

## Daventry Settlements and Countryside Local Plan (Part 2) Examination Inspector's Matters, Issues and Questions (MIQs)

### Matters 2 – Spatial Strategy

### Hearing Statement on Behalf of Davidsons Developments Ltd and Christopher Beavan & Catherine Ball

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#### Inspector's Matters, Issues and Questions (MIQs)

#### Matter 2 – Spatial Strategy

**Issue 1: Whether the Plan is consistent with the West Northamptonshire Joint Core Strategy Local Plan (Part 1) (JCS) and whether it has been positively prepared, is justified, effective and consistent with national policy in relation to the scale and distribution of development proposed.**

#### Questions

- 1. What is the context provided by the JCS in terms of the 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?**

The West Northamptonshire Joint Core Strategy Local Plan (Part 1) ("JCS") was adopted on 15<sup>th</sup> December 2014 by Daventry District, Northampton Borough and South Northamptonshire District.

Policy S3 'Scale and Distribution of Housing Development' identifies the overall scale of development which is provision for about 42,620 net additional dwellings in the plan area during the plan period 2011 to 2029.

Policy S3 of the JCS identifies provision for about 12,730 dwellings for Daventry District from the overall scale of development in the plan area over the plan period.

We note that the Part 2 Local Plan, at paragraph 2.3.02, states that *"in the period 1<sup>st</sup> April 2011 to 31<sup>st</sup> March 2017, 1,933 dwellings were completed across the District (including Daventry town). This level of delivery has exceeded the requirement of the WNJCS for that period by 149 dwellings. Over the same period, 469 affordable dwellings have been completed within the District. This equates to 24% of the overall housing stock delivered and 31% of the WNJCS affordable requirement."*

Table 4: 'Existing Commitments and Proposed Allocations at Daventry Town (Housing)' identifies a sub-total of 753 dwellings completed at Daventry town and a remaining capacity to 2029 as at 1<sup>st</sup> April 2018 of 2,601 dwellings. The total existing commitments for Daventry town is identified as 3,354 dwellings.

We note that the Council consider, at paragraph 5.1.02, that the requirement for the rural areas has been exceeded, as at 1<sup>st</sup> April 2017 by 520 dwellings with 12 years of the plan period remaining, as identified in the Housing Land Availability Report (April 2018).

The scale of development proposed in the Part 2 Local Plan is set out at Table 4. The total proposed allocations in the Part 2 Local Plan are as follows:

- HO1 – Daventry South West = 1,100 dwellings.
- HO2 – Daventry Micklewell Park Extension = 250 dwellings.
- HO4 – Daventry Land at Middlemore = 100 dwellings.
- EC3 – Land to the North and West of Daventry town centre = 120 dwellings.

The total scale of development proposed equates to 1,570 dwellings, all of which are at Daventry town. No scale of development through residential allocations are proposed in the Part 2 Local Plan for the rural areas or the NRDA.

Despite the existing commitments identified by the Council at Daventry town and requirements for the rural area being met, we have concerns with the overall delivery of housing stock across Daventry District. We consider that 24% of the overall housing stock delivered in the period 1<sup>st</sup> April 2011 to 31<sup>st</sup> March 2017 (6 years) is significantly low. This is less than a quarter of housing delivery which has been delivered over a time-frame of 1/3 of the plan period. This would leave 76% of the overall housing stock to be delivered over the remaining 2/3 of the plan period. We would therefore seek to question whether the scale of development proposed in the Part 2 Local Plan is sufficient given the low delivery of the overall housing stock.

**2. What is the overall spatial strategy for Daventry District and the approach of the JCS towards the distribution of development within Daventry Town, Rural Areas and the Northampton Related Development Area (NRDA)? Is the Plan consistent with this?**

Policy S3 of the JCS provides a further breakdown of the distribution of housing development within Daventry District as follows:

- Daventry Town = about 4,620 dwellings.
- Daventry Rural Areas = about 2,360 dwellings.
- Northampton Related Development Area (NRDA) = about 5,750 dwellings.

