

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> | | |
| Title | | Mr |
| First name | | Gary |
| Last name | | Stephens |
| Job title (where relevant) | | Planning Director |
| Organisation (where relevant) | Hallam Land Management | Marrons Planning |
| Address line 1 | | Bridgeway House, |
| Line 2 | | Bridgeway |
| Line 3 | | |
| City/Town | | Stratford Upon Avon |
| County | | Warwickshire |
| Postcode | | CV37 6YX |
| Telephone number | | 01789 339 963 |
| Email (if provided we will always contact you this way) | | gary.stephens@marrons-planning.co.uk |

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 |
|---|------------------|---------------|---------------|
| Spatial Strategy | | SP1 | |

| 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 | |
| 4. (2) Compliant with the Duty to co-operate? | Yes | | No | |
| 4. (3) Sound? | Yes | | No | X |
| 4 (1) Please give details of why you consider the Local Plan is not legally compliant, be as precise as possible. | | | | |
| - | | | | |
| 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. | | | | |
| - | | | | |
| (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.

The plan is unsound as it is not positively prepared nor consistent with national policy.

The Proposed Part 2 Local Plan has been prepared on the basis of conforming with the higher tier West Northamptonshire Joint Core Strategy, 2011 – 2029 (WNJCS). Therefore, the Part 2 Plan is meeting the housing requirement set out in the JCS. Hence suggestions by third parties to the previous iteration of the Part 2 plan that additional housing allocations should be made have been dismissed on the basis that a review or roll forward of the housing requirement is for the Joint Core Strategy and related documents.

The WNJCS states that a plan review to extend the plan period (potentially to 2036) will aim to start by 2017 and be adopted by 2020. However, since drafting, the Joint Planning Unit (which administered the JCS) has been dissolved in January 2018. The West Northamptonshire Councils have recently re-affirmed their commitment to working together through a Joint Planning Board for the same spatial area, albeit without executive powers.

It is inevitable that the tightly constrained Northampton Borough will continue to rely upon neighbouring local planning authorities in order to meet its local housing need. Furthermore, Daventry District Council recognises that the need to increase delivery is an important issue, particularly given the significant shortfall thus far in the Northampton Related Development Area (NRDA) [pg. 23 Summary of representations, response and action – Daventry District Part 2 Local Plan, June 2018].

Whilst the recently proposed unitary authority for West Northants could assist in expediting development plan preparation, the outcome and timescales for this are still unclear.

If the Part 2 Local Plan is adopted next year, the remaining plan period will only be for 10 years, and be based on an out of date housing requirement in the upper tier WNJCS. This is clearly out of kilter with the aims of the national policy for plan preparation [para 157, NPPF 2012, para 22, NPPF 2018].

Given the above, a commitment to an early review of the development plan should be enshrined in policy in the proposed part 2 Local Plan. This would provide greater certainty that a clear commitment to a review will happen at the specified time and will be achieved in a timely manner. In effect it is simply affirming commitments the Council have already made. This was the conclusion reached by the Inspector examining the Site Allocations Document for South Staffordshire (SAD), which was subservient to the Black Country Joint Core Strategy. South Staffordshire's SAD also faced similar issues in terms of an out of date housing requirement and housing overspill from elsewhere. The recently adopted SAD's first policy therefore is a commitment to a Local Plan review to be submitted for examination by the end of 2021.

(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 cooperate 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.

Amend SP1 to include a review mechanism with specific timescales for submission for examination as set out above.

(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 | | Yes, I wish to participate at the oral examination | X |
|--|--|--|----------|

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

To set objections in full due to their strategic nature.



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 |
|---|------------------|---------------|---------------|
| | | RA1 | |

| 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 | |
| 4. (2) Compliant with the Duty to co-operate? | Yes | | No | |
| 4. (3) Sound? | Yes | | No | X |

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

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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.

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(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.

The plan is unsound as it is not positively prepared nor consistent with national policy.

As suggested in other representations made against this policy, Policy SP1 should be amended to include a clear commitment to an early review of the Local Plan, and this is in part necessary to address the slow delivery of sites in particular those within the NRDA.

However, during the time taken to prepare a new Local Plan, the Council's five year housing land supply could come under significant strain. As the Plan is currently proposed, sites outside of the settlement boundaries of Primary Service Villages defined in RA1 may only be deemed suitable for development if a five year housing land supply cannot be demonstrated. This could potentially lead to speculative development proposals contrary to the plan-led system advocated by the NPPF. To ensure that only plan-led development comes forward, it is considered more appropriate to identify reserve sites to provide more certainty about where growth will be directed in such circumstances.

This approach would also accord with the proposed Policy SP1 as it could assist with the delivery of plan led development where it is identified that this cannot be accommodated within the NRDA. The Council's evidence is sufficient enough to identify reserve sites around Primary Service Villages, and it is considered that some PSVs, such as Long Buckby, would be well placed to meet needs sustainably given their sustainable transport links and location.

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.

Identify Reserve Sites to come forward should the housing land supply identified in the plan falter.

(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 | | Yes , I wish to participate at the oral examination | X |
|--|--|--|----------|

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

To set objections in full due to their strategic nature.

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. | X |
|---|---|

| | | | |
|---------------------|----------------------|-------------|------------------------------------|
| 9. Signature | Gary Stephens | Date | 5th October 2018 |
|---------------------|----------------------|-------------|------------------------------------|

**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 5th October 2018.
Responses received after this time will not be accepted.**