

Gladman Hearing Statement
Settlements and Countryside Local Plan (Part 2) for Daventry
District - Examination

Matter 3: Delivering the housing requirement over the plan
period



May 2019

MATTER 3: DELIVERING THE HOUSING REQUIREMENT OVER THE PLAN PERIOD

Issue 1: 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.

Q1. 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 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?

- 1.1.1 As is set out through the Matter 2 statement, the JCS sets out the housing requirement and spatial strategy for its delivery across the three component areas. To be consistent with the JCS the housing trajectory of the plan should clearly set out how the requirement of each of the component areas will be delivered. The Part 2 Plan does not currently include a trajectory for the NRDA component of the JCS housing requirement.
- 1.1.2 Latest available monitoring (April 2017) summarised in the NRDA Background Paper (GEN03) Table 2 and Paragraph 3.12 for the NRDA indicates that the requirement in this area will not be delivered. A failure to set out a trajectory for the NRDA component is a clear indication the Part 2 Plan is seeking to do little to ensure this area's requirement will be delivered. Not tackling this issue is a significant shortcoming of the Part 2 Local Plan and one which will need to be addressed to ensure a sound plan.

Q2. 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?

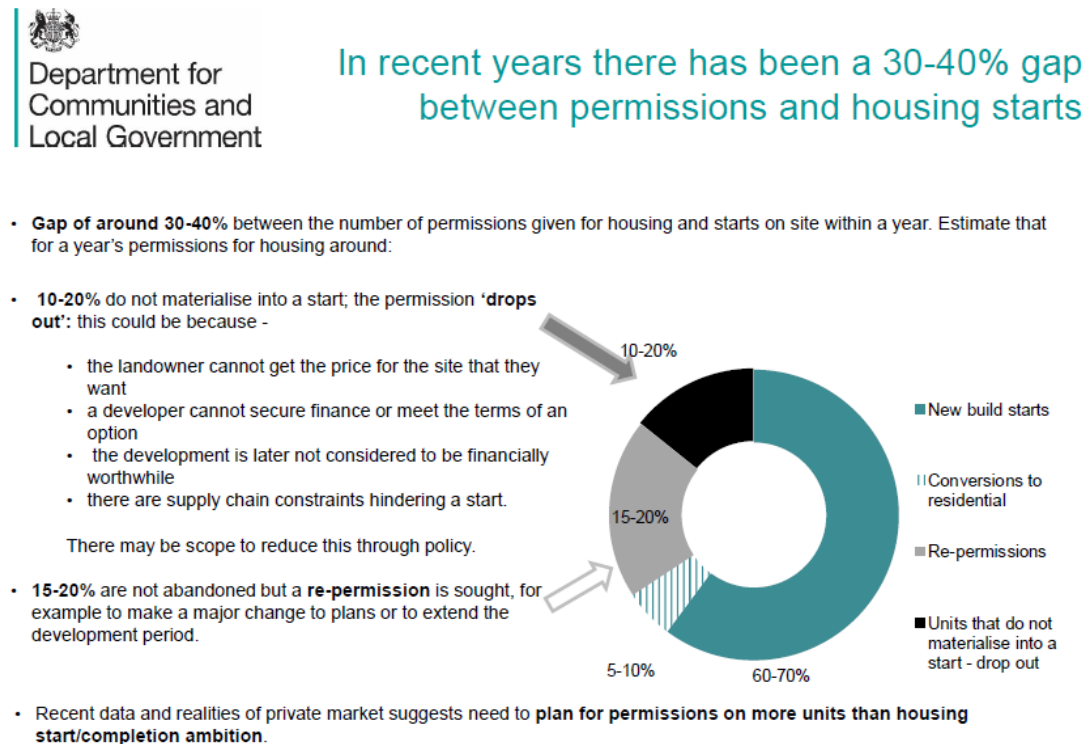
- 1.1.3 The housing trajectory only demonstrates the supply of deliverable and developable sites for the Daventry Town and Rural Areas components of the housing requirement for Daventry as set out in the housing trajectory in Appendix 3B – Daventry District Council (DDC) (Delivery & Need excluding NRDA) rather than Appendix 3A DDC (Delivery & Need) by District boundary of the adopted WNJCS.

Q3. 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?

- 1.1.4 Gladman have no comments to make on this point but would expect the Council to have up to date monitoring for all three of the component areas of the JCS housing requirement.

Q4. Is there a sufficient range and choice of sites allocated in the Plan in terms of location, type and size, to provide adequate flexibility to meet the JCS housing requirement for Daventry District? Would the housing allocations ensure that the Plan would be consistent with the Framework, in so far as it seeks to boost significantly the supply of housing?

- 1.1.5 No, there are insufficient sites within the Part 2 Plan as a whole to significantly boost the supply of housing in the short term to overcome the issues of delivery within the NRDA area of Daventry District. The Inspector into the JCS stated that non-strategic sites can be considered through the Part 2 Plans, but the Council has not sought to address this through the inclusion of mechanisms to release the scale of additional sites for development adjoining the NRDA which are required now to boost the supply of housing in this area. Instead, the Council's monitoring continues to indicate that the Daventry NRDA requirement will simply not be met in advance of a review of the Core Strategy, by 1,988 dwellings.
- 1.1.6 Similarly, the latest trajectory indicates that the requirement for the rural areas will be met with around a 50% contingency whilst Daventry Town only has an 8% contingency. It is likely that further sites will be required to meet both the Daventry Town and NRDA requirements in the remainder of the plan period.
- 1.1.7 In this regard, Gladman would wish to highlight the presentation given by the Director of Planning at DCLG at the Home Builders Federation Planning Conference in 2015. Figure 1 below shows that 10-20% of permissions do not materialise into a start on site and that the permission 'drops out'. It provides multiple reasons for this occurring and highlights a clear need to plan for the granting of permissions on more units than are required to be completed to meet housing needs. In this regard, it is recommended that the allocations within the Plan provide a clear contingency in order to increase the prospect of the minimum requirement being achieved over the plan period.

Figure 1 – Home Builders Federation Slide:-

1.1.8 In dealing with the issues around the delivery of the NRDA, Gladman have suggested two alternative options through our Matter 2 statement (Paragraphs 1.4.3 through to 1.4.10). These are the introduction of a flexible criterion-based policy mechanism or the allocation of small and medium sites adjoining the NRDA. The justification for both of these options is below.

Q9. 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's in Daventry District? Would it be necessary to consider other areas for development?

1.1.9 The Part 2 Plan currently lacks contingency for housing delivery falling below expectations and where it already has fallen below.

1.1.10 It is not appropriate to push the issues raised to a review of the JCS. The JCS was adopted in December 2014 and will become 5 years old in December 2019 by which point under the new Framework it should have been reviewed. In Paragraph 3.17 of the adopted JCS the Council's all agreed a commitment to review the JCS with a target of submission for examination by 2020, this is well behind schedule and therefore a review should not be relied upon as a contingency measure. Instead, it is necessary to consider the options Gladman have presented in rectifying issues around housing delivery.