



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

**STATEMENT ON BEHALF OF:
MILLER HOMES– Respondent Reference PS058**

**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?*

- 3.1 The Submission Draft Plan includes a Housing Trajectory at Appendix J. The Housing Background Paper (HOU1) includes the same trajectory but with additional rows providing the JCS trajectory for Daventry District outside the NRDA and the annual and cumulative surplus/deficits against that requirement.
- 3.2 The trajectory is therefore incomplete as it does not set out the position in relation to housing requirements for Daventry as set out in the JCS including that part of the NRDA falling within the district.
- 3.3 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?*
- 3.4 The Housing Trajectory shows that, for the first part of the Plan period from 2011-2018, there was a total of 1,826 completions on the rural area,

making up some 70% of completions for that period 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.

3.5 The strategy of the plan for the rural areas means that this source of supply will be restricted in the latter part of the plan period, with development in the rural areas being limited to windfall sites from 2023.

3.6 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. There is a risk that in relying on delivery from two strategic sites at Daventry and restricting further housing development in the rural areas, delivery of the strategic housing requirement could be compromised if the expected build rates for the sustainable urban extensions are not achieved.

3.7 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?*

3.8 The Housing Trajectory shows that, 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. This approach means that the plan is over-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.

3.9 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.

3.10 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.

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?*

3.11 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.
- 3.12 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.
- 3.13 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.
- 3.14 It is understood that the trajectory for the Rural Areas only 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?*
- 3.15 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.
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?*
- 3.16 Despite some changes to Policy HO8 in response to representations on the Submission Draft Plan, the Policy remains overly prescriptive in its approach to the provision of housing mix on sites. The policy remains unnecessarily inflexible in applying specific percentage requirements to be provided on every housing site for both market and affordable housing.
- 3.17 There will inevitably be site specific circumstances that would justify an alternative approach to mix. The 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.
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?*
- 3.18 As outlined above, the plan is over-reliant on ambitious delivery rates from larger housing sites around Daventry Town. This 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.

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?*
- 3.19 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.
- 3.20 This approach meant that the Council 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.
- 3.21 Additional provision in the rural areas is a reasonable alternative that should have been properly considered. 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.