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1 INTRODUCTION

1.1 Background

1.1.1 This representation is made by Gladman Developments Limited (Gladman). Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure and has land interests in West Northamptonshire, including sites within Daventry District.

1.1.2 Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, it understands the need for the planning system to provide local communities with the homes and jobs that are needed to ensure that residents have access to the homes and employment opportunities that are required to meet the future needs of the area and contribute towards sustainable economic development.

1.1.3 Gladman has been involved in contributing to the plan preparation process across the UK and through the submission of representations and participation at local plan public examinations. It is on the basis of that experience that these representations have been prepared.

1.2 Overview

1.2.1 The West Northamptonshire Joint Core Strategy (WNJCS) sets out the long-term vision and objectives for the boroughs of Northampton, Daventry and South Northamptonshire from 2011 until 2029, including setting a housing target for the urban and rural areas.

1.2.2 The emerging Settlements and Countryside Local Plan Part 2 for Daventry District (DLPP2) intends to build upon the policies of the WNJCS. On adoption, it is also expected to replace all of the remaining saved policies of the 1997 Daventry District Local Plan. This consultation relates to an emerging draft version of the DLPP2 and has been published for consultation under Regulation 18 from Monday 27th November 2017 until Friday 26th January 2018.

1.2.3 The consultation document also proposes to supersede elements of the adopted WNJCS. This would be limited to the geographical area of Daventry District and is intended to relate to the ‘Spatial Strategy for Rural Areas’ (set out within WNJCS Policy R1) and ‘Provision for Gypsies, Travellers and Travelling Showpeople’ (set out within WNJCS Policy H6).

1.3 Structure of Representations

1.3.1 These representations are structured to cover a number of key topic areas as well as the specific policy proposals contained within the consultation draft, namely:

- The Housing White Paper, February 2017
1.3.2 Gladman has a number of land interests in Daventry District, which are being promoted for inclusion within the local plan as residential site allocations:

- Land at Holly Lodge Drive, Northampton
- Land at New Street, Weedon
- Land at Brington Road, Long Buckby

1.4 Plan Making

1.4.1 The Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
• **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

• **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
2 FIXING OUR BROKEN HOUSING MARKET – WHITE PAPER
FEBRUARY 2017

2.1 Overview

2.1.1 The Government is in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.

2.1.2 Average house prices are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.

2.1.3 The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. The consensus is that we need at least 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.

2.1.4 Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that ‘the housing shortage isn’t a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.’

2.1.5 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haves and have-nots.

2.1.6 The challenge of increasing supply cannot be met by Government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.

2.1.7 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.

2.1.8 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, and this allocations document represents an important policy tool to ensure local needs are met in full.

2.1.9 Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every five years. An authority will also need to update its plan if its existing housing target can no longer be justified against its objectively assessed housing requirement.

2.1.10 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are...
opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.

2.1.11 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to afford to live where they grew up. It is clear that improving the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.

2.1.12 Finally, the Government has made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.

2.1.13 The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of houses in the right places. Local plans therefore need to consider these policy intentions now in order to ensure that it fulfils the Government’s agenda and provides the homes that its local communities need.

2.1.14 More recently, in October 2017, the Prime Minister reaffirmed the Government’s commitment to addressing the broken housing market by bringing forward measures to boost home ownership and housing supply, stating:

"I will dedicate my premiership to fixing this problem – to restoring hope. To renewing the British Dream for a new generation of people. And that means fixing our broken housing market."

"For 30 or 40 years we simply haven’t built enough homes. As a result, prices have risen so much that the average home now costs almost 8 times average earnings. And that’s been a disaster for young people in particular."

2.1.15 Furthermore, in a message to housebuilders, the Prime Minister indicated that:

"We, the government, will make sure the land is available. We’ll make sure our young people have the skills you need. In return, you must do your duty to Britain and build the homes our country needs."

2.1.16 The Autumn Budget 2017 brought further details of the Government’s commitment to building a Britain that is ‘fit for the future’. A prominent feature of this is tackling the housing crisis, with housebuilding featuring prominently amongst the Chancellor’s announcements, indicating that:
“The Government is determined to fix the broken housing market, and restore the dream of home ownership for a new generation.”

2.1.17 The affordability of housing for young people is a key challenge for the Government, and whilst it is recognised that there is no ‘single magic bullet’ to solve the housing crisis, the Government is actively seeking to tackle obstacles standing in the way of first-time buyers. The Government sees a ‘big step up’ in new house building as an important element in its strategy to address the acute affordability problem and has set a goal to build 300,000 homes a year by the mid-2020s.

