



Daventry District Council

Planning Policy

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DAVENTRY

NN11 4FP

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# Daventry Design Codes

Adopted as a Supplementary Planning  
Document

December 2005

Accompanying Sustainability Appraisal

Approved December 2005

REPORT ON CONSULTATIONS AND PUBLICITY

RESPONSES TO REPRESENTATIONS

CHANGES TO DRAFTS

## **Daventry Design Codes**

### Introduction

The Design Codes provide guidance for future development within Daventry, including design principles that can be applied to future urban extensions.

At its meeting on 21 July 2005 the Council's Strategy Group approved the draft Design Guide for the purposes of consultation. It was accompanied by a Sustainability Appraisal (Consultation Draft).

### Consultation

During the week commencing Friday 12 August over 700 letters and emails were sent to organisations, town and parish councils and individuals who were listed on the Council's database. In addition, a workshop was held with local stakeholders (representatives from the Town Council, local businesses and organisations) during the preparation of the document.

### Publicity

The draft Design Code was posted on the planning consultation section of the Council's website.

The Council placed advertisements in the Daventry Express, The Northampton Chronicle and Echo and the London Gazette. A copy of the advertisement is included at Appendix A. A press release was also prepared (Appendix B), which appeared in the Daventry Express and the Chronicle and Echo on 12<sup>th</sup> September 2005. Councillor Wendy Amos was also interviewed about this document on BBC Radio Northampton 17<sup>th</sup> August.

### Consultation Period

The consultation period ended at 4.30pm on Friday 23<sup>rd</sup> September 2005.

### Comments received.

12 organisations and individuals responded to the Design Code consultation. Appendix C contains a summary of all the representations. 3 comments were received to the Sustainability Appraisal consultation. Appendix D contains a summary of all the representations. Copies of the full representations can be viewed at the Council's offices by prior appointment.

### Consideration of Responses

The representations were reported to the Council's Strategy Group at its meeting on 24 November 2005 and Full Council on 8 December 2005. The Council agreed a response to each of the comments and agreed, where appropriate, changes to the document in response to the comments.

# **Advertisement**

## **DAVENTRY DISTRICT COUNCIL**

### **PLANNING AND COMPULSORY PURCHASE ACT (2004)**

### **DAVENTRY DESIGN CODES (CONSULTATION DRAFT) AND SUSTAINABILITY APPRAISAL (CONSULTATION DRAFT)**

and

### **DAVENTRY INTERNATIONAL RAIL FREIGHT TERMINAL EXPANSION DESIGN GUIDE (CONSULTATION DRAFT) AND SUSTAINABILITY APPRAISAL (CONSULTATION DRAFT)**

The District Council's Strategy Group has resolved to invite comments on these documents. Once adopted they will supplement the policies and proposals of the Local Plan and emerging Local Development Framework.

Both documents set out draft design principles of how the Council expects to see Daventry town centre and urban extensions, and the Terminal Expansion area developed respectively. These are accompanied by their draft sustainability appraisals.

The Council welcomes comments from any interested party on these documents. The documents are available for inspection at Planning Reception, Daventry District Council, Lodge Road, Daventry; the libraries at Daventry, Moulton, Kingsthorpe, Long Buckby, Woodford Halse and Brixworth; and the Council's Outreach Centres at Woodford Halse and Brixworth during normal opening hours.

A copy is available on the Council's website ([www.daventrydc.gov.uk/planningconsultation](http://www.daventrydc.gov.uk/planningconsultation))

Comments in writing should be forwarded to Karen Britton, Senior Planning Officer, Daventry District Council, Lodge Road, Daventry, Northamptonshire, NN11 4FP or e-mail [kbritton@daventrydc.gov.uk](mailto:kbritton@daventrydc.gov.uk) by 4.30pm on Friday 23<sup>rd</sup> September 2005 at the latest. Comments cannot be accepted after this time.

Ossie Williams  
Corporate Manager



# **NEWS AND INFORMATION**

## **MARKETING AND COMMUNICATIONS**

Lodge Road, Daventry, Northants, NN11 4FP  
Telephone 01327 302404 Fax 01327 876543  
Website: [www.daventrydc.gov.uk](http://www.daventrydc.gov.uk)  
Email: [news@daventrydc.gov.uk](mailto:news@daventrydc.gov.uk)

**PR 253**

**16 August 2005**

**For Immediate Release**

### **Designs on the Future – Your Views Sought**

Daventry District Council is seeking district resident views on two design documents relating to Daventry town centre and the expansion of Daventry International Rail Freight Terminal (DIRFT).

Residents have until 4.30pm on Friday, 23 September 2005, to lodge their opinions on both of these consultation documents.

