

## Summary of Responses to the Part 2a Settlements and Countryside Local Plan Issues and Options

### Issue 1- Duty to Cooperate

Q1. Are there any issues arising under the duty to cooperate and that have not already been addressed that the Local Plan (Part 2a) should consider? In particular: Are there discussions needed with any person or organisation?  Is there need that should be addressed and that is not capable of being met in another area?	
Name	Response
Landform, Micklewell Park (Barton Willmore)	DDC must work with its partners, in particular across West Northamptonshire to understand where unmet need can be accommodated, and if necessary, how this issue might be considered in the Local Plan review.
BRANE, Brixworth - Bob Chattaway	We feel that evidence from local service providers eg Saxon Spires Practice should be obtained rather than just evidence from statutory bodies such as the NHS who may have little local knowledge.
Braunston Parish Council	We would like to know that discussions are actively underway with the owners and potential developers of Daventry NE SUE
Brixworth Neighbourhood Plan Steering Group	Principally the Brixworth Neighbourhood Plan Steering Group believe that DDC co-operates well with stakeholders, but evidence or considered opinion given by those who provide services (i.e school, medical providers etc.) should be considered sympathetically when considering development applications
CC Town Planning- Land at Flore	Whilst it is accepted that DDC continue to cooperate with neighbouring authorities within West Northamptonshire and other relevant stakeholders, it is considered that Daventry may have a greater role to play in the future delivery of housing in West Northants due to the lack of available sites within Northampton Borough. Furthermore, it is considered that the rural areas of Daventry District could play a greater role in the delivery of housing in order to alleviate the pressure for housing both within and surrounding Daventry Town itself.
Church with Chapel Brampton Parish Council	No
CPRE	No
Gladman – Various sites	<p>Daventry clearly needs to consider the requirements of the Duty to Cooperate. Although the WNJCS has been adopted, the development of the Part 2 plans represents another opportunity to consider and strengthen joint working across administrative boundaries, especially as by the time the Part 2 plans are adopted it will have been some time since the WNJCS was adopted and circumstances/evidence may have changed in the intervening period. Most obviously, joint working will be required to address the Northampton-Related Development Area (NRDA), which cannot currently demonstrate a five-year supply of housing land. Paragraph 178 of the Framework states that ‘public bodies have a duty to cooperate on planning issues that cross administrative boundaries’ and paragraph 179 states that ‘local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans’. It goes on to say that ‘joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity. As noted above, addressing the lack of housing land supply in the NRDA is a key example. Paragraph 181 of the Framework further sets out that ‘cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development’.</p> <p>PPG provides further explanation of how the policies contained within the Framework should be interpreted and applied. In terms of the Duty to Cooperate, PPG sets out that ‘local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination’ (my emphasis).</p>
Daventry Town Council	Insufficient information available to comment
East Northamptonshire District Council	As Local Authorities within the same County, it is important to ensure that Daventry District and East Northamptonshire Councils cooperative and work collaboratively to ensure strategic priorities are properly coordinated in our respective local plans in order to meet the requirements of the statutory Duty to Cooperate.

	<p>Recently, at the closing examination session for the North Northamptonshire Joint Core Strategy (JCS) 2011-2031 (27 November 2015), the Inspector confirmed that the JCS (Local Plan Part 1) had fulfilled the Duty to Cooperate. It is important to achieve a similarly positive outcome for the Daventry Local Plan. This response is intended to assist Daventry District Council in complying with the Duty to Cooperate requirements and will assess whether there are any significant strategic matters affecting the two Local Authorities.</p> <p>Overall East Northamptonshire Council is satisfied that the Local Plan as currently drafted does not flag up any particular strategic significance for East Northamptonshire</p>
Geoff Pullin (Resident-Badby)	I expect it to include Rugby, Harborough and Stratford on Avon DCs
Roseneath Estates Ltd (iceniprojects)	We note that the document indicates the Council's priorities to work with neighbouring authorities and other bodies in the preparation of its plan. Local planning authorities have a duty to co-operate on strategic planning issues that cross administrative boundaries. The purpose of the duty to co-operate is to ensure strategic priorities are properly co-ordinated and clearly reflected in Local Plans. The failure to demonstrate compliance with the duty to co-operate would render the plan incapable of being found legally compliant. We therefore urge the Council to consider co-ordination with neighbouring boroughs in the delivery of the Local Plan and encourage the continuation of this through the life of the Plan. If the Development Plan document fails to accord with each of the above requirements, it is incapable of complying with the NPPF.
Kilsby NDP Steering Group for Kilsby Parish Council	There is no reference to cooperation across county borders. This is crucial for the Daventry Plan because the district abuts other counties and local authorities - in particular Rugby, where proposed housing development will have a major impact on roads and other aspects of infrastructure in parts of the Daventry District, but consultation/cooperation with the County Councils in Warwickshire, Leicestershire and Oxfordshire is also very important because of the impact decisions made there could have on Daventry District - and vice versa.
Messrs Jackson (Landmark Planning)	No
Roundhill Northampton (Nathaniel Lichfield & Partners)	<p>There is a very urgent and necessary requirement for Daventry District Council (DDC) to discuss arrangements whereby, in the Part 2a Daventry Local Plan, measures are taken by the allocation of land for housing, to meet the needs of Northampton.</p> <p>Northampton Borough Council (NBC) has confirmed (Planning Committee 27 October 2015), that the Borough is not able to satisfy the government's requirement for the ready availability of a five year supply of housing land. At October 2015, the confirmed housing land supply was 3.76 years and it is likely that as time has progressed, this supply, against the requirement established by the West Northamptonshire Joint Core Strategy (WNJCS) has worsened. In its consideration of the approaches available to remedy the shortfall of housing land in Northampton, the Borough Council has identified three potential sources, as follows:</p> <ol style="list-style-type: none"> <li>1 Increase the speed of delivery from identified sites;</li> <li>2 Progress Part 2 plans and identify non-strategic sites for housing over and above identified windfalls</li> <li>3 Grant permissions for sites not allocated in the existing Development Plan, or included in the windfall assumption.</li> </ol> <p>Discussions between RNL and NBC officers have determined that the only realistic way of securing a remedy to the significant and increasing shortfall in housing land in Northampton is for the Part 2 Plans of the authorities where provision is made for the needs of Northampton in the WNJCS (Daventry and South Northamptonshire), to identify additional deliverable sites in proximity to Northampton in order to meet this need. There is thus an urgent requirement for co-operation between DDC and NBC to identify suitable locations for this additional housing land.</p> <p>Failure to allocate suitably located land to meet this urgent need and to plan for it properly in locations where significant additional benefits of development may be secured will result in a series of ad hoc development proposals coming forward in a variety of locations where these will, if resisted by DDC, inevitably be approved on appeal. DDC will be aware of the precedent already set for this in the case of the site at Welford Road (APP/Y2810/W/15/3011449) in September 2015.</p>
Mark Wesley (resident - Daventry)	No
Northampton Borough Council	<p>Housing and Duty to Cooperate:</p> <p>Whilst it is expected that no additional policies beyond the JCS are required for the NRDA and the SUE's, which are already allocated to meet Northampton's needs, no reference is made in the Issues and Options Paper to the NRDA and the already agreed strategy of meeting Northampton's needs beyond the Borough boundary.</p> <p>The current five year housing land assessment for the NRDA (April 2015) indicates deliverable housing land for the period of 2015-2020 of 3.76 years. The Part 2 Local Plan for Northampton, which has also commenced and Issues consultation is expected in April-June 2016, will seek to ensure that sufficient sites are identified to meet the requirements set out in the JCS to 2029 and specifically to identify sites to maintain the housing land supply. It will be important for DDC (and SNC) to continue to work closely together with NBC to maintain this supply through all three of the Local Plans (Part 2).</p>

	The Daventry Local Plan should also acknowledge the need for infrastructure to meet the wider needs, such as the routes for the Northampton North West Bypass and Northampton Northern Orbital Route. As these schemes become finalised, the route of the North West Bypass, where it passes through Daventry District, and the Northampton Northern Orbital Route should both be safeguarded within the Daventry Local Plan as it progresses to more detailed stages. Funding will be required to meet these needs.
Gallagher Estates and Jennifer Rowden and Priscilla Knight, Charles Kimbell, Stephen Kimbell and Alexander Kimbell, and Mark Mackaness, Simon Mackaness, Shena Roworth and Oliver Mackaness (Pegasus Group)	<p>The Issues and Options paper refers to the Duty to Cooperate and refers to the joint working undertaken in relation to the West Northamptonshire Joint Core Strategy. The Core Strategy was prepared as a joint plan for Northampton, Daventry and South Northamptonshire through the West Northamptonshire Joint Planning Unit.</p> <p>For the Local Plan Part 2a, this will be prepared by Daventry District Council. Joint working will continue to be important in guiding the more detailed plans for the local authorities and also looking forward to a review of the Core Strategy which it is understood is unlikely to be prepared as a joint plan.</p> <p>The Councils need to clearly set out the appropriate mechanisms for joint working going forward both at officer and member level.</p>
Persimmon Homes	As extensive work has been undertaken through the West Northamptonshire Joint Planning Unit the issues arising under the duty to cooperate can be seen to have been successfully negated. However, various stakeholders should be thoroughly consulted with to ensure local need for housing, infrastructure and facilities is established in the proper manner. Suggestions and ideas from relevant stakeholders, combined with technical studies conducted by the District Council for the need for particular facilities and services within a community can be taken on by developers to mitigate against any potential impact on new development and help integrate it into the existing locality. This will also allow for a more efficient process.
Sport England	Work is currently underway with South Northants and Northampton developing strategies for open space, built sports facilities and playing pitches. The evidence from the assessments and strategies should be used to ensure that the right facilities are provided in the right place and that existing facilities are protected or enhanced as required.
Farthingstone Parish Council	No to both bullet point questions.
Tony Dodd (resident - Welton)	Daventry NE SUE has been identified, assessed and adopted by DDC as the primary development site to deliver the required growth yet DDC is not pushing this forward. So many other issues are related to its delivery that the failure to start this is holding back the whole town and district whilst also causing extra pressure on rural communities.
Welton Parish Council	High level discussions with the owners of Daventry North East SUE in order to secure developer involvement as soon as possible.
Badby Parish Council	No.
Mark Wesley (resident - Daventry)	Unknown.
Environment Agency	Environmental geography such as flood risk zones, waste production and movement, water supply and wastewater treatment and wildlife habitat do not coincide with political boundaries. Many environmental matters can only be effectively addressed at a larger than local scale so the duty to cooperate provides an opportunity to work with LPAs to plan effectively for environmental protection and enhancement. We encourage LPAs to plan in a cross boundary way where environmental risks and opportunities are best considered at a larger than local scale. We consider that the following areas in the emerging Local Plan amounts to a cross border strategic matter: Water Resources there is a risk that there is sufficient water resource to serve additional growth across the region. Any Water Cycle Study refresh should consider water resources both for additional growth and the existing plan commitments, taking into account other LPA growth figures in relevant water resource zones.
Hollowell and Teeton Parish Council	No
Sport England	The authority is currently working with Northampton and south Northants to develop strategies for open space, built sports facilities and playing pitches the evidence needs to be used and shared jointly to establish the right facilities in the right location.
Overstone Parish Council	No
Moulton Parish Council	Local Parish Councils should have a major input in to any decisions made in the Local plan.

Weedon Bec Parish Council	Now that there are no regional planning authorities it is essential that the district and county authorities set up mechanisms to keep each other and local residents informed of their plans. The duty to cooperate with the lower tiers of government eg parishes is just as important as with district & county authorities especially where there is a Neighbourhood Plan in place. The district council is not good at this. Parishes with a Neighbourhood Plan should be kept informed and where appropriate involved in strategic discussions/plans and should have a point of contact within DDC who has a duty to regularly keep parishes up to date. At a Town & Parish meeting some 6 months ago a snr. officer of DDC said that DDC had not really 'got a grip' of its duty to cooperate particularly with neighbouring counties e.g. Warwickshire where the big expansion of Rugby is putting pressure on infrastructure especially roads in neighbouring villages in DDC. Please can we be informed what progress has been made and what mechanisms are to be put in place to ensure cooperation at all levels.
David Williams (resident - East Haddon)	The location of camps should be mentioned

## Issue 2- Neighbourhood Plans

Q2. How should the Local Plan address its relationship with Neighbourhood Plans?	
Name	Response
Andrew Granger & Co - Various Sites- various sites	As set out in para 1.22 of the Part 2a Consultation and the NPPF
Mr and Mrs Wills, Owners of the land west of Coton Road, Guilsborough (Barton Willmore)	We consider that the District Council should take a proactive role in assisting Parish Councils that are seeking to progress Neighbourhood Plans. Whilst we appreciate that the rural housing requirement to 2029 in the WNJCS (Policy S1) has been exceeded, we seek to draw attention to the issues that can be caused by seeking to prevent sustainable growth across the rural parts of the District and the negative impact this may have on the Council's ability to demonstrate a five-year supply. Whilst there is an urban focus to development overall, it should not be at the expense of local communities thriving. Furthermore, whilst the Council considers that it has a five-year supply at this time, providing a range of sites in terms of scale and location can only assist in adding flexibility to this position – which should be sought through this document. Consequently, we consider that the District Council should seek to support Neighbourhood Plans in allocating sustainable growth opportunities or at the very least safeguarding land to deliver at an appropriate time.
Anthony Davies (resident - Welton)	Officers progressing the Plan keep close contact with those progressing NPs
BRANE, Brixworth - Bob Chattaway	It is essential that the Local Plan reflects the wishes of local communities by avoiding conflict with Neighbourhood Plans.
Braunston Parish Council	The local plan should be built "bottom up" from neighbourhood plans so that it is truly representative of the communities it serves.
Brixworth Neighbourhood Plan Steering Group	It is critical that Part 2a embraces those Made and emerging Neighbourhood Plans and the objectives of the DDC Part2a Plan and the Neighbourhood Plans are in accord and no parts are in conflict
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)	Paragraphs 16 and 183 to 185 of the NPPF, and Section ID 41 of the PPG explain the purpose of a neighbourhood plan and its relationship with development plan policies and national guidance. Policy R1 of the West Northamptonshire Joint Core Strategy (WNJCS) identifies the relationship between development in rural areas and neighbourhood planning. A Neighbourhood Plan is required to comply with the basic conditions tests i.e. have regard to National Policy, contribute to sustainable development, in general conformity with strategic policies, and compatible with EU obligations. The relationship between Daventry Settlements & Countryside Local Plan (DS&CLP) and Neighbourhood Plans is established in national guidance and the strategic plan for the area. Paragraph 184 of the NPPF indicates that neighbourhood planning provides a tool for local people to get the right types of development, provided this is aligned with the strategic needs and priorities of the wider local area. Policy R1 of the WNJCS allows local communities to identify and meet their own local needs, and also that further residential development could be allocated through a neighbourhood plan. The Moulton NDP seeks to increase the supply of housing and allocate sites, including our client's site at land south of Boughton Road in Moulton. The draft Moulton NDP meets the basic conditions and is consistent with the emerging DS&CLP. A neighbourhood plan is not proposed for Long Buckby.
CC Town Planning- Land at Flore	Whilst the Client agrees that the Local Plan should contain reference to Neighbourhood Plans and the way in which Parish Council's and Neighbourhood Forums should seek advice and guidance from the LPA's in their production, it is considered that those who are legally empowered to conduct neighbourhood planning for their respective neighbourhood areas should be consulted throughout the process of developing the Part 2 Local Plan. Whilst it is not for the Local Plan to be overly prescriptive in regards to what neighbourhood plans should contain, it is considered that

	the document should sufficiently manage expectations and outline what will be expected of parishes and rehearse the fact that whatever the Neighbourhood Forum / Parish Council produce must ultimately be in conformity with the development plan. The importance of the Part 2a plan to the success of neighbourhood planning in the District is clear and the Client welcomes the acknowledgement within the document that the reasoning and evidence informing the production of the Part 2a plan may be relevant in the assessment of emerging NDP's, even before the Local Plan is itself adopted.
Church with Chapel Brampton Parish Council	Neighbourhood Plans are fine but Local Plans often disregard the wishes of the electorate and are therefore of little worth
CPRE	Neighbourhood Plans, like the Local Plan, should be in accordance with the NPPF and Joint Core Strategy and therefore should be complementary to the Local Plan. Local Plans should take precedence on matters of strategy but Neighbourhood Plans should take precedence when dealing with specific local issues not addressed by the Local Plan. Where Village Design Statements have been adopted for communities where it would be uneconomic to produce Neighbourhood Plans, village design statements should be given similar weight to Neighbourhood Plans. Without weight being given to Village Design Statements, there could be under-representation of the views of local communities.
Gladman- various sites	<p>The consultation document sets out that 22 neighbourhood areas have so far been designated and of these only one has undergone examination; a number of plans are progressing in advance of the Part 2 Local Plans and it is currently proposed that the Part 2 Plans will set district-wide policies and make site allocations and neighbourhood plans would be able to introduce policies specific to their areas provided this did not undermine the strategic policies of the Local Plan.</p> <p>The approach outlined above does not adequately deal with the relationship between the Part 2 plans and Neighbourhood Plans, particularly the possibility for conflicts between the Local Plans and emerging Neighbourhood Plans over which sites to allocate. Neighbourhood Plans only have to be in conformity with the adopted plan (currently the WNJCS), so may choose not to allocate any housing in the rural areas as the housing requirement is considered to have been met. This is despite the recognition in the consultation document that the housing so far delivered in the rural area has 'been largely focussed on a number of larger settlements' and that 'some smaller settlements may benefit from development to help meet local housing need and to help sustain services and facilities'.</p> <p>The designated neighbourhood plans are likely to be in rural areas. Whilst the Council considers that the housing requirement for the rural area has been exceeded, it is acknowledged that the requirement is not a ceiling. It is important that further sites are allocated in the rural area to ensure a five-year supply of housing can be maintained throughout the plan period, and to guard against the possibility that the required amount of housing not coming forward in the Daventry Town area. Even made Neighbourhood Plans should not prevent Daventry from allocating additional dwellings in sustainable locations where it is required to help sustain services and facilities and provide affordable housing.</p>
Daventry Town Council	Local Plan should work alongside neighbourhood plans – making reference to District wide strategies to ensure communities are created/developed with sufficient infrastructure to support them.
Brown Developments, Land at Weedon (Framptons)	The Local Plan should support those Local Plans which have a sound evidence base and reflect the aspirations of local communities. The Weedon Bec Plan has taken a long time and been a resource intensive process which is supported by the majority of the community. Where a community identifies the most logical directions for growth based on local knowledge this should be given weight.
Great Oxendon Parish Council	Both should carry equal weight. Approved neighbourhood plans should be listed within the local plan
Guilsborough Parish Council	Unless a conflict with an existing policy at NPPF or existing Local Plans, then the Local Plan Part 2 should follow the lead taken by the current/emerging Neighbourhood plans
Home Builders Federation	The Council should also set out the appropriate relationship between the adopted WNJCS, the Local Plan Part 2A and Neighbourhood Plans. It is important that strategic policies are identified so that Neighbourhood Plans are in general conformity with these policies.
Welton Parish Council	'Made' neighbourhood plans have to conform to the strategic objectives of the local plan and should therefore carry due weight. NPs form a key, mutually compatible component of the overall development plan as shown in 1.4.
Badby Parish Council	Neighbourhood Plans should be compliant with Saved Policies and the Local Plan has to be consistent with the NPPF. Therefore, there should be a mechanism in place to flag up all inconsistencies so that NHPs can be modified at any early stage, to avoid conflict.
Mark Wesley (resident - Daventry)	Neighbourhood plans should always be a reference point but not to detriment of overall strategy
David George (resident - Kilsby)	The policies and wishes of the residents detailed in Neighbourhood Plans should be considered before any new local plans are established

Sport England	The evidence from sports strategies should be shared and agreed with neighbourhoods
Overstone Parish Council	Provision of clear guidance within the document to enable local communities to interpret correctly general conformity
Moulton Parish Council	The Neighbourhood Plan should play an important part in the local plan. By providing clear guidance in the document to enable local communities to interpret general conformity.
Francis Jackson Homes	There is a danger that Neighbourhood Plans are progressing which may not accord with the emerging Part 2 Plan, and give more weighting to the old 1997 Local Plan. The Part 2 Plan needs to carry the more substantive weight as a higher tier policy document, and this must be set out in the plan for the avoidance of doubt. Emerging Neighbourhood Plans should have full and proper regard to the emerging Plan - as whilst said plans are not tested against their policies, in reality, they are likely to be operative within the framework of the Part 2 plan policies for the majority of their lifespan. As such, it is only common sense that this relationship should be encouraged at this juncture.
Weedon Bec Parish Council	Positively an hopefully proactively which has not always been the case up to now. For example if parishes have not already identified preferred sites then DDC should consult/explore the options with residents. Local residents know how the parish functions and often have good ideas if asked; DDC do not ask. Defining the rural settlement hierarchy should be an absolute priority of the S&CLP. DDC not having done this already has caused a lot of anxiety and suspicion among rural communities. If the rural hierarchy was set out and consulted on then there would be opportunities to discuss targeting investment in services/infrastructure etc so that development can be accommodated without loss of standards to make a community more sustainable.
Anthony Davies (resident - Welton)	Officers progressing Local Plan keep contact with those progressing NPs
David Williams (resident - East Haddon)	It should relate to all villages
Maidwell with Draughton Parish Council	When approved Neighbourhood Plans should be fully taken into account.