2.1.18 The vital importance of housing to the economic success of our cities and regions is also highlighted in the Government’s “Industrial Strategy: building a Britain fit for the Future”, November 2017. This includes reference to the introduction of planning reforms that will ensure more land is available for housing, and that better use is made of underused land in our cities and towns. It also sets out the challenge to raise housing supply to 300,000 per year before the end of the current Parliament. The Government wants to support places with ambitious and innovative plans to build additional homes where they are needed, and those which will support wider economic growth. Furthermore, the Government wants to support greater collaboration between councils, a more strategic approach to the planning of housing and infrastructure, more innovation and high quality design in new homes and the creation of the right conditions for new private investment.
3 LEGAL COMPLIANCE

3.1 Duty to Cooperate

3.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. If a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

3.1.2 Whilst Gladman recognises that the Duty to Cooperate is a process of ongoing engagement and collaboration as set out in the PPG, it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Daventry District Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues. This is not simply an issue of consultation, but also a matter of effective cooperation.

3.1.3 It is noted that Daventry District Council intends to take the opportunity to move away from elements of the adopted WNJCS. This decision will need to be carefully managed in the context of the Duty to Cooperate and Sustainability Appraisal. Furthermore, the scope of this particular Development Plan Document will need to be clearly explained in order for any associated issues of legal compliance or soundness to be explored as the DLPP2 is further developed.

3.1.4 The Emerging Draft Consultation Document provides an overview on the duty-to-cooperate and makes reference to the issue of housing delivery. This is further explored through the Council’s Duty to Cooperate Background Paper. The Paper highlights a number of potentially significant cross boundary issues and it is therefore essential that these matters are further explored through effective joint working as the plan making process progresses. In particular, the Background Paper indicates that it is a key requirement for the DLPP2 is to ensure delivery of development. The Background Paper also confirms that concerns exist with regards to the ability of the West Northamptonshire authorities to deliver in full against the housing needs of the HMA as a whole. This is as a result of the Sustainable Urban Extensions that were allocated for the Northampton Related Development Area (NRDA) delivering at a slower rate than had been anticipated by the West Northamptonshire authorities at the time that the WNJCS was examined. This is a matter that must be thoroughly considered through the duty to cooperate and then addressed through

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1 PPG Reference ID. 9-011-2014036
2 Paragraph 1.4 - Settlements and Countryside Local Plan (Part 2) for Daventry District Emerging Draft Consultation
3 Daventry District Council, Duty to Cooperate Background Paper Version 1- November 2017
policies that will ensure that effective part 2 local plans are put in place across the area that is covered by the WNJCS.

3.2 **Sustainability Appraisal**

3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in local plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.

3.2.2 The DLPP2 must ensure that the results of the SA process clearly justify all policy choices, including the need to consider options for development and growth against ‘all reasonable alternatives’. The Council’s decision making and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often the SA process flags up the negative aspects of development, whilst not fully considering the positive aspects which can be brought about through new opportunities for housing and employment generating development.
4 SETTLEMENTS AND COUNTRYSIDE LOCAL PLAN PART 2

4.1 NP1 – Community Led Neighbourhood Development Planning

4.1.1 Policy NP1 relates to the preparation of neighbourhood development plans (NDPs) in Daventry District. The intention of the Council to set out its role in assisting groups preparing NDPs within a policy of the local plan is to be welcomed. Whilst there is no requirement for communities to prepare NDPs, where they choose to do so, the inclusion of a related local plan policy provides the opportunity for the local planning authority to set out a proactive, positive and collaborative approach to working with qualifying bodies that wish to prepare them.

4.1.2 The inclusion of a policy relating to NDPs provides the opportunity for the local planning authority to support the preparation of positively framed NDPs within its area and enable them to contribute towards the delivery of sustainable development. It will also provide the opportunity for the local planning authority to align with the requirements of the Neighbourhood Planning Act 2017 (Commencement No 3) Regulations.

4.1.3 The clarification that is provided within NP1(ii) and Appendix F with regards to the strategic policies of the Local Plan is noted and has the potential to provide a greater degree of certainty to qualifying bodies on which policies their NDPs must be in general conformity with if they are to meet the related NDP basic condition.

4.1.4 The draft policy includes NP1(iii), which highlights that NDPs can provide for more development than set out in the WNJCS. This policy should however go further by making it clear to communities that all settlements can play a role in delivering sustainable development and that additional sites to those in a Local Plan can be included within NDPs where this is supported by evidence to demonstrate need above that identified within the Local Plan⁴.

4.1.5 NP1(v) sets out that all neighbourhood plans should include proposals for monitoring and review. Recognition should also be given here to the need to provide sufficient flexibility within NDPs to ensure that development which is sustainable can come forward without delay in accordance with the presumption in favour of sustainable development.

