



WRITTEN STATEMENT
to the
DAVENTRY DISTRICT LOCAL PLAN (Settlements and
Countryside)

Matter 2 – Spatial Strategy

Representations on behalf of

Pedrix Ltd

RESPONDENT Ref PS096

May 2019

This page is intentionally left blank

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?

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?

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 JCS does not provide a clear, or defined requirement for job growth in Daventry District. It includes a level of job growth for monitoring and review purposes for the West Northamptonshire area as a whole, partly based on an assessment of how to best balance economic development and housing growth. This arguably masks the complex relationships between economic development, population growth, housing demand, and the various economic geographies at play in and across West Northamptonshire over-time. It also fails to acknowledge the different sectoral and business strengths and characteristics across different parts of West Northamptonshire, and within the component Districts or Boroughs.

As identified below, and in response to Matter 4, it is considered that the draft Part 2 Local Plan adopts an unduly unambitious and unduly conservative approach to planning for employment and economic development in Daventry District.

While the need for general consistency with the overall strategy of the JCS is understood, if it is to be a sound, appropriate and effective strategy for Daventry District it is vital that the Part 2 Plan responds positively to current issues and new evidence. Such an approach can be undertaken without undermining or contradicting the objectives of the JCS.

The JCS helpfully describes its role as to provide (emphasis added):

- ***“a long-term vision for the area with an overall framework in which more detailed plans will be drawn up and decisions made.”***

- **“a broad planning strategy aimed at meeting that vision”**
- **“a strategic framework to guide the preparation of Part 2 Local Plans which will provide more detailed planning policies and site allocations”**

(W NJCS 2014, Foreword)

And also states that:

- **“The JCS is a high level strategy”** (JCS, paragraph 3.12)
- **“Allocations at a scale of below 40 ha should be considered positively during the preparation of Part 2 Local Plans where they comply with the objectives of this Plan alongside fulfilling local priorities and considerations.”** (JCS, paragraph 5.65)
- **“provides some flexibility for the [settlement] hierarchy within each area to be tailored to reflect specific local circumstances. These Part 2 Local Plans will consider the need for specific site allocations and also determine whether boundaries showing the village confines should be defined.”** (JCS, paragraph 16.9)

With regard to ‘Future Opportunities’ the adopted JCS says (emphasis added):

“In the larger urban areas the policies within the JCS must address issues of inadequate accessibility.” (paragraph 4.50)

“it is important that the area does not become over-reliant on one employment sector and continues to provide diverse employment opportunities for its residents.” (paragraph 4.53)

“The economy of the rural areas must be supported and rural diversification encouraged whilst respecting the environmental quality and character of the rural areas. The JCS will help to secure a diverse and vibrant economy, with dynamic town centres that support rural economic development through a range of local employment opportunities to meet the needs of the existing and new population.” (paragraph 4.54)

The JCS focuses on Silverstone Circuit as a key strategic location for the motorsport and high-value engineering sector. It is silent about other locations which play a less strategic (smaller scale) but still vital role in enabling and supporting this key sector, but as referred to above, the JCS is clear about the role of Part 2 Plans in this regard, and raises a range of key issues and objectives to be delivered by local planning policies. Indeed, DDC’s decision to commission further evidence regarding local (small and medium) employment sites directly indicates that the Council understands the opportunity for the Part 2 Plan to provide appropriate local policies informed by up to date and locally specific evidence.

It also responds to the guidance provided by the NPPG with regard to plan-making and evidence.

The reliance of the submitted Part 2 Plan on new sites only in Daventry town is not a sustainable approach to economic development and job creation, nor consistent with the Strategic Economic Plan of SEMLEP which is encouraging and planning for continued economic growth, including in key sectors and at a range of scales, across the South East Midlands.

Additional employment development and growth can and should be allocated to sites outside Daventry in response to clear sectoral and business needs, and in response to clear evidence of the highly constrained supply of land and premises. Such an approach would not contradict the JCS. At present neither existing employers based in the District, nor potential inward investors and parts of supply chains in key sectors keen to locate in the District, are able to identify or secure suitable sites or buildings. DDC understands these issues, and has evidence based documents which have helped to articulate

some of the challenges and implications, but appears to consider the JCS constrains their ability to enable or encourage the expansion of identified employment areas outside of Daventry town.

As set out in some detail in response to Matter 4 in addition to the above comments, there are clear and explicit objectives and policies in the JCS which enable a proactive, local approach for the Part 2 Local Plan within the strategic context provided by the JCS.

Modifications are required to the Plan. These should consist of the following:

- include an additional allocation of land to allow expansion of the Strategic Employment Area at Brixworth, geared around the opportunities to support the high-value engineering, automotive, and 'next-generation vehicles' sectors;
- there should be a commitment to review the employment land component of the Local Plan, including site allocations, sooner than the suggested 5 years – this requirement could be tied to the publication of the SEMLEP Local Industrial Strategy, and/or greater clarity regarding the employment land implications of the nascent review of the JCS.

