



**DAVENTRY DISTRICT SETTLEMENTS AND COUNTRYSIDE
LOCAL PLAN EXAMINATION**

STATEMENT ON BEHALF OF:

**DAVIDSONS DEVELOPMENTS LIMITED
AND ROBERT MILLNS AND JOSEPHINE MILLNS –**

Respondent Reference PS056

MATTER 2: Spatial Strategy

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PPG Ref: EMS.2875

Date: May 2019

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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?*
- 2.1 For Daventry District the Joint Core Strategy requires about 12,730 dwellings to be provided over a plan period running to 2029. In terms of distribution, about 4,620 dwellings are directed to Daventry Town and about 5,750 dwellings to the Northampton Related Development Area. For the rural parts of the district, the requirement is for about 2,360 dwellings, again over the plan period to 2029. This means that the JCS sets a total requirement of 6,985 dwellings for Daventry Town and the Rural Areas.
 - 2.2 The Part 2 Plan is silent on provision within the NRDA part of the district. As a result, the Part 2 Plan and the housing trajectory set out at Appendix J to the Submission Plan is incomplete and therefore not consistent with the JCS.
 - 2.3 It is understood that the latest information on the expected housing trajectory for the plan period is as set out in the Housing Background Paper, December 2018 (ref HOU1). This shows a total of 8,764 dwellings

being provided over the plan period – 5,027 dwellings at Daventry Town and 3,737 dwellings in the rural areas.

- 2.4 The trajectory is helpful in demonstrating how provision in the rural settlements has played an important role in supporting housing delivery in the early part of the plan period whilst delivery of housing in Daventry Town has taken place at a slower rate than originally envisaged. The increased overall provision in the rural areas has not undermined the JCS strategy to seek to focus growth outside the NRDA area on Daventry Town.
- 2.5 Whilst the proposed strategy recognises the sustainability of rural settlements in its approach to the settlement hierarchy, it makes no further provision for the remaining 10 years of the plan other than windfalls. The plan justifies this on the basis that JCS rural apportionment for the District has been exceeded. As a result of this restrictive approach, local housing needs in the more sustainable of the rural settlements are unlikely to be met. The approach also reduces the flexibility of the plan to address potentially ongoing shortfalls in provision from the proposed larger sustainable urban extensions. The approach could also threaten the viability and vitality of services and facilities in the rural settlements by not allowing for further development to support key rural services.
- 2.6 Over the first part of the plan period from 2011, development has taken place in the rural settlements and these locations have offered suitable, sustainable and deliverable options for accommodating housing growth. Continued provision in the rural areas is important in providing for a range and mix of housing sites to help meet identified housing requirements.
- 2.7 The NPPF (2012) seeks to boost significantly the supply of housing and encourages local planning authorities to deliver a wide choice of high-quality homes. It should be noted that the housing requirements should be treated as minimums and not a ceiling on provision. The overly restrictive approach to future provision in the rural parts of the district is inconsistent with the aspirations of the NPPF and the plan is therefore unsound in this respect.

4. *Does the Plan include sufficient flexibility and contingencies to take account of unexpected changes in circumstances, including the review of the JCS?*
- 2.8 The officer response to representations raising concerns over the lack of flexibility in the plan commented that there was scope both inside and outside the settlement confines for further housing development. Reference is made in the plan's housing trajectory (Appendix J to the submission plan) to Rural Exception sites and Neighbourhood Plan allocations as further sources of housing supply.
- 2.9 Reviewing the settlement boundaries in the Policies and Inset Map document shows that there will be few opportunities for infill development within the identified settlement limits.
- 2.10 In terms of the potential contribution from exception sites for affordable housing, there is no evidence that this type of provision has made a contribution to housing requirements in the district. In terms of the likelihood of additional allocations in Neighbourhood Plans, with the Part 2 Plan not setting out any requirements for housing provision in rural settlements, Neighbourhood Plan groups have little reason to propose allocations in their plans.
- 2.11 Paragraphs 5.2.19 and 5.2.23 seek to set out exceptional circumstances where development outside village confines may be considered. However, this provides insufficient certainty to ensure further housing provision in the rural areas over the remaining 10 years of the plan period. The plan should be amended to make specific allocations for additional sites in the rural areas. Alternatively, reserve sites should be identified that could come forward when needs are identified, or specific housing numbers for settlements should be identified to be provided for through Neighbourhood Plans.
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 in the NRDA" as set out in Policy SP1. What is the current position in that respect?*
- 2.12 Policy SP1 sets out spatial principles to guide sustainable development in the district and includes Clause B which refers to assisting with the

