



Daventry Local Plan (Part 2) - Statement to Matter 3 - Delivering the housing requirement over the plan period

for Grasmere Strategic Land (Northampton)
Respondent PS083

Project : 14-116
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Daventry Local Plan
(Part 2)
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(Northampton)
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1. Introduction

1.1 Emery Planning is instructed by Grasmere Strategic Land (Northampton) to make further written representations to the Examination of the Part 2 Plan. We made detailed representations to the Submission Draft and do not repeat them in detail here.

1.2 Our specific interest is the land south of Boughton Road, Moulton which is addressed in Section 2 of our representations. This is referred to as site PS083 in EXAM 1E.

1.3 In summary our representations are on the following basis:

- The omission of the site as an allocation in the local plan;
- An objection to the designation of the site as Green Wedge (Policy EV3);
- An objection to the wording of Policy EV3;
- Seeking greater flexibility in the plan to provide housing sites to meet Northampton's housing needs.

1.4 This Statement deals with Issue 1 of Matter 3 which states:

“Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy, so as to ensure the timely delivery of the JCS housing requirement for Daventry District.

The JCS plan period is from 2011 to 2029 and sets the housing requirement for Daventry District. Revising the housing requirement is not within the scope of this Plan. Discussion at this hearing session will, therefore, focus on ensuring the Settlements and Countryside Local Plan (Part 2) for Daventry District allocates sufficient housing land to deliver the housing requirement as set out in the adopted JCS. In responding to the following questions, the Council should seek to identify and address specific concerns raised in representations.2

1.5 14 Questions are then set out. We assess those most pertinent to our representations.

2. Question 1

Is there a specific reason or justification why the housing trajectory in the Plan and the Housing Land Availability Report 2018 (HOU7) when setting out the completions and housing land supply position as at 1 April 2018, exclude the NRDA component listed in the JCS? Does the Plan intend to support the delivery of the housing requirement in the NRDA in Daventry as set out in the JCS?

- 2.1 In HOU7, for Daventry District excluding the NRDA, the total projected supply is 8,544 dwellings against a requirement of 6,985. This is a surplus of 1,559 dwellings. HOU7 excludes the NRDA. It is therefore necessary to consider the Northampton Related Development Area Five Year Housing Land Supply Assessment dated April 2018 which states that the supply is 2.59 years.
- 2.2 On that basis the total supply including completions for Daventry would be:
- Daventry District excluding the NRDA - 8,544 dwellings;
 - NRDA - 3,762 dwellings.
- 2.3 This provides a total of 12,306 dwellings, which is a shortfall of 424 dwellings to that required in Policy S3.
- 2.4 As Q1 states the requirement for Daventry including the NRDA is measured separately. The introduction of the revised NPPF in 2018 and the introduction of the Housing Delivery Test has implications on how housing delivery and supply should be calculated going forward. This is because the HDT results have been published for South Northamptonshire, Daventry and Northampton individually. Therefore, in accordance with paragraph 3-063 of the PPG, the Councils have chosen to monitor their HDT on a single authority basis rather than on a joint basis. The Local Housing Need will also be measured on a local authority basis from December 2019, which is 5 years after adoption of the JCS. Therefore whilst this plan is to be considered under the 2012 Framework, for development management delivery should be measured against the total requirement for each LPA area.
- 2.5 Notwithstanding that point, with regard to how the Plan intends to support the delivery of the JCS, paragraph 4.3 of GEN03 states:

“In addition to the above, given the scale of the shortfall, 1,988 dwellings as at 1st April 2017 1,988 dwellings (NRDA in Daventry District), it is considered that this is a strategic matter that is unlikely to be resolved through the allocation of

further sites as the shortfall has arisen from the slower than anticipated delivery of allocated sites rather than there being a shortage in the supply of suitable sites. In addition it is not evident that further small scale sites would automatically deliver additional housing at a quicker rate, for example the Welford Road site was granted consent at appeal in December 2015 and as at June 2018 the site has not started."

2.6 Therefore in answer to Q1, the Plan is not intending to support the delivery of the housing requirement in the JCS or deal with the provision of additional land to demonstrate a 5 year housing land supply.