4.1.6 The proposed policy should also be complemented by the Council’s Statement of Community Involvement (SCI), which should then be regularly updated so that it provides up-to-date guidance to groups seeking to prepare and implement NDPs. It is noted that the Council has developed content on its website to assist in this process and it is essential that this is maintained to ensure that any changes to guidance are reflected, particularly the emerging regulatory changes that

⁴ Planning Practice Guidance Paragraph: 044 Reference ID: 41-044-20160519

### 4.2 Presumption in Favour of Sustainable Development

**4.2.1** Section 1.8 of the Draft Plan relates to the Presumption in Favour of Sustainable Development and includes an explanation of the purpose of Paragraph 14 of the National Planning Policy Framework in a generalised fashion.

**4.2.2** In bringing forward individual Part 2 Plans across West Northamptonshire, the local planning authorities of Daventry, South Northamptonshire and Northampton will need to ensure that the ‘Presumption in Favour of Sustainable Development’ continues to operate in accordance with WNJCS Policy SA. In particular, the policy approach taken forward by Part 2 Plan(s) should provide sufficient flexibility in order to enable the policies of the development plan as a whole to be positively responsive to changing circumstances during the plan period. It is therefore important that policies are included that support the delivery of development in sustainable locations to meet objectively assessed needs across the HMA in full over the whole plan period, whilst maintaining a rolling five year supply of housing land.

**4.2.3** Gladman wish to raise a concern that the emerging DLPP2 appears to move away from the presumption in favour of sustainable development that is required by the Framework and Policy SA of the WNJCS.

**4.2.4** The WNJCS is founded on a strategy that relies on the delivery of housing from several large scale urban extensions to Northampton and Daventry. Indeed, the baseline housing trajectory for the WNJCS relied upon early and sustained delivery from these strategic sites over the plan period to secure a rolling five year housing land supply.

**4.2.5** The WNJCS makes clear that “Daventry District, Northampton Borough and South Northamptonshire Councils will work proactively to ensure planning is not a barrier to new development”\(^5\). However, as currently drafted, there is no mechanism included within the DLPP2 to provide the flexibility that is needed to enable a positive response to rapid change that is required by paragraph 14 of the Framework. Further flexibility is required to allow for development to be brought forward to meet housing needs without delay, for example to mitigate the impact of lower than expected delivery rates across the suite of large scale sites upon the overall housing trajectory. Whilst the DLPP2 provides a broad update on the progress of the SUEs\(^6\), in particular noting that planning applications have been submitted for SUEs within Daventry District, a number of other issues must be taken into account such as the determination period for outline applications, legal agreements, reserved matters applications, discharge of pre commencement conditions, site preparation and

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\(^5\) Paragraph 5.4, West Northamptonshire Joint Core Strategy

\(^6\) Paragraph 1.4.04, Daventry Settlements and Countryside Local Plan Part 2 (November 2017),
the construction of site enabling infrastructure. The strategy is therefore inevitably susceptible to changes in circumstance that can occur in relation to the delivery of large scale and complex development proposals of this nature.

4.3 **Vision and Objectives**

4.3.1 The Plan includes a spatial portrait of the area which focuses on issues including the plan area, population, housing, the economy, transport and the environment. In relation to housing, it is important that the plan remains responsive to the needs of rural areas and careful consideration will therefore need to be given to the preparation of policies that enable a continual pipeline of sustainable development to come forward in these areas over the remaining 12 years of the plan period.

4.3.2 The WNJCS requirement for Daventry District’s rural areas of 2,360 is not expressed as a maximum figure. It is therefore important that an effective mechanism is included within the Plan to ensure that additional market and affordable housing can be supported in a manner that is responsive to needs in these areas. It will also be necessary to ensure that the Plan reflects the fact that development may not all be able to be accommodated within the current confines of a settlement and that opportunities exist for sustainable forms of development beyond the current settlement edge.

4.4 **SP1 - Daventry District Spatial Strategy**

4.4.1 The WNJCS set out the housing delivery trajectory over the period 2011-2029. Following the adoption of the Plan, there has been slippage from the initial delivery rates that were predicted and it has not therefore been possible to maintain a rolling five year housing land supply across the WNJCS area, specifically within the Northampton Related Development Area (NRDA). It is essential that the District’s spatial strategy operates within the context of the presumption in favour of sustainable development and for any principles that are established through this policy to be consistent with national policy through positively framed drafting that ensures that a suitably balanced approach is taken in applying the objectives that the Council is seeking to establish.

4.4.2 The Plan must include sufficient flexibility over its lifetime. Indeed a current example of the need to make positive responses to support the delivery of housing is the continued inability to demonstrate a five year housing land supply for the Northampton Related Development Area (NRDA) which is an area that extends beyond the administrative boundaries of the Town into the districts of Daventry and South Northamptonshire. The NRDA’s housing land supply has deteriorated in recent years, with a 3.10 year supply reported at April 2016 for the period 2016/17-2020/21 and a 2.95 year supply reported at April 2017 for the period 2017/18 to 2021/22.

