat to life. The scheme should be amended to use terrace properties with an internal gated access sometimes referred to as internal Ginnels with a bedroom above. Example provided below. Keepmoat Homes have included some of these house types in a development in Corby.



Footway/Cycle path between plots 97 & 98: These plots should feel dual fronted, with bay or oriel windows. There should be some defensible space between the walkway and the path. This should not make the walkway feel narrow or constricted and should allow surveillance.

Rear and side boundary of 118-121: It would be advantageous for there to be some defensible planting behind these boundaries.

Car parking for plots 78-81: Quadruple tandem parking bays have the potential to cause neighbour disputes/conflict. The parking area are sandwiched between fences/buildings and would be sensitive to the size of vehicle and how straight the vehicle is parked. The residents will also need to shuffle cars. Treble tandem parking spaces should be avoided they are inconvenient and rely on good neighbour etiquette. This has the potential to affect the quality of life of the residents, and escalate in to prolonged neighbour disputes as well as inappropriate parking that could cause issues for emergency access.

Please note this is not a full designing out crime response due to the information provided.

Any application should be accompanied by a crime prevention statement.

Planning Obligations and Conditions

The Community Infrastructure Levy Regulations 2010 at paragraph 122 sets out limitations on the use of planning obligations under section 106 of the Town and County Planning Act 1990, as amended, to secure community benefits for a scheme. It applies where a relevant determination is made which results in planning permission being granted for development.

Planning obligations mitigate the impact of unacceptable development to make it acceptable in planning terms. A planning obligation may only constitute a reason for granting planning permission if it meets the following tests. Is the obligation:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development

In addition to the above regulations the government has recently updated its PPG with regards to planning obligations and below is summary in relation to how the salient elements of the guidance have an influence on this proposal.

The government repeatedly states in its guidance that obligations must be entirely necessary and they must be fully justified and evidenced.

Policy 10 of the JCS also requires development to be supported by the timely delivery of infrastructure services and facilities necessary to meet the needs arising from the development. In addition to the open space and sports contributions already referred to above, therefore, the development should make appropriate contributions to other infrastructure including the highway network, education and health provision.

The proposed dwelling mix for the scheme is 6x 1 bed units; 44x 2 bed units; 61x 3 bed units; 10x 4 bed units - These figures have been used to guide this response.

Education

Northamptonshire County Council has a statutory responsibility to ensure that there is a sufficiency of school places available for all children early years, primary, and secondary (including sixth form) age. When it can be demonstrated that a development would result in a deficiencies in school places contributions are required from new developments to support the extension of or improvements to existing schools or pre-schools that would serve the development, and/or the building of new education facilities.

It is expected that a scheme of this size and mix will generate approximately 36x Early Years, 29x Primary and 20 Secondary & Sixth Form age pupils requiring education provision, and therefore it is likely that a full s106 contribution will be required for this scheme based on the information provided and current capacity in the local provision. Should the scale or mix of proposed dwellings alter during the planning process, then this position will be re-assessed alongside capacity at the time of a planning application being made, and the level of obligation required may change accordingly; I have therefore included the current multipliers required per dwelling, based on current Department for Education costs, for reference:

Type of Education Provision	Size of Dwelling	1 bed	2 bed	3 bed	4+ bed
Early Years	Cost per Unit	£0	£3,724	£3,972	£4,220
Primary	Cost per Unit	£0	£1,614	£3,972	£4,592
Secondary	Cost per Unit	£0	£1,170	£4,600	£5,941

Please note the above figures will need to be reassessed once the dwelling mix is confirmed, therefore any s106 agreement should contain a formula for calculating the contributions rather than the fixed sums here.

Please note that all figures quoted above will be subject to appropriate indexation in order to ensure amounts due at the time of payment triggers being achieved accurately reflect latest build costs. The county council is happy to discuss phased payment of obligations where appropriate.

The guidance contained above may be subject to change as a result of changes to planning policy and guidance at national and / or local level as applicable, or as a result of any updates to the DfE standard cost multipliers, and therefore continued consultation with the County Council is recommended to ensure that the latest available information is taken into consideration at each stage.

Fire & Rescue

New developments generate a requirement for additional fire hydrants and/or sprinkler systems in order for fires, should they occur, to be managed. It is possible that this development may require 3 x new hydrants to be installed in order to ensure adequate water supply is available to the site. The preference of NFRS would be for these to be secured through a planning condition, with the likely position of any hydrants and water mains required to be factored into the master-planning stage. The capital cost of the hydrant and its installation (£892 per hydrant) is expected to be met by the developer.