3. Question 2

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

3.1 For Daventry District, Policy S3 (Scale and Distribution of Housing Development) of the WNJCS sets an overall requirement of 12,730 dwellings to be distributed as follows:

- Daventry Town about 4,620;
- Daventry Rural Areas about 2,360; and,
- Northampton Related Development Area about 5,750.

3.2 HOU01 sets out the trajectory for Daventry District excluding the NRDA. The total projection for each site in the NRDA is in GEN03 (The Northampton Related Development Area – Part 2 Local Plan Background Paper). Table 2 (Daventry District NRDA SUE's – Predicted WNJCS delivery v revised delivery) shows that there will be a shortfall of 1,988 dwellings (5,750 minus 3,762) in the plan period. This assumes that the sites deliver as expected in the trajectory.

3.3 In HOU7, for Daventry District excluding the NRDA, the total projected supply is 8,544 dwellings against a requirement of 6,985. This is a surplus of 1,559 dwellings. HOU7 excludes the NRDA.

3.4 The Northampton Related Development Area Five Year Housing Land Supply Assessment dated April 2018 states that the supply is 2.59 years.

3.5 On that basis the total supply including completions for Daventry would be would be:

- Daventry District excluding the NRDA - 8,544 dwellings;

- NRDA - 3,762 dwellings.

3.6 As set out in answer to Q1, this provides a total of 12,306 dwellings. Therefore even if all the sites deliver as projected, there is a shortfall of 424 dwellings to that required in Policy S3.

Delivery Rates

3.7 The projected completion rates for the next 5 years for the SUEs in Daventry in the NRDA Position statement are as follows:

	2018/19	2019/20	2020/21	2021/22	2022/23
Northampton North - N3	100	100	240	240	240
Northampton West - N4	25	27	100	195	225
Northampton Kings Heath - N7	0	0	50	200	200
Northampton North of Whitehills - N8	83	50	120	120	120
Welford Road	0	10	22	0	0

3.8 We question whether the proposed delivery rates are appropriate as the SUEs are projected to delivery at least 200 homes per annum. Whilst most sites have either not started or are in the early stages, HOU11 shows that the highest level of completions off a site (Whitehills) is 108 in 2016/17 and 176 in 2017/18. Therefore the LPA will need to demonstrate why the projected level of completions will take place. Such completion rates on sites in close proximity does reemphasise the need for greater flexibilities and contingencies in the Plan which can be provided through small and medium sized sites.

4. Question 3

Is more recent monitoring information now available and does this alter the actual or forecast completion rate of dwellings against the expectations of the JCS?

- 4.1 Whilst there is an updated 5 year supply statement for Daventry (exc the NRDA) (HOU10), there is no updated trajectory for the plan period to those provided for the April 2018 base date for both Daventry and the NRDA.
- 4.2 We also note that paragraph 1.4.05 of the Plan stated that “DDC will produce a Statement for the next stages of the plan making process, leading up to the examination. It is intended that this will include the content of the Duty to Cooperate Background Paper, with appropriate updates”. We have seen no update since PSD10 or the SoCG “Being progressed jointly with Northamptonshire County Council and South Northamptonshire Council” as set out in the LPA response to the Programme Officer dated 25th February 2019.

5. 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?

- 5.1 The Plan does not include flexibility or contingencies and does not intend to assist in the delivery of plan-led development to meet Northampton's needs. This is clearly set out in paragraph 4.4 of the NRDA Background Paper (GEN03) which states:

“Consequently, neither a criteria based policy nor non-strategic allocations, alone or in combination are considered to be appropriate to be included in the part 2 Local Plan for Daventry District.”

- 5.2 We consider that in the absence of any meaningful start to a review of the WNJCS and then the time for such a review to take place, this Part 2 Plan cannot ignore such a significant shortfall and should have a policy enabling sites to come forward or allocate omission sites.
- 5.3 Allowing planning applications through development management is a position adopted by South Northamptonshire as set out in their 19th September 2018 Planning Committee, which states:

“Policy NRDA- Northampton Related Development Area-:

3.12 Policy NRDA1 has been deleted from the plan following consultation with Natural England and continued discussion with the partner Authorities. As drafted, the NRDA Policy appropriately guided development to the most optimal locations which would be considered acceptable. Effectively, it ruled out all areas to the west of the M1 and areas in Harpole and Kislingbury parishes where there are undeveloped Sustainable Urban extensions and ‘made’ Neighbourhood Plans. However, there remain significant concerns about the impact of development to the east of the M1 on highways, and infrastructure provision as well potential impacts on the Upper Nene Gravel Pits Special Protection Area.

