

Comments on the Settlements and Countryside Issues and Options Sustainability Appraisal

1a. To which part of the Sustainability Appraisal does this representation relate?			
1b. Do you agree with the findings?			
1c. Please provide a reason for your answer to 1b			
Name	1a	1b	1c and general comments
Welton Parish Council	Page 4-5, Issue 13 Daventry Town Housing Option B	No	Much of the area in Option B would NOT be in proximity to the A 45. Access to the A 45 would necessitate use of the A 361 south in to Daventry, which could affect traffic flows and traffic safety issues. There is already considerable inappropriate HGV use on this road from the vicinity of Danetre Reservoir northwards and vice versa.
	Page 13, 3.4.2	Yes	Potential for cumulative predominantly negative effects is listed, even at this early stage for option B. Particular concerns focus on traffic flows, the Grand Union Canal and its Conservation Area to the north of Daventry as well as landscape and townscape. The cumulative effect of development in the north of Daventry poses a significant risk of causing coalescence with Welton, jeopardising the identity and distinctive character of both the town and the village communities.
	Appendix 2, SO2a Archaeology & Cultural Heritage, Option B	Yes	The potential negative impact on the Country Park Conservation Area and the Grand Union Canal Conservation Area is of major concern.
	Appendix 2 SO9a Landscape Option B	Yes with qualifications	Option B refers to high sensitivity landscape associated with Grand Union Canal and valley to the south east of Braunston. Erroneously in this section there is no mention of the village of Welton and its distinctive setting in the upland landscape.
Anglian Water	Issue 10, Daventry Central Area sites		It is noted that a neutral impact is predicted for Sites 1-4 as outlined in the Issues and Options consultation document in relation to objectives 14a, 14b, 14c and 14d. However it is important to note that there is a need to consider further the implications of these sites in relation to water supply, foul drainage, sewerage treatment and surface water drainage.
	Issue 13, Daventry Town Housing		It is noted that no differentiation is made between Options A-D as outlined in the Issues and Options consultation document in relation to objectives 14a, 14b, 14c and 14d. However it is important to note that there is a need to consider further the implications of these sites in relation to water supply, foul drainage, sewerage treatment and surface water drainage.
Daventry Town Council			Daventry Town Council have referred to the sustainability assessment, appraising the results of the issues and options consultation for the Settlements and Countryside Local Plan and for Gypsies, Travellers and Travelling Show people and advise that they found the report confusing and vague. The Town Council understand the purpose of this report is to promote sustainable development by integrating sustainability considerations into the plan, the actual document would appear to lack purposeful direction and the Town Council would like to have seen a more focussed response, with clear aims that would feed into and assist in the creation of the final submission document.
Framptons on behalf of a number of clients	Issue 22, Policy R1, Table 2.1	No	Framptons act for a number of clients with potential sites in the rural areas of Daventry District. A number of comments and conclusions in the 'Settlements and Countryside Local Plan Part 2A for Daventry - SA of the Issues and Options' cannot be considered compliant with Central Government planning guidance and are therefore unsound. The Government's policy is quite clear in relation to housing provision – namely to significantly boost housing land supply (The Framework para 47). In order to achieve this objective, local planning authorities should: <i>'Use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area.'</i> In relation to Rural Areas the appropriate scale of growth is set by Policy R1, but this methodology fails to take into account local circumstances sufficiently. It is not considered to constitute a fully objectively assessed assessment of need particularly given the time that has now elapsed since the preparation of the WNJCS and its adoption. It would be better if the scale and distribution of growth were allocated based on a robust assessment of existing capacity directly in relation to each particular settlement. Such an assessment would require consideration based on empirical evidence which would be more consistent with the aims of paragraphs 47 and 182 of the Framework. In short, capacity should dictate growth and not arbitrary percentages as this will ensure development is more sustainable, which is the overarching requirement of the Framework. Issue 22 implies that there is no need for rural areas to contribute market housing as the housing amounts for rural areas stated in the Core Strategy have already been exceeded. This is considered a highly negative position for the LPA to adopt given the aforementioned Government position.

