

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>Messrs</b>	<b>Mr</b>
<b>First name</b>		<b>R</b>
<b>Last name</b>	<b>Wareing-Russell and Russell</b>	<b>Bradshaw</b>
<b>Job title (where relevant)</b>		<b>Senior Planner</b>
<b>Organisation (where relevant)</b>		<b>Howkins &amp; Harrison</b>
<b>Address line 1</b>		<b>7-11 Albert Street</b>
<b>Line 2</b>		
<b>Line 3</b>		<b>Rugby</b>
<b>City/Town</b>		
<b>County</b>		
<b>Postcode</b>		<b>CV21 2RX</b>
<b>Telephone number</b>		<b>01788 564676</b>
<b>Email (if provided we will always contact you this way)</b>		<b>rhys.bradshaw@howkins@harrison.co.uk</b>

### 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
Chapter 1: Intro		NP1	

**4. Do you consider the Local Plan is:**  
(please tick in the box below as appropriate and then provide details in the space below)

<b>4. (1) Legally compliant?</b>	<b>Yes</b>		<b>No</b>	
<b>4. (2) Compliant with the Duty to co-operate?</b>	<b>Yes</b>		<b>No</b>	
<b>4. (3) Sound?</b>	<b>Yes</b>		<b>No</b>	✓

**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.**

**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.**

Policy NP1 of the LPP2 identifies criteria (limbs ‘i’ to ‘v’) for community led planning and neighbourhood development planning. Overall, we are supportive of the Council’s approach to encourage neighbourhood development planning in accordance with the Government’s aspirations and national planning policy.

Limb ‘iii’ of Policy NP1 states that “allocations (in Neighbourhood Development Plans) should comply with the criteria set out in the relevant settlement hierarchy policies of this Local Plan.” The criteria contained within the settlement hierarchy policies under the LPP2 restrict residential development outside of village boundaries.

The NPPF (it is likely that the LPP2 will be submitted before 24th January 2019 and so the policies in the NPPF dated March 2012 will apply to the LPP2) states that neighbourhood plans will be able to shape and direct sustainable development in their area (paragraph 184). Therefore, local communities should be able to prepare Neighbourhood Development Plans that allocate housing growth outside of the village boundaries. Local communities should not be restricted to identifying development only within their village confines. We therefore object to this sentence under Policy NP1 and request that it is omitted from the policy.

In view of the above, we consider that part of Policy NP1 is unsound as the policy is inconsistent with national policy.

**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.

The wording "allocations should comply with the criteria set out in the relevant settlement hierarchy policies of this Local Plan" should be omitted from the policy.

**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.

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

To outline objections in full.

### 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
Chapter 3: Vision and Objectives			

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	✓
<p><b>4 (1) Please give details of why you consider the Local Plan is not legally compliant, be as precise as possible.</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p>It is important to recognise the housing requirements in both the vision and in the objectives. We have concerns that the vision does not sufficiently consider the necessary growth implications for the District's rural area and does not sufficiently identify the settlements in the rural area to which the amount of growth will be directed.</p> <p>Objective 9 in the LPP2 seeks to "provide a range of housing in sustainable locations to ensure all residents have access to a home that they can afford and that meets their needs." However, "housing development will be focused at the most sustainable location of Daventry with limited development in the rural area to provide for local needs and support local services." As currently drafted, the vision and objectives do not include the rural area's growth requirements and instead only focuses on additional growth at Daventry town. No additional residential land has been identified for the rural area of the District.</p> <p>Whilst we support some of the objectives intended to deliver the vision, we are concerned that the objectives and in particularly Objective 9 restricts growth in the District's rural area to "limited development". Further consideration of this matter is discussed below in relation to development in the District's rural area.</p>				
<p><b>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</b></p>				

**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.**

**Vision and Objective 9:** The vision and objective should be amended to consider the necessary growth implications for Daventry District's rural area and the sufficient amount of growth for settlements in the rural area.

**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.

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**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

✓

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

To outline objections in full.

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

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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	✓

**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.**

**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.**

We note that the Council consider that to help deliver the vision and objectives of LPP2, an over-arching spatial policy should be followed in guiding development proposals across the District, which closely follows the spatial strategy identified in Policy S1 of the WNJCS adopted December 2014. This seeks to focus development in and adjoining the sub-regional centre of Daventry town and limit development in the rural areas.

