

# #10

**COMPLETE**

**Collector:** Web Link 2 (Web Link)  
**Started:** Saturday, September 22, 2018 11:07:23 PM  
**Last Modified:** Saturday, September 22, 2018 11:19:25 PM  
**Time Spent:** 00:12:01  
**IP Address:** 109.180.150.7

---

## Page 2: Part A

### Q1 Personal Details\*

Title	<b>Mrs</b>
First Name	<b>K</b>
Last Name	<b>Edwards</b>
Address Line 1	
Line 3	<b>Staverton</b>
County	<b>Northants</b>

---

### Q2 Personal Details Continued

Postcode  
Email (If provided we will always contact you this way)

---

**Q3 Agents Details (If Applicable)** **Respondent skipped this question**

---

**Q4 Agents Details Continued** **Respondent skipped this question**

---

## Page 3: Part B

**Q5 To which part of the Local Plan does this representation relate? Please state paragraph Number/ Policy Number/ Policies Maps**

5.2 Settlement Hierarchy

---

**Q6 Do you consider the Local Plan is:(Please tick in the box below as appropriate and then provide details in the space below)**

(3) Sound? **No**

---

**Q7 (1) Please give details of why you consider the Local Plan is not legally compliant, be as precise as possible.** **Respondent skipped this question**

---

**Q8 (2)** Please give details of why you consider the Local Plan does not comply with the duty to co-operate, be as precise as possible. **Respondent skipped this question**

**Q9 (3)** Please give details of why you consider the Local Plan is not sound, referring to the tests of soundness as appropriate, be as precise as possible.

Due to areas of weakness and inaccuracies within the methodology used to determine the Settlement Hierarchy, I consider the Local Plan in its current form to be unsound. Both the weighted scoring mechanism and the reflective assessment fail to deliver an accurate picture of the degree to which a service and/or a facility contributes to the day to day needs of a community. For example Staverton has been awarded the highest number of points (10) for a Primary School that serves a handful of Staverton residents, with 90% of children coming in from Daventry town not from neighbouring catchment villages. The weighted scoring system is fundamentally unsound as the presence of a facility/service is afforded the same points regardless of how many of them exists e.g. In terms of Employment Provision, a village such as Braunston has 30 plus businesses offering employment opportunities where Staverton has extremely limited Employment Provision, yet we both score 5 points! Braunston has 4 pubs and Staverton has 1 Pub yet they both score 10 points. How the presence of a Pub can be deemed more important than a large number of employment opportunities is also unsound. People do not move to an area for a Pub, but many do move to secure employment. I appreciate that if a service and/or facility is under threat, then from a sustainability perspective it may be deemed to be appropriate to allocate a village to a higher status. However, as acknowledged by DDC "No evidence has been provided that indicates the existing services and facilities in Staverton village are under threat."

