Dear Sir / Madam

Representations to the South Northamptonshire Local Plan (Part 2) Submission Draft Consultation (Regulation 19) (4th October to 16th November 2018)

In this letter, representations are made to the South Northamptonshire Local Plan (Part 2) Submission Draft Regulation 19 consultation (the ‘Draft Submission’). These representations are made by Pegasus Group, on behalf of The Cureton Trust.

The Cureton Trust owns land to the north of Banbury Lane / east of Barley Hill, Culworth. Through previous representations to the Local Plan Part 2 we demonstrated that this site is suitable, available and feasible for residential development and therefore should be appropriately allocated for housing in the Part 2 Plan. We maintain the belief that the site would be a sustainable and sensitive addition to the settlement that would provide many benefits to the local area. Appended to this letter is an illustrative masterplan and red line boundary showing how a potential housing development could come forward on this site (Appendix A).

The purpose of this letter of representation is primarily to address the provisions of Policy SS1 ‘The Settlement Hierarchy’. The letter also addresses the implications of LH1 ‘Development within Town and Village Confines’ and; the benefits of allocating the site as appropriate for development to provide important benefits and improve the sustainability of Culworth. We have considered the Draft Submission Local Plan and various evidence base documents, including the ‘Settlement Hierarchy in South Northamptonshire’ report, which forms part of the evidence base to the Part 2 Plan. Regard is also paid to other relevant national and local policies.

It is considered that the policy does not fully address the spatial factors in the District, which consequently restricts the sustainable growth of the Secondary Service Villages.

Overarching the preparation of the Local Plan are National Policy tests that requires Local Plans to be legally compliant and sound. The tests of soundness are set out in National Planning Policy Framework (NPPF) paragraph 35:
• **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

• **Justified** – an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence;

• **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

• **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

**Policy Context**

The Draft Submission is intended to assist in the delivery of the spatial strategy set out in the West Northamptonshire Joint Core Strategy (WNJCS) Local Plan Part 1 adopted in December 2014. The WNJCS sets out the strategic long-term vision and objectives for the combined authorities of Northampton, Daventry and South Northamptonshire up to 2029. This includes where and how community facilities, strategic housing, employment and infrastructure is provided, as well as outlining where development should be limited.

Policy S3 of the WNJCS outlines the wider areas housing need and delivery strategy between 2011 and 2029. Of the 42,620 new dwellings required, 11,020 are to be provided in South Northamptonshire (612 per year), this has been broken down as follows:

- Brackley – c. 2,160
- Towcester – c. 2,650
- South Northamptonshire Rural Areas – c. 2,360
- Northampton Related Development Area – c. 3,850

Section 4 of the Draft Submission echoes this using a need figure of 6,320 whereas the delivery requirement is 7,170 new dwellings. The need figure had been derived from South Northamptonshire Objectively Assessed Need (OAN), it is recorded in Policy S3 in table 2 and the WNJCS Housing Need Trajectory. The variation in figures in due to existing commitments / delivery from 2011-2018 and the successful delivery of small-scale development across rural areas. As such, the Housing Delivery against OAN leaves a surplus provision of 704 dwellings, whereas the Housing Delivery against the WNJCS planned delivery requirement leaves a requirement of 146 dwellings.

In outlining the spatial strategy for the South Northamptonshire Rural Area, Policy R1 of the WNJCS states that the rural housing requirement distribution will be defined by the Local Plan Part 2. Policy R1 outlines the criteria the Draft Submission Rural Hierarchy preparation should consider and requirements for residential development to be acceptable in rural areas.
Policy SS1: Settlement Hierarchy

Policy SS1 of the Draft Submission sets out the proposed settlement hierarchy for South Northamptonshire in accordance with Policy R1 of the WNJCS. Policy SS1 proposes the following hierarchy:

1. Rural Service Centres (Brackley and Towcester);
2. Primary Service Villages (5 villages);
3. Secondary Service Villages (28 villages);
4. Small Villages (44 Villages), and;
5. Rural Areas (4 Villages – excluding more mentioned in paragraph 3.2.6 of the Draft Submission) (Open Countryside).

Secondary Service Villages have been separated into two ‘sub tiers’ having considered previous comments received through the consultation process. Villages in ‘Tier A’ are considered to be more sustainable than those in ‘Tier B’ because of existing services and facilities on offer. Large scale development in these villages is considered to be unsustainable, however, Policy SS1 suggests ‘Tier A’ Secondary Service Villages are ‘likely to be more suitable for limited development’.