3.13 Due to these constraints, it remains unclear as to the scale of development that the Policy could realistically deliver within the short lifespan of the policy. The review of the Part 1 Plan (the WNJCS) will commence in 2018 and it is considered that this is the most appropriate mechanism to consider the future growth needs of Northampton in a comprehensive way.

*3.14 **Officers consider that suitable sites, so far as necessary to meet the housing needs of Northampton, where they are immediately adjoining the built up area of Northampton or well related to existing, allocated Sustainable Urban Extensions (SUEs) under construction, could be brought forward through the Development Management Process.** Such sites would be required to be in conformity with WNJCS Policy S4 and set out how they contribute to meeting the vision and objectives of the WNJCS.*

3.15 The revised plan makes clear that development in the villages will continue to be considered as ‘rural’ development and SNC will proactively seek to accelerate delivery on the SUEs within its administrative boundaries. The deletion of this policy overcomes a range of concerns raised by DDC, NBC and NCC under the DfC. However, joint work to address the speed of delivery and ensure that Northampton’s housing needs can be met will continue to be a priority.” (our emphasis)

5.4 We accept that the position is not identical in Daventry as strategic sites are progressing. Nevertheless GEN03 states that there is a shortfall of 1,988 dwellings (at best) at the NRDA within Daventry. On that basis this issue cannot be left to a plan review. Indeed the plan review is some 2 years behind the timetable set by the Local Plan Inspector for the JCS, which added the following text as a Modification (MM2) for the plan to be sound:

“Delete Paragraph 3.18 and the heading above it in Section 3.0 Introduction and replace it with the following:

“Review of the West Northamptonshire Joint Core Strategy

3.18 In order to ensure that the local planning policy framework in West Northamptonshire remains up to date in the light of changing economic,

social and environmental issues and new evidence Daventry District, Northampton Borough and South Northamptonshire Councils commit to undertaking a review of the West Northamptonshire Joint Core Strategy to a plan period end date of 2036 or such longer period as the Councils choose, with

*the aim of having an adopted plan in place by 2020. This review will be led by the National Planning Policy Framework approach of objective assessment of housing, employment and other needs and the requirements of the duty to co-operate with adjoining authorities and other organisations as necessary. **This review will commence once the three Part 2 Local Plans covering West Northamptonshire have been submitted to the Secretary of State for Examination. This is expected to be in 2017.** The West Northamptonshire Local Development Scheme will be updated following the adoption of this Joint Core Strategy to reflect these anticipated timescales for the review." (our emphasis)*

- 5.5 Daventry is ahead of the two other LPAs in the JCS area, as South Northamptonshire submitted their Plan in April 2019 and the consultation on the Northampton Submission Draft commenced on 1st May 2019.
- 5.6 The latest version of the Local Development Scheme (September 2018) anticipates adoption in January 2022. Even without slippage, that is almost 3 years away and therefore the JCS review provides no solution to the immediate and pressing need for housing. A further issue that could cause delay is the proposal for Northamptonshire to have unitary status. From our experience in Cheshire East and Cornwall this had a significant bearing on the preparation of their new development plan.
- 5.7 The JCS Inspector also envisaged un-allocated sites coming forward in response to non-delivery of the SUEs. Paragraph 200 of his report states:

*"200.The housing numbers in the plan are not intended to operate as a cap or upper limit, and there are no generalised phasing restrictions on the delivery timing of any of the strategic sites, with Tables 6A and 6B of the plan acting as aids to monitoring only. Accordingly, scope exists for some strategic sites to come forward more quickly than might otherwise be the case in the event of unforeseen problems arising regarding implementation on any particular one, especially around Northampton itself. **Whilst permissions on un-allocated sites may have to be part of the response to non-delivery of some strategic sites elsewhere in the area, there is no particular reason or need for this to be specifically referred to in this policy.**" (our emphasis)*