4.4.3 As a result of the current land supply position, there is an urgent and pressing need for the Plan to respond to the rapid change that has occurred since the examination of the WNJCS, by embracing
a positive approach to meeting the needs of the NRDA. Paragraph 14 of the Framework requires plan makers to ensure that local plans meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. It is therefore important that the Daventry District Spatial Strategy that is put in place through Policy SP1 provides an appropriate basis for responding to this issue. This can be achieved in a plan led manner by supporting the release of sites in sustainable locations to assist in meeting the needs of the NRDA. As presently drafted, Policy SP1(B) fails to include a mechanism to release sites to support the delivery of much needed housing that is required now to meet the needs of the NRDA and is therefore considered by Gladman to be inconsistent with the Framework’s presumption in favour of sustainable development. In this regard, Gladman would wish to highlight to Daventry District Council that a positive mechanism to release sites to support the needs of the NRDA is proposed within the emerging Part 2 Local Plan in South Northamptonshire in a manner that is consistent with the WNJCS.

4.4.4 Policy SP1(E) seeks to protect and enhance existing services and facilities within the District’s villages by allowing ‘limited development’ to meet their identified housing needs. It is not clear from this statement of policy as to what is meant by ‘limited’ in this context, or how the Council will identify the housing needs of individual settlements to meet the requirement of this policy. Furthermore, the policy should not be limited to existing services and facilities and should look to pro-actively support opportunities for new services and facilities to be established. The Plan should not create a sustainability trap whereby smaller and rural communities are considered as unsustainable in principle. The Plan at present contains no mechanism by which a settlement that is assumed to function at a lower level within the hierarchy can migrate up the sustainability ladder. Paragraph 55 of the Framework requires local planning authorities to promote sustainable development in rural areas where it will enhance and maintain the vitality of rural communities and it is therefore considered important for an enabling approach to be embedded in the strategy that is contained within DLPP2.

4.5 Development in the Rural Areas

4.5.1 Gladman wish to raise concerns with regards to the manner in which the WNJCS’s broad figure of “about 2360 dwellings in the rural areas” is being applied within the emerging DLPP2. Paragraph 5.1.02 of the consultation document correctly indicates that the figure contained within the WNJCS is not a ceiling, however it goes on to suggest that it is a crucial figure in underpinning the overall spatial strategy contained within the WNJCS. Gladman would suggest that flexibility is needed to ensure that the Council can respond positively to opportunities for sustainable development at settlements that are defined within the plan as being within the rural area. The claim that further sustainable growth in the rural settlements would unduly impact upon the spatial strategy contained in the WNJCS is considered to be unfounded. Indeed, the WNJCS Inspector’s Report

Chapter 9, Housing to meet the Needs of Northampton, South Northamptonshire Local Plan Part 2: Pre-submission Draft for Consultation, September 2017
highlighted at paragraph 163 that Part 2 plans will consider all relevant local circumstances and the realistic capacity of suitable sustainable sites in respect of the provision of rural housing to bolster that coming forward in and around the towns.

4.5.2 Local Plans face the challenge of ensuring that they promote sustainable development throughout their areas and Paragraph 55 of the Framework establishes the need to enhance or maintain the vitality of rural communities. This is an important challenge and must be considered carefully through the Council’s proportionate evidence base. It will require the need to establish an effective baseline of facilities and services together with a vision for how they can be maintained or improved. Rural settlements of varying sizes can make a meaningful contribution towards meeting overall housing needs in a sustainable manner. No settlement should be placed in a sustainability trap whereby it is not able to improve the range of services and facilities available to residents that would allow it to escalate up the sustainability ladder.

4.5.3 In terms of villages and rural areas, Section 3 of the Framework sets out that planning policy should support economic growth to create jobs and prosperity by taking a positive approach to sustainable new development. The Framework states that local plans should promote the retention and development of local services and community facilities, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. Paragraph 55 of the Framework states that “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.” The PPG provides further detail on how planning policy can support sustainability and vitality. The PPG references the importance of recognising the particular issues facing rural areas in terms of housing supply and affordability and the role of housing in supporting the broader sustainability of villages and smaller settlements. It also states that it is important for local planning authorities to recognise the particular issues that are facing rural areas in terms of housing supply and affordability. Rural housing is highlighted as being essential to ensuring the viable use of local facilities and the role of housing in supporting the broader sustainability of rural settlements is also an important consideration for plan makers. All settlements can play a role in delivering sustainable development in rural areas and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless they can be supported by robust evidence.

