

#13

COMPLETE

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Page 2: Part A

Q1 Personal Details*

Title	Mr
First Name	Rupert
Last Name	Frost
Job Title (Where Relevant)	District Councillor
Organisation (Where Relevant)	Daventry District Council
Address Line 1	
Line 2	
Line 3	Staverton
City/ Town	Daventry
County	Northamptonshire

Q2 Personal Details Continued

Postcode
Telephone Number
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

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

Section 5.2.24 RA2 - Secondary Service Villages

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

- | | |
|---|------------|
| (1) Legally Compliant? | Yes |
| (2) Compliant with the Duty to co- operate? | No |
| (3) Sound? | No |

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

n/a

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.

Staverton's amenities are limited to a Public House, a Primary School and a Village Hall, none of which are under threat. It also has a small play/sports area. All day to day needs are met by Daventry i.e. Secondary Schools, GP Surgery, Shops, Post Office, and employment opportunities.

There is very small employment provision provided by the presence of a handful of Small Businesses. There are no safe walking or cycle routes to the outlying employment provision. Despite being referred to as a daily bus service, there is an extremely poor and impractical service that does not run every day. Therefore, most residents are dependent on private transport to travel to work, shops, doctors etc. Within the emerging Local Plan part 2, Staverton is listed as a secondary service village, but the assumptions that led to this are inaccurate and listed in section 4(3) below.

The people of Staverton realised this during the draft consultation phase and 90 of them wrote to Daventry Council in January 2018 to explain in detail why Staverton should be placed in the "Other Villages" category. They only found out that they had been unsuccessful once the minutes of the Strategy Group meeting on 5th July 2018 were published and the window of opportunity to influence events closed on 26th July when the decision was ratified at the main Council meeting.

Thus Daventry Council failed in its duty to cooperate, relying instead on the ambivalent response of the local Parish Council which has since tried to correct matters by writing to the planning department explaining that they now agree with the rest of the village that Staverton should be classed as an "other village" not a "secondary service village".

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.

The plan is currently unsound because Staverton is listed as a Secondary Service Village. It should be re-designated as an "Other Village" for the following reasons: -

1) The weighted scoring system is fundamentally flawed as the presence of a facility/service is awarded the same points regardless of how many of them exists e.g. Braunston has 4 pubs and Staverton has 1 pub yet they both score 10 points.

2) In terms of employment provision, Braunston's includes:- a General Store, a Post Office, a Butchers, a Hairdressers, a Community Café, Gongoozler Café, a Canal Museum, Boat Hire, a Marina, a Fish and Chip shop, a Chandlery, Wharf House Narrowboats, Direct Marine Components Ltd, Minden Systems Ltd, Inspiron, Days Afloat, Vega Racing Components, Braunston Garage, a canal side Shop, Coffee Classics Ltd, Union Canal Carriers Ltd, Beta Marine Spares and Service, Lister Spares, ISUZU Sales and Service Dealer.

By contrast Staverton has extremely limited employment provision, yet we both score 5 points. Implicit within the plan is the logic that the presence of a Pub is more important than many employment opportunities and this is an example of why this part of plan is unsound. Theoretically these shortcomings are compensated for in the reflective assessment but no explanation for this is given.

3) 5 points have been given for a daily bus service when there is no daily service. There is a bus to Leamington Spa in the early morning and a bus to Daventry in the early evening. The same bus allows transport back from Leamington in the afternoon and from

morning and a bus to Daventry in the early evening. The same bus allows transport back from Leamington in the afternoon and from Daventry in the morning, but this is no daily bus service as claimed and what service there is does not operate at weekends.

Therefore, the nearest employment opportunities within the district can only be reached by one bus in the early evening with no return service until early morning the next day. Staverton's residents could use this if they work week nights in Daventry but nobody else could.

Part 2 of the Local Plan designates the Strategic Employment Areas as being Crick, Brixworth, Long Buckby & Woodford Halse. Therefore, this bus service cannot be deemed as providing access to designated nearby Employment Areas on a day to day basis. Despite this, Staverton scores the same points as Walgrave that is stated to have a bus (11 x daily) to the two large employment areas of Northampton and Kettering.

It also scores the same points as Badby that has hourly services to Daventry & Banbury. This is a clear example that because a service is present does not mean that it fulfils a functional day to day need. Due to the extremely restricted and impractical nature of the bus service in Staverton, the correct score should be 0.

4) Staverton has been awarded 5 points for shops/takeaway neither of which exist. The limited shop at Skylarks Farm was closed some time ago and the café there is not a takeaway.