		<p>In terms of social and environmental harm there is the potential to cause harm by restricting developments in settlements which may have capacity to sustainably accommodate further growth. Potentially these settlements would be prevented from accommodating needed growth by reason of a policy restriction not bespoke or objectively assessed to that settlement but rigidly imposed. This would appear contrary to the Government's intentions for Neighbourhood Plans in the Localism Act and para 182 of the Framework.</p> <p>For sites which have capacity and a local willingness to accommodate an appropriate scale of growth (e.g. Weedon Bec) where Neighbourhood Plans are progressing with support from the Local Community the policy and SA underpinning the Part 2 Plan should make provision for settlements capable of delivering growth to have it where it is sustainable. Such an approach would be consistent with the recent Brandon Lewis letter to the new Chief Executive of the Planning Inspectorate on the weighting to be given to Neighbourhood Plans, which gives a clear indication of Central Government Support to such matters.</p> <p>It is there highly reasonable to consider different levels of distribution should be considered where supported by a Neighbourhood Plan as it was the Government's intention to significantly boost housing delivery and for the Localism Act to facilitate a bottom up approach to housing where by local communities are empowered. Also Policy R1 of the WNJCS does not state the housing figures are a maximum, a point which has been considered by several Inspectors in determining appeals in DDC in recent months.</p> <p>By placing such arbitrary limitations on a settlement once the allocation has been met the policy cannot be considered positively prepared as a list of exceptions can be considered restrictive and negative when the emphasis of Government Policy is to deliver sustainable growth. Using this approach may mean appropriate growth options are prevented from occurring due to an arbitrary policy requirement that is not supported by empirical evidence which is clearly contrary to the Government's objectives and would disadvantage the local economies and investment.</p> <p>By creating a policy framework and an underpinning SA that enables greater flexibility for growth where it has been demonstrated to be sustainable, deliverable and appropriate in terms of the relevant settlement having capacity there is an opportunity for local growth. This should not be denied to an area by reason of imposing arbitrary delivery quantum from a strategic level document (R1) and would be better considered at a more local level by each respective Local Planning Authority. This would enable development to be brought forward to the benefit of the local areas based on assessment of need and backed up by evidence.</p> <p>The role of the Part 2 Plan and its SA must be to facilitate sustainable development to significantly boost housing growth where such growth contributes to the delivery of sustainable development. Given the time it will take for the CS to be reviewed it is imperative to give certainty and delivery over the remaining 13 years of the CS that future growth can happen and is not frustrated simply by a negative perception of delivery. It is as a result of planning authorities adopting a cautious approach that nationally housing delivery has been frustrated and the country sits in an acute housing crisis. The CS focuses growth at the Towns of Daventry, Towcester, Brackley and Northampton which is logical in sustainability terms, however a number of these strategic sites are not delivery at the anticipated trajectory. In these circumstances the Part 2 Plan should enable greater flexibility in the rural areas where demand is high and as seen in recent years in SNC policies like the 'Interim Rural Housing Policy' have demonstrated sustainable growth can help achieve delivery without damaging sustainability.</p> <p>Another scenario where arbitrary percentages will cause possible social and economic conflict would be if the settlement built out its allocation early in the plan period and in effect then did not require or failed to justify (based on Policy R1's exceptions) development for the remainder of the plan period. This could hypothetically result in a settlement not experiencing growth for many years. Clearly this would result in a lack of investment in the settlement which would harm all services, employment and other benefits of growth. As reports such as the Taylor Report (The Taylor Review of Rural Economy and Affordable Housing) indicate growth that is proportionate and appropriate to a settlement can have many benefits and may sustain services which is highly desirable in rural areas which have limited services in comparison to higher order settlements. Such a restrictive policy cannot be considered positively prepared in this regard.</p> <p>The categorisation of settlements should follow empirical evidence as to the capacity and facilities of the settlement directly in relation to how much growth is appropriate to the settlement. To categorise settlements across the entire DDC area in a strategic level planning document (Part 2 Plan) is always going to result in arbitrary amounts which is inappropriate given circumstances; needs and facilitate change frequently and plans do not adapt.</p> <p>Article 4 Direction - Page 7 of the 'Settlements and Countryside Local Plan Part 2A for Daventry - SA of the Issues and Options' implies without significant explanation that it is</p>
