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Chelveston-cum-Caldecott Neighbourhood Plan
c/o Chair of the Parish Council
21 Water Lane
Chelveston
Wellingborough
Northants
NN9 6AP

Our Ref: IRS/KA14353
Date: 29th January 2015

Dear Sir

Re: Chelveston Neighbourhood Development Plan: Regulation 14 Consultation

We act on behalf of Mr R Knight who owns land in the neighbourhood plan area that has been allocated for development. We wish to raise two formal responses to the draft Plan as set out below. These responses comprise one statement of support and one objection.

1. We fully support the allocation of Site NDP-S007 at Water Lane under Policy H5f. This land is highly suitable for a single dwelling. We, and the landowner, are already aware of the constraints affecting this site and believe this site could be brought forward in the short term.
2. We wish to formally object to the wording set out in Policy H5e in respect of site NDP-S006. We have a number of detailed objections in respect of Site NDP-S006 but we very much support the principle of this allocation for housing. Our objections relate to detailed matters as follows and we have suggested a revised policy wording at the end of this section:
 - a. We do not understand the basis of the approach to phasing whereby this site is earmarked for the period 2026-2035 and we are unsure as to how phasing proposals have been applied to each specific housing site. The Plan would require a clear justification as to phasing of all housing sites if phasing is really necessary. As proposed, the landowner would not be able to consider bringing this site forward for development for a further 11 years.

In our opinion there is no justification for any phasing in a Neighbourhood Plan which is proposing this level of new housing development (i.e. 37 dwellings over 20 years) and particularly not on a specific site by site basis.

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The National Planning Policy Framework (NPPF) is based on a stance of delivering housing and bringing forward a step change in housing delivery. That Government aspiration applies at all levels and across all settlements. The idea of phasing of housing does not appear in the NPPF at all.

According to the Neighbourhood Plan the phasing of this site is in accordance with CSS Policy 7. CSS Policy 7 is contained in the Core Spatial Strategy for North Northamptonshire adopted in 2008 i.e. well before the NPPF. The Core Spatial Strategy Review (CSSR) published 26/1/15 reflects the NPPF and contains no reference to housing phasing policies and so CSS7 will soon be superseded. The CSS Review indicates that East Northamptonshire will accommodate some 820 dwellings in the rural areas between 2011 and 2031 without any referencing to phasing.

There are generally two reasons for considering phasing of housing sites in development plans. Firstly to ensure supply is not exhausted in the early years of a plan and secondly to ensure the appropriate provision of essential infrastructure alongside housing provision. Within a village the provision of necessary infrastructure such as roads, schools and sewerage works is not relevant. However, we do not believe that the need to ensure supply is managed at a village scale is relevant either. Ultimately the actual delivery of housing is dependent on the market and economic interests. It is extremely unlikely, if there were no phasing policy, that all the housing sites would come forward at an early stage because the local market in a single small settlement would be swamped which would adversely affect sales values and marketing periods. In such a case market forces would themselves result in phasing of sites.

There is no justification in the Plan for a phasing policy at all or for the very specific timings that apply to each housing site. It appears to be a fairly arbitrary measure with 27 dwellings in the first 10 years of the Plan and 10 dwellings in the second half of the Plan period. It is also the case that the Neighbourhood Plan is very likely to be reviewed within 5 years and so it is an extremely prescriptive approach to phase sites in the manner proposed for a 20 year period. There may be sound reasons why particular sites do not come forward as envisaged due to physical reasons, legal constraints or a changing attitude by the relevant landowner and the Plan should acknowledge that there can be no certainty over such matters rather than being so prescriptive.

Section 5.1 states that development should be phased to allow new residents 'to be integrated effectively into the community'. It is not at all clear what this means, how it might be managed, whether it is actually a planning matter and if it can meaningfully be measured. Phasing generally is at odds with the NPPF aim of significantly boosting housing supply.

NPPF makes it clear that increasing housing land supply can lead to: a realistic prospect of achieving the planned supply, and ensuring choice and competition in the market for land. Those key principles apply in this case.

From the supporting evidence and consultation process it is clear that residents have expressed views on the merits of individual housing sites but it is not clear that any views have been expressed on the phasing of specific housing sites and hence the evidence underpinning the phasing approach appears lacking.

It is far from clear how the Sustainability Appraisal concludes that 'This site meets the criteria for sustainable development *if the development is delayed until 2025*'. The criteria make no reference to any timing factors and so the above conclusion seems unjustified in any way. It is worth noting the NPPF approach to timing which is that development which is sustainable should be approved without delay. Unjustified phasing policies simply delay development.

In the case of Site NDP-S006 our clients' preference would be to bring this site forward over a shorter timescale. In that way, wider benefits such as the possible highway improvements mentioned or affordable housing for locals for example, would be implemented at an earlier stage.

