

This form has two parts:

Part A – contact details

Part B – your representation

Please fill in a separate sheet for each representation you wish to make.

Ref:

(for official use  
only)

### Part A

1. Personal Details*		2. Agent's Details (if applicable)
<i>* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in column 2.</i>		
<b>Title</b>		<b>Mr</b>
<b>First name</b>		<b>Gareth</b>
<b>Last name</b>		<b>Johns</b>
<b>Job title (where relevant)</b>		<b>Senior Planner</b>
<b>Organisation (where relevant)</b>		<b>Savills</b>
<b>Address line 1</b>		<b>Ground Floor, Hawker House</b>
<b>Line 2</b>		<b>5-6 Napier Court</b>
<b>Line 3</b>		<b>Napier Road</b>
<b>City/Town</b>		<b>Reading</b>
<b>County</b>		
<b>Postcode</b>		<b>RG1 8BW</b>
<b>Telephone number</b>		<b>01189 520 539</b>
<b>Email (if provided we will always contact you this way)</b>		<b>gjohns@savills.com</b>

## Part B: Please use a separate sheet for each representation

Please note all comments will be made publically available. If you do not have sufficient space in the box please continue on a separate sheet or expand the box.

3. To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
		Policy RA1	

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

<b>4. (1) Legally compliant?</b>	Yes	✓	No	
<b>4. (2) Compliant with the Duty to co-operate?</b>	Yes	✓	No	
<b>4. (3) Sound?</b>	Yes		No	✓

**4 (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 WNJCS includes an allowance for development in the rural areas of about 2,360 dwellings in the period to 2029. The WNJCS adds that's Part 2 Local Plans "*will ensure that the scale of development is proportionate to the scale of each village within the hierarchy and will take into account the level of existing planning permissions and completions have taken place within the village during the plan period*" (paragraph 16.14 of the WNJCS).

Table 2 – 'Classification of Settlements in the Hierarchy' of the Proposed submission document identifies Brixworth as a 'Primary Service Village'. Paragraph 5.2.01 confirms that Primary Service Villages "*have the highest level of services and facilities within the rural area to meet the day to day needs of the residents including those from surrounding settlements. These settlements are the most appropriate for accommodating local housing and employments needs and would be the focus for service provision in the rural areas*" [our emphasis]. The SMV agree with the identification of Brixworth as one of the most sustainable villages in the district.

However, it is noted that the overall housing requirement set out in the WNJCS for the rural areas has already been met through completions and commitments and, therefore, no sites will be allocated in the rural areas in the Local Plan Part 2 (paragraph 5.1.03). Policy R1 of the WNJCS confirms the limited circumstances where additional growth may be developed in rural areas once the housing requirement has been met. This includes where it supports the retention or improvement to local services, or been agreed through an adopted Neighbourhood Plan.

Policy RA1 'Primary Service Villages' of the Local Plan (Part 2) suggests that only in 'exceptional circumstances' will development outside of the village confines be acceptable. These include where the housing land supply is less than five years (three years where a NP is in place that allocates housing), a local need is identified through an up-to-date Housing Needs Survey (to be carried out by the Council) and where a scheme is required to support an essential local service (i.e. primary school) that has been demonstrated to be under threat. The Policy

However, the SMV consider that this policy mechanism is too onerous and restrictive, and will not deliver the aims of the policy (i.e. to support the spatial distribution strategy and to maintain and enhance the vitality of the Primary Service Villages).

In particular, the SMV have the following concerns with the approach:

- a) It is not clear how the Housing Needs Survey (HNS) will work – how often will these be carried out and/or updated by the Council?

- b) The approach is biased towards the first developer/landowner that submits an application following publication of a HNS to deliver the local need in that settlement directly in accordance with a particular scheme. This may not lead to the most sustainable sites in the village being delivered.
- c) The assessment does not take account of the aim to enhance and maintain the roles of the villages, in accordance with the settlement hierarchy/spatial distribution strategy.
- d) There needs to be more information on how and/or who will need to demonstrate that a local service is under threat and how development will be delivered to support that service.

