



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

STATEMENT ON BEHALF OF:

Intro Crowd

**MATTER 3: Delivering the Housing Requirement over the Plan
period**

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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.

Questions

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?*
 - 1.1 A Housing Trajectory is included as Appendix J in The Submission Draft Plan. The Housing Background Paper (HOU1) includes the same trajectory with additional rows providing the JCS trajectory for Daventry District outside the NRDA and the annual and cumulative surplus/deficits against that requirement.
 - 1.2 The trajectory does not set out the position in relation to housing requirements within Daventry and as set out in the JCS including that part of the NRDA within the district and is therefore incomplete.
 - 1.3 As set out in response to Matter 2, in the absence of a complete trajectory, it is difficult to see how the plan meets the spatial principle set out at Policy SP1 to assist with the delivery of plan-led development to meet Northampton's needs where this cannot be accommodated in the NRDA.
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. *Is more recent monitoring information now available and does this alter the actual and forecast completion rate of dwellings against the expectations of the JCS?*

- 3.1 For the period 2011-2018, the Housing Trajectory shows that there were 1,826 completions in the rural area which make up approximately 70% of the completions for that part of Daventry District outside the NRDA. For the remainder of the plan period from 2018 to 2029, development in the rural areas will make up some 30% of the expected overall provision. The trajectory shows development in the rural settlements has made an important contribution to meeting strategic housing requirements in the first part of the plan period. This has involved suitable housing development in the more sustainable Primary and Secondary Service Centres.
- 3.2 The plans strategy for the rural areas means that this source of housing supply will be restricted in the latter stages of the plan period, with development within the rural areas restricted to windfall sites from 2023.
- 3.3 Whilst the trajectory indicates a surplus of 1,559 dwellings against the JCS requirement for that part of the district outside the NRDA, this is reliant on a significant step change in build rates on sites around Daventry Town, including from the proposed additional sustainable urban extension at Daventry South West which is expected to deliver some 800 dwellings by 2029. In relying on delivery from two strategic sites at Daventry and restricting further housing development in the rural areas there is a significant risk that delivery of the strategic housing requirement could be compromised if the build rates expected from the sustainable urban extensions are not achieved.
- 3.4 In terms of available data, the Council has published a Housing Land Availability Report, April 2019 (HOU10). This includes a five-year land supply assessment but does not provide an updated housing trajectory for the plan period. If more up-to-date information is provided, we reserve the right to make further submissions on any new housing data as necessary.
4. *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?*
5. *Are the sites that are relied upon for the supply of housing in rural areas – deliverable and/or developable? What evidence is there to support this?*

- 5.1 As a result of the restrictive approach to further development in the rural areas, for the last 6 years of the plan period, development in the rural areas would be limited to windfall site release, and some 82% of completions will be from sites around Daventry Town which is shown by the Housing Trajectory. The plan will therefore be reliant on delivery from a limited number of larger sites focused on Daventry Town. This will not provide for a sufficient range or choice of sites and will limit the flexibility of the plan to deal with changing circumstances. This approach is considered to be inconsistent with the aim of the NPPF 2012 to boost significantly the supply of housing.
- 5.2 The approach of the plan is short-sighted in seeking to address under delivery from the strategic site allocation at Daventry North East by allocating a further large sustainable urban extension to the south west of Daventry. This approach will require annual completions at Daventry Town well in excess of build rates achieved in the past.
- 5.3 It is our submission that the plan should provide further flexibility through the allocation of additional sites in the more sustainable rural settlements or alternatively identify reserve site allocations that can be brought forward as required.
- 5.4 IntroCrowd has interest in land to the east of Nene Side Close, Badby. Approximately 0.85 hectares of the site is located outside of the area at risk from flooding and has the potential to deliver approximately 25 dwellings.
6. *Is the expected contribution from windfalls, as included in the housing trajectory for both Daventry Town and rural areas, realistic and justified by evidence?*
7. *Is it appropriate to apply a lapse rate of 20 dwellings per annum from 2018/19 onwards as set out in the housing trajectory for planning permissions or neighbourhood plan allocations in rural areas? Is such an approach justified by evidence?*
8. *Are the neighbourhood plan allocations that are identified in the housing trajectory consistent with those within made neighbourhood Plans? If not, what certainty is there that any further allocations will be part of a made neighbourhood plan?*
- 8.1 The Housing Trajectory included at Appendix J of the Submission Plan includes an annual windfall of 17 dwellings a year for Daventry Town, and

86 dwellings a year for the rural areas, both from 2020- an annual total of 103 dwellings. The Housing Land Supply report 2019 (HOU10) provides evidence of previous windfall completions for Daventry Town and the Rural Areas for the last 10 years. This evidence shows an average annual windfall completion rate excluding garden land of 93 dwellings (18 dwellings a year for Daventry Town and 75 dwellings a year for the Rural Areas). This would suggest that the assumptions on windfall provision, particularly for the Rural Areas is overstated.