### Issue 3- Vision

Q3a. To ensure the part 2 Local Plan delivers the vision of the WNJCS it is not considered that the current vision needs to be changed, except to make it specific for the district. Do you agree? Q3b. If no how should it be changed?		
Name	Response	
	3a	3b
Andrew Granger & Co - Various Sites	Yes	
Mr and Mrs Wills, Owners of the land west of Coton Road, Guilsborough (Barton Willmore)		We do not raise objection with the retention of the WNJCS vision except to make it specific to Daventry, however, highlight the Council's intention to support 'vibrant rural communities' and 'a diverse rural economy'. These are aspirations that are not deliverable without sensible and sustainable levels of growth throughout the Plan period in sustainable rural locations such as Guilsborough. The land to the west of Coton Road, by virtue of its location and excellent links to the village core, is extremely well positioned to assist in the sustainable growth of Guilsborough over the Plan period.
Anthony Davies (resident - Welton)	No	Is Daventry really "moving towards a well developed office sector"? Is it not more to logistics? "Conservation areas.....along the Grand Union....." Para 2.16. This idea hasn't been respected at Micklewell.
Boughton Parish Council	Yes	
Braunston Parish Council	Yes	We agree, but consider that the vision could be more closely aligned with the objectives, so there is a clearer read through.
Brixworth Neighbourhood Plan Steering Group	No	Generally the Group is accord with the Visions, except that of 3b. Could we emphasise that development should be concentrated in Daventry and the SUE's as that where existing and new service provision will be found.
CC Town Planning- Land at Flore	Yes	The Client is in agreement with the thrust of the documents vision, and considers the wording, as set out on Page 16 of the document to be largely relevant. However, it is our opinion that reference should be made to rural housing needs as a whole, rather than just affordable needs.

Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Gladman- various sites		<p>If the Plan is to achieve its vision of 'a network of vibrant rural communities' where 'Villages will retain their local distinctiveness and character, providing affordable homes for local people', it will need to continue to allocate and deliver housing in these settlements. They are clearly popular, as evidenced by the rapid delivery of the rural element of the housing requirement. Housing in these areas will be more affordable if a supply here continues to be delivered. Further, the majority of housing in the rural area was delivered with an affordable requirement of only 29%, compared the affordable requirement of 40% for the rural area set out in the WNJCS. The increased requirement for affordable housing set out in the WNJCS suggests that affordability in the rural area remains a significant issue – recognised at paragraph 2.8 of the consultation document which states 'house prices within the rural parts of the District are much higher than within Daventry Town.</p> <p>Affordability is an important issue in the rural parts of the District, an issue raised during the 2012 issues consultation.' This issue will go unaddressed unless further sites are released in the rural area. Without this, the Vision will not be achieved.</p>
Daventry Town Council	No	The vision is idealistic and has no real substance
Geoff Pullin (Resident- Badby)	No	Make sure that the services to support include regular rural bus services and well maintained and widening of well trafficked roads (A, B and C) not just supply water, drainage, gas, electricity, phone and broadband and mobile phone connections.
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	Yes	Except that strong connections to Long Buckby Rail Station should be emphasis in support of sustainable transport
Roseneath Estates Ltd (iceniprojects)		<p>We broadly agree with the Council's view on what should be covered in the vision, in particular the need to continue to retain the local distinctiveness and character in rural communities alongside supporting a diverse rural economy. Roseneath also supports the Council's requirement for high quality housing and offering a superb quality of life for its communities. As a suggestion, the Council could consider inserting a statement to ensure developers maximise sustainability principles and respect the quality of the neighbourhoods in which they are located.</p> <p>We also note the Council's observation of the District's proximity to London and connections to other parts of the UK which makes the area an attractive place to live and ensuring the vitality and viability of the District's rural communities will require provision of homes covering a range of dwelling types, size and tenures to ensure its attractiveness remains. The NPPF takes a positive approach, rather than a protective one, to allowing appropriate development in rural areas. As such, the Council's vision should accurately reflect and support policies continued throughout the rest of the Plan.</p>
Kilsby NDP Steering Group for Kilsby Parish Council	Yes	
Messrs Jackson (Landmark Planning)	No	The reference to affordable housing in paragraph 5 of the draft vision implies that only affordable housing for 'households whose needs are not met by the market' (Affordable Housing definition from Annex 2 to the Framework) will be provided in the rural area. There is an opportunity with the preparation of the Part 2 Plan to revise the Core Strategy vision to include the more wide-ranging scope of affordable housing (including Starter Homes) that government advice is now promoting.
Roundhill Northampton (Nathaniel Lichfield & Partners)		There is a need to make an adjustment to the WNJCS Vision in one small respect. This is to reflect the urgent need for further provision to be made for additional land to be allocated to meet the needs of Northampton for the reason set out above. It is requested that the second paragraph of the Vision is adjusted by the insertion of ' <i>and locations well related to Northampton</i> ' after ' <i>With new development focussed on the towns of Northampton</i> '.
Mark Wesley (resident - Daventry)	No	The vision is quite general and open, the plan needs to nail down the whole development process. In making it specific the plan needs to be fair and focussed and compared against the vision with clear reasons for the interpretation.
Mulberry Property Developments (Pegasus Group)	No	<p>Paragraph 2.5 of the consultation document confirms that the housing requirement for residential development within rural areas has already been achieved through completions and commitments. This has been achieved in just 4 years of the Plan period, with 13 years still remaining. The achievement of the quantitative provisions, set out in the JCS for the rural areas, should not act as a moratorium on additional and sustainable development. To do so would prevent a continuous supply of housing in rural areas which would be contrary to the NPPF. Indeed, the housing requirements set out in Policy S3 of the WNJCS were preceded by the word 'about' in order to provide flexibility to respond to additional needs as these arise.</p> <p>This is particularly relevant where additional development is sustainable, supportive of wider objectives set out in the Plan, including the delivery of affordable housing as a well as supporting local services and facilities. Although the Vision provides only an overarching statement of intent it should recognise that the District's rural areas will</p>

		continue to play an important role in the delivery of housing throughout the remainder of the Plan period, notwithstanding that the quantitative provisions of the JCS having already been met. To confirm the commitment of the District Council to continue to support the delivery of appropriate and sustainable development opportunities within the District's rural areas, the Vision should contain a specific reference to the continued contribution that the rural areas will make to the delivery of housing over the Plan period.
Naseby Parish Council	Yes	
Gallagher Estates and Jennifer Rowden and Priscilla Knight, Charles Kimbell, Stephen Kimbell and Alexander Kimbell, and Mark Mackaness, Simon Mackaness, Shena Roworth and Oliver Mackaness (Pegasus Group)	Yes	The amendment of the WNJCS vision to make it specific to Daventry District for the purposes of the Part 2a Local Plan would seem to be the appropriate approach.
Persimmon Homes	Yes	
Ravensthorpe Parish Council	Yes	
Long Buckby Parish Council	Yes	
Northamptonshire Police	Yes	
Staverton Parish Council	Yes	
Farthingstone Parish Council	Yes	
Althorpe Estates (Lucas Land Planning)	No	The plan vision needs to consider the importance of agriculture to the rural economy of the district-there is nothing mentioned, this is a fundamental part of the rural employment and the local economy of this district and should be mentioned as part of the vision.  In addition and just as important is the need for homes to meet all local housing requirements, not just affordable housing.
Mr DJS & Mrs SE Wilson (residents – Badby)	Yes	
Rentplus (Tetlow King)		A further improvement to the Vision would be to explicitly set out the Council's ambition to provide housing that is suitable for all, including affordable housing. We propose the following wording to achieve this: <i>"...the area will form an outstanding UK location of choice for diverse employment opportunities, high academic and vocational educational attainment, high quality, affordable housing for all and a superb quality of life for its communities."</i>
Copesticks Ltd	No	The vision is based on an out-dated Regional Planning approach to spatial distribution of development.  The vision should understand that rural communities need to grow to remain sustainable and affordable. Preservation of villages for their own sake will lead to increasingly unsustainable futures with aging populations, exerting increasing pressure on services such as GPs and gradual reduction in pupil numbers at village schools. It has been happening for the last two decades and these problems are already evident.  There is a significant disconnect between the strategies for economic development and residential development. DIRFT, other enormous developments around Crick (Costco) and the future growth of th A5 corridor should be matched with appropriate consideration for where employees will work.  The general Core Strategy concept that is being followed is that the majority of District residents will work in Daventry and Northampton, therefore housing is proposed in these locations. However, the strategy does not propose suitable growth close to DIRFT.

		<p>As an example, the new COSTCO warehouse is likely to employ around 700 people, the warehouse is more than twice the size of the previous site at Lutterworth, so it is reasonable to expect that more than 300 new jobs will be created (HCA Employment Densities). Furthermore, the Costco unit is only half of the 1.1 million ft<sup>2</sup> available at the site, so it is reasonable to expect that there could be 1000 new jobs created on the Gazeley site (G. Park).</p> <p>DIRFT phase 3 approved. Eight million ft<sup>2</sup>, 9000 people expected to be employed, in addition to the thousands already employed there.</p> <p>The Plan acknowledges that the JCS is already failing and there is a shortfall of 550 dwellings for Daventry town already. We would strongly urge the Authority to reconsider the spatial approach to recognise, from the Vision onwards, that it is not consistent with how the District is evolving.</p> <p>There needs to be more balanced growth across the District to achieve sustainable and affordable village and moreover, there needs to be homes built close to where tens of thousands of people will work.</p>
Tony Dodd (resident - Welton)	Yes	The vision also notes the existence of the Daventry 2040 masterplan - an adopted policy document - but this consultation seems to drift away from the contents of that masterplan.
Moulton College (Turley)	Yes	
The DM Wood Wills Trust (Berry Bros)	Yes	
Welton Parish Council	No	Some parts of the Vision need to be linked more closely to the Objectives (3.3) e.g. reference to sustainable travel in rural areas, not just the paragraph dealing with DIRFT (objective 3); references to employment opportunities, particularly in agriculture, horticulture and forestry in final paragraph of Vision rather than just 'diverse rural economy' (Objective 11); green infrastructure (Objective 12).
Badby Parish Council	Yes	
Scaldwell Parish Council	Yes	
Environment Agency	Yes	
The Theatres Trust	Yes	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Sport England	Yes	
Overstone Parish Council	Yes	
Moulton Parish Council	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	No	p17 Objective 3, change to read ".....to reduce the need to travel, shorten travel distances and ENSURE TRAVEL CORRIDORS ARE FREE FROM CONGESTION SO THAT sustainable travel is a priority...." Reason - more income is probably brought to this district from commuters than people working locally so people need to get to train stations and interchanges that have reliable and frequent services is Northampton & MK not Long Buckby.
Anthony Davies (resident - Welton)	No	Is Daventry really "moving towards a well developed office sector"? My impression is more towards logistics. Will DIRFT expect to have links with the UTC

David Williams (resident - East Haddon)	No	Location of sites should be identified
Maidwell with Draughton Parish Council	Yes	

#### Issue 4- Objectives

Q4a. To ensure the part 2 Local Plan delivers the objectives of the WNJCS it is not considered that the current objectives need to be changed, except to make them specific for the district. Do you agree? Q4b. If no how should it be changed?		
Name	Response	
	4a	4b
Andrew Granger & Co - Various Sites	No	Para 3.3 Objective 9 Housing seeks to direct the majority of new homes to the urban areas of Northampton and Daventry; and restrict new housing in the rural area. Objective 10 seeks to protect and support rural communities to ensure they remain vital. Paras 2.5 and 2.6 highlight the increasing demand for new homes in the rural area, and the considerable deficiency in the delivery of affordable homes. It is unreasonable and unrealistic to pursue objectives and policies which do not meet these needs and demands. The requirements for the rural area need to be more realistically related to these factors in order to achieve these objectives.
Mr and Mrs Wills, Owners of the land west of Coton Road, Guilsborough (Barton Willmore)		We do not raise objection with the retention of the WNJCS objectives except to make it specific to Daventry, however, highlight objective 9 to deliver rural housing to support local services and 10 to ensure rural communities thrive and remain vital. For the reasons set out above in relation to Issue 3, we again consider the land west of Coton Road in Guilsborough to be a good location for the Council to meet their stated objectives. In terms of objective 14, we consider that this Site can be delivered whilst respecting the heritage assets nearby and the development can indeed be advantageous to those features through the provision of landscaping and car parking for the Church.
Anthony Davies (resident - Welton)	No	The internet is providing increased opportunity for homeworking and access to services. Therefore an objective should be to ensure access to fast broadband connections. Again as my comment under Vision, the Micklewell development (Para 5.26) obscures the ventilation shafts and line of the canal. So how can you write an objective that will be adhered to?
Boughton Parish Council	Yes	
BRANE, Brixworth - Bob Chattaway	No	Objective 10 A final sentence should be added stating ' Villages providing services used by the residents of other nearby villages should not be over developed so that these services and other aspects of their infrastructure become overburdened
Braunston Parish Council	Yes	We agree, but consider that the vision could be more closely aligned with the objectives, so there is a clearer read through.
Brixworth Neighbourhood Plan Steering Group	Yes	
Chris Myers (Resident- Long Buckby)		Objective 10 for Rural Communities seems more abstract than Objective 4 for Urban Communities which includes mention of "social cohesion" and "deprivation". Social cohesion should be promoted in rural communities and deprivation acknowledged. I believe that it was in 2003 that a study of rural poverty in Daventry District was published by DDC having been commissioned by the Council.
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Gladman- various sites		Gladman note that Objective 9 is 'to provide a range of housing in sustainable locations to ensure all residents have access to a home that they can afford and that meets their needs'. Objective 10 is 'to protect and support rural communities to ensure they thrive and remain vital'. These will only be achieved if housing continues to be allowed in the rural areas, where people clearly want to live. A moratorium of development in the rural area for the remainder of the plan period would compromise the Plan's ability to achieve these objectives.
Daventry Town Council		The objectives should have strong factual foundations on which communities can develop.