The Daventry Design Codes are a set of design rules and requirements that affect future development; they are a new planning technique. Daventry District Council will be one of the first planning authorities to adopt design codes.

Specialist urban design consultant Halcrow Group, has prepared the design code document for Daventry, which includes a strategic level design code for the town and design principles that could be applied to potential urban extensions to the town. The code aims to improve the future design quality of developments and ensure that local character is respected. This comprehensive document covers everything from general sustainable design techniques, such as the use of building material and water efficiency through to guidance on public art. It also provides design principles for particular geographic areas of the town centre.

With respect to the DIRFT Design Guide, Daventry District Council is consulting on a Design Guide for the DIRFT expansion area (54 hectares to the west of the existing DIRFT facility).

More...

**Designs on the Future – Your Views Sought.../2**

The guide highlights the general design considerations that any development proposals will need to consider, for example local landscape character, sustainable transport and access. It also contains more specific site design guidance, such as including the type of lighting to be used and ways of developing the area more sustainably by incorporating water and energy efficient designs. In particular, it recommends a requirement for commercial/industrial buildings of over 1,000 sq m to guarantee that 10 per cent of their on-site energy use comes from renewable sources.

Both the draft DIRFT Design Guide and the draft Daventry Design Codes are accompanied by draft Sustainability Appraisals. These consultation documents are available for inspection at Daventry District Council's planning reception (Lodge Road, Daventry), at the libraries at Daventry, Moulton, Kingsthorpe, Long Buckby, Woodford Halse and Brixworth and also at the council's information centres in Woodford Halse and Brixworth during normal opening hours.

They are also available on the council's web site [www.daventrydc.gov.uk/planningconsultation](http://www.daventrydc.gov.uk/planningconsultation) . Written comments on the documents should be addressed to the Senior Planning Officer, Planning Policy, Daventry District Council, Lodge Road, Daventry, Northamptonshire NN11 4FP or email them to [planningpolicy@daventrydc.gov.uk](mailto:planningpolicy@daventrydc.gov.uk) .

-Ends-

**For further information please contact:**

For further information please contact:

Josie Goodwin, Daventry District Council on 01327 302404 or [jgoodwin@daventrydc.gov.uk](mailto:jgoodwin@daventrydc.gov.uk)

***Daventry Design Codes***

***Responses To Consultation Draft***

The table sets out a summary of all responses received within the consultation deadline. Those replying with “no comment” have been listed first in the table, with the remainder having been placed within the table in no particular order. The full list of respondees is given below. At the end, a section has been included which sets out additional key changes proposed by the Senior Planning Officer, Daventry District Council.

**Respondees List**

1. William Davis Ltd
2. Turley Associates for Danetree Village Consortium
3. Croudace Homes Ltd
4. The Countryside Agency (Landscape, Access and Recreation Division)
5. The Environment Agency
6. Northamptonshire County Council (Spatial Planning)
7. The Department of Health
8. CABE – The Commission for Architecture and the Built Environment
9. The Theatres Trust
10. Daventry Town Council
11. Northamptonshire Probation Service
12. East Midlands Development Agency

**Abbreviations**

- DC = Daventry Design Code  
DDC = Daventry District Council  
LPA = Local Planning Authority  
PPS = Planning Policy Statement  
MKSMSRS = Milton Keynes and South Midlands Sub-Regional Strategy

| <b>Respondee</b>   | <b>Summary of Comment</b>   | <b>Response</b>  | <b>Change to Design Guide</b> |
|--|---|--|-------------------------------|
| The Department of Health   | Contents Noted  | None   | None                          |
| CABE – The Commission for Architecture and the Built Environment | No comment  | None   | None                          |
| The Theatres Trust   | No Comment  | None   | None                          |
| Northamptonshire Probation Service                               | No Comment  | None   | None                          |
| East Midlands Development Agency                                 | No Comment  | None   | None                          |
| William Davis Ltd  | Para. 3.4.9 Government guidance in “By Design” stresses the need to encourage a move away from standards “such as setting minimum distances between buildings” (page 10 of “Urban Design in the Planning System: Towards Better Practice”) towards a more positive emphasis on performance criteria. “By Design: Better Places to Live” also notes well established rules of thumb such as back to back distances “should be applied flexibly in relation to the specific context and in recognition that the objective of privacy can often be secured through careful design rather than by physical separation alone” (page 53). DG provides | DC highlights exceptions to enable flexibility, for example to provide good townscape or create surveillance .... etc. | None                          |

