

Gladman Hearing Statement
Settlements and Countryside Local Plan (Part 2) for Daventry
District - Examination

Matter 2: Spatial Strategy



May 2019

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.

Q1. 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?

- 1.1.1 In terms of housing provision, the JCS is clear in setting out the overall scale of development required by the Plan. Daventry District will make provision for about 12,730 dwellings between 2011 and 2029. To be effective and consistent with the JCS, the Part 2 Plan needs to ensure the delivery of this requirement by 2029, whilst being in line with the spatial strategy of the JCS. Currently it does not achieve this as it fails to tackle the issues around the NRDA requirement that will be discussed in more detail below.
- 1.1.2 The JCS housing requirement is broken down for Daventry District in three component areas. Daventry Town is required to provide about 4,620 dwellings in the plan period, the rural areas will provide about 2,360 dwellings and the NRDA is required to provide about 5,750 dwellings. The Council are currently seeking to isolate the requirements of the individual areas and fails to tackle the requirement for 5,750 dwellings within the NRDA.

Q2. 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?

- 1.1.3 The three component areas of JCS housing requirement provide the spatial strategy for Daventry District. Daventry Town is required to provide about 4,620 dwellings in the plan period, the rural areas will provide about 2,360 dwellings and the NRDA is required to provide about 5,750 dwellings.
- 1.1.4 In dealing with omission sites, the Inspector for the JCS in his Inspector's report states in Paragraph 149 '*the revised level of new housing required over the plan period, whilst challenging, is deliverable on the allocated sites without the need for further allocations or additions/extensions to the already identified areas to assist*'. Through Paragraph 150 he goes on to leave the door open for further sites of a non-strategic scale to be considered through the Part 2 Plans. Things have moved on since

adoption of the JCS, varying reasons have led to a delay in the delivery of the SUEs, with monitoring indicating that Daventry District will fail to deliver the NRDA requirement by 1988 dwellings by the end of the plan period.

1.1.5 The Council is doing nothing to seek to rectify the estimated shortfall in the NRDA area now, instead opting for this to be dealt with through a review of the JCS. This approach is not consistent with the JCS, which would in fact support action being taken now, nor the 2012 Framework which through Paragraphs 14 and 47 requires Local Planning Authorities to positively seek to meet the development needs of the housing market area.

1.1.6 An overview of the key policies of the JCS is useful in determining what approaches are available to the Council in seeking to rectify this issue, whilst ensuring consistency with the JCS:

- Policy S4 sets out that ‘additional development will be supported only if it meets the vision, objectives and policies of this plan.’
- Policy S1 sets out that development will be concentrated primarily in and adjoining the principal urban area of Northampton. (Emphasis added). The Council confirms that the NRDA boundary is the same as the principal urban area of Northampton boundary in Paragraph 19 of the Welford Road appeal decision (APP/Y2810/W/15/3011449).
- Policy S6 sets out the available measures where monitoring indicates targets are not being met with one of the options available to the Council being changes to the allocation of employment/ housing land. Gladman’s understanding of this is that it could mean the allocation of additional sites to help make up the shortfall.
- Policy SA sets out the positive approach to development in line with the presumption in favour of sustainable development.

1.1.7 Further allocations or a flexible criteria-based policy would therefore be broadly consistent with policies of the JCS, this approach should be adopted now ahead of a review of the JCS and is necessary to ensure that a positive approach is taken towards meeting the needs of the NRDA without delay in line with the JCS and national policy. This is discussed in detail in response to question 4.

Q3. Is the principle of focussing growth and allocations at Daventry Town and the proposed settlement hierarchy as identified in the Plan, consistent with the JCS?

1.1.8 This approach is inconsistent with the JCS as the housing sites of the NRDA are failing to deliver as anticipated in line with the trajectory set out in the JCS and as such, an alternative approach will need to be followed. There is no certainty around what level of the housing requirement in the

NRDA will be delivered with the latest available monitoring for the NRDA (April 2017) indicating that the requirement will fail to be delivered by 1,988 dwellings in the plan period.