Geoff Pullin (Resident-Badby)	No	See above
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	No	
Northamptonshire County Council (Heather Webb)		Objective 12 relates specifically to green infrastructure within the planned Sustainable Urban Extensions at Daventry and Northampton. While this serves the majority of district residents it does not address GI in the rural areas. Admittedly there is reduced potential for development-resourced GI enhancement in rural communities. However section 6 of the consultation document acknowledges that despite already exceeding rural housing requirements over the plan period, the council could yet permit new rural development under certain circumstances. The LPP2a should therefore include some policy wording on how these small developments should contribute to the overall objective of improving GI across the district. Regarding Objective 12 itself I suggest rewording it to remove the specific reference to the SUEs.
Highways England		As stated in Local Plan Part 2a (Settlements and Countryside), Highways England welcomes Objective 3 – Connections, “to reduce the need to travel, shorten travel distances and make sustainable travel a priority by maximising the use of alternative travel modes”, which will help to reduce vehicle trips on the highway network.
Historic England		Objective 14 is supported
Kilsby NDP Steering Group for Kilsby Parish Council	No	We believe that Objective 1 should include specific referenced to incorporating energy efficient systems in new build projects. The current wording - 'Promoting sustainable design and construction in all new development' is not felt to be strong enough.
Messrs Jackson (Landmark Planning)	No	In common with the point above, Objective 9 (Housing) is too narrowly focused on local needs in the rural area and risks missing opportunities to significantly boost the supply of housing on suitable sites in the rural area.
Roundhill Northampton (Nathaniel Lichfield & Partners)		There is a need to make an adjustment to the WNJCS Objectives. This is to reflect the urgent need for further provision to be made for additional land to be allocated to meet the needs of Northampton for the reason set out above.  It is requested that the Part 2 Local plan, makes clear that for Daventry district, Objective 9 is considered to be varies to accommodate the allocation of land for development to meet the needs of Northampton. The wording of Objective 9 should be amended to add ' <i>and areas well related to Northampton</i> ' after ' <i>Housing development will be focussed at the most sustainable location of Northampton</i> '.
Mark Wesley (resident - Daventry)	Yes	
Mulberry Property Developments (Pegasus Group)	No	Objectives should be aspirational but realistic and should not be applied as a basis for resisting appropriate and sustainable development from being delivered. It is a Core Planning Principle, set out at Paragraph 17 of the NPPF, that the Local Plan should respond positively to wider opportunities for growth. Objective 9 of the JCS sets out the basic elements of the Spatial Strategy, i.e. the urban focus. Given that housing delivery in the District’s rural areas has already exceeded the quantitative provisions of the JCS in just 4 years of the Plan period, it is considered necessary for this objective to be updated so that it is clear that additional opportunities for sustainable development, that supports existing communities and is consistent with wider strategic objectives, will be considered within a sufficiently positive policy framework. As a result of the early delivery of housing in the District’s rural areas, such that there is no longer a specific quantitative requirement upon which housing proposals can be considered, this should not act as a moratorium on new development opportunities from coming forward. It is therefore necessary that the Housing Objective (Objective 9) is updated to demonstrate that the rural areas will continue to play an important role in housing delivery throughout the remainder of the Plan period.
Naseby Parish Council	Yes	Reference to tourism should be included within objective 11 – rural diversification and employment.
Natural England		Natural England is supportive of Objective 1 Climate Change which includes adaptation to climate change as well as the promotion of renewable energy within the district. We are also supportive of Objective 12 Green Infrastructure which promotes the protection and enhancement of the natural environment as well as opportunities for informal recreation.
Gallagher Estates and Jennifer Rowden and Priscilla Knight, Charles Kimbell, Stephen Kimbell and Alexander Kimbell, and Mark Mackaness, Simon Mackaness, Shena Roworth	Yes	The amendment of the WNJCS objectives to make them specific to Daventry District for the purposes of the Part 2a Local Plan would seem to be the appropriate approach.

and Oliver Mackaness (Pegasus Group)		
Persimmon Homes	Yes	
Ravensthorpe Parish Council	Yes	It is vital that Objectives 1-14 as laid out in this consultation document are honoured in practice, as it seems that certain objectives do not have a sufficiently high priority.  Examples include: promotion of sustainable transport (Objective 1), addressing rural social exclusion for those without access to a private car (Objective 3), and achieving high quality design, taking account of local character (Objective 13).
Long Buckby Parish Council	Yes	
Northamptonshire Police	No	Objective 13 High Quality Design should have a reference to safe SECURE healthy and attractive place for residents, visitors and businesses.
Sport England		Sport England considers that an objective around promoting healthy communities should be added section 8 of NPPF para 70, 73 and 74
Staverton Parish Council	Yes	
Farthingstone Parish Council	Yes	
Corby Borough Council		Objective 9: This could be confusing to someone who does not know the area well and may think that Northampton comes within Daventry overall, rather than just land on the outskirts.
Althorpe Estates (Lucas Land Planning)	No	Once again with respect to objective 9 Housing: development in the rural areas must meet all housing requirements.
Mr DJS & Mrs SE Wilson (residents – Badby)	Yes	
Rentplus (Tetlow King)		The Government’s recent consultation on the proposed amendments to national policy explicitly indicates that the affordable housing definition may be amended to incorporate ‘innovative’ rent to buy housing in order to boost opportunities for home ownership. The Council’s Objectives should be updated to reflect this, recognising new models of affordable housing. We recommend the following changes to <b>Objective 9</b> : <i>“To provide a range of housing in sustainable locations to ensure all residents have access to a home that they can afford and that meets their <u>needs and aspirations</u>. Housing development will be focused at the most sustainable location of Northampton, supported by Daventry with limited development in the rural areas to provide for local needs and support local services.”</i>
Copesticks Ltd	No	Objective 1 - Should include the provision that new housing and employment development should be located such as to reduce the need to travel.  Build homes close to where people work and build employment close to where people live.  Objective 3 seeks to reduce the need to travel and to shorten travel distances, by maximising the use of alternative travel modes. Alternative travel modes will not reduce the need to travel or shorten travel distances. This can only be done by building new homes close to where people work.  Objective 6 Emphasises the internationally well placed location, referencing DIRFT  Objective 9 Suggests that housing development will be focused on the urban areas, with limited development in the rural areas.  This is not consistent with reducing the need to travel and the international location, which is located in the rural area.
Tony Dodd (resident - Welton)	Yes	The objectives also need to be harmonised with the adopted Daventry 2040 masterplan.
Moulton College (Turley)	Yes	

The DM Wood Wills Trust (Berry Bros)	Yes	
Welton Parish Council	Yes	Incorporate a reference in the next consultation to 4.63 from the WNJCS in the section on Objectives as this mentions that specific targets have been set for each Objective as well as the Monitoring and Implementation Framework in Section 17 of the WNJCS.  Objective 5 add: 'making it the place of first choice for local communities in terms of retail and leisure provision'.
Badby Parish Council	Yes	
Scaldwell Parish Council	Yes	
Environment Agency	No	The consideration of land contamination, protection and enhancement of controlled waters via the planning regime has always been a key material consideration. However in many instances consideration of land contamination and controlled waters at planning stage is too late. Groundwater in particular, is not a boundary issue and ensuring an area wide holistic approach when considering such a valuable resource is much more effective at strategic design stage. Given the above we would like to recommend that an objective be included within the Local Plan to Protect and enhance the wider environment giving particular attention to dealing with controlled waters. The document detailed below highlights best practice and would make a suitable reference to support achievement of the objective.
The Theatres Trust	Yes	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Sport England	No	There should be a objective with regard to health communities NPPF section 8 paragraph 70, 73 and 74.
Nikolas Moore (resident - Boughton)	No	Daventry District has already seen a 10% increase in population in the last ten years and forecast 10% increase in the next ten years. Why must we have to accommodate all of these extra people - no democratic mandate to impose this increase on an already stretched area. Far more than other equivalent areas are having to accommodate - it isn't clear why we have to take more than a proportionate increase in the acknowledged general increase in population. The areas around where I live are already being surrounded in sprawling estates of dormitory housing which is ruining the established character of the area and I expect the Local Plan to address this serious issue.
Overstone Parish Council	Yes	
Moulton Parish Council	Yes	
Francis Jackson Homes	No	Not only should the objectives be made District specific, the opportunity should be taken to review and refresh these at the local level in light of recent national planning policy changes since the adoption of the WNJCSS.
Weedon Bec Parish Council	No	see 3b previous
Anthony Davies (resident - Welton)	No	The internet is providing increased opportunity for home working and access to services. Therefore an objective should be to ensure access to fast broadband connections
David Williams (resident - East Haddon)	Yes	
Maidwell with Draughton Parish Council	Yes	

**Issue 5- Presumption in favour of sustainable development- Policy SA**

Q5a. Further to that which is included in the WNJCS it is not considered necessary for this Local Plan to include an additional policy on the presumption in favour of sustainable development. Do you agree? Q5b. If no, why not?		
Name	Response	
	5a	5b
Anthony Davies (resident - Welton)	Yes	
Boughton Parish Council	Yes	
BRANE, Brixworth - Bob Chattaway	Yes	
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	Yes	
CC Town Planning- Land at Flore	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	Note- In the transitional period between now and the Local Plan coming into force which will replace reserved policies, there should be a clear and explicit statement making it clear that communities and planning authority do not consider the reserved policies to be "out of date" and that they remain in force unless they conflict with the NPPF and/or WNJCS. Without such a statement, on appeal reserved policies might be ignored on the grounds that they are "out of date" which is clearly not the case as they have the support of our communities. They offer protection against many potential speculative inappropriate developments.
Gladman- various sites		Gladman do not see any harm in the Part 2 Plan making absolutely clear that in line with both the Framework and the WNJCS that the presumption in favour of sustainable development will apply. Doing so ensures clarity and continuity across all the relevant plans and shows a commitment to applying this policy rigorously.
Daventry Town Council	Yes	
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	Yes	
Kilsby NDP Steering Group for Kilsby Parish Council	Yes	Amplification of our support for the proposed line.  We believe that the wording in the WNJCS is already sufficiently strong, and indeed are concerned that it refers to the presumption in favour of sustainable development taking effect 'where....relevant policies are out of date at the time of making the decision', which could mean that saved policies will be over-ridden.
Messrs Jackson (Landmark Planning)	Yes	
Mark Wesley (resident - Daventry)	Yes	
Mulberry Property Developments (Pegasus Group)	Yes	Policy SA is supported as it accurately reflects the presumption in favour of sustainable development as set out in the National Planning Policy Framework. We support the recognition within Policy SA that the Council will take a "positive approach that reflects the presumption in favour of sustainable development ...". This has greater relevance in the context of Daventry's rural areas as the concern is that the fact that the quantitative requirement for rural areas has already been met, will result in a policy of resistance to additional, sustainable development opportunities. The "positive approach" described in Policy SA should be a cornerstone of the Local Plan Part 2a as it is prepared and it should form the basis for the positive policy framework considered necessary to ensure that additional development in the District's rural areas can be supported.

Naseby Parish Council	Yes	
Gallagher Estates and Jennifer Rowden and Priscilla Knight, Charles Kimbell, Stephen Kimbell and Alexander Kimbell, and Mark Mackaness, Simon Mackaness, Shena Roworth and Oliver Mackaness (Pegasus Group)	Yes	It is not necessary for the Local Plan Part 2a to include an additional policy on sustainable development. This is clearly set out in the adopted Core Strategy Policy and in the National Planning Policy Framework.
Persimmon Homes	Yes	
Ravensthorpe Parish Council	Yes	
Long Buckby Parish Council	Yes	
Northamptonshire Police	Yes	
Staverton Parish Council	No	Individual applications should be assessed on their own merits.
Farthingstone Parish Council	Yes	
Althorpe Estates (Lucas Land Planning)	Yes	It is quite confusing to add the Core Strategy policy into this plan.
Mr DJS & Mrs SE Wilson (residents – Badby)	Yes	
Copesticks Ltd	Yes	
Tony Dodd (resident - Welton)	Yes	The district has a surfeit of granted permissions, either as outline or in more detail, that developers have failed to start. These must be brought forward rather than the land being held for greater profit before further sites are allocated under the excuse of "presumption in favour of sustainable development".  Equally, the infrastructure in the district is seriously behind the rate of new home builds and has to catch up if "sustainable development" is to happen. Developers pay less in contributions for rural sites than for urban sites, they seem to provide less infrastructure for these. Rural sites always deliver a premium to the developer, hence why they will push for rural rather than urban. Daventry really needs managed development if it is to stop its own decline.
The DM Wood Wills Trust (Berry Bros)	Yes	
Welford Parish Council	Yes	
Welton Parish Council	Yes	
Badby Parish Council	Yes	
Scaldwell Parish Council	Yes	
Environment Agency	Yes	

The Theatres Trust	Yes	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Sport England	Yes	
Overstone Parish Council	Yes	
Moulton Parish Council	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	No	It is difficult to agree to this as there is no definition of sustainable development in your appendix. Presumably DDC consider that SUE's are sustainable and if so the justification for this needs to be set out in the S&CLP
Anthony Davies (resident - Welton)	Yes	
David Williams (resident - East Haddon)	Yes	
Maidwell with Draughton Parish Council	Yes	

#### Issue 6- Regeneration of Daventry Town- Policy D1

Q6a. Does the plan need to include anything further to supplement Policy D1? Q6b. If yes, what should be included?		
Name	Response	
	6a	6b
Anthony Davies (resident - Welton)	No	
Braunston Parish Council	Yes	We believe regeneration of the town would be aided by a 'green circle', separating development in and close by the town from the area around it. In particular, we would like to include an area of separation between Daventry and Braunston ( NW of Daventry), as per the Braunston Neighbourhood Plan Policy G and the Daventry Masterplan 2040.
Brixworth Neighbourhood Plan Steering Group	No	
Church with Chapel Brampton Parish Council	No	
CPRE	No	
Daventry Town Council	Yes	Need to include plans for education expansion and regeneration (in particular secondary education)
Guilsborough Parish Council	Yes	Key issue is to allow flexibility to relocate poor quality/old employment areas near the centre of Daventry with housing, leisure or retail and relocate employment to edge of town on new sites

Historic England		Daventry should seek to build on its strengths and ensure that the retention of independent shops within the historic area is encouraged through planning and other measures (affordable rents / business rates etc.) and public realm improvements, where necessary. This will help to retain the character of the town centre and ensure that historic buildings are kept in use and maintained. A policy or criteria to reflect this and the importance of the historic environment to the town centre would be welcomed.
Kilsby NDP Steering Group for Kilsby Parish Council	No	Policy D1g refers to the provision of the Daventry Development Link A45 corridor improvement from Daventry to Northampton. We feel strongly that there also needs to be reference to the need for improvement of the Daventry-DIRFT corridor - via the A361 and the A5 - which will come under increasing pressure as DIRFT expands (both from HGV traffic and people commuting to work at DIRFT) and the Rugby SUE is built. The proposed new station outside Rugby will also bring more traffic onto this corridor.
Daventry Marches Limited (Nathaniel Lichfield & Partners)		West Northamptonshire Joint Core Strategy (WNJCS) Policy D1 describes the key locations of development for housing at Daventry. This policy should be supplemented by reference to land at Daventry South East to provide for housing and mixed use development to meet the needs of Daventry Town.  Land at Daventry South \East is a deliverable, sustainable and available site, where housing and mixed use development can contribute to meeting the Town's needs within the forthcoming 5-year period. A submission has been made the Daventry District Council Call for Sites exercise in this regard.
Mark Wesley (resident - Daventry)	Yes	Concerns over no overarching policy for provision of health and education as expansion occurs. Piecemeal additions not achieving critical size or in wrong location are not acceptable going forward.
Naseby Parish Council		No comment as Naseby is more associated with Market Harborough which is far closer.
Persimmon Homes	No	
Long Buckby Parish Council	No	
Northamptonshire Police	No	
Staverton Parish Council	No	
Althorpe Estates (Lucas Land Planning)	No	Once again rather confusing to add the Core Strategy policy into this plan.
Tony Dodd (resident - Welton)	Yes	Reference to the Daventry 2040 masterplan and to the need to regenerate other areas in the town after Southbrook.
The DM Wood Wills Trust (Berry Bros)	No	
B & L Whitfield and Sons and Prologis UK Ltd (Berry Bros)	Yes	(selected paragraphs of submission)  To support the growing population the Core Strategy at Policy D1 advises jobs growth will be via the retention of existing employment areas and by encouraging their regeneration and renewal and by new employment provision at the town centre regeneration schemes. The proposed housing development at Monksmoor and Daventry North East SUE will provide only small scale local employment opportunities connected with the provision of local centres.  In our view the limiting of employment land to existing sites and town centre redevelopment sites with only minimal employment opportunities at urban extensions will not fully support jobs growth for a growing settlement. Limiting job availability locally may restrict housing growth and ultimately impact on the vision for Daventry's growth. We therefore believe that a broader portfolio of employment sites should be brought to the market at Daventry including green field sites. Whilst these need not be extensive so that opportunities for the regeneration and redevelopment of existing sites is threatened, a wider site portfolio would encourage new commercial development to locate and encourage inward investment and an appetite to supply housing.  There is clear and strong evidence that there is a need and demand for smaller scale B2 and B8 sites and in this regard I attach a commentary from Mr Franco Capella of Burbage Realty, logistics and industrial property consultants. The commentary sets out the severe lack of supply set against the continuing high demand.  The part 2 Local Plan must equally be supported by a robust evidence base that underpins its policy direction. We therefore recommend to the Council a refined and locally based employment and economic assessment to better understand the local dynamics of employment land supply and demand.  In our view there is a clearly identifiable lack of sufficient land for nonstrategic B2 and B8 to meet current market demands locally and a clearly suitable site exists as an

		<p>extension to Apex Park to meet this demand.</p> <p>In addition since the Core Strategy was conceived the Government has introduced new permitted development rights allowing for the conversion of office and light industrial buildings to other uses including residential without the need for planning permission. There is therefore a potential for the general loss of employment development and employment opportunities in Daventry town which the Council cannot resist and which the Core Strategy did not and could not foresee. The need to assess these implications by a revised and update evidence base and to redress this imbalance by the provision and allocations of new dedicated employment sites is further highlighted and the opportunity now exists through the Local Plan making process to redress employment land loss.</p> <p>As set out above we believe Daventry's growth is likely to be stunted by an inadequate employment land supply and particularly that related to non-strategic B2 and B8 and permitted development rights have the opportunity to further reduce employment opportunities. In addition to which it is noted that the Daventry North East SUE has not progressed as anticipated and will not deliver housing to the timescales originally envisaged. Hence the Local Plan as identified through the Issues and Options consultation, is seeking to bridge the gap in housing delivery by identifying possible directions of growth for new housing sites to accommodate about 500 houses on the edge of the urban area. As well as a shortfall of housing delivery within the plan period there will equally be some shortfall in employment provision by the delayed delivery of the SUE which was expected to provide some employment provision through its local centres. Consequently the Local Plan should be making provision to address this employment land shortfall in order to provide a suitable balance of homes and jobs and maintain and improve the sustainability of Daventry as a self-sufficient settlement.</p>
Welton Parish Council	Yes	References to Daventry Masterplan 2040 and to other areas requiring community regeneration (para d).
Badby Parish Council	No	
The Theatres Trust	Yes	We note the accompanying text in para 5.1 notes 'growth will need to take place in a manner that protects and enhances the existing community and cultural facilities'. However, this isn't reflected in Policy D1. We therefore recommend greater cultural content in local Plan 2 to support this aspiration, potentially with a policy for promoting culture and cultural activity to reflect the guidance in para 70 of the NPPF.
David George (resident - Kilsby)	Yes	The A361/A5 corridor and DIRFT expansion.
Sport England	No	
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Overstone Parish Council	No	
Moulton Parish Council	No	
Francis Jackson Homes	No	
Weedon Bec Parish Council	Yes	It needs to refocus/update its ideas e.g. Policy D1e) cannot see the point of 'additional' retail space within the town centre when so many units are empty, charity shops or yet more coffee shops. Shopping habits have changed and Daventry has been too slow off the mark; it is not going to be able to compete with the likes of Rugby (for size) of Banbury (for character and variety). Unless Daventry can attract some quality retail of large stores (M&S, Debenhams) then why not accept that it is a small market centre and concentrate on improving the edge of town shopping offer where people can drop in on their way home - more environmentally friendly as less travel. For Weedon residents Sixfields has a more attractive offer than Daventry. Policy D2 - see comments re D1 above - so no cinema & new library then? The town will remain a small market town without such amenities with no hope of regeneration. Weedon notes that policy D 1 g refers to the DDL corridor only as a link between Daventry & Northampton as an impetus to the development of Daventry town. Have you thought that it might be equally useful for development elsewhere especially Weedon to expand employment opportunities with better links to Cavalry Fields and development of the Depot. We regret that the Daventry town perspective seems to dominate your thinking.
Anthony Davies (resident - Welton)	No	

David Williams (resident - East Haddon)	Yes	Locate sites
Savills (Christ Church, Oxford)		Straightforward amendment should be made to supplement bullet (a) of Policy D1 of the WJCS relating to The Regeneration of Daventry Town. Such amendment should simply refer to the additional allocation(s) made at Daventry through the Settlements and Countryside Local Plan (Part 2a).