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|  | <p>flexibility between frontages but para 3.4.9 prescribes 22 metres as the standard “normally” to be achieved to the rear of buildings with limited exception. This does not accord with “By Design”.</p> <p>Para. 3.7.1 Two bullet points refer to grey wastewater for toilet flushing. We are advised that such systems are not sufficiently robust for widespread installation. Most require chemical treatment and experience has shown households cannot be relied upon to maintain systems, leading to health risks and complaints relating to poor water quality. Both bullet points should therefore be deleted.</p> <p>Para 8.4.2 refers to allotments being sited throughout development, yet there is no requirement for such provision within extant Development Plan. In absence of a policy, District Council should provide other evidence for provision either up-to-date PPG17 Assessment of Needs or Recreation Strategy.</p> | <p>The paragraph highlights the variety of ways in which water could be conserved. It says that “all should be considered” not that any specific one is “mandatory”.</p> <p>Interim SPD Infrastructure Adopted 30<sup>th</sup> September 2004 sets out guidance on allotments. Provision of allotments will be determined based on evidence at the time of a planning application. The DC to be amended to clarify this and that assessment will be required to determine allotment provision. The term “throughout” may be misleading, however the principle aim is to ensure allotments are accessible. This will be clarified.</p> | <p>None</p> <p>Amend DG</p> |
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|                           | <p>Para. 8.9.8 Fig 61 shows diagram of a 400m catchment for public transport, para. 8.9.8 refers to all new housing being located within 300m (400m if unavoidable) of a bus stop. No 300m standard exists within extant Development Plan or PPG13 or its accompanying best practice guidance and 400m is more widely accepted as relevant standard. Para. should therefore only refer to 400m distance.</p>   | <p>This point has been checked with NCC - Public Transport. Confirm that no current policy exists to support the 300m distance, therefore on this basis the current standard of 400m should be included. DC to therefore be amended.</p>   | <p>Amend DG</p>                 |
| <p>Croudace Homes Ltd</p> | <p>Any adopted design documents must be flexible and not become blueprints that inhibit progress. Flexibility particularly important for new urban extensions. May be beneficial to define a Design Framework i.e guidance, statement, code which anticipates changing circumstances and ensures uninterrupted implementation.</p> <p>Document needs to be revised to provide clarity on what is appropriate form and character of development. Majority of residential areas in Daventry are typically low to medium density. Recognition needs to be given to contemporary design criteria</p> | <p>The DC provides a broad overview for any new urban extensions. It is recognised that as we are at the early stage of defining urban extensions, we can only provide general design guidance at this stage. More detailed Design Framework will be required once specific site areas and land use mixes are known. DC to be amended to highlight how it fits into the current stage of the Urban Extension work.</p> <p>Para. 6.10 refers to density details being provided in the Character Area Analysis. Para. 6.15.1 needs to identify/cross-reference more clearly the intention that while local</p> | <p>Amend DC</p> <p>Amend DC</p> |

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|  | <p>- PPG3 etc, which will be applied to future development. Current text appears to present conflicting information, especially re- need for innovation and responding to historic character and materials.</p> <p>Para 8.8.2 Daventry and hinterland has a strong landscape setting characterised by sloping ground and ridges. Clearer definition of “hillsides” is needed.</p> <p>Para 8.9.9 Further advice on type, nature and associated requirements of advanced transport systems is necessary before safeguards can be meaningfully incorporated.</p> | <p>vernacular is important to retain/promote, this might be achieved by e.g picking out key local vernacular features and designing them using innovative materials etc.</p> <p>Amend DC by deleting first sentence in para. 8.8.2</p> <p>The planning stage for the urban extensions is at its earliest phase hence we highlight that space may be required for an advanced transport system – this idea will evolve during the planning for these areas, but at this stage needs to be born in mind and hence highlighted in the DC.</p> | <p>Amend DC</p> <p>None</p> |
| <p>Turley Associates for Danetree Village Consortium</p> | <p>In general terms, approach and content is welcomed – broad philosophical approach to structuring urban extensions is endorsed.</p> <p>However, concern that fails to interpret generic national policy and guidance for Daventry specifically enough to supplement UDP policies. Lack of prescription and co-ordination with other associated policy documents that might lead to misinterpretation. This is not a Design</p>  | <p>Point welcomed.</p> <p>The Design Code is more specific at the town centre level as the built environment already exists/policies exist for it. However, as sites/ land uses have yet to be determined for urban extensions, guidance</p>   | <p>None</p> <p>Amend DC</p> |

