
Matter 4 Issue 2

Employment Land

Daventry Settlements and Countryside Local Plan
Examination

1. Issue 2: Whether the approach to the supply and delivery of employment development is justified, effective and consistent with national policy and the JCS.

1.1. **1. What is the basis for the approach to employment development and the strategy for economic growth set out in the Plan? Is it consistent with national policy and the JCS? Is the approach justified and effective?**

- 1.1.1. The basis for the approach to employment development is unclear. There is no defined net job growth target. There is no B Class development floorspace or site area target. There is a specific need identified by the DSMU for sites for small and medium units to be developed at Crick allied to the growth of DIRFT which has been consciously ignored by the Plan. There is reliance upon DIRFT 3 to meet a substantial proportion of the jobs requirement for West Northamptonshire without acknowledgement that many of those jobs at DIRFT will be taken by employees from outside the area (JCS 8.19). There is no account taken of how many DIRFT jobs will be taken by or available to Daventry District residents. The restriction on expansion of any settlements in the Rural Area or other development outside settlements works against Daventry District capitalising upon one of its key assets as acknowledged by Objective 6, which is its economic advantage borne out of its strategic location relative to centres of population and the strategic transport network. These features direct employment development to a specific location around M1 J18 where policies of the Plan (RA1 and RA6) conspire to prevent positive economic growth
- 1.1.2. NPPF 17 requires “every effort” to be made to objectively identify and then meet business needs, and to respond to the wider opportunities for growth. NPPF 17 also requires plans to take account of market signals and to take account of the needs of business communities.
- 1.1.3. DSMU 3.76 confirms that M1 J18 has been suggested by agents as well as the developer promoting the land. The market sentiment reported is that development of units up to 10,000sqm is viable in this location. The conclusion of DSMU at 3.79 is that if land for units of up to 10,000sqm is provided by the planning system, it will be developed and occupied.
- 1.1.4. The approach of the Plan to employment development is not consistent with national policy and its consistency with the JCS is unclear. The approach is not justified and is not effective.

1.2. 3. Is there a suitable range and choice of proposed employment site allocations, in terms of location, type, quality and size, to address the particular characteristics, roles and functions of areas of Daventry District, including the storage and distribution centre of national significance at DIRFT, and to meet the requirements of the JCS? Is there a suitable range ?

- 1.2.1. There is a lack of clarity what the overall quantum of employment development being planned for is, and whether that is sufficient to meet identified needs for employment growth.
- 1.2.2. There is an identified need for small and medium sized units (up to 10,000 sqm) to be provided at Crick, which includes demand from suppliers and service providers who support the large scale occupiers at DIRFT. The findings of the DMSU (3.83) in this regard do not seek to limit the opportunity at Crick just to those occupiers linked to DIRFT, as the conclusion is that the demand in this location “includes” such occupiers. This acknowledges that there is additional demand for employment development at Crick from occupiers not linked to DIRFT.
- 1.2.3. The unique economic advantage of the strategic location of Daventry is acknowledged at Objective 6. The optimal location relative to the centres of population and the strategic transport connections for employment development is at M1 J18 / Crick.
- 1.2.4. As noted in the response to Matter2 Q1, the DMSU 3.78 reports that “there is substantial demand for additional small to medium units in Daventry which is frustrated by an almost total lack of supply. There is very little space currently available, virtually no outstanding planning permissions and no land currently allocated for further development”. DMSU 3.83 states most land should be in Daventry, but provision should also be made at Crick. The recommendations of DMSU 3.85 are to allocate land free of physical constraints, such as contamination, bad ground conditions or inadequate infrastructure. Land at J18 ? Crick meets those requirements.
- 1.2.5. At present a specific need which has been identified is not being planned for. That need should be positively planned for.

1.3. 4. Is Policy EC4 otherwise positively prepared, justified, effective and consistent with national policy and would it be sufficiently flexible to allow for alternative uses where appropriate?

1.3.1. EC4 is restricted to supporting development within the boundaries of Strategic Employment Areas identified on the Inset maps only. The scope of the policy is too restrictive and narrowly constructed in this regard. There is a strategic need to support significant jobs growth, a need to address the current relative underperformance of Daventry District in this regard (see PS106 Matter 1 statement), and a need for the Plan to support the objectives of RA1 to improve access to employment opportunities. In order to meet these needs, it is necessary for EC4 to be more positively framed and to support the expansion of the Strategic Employment Areas beyond their existing boundaries.

1.4. 6. Was the methodology used to assess and select the proposed site allocations appropriate? Were reasonable alternatives considered and tested?

1.4.1. Methodology and testing process adopted by Council in respect of employment sites is unknown.

1.5. 7. Are the reasons for selecting the preferred sites and rejecting alternative sites, clear and consistent?

- 1.5.1. No. The rejection of omission sites at M1 J18 (PS106A (116) and PS106B (117) is for reasons that are entirely unclear, as the sites are the most suitable to meet the identified need identified by the DMSU in terms of location relative to the strategic transport network, location relative to DIRFT where development can support the expansion of DIRFT, and location relative to Crick where development can improve local access to employment, reduce the need to travel and deliver the objectives of RA1.
- 1.5.2. The assessment of these sites set out at Exam 1E confirms that they are not best quality agricultural land, there are no infrastructure requirements or issues, and there are no impediments to development identified. The identification of small parts of each site in flood zone 3 are not material to the development potential of the sites as a whole. The existing use is identified as agricultural, but in the case of PS106a (116) this fails to acknowledge that the site is primarily a location for two large wind turbines. In the case of PS106B (117) there is no acknowledgement that part of the site is currently occupied as a works depot by Highways England, it provides access to further large scale wind turbines to the north, and that an estate road into the site for commercial development already exists from Strategic Employment Site EC4e from Dockham Way.
- 1.5.3. It is also notable that the PS106A and PS106B are afforded no special protection or importance by the made Crick Neighbourhood Plan.

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