We note that the Council consider, at paragraph 4.1.05 of the Part 2 Local Plan, that it is crucial that the over-arching spatial strategy of the WNCJCS is carried forward, and that with respect to the NRDA, it is important that Northampton's needs are met in a plan-led manner to avoid piecemeal development. A pattern of piecemeal development in the District is not considered to be sustainable as this can increase the load on the current road and utilities infrastructure, without bringing forward the economies of scale that would make the provision of further infrastructure cost effective and therefore deliverable.

Policy SP1 'Daventry District Spatial Strategy' of the Part 2 Local Plan states that to ensure a sustainable pattern of development to meet the overall spatial strategy of the JCS, sustainable development in Daventry District will be guided by the spatial principles as set out under Policy SP1. This includes: A) focusing development at Daventry town to deliver its regeneration and reinforce its role as the sub-regional centre of West Northamptonshire and its ability to support the surrounding communities; and B) assisting with the delivery of plan-led development to meet Northampton's needs where it is identified that this cannot be accommodated within the Northampton Related Development Area.

We acknowledge that the JCS is the key driver to identifying the scale and distribution of housing development for West Northamptonshire including Daventry District. However, we are concerned that Policy SP1 of the Part 2 Local Plan restricts necessary housing growth in Daventry District's rural area.

At paragraph 5.1.03 of the Part 2 Local Plan, the Council consider that the housing requirement for the District's rural area has been exceeded by 520 dwellings as at 1<sup>st</sup> April 2017. We also note that in the more recent Housing Land Availability Reports: the 2018 report states that the requirement for the rural areas has been exceeded, as at 1<sup>st</sup> April 2018 by 613 dwellings with 11 years of the plan period remaining; and the 2019 report state that this has been exceeded, as at 1<sup>st</sup> April 2019 by 630 dwellings with 10 years of the plan period remaining. The Council consider that, following the grant of planning consent for a number of sites, the housing land supply position has improved significantly and they can

demonstrate a land supply in excess of 5 years (6.8 years as at 1<sup>st</sup> April 2019 in the 2019 Housing Land Availability report).

At paragraph 5.1.04 of the Part 2 Local Plan, the Council consider that if there was to be a continued focus on the rural areas rather than Daventry town under the current spatial distribution of permissions, this approach would significantly undermine the spatial strategy of the JCS. Therefore, managing any further development in the rural areas is clearly an important issue. Further to this, the Council therefore consider at paragraph 5.1.05 of the Part 2 Local Plan that it is not necessary to make any allocation for development in the rural areas in this plan or to identify specific targets for individual settlements. However, further allocations could come forward through neighbourhood development plans or exception sites.

We consider that the Council cannot simply assert that further allocations could come forward through neighbourhood development plans or exception sites without this undermining the spatial strategy in the JCS. Furthermore, the Council have not indicated the number of dwellings that could come forward under Neighbourhood Plan allocations and/or exception sites in the rural area and the specific settlements to which the amount of growth will be directed through these Neighbourhood Plan allocations and/or exception sites. The focus towards additional housing growth at Daventry town and no growth in the rural area means that there will be far less of an incentive for Neighbourhood Plans to be prepared and therefore, reliance on further residential allocations coming forward through Neighbourhood Plans is totally unrealistic.

We have concerns with the Part 2 Local Plan in terms of the principle focus of growth and allocations at Daventry Town and are concerned that the Plan does not allow for sufficient flexibility and contingencies, including the review of the JCS. This is discussed below at points 3 and 4.

### **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?**

The Part 2 Local Plan identifies Daventry town as the focus for housing growth within the District as a sub-regional centre across West Northamptonshire. Policy S3 of the JCS identifies the need to deliver about 12,730 dwellings in Daventry District (during the period 2011 to 2029) and that Daventry town will deliver about 4,620 dwellings from this requirement. The Council consider that as at 1<sup>st</sup> April 2019, a total of 3,245 dwellings had been delivered against the JCS requirement of 2,345 dwellings for the period between 2011-2019, as shown in the Council's Housing Land Availability report as at 1<sup>st</sup> April 2019. However, the majority of this has been delivered in the rural areas.