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|  | <p>Code in the normal meaning of the term. The urban form principles of new urban extensions are seen to be generally sensible, appropriate and implementable – however it is considered requirement to safeguard routes and linkages for an advanced transport system is :</p> <ul style="list-style-type: none"> <li>a) unreasonable in absence of an idea of what is meant;</li> <li>b) produce townscape alien to that which would naturally emerge under other guiding principles;</li> <li>c) not provide or create the most accessible and viable alternative to public transport.</li> </ul> <p>Some of the illustrations are crude and unhelpful and demonstrate urban forms which are alien to basic principles of the SPD.</p> <p>Use of term “Design Code” might be misleading. Design Code as defined by current best practice is a prescriptive framework through which detailed design process is guided and managed. This document appears to set out a more</p> | <p>can only be general at this stage. The Design Code for the town centre is therefore more specific, whilst it is confirmed that this is less developed for the urban extensions by the nature of the stage of their development. The document will be re-visited to check that all relevant policy documents are cross-referenced. As reiterated, the planning stage for the urban extensions is at its earliest phase hence we highlight that space may be required for an advanced transport system – this idea will evolve during the planning for these areas, but at this stage needs to be born in mind and hence highlighted in the DC.</p> <p>DC to be amended to highlight more appropriate illustrations in places.</p> <p>Design Codes carried out elsewhere to date have focussed on areas where specific planning proposals are already known e.g where large sites have planning permission.</p> | <p>Amend DC</p> <p>Amend DC</p> |
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|  | <p>strategic approach to general principles of urban design and townscape. The document sets a wider context within which individual schemes and masterplans can emerge. The design codes themselves will naturally emerge from this wider context at the next stage of the process – as component elements of any applications/proposals – may be more appropriate to describe the SPD as Daventry: guidance on urban design principles.</p> <p>Document could benefit from:</p> <ul style="list-style-type: none"> <li>Redefinition of locus and purpose of guidance;</li> <li>Consideration of alternative title;</li> <li>Restructuring for clarity and focus;</li> <li>Provision of illustrations fit for purpose;</li> <li>Commitment to greater and better illustrated detail – particularly in defining local exemplars for urban extensions;</li> <li>Commitment to more balanced environmental and accessibility emphasis;</li> <li>Key revisions in relation to Urban Form Principles and associated text.</li> </ul> <p>Para. 3.3.1 Concentration of development in a broadly linear form is better for enhancing and sustaining public transport than a more dispersed transport pattern. This preferred form might be developed as a principle of urban form. Also applies to</p> | <p>The intention of the DC for Daventry is to provide as much guidance as possible at the earliest stages of any development given that extensive changes are anticipated to the town and immediate surroundings. Detailed guidance is therefore included for the town centre i.e where existing development constraints/character can be readily determined. Obviously, as extension areas are not yet known, specific guidance cannot be given at this stage, hence more general design objectives are highlighted. It is anticipated that this will assist in guiding initial design decisions, which will also need to refer to more detailed guidance in due course i.e once sites are known further guidance e.g masterplans etc will be necessary. DC to be amended to explain this.</p> <p>Care needs to be taken in wording this, as public transport routes do need to be fairly simple i.e broadly linear yet we do not want to create linear ribbon-like development</p> | <p>Amend DC</p> |
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|  | <p>para.8.2.1/12, 8.9.1, 8.9.2, 8.9.7 and 8.12.1.</p> <p>Para. 3.3.2 Clear strategy is required to overcome barriers to movement particularly that created by intrusive ring road system. Pedestrians and cyclists to be given choice of routes that do not funnel people through underpasses – comfortable, accessible and functional surface level crossings. SPD needs to provide clear guidance on interventions required to overcome barriers. Provide general guidance on public realm issues – clutter reduction, multiple functionality, limited yet high quality palettes of materials, whole life costing.</p> <p>Para 3.5 SUDS is now SDS Sustainable Drainage Systems.</p> <p>Para. 3.7.3 Guidance required re-minimization of upward light spillage and avoid sodium orange halo effects.</p> <p>Para. 8.2.1/11 Concept of “advanced transit system” is ill-defined – the principle is unacceptably ambiguous – not possible to safeguard for unknown quantity. Principle should be deleted. If means separate corridor or alignment for public transport</p> | <p>associated with such routes. The DC should be amended to provide further guidance on this.</p> <p>DC to be amended to highlight this issue. Street clutter is mentioned under para. 4.6.2</p> <p>Advice from Environment Agency is that SUDS should now read SuDS. DC to be amended.</p> <p>DC to be amended to refer to lighting requirements.</p> <p>The planning stage for the urban extensions is at its earliest phase hence we highlight that space may be required for an advanced transport system – this idea will</p> | <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> <p>None</p> |
