

Mr. Ian Kemp
Programme Officer
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Worcestershire
WR9 7TA

25th June 2019

Dear Ian,

RE: Daventry Part 2 Local Plan Examination - Consultation regarding Proposed Modifications by DDC to Rural Development policies (RA1, RA2) and Policy EC4 Strategic Employment Areas.

Pedrix Ltd (respondent ref. PS096) is grateful for the opportunity to comment on the proposed modifications prepared last week by DDC in response to the Inspector's requests and suggestions following Matter 4 of the Examination (and parts of earlier Matters where relevant issues were also discussed). This letter contains a response on behalf of Pedrix which I trust you will pass on to Mr. Wildgoose.

In considering the proposed modifications I have worked directly with Mr. Rouse of Savills who was also actively involved in the discussion at the Matter 4 Hearing, and who raised many of the same or similar issues and concerns to those which form the basis of my written and verbal contributions to the Examination process. We have reached a shared view on DDC's modifications, including on some further proposed changes or amendments, enclosed. We trust that having a single shared response and suggested further changes from the 'developer interests' is of help to Mr. Wildgoose's further consideration of these issues.

As I hope is clear from the attached, there is much to welcome in the modifications proposed by the Council (DDC). The request made by Mr. Wildgoose at the Examination Hearing was for a more positive and flexible approach to economic development which better reflects both the Joint Core Strategy (JCS) and the NPPF. We welcome the way in which DDC has sought to provide a more appropriately positive policy and clearer policy context with reference to development which would enhance and improve the local economy. In particular, the new definitional examples of the types of development which may be appropriate outside of village confines added to **paragraph 5.2.19** (in support of Policy RA1) are positive and entirely appropriate, as is the newly proposed **criteria (E) inserted into Policy EC4**. Similarly, in general the thrust of **new paragraph 7.2.10** in support of Policy EC4 is also welcomed (subject to the comments and suggestions below).

Notwithstanding the above nascent support, as shown in the attached we feel that the modifications should go further to provide additional clarity, and to more fully meet the brief set by Mr. Wildgoose. In particular, inclusion of the word '*exceptionally*' in the context of **Policy RA1** would, in our view, continue to conflict with the policies of the NPPF, and fall-short of capturing the objectives and flexibility of the JCS. We have suggested an alternative form of wording (at **paragraph 5.2.19**) which seeks to respond to the discussion held under Matter 4 while retaining the intended spirit of DDC's modification. We believe this further amendment would improve the clarity of the text, supported by the criteria as proposed by DDC.

We also consider there would be significant merit in paragraph 5.2.19 being incorporated into criteria B of Policy RA1 (rather than located in supporting text), and would be keen for Mr. Wildgoose to consider recommending this further modification (which is also reflected in the attached proposed further changes).

We consider that the proposal to treat Primary and Secondary villages in the same way in terms of the potential for expansion of SEA's when conditions dictate creates possible conflicts with the

settlement hierarchy. We are not clear whether this was a deliberate or unintended consequence of the changes suggested by DDC. We suggest that **paragraph 5.2.23** should be modified (caveated) in a similar way to that proposed by DDC for the 'other villages' (at paragraph 5.2.25).

We have also suggested minor wording changes to the text of the new **paragraph 7.2.10**, again in a way which retains the intended spirit and emphasis of the proposed modifications by DDC.

Many of the suggested further amendments proposed in the attached are relatively minor, but we consider necessary, wording changes. The further modifications proposed would ensure improved consistency of language or clarity with regard to the terminology between these policies and other parts of the Part 2 Plan or JCS. These have been prepared jointly by Oxalis Planning and Savills for our respective clients given the commonality of much of our input to the Examination process, albeit that we ultimately have different motivations which are reflected in the attached suggestions.

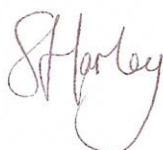
As referred to above, while there is much to welcome and support in as far as the DDC modifications have already gone, further amendments would ensure a clearer and more coherent set of operational planning policies with regard to economic development in the District. In summary, Pedrix's position on the modifications is:

- **Welcome and support** the additional examples included in the bullet points inserted into the criterion of paragraph 5.2.19;
- **Welcome and support** the cross-reference to paragraph 5.2.19 in part B of Policy RA1, but consider there would be merit in the paragraph forming part of the Policy itself (rather than supporting text);
- Further thought is required as to the appropriateness of the proposed references to 'exceptionally' in text and policy – see attached **suggested deletions and alternative wording**;
- **Welcome and support new paragraph 7.2.10, subject to wording amendments and clarifications** – see attached suggestions;
- **Welcome and support new criterion E of Policy EC4 – a minor wording amendment** to incorporate a reference to 'enhance' in criteria C (as included in Policy SP1) would improve consistency and clarity.

I hope that this letter, and the attached shared set of suggested modifications prepared jointly by myself and Mr, Rouse of Savills, is of help to the ongoing Examination process.

I would welcome the chance to provide further comments or input should this be of assistance.

Yours sincerely



Steve Harley BSocSc MPhil MRTPI
Associate Director