



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

**STATEMENT ON BEHALF OF:
MILLER HOMES – Respondent Reference PS058**

MATTER 2: Spatial Strategy

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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 The Joint Core Strategy (JCS) sets out a total requirement for Daventry District of 12,730 dwellings over the plan period 2011-2029. The JCS distributes this with 4,620 dwellings directed to Daventry Town, 5,750 dwellings to that part of the Northampton Related Development Area (NRDA) within Daventry and 2,360 dwellings to the rural areas. This equates to a total of 6,980 dwellings for Daventry Town and the rural areas.
 - 2.2 The Part 2 Plan does not consider provision within the NRDA part of the district and in that respect, 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 The Council's Housing Background Paper, December 2018 (HOU 1) provides an updated Housing Trajectory as at April 2018. This indicates that, for the plan period, the Council now expects 5,027 dwellings to be

delivered at Daventry Town and 3,737 dwellings in the rural areas – a total of 8,764 dwellings for these areas combined.

- 2.3 The trajectory shows how provision in the rural settlements has played a critical role in supporting housing delivery in the early part of the plan period whilst delivery of housing in Daventry Town has been slower than expected. It is not considered that the increased overall provision in the rural areas has undermined the JCS strategy to seek to focus growth outside the NRDA area on Daventry Town.
- 2.4 The concern is that, the proposed strategy of the plan, whilst recognising the sustainability of rural settlements through the settlement hierarchy, allows for no further provision (other than windfalls) for the remaining 10 years of the plan on the basis that the rural apportionment set out on the JCS has been exceeded. This approach means that local housing needs in the more sustainable rural settlements are unlikely to be met and also removes from the plan an important element of flexibility to help to deal with shortfalls in provision from the larger sustainable urban extensions if they continue.
- 2.5 Development in the rural settlements over the first part of the plan period has demonstrated that these locations offer suitable, sustainable and deliverable options for housing growth that should continue to play an important role in the plan providing for a range and mix of housing sites to help meet future housing requirements.
- 2.6 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. The overly restrictive approach to future provision in the rural parts of the district is inconsistent with the aspirations 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?*

- 2.7 In response to our representations on the Submission Plan raising concerns over the lack of flexibility due to the restrictive approach in the rural areas, officers comment that there is scope in and outside the confines settlements for further housing provision. The Housing Trajectory

at Appendix J to the plan and the updated trajectory included in HOU1, reference is made to Rural Exception sites and Neighbourhood Plan allocations as a further source of supply.

- 2.8 In reality, the potential for further housing provision in the rural areas will be severely restricted as a result of the policy approach adopted. The settlement limits for the identified Primary and Secondary Service Villages are tightly drawn. A review of 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. For West Haddon the settlement limits following the existing built up area tightly and the scope for further infill development is limited.
- 2.9 Reference is made to the potential for exception site provision for affordable housing. There is no evidence of this type of provision making a contribution to housing requirements in the district and again the scope going forward is limited. Similarly, the suggestion that other sites may be allocated in Neighbourhood Plans is highly unlikely. With the Part 2 Plan not setting out any requirements for housing provision in rural settlements, Neighbourhood Plan groups would have no reason to propose allocations in their plans.
- 2.10 Whilst paragraphs 5.2.19 and 5.2.23 seek to set out exceptional circumstances where development outside village confines may be considered in exceptional circumstances, 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 instead make specific allocations for additional sites in the rural areas, or alternatively identify reserve sites that can come forward when needs are identified.
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?*
- 2.11 Policy SP1 sets out spatial principles to guide sustainable development in the district. Clause B of SP1 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.

2.12 As 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, it is not clear how proposed development in the district has been guided by this spatial principle. 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?*

2.13 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?*

2.14 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.

2.15 These representations are made on behalf of Miller Homes Limited who have interests in land at West Haddon, identified as one of 18 Secondary Service Villages. A site location plan is included at Appendix 1. The Settlement Hierarchy Background Paper, July 2018 (GEN04) noted that the settlement is the eighth largest settlement in the district and the settlement was one of the higher scoring Secondary Service Villages in the quantitative assessment of available services and facilities. Given the

settlement's high score, it is considered that it is worthy of designation as a Primary Service Village.

2.16 Our concerns are 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?*

2.17 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.

- 2.18 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.
- 2.19 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.
- 2.20 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 provided 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.
- 2.21 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.

