



Northamptonshire County Council

Local Strategy Service
Daventry Local Plan Part 2
Daventry District Council
Lodge Road
Daventry
NN11 4FP

Please ask for: Stacey Wylie
Tel: 01604 367064
Our ref: DDC/LocalPlanPart2Draft/Cons
Your ref:
Date: 28 September 2018

Dear Sir,

RE: Daventry District Local Plan Part 2 Proposed Submission - Regulation 19 Consultation

Submission of Northamptonshire County Council Development Management (Education)

Northamptonshire County Council's Development Management Team welcomes the opportunity to comment on the Daventry District Local Plan Part 2 Proposed Submission (the Proposed Submission) through the current consultation, supporting the development of planning policy at the local level.

The County Council's Plan for 2016-2021 sets out the vision of 'Making Northamptonshire a great place to live and work'. Northamptonshire is the largest single growth area in England outside London, with a population of more than 700,000 and set to grow by 20% by 2025.

Education Infrastructure and Facilities

1. As the Local Education Authority for the county of Northamptonshire, the County Council has a statutory responsibility for ensuring the sufficiency of provision for all pupils of school age across Early Years, Primary, Secondary and Sixth-form Education.
2. It is the County Council's role to plan, commission and organise school places in a way that promotes the raising of standards, manages supply and demand, and creates a diverse infrastructure. The County Council's 'School Organisation Plan 2016-2021 – Local Places for Local Children' (SOP) provides the framework for meeting these objectives, providing accommodation for school places that is high



quality, fit for purpose, provides value for money and ensures flexibility to respond to changes in need.

3. New housing development creates additional demand for existing and new education provision. Across Northamptonshire 80,000 additional new homes are expected to be built by 2031. These are likely to lead to approximately 24,000 additional Primary aged pupils and 16,000 Secondary and Sixth Form pupils.
4. Since 2010, the County Council has invested £230m in the schools estate in Northamptonshire; its Capital Strategy 2016-2021 identifies a further £400m of investment that is required to meet the anticipated demand for school places in the county and ensure that the County Council continues to meet its statutory obligations.

General Comments

5. The County Council welcomes the approach adopted by Daventry District Council (DDC) in preparing the Proposed Submission, and positively supports the need for collaboration between local authorities and other partner organisations, to ensure that the 'duty to co-operate' obligation is met – particularly in relation to those areas of the district allocated for development within the Northampton Related Development Area (NRDA) and allocated strategic housing sites situated at Sustainable Urban Extensions (SUEs) as set out in the adopted West Northamptonshire Joint Core Strategy.
6. The Proposed Submission clearly establishes the national and local policy context in which it will operate; in particular the need for Local Plans to be positively prepared, to meet the tests of the National Planning Policy Framework and to align with other local plans and policies.
7. The County Council remains committed to working with DDC and partners at all stages of policy-shaping to support the development and implementation of planning policy. The County Council therefore welcomes opportunities to engage with DDC to discuss these matters, and to guide the planning and development of new education facilities and infrastructure to meet the needs of proposed growth.
8. This should at all stages be underpinned by the County Council's own SOP, evidence base and strategic priorities, and informed by the '*Planning for Schools Development (2011)*' joint policy document as prepared by the Secretary of State for Education and Secretary of State for Communities and Local Government, which sets out the Government's commitments to planning and delivery of state-funded schools.

Specific Comments on the Proposed Submission

9. It is noted that the additional housing allocation sites as put forward during previous Regulation 18 consultation have been taken forward in the Proposed Submission,. This includes a new Policy H01 Daventry South West (1,100 dwellings, increased from 800), Policy H02 Micklewell Park Extension (250 dwellings), Policy H03 Land at Middlemore (100 dwellings) and Policy EC3 Land to the North and West of Daventry Town Centre (120 dwellings).
10. Collectively, it is inevitable that these additional allocations will place further pressures on existing infrastructure and as such it is expected that measures will need to be taken to address these. At present however, the Proposed Submission does not contain an up to date Infrastructure Delivery Schedule. Therefore whilst Policies H01, H02 and H03 all refer to a requirement to provide Education related infrastructure (land and/or s106 / CIL obligations) it is difficult to comment as to whether the proposed mitigations are appropriate or acceptable due to the level of detail provided. Further information is therefore required before this can be agreed.
11. Furthermore, there does not appear to be reference to the requirement to provide Education related infrastructure within Policy EC3. It is the opinion of the County Council that any major housing development (schemes of over 10 units) should be assessed on the basis of its impact on local Education infrastructure, and obligations may be secured towards mitigating this is additional capacity is deemed to be required. The Infrastructure Delivery Schedule should therefore be updated to reflect this requirement. In addition, it should be recognised in the IDS that small sites (10 units or less) may still have a cumulative impact on existing provision and capacity, and whilst s106 developer contributions cannot be secured from these schemes there should be a recognition that their impact may still need to be mitigated.