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Gladman	Table 3.1 Appendix 1 Appendix 2 Issue 36	<p>Gladman note that not all of the issues raised in the Issues and Options papers are not considered relevant to undergo the SA process. Footnote 1 of the SA sets out that 'many of the issues merely raise questions to the consultees or are administrative planning issues which relate to how policies might be drafted' and therefore do not constitute a planning issue that could be expected to have reasonable alternatives'. Furthermore, anything tested as part of the WNJCS is not considered to require further testing if it being implemented unchanged.</p> <p>Following a screening exercise, only four issues were considered suitable for appraisal at this stage: Issue 1: Daventry Central Area Sites Issue 13: Daventry Town Housing Issue 15: Specialist Accommodation Issue 36: Development in the open countryside</p> <p>Appendix 1 sets out the results of the screening exercise, including justification for why appraisal of an issue at this stage was not considered necessary or possible. Gladman believe that the SA would benefit from providing more comprehensive justifications, as often the reason given is simply 'it is not possible to assess the issue raised in this question at this stage' without any clue as to why. It is difficult to see on the information provided why certain issues, for example 25 (Settlement Hierarchy) or 27 (Village Confines) cannot be subject to at least a high-level assessment at this stage, with more detailed assessments being undertaken at later plan stages.</p> <p>Although the Part 2 Plan has only reached Issues and Options, PPG1 is clear that 'reasonable alternatives should be identified and considered at an early stage (our emphasis) in the plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach.'</p> <p>For the four issues deemed appropriate, Table 3.1 sets out the results of the assessment with the full assessment described in Appendix 2. The SA notes at paragraph 2.1 that under the SEA regulations 'reasonable alternatives to a plan should be identified and assessed.' Paragraph 2.2 elaborates on this, breaking the process down into two parts: 1. Discuss why it was 'reasonable' to select the alternatives that were developed to be tested; 2. Discuss why the preferred approach was selected in light of the SA of alternatives.</p> <p>Issue 36 deals with restricting development in the open countryside. It states that: <i>In addition to the criteria in paragraph 55 of the NPPF, we consider that development should only be allowed in the open countryside in the following circumstances:</i> A. <i>Re-use or conversion of existing buildings essential for the purposes of employment within the immediate vicinity of the site</i> B. <i>The replacement of an existing dwelling</i></p> <p>The issue also suggests the introduction of an article 4 direction to remove permitted development rights.</p> <p>The SA only assesses an approach which sees the additional criteria added to the criteria in Paragraph 55 of the Framework. Gladman believe that in assessing only this approach the SA fails to identify and assess any reasonable alternative approaches to dealing with development in the Countryside. Having failed to identify any alternative approaches the SA naturally fails to outline why it was reasonable to select alternatives to be tested.</p> <p>To be robust Gladman believe that as part of the assessment of Issue 36 a more permissive approach to development in the Countryside should be tested as well as an approach that lifts any restriction on housing in the Countryside aside from that outlined in Paragraph 55. We consider these to be reasonable alternatives because the approach suggested in Issue 36 is more restrictive than that set out in Framework paragraph 55. Paragraph 55 deals with promoting 'sustainable development in rural areas', requiring that housing be located 'where it will enhance the vitality of rural communities'; it sets further criteria only in relation to 'new isolated homes in the Countryside' not development in the Countryside in general.</p>

		<p>Testing these alternatives would enable the Council to demonstrate why the preferred approach was selected in light of the SA of alternatives.</p> <p>Table 2.5 sets out the criteria against which the approaches will be tested. Criteria SO10a is to 'ensure that the housing stock meets the housing needs of local people' and to test this the assessment should answer the question 'will the plan lead to sufficient housing and affordable housing to meet local needs'. In assessing Issue 36 the SA concludes that 'the criteria will ensure that local needs for housing and employment are met but in a way that does not compromise wider sustainability objectives or lead to development in an unsustainable location with poor access to services'. The approach is given a 'minor positive impact' rating. Without assessing reasonable alternatives it is impossible to determine whether another approach would have a better impact when tested against this criteria, which would then enable a decision to be made as to whether the benefits of this alternative approach outweighed the harms.