The Part 2 Local Plan sets out the current position in terms of delivery for the main sites in Daventry town. We note the Council acknowledge that the Daventry North East Sustainable Urban Extension (SUE) allocation in the WNJCS is unlikely to deliver 2,600 dwellings as envisaged over the plan period and this has been revised to 1,400 dwellings as set out in the 2018 Housing Land Availability report. Furthermore, it should be noted that the 2019 Housing Land Availability report has revised the figure down further to 1,230 dwellings. The Council identified a residual requirement of 511 dwellings to be allocated in the Part 2 Local Plan. However, taking into account the slippage in delivery of Daventry North East SUE, and other updates, this requirement has now increased as stated at paragraph 6.1.09 of the Part 2 Local Plan.

Table 4 of the Part 2 Local Plan identifies the existing commitments for Daventry town as 3,314 dwellings and remaining requirement as 1,266 dwellings (as at 1<sup>st</sup> April 2018). Table 4 identifies proposed allocations for 1,570 dwellings, which equates to 304 dwellings supply in excess of WNJCS requirement as of 1<sup>st</sup> April 2018.

We object to the Council's approach to only allocating additional housing growth in Daventry town in order to meet the District's housing needs. Allocating additional housing growth through large allocations at Daventry at other parts of the town is unlikely to help meet the District's shortfall in the short-term. It is likely that these allocations will be reliant on significant infrastructure coming forward in order for them to be delivered. It is therefore not a sustainable approach to identify additional housing growth over and above the Daventry North East SUE.

An alternative approach to meeting the District's short-term housing need must be taken. We note that there are other local planning authorities, for example Rushcliffe Borough Council, who have recently submitted a Part 2 Local Plan have identified additional growth beyond the adopted Part 1 Local Plan (Core Strategy) at other sustainable settlements. This is because the strategic allocations at key settlements are not delivering the housing growth originally anticipated under the Core Strategy. Under Policy SP1 of the Part 2 Local Plan and Policy S3 of the JCS, a figure of about 2,360 dwellings is identified for Daventry Rural Areas. This is not a ceiling figure and the Council is able to allocate further housing growth at Daventry Rural Areas, similarly to the approach taken by Rushcliffe Borough Council.

The Council should allocate smaller, more deliverable sites in the District under the Part 2 Local Plan as this will help resolve housing need and delivery in the short-term. Smaller sites in sustainable villages in the rural area should be allocated for development as they are much less reliant on significant infrastructure and will contribute towards continued housing delivery across the District as a whole and ensuring the Council can maintain a five-year housing land supply position prior to the adoption of the West Northamptonshire Strategic Plan. Housing allocations in the rural area assist with sustaining rural amenities and services, which is increasingly important for settlements that have an ageing and/or declining population.

We reiterate that the approach taken by the Council to identifying additional housing growth at Daventry town and no housing at the District's rural area is not a positive approach to plan-making based on a strategy which seeks to meet the objectively assessed need of the JCS, is not justified by a robust evidence base and is inconsistent with the requirements of the NPPF.

#### **4. Does the Plan include sufficient flexibility and contingencies to take account of unexpected changes in circumstances, including the review of the JCS?**

The housing requirements and the Objectively Assessed Need (OAN) set out in the JCS are underpinned by the West Northamptonshire Strategic Housing Market Assessment (SHMA) 2009 (Report of Study Findings, May 2010) prepared by Opinion Research Services. The housing requirements and OAN in the SHMA are based on the East Midlands Regional Plan (RSS) published March 2009. The RSS was revoked by the Secretary of State on 20<sup>th</sup> March 2013.

The JCS was adopted in December 2014. The OAN identified in the WNJCS is not a maximum figure. Furthermore, a condition of the JCS being found sound by the Examination Inspector was that a review should be undertaken and the plan be adopted by 2020. This will need to be underpinned by a review of the technical evidence including a review of the OAN for West Northamptonshire. At the time of writing, the papers for the DDC Strategy Group held on 13<sup>th</sup> September 2018 sought agreement to the statement of common ground, Local Development Scheme and memorandum of cooperation for the proposed arrangements in respect of the West Northamptonshire Strategic Plan. The proposed timescales were identified as follows: Reg 18 consultation due April 2018 and September 2019, Reg 19 due December 2020, submission to SoS in April 2021, Examination in Public from September 2021 and adoption of the plan in January 2022.