Policy S3 of the WNJCS sets out the scale and distribution of housing development of about 42,620 net additional dwellings during the plan period 2011 to 2029 across West Northamptonshire. In respect of Daventry District, the WNJCS sets out that about 12,730 dwellings will be provided, distributed as follows:

- Daventry Town – about 4,620 dwellings.
- Daventry Rural Areas – about 2,360 dwellings.
- Northampton Related Development Area – about 5,750 dwellings.

We note that the Council consider (paragraph 4.1.05 of LPP2) it is crucial that the over-arching spatial strategy of the WNJCS is carried forward, and that with respect to the Northampton Related Development Area, it is important that Northampton's needs are met in a plan-led manner to avoid piecemeal development. A pattern of piecemeal development in the District is not considered to be sustainable as this can increase the load on the current road and utilities infrastructure, without bringing forward the economies of scale that would make the provision of

further infrastructure cost effective and therefore deliverable.

Policy SP1 of the LPP2 states that to ensure a sustainable pattern of development to meet the overall spatial strategy of the WNJCS, sustainable development in Daventry District will be guided by the spatial principles as set out under Policy SP1. This includes: 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; and B) assisting with the delivery of plan-led development to meet Northampton's needs where it is identified that this cannot be accommodated within the Northampton Related Development Area.

We acknowledge that the WNJCS is the key driver to identifying the scale and distribution of housing development for West Northamptonshire including Daventry District. However, we are concerned that Policy SP1 of the LPP2 restricts necessary housing growth in Daventry District's rural area. Further consideration of this matter is discussed below in relation to development in the rural areas.

We consider that Policy SP1 and the supporting text is unsound as LPP2 has not been positively prepared based on meeting current and future housing requirements.

**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.**

The policy and supporting text should be amended to consider the necessary growth implications for Daventry District's rural area.

**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

✓

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

To outline objections in full.

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3. To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
Chapter 5: Development in the Rural Areas			

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	✓
<p><b>4 (1) Please give details of why you consider the Local Plan is not legally compliant, be as precise as possible.</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p>We note that the Council consider (paragraph 5.1.03 of the LPP2) that the housing requirement under the WNJCS, as set out in the Council’s Housing Land Availability Report 2017, has been exceeded by 520 dwellings as at 1st April 2017. We also note that in the more recent Housing Land Availability Report 2018, it is stated that the requirement for the rural areas has been exceeded, as at 1st April 2018 by 613 dwellings with 11 years of the plan period remaining. The Council consider that, following the grant of planning consent for a number of sites, the housing land supply position has improved significantly and they can demonstrate a land supply in excess of 5 years.</p> <p>The Council consider (paragraph 5.1.04 of the LPP2) that if there was to be a continued focus on the rural areas rather than Daventry town under the current spatial distribution of permissions, this approach would significantly undermine the spatial strategy of the WNJCS. Therefore, managing any further development in the rural areas is clearly an important issue. Further to this, the Council therefore consider (paragraph 5.1.05) that it is not necessary to make any allocation for development in the rural areas in this plan or to identify specific targets for individual settlements. However, further allocations could come forward through neighbourhood development plans or exception sites.</p> <p>We consider that the Council cannot assert that further allocations could come forward through neighbourhood development plans or exception sites without this undermining the spatial strategy in the WNJCS. Furthermore, the Council have not indicated the number of dwellings that could come forward under Neighbourhood Plan allocations and/or exception sites in the rural area and the specific settlements to which the amount of growth will be directed through these Neighbourhood Plan allocations and/or exception sites.</p>				

The housing requirements and the Objectively Assessed Need (OAN) set out in the WNJCS are underpinned by the West Northamptonshire Strategic Housing Market Assessment (SHMA) 2009 (Report of Study Findings, May 2010) prepared by Opinion Research Services. The housing requirements and OAN in the SHMA are based on the East Midlands Regional Plan (RSS) published March 2009. The RSS was revoked by the Secretary of State on 20th March 2013.

The WNJCS was adopted in December 2014. The OAN identified in the WNJCS is not a maximum figure. Furthermore, a condition of the WNJCS being found sound by the Examination Inspector was that a review should be undertaken and the plan be adopted by 2020. This will need to be underpinned by a review of the technical evidence including a review of the OAN for West Northamptonshire. At the time of writing, the papers for the DDC Strategy Group held on 13th September 2018 sought agreement to the statement of common ground, Local Development Scheme and memorandum of cooperation for the proposed arrangements in respect of the West Northamptonshire Strategic Plan. The proposed timescales were identified as follows: Reg 18 consultation due April 2018 and September 2019, Reg 19 due December 2020, submission to SoS in April 2021, Examination in Public from September 2021 and adoption of the plan in January 2022.

