

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		Miss
First name		Camilla
Last name		Duckworth
Job title (where relevant)		
Organisation (where relevant)	Moulton College	Turley
Address line 1		9 Colmore Row
Line 2		
Line 3		
City/Town		Birmingham
County		
Postcode		B3 2BJ
Telephone number		01212330902
Email (if provided we will always contact you this way)		Camilla.duckworth@turley.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
Moulton, Local Green Space, Housing Supply			

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

We would like to reiterate the statement made within our representation to the Draft Plan consultation in January 2018. The College has serious concerns with the absence of engagement with them in relation to the proposed 'Local Green Space' designation to the allotments on the outskirts of Moulton and the proposed 'Green Wedge' allocation adjoining Moulton to the north, prior to the draft Local Plan being formally published. As a landowner with significant land holdings within the parish boundary of Moulton, and with a vested long term interest in the proper stewardship of its Estate, it is critical that it is informed at the earliest stage of any potential changes, arising from third party interests. We therefore believe that the emerging Local Plan is not compliant, as it did not properly engage with landowners.

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.

Within our previous representations in respect of the allotment site on the outskirts of Moulton, it was confirmed that Moulton College had previously identified the allotment site as having potential for residential development, in association with further land to its immediate north. This position was made clear by the College in its response to the DDC's 'call for sites' submission in January 2016, where it was highlighted that the land could be regarded as a highly suitable and sustainable site for housing, being well related to the settlement boundary and within very close proximity to a range of amenities and services within Moulton.

In addition to this representation we would like to add as part of this representation that we support South Northamptonshire Council's (SNC) response to the Consultation Draft Settlements and Countryside Part 2 Local Plan, which appeals for Daventry District to support Northampton Borough Council in addressing the issue of housing supply within the Northampton Related Development Area (NRDA) through the inclusion of a criteria based policy that allows a limited amount of development adjoining the NRDA until such a time as the Part 1 Local Plan is reviewed, or it is possible to demonstrate a 5 year land supply. We disagree with the view taken by Daventry District Council (DDC), that the approach could 'undermine' the plan-led system. Furthermore, we agree with SNC that the criteria based policy approach to be 'realistic, pragmatic and plan-led approach to managing development on the boundary of the NRDA'

– supporting the provision of housing and housing need.

Since the Draft Plan consultation in January 2018, a revised NPPF has been adopted (July 2018). Within paragraph 214 of the revised NPPF, it states that policies within the 2102 NPPF will apply, for the purpose of examining plans, where those plans are submitted on or before 24th January 2019. Paragraph 17 'Core Planning Principles' within the 2012 NPPF states that plans should be 'based on joint working and co-operation to address larger than local issues'. The NRDA is a key strategic planning issue involving Daventry District Council, South Northamptonshire Council and Northampton Borough Council. However DCC's background paper in relation to its Duty to Cooperate requirements shows little cooperation between the authorities; with SNC criticising DCC's approach to the NRDA and housing supply, and the discussion with Northampton Borough Council (NBC) identified as being 'on-going' as regards the meeting the NRDA requirements. Furthermore, there is no apparent joint working on key issues to ensure the creation of a positively prepared and justified strategy for the Part 2 Local Plan.

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.

Positively Prepared

The first test to soundness is that a Plan is positively prepared. The NPPF advises that 'the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.' Whilst DDC states that its housing requirement has been met through proposed allocations, the need to meet the housing shortfall for NBC has not. Furthermore, the NPPF states that accommodating an unmet housing requirement from neighbouring authorities should form part of a planning strategy.

We therefore believe that the Plan has not been positively prepared, as it fails to help to provide for the housing needs of the adjoin Northampton Borough. We agree with SDC's statement that 'to be considered sound it is necessary for the plan to seek to address under-delivery in the NRDA - particularly given the limited opportunities to increase supply in the NRDA'.

