

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 | | Brian |
| Last name | | Flynn |
| Job title (where relevant) | | Associate |
| Organisation (where relevant) | The Arnold Farming Partnership | Carter Jonas LLP |
| Address line 1 | c/o Agent | Carter Jonas LLP |
| Line 2 | | One Station Square |
| Line 3 | | |
| City/Town | | Cambridge |
| County | | Cambridgeshire |
| Postcode | | CB1 2GA |
| Telephone number | | 01223 326823 |
| Email (if provided we will always contact you this way) | | brian.flynn@carterjonas.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 |
|---|------------------|---------------|---------------|
| | | RA2 | |

| 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 | | No | |
| 4. (2) Compliant with the Duty to co-operate? | Yes | | No | |
| 4. (3) Sound? | Yes | | No | X |
| <p>4 (1) Please give details of why you consider the Local Plan is not legally compliant, be as precise as possible.</p> <p>4 (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.</p> <p>(continue on a separate sheet/expand box if necessary)</p> <p>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.</p> <p>This representation has been submitted on behalf of The Arnold Farming Partnership. Our client owns land off Old Road in Walgrave. A larger site off Old Road was promoted through the 'call for site's process – Ref. 154. This representation relates to a smaller site off Old Road currently used as a paddock – see attached location plan.</p> <p>In summary, we object to Policy RA2 (Secondary Service Villages) because it only seeks to retain the existing services and facilities in villages, but does not appear to support new services and facilities to make villages, such as Walgrave, more sustainable. We consider that Policy RA2 would not meet Objectives 10 and 11, which seek to support rural communities and rural diversification. Policy RA2 as currently drafted does not represent a positive approach and is not consistent with national policy. We have requested a minor change to the text of Policy RA2, which reflects national guidance relating to rural areas and the rural policies contained in the adopted West Northamptonshire Joint Core Strategy.</p> <p>We acknowledge that the Proposed Submission Local Plan Part 2 will be examined against NPPF1 under the transitional arrangements set out in Paragraph 214 the revised NPPF2. However, NPPF2 would be a material consideration in the determination of planning applications, and where relevant we refer to the relevant guidance in this document. In summary, NPPF2 also seeks to support the growth of villages and the development of additional services and facilities in rural areas. NPPF2 also introduces a new policy on entry level exception sites to deliver housing for first time buyers.</p> <p>We consider that land off Old Road in Walgrave – as identified on the attached location plan – is suitable</p> | | | | |

for a small farm and community shop, in conjunction with a small number of affordable and market housing to enable the delivery of the shop. There is no village shop in Walgrave, and it would be beneficial for residents and the sustainability of the village if a small shop selling convenience goods could be provided. The farm shop would be compatible with our client's farm business.

There are two objectives in the Proposed Submission Local Plan Part 2 which are relevant to Policy RA2 and these representations. Objective 10 - Protecting and Supporting Rural Communities states: *"To protect and support rural communities to ensure they thrive and remain vital"*, and Objective 11 - Rural Diversification and Employment states: *"To support rural diversification and rural employment opportunities, in particular those related to agriculture, horticulture and forestry"*.

Policy RA2 identifies the secondary service villages, permits development within the confines of the villages, allows development outside the confines of the villages in exceptional circumstances or where a local need can be demonstrated, includes criteria which supports development that is appropriate in scale to the role of a village, does not lead to the loss of services and facilities, and is accessible to the services and facilities in a village, and supports development provided for in a neighbourhood plan. However, the policy, as currently drafted does not appear to support the provision of new services and facilities. We agree with the classification of Walgrave as a secondary service village in the settlement hierarchy because of the range of services and facilities it contains. The village contains a primary school, village hall, public house serving food, post office, recreation area and allotments. The village is served by a daily bus service to Northampton and Kettering. However, Walgrave currently lacks a small convenience shop, which is a facility that would normally be provided in a secondary service village.

As set out below, we consider that Policy RA2 does not comply with national guidance relating to rural areas in the NPPF and the rural policies contained in the adopted West Northamptonshire Joint Core Strategy.

Section 3 of the NPPF1 seeks to support a prosperous rural economy. Paragraph 28 encourages sustainable new development in rural areas, supports the development and diversification of agricultural and rural businesses, and promotes the retention and development of local services and community facilities in villages including local shops. Paragraphs 54 and 55 of the NPPF1 relate to housing, and provides support for some market housing in rural areas to deliver additional affordable housing, and acknowledges the role of additional housing to enhance or maintain the vitality of rural communities. Paragraph 70 of the NPPF1 seeks to encourage the delivery of the social facilities and services needed by communities, including planning positively for facilities and services such as local shops which enhance the sustainability of those communities.

NPPF2 also seeks to support rural areas. Paragraph 78 of NPPF2 acknowledges the role of housing in rural areas to enhance and maintain the vitality of those communities and to support local services. It is expected that planning policies for rural areas will identify opportunities for villages to grow and thrive. Paragraph 83 expects planning policies to enable the retention and development of accessible local services including local shops. It is acknowledged in Paragraph 84 that development sites in rural areas may be adjacent or beyond existing settlements, but the use of previously developed land or sites which are well-related to settlements should be encouraged. It is likely that additional services and facilities, such as a small convenience shop, would occur on land outside the confines of existing villages, on the basis that there will be few infill opportunities within the village boundary and any that do exist would be brought forward solely for housing.