The Housing White Paper (published 7th February 2017) set out how the Government will deliver their 2015 commitment of a million new homes by 2020, and want to supply a further half a million by 2022. It is also relevant to note that the Government's 'Planning for the right homes in the right place' consultation (published 14th September 2017) identified indicative assessment of housing need based on the proposed standard methodology from the current local assessment of housing need. The measures in this consultation will help ensure that local authorities plan for the right homes in the right places through up-to-date Local Plans. The Government's consultation sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. The housing need for West Northamptonshire authorities based on the standard methodology would need to be considered as part of the preparation of the West Northamptonshire Strategic Plan. The Government's consultation sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth.

Paragraph 156 of the NPPF requires local planning authorities to set out the strategic policies for the area in the Local Plan, including strategic policies to deliver the homes and jobs needed in the area. Furthermore, paragraph 157 of the NPPF requires, crucially, Local Plan to plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework. In addition, paragraph 158 requires Local Plan's to be based on adequate, up-to-date and relevant evidence and paragraph 159 requires local planning authorities to have a clear understanding of housing needs in their area and should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs.

The housing provision in the WNJCS is based on an evidence base that has been revoked under the RSS and the OAN is fast approaching its "sell-by date". One can deduce that the OAN contained within the WNJCS should be considered out-of-date by December 2019, which is five-years from adoption of the plan (less than two years from now). Whilst the Council consider that they have exceeded the WNJCS housing requirements by 613 dwellings (as at 1st April 2018) with 11 years of the plan period remaining, the reality is such that the Council should, jointly with the other West Northamptonshire authorities, begin a review of the strategic policies for West Northamptonshire now to allow sufficient time for the review, preparation of a new plan and then adoption by 2020. It is clear however from the DDC Strategy Group held on 13th September

2018 that adoption of the plan is not likely to be until January 2022. This could mean a gap of approximately two years whereby the strategic policies in the WNJCS are out-of-date until the West Northamptonshire Strategic Plan is adopted.

We consider that the approach taken by the Council to identifying additional housing growth at Daventry town and no housing at the District's rural area is not a positive approach to plan-making based on a strategy which seeks to meet the objectively assessed need of the WNJCS, is not justified by a robust evidence base and is inconsistent with the requirements of the NPPF.

We consider that the Council should take a more proactive approach to identifying additional housing in the Local Plan Part 2 based on potential additional housing need from more up-to-date evidence base that will underpin the preparation of the West Northamptonshire Strategic Plan. The Council should seek to identify additional housing allocation in the LPP2 in the District's rural area. This includes identifying the amount of growth specific to individual settlements within the rural area.

A more positive approach will help to ensure continued housing delivery and a five-year housing land supply position is maintained as the Council progress towards the preparation of the West Northamptonshire Strategic Plan. Smaller, more deliverable sites in the District's rural area should be allocated for housing as they can meet housing need and delivery in the short term. These smaller sites are much less reliant (than larger sites) on significant infrastructure in order for them to come forward. The LPP2 as drafted does not provide flexibility in the development strategy and we consider that the approach to identifying growth in the rural area (e.g. no growth) should be adjusted accordingly.

**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.**

The Council should consider the necessary growth implications for Daventry District's rural area and the sufficient amount of growth for settlements in the rural area. Allocate additional housing in the District's rural area in LPP2. Smaller sites should be allocated for housing as they are more deliverable, can meet housing need in the short term and are not reliant on significant infrastructure in order for them to come forward.

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

To outline objections in full.

### 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
Primary Service Villages		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	✓
<p><b>4 (1) Please give details of why you consider the Local Plan is not legally compliant, be as precise as possible.</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p>We note that the LPP2 identifies a settlement hierarchy for the rural area. Table 2 identifies where each village sits within the settlement hierarchy and policies RA1 to RA4 provide more detail for each of these categories.</p> <p>Policy RA1 defines Primary Service Villages as performing a crucial role in helping to provide an important range of services and facilities and access to employment opportunities to meet the day to day needs of the local communities which they serve.</p> <p>The Primary Service Villages are identified as: Brixworth, Crick, Long Buckby, Moulton, Weedon and Woodford Halse. We agree that Weedon performs the function of a Primary Services Village.</p> <p>LPP2 should include provision for a review of the village confines to enable identification of land for residential and associated development other than land which might be identified within existing and emerging Neighbourhood Plans.</p>				
<p><b>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.</b></p> <p><b>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.</b></p> <p>Policy RA1 Primary Service Villages should be amended to consider the necessary growth</p>				

implications for Daventry District's rural area.