Broadband

The Northamptonshire vision is for the county to be at the leading edge of the global digital economy. This requires new developments (both housing and commercial) to be directly served by high quality fibre networks. Access to a next generation network (speeds of >30mbs) will bring a multitude of opportunities, savings and benefits to the county. It also adds value to the development and will attract occupiers.

In order for the commercial communications market to be able to deploy to these new build areas, measures must be introduced at the earliest opportunity. This will provide the required specification to enable fibre connectivity for all new developments in respect to receiving superfast broadband services. To help developers, some fibre based broadband network providers such as BT Openreach and Virgin Media have dedicated online portals which provide assessment tools and technical help. There are also other providers may also be able to connect your development:

<http://www.superfastnorthamptonshire.net/how-we-are-delivering/Pages/telecoms-providers.aspx>

Early registration of development sites is key to making sure the people moving into your developments get a fibre based broadband service when they move in. More information can be found in the links below:

BT Openreach: <https://www.ournetwork.openreach.co.uk/property-development.aspx>

Virgin Media: <http://www.virginmedia.com/lightning/network-expansion/property-developers>

It is advised that ducting works are carried out in co-operation with the installations of standard utility works. Any works carried out should be compliant with the Manual of Contract Documents for Highway Works- specifically Volume 1 Specification Series 500 Drainage and Ducts, and Volume 3 Highway Construction Details Section 1 – I Series Underground Cable Ducts (found at <http://www.dft.gov.uk/ha/standards/mchw/index.htm>).

Further information on the project can be found here: www.superfastnorthamptonshire.net

For further information on the County Council's approach to s106 funding can be found in our adopted Planning Obligations Framework and Guidance Document 2015, which can be downloaded from the Council's website

here: <http://www3.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/Pages/managing-growth.aspx>

Open Space and Sports Provision

In accordance with policies GI4 and GI5 of the PBW, major development in the borough is required to provide contributions towards open space and sports provision. Two SPDs were

agreed on the 17th February 2020 to go to full council for adoption on 25 February 2020 which set out the methodology which is to be used to determine required contributions. An assessment of the possible open space and sports contributions of the proposed scheme is included as an appendix to this response.

NB, these calculations are based on an estimate of 284 people living on the development. $121 \times 2.35 = 284$ people. This could be altered by any detailed proposal setting out a specific mix of housing types and sizes.

Parks & Gardens, Amenity Greenspace and Linear Greenspace

Provide a contribution of £208,443 towards the ongoing maintenance of the existing good quality Park and Garden. The closest park is Bassets Park.

Natural and semi-natural greenspace

Provide Natural and Semi Natural Open Space on site. If this is not possible then a contribution of £140,682 would be required towards a project off site providing Natural and Semi Natural Greenspace.

Allotments

Provide Allotment provision on-site. If this is not possible then a contribution of £11,076 would be required towards a project off site providing Allotments.

Provision for Children and Young People

Provide a contribution of £6,802.51 towards the ongoing maintenance of an existing NEAP. Bassets Close NEAP/Bassets Park Skateboard Ramps.

Playing pitch contributions

Using the Playing Pitch calculator the following additional demand is generated by the development:

Playing Pitch Contributions

Sport	No of Pitches	Capital Cost of pitches	Total Life cycle cost per annum	Life cycle cost for 15 years	Total cost
Total =	0.33	£39,952	£7,019	£105,285	£145,237
Adult Football =	0.06	£6,229	£1,217	£18,255	£24,484
Youth Football =	0.10	£7,749	£1,507	£22,605	£30,354
Mini Soccer =	0.08	£2,285	£444	£6,660	£8,945
Rugby Union =	0.03	£4,426	£877	£13,155	£17,581
Cricket =	0.05	£15,290	£2,860	£42,900	£58,190

Sports Pitches within reasonable catchment of the development

- Redwell Leisure Centre

- Any other Hub Site

Playing Pitch Strategy identifies the following actions for the identified sites:

Redwell Leisure Centre-

Football- Improve pitch quality to increase capacity

Cricket- New pitch required helping to reduce overplay.

Sport Hall

The planning policy officer recommends that a financial contribution of £53, 566 is provided towards a project to deliver a facility to meet a borough wide need.

GP Primary Care General Medical Services

Please note, this response is based solely on GP primary care general medical services (GMS) future capacity in relation to section 106. Any response received will be sent separately

Chase up response.

Monitoring Planning Obligations

Local planning authorities can charge a monitoring fee through section 106 planning obligations, to cover the cost of monitoring and reporting on delivery of that section 106 obligation. Monitoring fees can be used to monitor and report on any type of planning obligation, for the lifetime of that obligation. A monitoring fee will be included within any S106 agreement for officer to monitor each obligation set out within any agreement.