- 1.1.9 To meet the Daventry Town element of the JCS housing requirement, the Council has sought to allocate further development sites supported by regular monitoring to determine the level of provision that will need to be allocated to Daventry Town through the Part 2 Plan. Gladman consider it to be a fundamental flaw regarding the soundness of the plan that the same approach has not been adopted for the NRDA housing requirement and do not accept the Council's position that this can only come through a review of the JCS.

Q4. Does the Plan include sufficient flexibility and contingencies to take account of unexpected changes in circumstances, including the review of the JCS?

- 1.1.10 No, the level of allocations and policy mechanisms do not allow the plan to take account of unexpected changes in circumstances.
- 1.1.11 Since the adoption of the JCS in December 2014, the supply position in the NRDA has deteriorated consistently yet the Part 2 Plan is doing nothing to reflect this continued pattern as its policy mechanisms do not allow this to be rectified in the near future, outside a review of the JCS.
- 1.1.12 Gladman consider there to be two options to enable sufficient flexibility and each will be discussed in detail below

Flexible Criterion-Policy Mechanism

- 1.1.13 The NRDA Background Paper (GEN03) makes reference in Paragraph 4.2 to the policy mechanism that was included in the draft South Northamptonshire plan, which has later been removed, that set out a flexible approach to development proposals adjacent to the NRDA whilst a supply cannot be demonstrated in the NRDA. Consideration of this approach by Daventry appears to be merely a cursory glance at this option and as is set out in Gladman's Matter Statement 1 this option has not been tested through the SA.
- 1.1.14 It is the view of Gladman that many of the issues of the Part 2 plan in regard to the NRDA can be rectified through the inclusion of this policy approach. However, the Council without having tested any patently reasonable alternatives through the SA, disagrees stating in paragraph 4.2 (Page 7) of the NRDA Background Paper (GEN03) that it considers this would encourage '*piecemeal development adjacent to the NRDA which would undermine the plan led system and the delivery of sites already allocated...*'. The Council also consider this approach not to be supported by the JCS, citing Gladman's appeal decision (APP/Y2810/W/17/3178842) and the Inspector's interpretation of the JCS, supporting the Council's own, in this case. This is one Inspector's interpretation of the policies based on an individual site at a single point in time, indeed a different Inspector took a different

interpretation in the Welford Road appeal decision (APP/Y2810/W/15/3011449) concluding in Paragraph 25 that the development adjoining the NRDA would constitute development for the NRDA and therefore in compliance with JCS Policies S1 and S4. We have set out through Paragraph 1.1.6 and 1.1.7 of this statement why we consider the Part 2 Plan needs to take a positive approach towards addressing the NRDA shortfall without delay.

- 1.1.15 A flexible policy mechanism would enable potential housing sites in sustainable locations adjoining the NRDA to come forward. The interpretation of adjoining would need to be clarified but it is the view of Gladman that this could mean either adjacent sites or sites well related to the NRDA, in rural settlements within parishes adjoining the NRDA. The policy wording would be able to set out the importance of sustainable links to Northampton in line with paragraph 34 of the 2012 Framework. The use of such a policy would enable sites to come forward for development in the short term that are capable of rapidly making up the shortfall from the NRDA.
- 1.1.16 Suitable sites include the sites that Gladman are promoting, such as at Holly Lodge Drive and land at Brington Road, Long Buckby. Long Buckby has direct rail links into Northampton and as such, a flexible policy mechanism that allowed sites in such locations to be considered favourably would constitute an effective, positively prepared plan.
- 1.1.17 The Council has also had the opportunity through the draft and pre-submission consultations to rectify the issues around the shortfall in the NRDA but has consistently failed to tackle the issue. The Council in applying a criteria-based approach could have identified the areas that would be suitable for consideration and would retain control over where it considers sites could come forward without affecting the delivery of the SUEs. This would be plan led, led by a flexible mechanism with sites suitability determined by the Council. Whilst acknowledging that the Council has sought to test the application of the criterion-based approach through Appendix A of the NRDA Background Paper (GEN03), this is not in sufficient detail or supported by proportionately robust evidence to determine why there are no sites considered suitable to come forward.