</p> <p>Conclusions What is clear from the Framework, and from the Government's agenda to boost significantly the supply of housing, is that the premise of the whole process is the assessment and delivery of the full OAN for housing in an area unless there are adverse impacts that would significantly and demonstrably outweigh the benefits. If the process set out in the Framework and PPG is not followed then the Council run the real risk of the plan being found unsound and this will create significant delay and uncertainty in the process. All of our best interests are served by your authority getting a Local Plan found sound at the earliest possible opportunity, rather than us utilising considerable resources on preparing for and attending EIPs, preparing Judicial Reviews etc. This approach will put the authority back in control of planning in their area and will give the Members comfort and certainty over the level and location of development that will take place over the lifetime of the Plan.</p> <p>Gladman have raised concerns in relation to the SA process. If the SA is approached in such a way as presented it will not provide a positive policy approach and it is not consistent with national policy.</p>
Highways England		<p>SAs promote sustainable development by integrating sustainability considerations into the plan making process at all relevant stages including when considering alternative approaches to developing the plan. Highways England notes that the SAs undertaken by Ramboll Environ are for two Issues and Options documents, and that further assessment of alternative approaches is likely to be carried out as the Local Plan Part 2 progresses.</p> <p>It is the role of Highways England to maintain the safe and efficient operation of the strategic road network whilst acting as a delivery partner to national economic growth; in this respect Highways England's principal interest is safeguarding the operation of the M1, A5 and A14 which route through the district.</p> <p>Highways England recently commented on the Local Plan Part 2 Issues and Options documents and stated, in relation to Part 2a, that Transport Assessments would be required in order to assess the potential impact of constructing 511 dwellings to meet the needs of Daventry Town. It was considered that the spatial approach to these locations, as set out in "Issue 13: Daventry Town Housing", combined with the proposed Daventry North East Sustainable Urban extension (4,000 dwellings) may cumulatively impact up on the operation of the strategic road network within the district.</p> <p>Highways England notes that this element of the Issues and Options Paper has been appraised as part of the SA. It is noted that the SA indicates that "there could be a cumulative effect on traffic flows, and further public transport measures are likely to be required". However it is also noted that the SA draws upon transport statistics to indicate that there are no existing traffic hotspots in proximity to any of the development options put forward as part of Issue 13. It is not evident from this analysis that the potential impact of future development on the strategic road network has yet been appropriately considered. Highways England will be happy to work with the authority in order to clarify the potential extent of these cumulative impacts.</p>
Historic England		<p>Although the plans are at a relatively early stage, Historic England do not appear to have been recently consulted on the scoping for the Sustainability Appraisals. Neither of the sustainability appraisals are sufficiently detailed so as to ensure a sound Plan.</p>
	Table 2.2	<p>Within Table 2.2 the appraisal questions to be used as a guide for SA objective 2 in relation to the historic environment appears to be incomplete.</p>
	Table 3.1, Issue 10	<p>There is limited reference to the historic environment. Potential negative effects in relation to cultural heritage are identified in relation to sites 1 and 2, but no further detail is given or reference made within mitigation/enhancement. Daventry town centre contains a wealth of heritage assets and the context of issue 10 is an exciting opportunity to regenerate the town centre, enhancing heritage assets.</p>
	Table 3.1, Issue 13	<p>Potential negative impacts are identified in relation to the protection of cultural heritage also, but again no further detail is given or reference made within mitigation/enhancement.</p>
	Appendix 1, Q33a-d	<p>Historic England would be happy to advise in relation to the historic environment as the Plan develops.</p>
	Appendix 2, Issue 10	<p>Site assessments are welcomed, however no detail is provided of the site assessment criteria or methodology and the assessments are very brief. Without more detail in relation to specific sites it is not possible to comprehensively comment, however I would refer you to my previous letter of 08 March 2016 in relation to Issue 10.</p>
	Appendix 2, Issue 13	<p>Site assessments are again welcomed, however no detail is provided of the site assessment criteria or methodology and the assessments are very brief. Without more detail in relation to specific sites it is not possible to comprehensively comment, however I would again refer you to my previous letter of 08 March 2016 in relation to Issue 13. For examples, concerns were raised in reference to Option A, yet the assessment finds no significant impact upon cultural heritage.</p>