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|  | <p>extreme concern that this would produce townscape entirely alien to other SPD principles – most appropriate, sustainable and viable public transport system in accessibility and urban design terms is the street.</p> <p>Para. 8.2.1/12 Principle overlaps with 8.2.1/4. Redefine as expressing importance of generating a sustainable profile/gradient of densities where concentration of development on a broadly linear form is most appropriate way of sustaining public transport as well as structuring form of urban extension.</p> <p>Para. 8.4.2 Image used to illustrate this is unacceptably crude and promotes entirely wrong interface between built and open components of urban form.</p> <p>Para. 8.8.2 and 8.13 Density ranges might be identified for other conditions within urban extensions.</p> <p>Para. 8.9.1 Unrealistic to expect public transport will run regular services throughout night – should be deleted.</p> <p>Para. 8.9.8 Requirement that “all new housing should be located within 300m... of bus stop” is too prescriptive and should be amended. May conflict with Fig. 6.1. Encouraging public transport usage is about quality and frequency than arbitrary</p> | <p>evolve during the planning for these areas, but at this stage needs to be born in mind and hence highlighted in the DC.</p> <p>As above, care needs to be taken re- wording this as we do not want to create linear ribbon-like development associated with such routes. The DC should be amended to provide further guidance on this.</p> <p>DC to use better illustration.</p> <p>This issue to be considered and incorporated, as appropriate.</p> <p>Point noted – DC to be amended.</p> <p>This point has been checked with NCC - Public Transport. Confirm that no current policy exists to support the 300m distance, therefore on this basis the current standard of</p> | <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> |
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|  | <p>limit on walk to bus stops. IHT Guidelines for Planning for Public Transport in Developments refers to 400 metres it states – “it is better to provide bus routes that are simple and direct than slavishly follow limits on walk distances to stops...”</p> <p>DC noticeably lacks any real coding e.g no guidance on highway hierarchies, forms and widths. Focus of the document needs to be reviewed along with title. Benchmark adopted design codes including Upton and Ashford. As a strategic urban design document its role is better focused on promoting high standards of local distinctiveness, quality, thinking and innovation. Provide context for emergence of detailed design codes as an integral part of planning applications coming forward for urban extensions.</p> | <p>400m should be included. DC to therefore be amended.</p> <p>Design Codes carried out elsewhere to date have focussed on areas where specific planning proposals are already known e.g where large sites have planning permission. The intention of the DC for Daventry is to provide as much guidance as possible at the earliest stages of any development given that extensive changes are anticipated to the town and immediate surroundings. Detailed guidance is therefore included for the town centre i.e where existing development constraints/character can be readily determined. Obviously, as extension areas are not yet known, specific guidance cannot be given at this stage, hence more general design objectives are highlighted. It is anticipated that this will assist in guiding initial design decisions, which will also need</p> | <p>Amend DC</p> |
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|  |   | to refer to more detailed guidance in due course i.e once sites are known further guidance e.g masterplans etc will be necessary. DC to be amended to explain this. DC to also consider further guidance on highway designs. |      |
| Daventry Town Council  | In general Consultation Draft reflects major concerns identified by Town Council's Town Design Statement Working Group – particularly anxious to ensure local historic and conservation character of town is expressed not only in regeneration of town centre but in proposed urban extensions.  | Para. 8.2.1 and 8.2.2 e.g highlight the need to respect local/historic character.  | None |
| The Countryside Agency (Landscape, Access and Recreation Division) | In general LAR is very supportive of the design guide, particularly the emphasis it makes to creating a sense of place and local distinctiveness.<br><br>We have the following detailed comments to make: <ul style="list-style-type: none"> <li>• We support the encouragement of walking and cycling as set out in chapter 3 "Sustainable Design Techniques"</li> <li>• At para. 3.6 LAR supports the point that green corridors should be retained or created. These corridors can contribute to the green infrastructure of the area as a whole.</li> </ul> | Welcome comments   | None |