### Issue 7- Community Regeneration

<p>Q7a. What approach should the plan take regarding areas of community regeneration?  Option A – specific place-based policies  Option B - A general town-wide policy on regeneration areas  Option C - There are already adequate policies in the Joint Core Strategy  Option D - Alternative not listed above  Q7b. If you have selected Option A, please specify which areas need to be given their own policy and what the policy should cover?  Q7c. If you have selected Option D, please provide details of your alternative suggestion.</p>		
Name	Response	
	7a	7b or 7C
Anthony Davies (resident - Welton)	Option B	
Braunston Parish Council	Yes	
Church with Chapel Brampton Parish Council	Option B	
CPRE	Option B	
Daventry Town Council	Option B	
Geoff Pullin (Resident- Badby)	Option B	
Kilsby NDP Steering Group for Kilsby Parish Council	Option B	
Mark Wesley (resident - Daventry)	Option B	
Persimmon Homes	Option A	Proposed regeneration areas should require their own specific policy that sets the ways in which the regeneration of an area will be achieved.
Long Buckby Parish Council	Option B	
Northamptonshire Police	Option A	In order for community regeneration to be successful it should be honed to meet the needs of the community in question. A town wide approach is too generic. One size policies do not always fit all.
Staverton Parish Council	Option B	
Tony Dodd (resident - Welton)	Option A	Southbrook is the highest priority - identified in the WJCS and in previous consultations. Grange and Headlands have reasonable claims but are not as badly depressed as Southbrook.
Welton Parish Council	Option A	Southbrook and other areas mentioned in the previous consultation. Make use of policy D4 in the WJCS.
The Theatres Trust	Option B	
David George (resident - Kilsby)	Option B	
Hollowell and Teeton Parish Council	Option B	
Sport England	Option A	7b) None known. 7c) no
Nikolas Moore (resident - Boughton)	Option C	
Francis Jackson Homes	Option A	7b) For local respondents to determine. 7c) We did not respond with Option D.
Weedon Bec Parish Council	Option D	Weedon has no view on this
Anthony Davies (resident -	Option B	

Welton)		
David Williams (resident - East Haddon)	Option C	

### Issue 8 - Daventry Town Centre

Q8a. Is the Town Centre boundary shown in figure 3 correct? Q8b. If no please indicate how it should be changed?		
Name	Response	
	8a	8b
Anthony Davies (resident - Welton)	No	It is strange not to include Station Close and Abbey Retail Park in the centre
Braunston Parish Council	No	We think there is merit in including the Abbey Retail Park as part of the primary shopping area.
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Daventry Town Council	Yes	
Geoff Pullin (Resident- Badby)	No	Why are the old gasworks, open swimming pool and Ashby Road schools/ academies, council offices, Abbey retail park (Homebase), Vicar Lane businesses not included?  What would be the effect if they were, on who and how?
Badby Parish Council	Yes	
David George (resident - Kilsby)	yes	
Hollowell and Teeton Parish Council	Yes	
Sport England	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	No	Why have an artificial boundary at all? Surely a town centre grows organically as the town grows? A boundary restricts innovative development and Daventry certainly needs that!
Anthony Davies (resident - Welton)	No	It is strange not to include Station Close and Abbey Retail Park in the centre
David Williams (resident - East Haddon)	Yes	

Q8c. Is the Primary Shopping Area shown in figure 3 correct? Q8d. If no please indicate how it should be changed?		
Name	Response	
	8c	8d
Anthony Davies (resident - Welton)	No	It is even more strange to include Aldi and Waitrose but omit Tesco
Braunston Parish Council	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Daventry Town Council	No	Tesco should be identified as primary shopping area- note Aldi & rear of Aldi has been identified.
Geoff Pullin (Resident- Badby)	Yes	So far but what about proposed expansions?
Mark Wesley (resident - Daventry)	No	I think the New Street part should include the current Tesco site to encompass the current retail offer
Long Buckby Parish Council	Yes	
Staverton Parish Council	Yes	
Tony Dodd (resident - Welton)	Yes	
Welton Parish Council	Yes	
Badby Parish Council	No	It does not include the Tesco supermarket site. Tesco is the largest supermarket in the town.
David George (resident - Kilsby)	yes	
Hollowell and Teeton Parish Council	Yes	
Sport England	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	No	There is an odd bit of secondary shopping frontage to the SW of the District Offices - what is it? 8d The retail (Abey retail?) park with Homebase etc does not seem to be included. It is certainly not 'out of town' and it is as much within walking distance of Waitrose & the Market cross as Sheaf Street + it offers better retail
Anthony Davies (resident - Welton)	No	It is even more strange to include Aldi and Waitrose but not Tesco
David Williams (resident - East Haddon)	Yes	
Moulton Parish Council	Yes	

Weedon Bec Parish Council	No	
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Q8e. Are the Primary and Secondary Frontages shown in figure 3 correct?  
Q8f. If no please indicate how it should be changed?

Name	Response	
	8e	8f
Anthony Davies (resident - Welton)	No	Include Station Close
Braunston Parish Council	Yes	
Daventry Town Council	No	No shopping frontages exist on –New Street, Moor Hall (office) and Plume of feathers (Public House)
Mark Wesley (resident - Daventry)	No	New Street is not correct unless building use has been amended. Not sure of building designation in the town but I cannot see any actual shopping in New street , unless you count Tesco which isn't really part of the street
Long Buckby Parish Council	Yes	
Staverton Parish Council	Yes	
Tony Dodd (resident - Welton)	Yes	
Welton Parish Council	Yes	
Badby Parish Council	Yes	
Hollowell and Teeton Parish Council	yes	
Sport England	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	No	Impossible to answer as you do not define primary and secondary. The Abbey/Homebase retail park is surely more primary than the multitude of town centre cafes and has a better offer
Anthony Davies (resident - Welton)	No	Include Station Close
David Williams (resident - East Haddon)	Yes	
Moulton Parish Council	Yes	

Q8g. To protect the vitality of the town centre, should the Council consider restricting the change of use of shops in Daventry town centre to other uses, by means of an Article 4 direction		
Q8h. Please explain your answer		
Name	Response	
	8g	8h
Braunston Parish Council	Yes	Yes, but we would like to see the plan additionally include more positive and imaginative ways of creating vitality in the town centre, for example greater investment in the public realm; and the facilitation of 'popup' shops on temporary or 'meanwhile' leases in vacant or underused units, especially for small, creative businesses, or for informal learning opportunities.
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	It is necessary ensure the diversity of types of development to provide the necessary amenities for the population of Daventry and surrounding area and to promote the agreed strategy within the WNJCS.
Daventry Town Council	No	The vitality of the town should be driven by demands of community and identified needs. Restrictive policies could create inflexibilities that could be detrimental to Town development.
Geoff Pullin (Resident- Badby)	Yes	Lobby parliament to give powers required - Do the changes suggested for Business Tax to be retained locally provide a way?
Farthingstone Parish Council	Yes	It is necessary to ensure the diversity of types of development to provide the necessary amenities for the population of Daventry and surrounding area and to promote the agreed strategy within the WNJCS.
Tony Dodd (resident - Welton)	Yes	Footfall, on which viability of new stores will be based, would be jeopardised by a failure to use an Article 4 Direction.
Welton Parish Council	Yes	It is necessary to ensure the viability and vitality of the town centre (footfall would be jeopardised without Article 4 Direction).
Badby Parish Council	No	Doing so may lead to the development of out-of-town shopping areas which the Parish Council feels would be detrimental to the town centre amenity. This can be evidenced by such developments in Rugby and Banbury.
David George (resident - Kilsby)	No	It is better to have the buildings in use rather than empty neglected shells
Hollowell and Teeton Parish Council	No	Need to have all options available
Sport England	Yes	
Nikolas Moore (resident - Boughton)	No	
Francis Jackson Homes	No	This should be for the market to decide and to allow suitable competition.
Weedon Bec Parish Council	No	It's too late for that because there are already too many empty units and businesses that start up and then close quickly. This is likely to continue with changes in shopping habits. Amendments to the NPPF are being proposed to allow change of use to mop up empty retail by use for housing, a sensible idea. Older people who may not drive and do not like public transport may welcome QUALITY town centre living; affordable housing for families who cannot afford cars, decent rental for mobile workers, single and young people and students would bring custom to existing shops and cafes in the town centre which are already within walking distance - this would make the town centre more viable (there are good examples in Rugby)
Anthony Davies (resident - Welton)	Yes	To ensure a vibrant centre
David Williams (resident - East Haddon)	No	Too restrictive
Moulton Parish Council	No	Better to change shop use to something else rather than leaving empty.

### Issue 9- Daventry Town Centre- Independent Shops

Q9a. Should a policy be included to try and protect independent shops in Daventry Town Centre? Q9b. If yes, what policy approach could the Local Plan include to protect independent shops that would be effective and accord with planning law and the NPPF?		
Name	Response	
	9a	9b
Braunston Parish Council	Yes	Limiting the scale of new developments would assist
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	The policy cannot and should not conflict with the law. However, there is nothing to prevent the local plan from stating explicitly that in considering applications, the impact on pre-existing independent shops will be a consideration with the aim of preserving a strong and vibrant independent retail and services sector. The law is silent on this point and therefore local plans are entitled to provide a steer. Indeed, from a policy perspective, they should as local planning authorities are best placed to determine local needs
Daventry Town Council	Yes	If a policy is created it should be to encourage independent traders and include financial incentives, lower rates, business schemes.
Geoff Pullin (Resident- Badby)	Yes	See 8H
Guilsborough Parish Council	Yes	More local employment opportunities. Support local character of a market town
Historic England	Yes	Daventry should seek to build on its strengths and ensure that the retention of independent shops within the historic area is encouraged through planning and other measures (affordable rents / business rates etc.) and public realm improvements, where necessary. This will help to retain the character of the town centre and ensure that historic buildings are kept in use and maintained. A policy or criteria to reflect this and the importance of the historic environment to the town centre would be welcomed.
Welton Parish Council	Yes	We are not planning experts only informed amateurs.
Badby Parish Council	Yes	Independent shops can be encouraged by suitable economic measures.
The Theatres Trust	Yes	
David George (resident - Kilsby)	Yes	Ensure that landlords are charging fair rent and the council fair rates. Make landlords keep the property clean and tidy.
Hollowell and Teeton Parish Council	No	
Sport England	Yes	
Nikolas Moore (resident - Boughton)	Yes	Local plan.
Francis Jackson Homes	No	
Weedon Bec Parish Council	No	

Wilbraham Associates Ltd	No	
Anthony Davies (resident - Welton)	No	
David Williams (resident - East Haddon)	Yes	Only approve retail permissions to a specific size say 3000 sq ft for example
Moulton Parish Council	Yes	The Neighbourhood Design

### Issue 10- Daventry Central Area Sites

Q10a. Do you agree with the proposed designations/allocations above? Please explain your answer below			
Q10b. Should the plan allocate further sites to those indicated above? If so please indicate which site and the proposed use by using a call for sites form.			
Name	Response		
	10a	Explanation	10b
Anglian Water		At this stage the quantum of retail, educational and town centre uses is not specified for the proposed sites identified in the Town Centre Vision 2004. We would wish to comment further on the implications of these sites on Anglian Water's existing infrastructure when the scale of development is identified by the District Council.	
Anthony Davies (resident - Welton)	No	In order to limit urban sprawl could there be an invitation to include housing in Sites 2,5 and 6	
Braunston Parish Council	Yes and No	We would like the Local Plan to continue to promote a new library and cinema on Site 1 and for it to be advanced as a cultural quarter. We oppose the proposal to develop a canal arm and boat lift at Site 3 and propose the land is used to develop much needed affordable housing, and a new town park.	No
Church with Chapel Brampton Parish Council			No
Daventry Town Council		Mixing new with old – preferable to have an area of all new retail retaining old market town for independent traders and encouraging footfall to 'historic market town'	No
Geoff Pullin (Resident- Badby)	No	They look generally sensible. Why is Vicar Lane not shown as an area? Far future development may need another access from the ring road into the town centre through this area.	Yes
Historic England		In relation to all sites, the context of issue 10 is an exciting opportunity to regenerate the town centre. Rather than relying on previous permissions, which may not be implemented in any case and may not necessarily be the most advantageous way forward; this is an opportunity to create a fresh, coherent strategy for the town centre without constraining future development to the restrictions of previous permission. Site 1 North of High Street -Comments submitted in relation to previous applications at the site should be taken into account. Future well designed retail development could conserve and enhance the historic environment. Site 2 Land around Bowen Square -There are four grade II* listed buildings adjacent to/within the site, together with a range of other heritage assets. As with all sites, reference to the historic environment should be included within allocation supporting text. Site 3 Land off Eastern Way -The site is partly within Daventry Reservoir Conservation Area and the site is close to the historic core of Daventry Town Centre. Again, this sites represents an important opportunity in relation to heritage assets.	
Kilsby NDP Steering Group for	Yes		No

Kilsby Parish Council			
Mark Wesley (resident - Daventry)	Yes		No
Long Buckby Parish Council	Yes	They appear logical and sufficient.	No
Northamptonshire Police	Yes		
Staverton Parish Council	No	Site 3, no water space required, money can be better spent.	No
Tony Dodd (resident - Welton)	Yes	The provision of housing and educational facilities is very important to the ongoing vitality of the town centre.	No
Welton Parish Council	Yes	The sites collectively would meet local housing needs more effectively and assist the town's growth and regeneration.  The inclusion of housing and educational facilities is highly beneficial.  The proposed canal arm remains problematic for many local people judging from responses in the Daventry Express and elsewhere. Its economic viability at a time of serious financial constraints is a frequent criticism.	
The Theatres Trust	Yes	Yes	
David George (resident - Kilsby)	Yes	The proposed sites and usage should enhance and improve the Town	No
Hollowell and Teeton Parish Council	Yes	Provides indication of Planning preferences	No
Nikolas Moore (resident - Boughton)	Yes	Agree with policy.	
Francis Jackson Homes	No	This Vision is from 2004 and so is over 10 years old - the evidential basis needs updating if this is to develop into meaning current planning policy with up to date research to support the policy formulation.	No
Weedon Bec Parish Council	No	Site 1 - see answer to 8g previous Site 2 - aren't town centre bus stations a bit old fashioned? There needs to be town centre interchanges and local interchanges but a single big bus station always becomes an eyesore. Connectivity is needed not buildings. Site 3 Views are polarised on this some thinking it's a good investment which would enhance the locality, bring some character to an otherwise drab field, encourage visitors and quality housing others dislike the whole idea. Site 4 - as few specifications as possible or the whole thing will become too rigid. Site 5 - what is bulky goods retail?? Ikea? yes please Site 6 - why town centre? A special school must have good public transport links, plenty of parking and play space but does not need to be town centre where land is presumably more expensive. It seems a bit premature to prescribe uses or these sites when the existing town centre developments are under used e.g. the Icon, existing shops	
Anthony Davies (resident - Welton)	No	In order to limit urban sprawl and develop a vibrant centre could there be an invitation to include housing in Sites 2,5 and 6?	
David Williams (resident - East Haddon)	Yes	5	No

#### Issue 11- Daventry Town Centre- Out of Town Retail

Q11a. Given the existing policy S9 of the WNJCS it is not considered necessary for this Local Plan to include an additional policy on out of town retail. Do you agree?		
Q11b. If no please specify why.		
Name	Response	
	11a	11b
Anthony Davies (resident - Welton)	Yes	
Braunston Parish Council	Yes	

Brixworth Neighbourhood Plan Steering Group	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Daventry Town Council	No	Due to restricted land availability in the town centre, Daventry has to look at out of town retail – as per Rugby and Banbury models
Badby Parish Council	No	There needs to be a focus on the town centre so as not to dilute the amenity it already provides. Shops need to be in reach of bus users. It is considered that Daventry is currently quite compact which is seen as a positive.
The Theatres Trust	Yes	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	No	So called 'out of town' retail is here to stay and becomes less out of town as the town expands. The days of the weekly shop 'in town' are over and Daventry certainly has nothing to attract a 'weekend' shopper who wants a pleasant experience. Out of town centre now provide for daily needs with discounters like Aldi & Lidl being conveniently situated for daily needs (or M&S Simply Food for the more up market. - somewhere where people can drop in on their way home to pick up a meal to supplement the online shop. Out of town retail needs to be more pedestrian friendly so that people can walk from one big unit to another. Private ownership of retail parks often prevents this but planners could and should insist on it.
Wilbraham Associates Ltd	Yes	
Anthony Davies (resident - Welton)	Yes	
David Williams (resident - East Haddon)	No	This would impinge on small independent shops

#### Issue 12- Daventry Central Area

Q12a. Is there anything else that the Local Plan needs to cover regarding the Central Area? Q12b. If yes please specify		
Name	Response	
	12a	12b
Anthony Davies (resident - Welton)	No	
Braunston Parish Council	Yes	Outdoor retail space, e.g. farmers' market and street stalls. Adequate free car parking to support the expansion of retail facilities.
Brixworth Neighbourhood Plan Steering Group	No	

Church with Chapel Brampton Parish Council	No	
Daventry Town Council	Yes	The vision needs to be reviewed and updated. A canal is not necessarily the right option to regenerate Daventry Town. The Local Plan needs to be flexible and not restricted by Policy D1.
Welton Parish Council	Yes	The value of streets and farmers markets.  Deliveries re site 1 need to be given serious consideration.  Traffic management (including parking) as the centre is bound to attract more visitors.
Badby Parish Council	No	
The Theatres Trust	Yes	
David George (resident - Kilsby)	No	
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Francis Jackson Homes	No	
Weedon Bec Parish Council	Yes	The Tesco store does not make the best use of its large site and car park. Its goods entrance is a danger to pedestrians and does repeated damage to the pavements. Suggest move it to Site 5 and use the land it vacates for community space/buildings and housing or a more considerate retailer who might built flats above the shop (e.g. Sainsburys MK - a very sustainable and socially conscious development)
Wilbraham Associates Ltd	No	
Anthony Davies (resident - Welton)	No	
David Williams (resident - East Haddon)	No	

### Issue 13 – Daventry Town Housing

<p>Q13a. What spatial approach is considered to be appropriate for the delivery of at least 511 dwellings to meet the needs of Daventry Town? (tick one or more options)</p> <p>Option A- Expansion South East  Option B- Expansion to the North  Option C- Expansion to the South/South West  Option D- Consolidate on existing sites and within the town  Option E – Alternative approach not listed above</p> <p>Q13b. If you selected Option E, please explain your alternative approach.</p>		
Name	Response	
	13a	13b
Anglian Water		Anglian Water has no preference relating to the potential spatial options for housing to meet the needs of Daventry. However there is a need to consider further the implications of further growth at Daventry for water supply network, the foul sewerage network and sewage treatment.