While the introduction of ‘sub tiers’ is generally supported, there remains an imbalance in the settlement hierarchy with apparent contradictions between villages and their identified hierarchies. This imbalance essentially restricts growth to only 7 towns and villages out of a total of 108 (6%) counted in Section 3.2 of the Draft Submission. Furthermore, the hierarchy was generated using the WNJCS ‘Village Services and Facilities Technical Paper’ (2011), Pre-2010 Village Services Questionnaires and the undated ‘Settlement Hierarchy in South Northamptonshire’. While the documents contain useful data, these documents are somewhat outdated and do not adequately factor-in future growth opportunities. As such the findings used to define the settlement hierarchy risk creating stagnant rural communities where development and growth is restricted, which hinders key service provision, particularly in the absence of any Neighbourhood Plans.

While the move to identify more sustainable settlements is supportable, a more positive and proactive approach would be to broaden the spectrums for each tier. A higher number of Primary Service Villages should be identified out of the top scoring ‘Tier A’ Secondary Service Villages, e.g. ascending those that scored between 100 and 60. In turn a higher number of ‘Tier A’ Secondary Service Villages can be identified and acknowledged for their potential to support growth that can provide improved / increased services (e.g. between 59 and 40). Such growth in services can be utilised by surrounding villages that scored lower on the sustainability scale, thus achieving a more sustainable, balanced and positive distribution of development.

Within Culworth there is a Coffee Shop, Butcher, Public House, a Nursing Home and Primary School. Culworth is located between Banbury (c. 11km), Towcester (c. 14.9km) and Brackley (c. 10.9km), which are all within c. 30 minutes’ drive. Surrounding Culworth, which should be identified as a ‘Tier A’ Secondary Service Village, there are 7 Small Settlements and Open Countryside Hamlets within a 6km radius that would benefit from the sustainable growth of Culworth. The provision of limited housing development would provide further opportunities to support these existing services and to establish more services within the settlement confines. To focus limited growth here, in the form of small-
scale housing, would provide further opportunities to support in Culworth’s existing services; to establish more services within the settlement confines. The primary benefit being focused investment in local services that support the day-to-day needs of surrounding communities. Accordingly, Culworth (and other similar scoring Villages) should be identified as additional ‘Tier A’ Secondary Service Villages.

This would be in accordance with the NPPF 2018, where Paragraph 59 requires a sufficient amount and variety of land to come forward where it is needed and that the needs of groups with specific housing requirements are addressed. Paragraphs 77 and 78 promote sustainable development in rural areas to meet rural needs. Specifically, housing should be located where it will enhance or maintain the vitality of rural communities. It is therefore imperative that growth is encouraged across a wide range of settlements and therefore a positive approach should be taken through Policy SS1 to ensure that the housing needs of the rural areas are met.

Policy LH1: Development Within Town and Village Confines

For development in the Open Countryside to be acceptable, Policy LH1 of the Local Plan Part 2 Draft Submission requires development outside of village confines to be allocated in Neighbourhood Plans, for starter homes, to meet an exception test, for single dwellings, self / custom building or to meet the specific or affordable housing needs.

It is important that these confines do not immediately restrict a village’s ability to meet identified housing needs, particularly if there are sustainable sites that can meet that need. It is important to stress that the rural housing requirement is not a maximum figure; in accordance with national policy, housing requirement numbers should be kept up to date to reflect the dynamic nature of housing / demographic needs. This is particularly poignant as the WNJCS (paragraph 5.28) regards the South Northamptonshire supply as a minimum.

Despite this, the Submission Draft has chosen not to allocate specific housing sites on the basis that the WNJCS has already made provisions to meet its requirement. However, we recommend that the Local Authority take a more proactive approach to identify specific housing allocations to meet arising rural needs in accordance with NPPF paragraphs 77-79; and to achieve conformity with the WNJCS. While the Council can demonstrate a Housing Land Supply in excess of five years, it is important to continually manage this supply to ensure provision does not stagnate and emerging needs can continue to be met.

In the South Northamptonshire Local Plan Part 2 the proposed village boundary of Culworth is restrictive which consequently disallows Culworth to experience limited growth. The site boundary also differs from the Conservation Area Boundary, which surpasses the settlement boundary. Considering the above, the settlement boundary should be amended to incorporate the Conservation Area and plots of land in sustainable and suitable locations for development around the settlement; particularly land to the North of Banbury Lane / East of Barley Hill. This will then provide Culworth with the potential to establish key services resulting from small-scale housing growth. Other policies in the Draft Submission will then be best placed to ensure proposals respect local context and environmental considerations.

Land to the North of Banbury Lane / East of Barley Hill, Culworth

We write these representations to promote the land north of Banbury Lane / east of Barley Hill for residential development. We have previous provided a submission to the District
Council’s ‘call for sites’ which formed part of the Local Plan Part 2a Consultation, we then submitted representations to the ‘Issues and Options’ (Regulation 18) Consultation.

As discussed above and stated previously, we accept that the housing targets in the WNJCS are minimum requirements. Therefore, we recommend that the Local Plan Part 2 should allocate land for homes across a wide range of sustainable sites, as opposed to limiting sustainable rural growth as discussed above. It is considered that this approach will meet the NPPF’s requirement to plan positively, to provide greater flexibility and certainty that the South Northamptonshire’s housing needs can be met.