			<p>Overall, we consider that significant amendments are required to ensure soundness and that the requirements of the Directive and Legislation in relation to cultural heritage are met. We are happy to further advise on these as appropriate. I would be very happy to meet with you to discuss.</p>
Natural England			<p>Natural England is generally satisfied with the sustainability objectives identified to assess the impacts of the plan.</p> <p>We recommend the following to ensure the report properly reflects the important natural environmental assets across the county: Table 2.2: SA framework, Section 3. Biodiversity, flora and fauna – We are pleased that the Nene Valley Nature improvement Area has been included within this section, however it should also make specific reference to the internationally protected Nene Valley Gravel Pits Special Protection Area (SPA), which is also listed as Ramsar Site and Site of Special Scientific Interest (SSSI).</p> <p>Section 9. Landscape and townscape could also refer to the National Character Areas which divide England into 159 natural areas, each defined by a unique combination of landscape, biodiversity, geodiversity and economic and cultural activity. The new NCA profiles provide an integrated, locally specific evidence base that can be used for making decisions about the natural environment. The NCAs highlight the significant opportunities in each area and therefore provide a useful planning tool that can help guide the design of projects so that they are appropriate to the locality and deliver the maximum benefits for the natural environment. Daventry falls within: NCA Profile: 95 Northamptonshire Uplands.</p> <p>We are generally supportive of the assessments undertaken; however, we would recommend that the findings of these assessments, especially where mitigation/enhancement is identified for impacts on the natural environment (sites, habitats and protected species), should be carried forward into the relevant policy for the allocation in the plan. This is particularly relevant for the minor negative impact, which has been identified for Issue 13: Daventry Town Housing, Section SO3 for sites A-C as they are adjacent to Local Wildlife sites.</p> <p>Habitat Regulations Assessment (HRA) We note that the HRA screening will be carried out at a draft plan stage. The plan must be screened with respect to The Conservation of Habitats and Species Regulations 2010 (as amended) to determine whether an Appropriate Assessment is required. In addition, the screening needs to consider not just the potential impacts of this plan but also any cumulative or in-combination effects when taking account of other plans and projects, including those in relevant authorities beyond the boundary. We suggest that the process of HRA runs in parallel to the development of the plans. If the HRA process is initiated from the outset, its findings from earlier stages can be used to inform subsequent stages, e.g. preferred options. We look forward to being consulted on this in the near future.</p>
Northampton Borough Council			<p>Thank you for the opportunity to comment on the two Sustainability Appraisals referred to above. We do not have any comments to make on either of these documents.</p>
Sworders on behalf of Messrs Baker	Table 3.1, SA results & Appendix 2, Issue 13	No	<p>These representations are made on behalf of the landowner of Land to the West of Ashby Road to the Sustainability Appraisal (SA) for the Settlements and Countryside Local Plan. A Call for Sites for is submitted for this site alongside this representation.</p> <p>We disagree with the findings summarised in table 3.1 and set out in detail in appendix 2, that Option D performs most positively against the specific SA objectives. It is clear on reviewing the results of the above Option D came out ahead solely because of the nature of the scoring mechanism whereby all objectives and scores are given equal weight. Whilst it is appreciated that all objectives are important, in reality, some should carry more weight than others.</p> <p>Whilst Option D achieved the highest proportion of neutral and minor positive scores and the least number of minor negative scores, it did not score any significant positive scores. Conversely, Options A and B both achieved two significant positive impact scores.</p> <p>The two objectives under which Options A and B scored significant positives were improving access to employment and ensuring that the housing stock meets the housing needs of the local people. It is considered that these two objectives should carry more weight than some of the other objectives which could be overcome with appropriate mitigation measures.</p> <p>In particular, the ability to accommodate the identified housing need should carry significant weight. Of all the options considered, Option D is the only option which cannot meet the identified need of 511 dwellings. As such, whilst Option D has emerged as the most positive under the SA objectives, this option could only deliver the objectives of the Core Strategy, in conjunction with other options. In comparison, any of Options A, B and C would be sufficient alone to meet this need and as such have been correctly scored with a significant positive under the housing objective. Option B can provide the identified need of 511 dwellings.</p> <p>According to the assessment, as well as the significant positive contribution to housing need, Option B is unlikely to contribute to congestion, no</p>