The Housing White Paper (published 7<sup>th</sup> February 2017) set out how the Government will deliver their 2015 commitment of a million new homes by 2020, and want to supply a further half a million by 2022. It is also relevant to note that the Government's 'Planning for the right homes in the right place' consultation (published 14<sup>th</sup> September 2017) identified indicative assessment of housing need based on the proposed standard methodology from the current local assessment of housing need. The measures in this consultation will help ensure that local authorities plan for the right homes in the right places through up-to-date Local Plans. The Government's consultation sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. The housing need for West Northamptonshire authorities based on the standard methodology would need to be considered as part of the preparation of the West Northamptonshire Strategic Plan. The Government's consultation sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth.

The housing provision in the JCS is based on an evidence base that has been revoked under the RSS and the OAN is fast approaching its “sell-by date”. One can deduce that the OAN contained within the JCS should be considered out-of-date by December 2019, which is five-years from adoption of the plan (less than two years from now). Whilst the Council consider that they have exceeded the JCS housing requirements by 630 dwellings (as at 1<sup>st</sup> April 2019) with 10 years of the plan period remaining, the reality is such that the Council should, jointly with the other West Northamptonshire authorities, begin a review of the strategic policies for West Northamptonshire now to allow sufficient time for the review, preparation of a new plan and then adoption by 2020. It is clear however from the DDC Strategy Group held on 13<sup>th</sup> September 2018 that adoption of the plan is not likely to be until January 2022. This could mean a gap of approximately two years whereby the strategic policies in the WNCJCS are out-of-date until the West Northamptonshire Strategic Plan is adopted.

Paragraph 73 of the NPPF requires “Local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.”

As the strategic policies within the JCS including those in relation to housing will be more than five years old by December 2019, Daventry District Council as well as the other West Northamptonshire authorities of South Northamptonshire and Northampton Borough will need to use their Local Housing Need figure for the purpose of identifying sufficient five years’ worth of housing in the context of paragraph 73.

We have set out details of the housing requirements for the West Northamptonshire authorities in the table below.

	Current Adopted Target (dwellings per annum)	Current LHN (dwellings per annum)	LHN in December 2019 (dwellings per annum)
Daventry	389	372	372
Northampton	1,048	1,333	1,333
South Northamptonshire	351	491	516
<b>West Northants Total</b>	<b>1,788</b>	<b>2,197</b>	<b>2,221</b>

Whilst the figures show a slightly lower LHN figure for Daventry town against the current adopted target in the JCS, Northampton Borough is 27% higher and, by December 2019 due to changes in how the cap is calculated when a Plan is more than 5 years old, South Northamptonshire’s will be 47% higher. Overall, the LHN in December 2019 for West Northants will be 24% higher.

With South Northamptonshire identifying such a significant increase, it seems inevitable that Daventry District will bear the brunt of Northampton Borough’s unmet needs. These will all however be matters to be dealt with through strategic plan-making (i.e. a review of the JCS) not five-year housing land supply which would be calculated for each local planning authority.

If the Part 2 Local Plan becomes adopted, it will need to be considered against the 2019 NPPF with the adopted JCS having less weight due to being more than five years old from December 2019 onwards. The Part 2 Local Plan would then be considered to be inconsistent with the NPPF by virtue of its lack of small sites (paragraph 68 of the 2019 NPPF) and failure to promote sustainable development in rural areas through rural housing (paragraphs 77-79 of the 2019 NPPF). Since the Part 2 Local Plan will be silent on these issues, it is inevitable that the Plan will be deemed out-of-date and those policies restricting development in those areas should be given less weight.

We consider that if the Part 2 Local Plan is to have any longevity, the Plans needs to recognise the changes being brought about by the 2019 NPPF and implement them where they would not conflict with the 2012 NPPF.