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|  | <ul style="list-style-type: none"> <li>• At para. 4.1 LAR welcomes the inclusion of the definition of Daventry's Local Landscape Character.</li> <li>• LAR supports para. 6.17 which advises that landscape constraints and opportunities should be fully assessed and landscape elements such as trees open spaces and watercourses should be made key features of design proposals.</li> <li>• We support para. 6.16.2 which acknowledges that public open spaces should be multi-functional providing a wide range of activities and be accessible to a wide range of people.</li> <li>• LAR would have liked to see reference to Village/Town Design Statements.</li> </ul> <p>There are two publications that LAR would like to draw your attention to, these are, <i>'The Countryside in and Around Towns'</i>, a joint vision between the Agency and</p> | <p>Whilst the DC relates to Daventry town, it is acknowledge that nearby Village Design Statements could provide valuable additional guidance in relation to expansion areas that may expand from the town into adjoining parishes. Amend DC to refer to VDS of both the town and villages.</p> <p>DC to be amended to highlight all relevant documents either those approved as policy or those of a guidance nature.</p> | <p>Amend DC</p> <p>Amend DC</p> |
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|                        | <p>Groundwork which provides a vision for connecting town and country, and <i>'Planning Sustainable Communities'</i>. The later document is a green infrastructure guide, developed on behalf of the Milton Keynes and South Midlands Environment &amp; Quality of Life Sub Group, specifically for Milton Keynes and the South Midlands but would be of relevance to the East Midlands region as a whole. All the above publications are available through the Countryside Agency's web site at <a href="http://www.countryside.gov.uk">www.countryside.gov.uk</a>.</p>   |   |   |
| The Environment Agency | <p>Welcome the preparation of this DC to help ensure that future development in Daventry is sustainable and of high quality. This is particularly important given the significant scale of growth anticipated.</p> <p>Note that Chapter 8 is intended to supplement the overarching principles of the preceding chapters (especially Chapters 2 and 3), which should <i>also</i> be considered as urban design principles for new urban extensions. This is acknowledged in Para. 8.1.1.</p> <p>Recognise that 'adaptability' is strongly related to sustainability, we would suggest that sustainability (particularly in terms of environmental sustainability) has an increased emphasis in Chapter 2. As PPS1 states, sustainable development is the core principle underpinning planning, and it is</p> | <p>Comment welcomed</p> <p>DC to be amended to clarify that principles in other sections also relate to the urban extensions.</p> <p>DC to be amended to provide more emphasis where appropriate.</p> | <p>None</p> <p>Amend DC</p> <p>Amend DC</p> |