- 5.8 Therefore our position is that there should be a development management policy to meet the serious and persistent under delivery of new homes or the allocation of omission sites. We

consider that limited development at the Primary Service Villages in close proximity to Northampton can assist. This would be consistent with the development strategy as the requirements in the WNJCS, whilst split, are not maxima and Policy S4 is clear in its locational requirements which is that development is not exclusively to be located in or adjacent to the NRDA boundary.

- 5.9 The Aylesbury Vale Local Plan Inspector (29th August 2018), which we refer to in our submissions, was clear that the plan should “*not simply abandon its function to a future review of uncertain timescale*”. In the WNJCS area the housing need is predictable and the mechanism in the WNJCS for meeting that need is clear, which is the Part 2 plans. Yet, the Part 2 plans are failing to meet that need in full and relying on a plan review with no certainty on its timing or that the need will be met.
- 5.10 It is also material to note that going forward the review of the JCS will be based on Local Housing Need. On the current methodology, the requirements for each LPA are:
- Daventry – 372 per annum;
 - Northampton – 1,333 per annum; and,
 - South Northamptonshire - 512 per annum.
- 5.11 This gives an annual local housing need requirement of 2,217 dwellings per annum which is only slightly lower than the 2,368 per annum in Policy S3. On the basis that Local Housing Need is a starting point then there is no material change to the housing need in the JCS area.
- 5.12 It is our position that the Part 2 plans in the NRDA must meet that need through sites in or adjacent to the NRDA or in sustainable settlements in close proximity, for example Moulton.
- 5.13 With Northampton being a key destination and the evidence on car use being predominant, with homes not being provided at the NRDA, providing new homes in settlements in close proximity would provide an opportunity to reduce the length of private car journeys for those working or going to Northampton as a destination. Prospective residents would have short car journeys, but also have a realistic choice for cycling and public transport. This would be consistent with the following key objectives of the WNJCS:

- reduce the need to travel, shorten travel distances and make sustainable travel a priority across West Northamptonshire by maximising the use of alternative travel modes (Objective 3); and
- To provide a range of housing in sustainable locations to ensure all residents have access to a home that they can afford and that meets their needs (Objective 11).

5.14 We proposed a policy in our representations, which was based on a development management policy in the Modifications to the North Devon and Torridge Local Plan. We have altered the geographical terms but the policy remains as drafted and the triggers can be altered:

"If monitoring identifies that the number of dwelling completions across the NRDA in a monitoring year falls below 90% of the annualised dwelling requirement, and the housing trajectory for that year indicates that the rate would not recover to an average of at least 100% for the two subsequent monitoring years, then proposals for additional residential development outside of defined settlement limits will be supported where they are:

(a) in a location and of a scale and nature commensurate to the deficit in required housing;

(b) able to demonstrate the ability to contribute in a timely manner to addressing the deficit in housing supply;

(c) broadly consistent with, not prejudicial to and contributing towards the positive achievement of the Plan's overall spatial vision and strategy for West Northamptonshire along with the relevant settlement vision and development strategy; and

(d) in all other respects in accordance with other Local Plan policies, in so far as they apply."

5.15 We therefore request that such a policy is included in the Plan.

Policy RA1

5.16 An alternative is that Policy RA1 could be amended to include a policy permitting development to meet the wider housing need in Northampton in specific villages.

Omission Sites

5.17 A further option is for omission sites to be allocated to meet the shortfall in the requirement in the development plan. Our specific interest is the land south of Boughton Road, Moulton which is addressed in Section 2 of our representations and is referred to as site PS083 in EXAM 1E would

be one such site. Our understanding from the MIQs is that omission sites are not to be discussed, however if that is not the case we would refer to our previously submitted representations on the site specifics.

Question 14 - In overall terms, would the Plan realistically deliver the dwellings required over the plan period by the JCS?

5.18 For the reasons given in answer to the Questions above, the Plan will not deliver the dwellings required in the JCS.