Landform, Micklewell Park (Barton Willmore)	Option B	Landform consider that Option B outlined in Figure 5 on page 33 is the most appropriate approach in terms of sustainability and containment within the existing landscape setting. Notwithstanding, and given the requirement for housing within Daventry, there is merit in considering all three options for growth if the Council is to ensure a healthy supply of deliverable housing sites over the next plan period.
Anthony Davies (resident - Welton)	Option E	There has surely been sufficient expansion to the north. First priority should be given to a more creative approach to town centre development - 3,4 or even 5 story houses allow for more families on a smaller footprint e.g. Site 3 could have buildings similar to some at Middlemore.
Braunston Parish Council	Option A, D and E	Expansion to the North appears likely to conflict with Braunston's Neighbourhood Plan Policy G (area of separation). Landscape to the South and South/West is of similar value and characteristics, and we believe an area of separation there is also important. Enabling the development of affordable homes on Site 3 would help meet the housing needs of Daventry Town.
Church with Chapel Brampton Parish Council	Option B and D	
CPRE	Option D and E	Option D should feature prominently with an emphasis on building on brown field sites. No preference regarding the other options for taking up the remaining requirement
Gladman- various sites		Gladman believe that there is no need to apply a settlement boundary policy (defined either on a map or in the text) as development on the edge of Daventry should be judged on the basis of whether or not it is sustainable in terms of the criteria set out in the Framework. Creating a hard-and-fast settlement boundary in effect creates a 'presumption against development' in areas adjacent to Daventry but outside the boundary;  Gladman recommend that this policy needs to be significantly revised to provide a more permissive approach to development. We suggest the following rewording to this element of the policy: "Development in the Open Countryside adjacent to existing settlements will be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development."
Daventry Town Council	Option B	
Geoff Pullin (Resident- Badby)	Option A, B and D	Is the pink bit already allocated for development? I thought it had been rejected at appeal, or was that just the particular scheme?
Guilsborough Parish Council	Option E	A mix of the above with the size of any SUE best reflecting the need to provide local services to the new housing.
Highways England		Highways England acknowledges 'Issue 13: Daventry Town Housing' which considers the spatial approach for the delivery of at least 511 dwellings to meet the needs of Daventry Town. Five different options are listed, including expansion to the south east, expansion to the north, expansion to the south/south west, consolidation on existing sites and within the Town and an alternative approach. It is considered that a Transport Assessment would be required to determine the impacts of the selected site on the strategic road network, for whichever option is taken forward. In addition, Highways England considers that for whichever option is taken forward, the cumulative impacts on the operation of the strategic road network from the site, combined with the proposed Daventry North East Sustainable Urban Extension for 4,000 dwellings, should be considered.
Historic England		In relation to specific directions of growth, it is not our intention to fully detail all the potential impacts on the historic environment at this time; however we reserve the right to make further representations to any subsequent proposals that might adversely affect nationally designated sites, including their setting. The comments made in this letter should be taken into consideration when preparing the next iteration of this document.  We are concerned that this is no reference to heritage assets within the options A to E or that Sustainability Appraisal site assessments have not been carried out. It is considered that substantial further work is required in relation to heritage assets in order to determine the suitability of any proposed sites or directions of growth. Further assessment will be required in relation to heritage assets for all potential areas of development. Options A-C shown on Figure 5 all have the potential to impact upon heritage assets; detailed further assessment would be required before an assessment can be made. For example there are Listed Buildings and scheduled monuments close to Option A and C together with historic villages, including Conservation Areas and other heritage assets further to the south. Further detail is required in relation to the scale of development; any development surrounding Daventry would require careful consideration in order to protect the character of the historic core, landscape and villages.
Home Builders Federation	Option A, B, C and D	When allocating sites to meet the residual housing requirement of 511 dwellings the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some sustainable urban extensions (SUEs) may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else been equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets

		but because the widest possible range of products and locations are available to meet the widest possible range of demand.
Mr DJS & Mrs SE Wilson (residents – Badby)	Option E	<p>We oppose Options A and C for the following reasons:</p> <p><b>Option A</b> Borough Hill is the most distinctive physical and historic feature of the town. Its prominent mass forms the natural boundary to the town on the East.</p> <p>Residential development extending along the A45 to the south and east of Borough Hill would be visually severed from the town, physically isolated from the town centre due to restricted access, and would tend to be inward looking and incapable of integration. If permitted and in the absence of any other clear barrier to the east, it would subsequently become difficult to resist further expansion towards Weedon and the M1.</p> <p><b>Option C</b> Newnham Hill, Fox Hill and Big Hill form the natural physical boundary of Daventry town to the South.</p> <p>From many viewpoints, the unspoilt slopes and distinctive skyline of these hills form a scenically attractive rural backdrop to the town. At the same time, they provide a vital buffer which visually screens the urban area together with its noise and light pollution from the wider countryside to the South. This lends a real sense of rural remoteness to the Special Landscape Area of the Upper Nene Valley and beyond which in turn contributes to a much valued perception of peace and tranquillity despite the proximity of the town.</p> <p>Expansion to the south and southwest would radically harm the landscape setting of the town and encroach upon the unspoilt rural areas to the south. Additionally there is the constraint of the geologically unstable slopes to the south of the ring road as confirmed in the Daventry Strategic Development Options Study April 2005</p> <p>In view of the above, we consider the best approach to meet the housing needs of Daventry is to prioritise Option D ie. Consolidate on existing sites and within the Town, and then only as a last resort to pursue Option B in allowing further development to the North. Despite the further loss of farmland, this area has the advantage of potentially easier access to the anticipated growth in employment associated with the development of DIRFT Phase 3.</p>
Tony Dodd (resident - Welton)	Options A, C & D	
Welton Parish Council	Options A, C & D	
Badby Parish Council	Option E	The Parish Council sees the current Daventry ring road as a natural boundary to any development to the South/South West of the town and would be against Option C. The Parish Council sees development in an easterly direction as more acceptable - along the base of the valley and so providing less visually intrusive development. It is surprising that the area coloured pink to the North east of the town has not developed at the expected rate and this should be a cause for concern.
The Theatres Trust	Option D	
David George (resident - Kilsby)	Option A	
Hollowell and Teeton Parish Council	Option A	
Nikolas Moore (resident - Boughton)	Option B	
Francis Jackson Homes	Option C	
Weedon Bec Parish Council	Option B, C & E	
David Williams (resident - East Haddon)	Option E	More low cost housing in the villages to save them becoming retirement villages

Savills (Christ Church, Oxford)	Option B	<p>Figure 5 of the I&amp;OCP provides an indicative map showing possible spatial housing options for the growth of Daventry Town. It is noted that Option B includes various land parcels which are under the ownership of Christ Church, Oxford. <b>Issue 13 (Daventry Town Housing)</b> reports a need to deliver an additional quantum of residential development, of circa 500 dwellings, beyond sites which benefit from existing planning consent or allocation within the West Northamptonshire Joint Core Strategy (WNJCS).</p> <p>Christ Church’s land to the west of the A461, sits to the north of the Daventry. The Daventry District Local Plan (June 1997) allocated significant land for residential development to the north of the town via Policies HS4A (Ashby Fields / Lang Farm) and HS4B (Middlemore). Such developments are largely complete and therefore extend the built limits of the town to the College’s ownership. Application DA2014/0869 secured outline planning consent to the east of the A461, which lies opposite Christ Church’s interest, again extending the northern built limits of the town.</p> <p>Daventry is clearly recognised as a sustainable development location with the northern part of the town having delivered strategic growth in recent years. The delivery of the Daventry North East Sustainable Urban Extension (SUE) will provide further housing growth. The I&amp;OCP reports a potential lower delivery rate at the SUE than anticipated through the WNJCS and a resulting residual requirement for delivery of circa 500 dwellings. For this reason, Christ Church endorses <b>Option B (Expansion to the North)</b> to provide for additional housing growth of circa 500 dwellings at Daventry and flexibility to delivery for the Local Plan. The College’s land ownership is confirmed as available for development.</p> <p>The identified site has been subject to previous assessment through the WNJCS Sustainability Appraisal Addendum (December 2013). Prepared by LUC, this document reported parcel DJ0_06 as one of three sites considered to be of medium sensitivity in respect of landscape and townscape impact. Seventeen of the Daventry site options were reported in the medium to high or high landscape sensitivity areas.</p> <p>The enclosed Illustrative Residential Framework plan reports a potential capacity of circa 500 to 650 dwellings across a site area of circa 49.3 ha. As well as providing an initial capacity assessment, the enclosed Illustrative Strategic Framework seeks to demonstrate the potential wider benefits that development at this location could deliver, for instance:</p> <ul style="list-style-type: none"> <li>• Proximity of site to significant employment opportunities situated to the west of Daventry Town;</li> <li>• Access to Grand Union Canal Conservation Area;</li> <li>• Improved connection to Public Right of Way network and inter-connection of public open space network;</li> </ul> <p>Accompanying this submission is a duly completed response to the Call for Sites.</p> <p>In turn, the identification of a defined settlement boundary will assist in providing protection to the ‘Fringe of Daventry’. In response to <b>Issue 13 (Northampton and Daventry Fringe)</b>, it is noted that Policy EN11 of the Daventry District Local Plan (1997) had designated land north west of Daventry as a ‘Rural Access Area’. This policy designation sought to provide a predominantly open / green nature and character and increase public access to rural areas. The College recognises the Public Rights of Way in the vicinity of the site identified, in addition the Grand Union Canal Conservation Area. It is considered that development at this location can assist in meeting the housing needs of the District whilst providing long-term safeguarded public access to open space, rural areas and the Grand Union Canal in the vicinity of the site. The enclosed Illustrative Framework demonstrates how this might be achieved’ having considered the ambitions of the Daventry Masterplan 2040.</p>
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**Issue 14 – Management of development on the edge of Daventry**

<p>Q14a. What is the appropriate approach to manage the edge of Daventry Town? (tick one option only)</p> <p>Option A- Defining a Settlement Boundary on a map</p> <p>Option B- Settlement boundary defined by descriptive text only not mapped</p> <p>Option C- Alternative approach</p> <p>Q14b. If you selected option C, please explain your alternative approach</p>		
Name	Response	
	14a	14b

Anthony Davies (resident - Welton)	Option A	
Braunston Parish Council	Option A	
Church with Chapel Brampton Parish Council	Option A	
CPRE	Option A	NOTE Failure to make a clear boundary would lead to disputes and variations in interpretation, possibly leading to legal challenges and associated costs. It would also be consistent with the suggested approach provided in Neighbourhood Plans and Village Design Statements.
Daventry Town Council	Option C	Identified planning needs should define the Town's boundary
Geoff Pullin (Resident- Badby)	Option A and C	Needs provision of A361 North of Middlemoor to SW (Browns Lane) ring road to act as outer town boundary and provide access to new warehousing from the north and west and to take traffic from the east out of the Cummins / residential dog leg and to by-pass the inadequate A361 road / cycle way /path at the foot of Drayton reservoir.  Planning by design, not by who wants to sell their land at a particular time! There needs to be sufficient power for planners to be able to assemble suitably shaped plots, not just medieval field patterns and to provide funding for the new roads and services to those areas in good time. Lobby for planning gain to be better handled for the community long term rather than just for an individual's current wishes.
Home Builders Federation		However it is also suggested that proposed settlement boundaries should not be drawn too tightly thereby inhibiting flexibility for alternative sustainable developments coming forward if any unforeseen problems occur with existing consents and / or strategic site allocations as the Council has experienced at the North East Daventry SUE.
Kilsby NDP Steering Group for Kilsby Parish Council	Option A	
Daventry Marches Limited (Nathaniel Lichfield & Partners)		The settlement boundary (limits) for Daventry Town should be identified by reference to the boundary of the existing urban area and defined allocations to accommodate the growth of the Town for the Plan period. This approach is only appropriate in the eventuality that land at Daventry South East is allocated for the development as suggested above. This approach will provide certainty to the development industry in respect of the Council's ambitions for growth and to local people as to the shape of the settlement in the future.
Mark Wesley (resident - Daventry)	Option A	
Persimmon Homes	Option C	An alternative approach will be to assess each site on their merit. If housing land supply for Daventry falls below five, then it may be possible for the district to accommodate a greater amount of housing numbers adjacent to the urban area, thus the district will be planning positively, as well as being flexible in their approach.
Long Buckby Parish Council	Option A	
Northamptonshire Police	Option A	
Staverton Parish Council	Option A	
Farthingstone Parish Council	Option A	Our answer is Option A but our reasoning is important. Failure to make a clear boundary would lead to disputes and variations in interpretation, possibly leading to legal challenges and associated costs. It would also be consistent with the approach provided in Neighbourhood Plans and Village Design Statements.
Althorpe Estates (Lucas Land Planning)	Option C	Either Daventry Town development should be developed at a greater density or it is time to look at other sustainable district development options not necessarily in locations abutting Daventry Town.
Mr DJS & Mrs SE Wilson (residents – Badby)	Option A	
Tony Dodd (resident - Welton)	Option A	
Welton Parish Council	Option A	

Badby Parish Council	Option C	A ring road would create a natural boundary.
The Theatres Trust	Option A	
David George (resident - Kilsby)	Option A	
Hollowell and Teeton Parish Council	Option A	
Nikolas Moore (resident - Boughton)	Option A	
Francis Jackson Homes	Option B	
Weedon Bec Parish Council	Option B	Option E build more in the town centre instead of retail, see answer to Q8h previous. Brownfield land should be the first option. Why not reuse the empty hotel which is such an eyesore on the A45 roundabout? Walkable and on a good bus service to the town centre or Northampton. Option A would not be good as it is cut off from the main town, has no local services/school and because of the need to preserve the integrity of Borough Hill & Burntwalls.
Anthony Davies (resident - Welton)	Option A	
David Williams (resident - East Haddon)	Option A	
Savills (Christ Church, Oxford)	Option A	The College supports Option A and that a defined settlement boundary is communicated via map form. This boundary should take account of additional allocations to be made through the Settlements and Countryside Local Plan (Part 2a) document.

### Issue 15- Specialist Accommodation

<p>Q15a. How should the plan seek to deliver specialist accommodation?  Option A- allocate land to deliver specialist accommodation in areas with an identified need  Option B – Set a development threshold which requires an element of specialist housing provision on large scale residential development schemes  Option C – Negotiate delivery on a site by site basis (based on identified need) with no set development thresholds or requirements  Option D- combination of the approaches stated above  Option E- another approach not covered by the above</p> <p>Q15b. If you selected Option D, please state in what way they should be combined</p> <p>Q15c. If you selected Option E, please state what this would be.</p>		
Name	Response	
	15a	15b or 15 c
Anthony Davies (resident - Welton)	Option D	Whichever method it is critical that great care is given to social inclusion and access to appropriate facilities - we don't want to develop ghettos
Braunston Parish Council	Option A	
Church with Chapel Brampton Parish Council	Option C	
CPRE	Option D	Option C would be the preferred route, but sometimes identified need will build up in a cumulative way, such that a particular development may not have sufficient identified need when there is still a wider need. In such circumstances, a variation on Option A would need to be applied.
Gladman- various sites	Option C	Gladman support Option C - Negotiate delivery on a site by site basis (based on identified need) with no set development thresholds or requirements. This provides the required flexibility to take into account matters of viability on a site-by-site basis when discussing the provision of specialist accommodation. This flexibility is important because not all sites will necessarily be suitably located to accommodate certain types of specialist accommodation; basing the requirement solely on thresholds such as

		the size of the development could lead to specialist housing being unsuitably located and so a one-size-fits-all approach is not appropriate.
Daventry Town Council	Option A	
Framptons	Option C	
Geoff Pullin (Resident- Badby)	Option C	
Great Oxendon Parish Council	Option A	
Guilsborough Parish Council	Option E	Option A and B
Home Builders Federation		Thresholds for the provision of specialist housing and a requirement for the higher optional standard of M4(2) adaptable / accessible homes of the Building Regulations. As set out in the NPPG (ID 56-007 and ID 56-003) this policy requirement should be justified based on need and viability tested ;
Kilsby NDP Steering Group for Kilsby Parish Council	Option B	
Messrs Jackson (Landmark Planning)	Option D	The provision of small sites for specialist accommodation which meets the definition of sustainable development (option A) together with the provision of a set element of specialist housing within large scale residential development (option B) would be the most effective approach. Option C offers no certainty for developers and/or landowners and would give to viability challenges.
Mark Wesley (resident - Daventry)	Option A & B	
Mulberry Property Developments (Pegasus Group)	Option D	<p>Sufficient flexibility should be contained within the Local Plan Part 2a in order to ensure that the specialist accommodation requirements of the District's residents can be delivered over the Plan period. In some cases, particularly in response to identified need, either specific allocations or a site threshold may be appropriate. The latter is considered more appropriate in urban areas where the scales of development are higher and better able to accommodate such provision without undermining the viability of development schemes. An up-to-date evidence base is an essential pre-requisite and in the majority of cases, particularly in rural areas, negotiation on a site by site basis would be more appropriate.</p> <p>Paragraph 50 of the NPPF only requires specific policies where affordable housing need is identified but it is understood that the Local Plan plays a critical role in ensuring that the District plans positively to meet accommodation needs by delivering a wide choice of quality homes, based on a mix of housing to address the needs of different groups in the community.</p> <p>The provision of specialist accommodation, as a component of market housing-led development must be considered in the context of ensuring viability and deliverability. Paragraph 173 of the NPPF is clear that plans should be deliverable and to ensure this, sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Therefore, and with specific reference to the District's rural areas, site by site negotiations, set within the context of paragraph 173 of the NPPF is considered to be the most appropriate format upon which specialist housing can be delivered, whilst ensuring that sites remain viable and deliverable.</p>
Naseby Parish Council	Option D	Some specialist housing requires specific requirements, flat topography, transport and shops close by so even some large sites will not be suitable. Combination of Options C and A.
Persimmon Homes	Option A	This would be the most logical approach to take, as the location of the need will dictate where allocations for specialist accommodation will be made. However, a development threshold should not be set requiring specialist housing to be located on large scale residential schemes. If this is the case, scheme viability and delivery will be risked considerably. Evidence of specialist accommodation need should be provided in order for any allocations to be made.
Long Buckby Parish Council	Option A	
Northamptonshire Police	Option B	
Staverton Parish Council	Option B	

Althorpe Estates (Lucas Land Planning)	Option D	We have identified two aspects: Firstly housing need information is fundamental: this can be obtained from a variety of sources, it is not a 'top-down' imposed approach and can be obtained from external agencies. It is worth remembering that many specialist housing developers and in this case the Estate have excellent local knowledge of housing needs. Developers will not build where there is no need and the local authority should be aware of the contribution of the private sector and the knowledge in that sector of this aspect of the housing market.  Secondly, specialist housing should not purely be confined to urban areas-rural areas have specialist housing needs and the rural retired are a significant and growing population-their housing needs are just as important as those in urban areas: there must be recognition of this. It is no good insisting that provision will only be made on large estates or in towns as that does not take account of the specific needs of the rural retired-many of whom will not move to towns.
Mr DJS & Mrs SE Wilson (residents – Badby)	Option A	
Tony Dodd (resident - Welton)	Options A & B	
Welton Parish Council	Options A & B	
Badby Parish Council	Option E	There is no option for covering the rural areas.
The Theatres Trust	Option A	
David George (resident - Kilsby)	Option C	
Hollowell and Teeton Parish Council	Option B	
Nikolas Moore (resident - Boughton)	Option B	
Francis Jackson Homes	Option A	
Weedon Bec Parish Council	Option E	We would like to answer D & E. Specialist accommodation must be fully integrated into ordinary housing developments and indistinguishable from them; groups of OAP bungalows are a security risk. Option E build more 'lifetime' hosing instead of putting people into special need boxes
Anthony Davies (resident - Welton)	Option D	Whichever method it is critical that great care is given to social inclusion and access to appropriate facilities - we don't want to develop ghettos
David Williams (resident - East Haddon)	Option C	

Q15d. Do you agree with the criteria on page 39 of the Issues and Options consultation document for the location of specialist accommodation? Q15e. Are there any other factors that should be taken into consideration?		
Name	Response	
	15d	15e
Anthony Davies (resident - Welton)	No	We can't rely on bus services so the second criteria must specify necessary transport arrangements
Braunston Parish Council	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	Criterion B should provide for a shorter journey time than 30 minutes where possible.

