



# Daventry Local Plan (Part 2) - Statement to Matter 2 Spatial Strategy

for Grasmere Strategic Land (Northampton)  
Respondent PS083

Project : 14-116  
Site address : Matter 2 Statement to  
the Daventry Local Plan  
(Part 2)  
Client : Grasmere Strategic Land  
(Northampton)  
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## 1. Introduction

1.1 Emery Planning is instructed by Grasmere Strategic Land (Northampton) to submit this Statement to the Examination of the Part 2 Plan following our representations to the Submission Draft.

1.2 Our specific interest is the land south of Boughton Road, Moulton which is addressed in Section 2 of our representations. This is referred to as site PS083 in EXAM 1E.

1.3 In summary our representations are on the following basis:

- The omission of the site as an allocation in the local plan;
- An objection to the designation of the site as Green Wedge (Policy EV3);
- An objection to the wording of Policy EV3;
- Seeking greater flexibility in the plan to provide housing sites to meet Northampton's housing needs.

1.4 This Statement deals with Issue 1 of Matter 2: Spatial Strategy which states:

*“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.”*

1.5 We rely on our submitted representations and our responses below are to the Inspector's questions in the MIQs.

## 2. Questions 1 and 2

**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?**

**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?**

2.1 For Daventry District Policy S3 (Scale and Distribution of Housing Development) of the WNJCS sets an overall requirement of 12,730 dwellings to be distributed as follows:

- Daventry Town about 4,620;
- Daventry Rural Areas about 2,360; and,
- Northampton Related Development Area about 5,750.

2.2 The Northampton Related Development Area – Part 2 Local Plan Background Paper (**GEN03**) sets out the proposed trajectory to meet the NRDA requirement. Table 2 (Daventry District NRDA SUE's – Predicted WNJCS delivery v revised delivery) shows that there will be a shortfall of 1,988 dwellings (5,750 minus 3,762) in the plan period.

2.3 For Daventry District excluding the NRDA, the total projected supply in **HOU7** is 8,544 dwellings against a requirement of 6,985. This is a surplus of 1,559 dwellings.

2.4 On that basis the total supply including completions for each area would be:

|                      | Policy S3 | HOU7 and GEN03 | Difference |
|----------------------|-----------|----------------|------------|
| Daventry Town        | 4,620     | 5,027          | +407       |
| Daventry Rural Areas | 2,360     | 3,737          | +1,377     |
| NRDA                 | 5,750     | 3,762          | -1,988     |
| Total                | 12,730    | 12,526         | -204       |

- 2.5 Adding the lapse rate of 220 dwellings, then the shortfall is 424 dwellings to that required in Policy S3.
- 2.6 The table also shows that the requirement for Daventry Town and the Rural Areas is projected to be exceeded. However there is projected to be a significant shortfall at the NRDA. It cannot be said that the surplus at Daventry and the Rural Areas can negate planning to meet the NRDA need as it is specific to the needs of Northampton and is to be delivered primarily in or adjacent to the NRDA boundary.
- 2.7 In answer to Q1, the scale of development is not consistent with the JCS as:
- it fails to deliver the total requirement in Policy S3; and,
  - it fails to deliver the specific requirement for the NRDA.
- 2.8 In answer to Q2, the Plan is not consistent with the JCS and whilst the housing needs of Daventry Town and the Rural Areas, as on the basis of the projected delivery rates, the minimum housing needs of Northampton to be planned for in Daventry are not being met in this Plan.

### 3. Questions 4 and 5

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

**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?**

3.1 We respond to Q4 and Q5 together as follows. In summary the Plan does not include sufficient flexibility or contingencies and does not intend to assist in the delivery of plan-led development to meet Northampton’s needs. This is clearly set out in paragraph 4.4 of the NRDA Background Paper (GEN03) which states:

*“Consequently, neither a criteria based policy nor non-strategic allocations, alone or in combination are considered to be appropriate to be included in the part 2 Local Plan for Daventry District.”*

3.2 We consider that in the absence of any meaningful start to a review of the WNJCS and then the time for such a review to take place, this Part 2 Plan cannot ignore such a significant shortfall and should have a policy enabling sites to come forward or allocate omission sites.