delivery of plan-led development to meet Northampton's needs where it is identified that this cannot be accommodated in the NRDA.

2.13 It is not clear how proposed development in the district has been guided by this spatial principle. The Part 2 Plan is silent on provision in that part of the district in the NRDA and the housing trajectory presents a partial picture relating solely to the housing requirements for Daventry and the Rural areas. The Part 2 Plan should consider the overall requirement for housing provision in the district as set out in the JCS, including the NRDA requirement. It is only through this comprehensive approach that the Council can assess progress towards meeting the NRDA needs, and the scope to address any shortfall within, and if necessary, outside the NRDA boundary.

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?*

2.14 No comment.

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 identified categorisation?*

2.15 Table 2 to the Submission Draft plan sets out the settlement hierarchy, with settlements identified as either Primary Service Villages, Secondary Service Villages, Other Villages or Small Hamlets. Policies RA1 to RA4 then set out the planning approach to development at each level of the settlement hierarchy.

2.16 These representations are made on behalf of Davidsons Developments Limited who have interests in land at Boddington Road, Byfield, identified as one of 18 Secondary Service Villages. The identification of Byfield as a Secondary Service Village is supported and reflects the range of services and facilities available in the village. The Settlement Hierarchy

Background Paper, July 2018 (GEN04) notes that the settlement has a good range of services and facilities.

2.17 As set out in response to other questions, our main concern is that the plan does not take a sufficiently positive approach and should allocate land in the more sustainable rural settlements to provide for future housing needs and to provide further flexibility to deal with changing circumstances, including potential under delivery, particularly from the proposed additional sustainable urban extension at South West Daventry.

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?*

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?*

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

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?*

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

2.18 As already highlighted, the approach the Council has taken in the rural area is to severely restrict further development through the definition of tightly defined settlement limits and making no specific allocations in rural settlements, notwithstanding the fact that the Settlement Hierarchy recognises that both Primary and Secondary Service Villages are sustainable settlements with a good range of services and facilities and access to sustainable travel modes.

- 2.19 This approach severely constrains the potential for additional housing growth in the villages over the remainder of the plan period. The identified 'exceptional circumstances' are unnecessarily restrictive and will mean that the plan will not provide a range of development opportunities to ensure the delivery of strategic housing requirements.
- 2.20 Clause D to policies RA1 and RA2 requires Neighbourhood Development Plan allocations to be in conformity with the policies, including the requirement that development outside development limits will only be acceptable in the exceptional circumstances identified in the plan. There may be a number of reasons why a Neighbourhood Plan may decide to allocate land for development and that is a matter for the Neighbourhood Plan Group to establish in preparing a neighbourhood plan in conjunction with the local community. The approach unnecessarily limits the scope of Neighbourhood Plans to allocate land for development. The second sentence of Clause D should therefore be deleted.
- 2.21 The approach to development in the rural areas sets out an overly restrictive approach to development over the remainder of the plan period which is inconsistent with the NPPF's aspirations to substantially boost housing supply. Development in the rural areas has provide a useful source of sustainable development opportunities that has helped to ensure that the Council has delivered housing broadly in accordance with strategic requirements in the early part of the plan period.
- 2.22 The plan should take a more positive approach through the allocation of specific sites in the rural areas for development to provide further plan flexibility. Alternatively, the plan should include reserve site allocations in the more sustainable rural settlements that can come forward in the event of other sources of supply not delivering as expected, or identify housing numbers for settlements to be delivered through Neighbourhood Plans.