			<p>significant air and noise pollution impacts, improves access to education, would provide health benefits through linking development to the Grand Union Canal, good access to employment and may provide the opportunity to assist in regeneration. We agree with these assessments.</p> <p>Whilst Option B scored a minor negative in regard to protection of cultural heritage features, ecological conservation, protection of existing landscape and townscape and agricultural land, in each instance at least two of the other options scored the same, demonstrating that it is broadly comparable to the other options.</p> <p>Option C understandably performs least well as it sits outside the southern bypass and as such is poorly related to the existing settlement and an unsuitable location for development. We agree with the identification of the site as a reasonable alternative, however, we also agree with the outcome of the assessment that it is the least appropriate growth location.</p>
Sworders on behalf of Berryfields Farm Ltd.	Table 3.1 SA results & Appendix 2, Issue 13	No	<p>These representations are made on behalf of the landowners of Land to the west of the Royal Oak Industrial Estate to the Sustainability Appraisal (SA) for the Settlements and Countryside Local Plan. The site was submitted for employment to the Call for Sites in March 2016.</p> <p>Whilst the SA does not consider Issue 18; Employment Areas, the assessments of options A to D under Issuer 13; Housing is relevant to this site since new housing has the potential to assist in regeneration of the existing employment areas to the north-west of the town.</p> <p>We disagree with the findings summarised in table 3.1 and set out in detail in appendix 2, that Option D performs most positively against the specific SA objectives. It is clear on reviewing the results of the above Option D came out ahead solely because of the nature of the scoring mechanism whereby all objectives and scores are given equal weight. Whilst it is appreciated that all objectives are important, in reality, some should carry more weight than others.</p> <p>Whilst Option D achieved the highest proportion of neutral and minor positive scores and the least number of minor negative scores, it did not score any significant positive scores. Conversely, Options A and B both achieved two significant positive impact scores.</p> <p>The two objectives under which Options A and B scored significant positives were improving access to employment and ensuring that the housing stock meets the housing needs of the local people. It is considered that these two objectives should carry more weight than some of the other objectives which could be overcome with appropriate mitigation measures.</p> <p>Option C understandably performs least well as it sits outside the southern bypass and as such is poorly related to the existing settlement and an unsuitable location for development. We agree with the identification of the site as a reasonable alternative, however, we also agree with the outcome of the assessment that it is the least appropriate growth location.</p>
Sworders on behalf of Morton Trust Trustees	Table 3.1 SA results & Appendix 2, Issue 13	No	<p>These representations are made on behalf of the landowners of Land South-East of Daventry at Burnt Walls to the Sustainability Appraisal (SA) for the Settlements and Countryside Local Plan. The site was submitted to the Call for Sites in March 2016.</p> <p>We disagree with the findings summarised in table 3.1 and set out in detail in appendix 2, that Option D performs most positively against the specific SA objectives. It is clear on reviewing the results of the above Option D came out ahead solely because of the nature of the scoring mechanism whereby all objectives and scores are given equal weight. Whilst it is appreciated that all objectives are important, in reality, some should carry more weight than others.</p> <p>Whilst Option D achieved the highest proportion of neutral and minor positive scores and the least number of minor negative scores, it did not score any significant positive scores. Conversely, Options A and B both achieved two significant positive impact scores.</p> <p>The two objectives under which Options A and B scored significant positives were improving access to employment and ensuring that the housing stock meets the housing needs of the local people. It is considered that these two objectives should carry more weight than some of the other objectives which could be overcome with appropriate mitigation measures.</p> <p>In particular, the ability to accommodate the identified housing need should carry significant weight. Of all the options considered, Option D is the only option which cannot meet the identified need of 511 dwellings. As such, whilst Option D has emerged as the most positive under the SA objectives, this option could only deliver the objectives of the Core Strategy, in conjunction with other options. In comparison, any of Options A, B and C would be sufficient alone to meet this need and as such have been correctly scored with a significant positive under the housing objective. Option A can provide the identified need of 511 dwellings and with an increase in density, could accommodate up to 800 dwellings which would be capable of delivering a new primary school. Option A scored minor positive under the education objective, which could potentially be increased to a significant positive if a new school were provided.</p>