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

In brief, no - it is overly conservative and short-sighted. It fails to provide any recognition or flexibility relating not only to current market requirements and the economic needs of key business sectors and specialisms in the District, but also to a range of well-established and well-publicised changing or emerging elements of the context in which the Part 2 Plan will exist. Further flexibility is needed, either through modifications to the Plan, and/or a commitment to mechanisms to require an early review of the Plan (or parts of it – for example, regarding employment land allocations), as suggested above (Questions 1 -3).

As referred to in response to Matter 4, the Part 2 Plan fails to respond appropriately to the flexibility provided by the adopted JCS to reflect the local context and specific opportunities, as well as to the Council's evidence base regarding market conditions and unmet business requirements.

The emerging Part 2 Local Plan should not only look 'back' to the adopted 2014 JCS, but must also ensure flexibility geared around the clear signals of emerging strategic priorities which will provide the context both for the JCS Review, and local planning strategy and decisions in Daventry in due course. This lack of cognisance of changing circumstances is not only limited to inadequate flexibility or contingency to reflect the emerging review of the JCS, but numerous other strategic components of the planning and economic development context for Northamptonshire. A number of highly relevant changes to the context in which the Part 2 Plan will exist are either underway, or have already been introduced, and are likely to have a direct and potentially significant bearing on the approach to growth and investment across West Northamptonshire for coming years, including in the relatively short-term.

Among the ongoing and well understood changes of particular note are:

- the publication of an **updated Strategic Economic Plan by SEMLEP in 2017** setting out a vision for the economic growth of the broader South East Midlands – this is clear about key industrial sectors, and sets a strategic context to support and expand specialisms and sectoral expertise. 'Showcase sectors' include high-performing technology including next generation transport, and manufacturing and advanced technology. Identified challenges include the

shortage of employment land across much of the area, and explicit objectives include (Section 3.3 of the Strategic Economic Plan):

- *“the expansion of existing businesses in the area;*
- *relocation of existing businesses to the area;*
- *new businesses (domestic or foreign) setting up in the area.”*
- **new evidence commissioned by DDC with regard to the shortage of small and medium sized employment sites and premises** (referred to in further detail below). The importance of the ‘*high performance technology*’ sector including motorsport, automotive, and precision engineering, is well understood by the LEP, with actions and strategies in place to support and grow this sector;
- **Oxford – Milton Keynes – Cambridge ‘Growth Corridor’ initiative** has gained momentum and status since 2016 (since adoption of the JCS), and encompasses much of Northamptonshire. It is being promoted and developed by the LEPs and other bodies across the relevant local authority areas as a strategic and ‘joined-up’ approach to the delivery of housing, jobs, and infrastructure. The National Infrastructure Commission Interim Report (2017) positions the corridor as “*the UK’s Silicon Valley*” with a focus on science, technology and innovation, with aspirations to double the annual economic output between 2014 and 2050, including job growth of 700,000 over the same period¹, and a role in supporting over a million new jobs. The corridor could see plans to deliver over 1 million new homes and significant population growth. Figure 1 enclosed provides a brief summary of the background to this initiative.
- The LEP is preparing a **Local Industrial Strategy (LIS)**, and also coordinating with other LEPs across the wider Oxford – Milton Keynes – Cambridge Corridor to prepare a Joint LIS. A draft SEMLEP LIS was submitted to Government earlier this year, and a final version is likely in late June or early July 2019. The LIS will further expand upon the sub-regional economic strengths and opportunities, linking in part to the objectives and priorities of the National Industrial Strategy of November 2017. The emerging LIS is clear about the sectoral strengths and clusters which represent the most growth potential as part of a coherent strategy to foster and enable further innovation, value added to the local and national economy, and job growth. The LIS explicitly recognises the value and importance of motorsport and automotive engineering, including with regard to next generation vehicles;
- **Local Government reorganisation in Northamptonshire** and the inherent uncertainties and inevitable change this will involve, including with regard to the changing strategic context and sub-regional working referred to above.
- **An updated NPPF (February 2019).**

In the context of the above, Daventry DC does not have a straight-forward task – they are seeking to prepare a new Local Plan document at a time of significant and dynamic change across Northamptonshire (and beyond). Given the early stages of the review of the JCS itself, the timing of seeking to bring forward a Part 2 Plan based purely around the 2014 Plan is questionable – the long-term strategy for West Northamptonshire is inevitably going to change in the early part of the period post-adoption of the Part 2 Plan. However, with a range of other strategic and dynamic issues at play

¹ National Infrastructure Commission interim report, Cambridge – Milton Keynes – Oxford corridor, 2017 – paragraph 1.14.

in the Daventry and wider Northamptonshire economy as referred to above, the challenge is arguably even more significant.

