

**SETTLEMENTS AND COUNTRYSIDE LOCAL PLAN (PART 2) FOR DAVENTRY
DISTRICT - EXAMINATION**

HEARING STATEMENT FOR MATTER 2 – SPATIAL STRATEGY

MAY 2019

BY ROSCONN STRATEGIC LAND

Response to Matter 2 Questions 1 (as relevant):

RSL intend to rely principally on its representations made to the Submission Draft version of the Plan and do not therefore propose to repeat these comments within this hearing statement. As such, the following brief responses to relevant questions are to supplement our previous comments.

Question 1:

In the context of the housing requirement within the JCS, this must be treated as a minimum and not a ceiling, particularly in the context of the on-going housing crisis and the Government’s continued objective of significantly boosting the supply of housing (NPPF 59).

The JCS was adopted in 2014 and in the context of the Rural Areas, the intention was that the relevant authorities each prepare a Part 2 Local Plan in order to distribute the rural housing requirement, as detailed within Policy R1. Preparation of Daventry’s Part 2 Local Plan did not start until the publication of an Issues and Options Draft in 2016 and this delay and subsequent timescales to progress the Plan to submission have led, in the interim, to the rural housing requirement set out within the JCS having already been met, primarily through speculative developments outside the Plan-led system.

As demonstrated within the Housing Background Paper (ED: HOU01) and summarised in the table below, as a result the distribution of the Rural Area housing requirement has been relatively disproportionate across the District, with Weedon receiving significantly less growth compared to other PSVs. The disproportionately higher levels of growth in some PSVs is acknowledged at paragraph 5.2.18 of the Draft Plan.

Housing Background Paper December 2018

Primary Service Village	Completions and Expected Contributions up to 2022/2023
Brixworth	313
Crick	230
Long Buckby	306
Moulton	753
Woodford Halse	317
Weedon	92

Whilst the intention of Policy R1 is therefore founded on an objective to help meet the local needs of the rural areas focussed on the most sustainable locations, the fact that the housing requirement has already been met means that Weedon could effectively be subject to a housing moratorium. Whilst there is an identified local need for more market and affordable housing within this village, the ability to meet such needs is severely restricted, with little likelihood that such needs will be met. This is evidenced by the fact that recent permissions in Weedon since 2014 within the built-up area have generally fallen below the affordable housing threshold, delivering only 4 affordable housing units during this 5-year period. Whilst an updated Housing Needs Survey is currently awaited on the basis the Council maintain that the 2015 Survey is now out of date, latest evidence from the Council's Affordable Housing officer confirms there are currently 288 households on the Housing Register that require a home within Weedon.

RSL therefore consider that in the context of Weedon the scale of the housing requirement set out within the Plan is not consistent with the specific housing requirements within the JCS.

Question 2:

Policy R1 of the JCS identifies a number of guiding principles that should be used to inform the distribution of the housing requirement within the Rural Areas. The overarching objective is for the requirement to be distributed according to the local need of each village and their role within the hierarchy. Additional criteria include: (4) taking account of local needs for housing; and (10) enabling local communities to identify and meet their own local needs.

In view of the circumstances detailed above and within our previous representations regarding the housing need within Weedon, RSL consider that the Plan is not consistent with the JCS and the overall spatial strategy in that no provision is made to help meet the local housing needs of the local community, despite the evidence base clearly indicating there has been and continues to be an identified need which cannot realistically be met in another way.

RSL's site at Weedon is fully supported by the local community and deliverable in all other respects as demonstrated by the recent planning applications that have identified no other reasons for refusal other than the fact it was considered to be unacceptable in principle. RSL therefore maintain that the site should be allocated within the Plan in order to meet the objectives of the JCS.

Question 3:

Policy R1 of the JCS requires that development within the Rural Areas be guided by the settlement hierarchy, with Primary Service Villages (PSV) being the most sustainable locations and which are the most appropriate for accommodating local housing needs, as detailed at paragraph 16.12 of the JCS. Whilst Weedon has been confirmed as a PSV and therefore consistent with the JCS in terms of it being an appropriate and sustainable location for further growth in principle, this is meaningless in light of the lack of allocations at this particular village and the general restrictions preventing further housing growth that can deliver housing to meet local and affordable housing needs.

Question 8:

In the context of Weedon, RSL do not consider that the approach to defining settlement boundaries reflects the role and function of this particular settlement in that there is clearly a need for housing to both meet identified local needs and help support local services and facilities that are in decline. Provision should have been made to accommodate a site or sites on the edge of the settlement with a commensurate adjustment to the proposed settlement boundary to help address these specific issues in order to help support and maintain Weedon's role as a PSV, being a focus for service provision for its residents and those in the wider rural hinterland.

Question 9:

Whilst RSL would prefer to see a site allocated at Weedon to address local housing needs, it supports the general intention of Policy RA1 to allow housing development outside defined confines of settlements in exceptional circumstances. It would however assist to provide greater clarity regarding what would constitute 'exceptional circumstances' and incorporating this within the policy itself. For instance, new housing development has the potential to support a range of local services and facilities, but these are not defined beyond the primary school and primary health service. Other local services and facilities can be equally as important to the vitality and viability of a particularly PSV and this should be acknowledged.