
Matter 2

Spatial Strategy

Daventry Settlements and Countryside Local Plan
Examination

1. Spatial Strategy Issue 1

1.1. **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?**

- 1.1.1. JCS policy S7 sets a requirement for a minimum 28,500 net additional jobs in the period 2008 - 2029 to be created across West Northamptonshire but does not apportion that requirement across the three LPAs.
- 1.1.2. JCS para 5.53 cross refers to the WNJPU Employment Technical Paper and its updates, which identify a relationship between housing need and job provision. Policy S3 sets a requirement for 42,620 net additional dwellings during the period 2011 to 2029, of which about 12,730 are to be provided in Daventry District. Although the time period is different to the employment need, the two needs can still be correlated.
- 1.1.3. Daventry District accounts for 29.9% of the housing requirement. Attributing the net job requirement on the same basis would set a need for a minimum of 8,521 net additional jobs in Daventry in the period to 2029. The analysis we have presented in response to Matter 1, illustrates that DDC is not currently achieving employment growth in line with Northampton Borough and South Northamptonshire District. Of the jobs created in West Northamptonshire in the period 2008 to 2017, Daventry District accounted for just 13%.
- 1.1.4. There is no mechanism within the JCS or the Plan to translate the net new job requirement into a floorspace or development site requirement. Without such a mechanism it is not possible to determine if the Plan is consistent with the JCS in making provision for an appropriate level of employment development within the B classes to meet the identified need for new job creation. Neither is there a relationship between planned job growth and planned housing growth.
- 1.1.5. The Plan 7.2.01 states that the net job requirement set by the JCS was met at the point of adoption mainly by the planning permission (DCO) at DIRFT and the Northampton site at J16. However, JCS 8.19 states that expansion at DIRFT will draw labour from outside Daventry and outside West Northamptonshire, citing Rugby, Harborough and Coventry. There is no basis for complacency therefore that the required employment creation for West Northamptonshire will be met by expansion of DIRFT, which is on the edge of the area and at a strategically accessible location.
- 1.1.6. The context for the employment development is provided by a range of objectives and other policies of the JCS. Including:
- 1.1.7. JCS Objective 8: taking advantage of the internationally well placed location, strategic transport network and proximity to London and Birmingham.
- 1.1.8. JCS policy S8 supports the growth of DIRFT as set out in E4. Policy E4 provides in principle support for further rail connected storage and distribution uses and associated infrastructure at DIRFT. A Development Consent Order was made in July 2014 for phase 3 of DIRFT, to provide further strategic scale rail linked distribution development. The supporting text states that the decision on that DCO was made in light of draft policy E4.

- 1.1.9. JCS 5.69 highlights that there is not necessarily a correlation between the number of jobs in the manufacturing sector and the amount of land needed to accommodate manufacturing uses. The JCS and the Plan do not identify any provision for manufacturing as a sector.
- 1.1.10. The Employment Land in Daventry: The Demand for Small and Medium Units 2017 (DSMU) provides evidence of additional objectively assessed employment needs which the Plan should provide for. The specific identified need for non-strategic industrial / warehouse units at Crick allied to the further development of DIRFT has not been provided for at all by the Plan.

1.2. 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?

- 1.2.1. The overall approach to spatial strategy is set by policy S1, albeit this appears to be focused on housing and town centre type economic activity rather than B1b&c B2 and B8 development. The priority for use of previously developed land is specific to the provision of housing and the attainment of 30% of provision on previously developed land.
- 1.2.2. The approach of the JCS as set out at sections 4, 5 and policy S1 is to regard all areas outside the Principal Centre of Northampton, the Sub-regional Centre of Daventry, and the Rural Service Centres of Towcester and Brackley, as the 'Rural Area'.
- 1.2.3. JCS Policy S1 allows for limited development and economic activity within the Rural Areas, with an emphasis of maintaining the vitality and character of communities, shortening journey times, facilitating access to jobs and services, strengthening enterprise and enhancing linkages between settlements and their hinterlands.
- 1.2.4. JCS policy R1 provides for development to be approved exceptionally outside settlement boundaries in the Rural Area, where it would maintain or enhance the vitality of communities or contribute to and improve the local economy.
- 1.2.5. JCS policy R2 supports proposals which sustain and enhance the Rural economy by creating or safeguarding jobs and businesses of an appropriate scale for their location, subject to criteria. In this context, non-strategic industrial and warehouse units for which there is a specific need identified at Crick allied to DIRFT, (as confirmed by the DMSU) would be appropriate subject to respecting the environmental quality and character of the Rural Area and protecting the best and most versatile agricultural land.
- 1.2.6. JCS 5.65 states that allocations at a scale of below 40ha should be considered positively during the preparation of Part 2 Local Plans where they comply with the objectives of the JCS and fulfil local priorities and considerations.
- 1.2.7. Beyond the above and the identification of specific strategic allocations through policies E4 (DIRFT) E5 (Silverstone) and E8 (Northampton J16) the JCS does not set a spatial strategy for B1b&c, B2, and B8 development.
- 1.2.8. Plan policies RA1 and RA6 are more restrictive than the JCS policy R1 and R2. RA1 and RA6 do not support the exception related to contribution to and improving the local economy, which JCS policy R1 provides. Neither do RA1 and RA6 support proposals outside settlements which sustain and enhance the economy of the Rural Area.