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**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	✓
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To outline objections in full.

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3. To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
Chapter 6: Meeting the District's Housing Needs			

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	✓
<p><b>4 (1) Please give details of why you consider the Local Plan is not legally compliant, be as precise as possible.</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p>We note that the LPP2 identifies Daventry town as the focus for housing growth within the District as a sub-regional centre across West Northamptonshire. Policy S3 of the WNJCS identifies the need to deliver about 12,730 dwellings in Daventry District (during the period 2011 to 2029) and that Daventry town will deliver about 4,620 dwellings from this requirement. The Council consider that as at 1st April 2018, a total of 2,581 dwellings had been delivered against the WNJCS requirement of 2,345 dwellings for the period 2011-2018. However, the majority of this has been delivered in the rural areas.</p> <p>The LPP2 sets out the current position in terms of delivery for the main sites in Daventry town. We note the Council acknowledge that the Daventry North East Sustainable Urban Extension (SUE) allocation in the WNJCS is unlikely to deliver 2,600 dwellings as envisaged over the plan period and this has been revised to 1,400 dwellings as set out in the 2018 Housing Land Availability report. The Council identified a residual requirement of 511 dwellings to be allocated in the LPP2. However, taking into account the slippage in delivery of Daventry North East SUE, and other updates, this requirement has now increased as stated at paragraph 6.1.09 of the LPP2.</p> <p>Table 4 of the LPP2 identifies the existing commitments for Daventry town as 3,314 dwellings and remaining requirement as 1,266 dwellings (as at 1st April 2018). Table 4 identifies proposed allocations for 1,570 dwellings, which equates to 304 dwellings supply in excess of WNJCS requirement as of 1st April 2018.</p>				

We object to the Council's approach to only allocating additional housing growth in Daventry town in order to meet the District's housing needs. Allocating additional housing growth through large allocations at Daventry at other parts of the town is unlikely to help meet the District's shortfall in the short-term. It is likely that these allocations will be reliant on significant infrastructure coming forward in order for them to be delivered. It is therefore not a sustainable approach to identify additional housing growth over and above the Daventry North East SUE.

An alternative approach to meeting the District's short-term housing need must be taken. We note that there are other local planning authorities, for example Rushcliffe Borough Council, who have recently submitted a Part 2 Local Plan have identified additional growth beyond the adopted Part 1 Local Plan (Core Strategy) at other sustainable settlements. This is because the strategic allocations at key settlements are not delivering the housing growth originally anticipated under the Core Strategy. Under Policy SP1 of the LPP2 and Policy S3 of the WNJCS of the WNJCS, a figure of about 2,360 dwellings is identified for Daventry Rural Areas. This is not a ceiling figure and the Council is able to allocate further housing growth at Daventry Rural Areas, similarly to the approach taken by some other Local Planning Authorities.

As discussed previously in this representation, the Council should allocate smaller, more deliverable sites in the District under the LPP2 as this will help resolve housing need and delivery in the short-term. Smaller sites in sustainable villages in the rural area should be allocated for development as they are much less reliant on significant infrastructure and will contribute towards continued housing delivery across the District as a whole and ensuring the Council can maintain a five-year housing land supply position prior to the adoption of the West Northamptonshire Strategic Plan. Housing allocations in the rural area assist with sustaining rural amenities and services, which is increasingly important for settlements that have an ageing and/or declining population.

We reiterate that the approach taken by the Council to identifying additional housing growth at Daventry town and no housing at the District's rural area is not a positive approach to plan-making based on a strategy which seeks to meet the objectively assessed need of the WNJCS, is not justified by a robust evidence base and is inconsistent with the requirements of the NPPF.

**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.**

The Council should allocate smaller sites in sustainable villages in the District's rural area as they can meet housing need in the short term, are not reliant on significant infrastructure in order for them to come forward and assist with sustaining rural amenities and services.

**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.

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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	✓

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

**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.	<input checked="" type="checkbox"/>
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9. Signature	Howkins & Harrison	Date	03.10.2018
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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.**