

## Response to EXAM Documents 15 to 17 – Savills for Stoford Gallan

Objector Reference PS106: Stoford Gallan

Thank you for your email enclosing the Council's suggested modifications to SP1, EC4 and Chapter 5 of the Local Plan. The policies and parts of the plan subject to these changes correlate closely with Stoford Gallan's Regulation 19 objections, we are grateful therefore, to have the opportunity to comment on the suggested modifications.

In considering the most appropriate wording to take account of Stoford Gallan's position, we have liaised with Oxalis Planning representing Pedrix Ltd (reference PS096), as we jointly considered that it would be helpful for the Inspector to receive a set of comments which present an agreed position between the two principal objectors in relation to employment matters.

Accordingly, please find attached a marked up version of relevant parts of the Council's suggested modifications. We have included only those parts of the Council's suggested modifications to which we propose a change should be made. In the enclosed document the Council's changes are shown in black type with strike through or underlining as marked by the Council. We have added proposed changes as red bold italic text for additions, and red strike through for deletions. We have included comments in the margin by way of brief explanation of the changes we are proposing. The same document is submitted by Stoford Gallan and Pedrix Ltd. The following explanation for the changes reflects Stoford Gallan's position only.

SP1 – consistent with the Regulation 19 objection it is considered that achievement of Objective 6 has particular spatial implications which should be reflected in the Spatial Strategy. The proposed additional text is consistent with Objective 6.

5.1.11 – changes are to make the supporting text positively framed and consistent with the changes proposed to 5.2.19 and RA1.

5.2.19 – changes are proposed to make the supporting text positively framed and unambiguous. The inclusion of bullet 4 which is consistent with JCS R1 and bullet 5 to ensure there is no internal conflict with EC4 (as amended) is helpful.

RA1 – the policy should be unambiguous and should be positively framed. It would be clearer if the policy sets out what is acceptable development, rather than deferring that explanation to the supporting text which has less status. The proposed changes seek to achieve this by importing the text from 5.2.19 as suggested by the Council, but with small additional changes to make the policy precise and positive. These changes are supported by the NPPF 2012 paragraphs 154 and 157. The change to RA1 is in addition to the change to 5.2.19. It is Stoford Gallan's preference that RA1 should be amended as proposed rather than there being reliance on 5.2.19 as amended.

5.2.23 – the changes suggested by the Council are consistent with those at 5.2.19. It is noted that the final point of Development which otherwise accords with EC4 is not included. This presumably reflects the location of all EC4 Strategic Employment Areas within or alongside Primary Service Villages. If not that may be an omission.

RA6 – proposed change to x to make it unambiguous and consistent with RA1 as Stoford Gallan propose it be changed.

7.2.10 – it is important that the role and function of strategic employment areas is allowed to evolve and change in response to market forces. As the role and function of each SEA is not defined in the Plan it is suggested that the supporting text supports appropriate growth or new functions as may be required, rather than just the specific existing role and function of that SEA.

EC4 – the addition of part E is helpful, but requires some further changes. As drafted it would not support sui generis employment uses and risks internal policy conflict with RA1 and ST2. As there is a need for additional lorry parking and associated facilities it is suggested that this use be referenced in part E of the policy. It is also noted that DIRFT is not a SEA identified under EC4 and as such Part E would not assist with development of the type envisaged which may be proposed on land related to DRIFT. Accordingly it is proposed that DIRFT is also specifically referenced to avoid doubt that the policy applies to that particularly strategic employment area.

I trust the Inspector will find these comments helpful, and I would be grateful if you would bring them to the Inspectors attention.

Yours sincerely

Paul

**Paul Rouse**  
**Director**  
**Planning**

## DAVENTRY PART 2 PLAN – EXAMINATION

EXAM 15, 16 and 17

PROPOSED MODIFICATIONS BY DDC – Proposed amendments of Stoford Gallan (reference PS106) and Oxalis Planning for Pedrix Ltd, (reference PS096)

JUNE 2019

### SUGGESTED FURTHER CHANGES:

Suggested additional text by the respondents is shown in **red bold italic text**. Suggested deletions are also shown in ~~red and struck through~~.