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|  | <p>important that this is reflected in the SPD.</p> <p>Consider that the heading for Para. 3.5 should be amended to reflect the fact that the section deals also with flood risk issues. In addition, the beneficial effects of sustainable drainage systems on water quality should also be highlighted.</p> <p>We welcome the coverage given to SuDS (sustainable drainage systems) within the draft SPD. Please note that the term <i>SuDS (sustainable drainage systems)</i> should be used instead of <i>SUDS (Sustainable Urban Drainage Systems)</i>.</p> <p>Add the following to Para. 3.5:<br/>Porous paving can be applied to all or part of a site. Furthermore, a combination of SuDS measures often results in the most effective and cost-efficient drainage solution. SuDS schemes should also be considered in terms of their biodiversity and water quality treatment potential. Features such as balancing ponds can often be integrated into public open space.</p> <p>The SPD should refer potential applicants and developers to the Environment Agency's indicative flood risk maps (available on our web site at <a href="http://www.environment-agency.gov.uk">www.environment-agency.gov.uk</a>).</p> <p>If the development site is (a) located within an area identified to be at risk of flooding and/or (b) over 1 hectare in size</p> | <p>Amend DC to provide new subtitle and incorporate this reference to water quality.</p> <p>Amend DC to highlight new phrase.</p> <p>Amend DC to include these suggestions re- SuDS.</p> <p>Amend DC to refer to this.</p> <p>Amend DC to highlight this.</p> | <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> |
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|  | <p>(regardless of its location as large developments may have significant runoff implications downstream) it is likely that a flood risk assessment (FRA) will be required to accompany the planning application. The SPD should advise prospective applicants of this requirement, and recommend that they contact the Environment Agency prior to submitting such applications, with a view to obtaining pre-application advice and a 'letter of compliance' for the flood risk assessment. The SPD should also make prospective applicants aware of the flood risk standing advice issued by the Environment Agency to Daventry District Council, available at <a href="http://www.pipernetworking.com/floodrisk">www.pipernetworking.com/floodrisk</a>.</p> <p>We welcome the encouragement of water conservation measures in para. 3.7. We request that an additional objective 'to ensure adequate water supply and efficient use, whilst maintaining and improving the quality of ground and surface waters' be added to the sustainability appraisal framework. This would help ensure that this aspect of sustainability is fully addressed by the SPD. Criteria which could be used to assess performance against this objective could include:</p> <ul style="list-style-type: none"> <li>• Will new development be supplied with water using existing sources under existing licence</li> </ul> | <p>Amend DC to highlight this.</p> | <p>Amend DC</p> |
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| <p>Northamptonshire County Council (Spatial Planning)</p> | <p>Generally felt document is “fit for purpose” as a SPD and provides robust set of design principles for development in Daventry. Planning framework and context is easily understood by the reader. Would be helpful, particularly in Section 8 to refer to level of growth in MKSMSRS. Gives reader a clearer context of level of growth and wider impact and role of DC.</p> <p>Para. 3.2.1 Should refer to adopted County Structure Plan figure of over 35 dwellings/ha and locations of where higher density may be appropriate.</p> <p>Para. 3.3 Schools and other educational facilities should be easily accessible by walking and cycling – take into account Safer Routes to School guidelines.</p> <p>Para. 3.11 makes reference to recycling – welcomed. This and Section 8 could be strengthened by making clearer reference to developers locating waste management facilities in areas of new development. Reference should be made to neighbourhood facilities for separation, storage and waste collection to increase efficiency of reuse, recycling and treatment, more wide and robust than in para. 3.11. This would bring the document more in line with Government policy and best practice.</p> | <p>Points welcomed. Amend DC to refer to MKSMSRS growth level.</p> <p>Current density policy will be held in other planning policy documents. DC to cross-reference to relevant policy documents.</p> <p>DC to be amended to highlight this.</p> <p>DC to be amended to highlight this.</p> | <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> |
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| <p>Senior Planning Officer, Daventry District Council</p> | <p>DC to highlight the use of the new Landscape Character Assessment work as a baseline data resource for assessing local landscape character. This is particularly relevant to Para. 4.1. Also historic character assessment and biodiversity character assessment – para. 4.2. Other areas where this could be used are para. 2.5 where character analysis could help consider site’s context in neighbourhood, town or village. Para. 4.2.2 looking at interrelationship between open countryside and settlement; para. 8.2 in determining urban extensions, para. 8.3.1 integration into landscape. Also, recommend LCA approach for Section 8.</p> <p>Para. 3.6 wish to see Green Infrastructure highlighted in the DC. In addition, this section does not mention the historic built environment of Daventry (although archaeology and geology features are mentioned in para. 3.6.3) – The DC needs to highlight that new development should seek to minimise damage to the local historic built environment.</p> <p>Para. 4.2 outlines development over 100 years – why only this period - what about earlier maps were these considered?</p> <p>Para. 8.1.1 Include biodiversity.</p> | <p>DC to be amended to highlight this.</p> <p>DC highlights different aspects of green infrastructure e.g trees, hedgerows etc, however does not refer to this phrase specifically - DC to be amended to highlight this. DC to also be amended to highlight local historic built environment.</p> <p>DC to be amended to refer to research pre-100 years.</p> <p>This could be covered by the broad reference to local character.</p> | <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> <p>None</p> |
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|  | <p>Para. 8.3.1 Include grasslands.</p> <p>Para. 8.3.4 Where an area does not meet designation criteria, should be considered in local context and potential value taken into account – refer to BAP.</p> <p>DC needs to ensure that the sections of general design principles and the specific character analysis/design principles are clearly distinguishable for ease of use of the document.</p> <p>Generally length of the document is off-putting/difficult to quickly locate information. By deleting the very “basic”, general phrases, the document could be shortened and more manageable.</p> <p>DC document needs checking throughout to ensure that focus is not just on residential design e.g para. 3.7.3 relates to just lighting of dwellings. All types of lighting e.g business and street lighting also need to be covered in Chapter 3.</p> <p>Environmental Health issues also need to be raised under Chapter 3 e.g under para.</p> | <p>DC to be amended to include this.</p> <p>DC to be amended to highlight opportunities for enhancement.</p> <p>DC to be amended to highlight at the earliest opportunity the structure of the report i.e para. 1.11.1 and additional explanatory text to appear towards the start of Section 1. Consideration to be given to chapter layout to improve ease of use e.g perhaps sections on different colours of paper.</p> <p>DC to be amended to include this.</p> <p>DC to be amended to include this.</p> <p>DC to be amended to include this.</p> | <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> |
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|  | <p>3.8 include consideration in layout for positioning of air conditioning units/ extractor fans etc on businesses to be positioned away from dwellings i.e to reduce impact of noise and smells. Also highlight that layout design should aim to minimise manoeuvring and reversing of HGV/delivery vehicles to businesses away from dwellings, as far as possible – again to avoid noise disturbance.</p> <p>Another general sustainable design technique that needs to be highlighted under Chapter 3 is “access for all” i.e layouts etc need to take into account the needs and abilities of everyone to use space. This will include the aim to reduce the provision of steps/uneven surfaces/obstacles within any development. This issue also relates to Para. 3.11.2 storage of recycling bins – these should be easy to manoeuvre hence not requiring the need to go up or down steps/over long distances.</p> <p>Para. 4.3.8 and para. 5.15.1 should be expanded upon to provide a brief description of gateway/arrival space character. Emphasis also needs to be given to importance of wide, landscaped, green verges as a characteristic feature of Daventry.</p> <p>Chapter 8 does not highlight enough the</p> | <p>DC to be amended to include this.</p> <p>DC to be amended to include this.</p> <p>DC to be amended to include</p> | <p>Amend DC</p> <p>Amend DC</p> <p>Amend DC</p> |
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|  | <p>opportunity for contemporary distinctive design in new development.</p> <p>DC to be reviewed to ensure that all photos and figures etc are clearly referenced/indication is clearly given as to what they are illustrating.</p> | <p>this.</p> <p>DC to be amended to include this.</p> | <p>Amend DC</p> |
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***Daventry Design Codes***

