

**SETTLEMENTS AND COUNTRYSIDE LOCAL PLAN FOR DAVENTRY
DISTRICT (LOCAL PLAN PART 2) EXAMINATION**

HEARING STATEMENT - MATTER 3

DELIVERING THE HOUSING REQUIREMENT OVER THE PLAN PERIOD

On behalf of:
Representor ID: PS082
Manor Oak Homes

Date:
May 2019

Reference:
04718/LPP2 Examination Matter 3

1.0 Introduction

- 1.1 This statement is prepared on behalf of Manor Oak Homes in relation to **Matter 3 – Delivering the housing requirement over the plan period (Issues 1 and 2)** and provides the Company's response to **Issue 1: Questions 2 and 9** and **Issue 2: Question 7** raised by the Inspector.

2.0 Response to the Inspector's Questions

Issue 1, Question 2: Is the housing trajectory in the Plan realistic? Does it demonstrate a supply of deliverable and developable sites that would meet the JCS housing requirement for Daventry District?

- 2.1 As alluded to in our client's response to Matter 2, we consider that based on current evidence the housing trajectory in the Plan, and indeed in the adopted West Northamptonshire Joint Core Strategy (WNJCS), is unrealistic.
- 2.2 Since the beginning of the current plan period the delivery of some of Daventry's smaller strategic sites has begun and progressed at pace. The various parcels of the Monksmoor development to the north west of the town have yielded approximately 400 dwellings whilst the delivery of the 129-dwelling redevelopment of the Northampton College campus near the town centre is well advanced.
- 2.3 Conversely, the LPP2 acknowledges that over the same period there has been a significant slippage in the delivery of Daventry's single largest and most important allocation, the North East Daventry Sustainable Urban Extension (SUE). It is yet to benefit from any form of planning permission, and indeed, has yet to be the subject of any planning application.
- 2.4 Following the production of a revised trajectory the Council now anticipate that the SUE will only deliver approximately 1,400 homes by 2029, a reduction of 1,200 homes when compared to the original WNJCS targets. The LPP2 acknowledges that any shortfall should now be overcome through the identification of additional allocations, now included in the Plan.
- 2.5 It is our view that even this revised delivery figure at the SUE is optimistic. The credible November 2016 Nathaniel Lichfield report 'Start to Finish'¹ assessed the lead-in and planning times for the delivery of large sites across the country. It concludes that the average time required to secure an implementable detailed planning permission for sites of 2,000 or more units (such as the SUE) is 6 years from the submission of the first outline application. It also concludes that the average build out rate on sites of

¹ 'Start to Finish' <https://lichfields.uk/media/1728/start-to-finish.pdf>

this scale are 161 dwellings per annum, as opposed to the 200 dwellings estimated in the Council's revised trajectory.

- 2.6 Based on these timescales it would mean that, if an application is submitted at the SUE prior to the end of 2019, first completions on site should not be expected until at least 2027. This timescale factors in an additional year for the delivery of supporting fixed infrastructure and a build period of 6 months. Based on the NLP reports conclusions on delivery a realistic annual delivery rate of 160 homes should then be factored into the Council's trajectory. Taken these updated timescales and delivery rates together the site would then only likely yield a maximum of 320 dwellings by 2029 resulting in a further deficit in delivery of 1,080 homes. This results in a revised shortfall of over 2,300 homes at the town that must be accounted for within the policies of the LPP2.
- 2.7 Daventry District Council's proposed policy response to the delivery shortfall at the SUE is commendable – the LPP2 currently includes draft allocations anticipated to deliver approximately 1,570 additional dwellings prior to 2029. This figure, however, still likely falls short of the actual residual requirement set out in our own estimates, above. To this end it is our view that the LPP2's response remains inadequate and a deficit in provision set against the WNJCS figure remains.
- 2.8 The single largest additional allocation at the town comprises Land at Daventry South West, set out at draft Policy HO1 of the LPP2. Policy HO1 proposes a new sustainable community of 1,100 homes supported by a masterplan led approach to development and incorporating a new primary school, a local centre and an as yet unidentified scheme of highways upgrades to accommodate the development.
- 2.9 Referring once again to the Nathaniel Lichfield report it is evident that developments of this scale (1,000 homes or more) would expect a planning gestation period of around 5 years prior to securing a fully implementable consent. In addition, it is not clear what the trigger point is for the delivery of the school. It is, however, anticipated that this will likely need to be delivered early in the lifetime of the development which may slow the delivery of the residential element. It is similarly unclear from the wording of the policy at what point the framework masterplan intended to inform the development is to be agreed by the Council. If this is to take place pre-application, it is realistic to expect that this may delay submission by a year, albeit we do understand that public consultation as part of the pre-application stage of the development is now underway.
- 2.10 Taking all of these factors into account and anticipating the submission of an outline planning application for the site by late-2019, it is realistic to expect first completions on site by 2024. Beyond this point and based on data set out in both the Lichfield report and the recent Government-commissioned 'Independent