1.3. 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?

1.3.1. See response to Question 2.

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

- 1.4.1. The Plan states at 7.2.03 - .04 that it is important to support employment uses that are non-strategic in scale and will support the District's economy. At 7.2.14 the Plan acknowledges the DMSU considers that demand for such units at Crick will increase as DIRFT is developed. The Plan does not however present the whole of the conclusions of the DMSU in this regard. The DMSU 3.41, 3.65, 3.76, 3.78, 3.79, 3.80, 3.83, & 4.4 considers that there is an existing demand for such units at Crick, and states that this is expected to increase as DIRFT is developed further. The Plan states that there is no present identified demand, and uses this as justification for making allocations at Daventry only. 3.84 states that allocations should be made at more than one location.
- 1.4.2. A DCO has been granted for DIRFT 3 and development is underway. The need for non-strategic employment development at Crick exists now and is increasing. It can be expected that the DCO scheme will be built out.
- 1.4.3. The Plan as submitted denies the evidence and does not make a positive attempt to plan to meet the identified need as it is required to do by NPPF (2012) paragraphs 17 principle 3, 156, 157, 160,161. The Plan should be making provision to meet the objectively assessed need now.
- 1.4.4. The Plan does not contain any review mechanism or embody any flexibility in the control over development with regard to the restrictions imposed by RA1 and RA6. In the absence of a site specific allocation at Crick RA1 and RA6 work against delivery of development to respond to the need for non-strategic employment development at Crick as it may further evolve over the course of the Plan period.
- 1.4.5. The Plan states at 7.2.14 that the evidence of demand for small to medium units will be reviewed within 5 years as recommended by the DMSU, and that until then provision of such units will be monitored. The Plan does not then set out any course of action or contain any conditional policy to respond to such further evidence as may be identified.
- 1.4.6. The evidence from the JAMR is that employment growth is happening far more quickly than the evidence base to the JCS predicted. The JAMR also shows that the only significant growth sector in Daventry is manufacturing (refer to PS106 Matter 1 Statement). DMSU 3.80 confirms that the demand for small to medium units is equally from B1c / B2 and B8 users. The evidence of the JAMR suggests that the need for B class industrial and distribution floorspace in Daventry District is already greater than the dated evidence underpinning the JCS. The flexibility required in the Plan therefore needs to be operative immediately from the point of adoption, to enable identified and increasing employment and B class floorspace needs to be met.

- 1.5. 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.**
- 1.5.1. RA1 does however work against Objective 6, and in this respect RA1 is not clear. Location relative to transport infrastructure is a competitive advantage which has been recognised by the Plan. That locational economic advantage is most pronounced at M1 J18 around Crick, as evidenced by DIRFT. The ability to deliver on Objective 6 at Crick is unnecessarily and inappropriately constrained by RA1 (and RA6).
- 1.5.2. RA1 is intended to deliver JCS S1 which includes strengthening enterprise outside the 4 key towns, shortening journeys, and facilitating access to jobs and services. Restricting development outside the confines of the settlement boundaries to the extent that RA1 does, works against JCS S1. In this regard RA1 is contrary to NPPF (2012) 156 as policy does not deliver the strategic priority, 14 & 157 as it is not positive towards meeting the needs identified in the Plan, and 17 as it is not a positive response to an opportunity for growth.
- 1.5.3. Policy EC4 as drafted appears intended to apply only to the Strategic Employment Areas identified on the Inset Maps. In that regard the permissive nature of EC4 (A) does not conflict with the restrictive nature of RA1.

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

1.6.1. Please refer to response to question 9.

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

1.7.1. SP1 fails to incorporate all the important elements of strategic policy from the JCS including S7 and S8. A more positive approach to employment development would be required as a result. Embodiment of a strategic objective to deliver jobs and economic growth which flows from the JCS and is central to the NPPF 17, 18 – 21, would require RA1 and RA6 to be more permissive.

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