Justified

We note that as part of the emerging Part 2 Local Plan the DDC has reviewed the Green Wedge boundaries, and in many cases has removed land that was designated Green Wedge in the 1997 Local Plan. However, despite this review part of Moulton College's land located on the northern boundary of Moulton remains as Green Wedge. The proposed Green Wedge does not provide a physical or visual separation of settlements, due there being no settlement directly to the north of Moulton. As a Green Wedge allocation here would not meet the criteria set out within Policy ENV3 within the emerging Local Plan, it is felt that there is no justification for it to remain as a Green Wedge allocation.

In relation to residential development, as indicated, there is a need for DDC to accommodate more of NBC's housing need. NBC's current housing land supply position is 2.64 years. The Daventry Local Plan Part 2 provides an opportunity to deliver additional housing to address this shortfall. As stated previously, Moulton is a sustainable settlement which is capable of accommodating additional housing. Whilst a wider approach to meeting NBC's housing needs is required. Where there are appropriate, sustainable, and readily available sites (such as Moulton College's adjoining land to the north of Moulton), in the short-term, these can help to meet the contribution to address NBC's housing shortfall.

Furthermore, the Local Green Space draft allocation for the allotments in Moulton is not justified, as stated with our previous representations, this site is already subject to policies which afford allotments protection from development. This is confirmed through reference to the Glossary (Appendix B) of the draft Local Plan which states that allotments are 'Green Infrastructure' and that under Policy ENV4, the

Council 'will protect, enhance and restore the District's green infrastructure assets'. Furthermore, Policy CW1 (ii) – 'Health and Wellbeing' confirms that the protection, management and enhancement of green infrastructure will be supported.

The Moulton Neighbourhood Development Plan also affords this site some protection from development, through its designation within the Pages Brook Valley 'Green Space' and associated Policy E1. In this context, we can see no justification for imposing a further layer of protection on this site.

Effective

The effectiveness of the Plan should confirm that the Plan is 'deliverable over its period and based on effective joint working on cross-boundary strategic priorities'. As set out above, there are concerns around the joint working cross-boundaries between local authorities to assess the issue of housing supply within the NRDA.

A key cross-boundary strategic priority identified in the emerging Plan within 'Policy SP1: Daventry District Spatial Strategy' is, *'to ensure a sustainable pattern of development to meet the overall spatial strategy of the West Northamptonshire Joint Core Strategy, sustainable development in Daventry District will be guided by the following spatial principles*

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."

The emerging Plan identifies four housing allocations for Daventry Town to support its growth to complement the strategic allocations of the JCS which provides a strategic allocation of 4,000 dwellings. Overall the Plan allocates a further 1,100 dwellings over and above the strategic allocation of 2,600 to be delivered within the Plan period to support the growth of Daventry. A number of smaller allocations to support the severe housing supply shortfall at Northampton, including land to the north of Moulton, would not be a strategic issue and could readily be accommodated in the emerging Part 2 Plan. The allocation of a number of additional small sites will not be of a scale to disrupt the delivery of allocated sites or jeopardise the strategy of the Plan.

Consistent with National Policy

The fourth test of soundness relates to the Plan enabling the delivery of sustainable development in accordance with the policies in the NPPF. Sustainable development, as defined within the 2012 NPPF, is identified by three dimension; economic, social and environmental, to perform a number of roles.

It is considered that economically, development of land to the north of Moulton would support and sustain the growth of Northampton to the south, as the main centre for employment, retail and leisure; in line with paragraphs 54 and 55 of the NPPF.

Socially, residential development to the north of Moulton would help to provide a range of residential units fit to meet the needs of the local area, and include the provision of additional affordable housing for Moulton.

Environmentally, the site is situated adjoining the settlement boundary of a sustainable settlement, Moulton, with sustainable transport modes into Northampton

In conclusion, we consider that Moulton College's land to the north of Moulton presents a sustainable, appropriate, and readily available site to help support the unmet housing need in NBC.

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.

It is felt that the Plan should be amended to remove the proposed and unnecessary Green Wedge and Local Green Space allocations to the north of Moulton; and for these areas to be identified for housing to help meet the NBC housing shortfall, within a sustainable settlement.

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 enable further expansion on the points made above.

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	Camilla Duckworth	Date	5 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.**