4.5.4 Where a part 1 local plan such as the WNJCS does not identify specific housing requirements for any settlements beyond the area’s principal town(s), it is considered appropriate and necessary for associated part 2 local plans to give due consideration to housing needs at a sub-district level by exploring what a suitable level of housing need would be for individual settlements within the hierarchy. The Framework requires local planning authorities to enable the creation of sustainable, inclusive and mixed communities which includes the consideration of market trends and the needs

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8 Planning Practice Guidance, Reference ID: 50-001-20160519
of different groups in the community. Furthermore, the Framework\textsuperscript{10} indicates that local planning authorities should give consideration to catering for housing demand and the scale of housing supply necessary to meet this demand within the consideration of housing needs. In particular, if there is to be continued support for facilities and services within rural settlements, then consideration needs to be given to the maintenance of the working age and school age population within them.

4.6 Settlement Hierarchy and Village Confines

4.6.1 The Plan must provide a positive Framework to enable growth in settlements across the rural settlement hierarchy. In establishing the settlement hierarchy and associated planning policies, consideration should be given to how the role and functionality of settlements may change over the course of the plan period, ensuring that individual settlements are not permanently held back from enhancing their individual sustainability credentials in both qualitative and quantitative terms. Issues to take into account include the continued availability of services and facilities; the ability of those services and facilities to improve, or for new facilities to be established; the ability to address housing demand and the needs of the wide range of groups within the community; and, the maintenance of young and working age residents within settlements. The delivery of a supply of new housing is important way of ensuring, securing and improving the sustainability of existing communities as well as meeting local housing needs.

4.6.2 The local plan must also recognise the relationship that some of the wider parishes around Daventry District’s rural settlements have with the NRDA. Locations that are well related to the NRDA benefit from the wide range of services, facilities and employment opportunities that are provided in Northampton. It is therefore essential that the local plan assists the maintenance of a rolling five year housing land supply for the NRDA by enabling development to come forward in locations that have the ability to form part of the NRDA in a manner that positively reflects the presumption in favour of sustainable development.

4.6.3 Gladman considers that settlement boundaries should not be arbitrarily used to restrict otherwise sustainable development from coming forward. The Framework is clear that development that is sustainable should be approved. The use of settlement boundaries to arbitrarily restrict sustainable development coming forward, including sites on the edge of settlements, does not accord with the positive approach to growth required by the Framework. Policies should not create blanket restrictions against development and instead seek to positively enable current and future development needs in sustainable locations whilst recognising the intrinsic character and beauty of the countryside and the need to support thriving rural communities.

\textsuperscript{9} National Planning Policy Framework, Paragraph 50
\textsuperscript{10} National Planning Policy Framework, Paragraph 159
4.6.4 Gladman are of the view that a criteria led policy approach should be introduced which sets out the circumstances in which sustainable extensions to the settlements would be appropriate. In addition to taking account of any land necessary to make a meaningful contribution towards meeting existing and future development needs, any such approach should provide flexibility to respond to changing circumstances in terms of the supply of housing land to ensure that it is an effective policy tool that recognises that the settlement edge is often a sustainable location for growth.

4.6.5 The Housing White Paper identified potential future changes to the National Planning Policy Framework that would require local planning authorities to provide neighbourhood groups with a housing requirement figure. The methodology for this has not been fixed, but it is a signal that settlements will need to meet their share of local housing need. Consideration should therefore be given to the level of growth that will be required at rural settlements across the settlement hierarchy in order that their sustainability can be maintained and enhanced over the plan period.

4.7 RA1 - Primary Service Villages and RA2 – Secondary Service Villages

4.7.1 Primary Service Villages are highlighted within the Plan as having the highest level of services and facilities within the rural area to meet the day to day needs of residents, including those from surrounding settlements. Secondary Service Villages are also well served by services and facilities which the local plan should seek to maintain and enhance over the plan period. Rural Service Villages are appropriate for accommodating local housing and employment needs. Indeed, such settlements are well positioned to accommodate additional new development over the remaining years of the plan period, including that which is needed to address specific local needs for both market and affordable housing.

4.7.2 It is clear from the Council’s emerging evidence base that the Primary and Secondary Service Villages are sustainable settlements in their own right. It is therefore essential that the local plan creates a positive framework of policies to maintain and wherever possible enhance the sustainability of these settlements over the remainder of the plan period. Policy RA1(B) and RA2(B) make reference to the potential to support development proposals outside of the current development limits in exceptional circumstances, or where it is required to meet identified local needs. In preparing the submission version of the DLPP2, further clarification will be required within the wording of these policies with regard to the circumstances in which these exceptional circumstances would be triggered and how the specific needs of individual settlements will be determined and addressed, taking into account the points covered in paragraphs 4.5.1 to 4.6.5 above.

