

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		R
Last name		Hammond
Job title (where relevant)		
Organisation (where relevant)	Canton Ltd	Woods Hardwick Planning Ltd
Address line 1	c/o agent	Fort Dunlop
Line 2		Fort Parkway
Line 3		
City/Town		Birmingham
County		
Postcode		B24 9FE
Telephone number		07741 144986
Email (if provided we will always contact you this way)		r.hammond@woodshardwick.com

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: Introduction Chapter 3: Vision and Objectives Chapter 5: Development in the Rural Area	1.4, 3.1.02, 5.1.02, 5.105	RA2	

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	<input checked="" type="checkbox"/>	No	
4. (2) Compliant with the Duty to co-operate?	Yes	<input type="checkbox"/>	No	?
4. (3) Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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.

It is anticipated that Daventry District along with South Northants and Northampton Borough Council will undergo local government reorganisation within the next 3 years, with the expectation that the three councils will merge into a unitary authority. There is no acknowledgement or reference to this in the Regulation 19 plan, when the reorganisation will likely take place very early on in the life of the Part 2 Plan. There is consequently no commentary on the implications for plan making and review, including the potential for review of the Part 2 Plan earlier than would otherwise be the case. The absence of reference to the expected reorganisation does not appear to be in the spirit of the duty to co-operate.

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 does not place enough emphasis on the Government's objective of boosting significantly the supply of housing.

The housing targets set out in the submission plan, including for the rural area, are based on the West Northamptonshire Joint Core Strategy (JCS). This plan is nearing the end of the NPPF 5-year review period with the expectation that a review will not be completed within 5 years from adoption.

The Government acknowledges that the standard methodology for calculating housing need will likely have to be revisited to increase housing need following the reduced projections in the latest ONS 2016 household projections data; this has the potential to increase housing need including in the rural area.

The absence of a completed review of the JCS within the required five-year time period, coupled with the uncertainty around the standard methodology for calculating housing need, potentially casts doubt over housing delivery within Daventry District's rural area.

Policy RA2 is effectively a policy of restraint for new development in the villages within the District. The strong potential for an aging and stagnating population in the rural areas, compounded by an effective policy of restraint in the villages, and potential impact on demand for services, including school places, conflicts with para 83 of the NPPF which seeks the retention and development of accessible local services and undermines the social objective of para 8 of the NPPF.

Moreover, the policy of restraint is at odds with para 78 in not identifying opportunities for villages to grow and thrive.

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.

Consider establishing specific housing targets/land allocations for a sustainable level of limited growth in appropriate villages, such as Creaton, to allow growth and to enhance the vitality of rural communities including through support for and retention of local services and facilities.

Woods Hardwick Planning Ltd acts on behalf a local landowner in Creaton whose land has already been brought to the attention of Council through previous "call for sites" exercises. A copy of the previously submitted "call for sites" form and site plan identifying the land is attached to this form. The whole or part of the land remains available and developable.

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.

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.	✓
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9. Signature		Date	5/10/2018
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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 5th October 2018.
Responses received after this time will not be accepted.



Call for Sites: Site submission form
Closing date for responses – 11th March 2016

Please read the accompanying Guidance Notes before completing this form.

Contact Details

Title

Name

**Organisation
(where relevant)**

Address

Postcode

Telephone

Email address

Agent Details

Title

Name

**Organisation
(where relevant)**

Address

Postcode

Telephone

Email address

Site Interest

1. What is your interest in the site?

<input type="checkbox"/> Owner (whole site)	<input type="checkbox"/> Developer contracted to buy the land
<input type="checkbox"/> Owner (part of site)	<input type="checkbox"/> Developer speculative
<input type="checkbox"/> Town or Parish Council	<input type="checkbox"/> Local Resident
<input type="checkbox"/> Amenity/community group	<input type="checkbox"/> Registered social landlord
<input type="checkbox"/> Other (please specify):	

2. Are there other owners/agents of this site?

Yes
 No

If yes, please provide details below:

If there are more than two other owners, please complete their details on a separate sheet and attach to this form.

