

This form has two parts:

Part A – contact details

Part B – your representation

Please fill in a separate sheet for each representation you wish to make.

Ref:

(for official use  
only)

## Part A

1. Personal Details*		2. Agent's Details (if applicable)
<i>* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in column 2.</i>		
<b>Title</b>	<b>Dr</b>	
<b>First name</b>	<b>Douglas</b>	
<b>Last name</b>	<b>McNab</b>	
<b>Job title (where relevant)</b>	<b>Forward Planning Manager</b>	
<b>Organisation (where relevant)</b>	<b>Department for Education</b>	
<b>Address line 1</b>	Operations Directorate	
<b>Line 2</b>	Sanctuary Buildings, Level 5	
<b>Line 3</b>	Great Smith Street	
<b>City/Town</b>	London	
<b>County</b>		
<b>Postcode</b>	SW1P 3BT	
<b>Telephone number</b>		
<b>Email (if provided we will always contact you this way)</b>	<a href="mailto:douglas.mcnab@education.gov.uk">douglas.mcnab@education.gov.uk</a>	

### Part B: Please use a separate sheet for each representation

Please note all comments will be made publically available. If you do not have sufficient space in the box please continue on a separate sheet or expand the box.

3. To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
		HO1, HO3	

4. Do you consider the Local Plan is: (please tick in the box below as appropriate and then provide details in the space below)				
4. (1) Legally compliant?	Yes		No	No comment
4. (2) Compliant with the Duty to co-operate?	Yes		No	No comment
4. (3) Sound?	Yes		No	<u>Tbc, see points below</u>

**4 (1) Please give details of why you consider the Local Plan is not legally compliant, be as precise as possible.**

n/a

**4 (2) Please give details of why you consider the Local Plan does not comply with the duty to co-operate, be as precise as possible.**

n/a

(continue on a separate sheet/expand box if necessary)

**4 (3) Please give details of why you consider the Local Plan is not sound, referring to the tests**

**of soundness as appropriate, be as precise as possible.**

Please see letter attached. Key points:

“It is not clear if the plan is sound with regard to planning for education infrastructure as the relevant evidence base has not been presented i.e. the updated infrastructure schedule. Therefore is not clear if the plan has been **positively prepared** based on a strategy which seeks to meet objectively assessed education infrastructure requirements.”

“Policies HO1 and HO3 require 2FE primary schools on specific development sites; these site allocations are welcomed by DfE in principle, but need to be **justified** based on evidence of existing capacity and need.”

(continue on a separate sheet/expand box if necessary)

**5. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at part 4(1) or 4(3) above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound.**

**It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please see letter attached. Proposed modifications include:

Need to present the updated infrastructure schedule.

“Policies HO1 and HO3 require 2FE primary schools on specific development sites; these site allocations are welcomed by DfE in principle, but need to be **justified** based on evidence of existing capacity and need.”

“As noted in our previous representation, it would be useful if these site allocations could clarify requirements for the delivery of the new schools, in particular the area of land required, so that the land take is clear for all stakeholders and can be priced into any land purchase. Additional guidance could also be provided on when the schools should be delivered to support housing growth, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of the school where need and demand indicates this might be necessary. The policies should also make it clear that the development will be required to contribute land and construction costs for the new school. These minor amendments would help to ensure that the education infrastructure needed to support growth is deliverable, thereby contributing to an **effective** plan.”

(Continue on a separate sheet/expand box if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matter and issues he/she identifies for examination.

6. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please tick as appropriate)			
No, I do not wish to participate at the oral examination	No	Yes, I wish to participate at the oral examination	

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
n/a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

8. Please tick the box if you wish to be notified of further progress of the Local Plan.	TICK
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9. Signature	D McNab	Date	2/10/18
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**Thank you for taking the time to complete the form.**  
**Please return it to the Local Strategy Service at Daventry District Council**  
**by 4.30pm on Friday 5<sup>th</sup> October 2018.**  
**Responses received after this time will not be accepted.**