4.8 RA5 - Open Countryside

4.8.1 Policy RA5 should be amended to reflect the intention of Paragraph 17 of the Framework, which seeks the recognition of the intrinsic character and beauty of the countryside and the need to support thriving rural communities within it. The general protection of rural ‘tranquillity’ that is
currently referenced within the opening paragraph of Policy RA5 does not feature within the Framework.

4.8.2 Gladman would wish to raise concerns that Policy RA5 is more akin with now outdated national policy which sought to protect the countryside for its own sake. Flexibility will therefore need to be provided within the policy to recognise and reflect the circumstances in which sustainable forms of development alongside rural settlements (including Service Villages) will be considered and supported over the course of the plan period.

4.9 **HO7 - Housing Mix and Type**

4.9.1 Policy HO7 includes the proposed introduction of a fixed approach to identifying the housing mix for open market housing and affordable housing. It is essential that a flexible approach is brought forward in this regard, allowing housing schemes to respond to new evidence, circumstances specific to individual sites, demand within the market and viability.

4.9.2 Policy HO7 also outlines that the Council is seeking to introduce optional housing requirements. In this regard, Gladman refer to the PPG which provides the national guidance on this matter. The PPG states:

> “Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to the Requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements…” (PPG ID:56-008-20160519)

4.9.3 The Council need to be able to demonstrate through robust evidence the justification and rationale for the percentage requirements that they are proposing through this policy.

4.9.4 The provision of specialist housing to meet the needs of older people is of increasing importance and the Council needs to ensure that this is reflected through a positive policy approach within the Local Plan. The Council needs to establish a robust understanding of the scale of this element of need across the district. Specialist housing with care for older people is a type of housing that provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care). Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally accessible communal facilities including residents’ lounge, library, dining room, guest suite, quiet lounge, ICT suite, assisted bathroom, internal buggy store and changing facilities, reception and care managers office and staff facilities.
4.9.5 Gladman refer the Council to a recent piece of research (conducted by Irwin Mitchell) regarding local plan policies for the elderly\(^\text{11}\). This research graded local planning authorities depending on the policies in place in their recently adopted or emerging local plans. The grading identified through this are as follows: A: clear policy and allocation, B: clear policy but no specific allocations, C: site allocation but no policy and D: neither a clear policy nor specific site allocations. Following this research, the head of planning at Irwin Mitchell stated: “Properly providing for the housing needs of the ageing and the elderly therefore represents a land efficient way for local planning authorities to also address general housing needs.”

4.10 **Vibrant Economy**

4.10.1 Gladman are concerned that the DLPP2 does not currently seek to introduce a pro-active approach to maintaining and enhancing the rural economy. Paragraph 28 of the Framework identifies that planning policies should support economic growth and promote a strong rural economy. This includes the need to promote the retention and development of local services and community facilities in villages. In order to achieve this, it is essential that the plan provides the sustainable development, including market and affordable housing, which communities will need to achieve this goal.

4.11 **ENV1 – Landscape**

4.11.1 Paragraph 9.1.06 includes a statement that suggests that where a proposal would result in landscape harm, there would be a general principle that it should be refused unless there would be an overriding public benefit of the development, for instance, to meet an evidenced local housing need. In such cases, an effective landscape scheme would be crucial to mitigate any harm. This proposed approach is then set out in ENV1(D). This proposition is considered to be a misrepresentation of national policy\(^\text{12}\), which does not set a general principle to refuse development proposals where there is landscape harm.

4.11.2 Paragraph 113 of the Framework refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that that protection should be commensurate with their status and gives the appropriate weight to their importance and contribution to wider networks. As currently drafted Gladman do not believe this landscape policy aligns with the Framework.

4.11.3 Gladman wish to point out that impact on the landscape is one factor that should be considered by the decision maker when determining any planning proposal and ultimately it is a balance of the


\(^{12}\) National Planning Policy Framework, Section 11
harm of development against the benefits. It is only where the harm significantly and demonstrably outweighs the benefits that planning permission should be refused.

4.11.4 Reference is made in ENV1(A.iv) to the requirement for development proposals to avoid physical and visual coalescence between settlements. Gladman submit that new development can often be located in countryside gaps without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character.

4.11.5 Gladman also wish to question how the Council intends to consider the cumulative impact of development proposals on the quality of the landscape through the development management process.

4.12 **ENV2 Special Landscape Areas**

4.12.1 Policy ENV2 sets out the intention to designate some 41% of the District as being within ‘Special Landscape Areas’. Gladman would wish to raise concerns regarding the manner in which the Council intends to identify and protect these extensive areas of countryside. Policy ENV2 appears contrary to the Framework’s approach to the consideration of the natural environment within the planning system. Paragraph 113 of the Framework indicates that criteria based policies should be prepared, against which proposals on or affecting landscape areas will be judged. Furthermore, distinctions must be made within such polices between the hierarchy of designations based on their relative importance. The approach set out in ENV2 to identifying and protecting an extensive local landscape designation fails to include a clear criteria based approach to use within decision making or any reference to the special local landscape characteristics that the policy is seeking to manage through the planning system.