5) 1 point was awarded for a Playground and 1 point for a Sports Ground however these are one and the same, so have been counted twice.

6) Taking these facts into account the total quantitative assessment score is significantly reduced. Comparing Staverton to the general requirements for a Secondary Service Village Minimum Score, it fares as follows: -

3/8 Most Important Services and Facilities 30.
Pub, Village Hall, Primary School = 30

2/4 of the Important Services and Facilities 10.
Employment Provision = 5

2/3 of the Other Services and Facilities 2.
Combined play area/sports ground = 1

Be located on a daily bus service 5.
No daily bus service = 0

Therefore the total score is 36 (firmly in "other village status") not 47 as claimed.

7) Criteria 1-10 of policy R1 provides guidance on what should be considered when establishing the Settlement Hierarchy, with the emphasis on services and facilities meeting the day to day needs of residents, including those from other surrounding settlements. The Primary School could be argued as meeting the needs of a very small percentage of Staverton residents, and for a greater number of surrounding settlements. However, it cannot be claimed that a village hall and pub meet the day to day needs of either Staverton residents or those living nearby.

8) It is stated that, since 2011, two dwellings have been completed but this is incorrect - three dwellings have been completed (3 bed house Vine Tree Farm). A 3-bedroom house has also recently been built on Badby Lane with a further 4 houses along Badby Lane nearing completion. In addition, a Barn conversion on Manor Road is nearly complete bringing a total of 9 since 2011.

9) Several businesses are listed as offering employment provision, but need correcting as follows:

1280538661 Milburn Boats

[28000000] [unclear] [unclear]
No longer exists (closed)

[28050537] M Davies Ltd Showroom Hillside Badby Lane Staverton NN11 6DE
[28003235] M Davis Ltd Hillside Badby Lane Staverton NN11 6DE
[28057707] Workshop New House Badby Lane Staverton NN11 6DE
All three are the same but have been counted 3 times.

[28003325] J A Hall Garden Machinery Badby Lane Staverton NN11 6DE
No longer exists (deceased)

[28042621] FURNITURE FIRST LTD Vine Tree Farm Daventry Road Staverton NN11 6JH
B8 Storage only

[28050431] Rural Enterprises CIC Green Acres Catesby Road NN11 6JP
Majority of staff are Volunteers

[28003312] Staverton Park Golf Club Daventry Road Staverton NN11 6JT
Part of the Hotel complex

[28054401] Hand Carwash Staverton Park Hotel Daventry Road
No longer exists (closed)

[28044484] Community and Public Pavilion Daventry Road Staverton
Does not exist

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.

The only modification I am seeking is for the village of Staverton to be moved from RA2 - Secondary Service Village to RA3 - Other Villages. Thank you for your time, kind regards Rupert

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)

Yes, I 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.

A substantial area of the Village lies within the Conservation area and the Village is surrounded by Strategic Land Allocation (SLA). The Staverton Housing Needs Survey indicated that 11 existing residents may have a housing need. The 5 houses under development will go a long way towards meeting this modest need and 4 houses have already been built since 2011). Staverton has little capacity to build within its confines and its roads and lanes are manifestly unsuited to an increase in cars, whilst its sewage system is already at capacity: Staverton is one of the few villages that has its own treatment works and whose main pipes are smaller than modern systems. Feedback to the recent neighbourhood plan consultation revealed a strength of feeling among parishioners that an upgrade to the sewerage system is a pre-requisite to any future development.

Part 2 of the Local Plan intends to allocate a minimum of 800 units within 10 mins safe walk of Staverton, therefore any residual (particularly affordable) need could easily be met by that development or by a small amount of development within Staverton. Encroachment onto 'Open Countryside' should be declined as the rural housing need has been exceeded.

Understandably, DDC's planning department relied on information provided by those who responded to the Consultation in 2016. Unfortunately, those parishioners with no links to the parish council were unaware of this Consultation. It has since emerged that the Parish Council Representatives at the time initially offered 'No Comment', although none could recall the Consultation. Therefore, the preparatory work for the Local Plan was influenced and informed by the minority who did respond and I would appreciate the opportunity to set the record straight at the Oral Examination.

Based on elements covered by our feedback to the proposed Settlements Hierarchy, the limited range of services and facilities, and relatively small scale of Staverton, it is clear to me Staverton should be re-categorised as an 'Other Village'. Gratifyingly, our parish council now also holds the same view.

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