

**SETTLEMENTS AND COUNTRYSIDE LOCAL PLAN FOR DAVENTRY  
DISTRICT (LOCAL PLAN PART 2) EXAMINATION**

**HEARING STATEMENT - MATTER 2**

**SPATIAL STRATEGY**

On behalf of:  
**Representor ID: PS082**  
**Manor Oak Homes**

Date:  
**May 2019**

Reference:  
**04718/LPP2 Examination Matter 2**

## 1.0 Introduction

- 1.1 This statement is prepared on behalf of Manor Oak Homes in relation to **Matter 2 – Spatial Strategy (Issue 1)** and provides the Company's response to **Questions 1, 3, 4, 5 and 6** raised by the Inspector.

## 2.0 Response to the Inspector's Questions

**Question 1: What is the context provided by the JCS in terms of overall scale of development required? What are the specific requirements for housing, employment, town centres etc? Is the scale of development proposed in the Plan consistent with this?**

- 2.1 The Local Plan Part 2 (LPP2) is being produced as the second part of Daventry's development plan, complementing and adding detail to the West Northamptonshire Joint Core Strategy<sup>1</sup> (WNJCS) adopted in December 2014. The WNJCS identified both the development targets for the District up to 2029 whilst also allocating a variety of strategic sites intended to meet the bulk of the Plan's housing need. Specifically, Policy S3 of the WNJCS identified a requirement for 4,620 homes to be delivered at Daventry town by 2029. The WNJCS requires exactly 4,000 of these homes are to be delivered at a single strategic allocation included in the WNJCS, on land to the North East of Daventry, with the residual 620 home requirement to be delivered by way of windfall sites and smaller allocations in the LPP2.
- 2.2 Since the publication of the WNJCS the delivery of the homes required at Daventry town has stalled, resulting in a deficit in supply. The LPP2 recognises this and seeks to allocate additional sites to make good this undersupply over the remainder of the plan period until 2029. On this basis the scale of development proposed in the Plan is consistent with the WNJCS requirement. Where our client's main concern lies is in respect of the Council's estimated rates of delivery on both the WNJCS and LPP2 allocations prior to 2029 – it is our estimation that the expected supply from these sites has been overestimated to the extent that the LPP2 will once again fall around 1,000 homes short of the WNJCS targets. This is a matter that should properly be addressed now and certainly cannot be avoided when the review of the WNJCS begins.

**Question 3: Is the principle of focusing growth and allocations at Daventry Town and the proposed settlement hierarchy as identified in the Plan consistent with the JCS?**

- 2.3 Yes. Policies S2 and S3 of the WNJCS identify Daventry as one of the principal locations for growth across West Northamptonshire. It is the second largest town in the plan area and is required by the WNJCS to

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<sup>1</sup> Document WNJCS01

identify approximately two thirds of the District's growth (4,620 of 6,980 homes) excluding that apportioned to the Northampton Related Development Area (NRDA).

- 2.4 Since the adoption of the WNJCS there has been little issue in respect of the delivery of homes across the District's rural area – the 2,360 dwellings apportioned to the District's network of villages by the WNJCS were delivered as long ago as 2017. It is at the urban area where growth has been slow. For the LPP2 to do anything other than redouble the original intent of the WNJCS to deliver a substantial proportion of the District's homes at Daventry town would result in an overburdening of the rural area and a clear conflict with the spatial strategy for West Northamptonshire as a whole.

**Question 4: Does the Plan include sufficient flexibility and contingencies to take account of unexpected changes in circumstance, including the review of the JCS?**

- 2.5 No. Our client's principal concerns relate to the way in which the Plan would fail to either support additional sustainable growth to meet the currently critical needs of the NRDA or offer a strategy that is capable of embracing an expected significant uplift in both housing and employment targets emerging from the proposed West Northamptonshire Growth Deal.
- 2.6 As worded the Plan seeks to do the bare minimum to bolster the chances of the faltering WNJCS to meet its growth targets for the District prior to 2029. It does so through the continued reliance on the ability of the Sustainable Urban Extension (SUE) to the north east of the town, an allocation that does not yet have any form of planning consent, to deliver 1,400 homes (140 homes per year from now onwards) prior to 2029. It complements this principally through the allocation of an additional strategic site to the south west of the town (Site HO1) that, whilst likely deliverable, will not yield the 1,100-home expected of it prior to 2029 (please refer to our client's October 2018 response to the Submission Consultation).
- 2.7 Even if both the North East Daventry SUE and Site HO1 deliver the 2,500 homes expected between them by 2029 this would merely allow the LPP2 to make up for the shortfall of delivery set against the WNJCS targets for the District. To this end the LPP2 provides no contingency for the expected continued slow delivery across the NRDA that will further exacerbate both housing need and resultant affordability across the District. To this end the Plan fails to grasp an opportunity to boost significantly the supply of housing, in conflict with paragraph 47 of the NPPF and avoids planning positively for the development and infrastructure required in the area in conflict with paragraph 157 of the same.
- 2.8 This issue will be brought into sharper focus in the highly likely event that a Growth Deal for West Northamptonshire is completed prior to the completion of the review of the WNJCS. It is expected that any Growth Deal will require a 50% uplift in the number of new homes required across the partner authorities (Daventry, South Northamptonshire and Northampton) prior to 2050. The review of the WNJCS is currently anticipated to take three years – based on the October 2018 Local Development

Scheme adoption is expected in January 2022. In the event of any delay in adoption – the current WNJCS took seven years to produce – the lack of contingency (including additional sites) within the draft LPP2 is likely to result in the need to deliver a significant increase in growth across the District without the benefit of a sound policy base upon which to do so. At the very least it is incumbent upon Daventry and the other partner authorities to ensure that the WNJCS is produced at a significant pace.