Additional comments:

12. The County Council will continue to monitor capacity and pupil generation forecasts across the existing schools estate, and assess the ability of these facilities to adapt, expand and/or enhance existing provision where possible to mitigate the impact of development. The Proposed Submission should reflect the SOP's strategic priorities for ensuring sufficiency of pupil places as a standard consideration in the assessment and determination of planning applications and in the securing of developer contributions through CIL and s106. This should be supported through further reports indicating likely profile of CIL receipts and allocations to support future education provision.

Northampton Related Development Area (NRDA)

13. The County Council recognises the significant levels of housing growth forecast for the District during the plan period, and the potential shortfall in provision of dwellings within the Northampton Related Development Area (NRDA). Sites within the Daventry District that fall within the NRDA already form a large proportion of the housing growth expected to be delivered during the plan period. It is equally recognised however that much of the impact of this housing growth will be felt by neighbouring authorities of Northampton Borough and South Northamptonshire District. This is particularly the case for Education infrastructure. As such, the County Council strongly emphasises the need for close collaboration between all the interested parties to ensure that capacity across these areas can be monitored and delivered, in order to meet the statutory obligations of the County Council to provide sufficiency of school places. This should include joint working on CIL for the NRDA. This will be of particular importance should the need arise to consider additional sites to those already allocated in the WNJCS to meet the 5 year housing supply requirements, with further consideration also being given to the potential implications of the Cambridge-Milton Keynes-Oxford growth area.

Developer Contributions – CIL and S106

14. The introduction of the Community Infrastructure Levy (CIL) by DDC in September 2015 has fundamentally altered the way in which developer contributions are secured in the district. The County Council's own 'Creating Sustainable Communities: Planning Obligations Framework and Guidance – January 2015' document (and any subsequent update) sets out the adopted approach of the County Council to requesting and securing Section 106 obligations in respect of Education infrastructure (amongst other areas).
15. It is noted that Proposed Submission states that there is an intention to update the Daventry District Infrastructure and Developer Contributions SPD (2013) upon adoption of the document. The County Council would suggest that this be reviewed and updated to reflect the latest available evidence base, including updates to the County Council's pupil forecasting methodology, to ensure that there is sufficient clarity on the approach to securing developer contributions, including the relationship between Section 106 and CIL in supporting delivery of Education infrastructure, signposting to the County Council's adopted policy where appropriate.

Concluding comments

16. The County Council welcomes the development of the Daventry District Local Plan Part 2 Proposed Submission and remains committed to working with Daventry District Council and other partners in relation to the sustainable delivery of schools

provision, including: the Education, Funding and Skills Agency, Free Schools, Academy Trusts, existing schools, education providers, developers and local communities.

17. Continued engagement is welcomed with Daventry District Council, particularly as the Proposed Submission is progressed and as the County Council's adopted Planning Obligations Framework and Guidance (2015) document is updated. This will ensure that current priorities and policies of the County Council and DDC are aligned in relation to the planning and delivery of new education infrastructure and the ability to secure appropriate developer contributions through Section 106 and CIL to effectively mitigate the impact of development.
18. This collaborative approach will help to ensure that appropriate infrastructure is provided which will meet the demands of anticipated growth, creating new and expanded schools which will serve local children and be a focus for communities for the future.
19. I hope that the above comments are helpful in shaping Daventry District's Local Plan Part 2; please do not hesitate to contact me should you have any queries regarding this response.

Yours sincerely,



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