#### Policy SP1

##### SP1 – Daventry District Spatial Strategy

To ensure a sustainable pattern of development to meet the overall spatial strategy of the West Northamptonshire Joint Core Strategy, sustainable development in Daventry District will be guided by the following spatial principles:

A. Focusing development at Daventry town to deliver its regeneration and reinforce its role as the sub-regional centre of West Northamptonshire and its ability to support the surrounding communities;

B. Assisting with the delivery of ~~plan-led~~ development to meet Northampton's needs identified in the West Northamptonshire Joint Strategic Plan ~~where it is identified that this cannot be accommodated within the Northampton Related Development Area;~~

C. Promoting a vibrant economy through encouraging the regeneration of Daventry Town Centre and protecting and enhancing a network of identified employment areas at the town and across the rural area, ***strengthening and diversifying the local economy by taking advantage of the internationally well placed location, strategic transport network and proximity to London and Birmingham;***

D. Supporting the development of Daventry District's learning infrastructure to raise educational achievement and the skills base of our communities;

E. Protecting and enhancing existing services and facilities within the District's villages through allowing ~~limited~~ development to meet their identified housing needs;

F. Ensuring that development promotes healthy and active lifestyles through encouraging the use of sustainable transport modes and protecting and enhancing a network of green infrastructure and open space;

G. Protecting and enhancing the built and natural environment and the District's heritage assets, including protecting the Open Countryside;

H. ~~Prioritising~~ Encouraging and making an efficient use of previously developed land, including ensuring that unused and vacant buildings are brought back into a use appropriate to their location.

Paul Rouse 23/6/2019 16:21

**Comment [1]:** The additional text proposed is consistent with Objective 6 of the draft Local Plan Part 2, and is proposed because that objective has a specific spatial implication, preparing for development which has those connection attributes.

## Chapter 5 - Rural Areas and Policy RA1

5.1.11 Policy R2 provides clear guidance on the approach to be taken for proposals that support the rural economy. The policy supports proposals that create or safeguard jobs where they are of an appropriate scale for their location, respect the environmental quality and character of the rural area and protect the best and most versatile agricultural land. ~~The policy clearly sets out what types of development would be considered acceptable and it is not considered that further guidance on economic development in the rural areas is required in this plan.~~ As set out in policies RA1, RA2 and RA3 proposals outside of village confines will ~~only~~ be permitted, **as described in paragraph 5.2.19, exceptionally** where they would contribute towards or improve the local economy. Furthermore for Primary Service Villages proposals that are otherwise in accordance with policy EC4, Strategic Employment Areas, ~~will~~ **would** also be supported.

Paul Rouse 25/6/2019 08:28

**Comment [2]:** For consistency with changes proposed elsewhere and to make approach positive

Steve Harley 24/6/2019 09:29

**Deleted:**

Paul Rouse 25/6/2019 09:17

**Comment [3]:** If retained as an explanatory paragraph. Changes as marked. Stoford Gallan preference for text to be incorporated into policy RA1 as amended and set out below.

5.2.19 Taking forward policy R1 of the WNJCS, there may be scope for development outside of the confines ~~exceptionally~~ but only in exceptional. Typically this would include:

- Where the housing land supply is less than five years (three years where a neighbourhood development plan is in place that allocates sites for housing); or
- Where the development provided would clearly meet an identified local need, for housing this would be need Identified through an up-to-date Housing Needs Survey ~~carried out by Daventry District Council~~, or housing needs assessment; or
- Where a scheme is required to support an essential local service that has been demonstrated to be under threat, especially a primary school or primary health service; or
- Economic development that will enhance or maintain the vitality or sustainability of the Primary Service Village or would contribute towards and improve the local economy;  
or
- Development which otherwise accords with policy EC4.

Paul Rouse 23/6/2019 18:32

**Comment [4]:** For the avoidance of doubt bullets 4 and 5 are agreed by both Stoford Gallan and Pedrix Ltd.

### RA1 – Primary Service Villages

**B.** Development outside the defined confines will ~~only~~ be acceptable ~~only in exceptional circumstances (as set out in paragraph 5.2.19).~~ **where:**

~~Where~~ the housing land supply is less than five years (three years where a neighbourhood development plan is in place that allocates sites for housing) ; or

~~Where~~ the development provided would clearly meet an identified local need, for housing this would be need identified through an up-to-date Housing Needs ~~Survey carried out by Daventry District Council~~, or housing needs assessment; or

~~Where~~ a scheme is required to support an essential local service that has been demonstrated to be under threat, especially a primary school or primary health service; or

**It is** economic development that will enhance or maintain the vitality or sustainability of the Primary Service Village or would contribute towards and improve the local economy; or

**It is** ddevelopment which otherwise accords with policy EC4.

Paul Rouse 25/6/2019 08:52

**Comment [5]:** The text from 5.2.19 as amended here should be included within policy RA1 for the sake of clarity. The policy should be positively phrased as required by NPPF 2012 154, 157.