We consider that the approach taken by the Council to identifying additional housing growth at Daventry town and no housing at the District's rural area is not a positive approach to plan-making based on a strategy which seeks to meet the objectively assessed need of the JCS, is not justified by a robust evidence base and is inconsistent with the requirements of the 2019 NPPF.

We consider that the Council should take a more proactive approach to identifying additional housing in the Part 2 Local Plan based on potential additional housing need from more up-to-date evidence base that will underpin the preparation of the West Northamptonshire Strategic Plan. The Council should seek to identify additional housing allocation in the in the District's rural area through the Part 2 Local Plan. This includes identifying the amount of growth specific to individual settlements within the rural area. A more positive approach will help to ensure continued housing delivery and a five-year housing land supply position is maintained as the Council progress towards the preparation of the West Northamptonshire Strategic Plan. Smaller, more deliverable sites in the District's rural area should be allocated for housing as they can meet housing need and delivery in the short term. These smaller sites are much less reliant (than larger sites) on significant infrastructure in order for them to come forward. The Part 2 Local Plan as drafted does not provide flexibility in the development strategy and we consider that the approach to identifying growth in the rural area (e.g. no growth) should be adjusted accordingly.

Residential allocations in sustainable settlements in the rural area of the District such as Brixworth will contribute towards the Council's current or future housing requirements. Sites can be developed within the forthcoming five-year period, which will contribute significantly towards maintaining a rolling 5-year supply of suitable housing sites throughout the remainder of the plan period and moving forward towards a review of the JCS. Residential allocations will assist with sustaining the local amenities and services of rural villages. Otherwise, there is a risk that no further residential development at rural villages will jeopardise the viability of existing amenities and services, which could result in less sustainable villages.

In view of the above, we consider that the Part 2 Local Plan does not include sufficient flexibility and contingencies to take account of unexpected changes in circumstances, including the review of the JCS and inconsistencies with the 2019 NPPF.

**5. How does the Plan intend to “assist with 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 that respect?**

For the reasons discussed above at point 4, the Part 2 Local Plan does not assist with the delivery of a plan-led development to meet Northampton's needs. The LHN figures for Northampton Borough and South Northamptonshire show significant increases. We consider that Daventry District will need to accommodate a significant proportion of Northampton's future unmet needs as South Northamptonshire will have to deal with the challenge of meeting its own increased housing requirements.

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

*No comments.*

**7. Is the methodology used to determine the settlement hierarchy in Policies RA1, RA2, RA3 and RA4, robust and consistent with the evidence? Are there any significant factors that indicate that any individual settlements should have been identified in a different tier of the settlement hierarchy? If so, what key factors and evidence informed the approach of the Plan to those settlements and their intended categorisation?**

We note that the Part 2 Local Plan identifies a settlement hierarchy for the rural area. Table 2 'Classification of Settlements in the Hierarchy' identifies where each village sits within the settlement hierarchy and policies RA1, RA2, RA3 and RA4 provide more detail for each of these categories.

Policy RA1 'Primary Service Villages' defines Primary Service Villages as performing a crucial role in helping to provide an important range of services and facilities and access to employment opportunities to meet the day to day needs of the local communities which they serve. The Primary Service Villages are identified as: Brixworth, Crick, Long Buckby, Moulton, Weedon and Woodford Halse.

We consider that Brixworth is a highly sustainable village which comprises a number of local amenities and services including a primary school, GP surgery, general food store, post office, village/community hall, pubs/restaurants/takeaways, library, pre-school, employment area, publicly accessible open space including sport facilities and regular local bus services. Brixworth is also located in close to a wide range of amenities & services and a significant number of employment opportunities in Northampton.

Appendix A of the Settlement Hierarchy Background Paper identifies Brixworth with a score of 103, alongside Moulton and Woodford Halse. We do not object to the scoring for Brixworth. However, given the close proximity of Brixworth to Northampton and the regular bus services between the two settlements, we request further consideration of the status of Brixworth within the settlement hierarchy.

We consider that Policy RA1 is unsound as the policy is unjustified in terms of its evidence base. Brixworth should be identified within a higher sub-category within Primary Services Villages under Policy RA1 given the settlement's sustainability credentials.

