

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 | Mr |
| First name | David | Rob |
| Last name | Joseph | White |
| Job title (where relevant) | | Director |
| Organisation (where relevant) | Bloor Homes South Midlands | White Peak Planning |
| Address line 1 | | Didsbury Business Centre |
| Line 2 | | 137 Barlow Moor Road |
| Line 3 | | |
| City/Town | | Manchester |
| County | | |
| Postcode | | M20 2PW |
| Telephone number | | 0845 034 7323 |
| Email (if provided we will always contact you this way) | | robw@whitepeakplanning.co.uk |

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 requirements of this policy (previously HO7) were identified as having a cost impact in the Viability Assessment (Nov 2017), however, the sites within the Northampton Related Development Area (NRDA) were not specifically tested in the assessment. On this basis, the policy is considered to be unsound in the absence of viability testing.

Subject to viability testing by Daventry District Council and to ensure that accordance with this policy is justified at the planning application stage, we recommend that the wording of the policy is amended to:

'D) To meet needs of the District's residents and to deliver dwellings which are capable of meeting peoples' changing circumstances over their lifetime the following standards will need to be met where practical and viable.'

Paragraph D(i) of the policy also requires 5% of market dwellings and 10% of affordable dwellings to meet Part M4(3) of the Building Regulations. Paragraph 6.5.09 refers to the need for 'wheelchair accessible' properties only rather than 'wheelchair adaptable' and therefore, it is inferred that the 5% and 10% requirements relate to 'wheelchair accessible' dwellings.

Paragraph 56-009-20150327 of the National Planning Practice Guidance states that: *'Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.'*

To be consistent with national planning guidance and ensure the delivery of 'wheelchair accessible' dwellings that meet Part M4(3), we recommend amending the wording of the policy to remove the requirement for 5% of market dwellings to meet Part M4(3) and increase the percentage of affordable dwellings to 15%.

(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.

See Section 4(3) 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. |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| As policies within the Local Plan (Part 2) will apply to the proposed Strategic Urban Extensions (SUEs) within the NRDA, the cost impacts of these policies should be tested as part of the Council's Viability Assessment. |

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 | | Date | 04/10/18 |
|--------------|--|------|----------|

**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.**

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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 requirements of this policy (previously CF2) were identified as having a cost impact in the Viability Assessment (Nov 2017), however, the sites within the Northampton Related Development Area (NRDA) were not specifically tested in the assessment. On this basis, the policy is considered to be unsound in the absence of viability testing.

Section B of Policy CW2 includes revised open space standards for new residential development within the NRDA. Paragraph 11.9 of the Nortoft report for Daventry titled *'Planning the future of open space, sport and recreation in West Northamptonshire, Part 4: Open Spaces, Report for Daventry District, February 2017'* recommends that development within the NRDA should use the Northampton open space standards.

The table below compares the open space standards in Section B of Policy CW2 with the latest Nortoft report for Northampton Borough Council (March 2018) titled *'Open Space, Playing Pitch and Sports Facilities Study (Part 4: Open Spaces)'*.

| Type | Daventry | Northampton |
|-------------------------------------------------|----------------|----------------|
| Parks and gardens | 1.46ha / 1000 | 1.43ha / 1000 |
| Amenity open space | 1.45ha / 1000 | 1.45ha / 1000 |
| Accessible natural and semi-natural green space | 1.57ha / 1000 | 1.57ha / 1000 |
| Children and young people's facilities | 0.3ha / 1000 | 0.25ha / 1000 |
| Allotments | 0.42ha / 1000 | 0.36ha / 1000 |
| TOTAL | 20.94ha | 20.38ha |

The table demonstrates that there are currently inconsistencies in the standards for the following types of open space which should be amended (subject to the results of the Viability Assessment) to reflect Northampton's latest standards:

- Parks and Gardens;
- Children and young people's facilities; and
- Allotments

(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.

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| 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. |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>As policies within the Local Plan (Part 2) will apply to the proposed Strategic Urban Extensions (SUEs) within the NRDA, the cost impacts of these policies should have been tested as part of the Council's Viability Assessment.</p> <p>Subject to the results of the Viability Assessment for the NRDA sites, the open space standards within the policy should also be amended to reflect the latest open space standards for Northampton.</p> |

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 | | Date | 04/10/18 |
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