

Daventry District Local Plan Examination Matters, Issues and Questions

Response to Matter 2 on behalf of Canton Ltd

May 2019

Issue 1 - 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.

Q4. *Does the Plan include sufficient flexibility and contingencies to take account of unexpected changes in circumstances, including the review of the JCS?*

The plan does not have built in flexibility to provide for changes in circumstances including the Joint Core Strategy review. Whilst the Plan takes a more flexible approach to infill development in the secondary service villages, including Creaton, submission policy RA2 is inflexible and too restrictive to the extent that the secondary service villages would be unable to meaningfully contribute to increased housing growth in the rural area highly likely required as part of the Joint Core Strategy review (recently underway). This will inevitably lead to the Part 2 Local Plan having to be reviewed in advance of when this is currently envisaged.

Q9. *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” set out in Policies RA1 and RA2, justified and consistent with national policy?*

Only permitting development in secondary service villages outside village confines in exceptional circumstances would not meet the objectives of Paragraph 55 of the National Planning Policy Statement 2012 which seeks to enhance or maintain the vitality of rural communities. It will also not help the Council maintain a five year housing supply when the review of the JCS is highly likely to establish a higher housing target for the area.

Q9. *Are policies NP1, SP1, RA1, RA2, RA3, RA4, RA5 and RA6 otherwise positively prepared, justified, effective and consistent with national policy?*

The proposed policy of effective restraint in the secondary service villages, through seeking to restrict development to within the existing confines (where opportunities for infill development is severely limited) brings about a number of issues.

Paragraph 47 of the NPPF seeks to significantly boost the supply of housing, including in our rural areas. The policy of restraint proposed by submission policy RA2, for villages such as Creaton, would not assist in meeting the national housing crisis, or achieve the NPPF’s objective of significantly boosting the supply of housing. I would reiterate again the point above about potential pressure for early review of the Plan in response to increased housing requirements through the Joint Core Strategy review reducing the effectiveness of submission policy RA2.

The absence of additional housing growth artificially raises property values in villages like Creaton. Unaffordable housing prices result in children leaving villages resulting in an aging population and potential loss of community spirit and cohesion. An aging population in turn can impact on the use of, and therefore the availability, of local services and facilities - for example, falling pupil number demand at schools and reduced demand for village recreational facilities including sports and public houses.

The policy of restraint triggers a need to have national and local policies for the specific provision of affordable housing, including on sites outside village confines - one of the exceptions provided for under submission policy RA2. A fundamental obstacle to the meaningful delivery of affordable housing is the absence of suitable land coming forward on the edge of villages from co-operative and largely philanthropic landowners. The effectiveness of affordable housing policy is reduced as a result.

The issues arising from an effective policy of restraint do not meet the NPPF's, or Core Strategy's objectives of enhancing or maintaining the vitality of rural communities. For the same reason, submission policy RA2 would not meet the objectives of supporting strong, vibrant and healthy communities, and in this respect fails one of the dimensions of the delivery of sustainable development set out in the NPPF.

The provision of limited housing growth, at an appropriate scale, on suitable sites on the edge of the secondary services villages, including Creaton, would assist in addressing the issues identified above. Submission policy RA.2 should be amended accordingly.



Woods Hardwick

Architecture | Engineering | Planning | Surveying

BEDFORD : HEAD OFFICE

15-17 Goldington Road
Bedford MK40 3NH
T: +44 (0) 1234 268862

BIRMINGHAM

Fort Dunlop, Fort Parkway
Birmingham B24 9FE
T: +44 (0) 0121 6297784

ONLINE

mail@woodshardwick.com
woodshardwick.com