4.13 **ENV3 Green Wedge**

4.13.1 Policy ENV3 proposes an approach to designating areas as ‘green wedges’. The areas that have been identified as being within the proposed green wedge are extensive in nature. It is therefore essential that any associated policies recognise that proposals for sustainable development within these areas can often be accommodated without compromising the overall function and purpose of such designations.

4.14 **ENV5 Biodiversity**

4.14.1 Policy ENV5 should reflect the Framework’s requirement for the planning system to minimise impacts on biodiversity and provide net gains where possible. In doing so, it should be recognised that any harm arising from an individual site should be considered through a planning balance exercise undertaken in accordance with the presumption in favour of sustainable development.
4.15 **ENV 8 – Historic Environment**

4.15.1 It is essential that any policies relating to the historic environment are consistent with the requirements of the National Planning Policy Framework.

4.15.2 With reference to designated heritage assets, the Council should refer specifically to paragraphs 133 and 134 of the Framework, which set out the need to assess the significance of a designated heritage assets and where there is less than substantial harm, this should be weighed against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm.

4.15.3 For non-designated assets, the policy must reflect the guidance set out within paragraph 135 of the Framework. This states that the policy test that should be applied in these cases is that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset.

4.16 **CF3 – Protecting local retail services and public houses**

4.16.1 Chapter 10 provides the context and proposed local policies relating to community facilities across Daventry District. In this regard, Gladman notes the intention of policy CF3 to protect local retail services and public houses. The current policy seeks to protect services in rural areas, however paragraph 28 of the Framework goes further by requiring local policies to promote the retention and development of facilities in villages. Consideration should therefore be given to extending the scope of this policy to ensure that the Plan takes a pro-active and positive approach to meeting this requirement of the Framework across the settlements of the rural area. It is essential that the local plan does not just focus on the enhancement of its urban centres (which are supported extensively through the policies in Chapter 7) by also identifying and responding to the needs of communities in the rural area.

4.17 **PA1 – Local Green Space**

4.17.1 Paragraph 77 of the Framework sets out the national policy position in relation to Local Green Space designations and sets out the following tests which need to be met in order to designate Local Green Space.

- "Where the green space is in reasonably close proximity to the community it serves;"

- *Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*

- *Where the green area concerned is local in character and is not an extensive tract of land."

(emphasis added)
4.17.2 As outlined through national policy, the Council need to have clear justification for designating land as Local Green Space, and they should not be using this as a means to arbitrarily protect vast areas of land from development.

4.17.3 The PPG provides further clarity on the designation of Local Green Space, and at paragraph 37-015-20140306 states:

“There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed. However, paragraph 77 of the National planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.” (emphasis added).

4.17.4 The Council needs to ensure that the Local Plan designations align with national policy and that they are able to demonstrate the rationale behind any such designation. This is particularly key as the Council is proposing to designate a significant number of sites as Local Green Spaces. All of these areas of land need to be demonstrably special to a local community and be of local significance in order for them to merit this designation.
5 SITE SUBMISSIONS

5.1.1 There is a continued need for the local plans in West Northamptonshire to remain responsive to the needs of the Housing Market Area by enabling the delivery of new housing in sustainable locations. The approach taken through part 2 plans must therefore be suitably flexible to allow rapid and positive responses to be made during the plan period should there be any changes in circumstance, such as the inability to maintain a rolling 5 year housing land supply. Changes in circumstance could include sites not coming forward as anticipated or delivering fewer units than expected when these issues were considered during the examination of the WNJCS.

5.1.2 It is important that the three authorities in West Northamptonshire work collaboratively to ensure that the Part 2 Plans find a solution to the need to secure a rolling five year housing land supply across the WNJCS area. It will also be important to allow a wider range of housebuilders (including those that are Small and Medium Sized) the opportunity to deliver sites, thereby increasing the range of products available and speeding up delivery in West Northamptonshire. This approach would also supplement the slower rates of delivery than initially expected on a number of strategic sites that were identified in the WNJCS, including those relating to the NRDA.

5.1.3 The Plan should also positively respond to the national policy imperative to plan for thriving rural communities. This can be achieved by ensuring that the Local Plan Part 2 enables the delivery of housing on sites across the settlement hierarchy to ensure that the needs of both the rural and urban areas of the district are genuinely addressed.