Title	<input style="width: 100%;" type="text"/>
Name	<input style="width: 100%;" type="text"/>
Organisation (where relevant)	<input style="width: 100%;" type="text"/>
Address	<input style="width: 100%;" type="text"/>
Postcode	<input style="width: 100%;" type="text"/>
Telephone	<input style="width: 100%;" type="text"/>
Email address	<input style="width: 100%;" type="text"/>

Does this owner support your proposal for the site?

Yes
 No

Title	<input style="width: 100%;" type="text"/>
Name	<input style="width: 100%;" type="text"/>
Organisation (where relevant)	<input style="width: 100%;" type="text"/>

Address

Postcode

Telephone

Email address

Does this owner support your proposal for the site?

Yes

No

Site Information

3.

Site name

Site address

Grid reference (if known)

Site area in hectares
(gross)Developable site area in
hectares (net)Current land use (eg.
Agriculture, employment,
unused/vacant etc.)Type of site (eg. Green
field, previously
developed land)Relevant planning history
(if known – please include
relevant planning
application numbers)

I have included an Ordnance Survey plan outlining the extent of the site

3

4. Adjacent land use (eg. Housing, employment, retail, leisure etc.)

North:

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South:

--

East:

--

West:

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Proposed Use & Capacity

5. Please indicate the proposed preferred use for the site and provide further information as requested.

If the site is proposed for mixed use, please tick all that apply

Use	Yes	Basic information – eg. Area/number of units/proposed floorspace/number of pitches - If residential then please include a brief explanation of how density has been arrived at
Residential (market housing)		
Residential (self-build)		
Residential (affordable housing)		
Residential (starter homes)		

Office, research and development, light industrial (B1)		
General industrial (B2)/ Warehousing (B8)		
Gypsy and travellers pitch(es)		
Travelling showpeople		
Gypsy and traveller emergency stopping place		
Retail (please which use class)		
Community facilities eg. Community hall (please specify)		
Sports/leisure (please specify)		
Open space		
Energy generation eg. Wind turbine, solar farm		
Other (please specify)		

6. Is the site an expansion of an existing business?

Yes

No

If yes, please provide details of existing site and its development:

7. Are you promoting your site as a rural exception site?¹

Yes

No

8. Would you be agreeable to only part of your site being considered?

Yes

No

9. Have you liaised with the town/parish Council regarding your proposal?

Yes

No

¹ **Rural exception sites:** Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Suitability

10. Is the site within a flood zone?

The Environment Agency website includes a flood map that can be used to determine if your site is within a flood zone and if so, what level of flood zone this is. This can be found here:

<http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

Yes

No

Don't know

If yes, is this...?

Flood zone 1

Flood zone 2

Flood zone 3

	Yes	No	Don't know
11. Is the land classified as best and most versatile agricultural land?			
12. Are there any ecological features e.g. nature reserves, Sites of Special Scientific Interest (SSSIs), local wildlife sites in close proximity to the site?			
13. Are there any geological features of significance that could affect the development of the site?			
14. Are there any existing trees /hedgerow/woodlands on the site?			
15. Are there any landscape features that could affect the site?			
16. Are there any public rights of way that cross or adjoin the site?			
17. Is there any contaminated land that would affect the development of the site?			
18. Are there any uses which could affect the development of the site eg. Power lines, railway lines, major highways, heavy industry, sewage treatment works			
19. Are there any topographical features that could affect the development of the site?			
20. Are there any watercourses or water features in close proximity to the site?			
21. Are there any heritage assets within or adjacent to the site eg. Listed buildings, conservation areas, scheduled monuments?			

22. Please list any features listed above:

23. Please provide any relevant information of likely measures to address any of the above that you have answered 'YES' to and refer to question number:

Utilities and facilities

Please tell us which of the following are available to the site	Yes	No	Don't know
24. Mains water supply			
25. Mains sewerage			
26. Electrical supply			
27. Gas supply			
28. Landline telephone/broadband internet			

29. Is the site safely and directly accessible from an existing (adopted) highway?

Yes

No

If not, can a new access be provided?