## Policy RA2

5.2.23 As with Primary Service Villages, taking forward policy R1 of the WNJCS there may exceptionally be scope for development outside of the confines. ***It is expected that suitable circumstances will occur less often than is envisaged in the Primary Service Villages.*** Typically these would ~~be~~ include;

- Where the housing land supply is less than five years (three years where a neighbourhood development plan is in place that allocates sites for housing); or
- Where the development provided would clearly meet an identified local need, for housing this would be need Identified through an up-to-date Housing Needs Survey carried out by Daventry District Council, or housing needs assessment; or
- Where a scheme is required to support an essential local service that has been demonstrated to be under threat, especially a primary school or primary health service; or
- Economic development that will enhance or maintain the vitality or sustainability of the Primary Service Village or would contribute towards and improve the local economy;

## RA6 – Open Countryside

The intrinsic character, beauty and tranquillity of the open countryside of the District will be protected.

To achieve this, in the open countryside outside the confines of villages, ~~only~~ the following forms of development only will be supported:

- i. Development, including the re-use or conversion of existing buildings, essential to ensure the continuing function of a rural business that meets the requirements of Policy HO6 (Rural Worker Dwelling); or
- ii. The replacement of an existing building of the same general size, massing and bulk predominantly on the same footprint, for the same use, that respects the character of its rural surroundings; or
- iii. Individual dwellings of exceptional quality or innovative design; or
- iv. The optimal viable use of a heritage asset or appropriate enabling development to secure the future use of a heritage asset that accords with ~~policy ENV7~~ Historic England guidance; or
- v. The re-use of redundant or disused buildings that lead to an enhancement to the immediate setting; or
- vi. Extensions to existing buildings that respect their form and character; or
- vii. Essential investment in infrastructure including utilities; or
- viii. Development for agriculture, equestrian, forestry, leisure, community or tourism use that is justified and of an appropriate scale for its location, and has no significant adverse impacts on its character, beauty and tranquillity; or
- ix. Economic development that otherwise accords with policy EC4 or policy R2 of the West Northamptonshire Joint Core Strategy; or
- x. Development acceptable ***exceptionally*** under policies RA1, RA2 and RA3

Paul Rouse 23/6/2019 18:40

**Comment [6]:** To make consistent with the change requested to RA1.

## Policy EC4 SEAs

7.2.10 There may be some scope for the expansion of the Strategic Employment Areas **and DIRFT** where it is demonstrated that further capacity is needed to support **appropriate growth at the specific role and function of** that employment area. **Such an example could include** when ~~there is an particular~~ existing business ~~that~~ is in need of additional space. **In such cases** Proposals will be expected to be justified by clear evidence. However it is also important that such proposals are of an appropriate scale, that there is insufficient capacity within the existing employment area in terms of either land or vacant units that could be **viably** redeveloped to accommodate the **needs proposed development**, and that the site is well-related to the existing Strategic Employment Area, forming a logical extension. The proposals will also need to be consistent with the other policies of this plan, in particular those relating to the environment.

Steve Harley 24/6/2019 09:16

**Comment [7]:** This change is consistent with the content of policy EC4 itself (new Criterion E).

## Modified EC4 new criterion 'E':

E. Further economic development (B1(b,c), B2 and B8 uses, **lorry parking and associated facilities in accordance with policy ST2** beyond the defined Strategic Employment Areas **and DIRFT (EC4 and EC10)** will be supported where;

- a. It is well-related to the existing Strategic Employment Area/**DIRFT**; and
- b. It is of an appropriate scale; and
- c. It is demonstrated that it is necessary to support **and enhance the role and function of** the Strategic Employment Area/**DIRFT**; and
- d. It is demonstrated that there is insufficient capacity within the Strategic Employment Area/**DIRFT** to accommodate the proposed development.

Paul Rouse 23/6/2019 19:24

**Comment [8]:** to ensure EC4 works with ST2 to support lorry parking

Paul Rouse 23/6/2019 19:17

**Comment [9]:** to make policy apply to of DIRFT in addition to EC4 SEA.

Steve Harley 21/6/2019 13:46

**Comment [10]:** Reference to 'enhance' is consistent with Policy SP1 criterion C.