Review of Built Out Rates², chaired by Sir Oliver Letwin, we would anticipate annual completions on site to amount to between 65-100 dwellings. Even taking the upper figure of this range as a guide the site would only deliver a fraction of its anticipated yield, approximately 500 dwellings by 2029. This would reduce the site’s contribution to the number of homes required at the town by 2029 by some 600 homes.

2.11 Based on our analysis and to reflect more realistic assumptions regarding delivery, we provide an updated version of Table 4 of the Draft Local Plan below. This factors in the anticipated under-delivery at both Land North East of Daventry and Land South West of Daventry as follows:

Table 4a: Existing Commitments (completions and anticipated supply)		
Site Name	Completions as at 1st April 2018	Anticipated supply to 2029
Monksmoor (Phase 1)	200	0
Monksmoor (Phase 2)	162	13
Monksmoor (Phase 3)	57	155
Monksmoor (Phase 4a)	0	57
Monksmoor (Phases 4b and 5)	0	356
Northampton College	35	94
Daventry North East SUE	0	320
Daventry Micklewell Park	0	450
Other sites	299	76
Sub totals	753	1,521
Total		2,274
Remaining requirement (4,620 minus 2,274)		2,346

Table 4b: Proposed Allocations	
Allocation Name	Number of dwellings by 2029 (total allocation in brackets)
HO1 – Daventry South West	500 (1,100)
HO2 – Daventry Micklewell Park Extension	250 (250)
HO4 – Daventry Land at Middlemore (increased supply)	307 (100)
EC3 – Land to the North and West of Daventry Town Centre	120 (120)
Supply by 2029	1,177
Supply in relation to WNJCS residual requirement (2,346)	- 1,169

2.12 On review of the combined strategies of the WNJCS and LPP2 it is clear that the Council’s delivery remains heavily reliant on large strategic sites. Strategic urban extensions are, by nature, slow and cumbersome to deliver. They bring with them benefits associated with critical mass but cannot provide a quick or flexible response to change. Large-scale sites can be an attractive proposition for plan makers, but they

² ‘Independent Review of Build Out Rates’ (Draft Analysis)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718878/Build_Out_Review_Draft_Analysis.pdf

are not a “silver bullet” so far as their scale, complexity and (in some cases) up front infrastructure costs means they are not always easy to kick-start.

- 2.13 Once up and running, there is a need to be realistic about how quickly they deliver homes - past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result. To avoid this, not only must the assumptions plans make about how quickly sites deliver be realistic and justified, but also allocate more sites rather than less that can support a good mix of types and sizes to ensure supply is maintained throughout the plan period.
- 2.14 In order to be sound, and in particular justified and effective, the increased requirement and/or necessary degree of flexibility should be provided by the allocation of additional sites, which have a greater certainty of delivery. Smaller extensions to existing settlements, such as that being promoted by Manor Oak Homes at south east Daventry, are an effective way in which such flexibility could be built into the Plan and ensure the maintenance of a rolling programme of housing delivery.
- 2.15 On the basis of these revised figures it is clear that, when assessed against the WNJCS figure, the current Local Plan strategy will still lead to an undersupply of housing at Daventry town of some 1,169 homes. To this end the Plan’s housing trajectory is unrealistic and fails to demonstrate a sufficient and flexible supply of developable and deliverable sites capable of meeting the residual housing needs.