With the above in mind, the SMV are of the view that the current policy approach is unsound as there is no compelling evidence that current Policy RA1 (alongside Policies RA2 - RA4) will support the spatial distribution strategy and/or maintain and enhance the vitality of the Primary Service Villages.

**5. 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.**

In order to make the Plan sound, the Council need to amend Policy RA1 to provide a positive framework and to be more flexible to deliver appropriate sites adjacent to the settlement confines in the most sustainable villages.

Furthermore, the Policy does not currently provide any incentives for Neighbourhood Plans (NPs) to come forward, or be reviewed where one has already been 'made'. The Policy should encourage NPs to identify additional development opportunities outside the village confines which would sustain or improve their position in the settlement hierarchy and support or enhance the vitality of the village (particularly where the retention of some of the villages services/facilities are uncertain).

#### Reserve Sites

Furthermore, the SMV strongly recommend that the Council identify reserve sites/safeguard land and include a policy mechanism to release reserve sites for development. This would make the Plan more robust i.e. to ensure that development is plan-led and has been positively prepared to respond to changed circumstances (i.e. lack of five year housing land supply, potential for loss of services and facilities in the village, under delivery of housing sites at Daventry etc).

#### *Land off Northampton Road and Land off Station Road*

In this respect, Brixworth is identified as a 'Principle Service Village' and is the one of the most sustainable villages in the District. The SMV's land off Northampton Road and Station Road is immediately adjacent to the built-up area of Brixworth, albeit the Council's HELAA identifies the site as 'not suitable' for development as the sites lies outside of the village confines in the open countryside.

However, we consider that the Council's HELAA is not an appropriate assessment of the sites because Policy RA1 should support development outside the village confines and/or there is a need to identify reserve sites to make the Plan more robust (see comments above). Accordingly, the HELAA should also assess the suitability of those sites outside of the village confines within the context of the built up area of the settlement.

Furthermore, it was acknowledged that the sites are currently located partly within (Northampton Road) and adjacent (Station Road) the Special Landscape Area (saved Policy EN1 in the Daventry Local Plan (1997)). However, we note that the Daventry Landscape Study (November 2017) includes a review of the Special Landscape Areas (SLAs). This demonstrates that the SMV's land is no longer within and/or adjacent to the

SLAs and, therefore residential development in these locations would be in keeping with the surrounding area.

We consider that the development of the 'Land off Northampton Road' for up to 150 dwellings and 'Land off Station Road' for 15-20 dwellings are deliverable options for the following reasons:

- Brixworth is capable of accommodating significant levels of growth given the range of services and facilities it currently offers and is therefore a sustainable location for development.
- Residential development in these locations would be in keeping with the surrounding area. The sites adjoin the existing built up area and are considered an appropriate extension to Brixworth.
- The sites are well related to and within walking distance to the village facilities, including the primary school, pubs, church, convenience store etc. and has access to frequent local bus services. Development on this site may not only assist in supporting such facilities and other business services in the village, but also has the potential to deliver other community benefits to the village.
- Opportunity to deliver new areas of green infrastructure/public open space.
- The sites have access to local employment opportunities within Brixworth.
- The scale of dwellings proposed is capable of delivering housing in line with local objectives, such as need for affordable housing etc.
- There are no planning history or policy constraints which would prevent the site coming forward for housing.
- There are no environmental or physical constraints to the sites.
- The sites are in the sole control of the SMV which will facilitate their timely delivery.

The above clearly demonstrates that both sites are suitable, available and achievable for residential development. Moreover there are no significant constraints which will prevent development on the sites and their allocation as reserve sites.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matter and issues he/she identifies for examination.**

**6. 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		Yes, I wish to participate at the oral examination	✓
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**7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.**

We wish to appear at the examination to present further evidence and technical information to support these representations.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**8. Please tick the box if you wish to be notified of further progress of the Local Plan.**

✓

<b>9. Signature</b>	<b>Gareth Johns</b>	<b>Date</b>	<b>4/10/2018</b>
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**Thank you for taking the time to complete the form.  
Please return it to the Local Strategy Service at Daventry District Council  
by 4.30pm on Friday 5<sup>th</sup> October 2018.  
Responses received after this time will not be accepted.**