The requirement to tie the Part 2 Local Plan to the strategic framework provided by the adopted – increasingly dated – JCS is understood, but this notwithstanding, the Plan should also respond to the updated NPPF, and to the policy objectives and imperatives which now feature as material considerations for planning in Daventry District. The NPPF (paragraph 6) recognises the materiality and relevance of both Written Material Statements and endorsed recommendations of the National Infrastructure Commission which is progressing the Oxford – Milton Keynes – Cambridge Growth Corridor’.

It is accepted that the Growth Corridor is clearly a strategic (rather than ‘local’) initiative but it, and the nascent JCS Review, will have direct and potentially very significant impacts on the future spatial strategy for Daventry District and the rest of West Northamptonshire with regards to employment and housing. For the Part 2 Plan to make no attempt to reflect or prepare for the clear ‘direction of travel’ while also failing to respond to the existing market signals and evidence regarding the severely constrained employment land supply, is not sound.

The Brixworth SEA is an active part of the automotive and high-value engineering sector clusters which feature prominently in the economic strategies for Northamptonshire, the South-East Midlands, and the Oxford – Milton Keynes – Cambridge Growth Corridor’.

There is a need for the Plan to display greater awareness of current and emerging economic pressures and opportunities, and seek to balance the need to comply with the existing JCS with the need to ensure the emerging Part 2 Plan has a meaningful and relevant role to play in informing planning decisions across the District. The highly restrictive and limited response to the recognised need for a choice of employment sites to meet the needs of occupiers seeking smaller and medium-sized premises should be revisited to deliver a more proactive, and flexible context which will enable delivery against current, as well as future planning and economic development policies and objectives. Sites outside Daventry, such as an expansion to the Employment Area at Brixworth, should be allowed for.

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?

Brixworth is a Primary Service Village – the 2nd tier in the settlement hierarchy. Given the tiers of the hierarchy, this seems an appropriate designation for the village, and it is clear that the emerging Part 2 Local Plan recognises the role of these villages in accommodating the “*highest level of services and facilities*” (paragraph 5.2.01) in the rural area, and meeting local housing and employment needs. In this regard, it’s clear that this tier in the settlement hierarchy is ideally situated to assist in delivering job growth as part of delivering sustainable economic growth in the District.

Brixworth village already has a ‘Strategic Employment Area’ (SEA) defined in Policy EC4 and identified on the emerging proposals map insets (EC4d). As referred to in response to other questions (under both Matters 2 and 4) a large part of this existing, high-quality and recently intensified employment area remains outside of the village, despite being well-established, and home to high-value, and high-density research and development, and manufacturing uses by Mercedes AMG Powertrains.

Paragraph 5.2.12 of the Submission Draft Plan refers to village confines including Strategic Employment Areas where these “*adjoin the village*”. Despite the significance of the Brixworth Employment Area area which is located adjacent to the A508 in the north-eastern part of the village, the part of it to the east of

the A508 remains outside of the village. Given the content of the proposed policies it is not clear why the village confines have not been amended - this should be addressed by the Part 2 Plan.

As questioned in earlier representations, it is unclear how this approach sits with that explained in paragraph 5.2.08 of the Submission draft Plan which refers to peripheral *residential* sites being “regarded as being within the village confines” once built out. The justification for the inconsistency with employment sites is unclear. If residential sites are automatically to be considered as part of the village, it seems incongruent that part of the Brixworth SEA remains to be outside of the village confines.

By implication, the Neighbourhood Plan appears to have define the village confines, but has taken a different approach to that set out by the emerging Plan.

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?

In brief, no – this is not justified or consistent with national policy.

The emerging ‘Spatial Strategy’ as set out in draft policy RA1 and the text which precedes it identify the important economic and employment role of the Primary Service Villages, including at the ‘*Strategic Employment Areas*’ which are located in four Primary Service villages as well as in Daventry town. The good accessibility by public transport of this category of villages is also recognised.

The important economic function of Brixworth is recognised in the adopted Neighbourhood Plan which seeks to maintain a “*vibrant local economy*” as one its key objectives (paragraph 5.7, Brixworth Neighbourhood Plan, December 2016).

Despite this context which strongly supports the view that Primary Service Villages are suitable for further growth, including an obvious synergy with JCS, the Submission Draft Plan makes reference to the development which has been consented or delivered in the villages, and the risks of undermining the distribution of development established in the JCS if further development were allocated to the Primary Service Villages. It is clear from paragraph 5.2.17 that the perceived concerns and risks primarily relate to the proportionately high levels of *residential* development seen outside of Daventry town over recent years which means further residential allocations are not considered necessary or appropriate. There is no explicit reference to employment development, and no evidence of major employment applications having been approved to date. The justification and rationale for taking a ‘one size fits all’ or blanket approach to significantly limit any kind of development in the Primary Service Villages is unclear. As referred to in the context of Policy EC4 the evidence base regarding the market demand for, and opportunities for, additional appropriate ‘non-strategic’ employment space (delivering small and medium-sized premises) is compelling.