5.1.4 Gladman are promoting the following sites, which can each be successfully integrated into sustainable settlements and are available, achievable and deliverable. Further details relating to these sites are provided in the sections that follow:

- Land at Holly Lodge Drive, Northampton
- Land at New Street, Weedon
- Land at Brington Road, Long Buckby
Gladman propose that land off Holly Lodge Drive, Northampton (shown in Figure 1 below) is allocated for residential development.

5.1.6 The site has a functional relationship with Northampton, adjoining the NRDA and therefore is considered that the site would contribute directly towards meeting the housing need for the NRDA.

5.1.7 Northampton is the major focus for housing development in the adopted WNJCS and as outlined earlier, the housing land supply position in the NRDA has deteriorated in recent years. Consequently, there is an urgent and pressing need for this Plan to respond, by embracing a positive approach to meeting the needs of the NRDA, such as allocating suitable, smaller scale sites to help address the existing housing need.

5.1.8 The site, off Holly Lodge Drive, is well contained with defensible boundaries along all of the site borders. It is conveniently located for access to services and facilities by walking and cycling in Northampton and surrounding villages and would form a logical extension on the edge of Northampton.

5.1.9 Technical information in support of the proposal demonstrates that up to 75 dwellings can be constructed on-site and is available, achievable and deliverable in the next 5 year period in order to meet the pressing need for new housing to meet Northampton’s need.
5.1.10 This development, as proposed, clearly constitutes ‘sustainable development’, is viable and deliverable and should be considered as a potential site to be allocated.

**Land at New Street, Weedon Bec**

5.1.11 Gladman propose that land at New Street, Weedon Bec (shown in Figure 2 below) is allocated for residential development.

![Figure 2: Land at New Street, Weedon Bec](image)

5.1.12 Weedon is identified in the DLPP2 as a Primary Service Village and consequently is considered to be a sustainable location for further growth.

5.1.13 Weedon Bec in fact has a significant range of services and facilities within the settlement including; Primary School, Doctors, Employment, Convenience and Comparison Shops, Pubs and Takeaways. There is also a good range of employment opportunities nearby which are accessible by public transport. Therefore it is clear that Weedon Bec is a suitable location for development.

5.1.14 The proposed site is well contained and defined by existing development to the north and west, existing development and Farthingstone Road to the east and hedgerows to the south. Development of the site would constitute a natural extension to the village.

5.1.15 The site is also conveniently located close to a range of facilities and services in the village.

5.1.16 There are no technical constraints that will prevent development from coming forward in this location and it is considered that the site could deliver 121 dwellings.
This development, clearly constitutes ‘sustainable development’, is viable and deliverable and should be considered as a potential site to be allocated.

**Land at Brington Road, Long Buckby**

Gladman propose that land at Brington Road, Long Buckby (shown in Figure 3 below) is allocated for residential development.

**Figure 3: Land at Brington Road, Long Buckby**

Long Buckby is categorised in the DLPP2 as a Primary Service Village. It has a number of facilities including Primary School, Doctors, Convenience and Comparison Shops, Pubs and Takeaways. There is also a good range of employment opportunities nearby which are accessible by public transport.

The site is located on the southern edge of Long Buckby and is considered to be a logical extension to the village which is well enclosed with existing residential development bounding the site on three sides. It is also conveniently located close to existing public transport links.
5.1.21 The site is suitable for residential development and there are no technical constraints that will prevent development from coming forward in this location. It is considered that the site could deliver 87 dwellings.

5.1.22 This development, clearly constitutes ‘sustainable development’, is viable and deliverable and should be considered as a potential site to be allocated.
6  CONCLUSIONS

6.1.1  Having considered the DLPP2, Gladman have raised a number of matters that should be taken into account as the plan preparation process develops. This includes the need for planning policies to take a positive approach towards delivering the development needs of the urban and rural communities across Daventry and to support delivery across the wider West Northamptonshire Area.

6.1.2  When allocating land for new development, local plans must be suitably pragmatic in order to ensure that they become an effective tool in managing development. To achieve this, they must provide a suitable level of flexibility and contingency to respond to changes in circumstance over the plan period. The housing requirement contained within the WNJCS and associated part 2 local plans must be treated as a minimum requirement for the purposes of allocating land for development and sufficient land should be identified within the plans to demonstrate that this requirement can be achieved and exceeded whilst maintaining a rolling five year housing land supply in both the NRDA and the rural area. To achieve this, an appropriately flexible strategy for accommodating growth must be taken forward. In doing so, development should be directed to locations that are well related to the NRDA as well as to all sustainable settlements to support their future vitality and viability in terms of the services and facilities that they can provide now and in the future to meet the needs of residents.

6.1.3  Gladman have highlighted a number of sustainable development opportunities through these representations and request that they are included as residential allocations.

6.1.4  We trust that these comments have been constructive and request to be added to the consultation database and to be kept informed regarding the progression of the emerging DLPP2 and future consultations.