3.3 Allowing planning applications through development management is a position adopted by South Northamptonshire as set out in the report to the 19<sup>th</sup> September 2018 Planning Committee, which states:

*“Policy NRDA- Northampton Related Development Area-:*

*3.12 Policy NRDA1 has been deleted from the plan following consultation with Natural England and continued discussion with the partner Authorities. As drafted, the NRDA Policy appropriately guided development to the most optimal locations which would be considered acceptable. Effectively, it ruled out all areas to the west of the M1 and areas in Harpole and Kislingbury parishes where there are undeveloped Sustainable Urban extensions and ‘made’ Neighbourhood Plans. However, there remain significant concerns about the impact of development to the east of the M1 on highways, and infrastructure provision as well potential impacts on the Upper Nene Gravel Pits Special Protection Area.*

*3.13 Due to these constraints, it remains unclear as to the scale of development that the Policy could realistically deliver within the short lifespan of the policy. The review of the Part 1 Plan (the WNJCS) will commence in 2018*

and it is considered that this is the most appropriate mechanism to consider the future growth needs of Northampton in a comprehensive way.

**3.14 Officers consider that suitable sites, so far as necessary to meet the housing needs of Northampton, where they are immediately adjoining the built up area of Northampton or well related to existing, allocated Sustainable Urban Extensions (SUEs) under construction, could be brought forward through the Development Management Process.** Such sites would be required to be in conformity with WNJCS Policy S4 and set out how they contribute to meeting the vision and objectives of the WNJCS.

3.15 The revised plan makes clear that development in the villages will continue to be considered as 'rural' development and SNC will proactively seek to accelerate delivery on the SUEs within its administrative boundaries. The deletion of this policy overcomes a range of concerns raised by DDC, NBC and NCC under the DtC. However, joint work to address the speed of delivery and ensure that Northampton's housing needs can be met will continue to be a priority." (our emphasis)

- 3.4 We accept that the position is not identical in Daventry as strategic sites are progressing. Nevertheless GEN03 states that there is a shortfall of 1,988 dwellings (at best) at the NRDA within Daventry. On that basis this issue cannot be left to a plan review. Indeed the plan review is some 2 years behind the timetable set by the Local Plan Inspector for the JCS, which added the following text as a Modification (MM2) for the plan to be sound:

"Delete Paragraph 3.18 and the heading above it in Section 3.0 Introduction and replace it with the following:

"Review of the West Northamptonshire Joint Core Strategy

3.18 In order to ensure that the local planning policy framework in West Northamptonshire remains up to date in the light of changing economic, social and environmental issues and new evidence Daventry District, Northampton Borough and South Northamptonshire Councils commit to undertaking a review of the West Northamptonshire Joint Core Strategy to a plan period end date of 2036 or such longer period as the Councils choose, with

the aim of having an adopted plan in place by 2020. This review will be led by the National Planning Policy Framework approach of objective assessment of housing, employment and other needs and the requirements of the duty to co-operate with adjoining authorities and other organisations as necessary. **This review will commence once the three Part 2 Local Plans covering West Northamptonshire have been submitted to the Secretary of State for Examination. This is expected to be in 2017.** The West Northamptonshire Local Development Scheme will be updated following the adoption of this Joint Core Strategy to reflect these anticipated timescales for the review." (our emphasis)

- 3.5 Daventry is ahead of the two other LPAs in the JCS area, as South Northamptonshire submitted their Plan in January 2019 and the consultation on the Northampton Submission Draft commenced on 1<sup>st</sup> May 2019.
- 3.6 The latest version of the Local Development Scheme (September 2018) anticipates adoption in January 2022. Even without slippage, that is almost 3 years away and therefore the JCS review provides no solution to the immediate and pressing need for housing. A further issue that could cause delay is the proposal for Northamptonshire to have unitary status. From our experience in Cheshire East and Cornwall this had a significant bearing on the preparation of their new development plan.
- 3.7 Our position is that there should be a development management policy to meet the serious and persistent under delivery of new homes. We consider that limited development at the Primary Service Villages in close proximity to Northampton should be encouraged and form part of that policy. This would not be inconsistent with the development strategy as the requirements in the WNJCS, whilst split, are not maxima and Policy S4 is clear in its locational requirements which is that development is not exclusively to be located in or adjacent to the NRDA boundary.
- 3.8 The Aylesbury Vale Local Plan Inspector (29<sup>th</sup> August 2018), which we refer to in our submissions, was clear that the plan should “*not simply abandon its function to a future review of uncertain timescale*”. This comment was made as the LPA in that case sought to await further guidance on the Oxford-Cambridge Arc. In the WNJCS area the housing need is predictable as it forms part of the development, yet, the Part 2 plans are failing to meet that need in full and relying on a plan review with no certainty on its timing or that the need will be met.
- 3.9 Although not for this Part 2 Plan, going forward the review of the JCS will be based on Local Housing Need. On the current methodology, the requirements for each LPA are:
- Daventry – 372 per annum;
  - Northampton – 1,333 per annum; and,
  - South Northamptonshire - 512 per annum.