Daventry Town Council	Yes	Depends on identified need
Framptons	No	The provision of specialist accommodation should not be confined to the urban area of Daventry. The provision of at least half hourly bus services in the rural area of the District is very limited. This provision is too prescriptive and should be a desire by the Council rather than a requirement. Bringing forward developments on a site by site basis is the best option for consideration. Other options to travel are widely available, for example the provision of a private minibus for residents. This has not been taken into account. This applies to the requirement for access to facilities, there are other options that could be implemented that would not preclude a resident from access to such facilities.
Geoff Pullin (Resident- Badby)	Yes	
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	Yes	
Kilsby NDP Steering Group for Kilsby Parish Council	Yes	
Messrs Jackson (Landmark Planning)	Yes	
Mark Wesley (resident - Daventry)	Yes	
Mulberry Property Developments (Pegasus Group)	Yes	
Naseby Parish Council	Yes	
Persimmon Homes	Yes	
Long Buckby Parish Council	Yes	No
Northamptonshire Police	No	No mention of places of worship.
Althorpe Estates (Lucas Land Planning)	Yes	Whilst we agree, the list is not exhaustive and should not preclude other locations coming forward, particularly rural locations-suppliers of specialist accommodation need to be listened to-they have an intimate knowledge of their market.
Tony Dodd (resident - Welton)	Yes	With the cuts proposed to transport subsidies and adopted by the County Council, bus services are under threat so ALL development must be within sensible walking of the town centre. Any such development beyond Lang Farm is too far from the town centre for specialist accommodation.
Welton Parish Council	Yes	'Reasonable' walking distance is too open to interpretation.  Can the bus service be delivered across various sites?
Badby Parish Council	No	The Parish Council feels unqualified to answer this question.
Environment Agency	No	
The Theatres Trust	Yes	

David George (resident - Kilsby)	Yes	No
Hollowell and Teeton Parish Council	Yes	No
Nikolas Moore (resident - Boughton)	Yes	
Francis Jackson Homes	Yes	No
Weedon Bec Parish Council	Yes	Public transport links to train stations with a good service e.g. Northampton and MK not Long Buckby so people can get out an about easily and safely; there's not a lot or older people in Daventry e.g. theatre, cinema.
Anthony Davies (resident - Welton)	No	We can't rely on bus services being available so the second criteria needs to specify transport arrangements needed for the site
David Williams (resident - East Haddon)	No	specialist housing in Villages

#### Issue 16- Existing Employment Areas

Q16a. The employment areas for Daventry Town are mapped in Appendix C. Are these defined correctly? Q16b. If no please indicate how they should be changed.		
Name	Response	
	16a	16b
Anthony Davies (resident - Welton)	Yes	
Braunston Parish Council	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Daventry Town Council	No	The employment area for the Town Centre has not been included (iCon)
Geoff Pullin (Resident- Badby)		Probably. The map highlights how employment areas are drifting away from residential areas thus increasing traffic rather than bike and walking access between the two. As many businesses increasingly require shift working it is important to integrate suitable housing with industry
Historic England		We have previous supported the up-grading of existing employment areas particularly the area around the Burnt Walls scheduled monument. The type of development should be limited in this location in order to enhance its setting, e.g. B1 and B2 uses rather than B8. In addition, opportunities should be identified in the context of the development of the green infrastructure framework for the town, to enhance setting and promote public access to and interpretation of the scheduled sites.
The Theatres Trust	Yes	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	

Nikolas Moore (resident - Boughton)	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council		Not familiar enough to have an opinion
Anthony Davies (resident - Welton)	yes	
David Williams (resident - East Haddon)	Yes	
Savills (Christ Church, Oxford)		<p>The College's land holding at Drayton Gate Farm abuts the Apex Park site and therefore represents a 'next stage' of potential employment delivery. For this reason, the College identifies this parcel through the enclosed Call for Sites response and confirms the land is available for development. Allocation of this site would require amendment in respect of Appendix C and therefore any extensions to existing employment areas should be identified through appropriate amendment (<b>Issue 16 Existing Employment Areas</b>).</p> <p>The enclosed Illustrative Employment Framework demonstrates how employment development could be delivered at this location. In addition, owing to the extent of the College's ownership, there is potential to provide for a future vehicular route around the north-west section of the town, in connection with the residential element of development also proposed by this submission.</p>

#### Issue 17 – Change of Use on Employment Areas- viability

Q17a. It is proposed that a policy is included that requires independent marketing evidence for a period of at least 12 months to demonstrate that sites are no longer viable. Do you agree? Q17b. If no please specify why.		
Name	Response	
	17a	17b
Anthony Davies (resident - Welton)	Yes	
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Daventry Town Council	Yes	
Framptons	No	Compliance with paragraph 22 of the NPPF is required.
Geoff Pullin (Resident- Badby)		The Government has caused a chaos by extending permitted rights. Q17a Sounds like the requirement before change use of pub sites -probably a suitable idea. I presume this is like the changes of use in Royal Oak which changes units to public attendance businesses rather than storage / manufacture.

Guilsborough Parish Council	No	More flexibility to allow higher density close to the town centre, with employment areas being relocated elsewhere.
Welton Parish Council	Yes	
Badby Parish Council	No	The Parish Council is not suitably knowledgeable to answer this question.
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	No	12 months might not be long enough in a weak market and isn't a high enough bar to prevent speculative applications for change of use.
Francis Jackson Homes	No	This is only part of a suitable planning justification for alternative uses which must be more flexible and encompassing - i.e. planning history considerations, market assessments, review of other land for sale/rent at the time an alternative land use is proposed, etc. This is too basic, inflexible and prescriptive.
Weedon Bec Parish Council	No	12 months is too long - if a site is viable there will be interest/negotiations within 6 months after that it should be open to alternative uses, especially housing to reduce the need for the town to expand on to greenfield land. Something also needs to be done to reduce the underuse of employment sites e.g. VOSA at Weedon which we are told is still in use but seems rarely used. Such sites become an eyesore and make an area look economically depressed.
Anthony Davies (resident - Welton)	yes	
David Williams (resident - East Haddon)	No	6 months should be enough.

### Issue 18 – Employment Areas

Q18a. Are there any further sites that should be considered for additional employment allocations at Daventry Town?			
Q18b. Are there any employment sites that should be considered for alternative (non "B" class) uses?			
Q18c. If yes please specify			
Name	Response		
	18a	18b	18c If yes please specify
Braunston Parish Council	No	No	
Church with Chapel Brampton Parish Council	No	No	
CPRE	No	No	
Daventry Town Council	No	No	
Mark Wesley (resident - Daventry)	No	No	

Long Buckby Parish Council	No	No	
Staverton Parish Council	No	No	
Althorpe Estates (Lucas Land Planning)	Yes		There is the Daventry Town approach only which does not look at the wider rural area and the need to enhance rural areas and rural employment.  In addition the M1 corridor is a fundamental transport link - consideration needs to be given for continuing and emergent employment provision along this route and the Daventry Development Link.
Tony Dodd (resident - Welton)	No		Not qualified to comment on this.
B & L Whitfield and Sons and Prologis UK Ltd			This representation specifically relates to the need for additional employment sites specifically for non-strategic B2 and B8 development to be identified to support the growth and expansion of Daventry as expressed in the vision for Daventry. We believe this is a requirement if the vision is to be realised. Changing Government policy on permitted development rights and the re-evaluation of housing delivery from the major SUE at Daventry leading to a requirement to identify further housing sites requires that additional employment sites must also be sought to maintain a homes to jobs balance and help to reduce unsustainable out-commuting.  Our client's site at Nasmyth Road provides an ideal site for the contained extension of the Apex Business Park to provide for non-strategic B2 and B8 employment development and to provide jobs growth to support planned housing growth and should be identified as an allocated site in the Part 2a Local Plan.
Welton Parish Council	No		
Badby Parish Council	No	No	
David George (resident - Kilsby)	No	No	
Hollowell and Teeton Parish Council	No	No	
Nikolas Moore (resident - Boughton)	No	No	
Francis Jackson Homes	No	Yes	Potentially any - subject to assessment.
Weedon Bec Parish Council	No	No	
Anthony Davies (resident - Welton)	Yes	No	
David Williams (resident - East Haddon)	No	Yes	Small areas in the villages
The Theatres Trust	Yes	Yes	

Savills (Christ Church, Oxford)			<p><b>Issue 18 (Employment Areas)</b> requests whether any further sites should be considered for additional employment allocations at Daventry town. Appendix C of the I&amp;OCP identifies the extent of the existing employment area titled Daventry Heartlands, Drayton Fields and Royal Oak. The north-western parcel of this allocation identifies the Prologis Apex Park site which now benefits from detailed planning consent. The western extent of Daventry Town provides significant employment uses and represents a logical location for further employment provision for the town.</p> <p>The College's land holding at Drayton Gate Farm abuts the Apex Park site and therefore represents a 'next stage' of potential employment delivery. For this reason, the College identifies this parcel through the enclosed Call for Sites response and confirms the land is available for development. Allocation of this site would require amendment in respect of Appendix C and therefore any extensions to existing employment areas should be identified through appropriate amendment (<b>Issue 16 Existing Employment Areas</b>).</p> <p>The enclosed Illustrative Employment Framework demonstrates how employment development could be delivered at this location. In addition, owing to the extent of the College's ownership, there is potential to provide for a future vehicular route around the north-west section of the town, in connection with the residential element of development also proposed by this submission.</p>
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Q18d. Is there a case for introducing Article 4 directions to remove permitted development rights for the change of use from employment ("B" class and other job-generating activities) to residential without the need for planning permission? Please explain your answer below.

Name	Response	
	18d	Explanation
Anthony Davies (resident - Welton))	Yes	Employment opportunities are very important particularly in rural areas
Braunston Parish Council	Yes	On balance, we agree, because once lost, employment spaces are hard to replace, and their economic value hard to regain.
Church with Chapel Brampton Parish Council	No	
CPRE	Yes	Without the requirement to obtain planning permission, developments could be modified etc without any consideration for strategic need. Therefore, planning permission is essential.
Daventry Town Council	Yes	Risk that existing significant commercial areas (High Street, Daventry) could become solely residential.
Geoff Pullin (Resident- Badby)		I don't know, but probably some suitable permitted right will look silly in the future. The government policy on permitted changes needs modifying to local decision not making permanent.
Mark Wesley (resident - Daventry)	Yes	The centre has to be a business area.
Naseby Parish Council	Yes	Consider this change should be subject to normal planning scrutiny.
Persimmon Homes	Yes	This is in line with paragraph 22 on the NPPF, and enables the district to plan positively, making the most efficient use of land within the local authority.
Long Buckby Parish Council	No	Potential reduction in employment/wealth generating sites should be subject to positive scrutiny and approval.

Northamptonshire Police	Yes	If you remove a proportion of employment land where will people work who live in the houses created? They will need to commute which is what you are trying to avoid. Not all areas suitable for B class activities are suitable for housing
Staverton Parish Council	No	
Althorpe Estates (Lucas Land Planning)	No	We see no need to deviate from Government Planning Policy in the NPPF with respect to either Daventry Town or the rural areas.
Tony Dodd (resident - Welton)	Yes	Too much reliance is already placed on people traveling to work beyond the confines of Daventry (DIRFT, Northampton's EPs, Milton Keynes etc.).
Welton Parish Council	Yes	The area cannot afford to lose business sites.
Badby Parish Council	No	
David George (resident - Kilsby)	yes	
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Francis Jackson Homes	No	
Weedon Bec Parish Council	Yes	
Wilbraham Associates Ltd	No	No
Anthony Davies (resident - Welton)	Yes	
David Williams (resident - East Haddon)	No	No
The Theatres Trust	Yes	Yes

Q18e. Further to the above is there anything else that the plan should cover that is not covered by policy E1? Q18f. If yes please specify		
Name	Response	
	18e	18f
Anthony Davies (resident - Welton)	No	
Braunston Parish Council	No	
Church with Chapel Brampton Parish Council	No	
CPRE	No	
Daventry Town Council	No	Would like to question the specifics detailed in para 3 – as policy E1 is a general policy, An note specifics refer to Towcester and Brackley omitting any similar detail for Daventry.
Mark Wesley (resident - Daventry)	No	The plan should tie up vision and options and not leave open.
Naseby Parish Council	No	
Persimmon Homes	No	
Long Buckby Parish Council	No	
Staverton Parish Council	No	
Althorpe Estates (Lucas Land Planning)	Yes	Policy flexibility is required-particularly within the rural areas
Tony Dodd (resident - Welton)	No	
Welton Parish Council	No	
Badby Parish Council	No	
David George (resident - Kilsby)	No	Better to have buildings in use.
Hollowell and Teeton Parish Council	No	

Nikolas Moore (resident - Boughton)	No	Too wide ranging and gives little support to controlling inappropriate development.
Francis Jackson Homes	No	
Weedon Bec Parish Council	No	Can't specified - we've answered No
Anthony Davies (resident - Welton)	No	
The Theatres Trust	Yes	

### Issue 19- Daventry Economy

Q19a. Is there anything else the plan should cover regarding the economy of the Town? Q19b. If yes please specify		
Name	Response	
	19a	19b
Anthony Davies (resident - Welton)	No	
Braunston Parish Council	Yes	We would like the plan to reference the importance of diversifying employment opportunities to make the local economy more secure over the long term.
Church with Chapel Brampton Parish Council	No	
CPRE	No	
Daventry Town Council	Yes	The plan should cover how it is going to address the lack of office space and encourage businesses to Daventry Town (suitable and affordable units)
Daventry Marches Limited (Nathaniel Lichfield & Partners)	Yes	The Part 2a Local Plan should make reference to the environmental and economic regeneration prospects of The Marches Employment Area, where the Daventry Marches Limited proposals integrate new development to meet the needs of the Town with the regeneration of this run-down employment site. This proposal introduces environmental improvements to this established employment location and mixed use potential to enliven the economic prospects of the estate.
Mark Wesley (resident - Daventry)	Yes	The plan needs to identify the requirement for a mixed economy in the town. Building and planning must be favourable to all types of business, small craft, small office going up in size, even shared space.
Northampton Borough Council		The Issues and Options paper does not refer to Policy S7 of the JCS which seeks the delivery of 28,500 jobs. The Daventry Local Plan should demonstrate how Daventry will contribute to the delivery of this policy over the plan period.
Persimmon Homes	No	
Long Buckby Parish Council	No	

Staverton Parish Council	Yes	More leisure facilities including outside swimming pool. Increase current swimming pool facilities including waves, plume etc. Cycle paths.
Althorpe Estates (Lucas Land Planning)	Yes	There is a concern that much of the housing in Daventry caters for those who commute elsewhere to work-some information on this would be useful as clearly the town might not be as sustainable a development location as might be thought.
Tony Dodd (resident - Welton)	Yes	Promoting skilled and technical employment opportunities linked to the offerings of the new UTC.
Welton Parish Council	Yes	Reference in policy to diversification of employment opportunities (e.g. promoting/supporting specialist engineering businesses with strong links to education provision in the town such as UTC).
Badby Parish Council	No	
David George (resident - Kilsby)	No	
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Francis Jackson Homes	No	
Weedon Bec Parish Council	No	
The Theatres Trust	Yes	

#### Issue 20 – Daventry’s Transport Network Improvement – Policy D5

Q20a. Does the plan need to provide specific policies for transport improvements listed in policy D5?		
Q20b. If yes please specify		
Name	Response	
	20a	20b
Anthony Davies (resident - Welton)	Yes	Not just providing cycle networks but also maintaining them e.g. route 70 needs upgrading between Daventry and Welton
Braunston Parish Council	Yes	We would like to see a policy developed on the A361, an increasingly busy road which will only get busier as the town grows.
Church with Chapel Brampton Parish Council	No	
CPRE	No	
Daventry Town Council	Yes	Policy D5 is vague in its aims – therefore separate policies could provide a more focused approach in addressing transport network needs.