It is our position that villages should be required to contribute towards meeting local housing needs, as this will improve their own vitality and the surrounding communities. In accordance with paragraphs 77 and 78 of the NPPF, this is important to avoid impeding the growth of rural communities. Supporting development on the fringes of these settlements is an appropriate solution to ensure this (provided proposals meet local needs). Assessing local housing need is best carried out by local and parish councils. Such assessments can take account of settlement capacity, their aspirations for growth and the status of their facilities.

It is considered that the ‘Settlement Hierarchy in South Northamptonshire’ report and associated evidence is not up to date and is relatively stationary in its assessment of the settlements. Culworth is recognised as being within the top 50% of settlements considered in the assessment, which consequently recognises the village’s proximity to urban centres and local services, recreation facilities and communication infrastructure.

Contained in Appendix A of this letter is an illustrative masterplan and red line boundary showing how a potential development for housing could come forward on land north of Banbury Lane / east of Barley Hill. The illustrative masterplan shows a development envelope that fits in and sensitively extends the existing linear pattern of development of Culworth along Banbury Lane. Appropriate access could be gained via Banbury Lane linking to an internal hierarchy of roads and private drives. The development would be surrounded by a new area of public open space and public footpaths, which would act as an appropriate an attractive transition to the open countryside beyond. It is considered that development of this site provides the opportunity to create a welcoming and attractive entrance into Culworth from the east.

Considering this, we believe Culworth is a sustainable settlement. Therefore, it is appropriate for accommodating housing growth and meeting local housing needs. The land north of Banbury Lane / east of Barley Hill that we have been promoting throughout this process is an ideal site for development to meet additional market and affordable housing needs. It is also in an appropriate location to meet these needs whilst minimising the impacts on the more historic core of the village. Accordingly, the site is developable in line with national guidance. That is that it is suitable for residential use, available within a reasonable timescale and would be viable for development.

Specifically, the site is suitable as it is located within appropriate proximity to Culworth and there are no known planning constraints that would preclude development taking place. The site is available as there are no legal constraints that would delay development and the sites current use also would not restrict development commencing in a reasonable timescale. The site is viable for development as there will be limited initial costs that would affect the sites viability. It would be attractive for development for these purposes and could realistically be realised within 5 years. The site is therefore in accordance with the NPPF that seeks to promote small sites and requires sites to meet the above considerations.
**Concluding Statement**

The above amendments to Local Plan Part 2 Policies SS1 and LH1, and the promotion of the site for short-term development have been proposed to improve the sustainable balance of settlement growth. It is considered that there are significant benefits of following these suggestions and by including the site as a housing allocation in the Local Plan Part 2. The proposed amendments will promote the sustainable growth of rural settlements by permitting opportunities for investment and growth. By limiting the restrictive controls of a large portion of Secondary Service Villages and allowing smaller allocations for them; there is a greater chance of improving the vitality of smaller surrounding settlements and consequently the wider sustainability of South Northamptonshire’s rural areas. Such a strategy is considered by The Cureton Trust to better align the emerging Local Plan Part 2 to guidance contained within the National Planning Policy Framework and also the spatial strategy contained within the WNJCS.

Therefore, it is respectfully requested that our comments contained within this letter are taken on board and included in the final Submission Version of the Local Plan Part 2 to be submitted for Examination.

If you have any queries with regards to anything that is contained within these representations please do not hesitate to contact me.

Yours sincerely

STUART WELLS
Principal Planner
APPENDIX A
KEY

SITE LOCATION
(4.47 ACRES / 1.81 HECTARES)

PROPOSED RESIDENTIAL DEVELOPMENT

PUBLIC OPEN SPACE

EXISTING VEGETATION

PROPOSED VEGETATION

SUSTAINABLE URBAN DRAINAGE (SUDS)

PRIMARY STREET

SECONDARY STREET

LANES

KEY PRINCIPLES

1. PROPOSED NEW VEHICULAR ACCESS VIA BANBURY LANE;
2. PRINCIPAL STREET;
3. SOFT DEVELOPMENT EDGE RETAINING EXISTING HEDGEROW;
4. EXISTING URBAN FORM MIRRORED;
5. SOFT GREEN EDGE AND NEW HEDGEROW;
6. OUTWARD FACING FRONTAGES ACHIEVING NATURAL SURVEILLANCE;
7. STREET JUNCTURE WITH FOCAL BUILDING;
8. STREET WITH OUTWARD VIEW TOWARDS WIDER LANDSCAPE CONTEXT; AND
9. CONTINUATION OF EXISTING BUILDING LINE.

LAND OFF BANBURY LANE, CULWORTH - PROPOSED ILLUSTRATIVE MASTERPLAN