Policy R1 of the adopted West Northamptonshire Joint Core Strategy (December 2014) sets out the spatial strategy for the rural areas. The emerging Draft Settlements & Countryside Local Plan (Part 2) proposes no allocations for residential development in the rural area of Daventry because the housing target for the rural area derived from the Joint Core Strategy has already been met in the district. In our opinion, this proposed approach will lead to negative outcomes for the future supply of housing and affordable housing

in the villages, and in the context of Policy R1 it will not support existing services and facilities or encourage investment in new services and facilities which would make the villages more sustainable. Policy R1 does permit development outside the confines of a village in certain circumstances, including where it will enhance or maintain the vitality of rural communities or would contribute towards or improve the local economy. Policy R1 goes on to set out the circumstance where additional housing will be allowed once the rural housing target has been met (as has happened) including where housing would support the retention or improvement of local services. Policy R2 seeks to support development that sustains and enhances the rural economy, including farm diversification schemes involving small-scale business and commercial development.

In addition, we note that Policy R1 of the Joint Core Strategy and Policy RA2 of the Proposed Submission Local Plan Part 2 offers support for development permitted through a neighbourhood plan. However, there are no intentions to prepare a neighbourhood plan for Walgrave Parish, which means that future improvements to services and facilities in the village, such as a new village shop, will not be delivered through this method.

Therefore, we acknowledge that Policy RA2 seeks to protect existing services and facilities in the villages, but it provides no support for the delivery of additional services and facilities, such as a small convenience shop, that would improve the sustainability and vitality of villages. Paragraphs 28 and 70 of NPPF1 support the development of new local shops in rural areas. Policies R1 and R2 of the Joint Core Strategy support new development that would maintain or enhance the vitality of villages and the rural economy. We request that Policy RA2 is amended to reflect the support for development providing additional services and facilities in the rural area, and to reflect the positive support for rural area expressed in NPPF1 (and NPPF2) and the rural area policies of the Joint Core Strategy. These requested amendments would also deliver Objectives 10 and 11 of the Proposed Submission Local Plan Part 2. As currently drafted, it is not clear whether development that would deliver additional services and facilities in rural areas would be supported through Policy RA2.

The Sustainability Appraisal for Proposed Submission Local Plan Part 2 assesses the rural area policies as a group rather than separately. However, we do consider that the assessment of the rural area policies including Policy RA2 against Sustainability Appraisal Objective 11: Population and Social Deprivation could be improved with our requested changes i.e. it would ensure good access to services. The conclusions of the SA assessment for rural area policies including Policy RA2 is provided in SA Report Part 3B - Annex A: Matrices (see pg.21-22). We note that for most sustainability objectives Policy RA2 scores 'green - minor positive benefit'. We consider that clear and positive support for the delivery of additional services and facilities in the villages, as requested in our changes to Policy RA2, would have a 'green - major positive benefit' for the residents of the secondary service villages in terms of improving access to services.

(continue on a separate sheet/expand box if necessary)

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.

We request the following underlined changes to Criteria C of Policy RA2, as follows:

C. To ensure that the role of these villages is maintained, all development at the Secondary Service Villages shall meet the following criteria:

i. Be of an appropriate scale relative to its role as a Secondary Service village; and

ii. Not result in the loss of existing services and facilities important to the sustainability of the settlement and its role as a Secondary Service Village; or

iii. Provide a new service or facility important to the sustainability of a settlement, including in particular a small convenience/farm shop appropriate to the scale of the village. If enabling development is required to support the delivery of the new service or facility then evidence should be submitted to justify that approach; and

iv. Protect the form, character and setting of the village and areas of historic or environmental importance including those identified in conservation area appraisals and village design statements; and

v. Protect the integrity of garden or other open land that makes an important contribution to the form, character and setting of the settlement; and

vi. Be accessible by walking and cycling to the majority of services and facilities within the settlement; and

vii. Protect the amenity of existing residents.

(Continue on a separate sheet/expand box if necessary)

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 | X |
|--|--|--|----------|

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

To discuss and respond to questions on the above 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.

X

| | | | |
|---------------------|---|-------------|-----------------|
| 9. Signature | Carter Jonas LLP on behalf of The Arnold Farming Partnership | Date | 05/10/18 |
|---------------------|---|-------------|-----------------|

**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.**



Appledore

PS066
111.6m

112.8m

Hybank

Old Road

109.4m

El Sub Sta

WALKERS ACRE

The Site

110.0m

Pond

Pond

The Laurels

Cromwell House

Fairdune

Barleyton

Tanglewood

Wychwood

Sanderling

Carter Jonas

One Station Square, Cambridge CB1 2GA

J.A. Knight and Son Ltd.

Site at Old Road, Walgrave
Site Location Plan

Scale 1:1250 @ A4

January 2018