8.2 The NPPF in paragraph 69 states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply.

8.3 As explained in our submissions on Matter 2, the tightly defined settlement limits for the rural settlements will mean that opportunities for further infill development are likely to be restricted. The settlement boundary contained within the Local Plan for Badby differs from that shown in the Badby Neighbourhood Plan (NP). The NP excludes the existing dwellings on Nene Side Close whilst the Local Plan includes them. The Part 2 Local Plan definition of the existing settlement limits represents a more appropriate definition reflecting existing development on Nene Side Close which forms part of the existing settlement form.

8.4 In terms of a lapse rate, the approach is considered to be reasonable and is supported by evidence as set out in the Housing Land Availability Report, 2019.

8.5 The trajectory for the Rural Areas includes one Neighbourhood Plan allocation without permission at West Haddon. In terms of future Neighbourhood Plan allocations, there is no incentive for Neighbourhood Plans to make allocations when the Part 2 Local Plan Strategy is to make no further provision in the rural areas. It cannot therefore be assumed that additional housing will come forward through Neighbourhood Plans.

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

9.1 There are no specific contingencies included in the plan to address potential shortfalls in delivery. Policies RA1-RA3 refer to 'exceptional

circumstances' where development outside settlement confines will be considered, including where housing supply is less than five years. The plan should take a more positive approach through the allocation of additional sites in the more sustainable rural settlements to both provide a wider range of development opportunities and greater flexibility. Alternatively, the plan should identify reserve sites that could come forward as and when required. Paragraph 77 of the NPPF states that in rural areas, planning policies should be responsive to local circumstances and support housing developments that meet local needs, and paragraph 78 states planning policies should identify opportunities for villages to grow or thrive, especially where this will support local services.

10. *Are the approaches to self-build and custom housebuilding in Policy HO5, rural workers dwellings in Policy HO6 and rural exception site selection in Policy HO7, justified, effective and consistent with national policy?*
11. *Is Policy HO8 justified and consistent with national policy, with respect to the specific requirements relating to market housing, affordable housing, housing standards and specialist accommodation?*
12. *Is there any evidence that any of the policy requirements on Policy HO8 would affect the viability or deliverability of housing sites? Is the policy sufficiently flexible? Would it allow for specific circumstances, including viability to be taken into account?*
 - 12.1 Policy HO8, in response to submitted representations on the Submission Draft Plan has been changed slightly, however, the policy remains over prescriptive and inflexible in its approach to the provision of housing mix on sites. The policy applies specific percentage requirements to be provided on every housing site for both market and affordable housing and inevitably there will be site specific circumstances that would dictate and alternative approach to housing mix. The housing mix should be expressed as an overall district-wide target to guide negotiations on specific sites. The policy should be amended to provide indicative percentage ranges to guide site negotiations responding to local demand.
13. *Are the recommendations of the viability assessment (GEN01) reflected in the plan?*
14. *In overall terms, would the Plan realistically deliver the dwellings required over the plan period by the JCS?*

14.1 As outlined above, the plan is over-reliant on ambitious delivery rates from larger housing sites around Daventry Town which does not provide for a range and choice of sites or the flexibility to deal with lower than expected delivery rates. The plan should take a more flexible approach through the inclusion of additional allocations in the more sustainable rural settlements.

14.2 IntroCrowd are actively promoting a site to the east of Nene Side Close, Badby which is a logical extension to the Badby Settlement and is capable of providing up to 25 dwellings

Issue 2:

Whether the proposed allocation of sites and site selection accords with the JCS and is consistent with national policy.

Questions

1. *Was the methodology used to assess and select the proposed site allocations appropriate? Were reasonable alternatives considered and tested?*
2. *Are the reasons for selecting the preferred sites and rejecting alternative sites, clear and consistent? Is there a reason why sites where the SA identified significant negative effects such as Daventry South West (HO1) were selected, whereas others were not?*
3. *Have any potential effects of the proposed site allocations on the predicted annual delivery rate of housing at the Daventry North East Sustainable Urban Extension (JCS allocation) and/or the NRDA's been adequately considered? What is the current situation with respect to those sites allocated in the JCS?*
 - 3.1 As set out in our representations on the Submission Plan, the Council ruled out the consideration of additional housing provision in the rural areas as a reasonable alternative on the basis that the spatial distribution was set in the JCS. In our view, Policy S6 of the JCS dealing with monitoring and review, allows for issues of delivery to be addressed through local plans. The Council should not have ruled out the consideration of additional provision in the rural areas as a reasonable alternative to address shortfalls in delivery at Daventry Town.
 - 3.2 Ruling out growth within the rural areas meant that the Council has limited itself to the identification of additional sites around Daventry Town and did

not consider alternative distribution options as an approach to addressing shortfalls and providing for additional flexibility in housing provision.

3.3 The overly restrictive approach to further development in the rural areas means that the plan has limited flexibility and does not allow for any further provision in the more sustainable rural settlements in the remainder of the plan period to 2029. Additional provision in the rural areas is a reasonable alternative that should have been properly considered.

3.4 IntroCrowd are actively promoting a site located to the east of Nene Side Close which is a logical extension to the Badby Settlement, is available and capable of delivering approximately 25 dwellings.