SETTLEMENTS AND COUNTRYSIDE LOCAL PLAN (PART 2) FOR DAVENTRY DISTRICT 2011-2029

HEARING STATEMENT - MATTER 2: SPATIAL STRATEGY

LAND WEST OF THE BANKS, LONG BUCKBY

ON BEHALF OF THE CO-OPERATIVE GROUP

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

Prepared by: Alex Bullock
The Co-Operative Group
Hearing Statement – Matter 2

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1. INTRODUCTION

1.1 This Hearing Statement is submitted on behalf of The Co-Operative Group (The Co-Op) in response to the Inspector’s Matters, Issues and Questions issued on 5th April 2019 in advance of the forthcoming hearing sessions for the Daventry Settlements and Countryside Local Plan (Part II) Examination.

1.2 The Co-Op has a land interest land to the west of The Banks, Long Buckby and has submitted representations at previous stages of the Part 2 Plan’s preparation in support of allocating land at this location.

1.3 A Site Location Plan of the site at Long Buckby is provided at Appendix 1.

APPENDIX 1 – SITE LOCATION PLAN

1.4 This Statement deals specifically with Matter 2: Spatial Strategy which is scheduled to be heard on Wednesday 12th June 2019. We respond to the relevant Inspector’s questions.
2. HEARING STATEMENT – MATTER 2

2.1 In respect of the Spatial Strategy the Inspector raises two issues, The Co-Op’s concerns relate to Issue 1, namely:

“Whether the Plan is consistent with the West Northamptonshire Joint Core Strategy Local Plan (Part 1) (JCS) and whether it has been positively prepared, is justified, effective and consistent with national policy in relation to the scale and distribution of development proposed.”

2.2 Accordingly, we respond to the relevant questions associated with Issue 1 only.

Question 7 – Is the methodology used to determine the settlement hierarchy in Policies RA1, RA2, RA3 and RA4, robust and consistent with the evidence? Are there any significant factors that indicate that any individual settlements should have been identified in a different tier of the settlement hierarchy? If so, what key factors and evidence informed the approach of the Plan to those settlements and their intended categorisation?

2.3 Policy RA1 – Primary Service Villages identifies six Primary Service Villages of which Long Buckby is one. Primary Service Villages are the largest settlements within the District after Daventry town. Accordingly, they are some of the most sustainable settlements given that they provide a range of services and facilities to meet the needs of their own residents and act as a focus for the surrounding rural settlements.

2.4 The Co-Op is supportive of the identification of Long Buckby within this category having considered the Quantitative (Stage 1) and Qualitative (Stage 2) assessments undertaken by the Council as set out within the Settlement Hierarchy Background Paper (GEN04)

2.5 It is clear from GEN04 that Long Buckby scores favourably across most categories including the Public Transport services. It is therefore wholly appropriate for the site to be identified within the second tier behind Daventry.
Question 8 – What is the approach of the Plan in terms of defining settlement boundaries or confines and development in rural areas? Do those approaches reflect the characteristics, roles and functions of individual settlements and other areas of Daventry District during the plan period?

2.6 The Policy approach for Primary Service Villages is to support development within the settlement boundary and to only grant planning permission for sites beyond the settlement boundary in exceptional circumstances.

2.7 It is recognised that growth at such settlements has already exceeded the minimum requirements for the Plan period. By contrast however, the expected growth at Daventry has been significantly delayed and this would appear to continue to be the case. The Council accepts this as set out in the Housing Background Paper Version 3 (Examination Document HOU1).

2.8 The Co-Op accepts that uncontrolled growth at such settlements would be harmful, however there are a myriad of other planning controls which could be adopted to control the level of development.

2.9 The Co-Op considers that the approach of development one side of a line on a plan is an antiquated form of development control and can artificially constrain development by simply being the wrong side, despite it being in all other respects sustainable.

2.10 Equally such a constrained approach makes it inherently difficult for Councils to adapt to change or delay during a plan period. We already know that Daventry has experienced significant delays with the strategic allocations, so this is already a significant issue for this Council.

2.11 The NPPF (2018) introduced the Housing Delivery Test (HDT) which as a tool seeks to ensure that delivery is consistent over any three-year period. Accordingly, any fluctuations in a shorter timeframe are made more acute by the shorter assessment period.

2.12 Paragraph 11 of the NPPF (footnote 7) advises that should delivery within any three-year period drop below 75% (and therefore substantially below requirement) this automatically triggers the tilted balance being engaged as a second route.
2.13 It should also be noted that other sanctions, in the form of the level of buffer to be applied.