Geoff Pullin (Resident-Badby)		How is public transport to be better funded? Make sure that a cycle way to Long Buckby station from Daventry is included in the improvement of the direct road (not the indirect B road)
Highways England		In relation to Policy D5 – Daventry’s Transport Network Improvement, Highways England acknowledges the references to improving the district’s public transport systems and connections and extending the cycling network across the district. This Policy is welcomed by Highways England as a means of reducing vehicle trips and will help to satisfy Objective 3 – Connections of the consultation document.
Tony Dodd (resident - Welton)	Yes	Address the removal of county-wide travel subsidies or see much more use of the private car.
Welton Parish Council	Yes	Public transport systems within the town and between the town and rural settlements in line with plan objectives.
Badby Parish Council	Yes	Residents in rural areas depend on bus routes. It is felt that rural bus services should run more regularly and later into the evenings in order to create and retain vibrant villages and town centres. An improved, integrated and co-ordinated bus service to Long Buckby Railway Station would be an advantage.
David George (resident - Kilsby)	yes	Urgent attention to the increasing use of the A5/A361 through Kilsby to and from DIRFT. Stop HGV's using the Ridgeway and Londown Lane as a shortcut to the A45 and the Prologis site in Coventry
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Francis Jackson Homes	No	
Weedon Bec Parish Council	yes	1 Better cycle connectivity to surrounding villages by dedicated cycle ways not 'on road' lanes marked by white lines 2 Long Buckby station will need a lot more than better connections to Daventry town to make it a station of choice. Surely no one moves to Daventry to commute from Long Buckby? Commuters probably bring more income to Daventry than local employees so it would be better to improve connectivity to Northampton where there is a choice of train services; suggest a park and ride on the edge of Daventry with a FAST bus using the DDL to Northampton station. 3 it is noted in the Vision on p 16 that DIRFT is well connected a sustainable transport network to surrounding workforce. This is only true from Rugby - it is virtually impossible to get there by bus from Weedon area as existing bus services do not connect and there are no suitable buses on Sunday - logistics is a 24/7 work environment.
The Theatres Trust	Yes	

Q20c. Should other transport improvements be specified in a policy? Q20d. If yes please explain what these should be and why they would be justified.		
Name	Response	
	20c	20d
Anthony Davies (resident - Welton)	Yes	Road improvements and management is needed to anticipate increased demand. The traffic along C20 (Daventry to Watford) has increased dramatically in recent years - particularly heavy lorries using the lorry park at the Watford A5 crossroads.
Braunston Parish Council	Yes	Alongside an upgraded bus station, we would like to see the plan reference realtime display times at the bus station, and at bus stops.
Church with Chapel Brampton Parish Council	No	
CPRE	No	

Daventry Town Council	No	
Guilsborough Parish Council	Yes	Strengthen bus links from villages to long Buckby station, Daventry and Northampton. New strategic cycleways between major village and on approach routes into main towns.
Kilsby NDP Steering Group for Kilsby Parish Council	Yes	There needs to be a policy seeking to restrict the use of The Ridgeway and Longdown Lane as a cut-through for HGV vehicles travelling between DIRFT and the A45.
Mark Wesley (resident - Daventry)	Yes & no	if in a policy , it is by default part of the plan and integral to it making it more likely to be implemented - eg cycle only routes , corridors for transport connections , road improvements with town growth - eg x houses within x miles means Daventry link road is duelled
Long Buckby Parish Council	No	
Staverton Parish Council	Yes	Better ring road. Extend A45 ring road straight on past west side of Fords to join A45 towards Braunston.
Althorpe Estates (Lucas Land Planning)	Yes	As noted above.
Tony Dodd (resident - Welton)	Yes	Improved safety and load rating for the A361 throughout the district to prevent collapse and closure. Improvements to pedestrian and cycle access between Middlemore and Town Centre for safety reasons, improved egress from Lang Farm in morning peak traffic times to reduce vehicle emissions.
Welton Parish Council	Yes	Improvements in A361, a major north south artery subject to increasing pressure from heavy goods vehicles. Safety issues for pedestrians also evident on footpaths flanking Danetre Reservoir (40mh zone here). Encourage alternative/better routes than A361 for M1/A5.  Alleviate congestion issues in Daventry at peak time.
Northamptonshire County Council (Planning Services)		The Part 2a Plan should expand upon Policy D5 of the Part 1 Core Strategy to address route options for sustainable transport links to Long Buckby and other attractions within and adjacent to Daventry.
Badby Parish Council	No	
David George (resident - Kilsby)	Yes	See Q20b
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Francis Jackson Homes	No	
Weedon Bec Parish Council	Yes	All as listed in 20c previous
The Theatres Trust	Yes	

**Issue 21- Daventry's Transport Network Improvements – Policy D5**

Q21a. Is there anything else the Local Plan needs to cover regarding transport for Daventry Town? Q21b. If yes please specify		
Name	Response	
	21a	21b
Anthony Davies (resident - Welton)	No	
Braunston Parish Council	Yes	We consider there is merit in considering the benefits and challenges of introducing a Workplace Parking Levy, which might have the potential to support more sustainable transport options.
Brixworth Neighbourhood Plan Steering Group	No	
Church with Chapel Brampton Parish Council	No	
CPRE	No	
Daventry Town Council	Yes	Refer Q20b
Geoff Pullin (Resident- Badby)		Need to keep adequate convenient free car parking during disruption by building development works in town centre.
Guilsborough Parish Council	No	Keep the current wording but: B) add 'o identified local value' C) add 'and neighbourhood plans' E) add 'and its character' G) add 'unless otherwise identified in neighbourhood plans' ii) replace 'may be under threat' with 'are under threat' iii) add 'has been informed by the neighbourhood plan process or where this is silent...by an effective community consultation...' (Need to ensure the NP plan has precedence and that a community consultation cannot override an NP) Meeting local housing need is important especially affordable housing (shared ownership, social rented, starter homes and specialist housing), rather than an emphasis on market housing led developments bringing in affordable housing. This does not mean that market houses do not need to fully contribute to affordable housing, rather that the priority should be on opportunities to secure sites with some enabling development etc) Such approaches should be neighbourhood plan led. Time needs to be allowed for NP's to progress ahead of LP Part 2 policies being too specific.
Mark Wesley (resident - Daventry)	Yes	Parking provision with expansion in mind. Possible allocated periphery car parks - park / ride type options.
Persimmon Homes	No	
Long Buckby Parish Council	No	
Staverton Parish Council	Yes	See 20B and Q20D.
Tony Dodd (resident - Welton)	No	
Welton Parish Council	No	
Badby Parish Council	No	
David George (resident - Kilsby)	No	
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Francis Jackson Homes	No	
Weedon Bec Parish Council	Yes	Please do away with the 'pods' as described in the masterplan
Wilbraham Associates Ltd	No	

The Theatres Trust		
Savills (Christ Church, Oxford)		Paragraph 13.40 of the WNJCS reports that some improvements are required in respect of strategic cycling network to the north west of Daventry, especially to the employment areas. Delivery of additional residential and employment development, as proposed by the College, provides opportunity to consider and assist in delivery of such improvements. In response to <b>Question 21 (Daventry's Transport Network Improvements)</b> due consideration should be afforded, through the Local Plan Part 2a process, as to the delivery of improvements to the Transport Network.

## Issue 22- Policy R1

<p>Q22a. It is considered necessary to expand on policy R1 within the Part 2 Local Plans. We consider that the following need further attention:</p> <ul style="list-style-type: none"> <li>• Additional criteria relating to meeting local housing need</li> <li>• Broader exceptions criteria</li> <li>• Definition of environmental improvement</li> </ul> <p>Do you agree?</p> <p>Q22b. If yes please, set out what further detail is required, for example how you would define an environmental improvement</p>		
Name	Response	
	22a	22b
Andrew Granger & Co - Various Sites	Yes	<p>In the context of the related comments above it is crucial to provide a policy framework which positively plans for the delivery of housing need and demand in the rural area. Para 6.1, 6.2 and 6.3 recognise that the delivery of housing in the rural area is crucial to the spatial strategy for the whole District. The supply to date in the rural area demonstrates a demand which will be unreasonably restricted by Policy R1 and its supporting text.</p> <p>It's apparent from the part 2a document that the need and demand for new homes in the rural area will not be met, and will be clearly exacerbated and compounded for the remainder of the plan period. Policy R1 should be reappraised to determine the number of new affordable homes that can realistically be provided for as exception sites, allied to the number of private homes needed to fund the gross under-provision of 37% stated in para 2.6. Likewise an assessment needs to be made of the capacity and requirements for community services, and how and where this can be met in order to positively plan to deliver the requisite number of news homes and infrastructure which will sustain the rural area and fulfil objectives 9 and 10.</p>
Mr and Mrs Wills, Owners of the land west of Coton Road, Guilsborough (Barton Willmore)	Yes	To maintain or enhance rural communities in accordance with the core planning principles set out at paragraph 17 (bullet 5) and paragraph 55 of the NPPF.
Boughton Parish Council	Yes	An environmental impact is identifying opportunities which will improve and enhance local communities and the lives of residents within Daventry District. Could traffic calming be included in this policy
BRANE, Brixworth - Bob Chattaway		Broader exceptions criteria should be maintain the spirit of the Policy and sustainability should take into account the capacity of the infrastructure to cater for existing need and natural growth.
Braunston Parish Council	No	
Brixworth Neighbourhood Plan Steering Group	Yes	Item G (ii) should also take into account if potential development severely affects facilities that are full and should not be further stretched, for example on a constrained Primary School site.
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)	No	It is not necessary to expand on Policy R1 of the WNJCS. Local housing need will be specific to individual villages, and what represents exceptions criteria and environmental improvement will be specific to individual sites. We consider that Policy R1 is already too long. In our opinion Policy R1 provides sufficient detail for applicants when preparing applications and decision-makers when deciding applications. The addition of further criteria against which development in rural areas should be considered is likely to increase the prospect of acceptable proposals failing to comply with all the specified criteria, potentially leading to uncertain decisions. Paragraph 154 of the NPPF states that "....Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan".

Chris Myers (Resident- Long Buckby)	Yes	I do agree that you should give further consideration to additional criteria relating to meeting local housing need – a more robust and up-to-date Affordable Housing Strategy, broader exceptions criteria, and a definition of environmental improvement which would refer to air quality, noise and light pollution, litter and dumping of waste, safety.
Church with Chapel Brampton Parish Council	No	
CPRE	Yes (in part)	Q22a We agree in part. The case for broader exceptions criteria has not been explained and it is not clear that this is appropriate. Surely policy H3 will suffice? Q22b An environmental improvement would require a tangible and lasting benefit to the community, amenities and natural environment, for example, by removing dangerous and/or derelict structures.
Gladman- various sites		<p>The consultation document sets out that the strategy adopted in the WNJCS is to direct greater levels of growth to Daventry Town, and the Council believe this would be undermined unless further development in the rural area is controlled.</p> <p>Whilst it is understandable that the majority of growth is directed towards Daventry as the district's main town, the delivery of a certain amount of housing here should not be viewed as an end in itself; the district has an established need for housing that private-sector housebuilders are expected to deliver and there is clearly strong demand for housing in the rural area (and an ongoing affordability issue). This demand should be met as far as possible as long as the harm does not significantly outweigh the benefits. Further, if over the plan period monitoring shows that the required housing is not being delivered in Daventry Town then the shortfall would have to be made up in the rural area. With this in mind the plan should seek to allocate further sites in the rural area; this would guard against the urban extensions at Daventry not delivering in the required timescales or the required numbers.</p> <p>The requirement set for the rural area is acknowledged to be a minima, and as such there is no harm in allocating a greater number of houses here provided they are in sustainable locations.</p> <p>The Government's <i>10-point plan for boosting productivity in rural areas</i>, published in August 2015, wants to make it easier for people to live and work in rural areas. It sets out that 'Improving the conditions for people to live and work in rural areas would help create more flexibility of labour markets, ensure that people with the right skills can be matched to job opportunities in rural areas, and facilitate the creation of new businesses'.</p> <p>It also considers that lack of housing in rural areas is a particular constraint to labour and entrepreneurial mobility, and 'the stock of housing is limited in rural areas relative to demand and house prices are on average 6.7% higher in rural areas than in urban areas'. None of this will be addressed if authorities like Daventry deliberately constrain the delivery of housing in rural areas.</p> <p>Paragraph 28 of the Framework makes clear that 'planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development' and sets out that local plans should:</p> <ul style="list-style-type: none"> <li>• support the sustainable growth and expansion of all types of business and enterprise in rural areas, both</li> <li>• through conversion of existing buildings and well designed new buildings;</li> <li>• promote the development and diversification of agricultural and other land-based rural businesses;</li> <li>• support sustainable rural tourism and leisure developments that benefit businesses in rural areas,</li> <li>• communities and visitors, and which respect the character of the countryside. This should include</li> <li>• supporting the provision and expansion of tourist and visitor facilities in appropriate locations where</li> <li>• identified needs are not met by existing facilities in rural service centres; and</li> <li>• promote the retention and development of local services and community facilities in villages, such as local</li> <li>• shops, meeting places, sports venues, cultural buildings, public houses and places of worship</li> </ul> <p>Again, constraining development in the rural areas will not address these points and would not be in line with the approach of the Framework. Gladman agree that the Part 2 Plan should set out a definition of environmental improvement to provide clarity, but the policy should not be overly prescriptive and should recognise that there are a variety of ways of achieving 'environmental improvement', including through off-site measures and the payment of financial contributions.</p>
Daventry Town Council	No	
Framptons	Yes	Local housing need criteria, to include specialist accommodation for the elderly. Exceptions criteria to include specialist accommodation for the elderly and Starter Homes.
Guilsborough Parish Council	Yes	

Mr DJS & Mrs SE Wilson (residents – Badby)	Yes	<p>With regard to criteria for meeting local housing need, we ask that consideration be given to the inclusion of an additional policy to the following effect:</p> <p>In the Rural Settlements and in particular the Restricted Infill Villages and Hamlets where there is limited suitable land available within the established confines of the settlement and a dearth of infrastructure or facilities to support significant growth in a sustainable manner, securing the identified affordable housing needs of the community should take priority over speculative development on land owned by Daventry and District Housing Association (DDH) or other Registered Housing Provider/s for the following reasons:</p> <p>In the interests of securing the identified affordable housing needs of the community in a sustainable manner whilst ensuring that new development does not bring about the extension of development into the open countryside to the detriment of the landscape, the distinctiveness, the character and the setting of the rural settlements.</p> <p>Background The DDC Badby Housing Needs Survey 2013 identified a need for 4 x 2 bedroom affordable bungalow units for rent.</p> <p>DDH has recently gained planning permission (DA/2015/0912) to build one 4 bedroom house and one 3 bedroom house for sale on the former garage site which they own on Pound Lane, Badby ie. brownfield land within the existing confines of the village.</p> <p>There is limited scope for further growth of Badby village without spilling out beyond its valley setting and established confines into the surrounding unspoilt Special Landscape Area countryside to the detriment of that landscape and substantial harm to setting and character of the village within that landscape. Given the dearth of suitable land and the lack of infrastructure and facilities, it is hard to see how the village can accommodate let alone support the scale of development envisaged in WNJCS Policy HS2 in anything like a sustainable manner to secure the required amount of affordable housing.</p> <p>We do not think this can be the best outcome in circumstances such as these which surely cannot be unique in the District.</p>
Copesticks Ltd	Yes and no	Policy R1 is broadly sound. Planning decisions should be made in accordance with the policy rather than a moratorium on new development in rural areas when the Authority believes it has a 5 year housing land supply.
Tony Dodd (resident - Welton)	Yes	Draw from Objectives 3.3 to achieve environmental improvements.
Moulton College (Turley)	Yes	It is considered that sustainable sites which are on the fringe of existing rural services centres, which may perform well in the settlement hierarchy (ie where there is a good level of provision of jobs, services and facilities) could be released for additional residential development, subject to satisfying local needs criteria and any exceptions policy. In this regard, it would be helpful for a local policy to be developed which provides more clarity on the criteria which would need to be satisfied, with particular reference to a broader exceptions policy within (or on the edge of) suitable settlements.
The DM Wood Wills Trust (Berry Bros)	Yes	<p>(selected paragraphs of submission)</p> <p>We agree that Policy R1 requires further clarification and broadening and is currently used as blocking policy to any further development in the rural areas, even with regard to a single infill plot within an existing rural settlement. Whilst the Issues and Options consultation document at page 41 paragraph 6.1 acknowledges that the housing figures expressed in the West Northants Joint Core Strategy are “expressed as ‘about’ and are not a ceiling” in practice the figure is used very much as a limit to development.</p> <p>The criteria of Policy R1 are however so constraining as to screen out virtually all housing proposals in the rural areas, even infill plots that cause no harm to any amenity considerations. The difficulty now is relaxing these controls whilst still being in conformity with Policy R1 of the higher order plan.</p> <p>In our view the key lies in the Council’s interpretation of the words ‘Housing requirement for the rural areas’. It is clear and acknowledged that there is some flexibility in the housing requirement figures as indicated in the Core Strategy. The figure is given in the Core Strategy as ‘about 2,360’ houses for the rural area. As set out above it is our view that a target figure was only brought about to ensure an urban focused housing policy. The Council could therefore clarify its interpretation of Policy S3 of the Core Strategy and the meaning of the word ‘about’ which for example could be expressed as a percentage either way (i.e. + or – 25%) or if the balance between urban and rural sites are with a certain percentage of each other. Such that an urban focus is retained and the Core Strategy objectives is maintained and housing supply is ensured.</p> <p>We would also recommend that further clarification is given to part i) of Policy R1 which advises housing will only be permitted where environmental improvements would result. Such environmental improvements should be linked to the NPPF definition of the environmental role that the planning system should contribute to, such as, contributing to the protection and enhancement of the natural, built and historic environment, improving biodiversity and sustainability in terms of minimising pollution and use of natural resources. Improving sustainability and minimising pollution will then tie in with a policy to direct developments to the more sustainable villages as identified through the village hierarchy.</p>

		Equally part ii) of Policy R1 should be further clarified and explained and also linked back to the NPPF and the definition of the social role of the planning system, which for housing is required to meet the needs of present and future generations by creating a high quality built environment with accessible local services that reflect the community's needs and support its health social and cultural well-being.
Welford Parish Council	No	
Welton Parish Council	Yes	Environmental improvement definition which draws on Objectives in 3.3 e.g. 1, 2, 12.
Badby Parish Council	Yes	Cannot be an assumption that Badby is protected and therefore clarification would be beneficial. There should also be clarification as to who additional housing should be for.
Scaldwell Parish Council	No	
David George (resident - Kilsby)	Yes	Due consideration to Neighbourhood Plans where they exist
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Overstone Parish Council	Yes	Provision of 1 bed starter homes to allow young adults to access the property ladder whilst staying within the parish. single storey units for older residents exception sites that meet the local need Enhancement of footpaths/cycle routes to achieve environmental improvements.
Moulton Parish Council	Yes	Need to provide 1 bed units to allow young adults to remain in the community. Single storey dwellings for older residents. Exception sites that meet local need not necessarily district wide needs. Enhancement of pedestrian /cycling routes to achieve environmental improvement.
Francis Jackson Homes	No	
Weedon Bec Parish Council	No	
Wilbraham Associates Ltd	Yes	
The Theatres Trust	Yes	
Maidwell with Draughton Parish Council	Yes	We feel that the overall direction of the Core Strategy, DDC Local Plan and the consultation document on the Local Plan Part 2a is right in respect of concentrating housing growth in the localities in the district which had the greatest level of infrastructure, services and amenities. Daventry Town obviously takes the lead, and our rural settlements should contribute but in scale depending on the degree to which each village has and can provide the necessary infrastructure, services and amenity.  There should be a presumption that disused brown-field sites should be developed before greenfield.  If a specific housing need is shown and would be sustainable, relevant applications should be considered.

Q22c. Should anything else be included?