Indeed, the relative over-delivery of residential development in the rural area since adoption of the Core Strategy, including places like Brixworth, would represent a sound justification for making additional, appropriate allocations of employment land to support sustainable patterns of development, and to reduce the need to travel. The NPPG makes several references to the opportunities to plan for housing and employment using a common evidence base, and as part of a joined-up spatial strategy.

In summary, the approach to employment development in this location which is overly restrictive and unsustainable. In seeking to re-focus residential development on Daventry the emerging Plan includes

very tightly drawn settlement boundaries at the Primary Service Villages. There are no new employment site allocations proposed at existing Strategic Employment Areas (SEAs), and the Brixworth SEA inappropriately remains outside of the settlement confines.

Requiring 'exceptional' circumstances in order to support economic development and growth, even when directly related to or adjoining, designated Strategic Employment Areas, is inconsistent with the context provided by the LEP's Economic Strategy, emerging Local Industrial Strategy, and the NPPF.

The proposed approach could be made to work more effectively in practice were the Plan to include an appropriate definition of 'exceptional circumstances' – such a **modification** could limit the contradictions between the emerging Plan's objectives, the JCS, and other economic drivers and priorities. It could help ensure that the Part 2 Plan has a longer 'shelf-life' than it is otherwise likely to have, and should help limit the extent to which the Local Plan further exacerbates the existing barriers to investment and job growth caused by the severe shortage of employment land and premises.

Were the Inspector, and Council, minded to make such a modification, a definition should be devised and consulted upon, but to ensure a more proactive and flexible plan could include reference to permitting expansion of the Brixworth (and potentially other) Strategic Employment Area beyond the current boundaries with a definition which includes some or all of the following key elements:

- directly supporting the expansion of employers working in locally significant priority economic growth sectors for, or key parts of their supply chains, as identified in Local Plan documents, or by SEMLEP;
- not involve land in designated or highly sensitive landscape areas, subject to other environmental protections, or in areas at high-risk of flooding;
- Expansion only permitted where it would not have major or severe impacts on the highway network, nor have a significant impact on local residential amenity;
- Expansion would be of an appropriate scale to the setting, with clear, defensible boundaries.

Such measures would more directly respond to the challenges and priorities of the Strategic Economic Plan prepared by SEMLEP.

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

Brixworth is a Primary Service Village ideally situated to assist in delivering job growth as part of delivering sustainable economic growth. The village already has a 'Strategic Employment Area' defined in Policy EC4 and identified on the emerging proposals map insets (EC4d). As referred to below, this existing, high-quality and recently intensified employment area remains outside of the village, and it is unclear how this approach sits with that explained in paragraph 5.2.08 of the consultation draft which refers to peripheral residential sites being "regarded as being within the village confines" once built out. The justification for this apparent inconsistency with employment sites is unclear.

Also see response to Q9 above.

The Growth Corridor: a brief background



2016

LEPs, LAs
Universities &
others fed into
NIC Call for
Evidence on
challenges,
proposed
interventions
and the vision
for the
Corridor.



- ▶ Recognised the Corridor as having the potential to be "the UK's Silicon Valley – a world-renowned centre for science, technology and innovation".
- ▶ Recommended further funding for East-West transport links, as well as investment in its wider road and rail network.
- ▶ Stressed the importance of a joined-up plan for housing, jobs and infrastructure.



- ▶ Welcomed the NIC's Interim Report
- ▶ Pledged £110m for East-West Rail, and £27m to fund the development of the next stage of the new Oxford to Cambridge Expressway.

2017

Joint working
across
Corridor on
issues of
governance,
transport,
etc.



- ▶ Suggested annual output of the corridor in 2050 could be £163bn higher than in 2014 – approx. doubling the growth expected without intervention.
- ▶ But stressed need to align public and private interests behind the delivery of significant E-W infrastructure and major new settlements, with 1m new homes required by 2050.



- ▶ [The Government] "invites stakeholders from across the region to engage over the next 12 months to turn this high-level vision into a strategy that is capable of being delivered through an integrated programme of infrastructure investments, housing and business growth."

"This area is already amongst the most economically successful in the UK. The government wants to build on that success for the benefit of the whole of the nation. It is therefore right that the private sector should play a significant part in delivering this vision, through both direct investment and the reinvestment of land value increases created by strategic infrastructure, for the benefit of local communities." [Budget 2017]