Yes

No

If yes, please indicate this on a scaled plan and attach it to this form. Please tick to confirm such a plan is attached.

Plan attached

30. Does the landowner/developer have control over the access?

Yes

No

31. Is the site safely and realistically accessible by public transport?

Yes

No

If so, how?**If not, how will your proposal achieve this?**

--

32. Please indicate the distances of the following services and facilities from your site?

Use/facility	Indicative distance (metres)
Primary school	
Secondary school	
GP surgery	
General food store	
Post office	
Village hall/Community centre	
Public transport (please provide details of the frequency of the service)	
Public house/restaurant	
Small shops/takeaways	
Libraries/outreach centres	
Pre-school provision	
Play area	
Sports ground	
Allotments	
Residential use	
Local employment provision	
Other, please advise:	

33. Are you aware of any other constraints which may affect the suitability of the site?

Availability

34. Are there any ownership or title constraints which you are aware of?

Yes

No

If yes, please provide details below:

35. Are there any restrictive covenants on the land which might affect the deliverability of the site?

Yes

No

If yes, please provide details below:

36. Must any land in other ownership be acquired to develop the site?

Yes

No

If yes, please provide details below:

37. Is the site...?

Vacant

Occupied

Partly occupied

If the site is considered to be suitable for development, would all or part of the existing use remain in occupation?

(a) Yes

(b) Yes, part

(c) No

If (a) or (b) do any of these require relocation before the site could be developed?

Yes

No

If (c) what would be the timetable for the existing use to cease?

38. Is the site available for development now (in 0-5 years)?

Yes

No

If 'No', when will the site be available?

6-10 years

11-15 years

16+ years

Achievability

39. Has the site been marketed for sale for the use proposed in your answer to question 5?

Yes

No

Don't know

If yes, how long has the site been marketed for, and what level of interest has been received?

40. In your opinion, are there any market factors or financial implications that could restrict potential delivery on site within:

- | | | | | |
|----------------|--------------------------|-----|--------------------------|----|
| a) 0-5 years? | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| b) 6-10 years | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| c) 11-15 years | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| d) 16+ years | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |

Market factors include: economic viability of existing, proposed and/or alternative uses, level of potential market demand and projected rate of sales etc.