Further Site Allocations

- 1.1.18 Should a criterion-based policy not be introduced, the Part 2 Local Plan would need to make further site allocations to allow the plan to take account of unexpected changes in circumstances referencing Section 4.9 of our Regulation 19 representations where we set out the importance.
- 1.1.19 The Council has identified that there will be a shortfall in the delivery of the NRDA requirement by the end of the plan period, discussed in Question 1 in Gladman's Matter 3 statement. Sites could be allocated adjacent to or in settlements well related to Northampton in adjoining parishes as set out above. This would help to ensure that the shortfall in the NRDA can be minimised by the end of the plan period. Paragraph 4.3 of the NRDA Background Paper (GEN03) claims that the shortfall is due to the slower than anticipated delivery of allocated sites rather than there being a shortage in the supply of suitable sites. Gladman submit that once allocated sites were identified to be delivering

slower than expected, further suitable sites should have been identified through the preparation of the Part 2 Plan. Slower delivery than anticipated would also indicate a shortage of suitable sites in the early years of the plan period that could have been anticipated with the long lead in times associated with SUEs.

- 1.1.20 Rather than follow either of these options, or even testing them through the SA, the Council is seeking to defer the issue to a review of the JCS which will not resolve the issues emerging now from lack of delivery in the short term. The table below demonstrates that affordability is worsening in Daventry District and has done since the start of the plan period and following adoption of the JCS. Affordability is deteriorating quicker than across Northamptonshire, the East Midlands and England. There is strong justification for action to be taken now, ahead of the review of the JCS to seek to reverse this trend and at the very least slow it. Deferring this issue is likely to see affordability continue to worsen, conflicting with the Government's ambition to tackle the national housing crisis and rising unaffordability.

Figure 1

Ratio of lower quartile house price to lower quartile gross annual ¹								
Authority/Area	Year							
	2011	2012	2013	2014	2015	2016	2017	2018
Daventry	7.44	7.28	7.43	8.60	8.63	10.42	10.72	10.80
Northampton	5.93	5.94	6.06	6.91	7.32	7.46	8.34	8.66
South Northamptonshire	8.26	9.30	9.26	9.69	10.40	11.64	11.74	11.73
Northamptonshire	6.23	6.22	6.46	6.98	7.39	7.78	8.41	8.79
East Midlands	5.85	5.83	5.86	6.22	6.59	6.69	6.91	7.10
England	6.72	6.58	6.57	6.91	7.11	7.16	7.26	7.29

¹ Data sourced from:
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

Q5. How does the Plan intend to 'assist with 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?

- 1.1.21 Through the JCS, housing provision was distributed between the three authorities. Northampton have now published their Regulation 19 Publication Draft of its Part 2 Plan where it expects to be able to accommodate its full needs by the end of the plan period, albeit this is currently subject to consultation and yet to be tested through examination.
- 1.1.22 This is in contrast to the position in Daventry where it is not expected that the requirement will be met within the plan period. The Plan does not, and makes no provision to, '*assist with the delivery of plan-led development to meet Northampton's needs where they cannot be accommodated with the Northampton Related Development Area.*' This policy commitment could be met ahead of a review of the JCS and the plan has had the opportunity to allocate additional sites to meet Northampton's needs or introduce a flexible policy mechanism however the Council has dismissed both options repeatedly without having tested the potential outcomes through the SA.

Q6. 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?

- 1.1.23 The areas which have been identified as green wedges are extensive in nature and focused around the edge of Northampton. It is therefore essential that any associated policies recognise that proposals for sustainable development within these designated 'green wedge' areas can often be accommodated without compromising the overall function and purpose of such designations.
- 1.1.24 The Green Wedge designation should not act akin to Green Belt to prevent sustainable development coming forward on the edge of Northampton.
- 1.1.25 Without this clarification, it is unlikely that development in this area could support the delivery of housing to meet the needs of the NRDA, in an area directly adjacent and well related to Northampton.