Issue 1, Question 9: What contingencies are in place should housing delivery fall below expectations within the housing site allocations in Daventry Town, the rural areas and/or in the NRDA in Daventry District? Would it be necessary to consider other areas for development?

- 2.16 To largely reiterate our client’s response to Matter 2 we are concerned that there are no contingencies in place, other than the promise of a comprehensive review of the District’s housing supply position as part of the forthcoming WNJCS process. Based on our analysis set out above it is highly likely that delivery rates at both the SUE and Site HO1 will fall short of anticipated targets. In this context, it is inevitable that the NRDA will continue to under-deliver so far as it only currently has a 2.59-year supply, as of April 2018.
- 2.17 To this end we strongly recommend that the Plan incorporates measures that allow for the shortfall to be met during the early years of the plan period and certainly in advance of the completion of the WNJCS review. Whilst the most credible option the Plan does not necessarily need to identify additional allocations at this stage – it could include a permissive policy that allows other suitably located and sustainable sites to come forward where a need can be demonstrated. However, the Council must recognise that even if the key allocations at Daventry town do deliver at the forecast rates it will still only just accommodate

the identified need at the date of the examination, with the plan failing to provide contingency for any slippage.

- 2.18 In the event that additional sites are required our client's land at South East Daventry (Site 312 of the Council's Site Assessment process, Omission Site PS082/133³) is capable of delivering approximately 400 new homes; enhanced landscaping and areas of open space; clearly defined landscaped links between the Borough Hill and Burnt Walls SAMs; an extension to the High March Industrial Estate; enhanced vehicular access serving proposed Site EC9; and new pedestrian links leading to the East of Daventry.
- 2.19 Our client's land represents a sustainable and entirely deliverable residential-led opportunity at a key gateway to the town where there are no physical or environmental impediments to its delivery. This would follow through on the Council's positive vision for the regeneration of the South East of the town set out in the Daventry Masterplan 2040.

Issue 2, Question 7: (In relation to the Plan's additional housing allocations) What is the expected timescale for development in terms of lead in times and annual delivery rates, are these assumptions realistic and supported by evidence?

- 2.20 We refer the Inspector to our client's comments in relation to **Issue 1, Question 2** above and the analysis in respect of Site HO1: Daventry South West in particular.
- 2.21 In short, and without repeating the analysis both set out above and in our client's October 2018 representation, we do not believe that the expected timescale for the development of this site set out at Appendix J of the draft Local Plan – the delivery of 800 of the 1,100 dwellings along with a new school by 2029 – is realistic.
- 2.22 We consider that the trajectory for the site should factor in a longer lead in time (approximately five years rather than two) and a reduced upper rate of annual deliver (100 dwellings rather than 135 dwellings) to take account of the most robust and comprehensive evidence in respect of the delivery of large sites currently available⁴.
- 2.23 To this end it is our view that the timescales proposed in respect of Site HO1 are unrealistic and are contrary to the best evidence available in respect of the build out of large sites (1,000 dwellings or more).

³ Document EXAM1E Omission Site Fact Sheet

⁴ The NLP Report 'Start to Finish' and the Letwin 'Independent Review of Built Out Rates', links to each included earlier in this statement.

3.0 Conclusions and Proposed Changes

Conclusions on soundness

- 3.1 We consider that the Plan does not comprise a suite of policies that meet the housing needs of the area, as set out in the WNJCS. This is partially as a result of the overestimation of the ability of a combination of the existing SUE and critically, in respect of Matter 3, Site HO1 to deliver the homes needed at Daventry town. To this end the Plan cannot be considered as sound in its current form as it is not effective.

Effective:

- The LPP2 does not comprise a suite of policies that as a minimum seek to meet the areas objectively assessed needs. This is as a result of an overtly conservative approach to site allocations and a resultant lack of suitable deliverable allocations that would ensure the provision of suitable levels of housing over the plan period.

Changes Proposed

- 3.2 To ensure that the Plan can effectively ensure that the Plan complements the WNJCS and allows Daventry Council to deliver against its housing needs at Daventry town it is essential that it either includes additional deliverable allocations to account for any shortfall or a flexible policy that allows additional suitable, sustainable and deliverable land to come forward in the near future to supplement delivery.