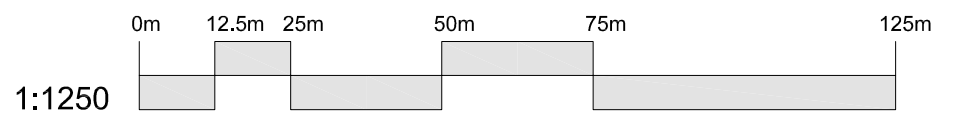
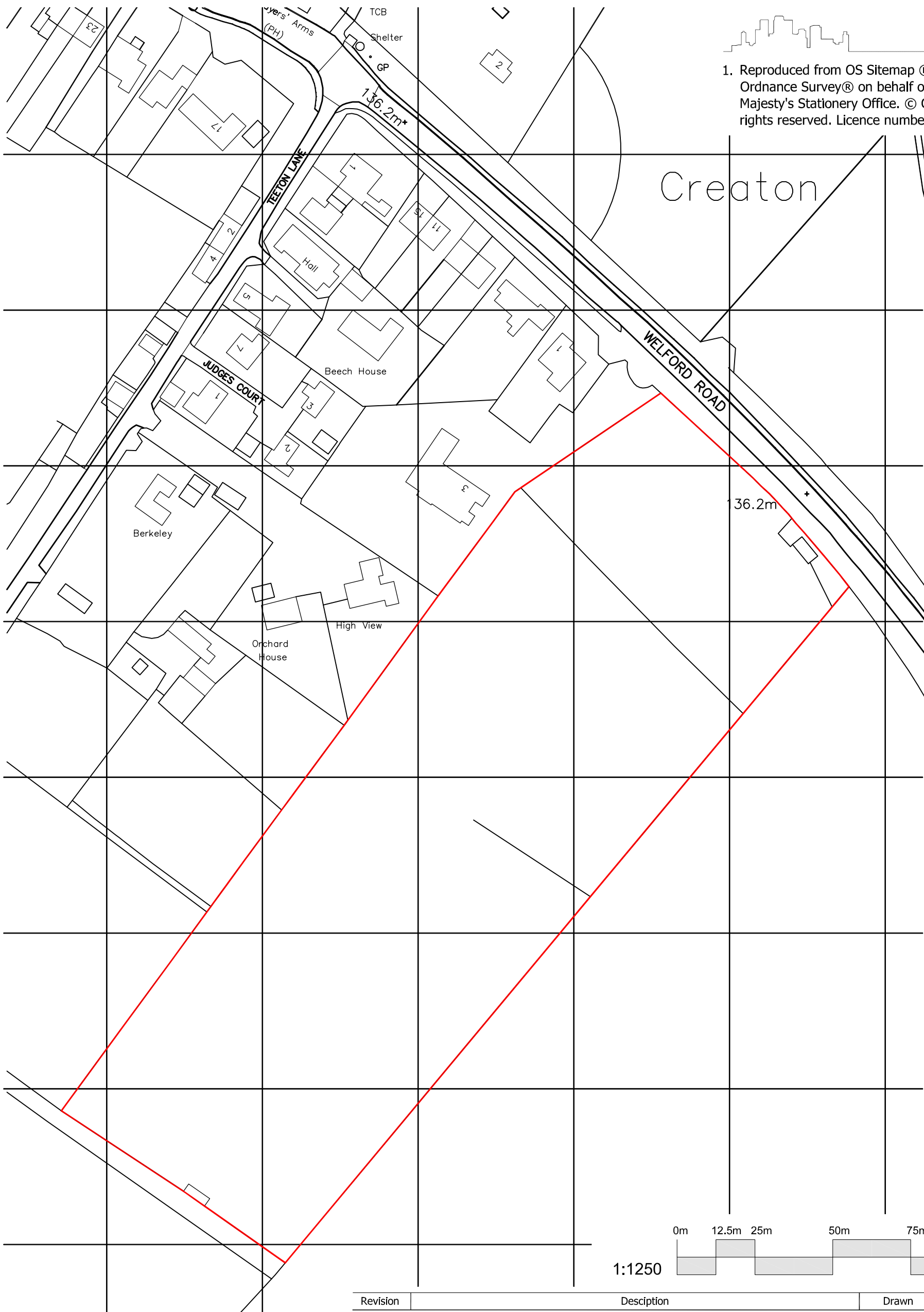
41. Please give details of market issues that have been considered and how any issues can be overcome.

42. If possible, based on current information please provide an estimate of the scale of development to be built on site per annum (April 1st to March 31st).

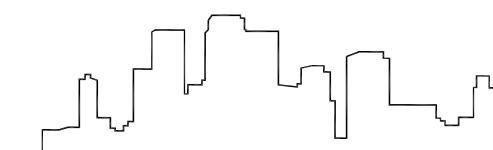
Year	Residential - estimated no. of units	Commercial - estimated floorspace m ²
2016/17		
2017/18		
2018/19		
2019/20		
2020/21		
2021/22		
2022-2027		
2028+		
TOTAL		
Once commenced how many years is it expected to fully develop the site?		
If known, how many developers would be involved in delivering the site?		
If housing, at what density would the site be built (dwellings per hectare)?		

43. Please supply any additional information that may help assessment of the site.

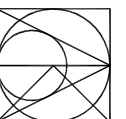
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Revision	Description	Drawn	Checked	Date
	Preliminary			
	Information			
	Tender			
	Construction			
	As Built			



Woods Hardwick
Architects, Engineers and Development Consultants



Title **Land off Welford Road, Creaton**

Details **Site Location Plan**

15-17 Goldington Road
Bedford
MK40 3NH
United Kingdom
T. +44 (0)1234 268862
F. +44 (0)1234 353034
mail@woodshardwick.com
www.woodshardwick.com

Scale **1:1250@A3** Date **June 2016** Drawn **DR** Chk **TJF**

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