In conclusion it is considered that:

- The Plan lacks sufficient justification for any phasing and there is no basis for phasing in NPPF;
 - The phasing arrangements for specific sites appear arbitrary and unjustified;
 - There is little clear evidence to support the phasing proposals;
 - The Sustainability Appraisal reference to a delay until 2025 also appears without merit; and
 - We suggest that the phasing arrangements are deleted because the phasing restriction runs counter to the presumption in favour of development.
- b. We object to the idea of restricting the whole site to being 'dormer bungalows'. The area generally has a mix of house types, not just bungalows, and therefore it is felt that the site could also support a mix of different types and sizes of dwellings so as to encourage a range of different occupiers/households and help in accommodating a balanced resident population.

The stated reason for the dormer bungalows approach is so as to minimise the impact on the visual amenity of existing properties on Raunds Road and Sawyers Crescent. Impacts on visual amenity are dependent on a much wider range of factors in our view including landscaping, house type, materials, set back distances, ground levels, roof pitch and density for example. In addition the height of a traditional two storey dwelling may not be much greater than the maximum height of a dormer bungalow and so the effect on visual amenity may be little different. These are all detailed design matters which should not be pre-determined at this local plan stage.

NPPF specifically encourages a wide choice of homes to cater for different sections of society including size, type, tenure etc and this policy requirement runs counter to national policy in this respect and in respect of design.

In conclusion we believe that the policy criteria should be less prescriptive about the specific form of dwellings as what is more important is the overall quality of a proposed design.

- c. It is appreciated that the widening of Sawyers Crescent may be one option to alleviate parking problems but again this seems a very prescriptive approach pending further detailed assessments and we object to the wording proposed.

Pavement parking is an existing problem and there may be a number of ways this could be addressed for example the provision of off-road parking for general resident use or other traffic management arrangements. If, for example, a single point of access from Raunds Road were feasible and acceptable to the Highway Authority, then, in strict planning terms, there may be no need to widen Sawyers Crescent.

In summary, it is premature at this point in time to state that such widening will definitely be required. What will be required is a thorough assessment of options and a solution which addresses relevant highways and access issues. We suggest that Criteria ii and iii should be revised to reflect the above.

- d. We object to Criteria iv which indicates that resident parking should be wholly contained within the properties. This is a normal development control criteria reflected in County Council parking standards and there is no need to repeat such matters in a Neighbourhood Plan. Secondly the criteria refers to no parking being permitted on Raunds Road or on Sawyers Crescent from these properties. While the aim here is understood there is no legal means by which occupiers of specific residential properties can be prevented from parking on public roads and this criteria should be deleted because it is not achievable.
- e. We appreciate that it may be necessary to divert the existing public right of way and it would be helpful to understand the Parish Councils views on any future alignment. We assume that responsibility for the long term maintenance of this path will remain unchanged (it rests with the relevant landowner) and so we are uncertain why the Neighbourhood Plan touches on this? The public right of way, if diverted, will be fully considered via the appropriate statutory procedures.
- f. We object to the reference to backland development as it is not clear what this is referring to. The possible development of any further land, beyond the site allocation, would be contrary to the Neighbourhood Plan and higher level development control policies so this criteria appears unnecessary. The appropriate way to control such development is via the design of the site in any planning application.
- g. Finally, we object to the defined site capacity and we question how the capacity has been established as 'up to 8 properties'. The eventual capacity is likely to

be determined by a range of site specific constraints, opportunities and technical factors – the majority of which are unknown at this stage. Therefore the site capacity could potentially be slightly more or slightly less than 8 and the type of dwellings provided (detached, semi-detached, terraced for example) may be a major determinant of the capacity which will only be determined at a detailed site design stage.

As with some of our previous objections we believe therefore that the right approach at this stage would be one with a degree of flexibility i.e. 'approximately 8 dwellings'.

Taking all the above into account we propose the following amendment to Policy H5e – NDP-S006 – Raunds Road/Sawyers Crescent, Chelveston to make it simpler, more flexible and more relevant:

H5e – The site NDP-S006 adjacent to Raunds Road and Sawyers Crescent in Chelveston, is allocated for the development of approximately 8 dwellings with the following policy requirements:

- i. The design of the scheme should take account of the existing street scene and consider the impacts on the amenity of existing properties on Raunds Road and Sawyers Crescent;***
- ii. Access to the site will need to fully consider surrounding traffic conditions including those at peak hours and current parking concerns;***
- iii. Parking should be provided on site in accordance with NCC parking standards;***
- iv. The existing public right of way should be retained and any proposed realignment discussed with the Parish Council.***

I would be grateful if you would acknowledge safe receipt of this letter.

Yours faithfully



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