**Question 5: How does the Plan intend to “assist the delivery of plan-led development to meet Northampton’s needs where it is identified that this cannot be accommodated within the NRDA” as set out in Policy SP1? What is the current position in this respect?**

**Question 6: Would the approach to green wedges influence the ability to meet the JCS housing requirement, including in circumstances where the requirement may be subject to a forthcoming review outside of this Plan?**

- 2.9 Due to the way in which these issues relate to one another we have taken these questions together.
- 2.10 It is welcome that the second principle of draft Policy SP1 seeks to assist the delivery of plan-led development to meet Northampton’s needs where it is identified that this cannot be accommodated within the NRDA. However, as set out in our client’s 5<sup>th</sup> October 2018 response to the Submission Draft Plan<sup>2</sup> it is our view that the Plan does little to ensure that this objective is met. In fact, through a combination of the Council’s failure to include additional contingency allocations at Daventry town allied with the designation of much of the Northampton fringe as protected green space (Policy ENV3) the Plan will likely exacerbate issues relating to the needs of the NRDA.
- 2.11 The most recent housing supply position in respect of the NRDA was published by Northampton Borough Council in April 2018. At this point it showed a shortfall in supply, derived from the period between 2010 and 2018, of some 2,175 dwellings against the WNJCS target. More concerningly it only showed a supply moving forward sufficient to meet the needs of the next 2.59 years and demonstrated that, at the point of the publication of the statement, only 210 homes (only two more dwellings than the 2017 position, set out in our client’s response to the Submission Draft Plan) had been completed across the NRDA’s nine main strategic sites which boast a combined capacity of 17,650 homes.
- 2.12 In this respect, the way in which the Plan not only seeks to accommodate the shortfall at Daventry town but also identify opportunities to aid delivery of NRDA targets is critical. The same issue was considered at great length by Officers of South Northamptonshire Council (SNC), the comments of whom in response to the Regulation 18 consultation are set out in our client’s previous response. Tellingly SNC make it clear in their own Submission Draft Plan, now at examination, that they are supportive of sustainable

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<sup>2</sup> Representation ID PS082/01

development intended to meet the needs of the NRDA, pointing towards Policy S4 of the WNJCS as a basis for considering exceptional sites to come forward.

- 2.13 From the intent of Policy ENV3 of the draft LPP2 it is clear that the Council places great importance on preserving the character of the fringes of the NRDA – it is of course in the gift of the Council to balance this as one of its Plan’s priorities. The designation of the fringe of the NRDA as protected green space does, however, effectively ‘lock down’ land on the edge of Northamptonshire and removes it as a location suitable for development that will help alleviate housing pressures at the town.
- 2.14 If the protection of the fringe of the NRDA is supported, then the only realistic alternative to ensure that the Plan follows through on the objectives of Policy SP1 must be through the allocation of a series of deliverable and sustainably located housing sites of scale well-connected to the Northampton urban area by existing transport infrastructure.
- 2.15 Suitable additional sites should primarily comprise sustainable extensions to Daventry town, most appropriately on its more accessible South Eastern and Western flanks where highways access is greatest. It may also include a series of smaller sites adjacent to the most sustainable villages of the District closest to the NRDA fringe. These do not necessarily need to comprise immediately deliverable allocations – the option to identify a number of reserve sites exists to the Council. But additional sites are required.
- 2.16 Without addressing either the restrictive effect of Policy ENV3 or identifying additional development sites to help facilitate the needs of the NRDA the Plan cannot be considered sound as its strategy is neither effective or justified.

### **3.0 Conclusions and Proposed Changes**

#### **Conclusions on soundness**

- 3.1 We consider the spatial strategy of the LPP2 described by Policy SP1 to be unsound on the following grounds:

#### ***Positively Prepared:***

- The LPP2 does not comprise a suite of complementary policies that as a minimum allow it to help meet the objectively assessed need for Daventry District set out in the WNJCS – insufficient deliverable sites have been identified to ensure that the full needs described by the Part 1 Local Plan can be met in the plan period. Our client’s concern is that the homes required simply will not be delivered prior to 2029; and

- In addition, the Plan does not positively contribute towards the needs the NRDA. This is as a result of the inclusion of restrictive policies within the plan and a lack of suitable deliverable allocations that would ensure the provision of suitable levels of housing over the plan period.

***Effective:***

- For Policy SP1 to be effective in assisting meeting both the needs of Daventry town and the NRDA likely both of the measures described in this statement – allocations and a review of the role of the green wedges – must be employed in the LPP2. Currently the spatial strategy of the LPP2 is not considered effective in delivering the localised needs of Daventry town, let alone contributing towards the wider needs of Northampton; and
- The LPP2 fails to effectively deal with cross-boundary strategic matters. Indeed, these matters have instead been deferred to some later date, a move that will see the spatial strategy likely conflict with the emerging WNJCS in the near future, a plan that will inevitably have to accommodate a significant uplift in growth in the District.

**Changes Proposed**

- 3.2 We support the intent of Policy SP1 and recommend that it is retained in its current wording. However, to make it sound it must be supported by a number of additional complementary policies, including potential additional policies allocating sufficient sites across the District that will enable both the objectively assessed needs of Daventry and the wider needs of the NRDA to be met.