			<p>According to the assessment, as well as the significant positive contribution to housing need, Option A is unlikely to contribute to congestion, no significant air and noise pollution impacts, no significant impact on cultural heritage (although it is recognised that Borough Hill Scheduled Ancient Monument, and Burnt Walls Scheduled Ancient Monument lie on the eastern edge of Daventry's urban area), development to the south east of Daventry could be linked to Daventry Country Park, providing health benefits and there would be good access to existing employment areas to the south-east of the town and may provide the opportunity to assist in regeneration. We agree with these assessments.</p> <p>Whilst Option A scored a minor negative in regard to protection of cultural heritage features, ecological conservation, protection of existing landscape and townscape, in each instance at least two of the other options scored the same, demonstrating that it is broadly comparable to the other options. We disagree with the minor negative assessment of Option A with regard to archaeology and cultural heritage. All of the options scored minor negative, however, the commentary reveals quite different characteristics. Options B, C and D are all assessed as having a potential impact on the setting of heritage assets whereas Option A is assessed as having no significant impact on cultural heritage (although it is recognised that Borough Hill Scheduled Ancient Monument, and Burnt Walls Scheduled Ancient Monument lie on the eastern edge of Daventry's urban area). Despite having no significant impact, it still achieves a minor negative score.</p> <p>Option C understandably performs least well as it sits outside the southern bypass and as such is poorly related to the existing settlement and an unsuitable location for development. We agree with the identification of the site as a reasonable alternative, however, we also agree with the outcome of the assessment that it is the least appropriate growth location.</p>
<p>Sworders on behalf of Mr Peter Norden</p>	<p>Table 3.1 SA results & Appendix 2, Issue 13</p>	<p>No</p>	<p>These representations are made on behalf of the landowner of Land to the north of Mickle Well Park to the Sustainability Appraisal (SA) for the Settlements and Countryside Local Plan. The site was submitted to the Call for Sites in March 2016.</p> <p>We disagree with the findings summarised in table 3.1 and set out in detail in appendix 2, that Option D performs most positively against the specific SA objectives. It is clear on reviewing the results of the above Option D came out ahead solely because of the nature of the scoring mechanism whereby all objectives and scores are given equal weight. Whilst it is appreciated that all objectives are important, in reality, some should carry more weight than others.</p> <p>Whilst Option D achieved the highest proportion of neutral and minor positive scores and the least number of minor negative scores, it did not score any significant positive scores. Conversely, Options A and B both achieved two significant positive impact scores. The two objectives under which Options A and B scored significant positives were improving access to employment and ensuring that the housing stock meets the housing needs of the local people. It is considered that these two objectives should carry more weight than some of the other objectives which could be overcome with appropriate mitigation measures.</p> <p>In particular, the ability to accommodate the identified housing need should carry significant weight. Of all the options considered, Option D is the only option which cannot meet the identified need of 511 dwellings. As such, whilst Option D has emerged as the most positive under the SA objectives, this option could only deliver the objectives of the Core Strategy, in conjunction with other options. In comparison, any of Options A, B and C would be sufficient alone to meet this need and as such have been correctly scored with a significant positive under the housing objective. Option B can provide the identified need of 511 dwellings.</p> <p>According to the assessment, as well as the significant positive contribution to housing need, Option B is unlikely to contribute to congestion, no significant air and noise pollution impacts, improves access to education, would provide health benefits through linking development to the Grand Union Canal, good access to employment and may provide the opportunity to assist in regeneration. We agree with these assessments.</p> <p>Whilst Option B scored a minor negative in regard to protection of cultural heritage features, ecological conservation, protection of existing landscape and townscape and agricultural land, in each instance at least two of the other options scored the same, demonstrating that it is broadly comparable to the other options.</p> <p>Option C understandably performs least well as it sits outside the southern bypass and as such is poorly related to the existing settlement and an unsuitable location for development. We agree with the identification of the site as a reasonable alternative, however, we also agree with the outcome of the assessment that it is the least appropriate growth location.</p>