2.14 The first HDT results indicate Daventry has a delivery at 110%, therefore significantly above. However, the initial assessment is made at a lower rate (i.e. 100 dwellings per annum lower) and as a result if the adopted requirement were applied the HDT result would be only 95%.

2.15 We know that delivery at Service Villages and rural settlements has been higher than expected and it is logical to assume that opportunities within a constrained boundary will be quickly diminished if that already hasn’t occurred.

2.16 This policy approach will prevent these sustainable settlements from being able to assist the Council in adapting to change and restrict their ability to provide a supporting role to Daventry (as the settlement hierarchy suggests).

2.17 The Co-Op would prefer to see the policy drafted much more positively to allow growth beyond the defined settlement boundaries. The policy could then set a specific quantum of development e.g. up to 50 dwellings and for the sites and to be well related to the existing built form.

2.18 We consider that it would be beneficial for the Council to soften its inflexible approach and we would suggest that the RA1 policy could be revised to allow growth directly adjacent to the settlement boundary where it met a range of criteria which would give the Council the same level of control that it currently seeks but also allows for flexibility should things change. For example:

RA1 – Primary Service Villages

The Primary Service Villages perform a crucial role in helping to provide an important range of services and facilities and access to employment opportunities to meet the day to day needs of the local communities which they serve. Primary Service Villages are identified as:

- Brixworth
- Crick
- Long Buckby
- Moulton
• Weedon
• Woodford Halse

Development at the Primary Service Villages will be located either within the confines of the village or located on land directly adjacent to the defined settlement boundary where all of the following criteria are met:

1. Be of an appropriate scale relative to its role as a Primary Service Village;
2. Supports the existing services and facilities important to the sustainability of the settlement;
3. Protects the form, character and setting of the village and areas of historic or environmental importance;
4. Protects the integrity of garden or other open land that makes an important contribution to the form, character and setting of the settlement;
5. Not result in the loss of land from employment use;
6. Be accessible by walking and cycling to the majority of services and facilities within the settlement; and
7. Protect the amenity of existing residents.

Development that is provided for in a made neighbourhood development plan will also be supported. Neighbourhood development plan policies and/or allocations should be in general conformity with the requirements of this Policy.

2.19 We consider that Service Villages, and indeed rural settlements more generally, must have consistent growth so as to ensure that existing services and facilities are at least maintained.

2.20 We would suggest that for settlements such as Long Buckby these are ideal locations where a certain quantum of growth would enable new services and facilities to be delivered which would further enhance their already significant sustainability credentials.
Therefore, whilst we accept that minimum growth levels have been met within this tier of settlements, artificially constraining their future growth is unhelpful, unsustainable and limits their future role.

9. **Is the wording of Policies RA1, RA2, RA3 and RA4 sufficiently clear for the purposes of decision-making? Is the wording consistent with other related policies of the Plan (i.e. Policies ENV7, ENV10, EC4, CW3)? Is the restriction that development outside of defined confines will only be acceptable in “exceptional circumstances” as set out in Policies RA1 and RA2, justified and consistent with national policy?**

Paragraph 59 of the National Planning Policy Framework (2018) reinforces the Government's objective of significantly boosting the supply of homes. It goes on to identify that it is important that a “sufficient amount and variety of land can come forward where it is needed.” (Our emphasis).

Paragraph 78 highlights that to promote sustainable development in rural areas, “housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”

Consistent with our view expressed in relation to Question 8, we consider that a ‘drawbridge’, in terms of housing numbers, shouldn’t be raised to the detriment of rural communities. The test should not simply be limited to a mantra which focusses simply on meeting a quota and the presumption is against further development. Such an approach is inflexible and pays limited regard to what is happening elsewhere in the District.

The Primary Service Villages are not small rural settlements, but locations which benefit from a significant range of services and facilities and as a result are highly sustainable.

Indeed, they act as a focus for nearby adjoining more rural settlements and as such meet the needs beyond those of their resident population.

We consider therefore that artificial constraint, as is currently proposed by Policy RA1, is not consistent with national guidance and would restrict otherwise sustainable development.
2.28 It is our opinion that Policy RA1 cannot reasonably be considered to be sound as it fails to be effective and consistent with national policy and should be amended as per our comments and suggestions made above.
APPENDIX 1

SITE LOCATION PLAN
Title number NN268601
Ordnance Survey map reference SP6267NF
Scale 1:1250 enlarged from 1:2500
Administrative area Northamptonshire:
Daventry

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