- 3.10 This gives an annual local housing need requirement of 2,217 dwellings per annum which is only slightly lower than the 2,368 per annum in Policy S3. On the basis that Local Housing Need is a starting point then there is no material change to the housing need in the JCS area.
- 3.11 It is our position that the Part 2 Plans in the NRDA must meet the need in the JCS through sites in or adjacent to the NRDA or in sustainable locations in close proximity, for example Moulton. We proposed in our representations that such a policy is included, which was based on a development management policy in the Modifications to the North Devon and Torrridge Local Plan. We have altered the geographical terms but the policy remains as drafted and the triggers can be altered:

*"If monitoring identifies that the number of dwelling completions across the NRDA in a monitoring year falls below 90% of the annualised dwelling requirement, and the housing trajectory for that year indicates that the rate would not recover to an average of at least 100% for the two subsequent monitoring years, then proposals for additional residential development outside of defined settlement limits will be supported where they are:*

*(a) in a location and of a scale and nature commensurate to the deficit in required housing;*

*(b) able to demonstrate the ability to contribute in a timely manner to addressing the deficit in housing supply;*

*(c) broadly consistent with, not prejudicial to and contributing towards the positive achievement of the Plan's overall spatial vision and strategy for West Northamptonshire along with the relevant settlement vision and development strategy; and*

*(d) in all other respects in accordance with other Local Plan policies, in so far as they apply."*

- 3.12 We therefore request that such a policy is included in the Plan.

### **Policy RA1**

- 3.13 An alternative is that Policy RA1 could be amended to include a policy permitting development to meet the wider housing need in Northampton in specific villages.

### **Omission Sites**

- 3.14 A further option is for omission sites to be allocated to meet the shortfall in the requirement in the development plan. Our specific interest is the land south of Boughton Road, Moulton which

is addressed in Section 2 of our representations and is referred to as site PS083 in EXAM 1E would be one such site. Our understanding from the MIQs is that omission sites are not to be discussed, however if that is not the case we would refer to our previously submitted representations on the site specifics.

**Question 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?**

3.15 We have an objection to the methodology and policy wording for Green Wedges and we set out our position on these points in Matter 5.

3.16 Proposed Policy ENV3 states:

*"A. To protect the identity, character and setting of settlements within the areas that fringe Daventry and Northampton proposals within the Green Wedges will be required to demonstrate that they would maintain:*

*i. The physical and visual separation between settlements; and*

*ii. The openness around settlements and their settings.*

*B. The Council will support proposals that contribute towards increased public access to, and enjoyment of, the Green Wedges, particularly from the Sustainable Urban Extensions in the Northampton Related Development Area, providing they are compatible with i) to ii) above.*

*The designated areas of Green Wedge are shown on the Policies and Inset Maps."*

3.17 Our overarching point is that greater flexibility should be provided to ensure housing needs can be met whilst not having a material impact on the identity, character and setting of settlements. Policy ENV3 is an added restrictive designation that duplicates other policies in the plan and the boundaries have not been fully reviewed through the Plan process.

3.18 Should the policy remain, we have a specific objection to Part A(ii) of the policy. This is because the openness around settlements and their settings have no bearing on the status of a gap between settlements which is the purpose of the policy in order to protect the identity and distinctiveness of settlements.

3.19 We propose that Part A(ii) is deleted. The following wording is from Policy EN4 of the Preston Local Plan. We were involved at the Examination and the policy was amended in order to be

permissive of development provided the aims and objectives of the policy were not adversely affected. On that basis we would propose that Parts A(i) and A(ii) of Policy EV3 are deleted and the following text inserted.

*“Development will be assessed in terms of its impact upon the Green Wedge including any harm to the effectiveness of the gap between settlements and, in particular, the degree to which the development proposed would compromise the function of the Green Wedge in protecting the identity and distinctiveness of settlements.”*

## 4. Conclusion

4.1 To conclude, the development plan is clear that there is housing need to meet and whilst in Daventry the Rural Areas have over-delivered, Northampton's needs, which form the majority are not being met with a significant shortfall.

4.2 Therefore, the Plan is not:

- positively prepared as it fails to provide a strategy which seeks to meet the area's objectively assessed needs;
- justified as it fails to provide an appropriate strategy to meet the JCS and does not take into account the reasonable alternatives such as the inclusion of additional allocations or flexibility to policies to facilitate additional housing delivery;
- effective as it is not based on effective joint working on cross-boundary strategic matters that have been dealt. Instead decisions to meet the housing need have been postponed to a plan review;
- consistent with national policy as it fails to meet the minimum housing need in the development plan contrary to paragraph 47 of the Framework.

4.3 This concludes our Statement to Matter 2.