<p>Environment Agency</p>			<p>The Government has withdrawn the Code for Sustainable Homes and has stated that local planning authorities should consider their existing plan policies on technical housing standards or requirements and update them as appropriate, for example through a partial Local Plan review. We therefore consider it necessary that the Local Plan (part 2a) include a policy for the optional higher standard of 110 litres per day. However, Daventry District Council will</p>

		<p>need to consider further the impact that such a requirement would have on the overall financial viability of the Local Plan. We would refer you to ‘Water efficiency in new developments: A best practice guide’ produced jointly by the NGO Waterwise along with EA Govt Office and a range of water companies in the east of England, which provides indicative costs for achieving different water efficiency targets and suggests that to achieve levels of between 110 and 120lts/p/day will not add any cost to a new home.</p> <p>The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance. An update to the West Northamptonshire Water Cycle Study would provide and up to date evidenced base for a policy for the optional higher standard of 110 litres per day.</p> <p>National Planning Practice Guidance enables local planning authorities to set out the optional water efficiency requirement in a Local Plan where it can be demonstrated that there is a clear need. In doing so reference should be made to the Environment Agency’s water stressed area classification maps and Anglian Water’s Water Resource Management Plan. Daventry sits within an area classified as an area of serious water stress (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf). The water stress classification takes a long-term view of the balance between water availability and the demand for public water supply. It considers where the current and future household demand for water is a high proportion of the current effective rainfall. High population density and high levels of demand increase the pressure on available supplies, as well as environmental factors such as local water resource availability. Future population change and development also contributes, with parts of the East of England forecast to be the fastest growing in England. This demonstrates a clear local need for tighter water efficiency Building Regulations. Accordingly a policy for new developments to achieve a water efficiency standard of 110 litres per person per day is in line with the Government’s Optional Housing Standards for water efficiency (Para 15): http://planningguidance.planningportal.gov.uk/blog/guidance/housing-optional-technical-standards/water-efficiency-standards/.</p> <p>Anglian Waters Water Resource Management Plan http://www.anglianwater.co.uk/_assets/media/WRMP_2015.pdf also provides robust justification for securing the tighter standard of 110 litres per person per day.</p> <p>‘Quantifying the energy and carbon effects of water saving, Environment Agency and Energy Saving Trust’ (2009) found that as sustainable building standards are tightened in new homes, CO2 emissions from hot water use are likely to form a progressively larger component of overall household emissions, and may eventually exceed emissions from heating the home. It finds that more efficient water use could contribute to lower CO2 emissions.</p> <p>You are no doubt aware that the Water Act 2003 (s.83) states that ‘in exercising its function and conducting its affairs, each public authority shall take into account, where relevant, the desirability of conserving water supplied or to be supplied to premises’.</p> <p>The supply of water is limited, so we make sure that it’s managed and used effectively to meet the needs of people and the natural environment. Indeed, water resources are critical to sustainable economic growth and housing development as well as supporting the natural environment. Increasing population and a changing climate will have an impact on water resources in the future. We have a duty to manage water resources in England and to plan how to use them in a sustainable way, now and in the future. We support the use of water efficiency measures to reduce demand on water resources and to accommodate growth in business, housing and population requirements without the need to increase overall consumption. Drivers for water efficiency include: delivery of the objectives under the Water Framework Directive, reducing pressure on wastewater treatment capacity, adapting to the impacts of climate change and reducing domestic energy use. Local plans can help to ensure that water resources are protected and, where evidence justifies, that water efficiency measures are adopted as part of regeneration and development.</p> <p>It is not considered necessary to duplicate the requirements of Policies S11 (CSH Level 4) or BN7A in the Part 2 Local Plan. Indeed, the amended Building Regs now states that the optional requirement of 110 litres per person per day will be required where a planning condition has secured this requirement. A policy to this effect for Daventry would secure this tighter standard for all new housing within the District.</p>
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