***Responses To Sustainability Appraisal Consultation Draft***

The table below sets out a summary of responses received. It should be noted that the four Statutory Consultees are also consulted at the Scoping Stage i.e which takes place prior to the publication of the Sustainability Appraisal (Consultation Draft) (SA-CD) and that any comments at that stage were fed into the preparation of the SA-CD. It should be noted that no comments were received to the Consultation Draft from English Nature or English Heritage (who are the other two Statutory Consultees), however comments were received from English Heritage during the Scoping Stage. At the end, a section has been included which sets out additional key changes proposed by the Senior Planning Officer, Daventry District Council.

**Respondees List**

1. Turley Associates for Danetree Village Consortium
2. The Environment Agency
3. The Countryside Agency

**Abbreviations**

DC = Design Codes  
DDC = Daventry District Council  
SA = Sustainability Appraisal

| Respondee  | Summary of Comment  | Response                                     | Changes to SA and/ or DC |
|--|---|--|--------------------------|
| <b>STATUTORY<br/>CONSULTEES</b>                                    |   |  |                          |
| The Environment Agency   | Echo objectives 8, 9, 10. Strong guidance on waste reduction, re-use and recycling important and should be included in SPD.   | Points welcomed. DC to be amended re- waste. | Amend DC                 |
| The Countryside Agency (Landscape, Access and Recreation Division) | LAR has the following comments on this document: <ul style="list-style-type: none"> <li>• In general LAR supports the sustainability appraisal and considers that it has been carried out using a logical methodology and covering a comprehensive range of issues.</li> <li>• In particular we support objectives SA20, SA21 and SA22.</li> <li>• In the Sustainability Appraisal Scoping Report Comments we are pleased to note that most of the Countryside Agency's comments have either been taken on board or been given adequate explanation.</li> </ul> | Comments welcomed.                           | None                     |
| English Heritage   | No Comments   | None   | None                     |
| English Nature   | No Comments   | None   | None                     |
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| <p>Turley Associates for Danetree Village Consortium</p> | <p>The SA is of considerable use i.e believe DC could be more detailed, more meaningful references to Daventry and greater cross-referential guidance. Endorse SAs view that:</p> <p>Draft SPD is formally unclear as to whether sections relate to the town or urban extensions or both. Structure could be made clearer and more consistent.</p> <p>The draft SPD sees Daventry and urban extensions exclusively, rather than strategically as a whole, with policy discrepancies between the two. This exists in sections relating to wildlife protection; designing out crime; noise; water. SA suggests sections common to both situations, which we echo.</p> <p>Draft SPD could be more prescriptive in giving thresholds for community facilities, presumably echoing emerging infrastructure guidance – useful to see details confirmed/cross-referenced here. Draft SPD does not contain any reference to measures to reduce, reuse, recover or recycle waste or other materials. No mention of archaeology or ICT (Information and Communication Technology). Could signpost other documents, initiatives and useful contacts e.g Biodiversity Action Plan, infrastructure requirements, policy documents relating to sustainable design.</p> | <p>DC to be amended to incorporate these points.</p> | <p>Amend DC</p> |
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|   | <p>Unclear how issues raised in workshop fed into document. Important to demonstrate validity of exercise and document.</p> <p>However, disagree with SA relating to dual use of facilities (school/sports/community) and inadequacy of greenspaces in existing town centre as SPD is explicit in promoting the former and in addressing the later.</p> <p>In terms of energy efficiency, use of renewable technology and promotion of advanced transit system, it is suggested that the document be more realistic in taking into account viability, in particular where costs impacts upon viability, as indicated in government guidance.</p> | <p>SA to be amended to highlight this.</p> <p>DC to be amended to refer to viability.</p>   | <p>Amend SA</p> <p>Amend DC</p>                                 |
| <p>Senior Planning Officer, Daventry District Council</p> | <p>Within the topic of biodiversity, include objective to restore and enhance BAP species/habitats.</p> <p>SA2 and SA3 should read neutral or possible positive impact, as assessment is not supported by quality of existing resource or enhancement proposals.</p> <p>SA7 and SA8 should better reflect need for further consideration of policies and guidance on objectives for water resources. SA7 might be better assessed as neutral or possible positive.</p> <p>SA21 welcomed – use Landscape</p>  | <p>SA to be amended to highlight this.</p> <p>SA to be amended.</p> <p>SA to be amended to highlight this.</p> <p>SA to be amended to highlight</p> | <p>Amend SA</p> <p>Amend SA</p> <p>Amend SA</p> <p>Amend SA</p> |

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|  | Character Assessment as a baseline and modify objective to read “to enhance the quality of landscapes, the countryside, townscape character and local distinctiveness, in keeping with local landscape character, as described in the Northamptonshire Environmental Character Assessment”. | this. |  |
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