



PS057

**Publication Stage (Regulation 19)
Proposed Submission Settlements and Countryside
Local Plan (Part 2) for Daventry District (August 2018)
Statement of Representation Form**

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>		
Title		Mr
First name		Guy
Last name		Longley
Job title (where relevant)		Executive Director
Organisation (where relevant)	Davidsons Developments Limited	Pegasus Group
Address line 1		4, The Courtyard
Line 2		Church Street
Line 3		
City/Town		Lockington
County		Derbyshire
Postcode		DE74 2SL
Telephone number		01509 670806
Email (if provided we will always contact you this way)		Guy.longley@pegasusgroup.co.uk

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
Chapter 3 – Vision and Objectives	3.1.03		

4. Do you consider the Local Plan is: (please tick in the box below as appropriate and then provide details in the space below)				
4. (1) Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	
4. (2) Compliant with the Duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	
4. (3) Sound?	Yes		No	<input checked="" type="checkbox"/>

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.

Chapter 3 of the Submission Draft Plan sets out the Vision and Objectives for the Part 2 Plan. Objective 9 states that the objective for housing is to provide a range of housing in sustainable locations, with housing development focused on the most sustainable location at Daventry, with limited development in the rural areas to provide for local needs and support local services.

The Part 2 Plan does not propose to make any further allocation in the rural communities over the plan period to 2029. Rather, the plan relies on windfall site provision in the existing settlement limits to provide for local rural needs. It is considered that this approach will fail to ensure the delivery of sufficient housing in the rural communities to meet needs and that, as a result this objective will not be met. As currently framed, the Part 2 Local Plan is unsound as it is not effective in providing for a range of housing sites across the district to provide for the needs of all communities over the plan period.

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.

To ensure that Objective 9 is met, the plan needs to make appropriate provision for housing in the more sustainable rural communities through specific allocations.

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	✓

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
Davidsons Developments has interests in land at Byfield, one of the identified Secondary Service Villages. It is important that they attend the examination to assist the Inspector in discussions in relation to the most sustainable approach to provision for housing in the rural areas.

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.	✓
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9. Signature		Date	4 th October 2018
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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 5th October 2018.
Responses received after this time will not be accepted.**



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3. To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
Chapter 4, Spatial Strategy		Policy SP1	

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

4. (1) Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	
4. (2) Compliant with the Duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	
4. (3) Sound?	Yes		No	<input checked="" type="checkbox"/>

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.

Policy SP1 sets out the overall spatial principles to guide sustainable development in the district. At sub-clause E, the policy refers to the protection and enhancement of existing services and facilities within the District's villages through allowing limited development to meet their identified housing needs.

The approach the Council has taken in proposing no further allocations within the rural part of the district means that there is a real risk that the housing needs within the rural communities over the plan period will not be provided for and, in the absence of further housing provision, some key local services and facilities could be under threat.

The constrained nature of the identified settlement limits means that the scope for further housing provision in these rural settlements through infill development will be limited.

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.

The Plan needs to make appropriate provision for additional housing in the more sustainable rural settlements to ensure that rural housing needs are addressed over the plan period.

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.

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

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
Davidsons Developments has interests in land at Byfield, one of the identified Secondary Service Villages. It is important that they attend the examination to assist the Inspector in discussions in relation to the most sustainable approach to provision for housing in the rural areas.

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.	✓
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3. To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
Chapter 5 – Development in the Rural Areas	Paragraph 5.2.05, Table 2		

4. Do you consider the Local Plan is: (please tick in the box below as appropriate and then provide details in the space below)				
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4. (2) Compliant with the Duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4. (3) Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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Table 2 of the Submission Draft Plan sets out the classification of Settlements in the Hierarchy, with 18 settlements identified as Secondary Service Villages, including Byfield. The identification of the settlement hierarchy has been informed by the Settlement Hierarchy Background Paper, July 2018. This provides a two-stage quantitative and qualitative assessment to establish the settlement hierarchy.

For Byfield, the stage 1 quantitative assessment identifies the settlement as a Primary Service Village, but it is demoted to a Secondary Service Village through the second stage qualitative assessment on the basis of limited access to employment and the size of the settlement.

It is considered that the quantitative analysis should be the primary consideration as this provides a clear and robust comparative appraisal of available services and facilities. The settlement hierarchy should be amended to identify Byfield as a Primary Service Village

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.

Amend settlement hierarchy to identify Byfield as a Primary Service Village.

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

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
Davidsons Developments has interests in land at Byfield, one of the identified Secondary Service Villages. It is important that they attend the examination to assist the Inspector in discussions in relation to the most sustainable approach to provision for housing in the rural areas.

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.

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3. To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
Chapter 5 – Development in the Rural Areas		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)				
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4. (2) Compliant with the Duty to co-operate?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4. (3) Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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.

Policy RA1 sets out the policy approach to development in identified Primary Service Villages. We have made separate representations arguing that Byfield should be included as a Primary Service Village. The first stage assessment in the Settlement Hierarchy Report identified the settlement as a Primary Service Village, but it was demoted to a Secondary Service Village in the second stage qualitative assessment. The available services and facilities in the village mean that it qualifies to be designated as a Primary Service Village.

The policy does not propose any allocations in either the Primary or Secondary Service Villages. This is an unduly restrictive approach. In reality, the opportunities for further provision within what are tightly drawn settlement limits will be limited. The proposed approach to limiting development in the Primary and Secondary Service Villages means that rural housing needs are unlikely to be met over the period to 2029.

We comment separately on the implications of this approach on the robustness of the plan and its ability to deliver the required number of houses in the plan period.

Policy RA2 should be amended to make specific allocations at the more sustainable rural villages, including Byfield, to help address the shortfalls in provision at Daventry Town to ensure that the overall housing requirement for the District is delivered and help to sustain rural services. The provision of smaller sites in the rural settlements are clearly attractive to the market and can be delivered effectively.

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.

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