It is stated that the Weighted Scoring approach is compensated for in the Reflective Assessment. It is not clear to me how this has been achieved. It is stated that Criteria 1-10 of policy R1 provided guidance on what should be considered when establishing the Settlement Hierarchy, with the emphasis in respect of the quantitative assessment largely related to criterion 1. However, there is no mention of how the remaining criteria have been applied to each village. The Primary School could be argued to meet criterion 1 for a very small percentage of Staverton residents, and for a greater number of surrounding settlements. However, it is ridiculous to conclude that the presence of a Village Hall and a Pub meet the day to day needs of residents, or surrounding settlements. We are told the Reflective assessment was undertaken by 'walking around' each village. It is difficult to understand how this exercise concluded that Staverton falls within the same category as say Braunston or Byfield. Surely there is no comparison between a village with 186 residents (Braunston 781, Byfield 546) with no post office, no shops, no practical daily bus service, no doctors, no dentists etc as opposed to Braunston and Byfield with many facilities and regular bus services to other Employment areas. Yes, we have a Pub and what can only be described in the loosest of terms as a bus service, neither of which have any guarantee of permanence. Statistics show that record numbers of pubs are closing daily and that many rural bus routes are considered unviable. What mechanism is in place if a village loses its pub (10 points) and therefore is no longer 'weighted' sufficiently to remain in its current Settlement Hierarchy status? The Settlement Hierarchy is surely at risk of becoming no longer accurate and therefore invalid. I fail to see how walking around Staverton which is a small village with 1 Playing Ground, a Village Hall, a Church and a Pub and then walking around Braunston which has 2 Cafes, a large Village Hall with parking, 4 Pubs, a General Store, a Post Office, a Butchers, a Hairdressers, and a Fish and Chip shop can result in both being considered comparable as Secondary Service Villages. The Reflective assessment is clearly inequitable and therefore unsound as a means of assessment. Certain factors such as topography or ability to cope with additional traffic and parking appear to have been ignored, although these may be highly important in determining the planning policies which should be applied to a Village. In terms of Staverton there are also several inaccuracies which I highlighted in the last consultation, yet these have not been corrected. Staverton is awarded 5 points for a daily bus service. This is incorrect as there are no buses running on either a Saturday or Sunday, therefore it is not a daily bus service. Weekdays there is a bus from Daventry via Staverton to Leamington in the early morning and a bus from Leamington via Staverton to Daventry in the early evening. Therefore, the nearest employment opportunities within Daventry can only be reached by one bus in the early evening with no return service until early morning the next day. Part 2 of the Plan designates the Strategic Employment Areas as Crick, Brixworth, Long Buckby & Woodford Halse. Therefore, this service cannot be deemed to provide daily access to designated nearby Employment Areas. Yet Staverton scores the same points as say Walgrave that is stated to have a bus (11 x daily) to two large employment areas of Northampton and Kettering, or Badby that has hourly services to Daventry & Banbury. This is a clear example that just because a service exists in some form, it does not follow that it provides a practical service to meet day to day need. Staverton has been awarded 5 points for shops/takeaway neither of which exist. The limited shop at Skylarks Farm was closed over a year ago. Skylarks predominately caters for Weddings and as such is regularly closed to the

Public throughout the week and weekends. Due to the diversification of their business the Cafe at Skylarks is open sporadically to the public and when open closes at 4:30pm. Whilst the café serves food and may on the odd occasion wrap a sandwich up for someone to take away, it does not market itself as a takeaway nor can it reasonably be considered as such. It is also located a distance from the Village Settlement with no safe walking or cycle routes. Another inaccuracy is that Staverton has been awarded 1 point for a Playground and 1 point for a Sports Ground, these are one and the same, a single plot of land used for leisure activities.

In the last consultation over 80 Parishioners supported a group response to DDC essentially echoing the above, but it appears that DDC took the response from the Staverton Parish Council (8 individuals) to be in support of Staverton's position as a Secondary Service Village over that of a substantial number of Parishioners who felt that was incorrect. At the Staverton Parish Council (SPC) meeting on the 04/09/2018 it was agreed to rescind the original response as not being representative of all of the Councillors present, and to submit a new response stating that SPC are firmly of the mind that Staverton should fall firmly within 'Other' village category. Therefore, the decision by DDC to attribute more weight to the SPC submission over and above that of Parishioners was also unsound.

In summary Staverton does not score just above the minimum requirement for a SSV when corrections regarding the bus service, shop/takeaway and sports ground are made. It is unclear as to how DDC's reflective assessment led to Staverton being categorised as a SSV. DDC's own description of 'Other' village perfectly sums up Staverton

These villages have an even more limited range of services and are more reliant on the services of larger centres for day to day needs.

---

**Q10** Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at part 4(1) or 4(3) above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To rectify the errors as stated above (9. (3))

---

**Q11** If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please tick as appropriate)

**No, I do not wish to participate at the oral examination**

---

**Q12** If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

**Respondent skipped this question**

---

**Q13** Do you wish to be notified of further progress of the Local Plan

**Yes**