Viability

Please note if viability is likely to be an issue with regards to the provision of affordable housing or financial contributions towards education, health facilities playing fields, open spaces etc a detailed viability assessment would need to accompany any planning application, which would be assessed by the council's appointed valuer and paid for by your client.

Statement of Community Involvement

Any submission should be supported by a statement of community involvement, with the ward councillors and local residents. Prior to the submission of any planning application a public consultation event with residents who abut or live in the vicinity of the site should be held and any comments received and changes made as a result of this event should be included within any statement of community involvement.

Conclusions

The site is an allocation in the PBW and the residential development of the site is therefore fully supported by policy TC9 of the PBW in principle and would make an important contribution to meeting the housing targets set out in Policies 28 and 29 of the JCS.

Any full application should seek to demonstrate compliance with the criteria in policy TC9 of the PBW to satisfy the requirements of the site allocation.

The housing mix for the site should have regard to the requirements for affordable housing in accordance with policy 30 (d) of the JCS and for older persons housing in accordance with

policy H3 of the PBW and self and custom build housing in accordance with Policy H5 of the PBW. Any full application should take these housing mix requirements into account.

The design and layout of the scheme needs to be amended to take into account comments provided from Northamptonshire highways, Northamptonshire police, the principal urban design consultant, the conservation consultant and the council's landscape officer and the requirements of policies 8 and 2 of the JCS in terms of its impact on the historic environment. Permeability across the site is a particular issue and the typology of housing being proposed. The parking and access should be considered as to whether it is satisfactory for the scale and type of development being proposed in accordance with policy 8 (b) ((i) and (ii) of the JCS and policy TC6 of the PBW. It would be beneficial if a Virtual Teams meeting could be held to discuss the changes required.

Any full application should be in full compliance with the National Space Standards, and category 2 of the National Accessibility Standards in accordance with policy 30 (c) of the JCS. The proposal should also meet water use standards in accordance with policy 9 of the JCS.

The proposed level of affordable housing is 30% which would meet the requirement in policy 30 (d) of the JCS. In terms of other housing mix considerations policy H3 and policy H5 would require any full application to provide housing specifically for older persons and for self-build or custom build respectively.

A proposal of this scale would be required to provide open space and sports pitch contributions in accordance with Policy GI4 and GI5 of the PBW. Open space should be designed as a fundamental part of the design concept for the scheme. Contributions to other infrastructure, services and facilities in relation to education and health facilities to meet the needs arising from the development will also be required. If viability is an issue then a viability statement will need to be submitted and assessed by a suitably qualified consultant appointed by the council.

From the comments received from consultees in relation to the proposed site layout plan, the layout clearly needs to be redesigned to address the points raised and I would suggest that a further layout plan and design meeting is held to discuss the changes made and any further considerations/changes which may need to be made to an amended a

The council would support the submission of a full planning application which is accompanied by the following documents:

- A Planning Statement
- A Design and Access Statement;
- Archaeology report;
- Heritage Assessment;
- Transport Assessment;
- A Framework Travel Plan;
- A security statement in line with the secured by design residential guidance;
- A detailed soft landscape plan and specification;
- A detailed boundary treatment plan;
- A detailed hard landscape plan;
- A Tree Survey including root protection measures;
- A phase 1 ecology survey including any relevant mitigation surveys;
- Biodiversity enhancement plan;
- Flood Risk Assessment and surface water drainage plan;

A lighting scheme for allocated and unallocated areas;
Noise assessment including any mitigation measures;
Air quality assessment including any mitigation measures;
Parking plan;
Site layout plan showing access and parking;
Existing site plan;
Plan of proposed site layout plan, floor plans and elevations;
Floor plans to show compliance with the national space standards;
Floor and site layout plans to show compliance with category 2 and 3 of the national accessibility standards;
Viability assessment if required;
Agreed heads of terms in relation to S106 planning obligations;
Statement of Community Involvement;

The advice given above is the informal opinion of an officer only and it will not fetter or bind other officers or councillors if they are called upon to make a recommendation or take a decision on any formal planning application.

In addition, the council cannot accept responsibility for any action you or your client may take as a result of receiving this advice. Furthermore, this advice has been formulated without the benefit of receiving comment from other statutory and non-statutory consultees or responses from members of the public which could result in a different recommendation to the advice given.

I hope the above advice is of assistance. I can be contacted on the above number if you require further clarification in this matter

Yours faithfully



Debbie Kirk
Senior Development Management Officer

Appendices -‘specification and standards for highway layouts’