**8. What is the approach of the Plan in terms of defining settlement boundaries or confines and development in rural areas? Do those approaches reflect the characteristics, roles and functions of individual settlements and other areas of Daventry District during the plan period?**

For the reasons discussed at point 7, we consider that the roles and functions of Brixworth present sufficient justification for residential allocations at this settlement.

**9. Is the wording of Policies RA1, RA2, RA3 and RA4 sufficiently clear for the purposes of decision-making? Is the wording consistent with other related policies of the Plan (i.e. Policies ENV7, ENV10, EC4, CW3)? Is the restriction that development outside of defined confines will only be acceptable in "exceptional circumstances" as set out in Policies RA1 and RA2, justified and consistent with national policy?**

*No comments.*

**10. Is the approach of Policy RA6 relating to the open countryside, justified and consistent with national policy?**

*No comments.*

**11. Are the approaches of Policies NP1, RA1, RA2 and RA3, justified and consistent with national policy, in so far as they seek that allocations in neighbourhood development plans comply with criteria set out in the relevant settlement hierarchy policy of the Plan?**

Part D of Policy RA1 states that “*development that is provided for in a made neighbourhood development plan will also be supported. Neighbourhood development plan policies and/or allocations should be in general conformity with the requirements of parts B and C*” of the policies.

Part C of Policy RA1 seeks to ensure that the role of the role of these villages in the settlement hierarchy is maintained through identified criteria for development. Part B states that “*development outside of the defined confines will only be acceptable in exceptional circumstances.*”

We object to the wording of part D of Policy RA1, specifically that Neighbourhood development plan policies and/or allocations should be in general conformity with the requirements of part B. It is our view that Neighbourhood Development Plans should be allowed to identify residential allocations outside of the defined village confines of the Part 2 Local Plan without needing to demonstrate exceptional circumstances.

Paragraph 5.1.05 of the Part 2 Local Plan states that further allocations could come forward through neighbourhood development plans or exception sites. However, the restrictive nature of Part B means that residential allocations are less likely to be identified through the Neighbourhood Plans. Furthermore, the focus towards additional housing growth at Daventry town and no growth in the rural area means that there will be far less of an incentive for Neighbourhood Plans to be prepared and therefore, reliance on further residential allocations coming forward through Neighbourhood Plans is totally unrealistic.

**12. Are Policies NP1, SP1 RA1, RA2, RA3, RA4, RA5 and RA6 otherwise positively prepared, justified, effective and consistent with national policy?**

For the reasons discussed above at point 7, we consider that Policy RA1 and the associated evidence base under the Settlement Hierarchy Background Paper (Version 2 – July 2018) is not justified.

**Issue 2: Whether the approach towards infrastructure is justified, effective and consistent with national policy, so as to ensure the timely delivery of the scale and distribution of development in the Plan.**

**Questions**

**1. What are the likely impacts of the proposed scale and distribution of development on infrastructure? How have these been assessed?**

*No comments.*

**2. What specific improvements to infrastructure are proposed or will be required? What is the likely cost? How will they be brought forward and funded?**

*No comments.*

**3. Have the A45 Braunston Road/Timken Way roundabout, A45 Stefen Way/A425 roundabout and Eastern Way/Northern Way roundabout been subject to individual junction traffic modelling as part of the Plan to identify the scale of improvements required in accordance with the recommendations of the Transport Modelling evidence (TR1 and TR2)? How are any improvements intended to be delivered by the Plan?**

*No comments.*



4. Is the approach in the Plan justified with respect to the Northampton Northern Orbital Route and Northampton North West Relief Road? Are there any updates in terms of the current status of those projects, routes, timescales and sources of funding? Have the potential implications of the delivery of those projects been accounted for as part of the identification of allocations in the Plan?

*No comments.*

5. Is there a need to include any additional specific infrastructure projects in the Plan? Does the Infrastructure Delivery Schedule (Appendix H) take sufficient account of the need to assist delivery of the allocations and any cross-boundary implications of infrastructure requirements?

*No comments.*

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