Name	Response
Andrew Granger & Co - Various Sites	See above

Brixworth Neighbourhood Plan Steering Group	No
Church with Chapel Brampton Parish Council	Properties should be considered for Local Residents to downsize without moving away from villages. Not necessarily 'affordable' but 'manageable'
CPRE	Yes. In dealing with pre-existing buildings outside the confines they will only be suitable for redevelopment if they will be environmentally acceptable and will not impact adversely on the amenities of the existing community. For example, a long derelict farm building some distance from a village might introduce light pollution if planning permission were to be granted, and there may be adverse and disproportionate impacts on roads, safety and infrastructure.
Long Buckby Parish Council	No
Staverton Parish Council	Full consideration be given to each neighbourhood development plan before any development considered.
Farthingstone Parish Council	Yes. In dealing with pre-existing buildings outside the existing confines they will only be suitable for redevelopment if they will be environmentally acceptable and will not impact adversely on the amenities of the existing community. For example, a long derelict farm building some distance from the community might introduce light pollution if planning permission were to be granted, and there may be a disproportionate impact on roads, safety and infrastructure.
Copesticks Ltd	R1 should acknowledge that the rural area incorporates one of the largest regional employment centres and make provision for building new homes in sustainable locations close to where people work.
Tony Dodd (resident - Welton)	Target high quality design and energy efficiency way above basic compliance with building regulations (e.g. PassivHaus standards).
Welford Parish Council	We do not consider R1 should be amended as per 22a but be amended as follows: Should be revised to make 9v) a pre-requisite for housing controls once the 'housing requirement' has been met subject to (i) – (iv) having been met. Local housing need should only be proven by rigorous DDC needs survey and not generalised/anecdotal statements of need.
Welton Parish Council	Yes, references to high quality design.
Badby Parish Council	No
David George (resident - Kilsby)	Neighbourhood Development Plans
Hollowell and Teeton Parish Council	No
Francis Jackson Homes	Criterion B - 'open land of particular significance to the form and character of the village' this was/currently is defined in the 1997 Local Plan - once that falls away so will that definition unless it is included in this Part 2 plan and possibly that definition revisited for the sake of clarity and so it is up to date (reflecting the NPPF) and so justified. The Government recently closed their consultation on boosting and facilitating greater delivery of housing in the rural areas including the potential for boosting the supply of housing on sites of 10 or less in the rural area - within and adjacent to settlement boundaries, and also on brownfield land. Within this part 2 plan - regard will need to be had to any national planning policy objectives which may supersede and reflect more up to date national planning policy than the WNJCS at the time of examination/adoption which is more relaxed about, and seeks to facilitate greater housing delivery in the rural areas.

Q22d. Mindful of the spatial distribution in the WNJCS is there a case for further housing allocations in the rural areas?			
Q22e. If yes, what circumstances, in light of Policy R1, would justify this?			
Q22f. Who should the additional housing be for? (please tick one option)			
Option A- Local/Specialist Needs			
Option B- Market housing with policy compliant affordable housing			
Option C- Combination of the above			
Name	Response		
	22d	22e	22f
Andrew Granger & Co - Various Sites		See above	

Mr and Mrs Wills, Owners of the land west of Coton Road, Guilsborough (Barton Willmore)			Option B
Boughton Parish Council	No		Option C
Braunston Parish Council	No		Option C
Brixworth Neighbourhood Plan Steering Group	Yes	Minor adjustment possibly, where primary schools are under threat of not having sufficient pupils, then some development could be allowed in the smaller villages	
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)	Yes	Further housing allocations in the rural areas should be made for three reasons. Firstly, the WNJCS does not seek to prevent additional residential development in the rural areas, and the housing requirement is expressed as an approximate figure - see Policies S3 and R1 and Paragraph 16.16. Secondly, rural housing needs should be met; Paragraph 47 of the NPPF seeks to boost significantly the supply of housing, Paragraph 54 seeks to meet rural housing needs, and Paragraph 55 indicates that additional housing could contribute towards the vitality of rural areas. A need for housing in rural areas and to support the rural economy remains despite the rural housing target having been met. Thirdly, appeal decisions confirm that the housing land supply position in Daventry is marginal with a reliance on larger scale developments, and as such the policies related to the supply of housing are vulnerable at appeal. It is likely that housing would be allowed in less suitable locations if the housing land supply falls below 5 years. Decisions about rural housing should be made in DS&CLP rather than at appeal. It is smaller sites that can be delivered more easily, and should be allocated in DS&CLP.	Option C
CC Town Planning- Land at Flore		Whilst the position in regards to the delivery of housing in rural areas is accepted, the document needs to provide sufficient guidance to inform the production of NDP's but remain flexible enough to accommodate for changing needs over the life of the plan. In relation to this the documents commentary in regards to the rural housing target within Policy S3 of the JCS is welcomed, the figure should not be considered a ceiling and it is expected that rural locations should rightly continue to play a role in the future development of Daventry District. The Client agrees with DDC that the JCS aim for the rural area has been exceeded due to the disproportionate developments in larger villages. With this in mind it is considered that further suitable proposals, in and adjacent to suitable villages, such as Flore, could come forward over the longer term. Such sites would provide a positive and sustainable contribution to housing delivery and bolster the success of wider development strategy for West Northamptonshire in future years.	Option B mainly but with provision for local/specialist needs housing as required
Chris Myers (Resident- Long Buckby)	No	From the perspective of a large village which is straining under excessive traffic, I would say that there is not a case for further housing allocation in this rural area.	
Church with Chapel Brampton Parish Council	No		Option B
CPRE	No NOTE Policy R1 is sufficient. This provides, for example, for the local community to be involved in the planning process and if there is a clear local need, that will become apparent.		Option C

Daventry Town Council	Yes	Avoid dormitory towns – assist with rejuvenation and retention of existing facilities and services	
Barry Howard Homes, Land at Cold Ashby (Framptons)	Yes	As stated in The Yard Appeal at Great Brington (APP/Y2810/W/14/3001057) the Rural Housing Requirement of 'about 2,360' as referred to in Policy R1 should not be seen as a ceiling and therefore should not prevent further residential development in rural areas.  Further allocations should be considered for suitable residential sites which will contribute towards the future rural housing needs of the District.	
Framptons	Yes	Local and specialist need	
Brown Developments, Land at Weedon (Framptons)	Yes	As stated in The Yard Appeal at Great Brington (APP/Y2810/W/14/3001057) the Rural Housing Requirement of 'about 2,360' as referred to in Policy R1 should not be seen as a ceiling and therefore should not prevent further residential development in rural areas.  Further allocations should be considered for suitable residential sites which will contribute towards the future rural housing needs of the District.	Option C
Geoff Pullin (Resident-Badby)			Option C
Great Oxendon Parish Council	Yes		Option C
Guilsborough Parish Council	Yes	The rural allocation target (not a maximum) has been exceeded. The only reason more rural housing should be allocated is where a neighbourhood plan identifies a local need. Then the emphasis should be on affordable housing not market housing. More market housing in villages can be expected to undermine the adopted Local Plan Part 1 policies that support the viability of the major towns and their development.	Option C
Delisle Estates Ltd. (Tyler Parkes Partnership Ltd)	Yes	It is important to the vitality of settlements and it is appropriate that sustainably located sites are identified. There is a national demand for more housing and these should be in suitable locations.	Option C
The DM Wood Wills Trust (Berry Bros)	Yes	As the Issues and Options document accepts the acceleration of housing supply in the rural areas has been as a consequence of the Council's inability to manage its housing supply leading to an under-delivery of predicted housing supply in the urban area. As a result larger than anticipated housing developments have occurred in the villages to make up the urban shortfall of delivery. Some large rural housing schemes have been approved by the authority itself others have been lost on appeal. At page 32 of the Issues and Options document the Council identifies that the shortfall of urban delivery is likely to continue related to the Daventry North East SUE which will fail to deliver housing in the early years of the plan period against its anticipated rate. As a consequence the Issues and Options and call for sites seeks a site or sites to support and additional 500+ dwellings on the edge of Daventry.  In our view the Council should accept that the delivery of housing at Daventry Town will take longer than anticipated. And rather than place their residents in housing need the Council should look to its larger and more sustainable rural settlements to make up either all or part of the urban short-fall.  In this regard in identifying the most sustainable rural settlements, these settlements should be the next in line to accommodate growth if that growth is not being delivered at Daventry Town.  Not only has the policy entirely stagnated the rural areas, it has opened Daventry District up to further speculative applications across the District should it again fall short of its 5 year land supply. The housing land supply is currently at a precarious 5.8 years and with an expected urban housing delivery short-fall due to the lack of delivery of the Daventry North East SUE in the short to medium term a 5 year land supply position could again easily be challengeable. If the Council is to avoid a policy vacuum in the lack of a five year housing land supply position and to maintain a plan led	Option B

		system the Local Plan needs to address the lack of delivery at Daventry Town and to relax the control of Policy R1 on rural development.	
Welford Parish Council	No		
Welton Parish Council	Yes	Acknowledged in 'made' neighbourhood plan.  Meeting the needs of inhabitants of a village who wish to remain there.	Option C
Badby Parish Council	No		Option A
Scaldwell Parish Council	No		
David George (resident - Kilsby)	No		Option C
Hollowell and Teeton Parish Council	No		Option C
Nikolas Moore (resident - Boughton)	Yes	Small scale i.e. fewer than 4 or 5 in infill positions or to replace former industrial sites only	Option B
Overstone Parish Council	Yes	Through adopted NDP	Option A
Moulton Parish Council	Yes	Through adopted NDP	Option A
Francis Jackson Homes	Yes	Changes to the NPFP as recently consulted on by the Government which may supersede at a national level the approach to small scale housing delivery in the rural areas, plus the on-going national housing need, plus stalled delivery elsewhere in the District.	Option B
Weedon Bec Parish Council	Yes	A village may be at a 'tipping point' with regard to for example the viability of its local school or shops; more development could improve local services and make them more sustainable. This could apply particularly apply to a smaller village low in the hierarchy. Suggest DDC should consult smaller communities on this especially if they have not addressed the issue of preferred development in a Neighbourhood Plan	Option C
Maidwell with Draughton Parish Council	Yes	Only if a specific need is proven.	Option C

### Issue 23- Settlement Hierarchy- Policy R1 Services and Facilities

Q23a. Is there anything else that should be included in the list of Most Important Services and Facilities, Important Facilities and Services and Other Facilities?		
Q23b. If yes, please specify		
Name	Response	
	23a	23b
Andrew Granger & Co - Various Sites	Yes	The policy should be amended to allow flexibility for changing/unforeseen circumstances
Anthony Davies (resident - Welton)	Yes	Accessible and fast broadband Physical access to town or large village e.g. Welton is close to Daventry, Canons Ashby is miles from anywhere

Boughton Parish Council	Yes	Dental Surgeries
Braunston Parish Council	Yes	Dentists
Brixworth Neighbourhood Plan Steering Group	No	
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)	No	The category that different types of village facilities fall into is set out in Paragraph 16.10 of the WNJCS. The identified list of services and facilities is typical of those found in the larger and more sustainable villages, both within West Northamptonshire and elsewhere. The list of services and facilities are related to the day to day needs of residents of the villages.
CC Town Planning- Land at Flore	No	
Church with Chapel Brampton Parish Council	No	
CPRE	Yes	Many small communities have underdeveloped infrastructure. There should be explicit recognition of the need for comprehensive and efficient utilities if development is to be permitted. The list would include (and this is not necessarily exhaustive): mains Gas; reliable conventional copper wire telephone and conventional broadband (which must be available to the whole community); mains sewerage; dependable and adequate water supplies; 4G mobile phone connectivity on all networks (or latest widespread and available advanced technology for the period in question). Some of these criteria will be subjective and so there is a need for evidence-based evaluation. For example, telephone providers will say that there is an adequate and reliable service, but the local community may be able to prove otherwise on the basis of number of engineer call-outs and experienced poor reliability.
Daventry Town Council	No	
Barry Howard Homes, Land at Cold Ashby (Framptons)	Yes	Place of worship
Framptons	Yes	Places of worship
Barry Howard Homes, Land at Clay Coton (Framptons)	Yes	Places of worship
Brown Developments, Land at Weedon (Framptons)	Yes	Places of worship
Great Oxendon Parish Council	Yes	Open spaces, park, recreation grounds, children centres
Guilsborough Parish Council	Yes	This part of the consultation is fundamentally flawed in the way the question is asked. Results in relation to these questions will result in an unsound plan. Services are largely catchment led, and should be planned as such with accessibility criteria. The questions do not recognise that a small community may see the 'most important facilities' are a village hall, local play areas, post box etc. The clear implication that those villages with higher order functions (no necessarily the most important for a local community) should be able to take more houses is not logical. People can and do expect to travel by car in rural areas to secondary schools, GP surgeries or larger shops.
Roseneath Estates Ltd (iceniprojects)		<p>We broadly agree with the spatial strategy as set out in Policy R1. However, it is clear that the settlement boundaries themselves need to be reviewed in order to ensure the settlements have adequate capacity to deliver required growth, and avoid the drawing of arbitrary lines around existing property boundaries. The settlement edges should be based on sustainable growth options and not be formed by backs of houses and close boarded fences.</p> <p>The Council should assess the overall sustainability of each village when determining the level of growth appropriate for that village. We consider that the provision of additional housing in these locations can make the settlement more sustainable by supporting existing services and facilities.</p> <p>We consider that Creaton has significant potential to support additional development given the range of services and facilities available (e.g. school, public house, shops &amp; post office).</p> <p>In allowing local communities to identify and meet their own needs (no. 10 of policy R1), the Council should then be supportive of developments that come forward to meet those needs.</p>

Kilsby NDP Steering Group for Kilsby Parish Council	Yes	Adequacy of utilities, availability of high speed broadband, availability of gas. Infrastructure - roads, pavements, parking problems etc.
Messrs Jackson (Landmark Planning)	Yes	Churches, particularly those that offer other social facilities.
Roundhill Northampton (Nathaniel Lichfield & Partners)		Most Important Services and Facilities should include Further Education Establishments and Major Employer or Substantive Employment Area in Proximity.
Mark Wesley (resident - Daventry)	No	
Mulberry Property Developments (Pegasus Group)	Yes	The assessment of services and facilities can only ever be a snap-shot in time. Proposals for development that can deliver improvements to existing services, or deliver entirely new provision should not be constrained by the settlement hierarchy. Where proposals result in improvements to, or provision of new services and facilities, should be considered positively in terms of the approach set out in Policy R1 and the scope for individual settlements to be re-categorised in the hierarchy should be catered for within the hierarchy. The failure to do so will effectively introduce of policy of no change for settlements and perpetually reinforce their classification in the hierarchy.
Naseby Parish Council	No	
Redrow Homes (Pegasus Group)		In general, it is considered that the list of 'most important', 'important' and 'other' services and facilities, as set out in the Issues and Options Paper, is, in general, logical. It is felt, however, that it is important to recognise that existing secondary schools are not necessarily located in the most sustainable locations and the pattern of housing has more typically, and appropriately, grown in those locations which are more sustainable, where there is a better overall provision of facilities and services. School catchment areas are well established and account for this pattern of development. It is felt that this should be taken into account when using secondary schools as an indicator of a settlement's position within the hierarchy.
Gallagher Estates and Jennifer Rowden and Priscilla Knight, Charles Kimbell, Stephen Kimbell and Alexander Kimbell, and Mark Mackaness, Simon Mackaness, Shena Roworth and Oliver Mackaness (Pegasus Group)	Yes	<p>The Issues and Options paper outlines a suggested list of most important services and facilities and important services and facilities and also outlines a suggested scoring mechanism to help to establish the proposed settlement hierarchy. Whilst the outline of most important services and facilities and important services and facilities would appear to be appropriate, care should be taken not to apply an overly mechanistic approach to scoring to establish the relative sustainability of settlements.</p> <p>The establishment of a robust settlement hierarchy needs to be informed by an accurate assessment of available services and facilities but also needs to take into account the often important interrelationships that occur between villages. For example, the lack of a secondary school in a rural settlement does not mean a settlement is unsustainable as there are usually good school bus services providing connections to secondary schools from surrounding settlements.</p> <p>Care needs to be taken in the approach to ensure that the assessment is not driven solely by a scoring system, but that the scoring should be used to inform assessments of the relative sustainability of settlements.</p> <p>For settlements within Daventry close to the Northampton urban area, the assessment of their sustainability credentials should reflect the proximity to Northampton and access to the higher order range of services and facilities available.</p> <p>Gallagher Estates has interests in land to the south-east of Boughton. There is the opportunity to accommodate development in this location to include the provision of new areas of parkland to safeguard the settlement's identity whilst allowing for further growth in a sustainable location adjoining Northampton. The Call for Sites submission outlines the area of land with potential for development. An indicative concept plan shows how development could take place incorporating a new area of parkland to the south of Boughton.</p>
Davidsons Developments Limited (Pegasus Group)		<p>The Issues and Options paper includes a suggest list of 'most important services and facilities', 'important facilities and services' and 'other facilities', along with suggested 'scoring' to ensure a fair and consistent approach for establishing where a settlement is situated within the hierarchy. Whilst we would agree that the outline of facilities and services appears to be comprehensive and appropriate, care should be taken to not applying an overly mechanistic approach to scoring to establish the relative sustainability of settlements. It should be recognised that there are different opportunities for the development of suitable sites (along with size/scale considerations) that are available within different settlements, and these opportunities need to be balanced with the ranges of facilities and services available and any settlement hierarchy.</p> <p>Byfield and Naseby have a good range of services and facilities and represent sustainable settlements capable of accommodating additional housing growth, to provide the necessary flexibility in Local Plan Part 2 to ensure that the needs of the Rural Areas are met over the plan period to 2029.</p> <p>A robust settlement hierarchy should be informed by an accurate assessment of facilities and services, and also needs to take account of the important interrelationships that occur between rural settlements. Therefore although a scoring system can be used to help inform assessments of the sustainability of settlements, it is important that the approach is not driven entirely by a scoring system.</p>

Persimmon Homes	No	
Ravensthorpe Parish Council	No	
Long Buckby Parish Council	Yes	Internal public transport in the largest rural communities (e.g. Long Buckby), cemeteries and crematoria, broadband, on-street parking adjacent to the services and facilities, sufficient for the size of the community.
Staverton Parish Council	No	
Farthingstone Parish Council	Yes	Provision of high quality utility services including evidence based criteria covering mains gas, reliable telephone services and fast speed conventional (copper) broadband (10mbps or more), fibre optic communications (including superfast broadband at 30mbps or more), mains sewerage, dependable and adequate water supplies, 4G or better (according to the best technical standards of the day) mobile telephone communications for all providers.
Althorpe Estates (Lucas Land Planning)		We suggest simplicity in any policy-avoid over-complication of the issues.
Mr DJS & Mrs SE Wilson (residents – Badby)	No	
Copesticks Ltd	No	
Tony Dodd (resident - Welton)		Include "Dentist" in the most important group. Mobile library is a facility likely to disappear as county budget cuts bite so should be removed from the equation and this will add weight to the provision of fixed Libraries / Outreach Centres.
Moulton College (Turley)	Yes	'Other' facilities could include higher education provision, conference, sports or other leisure activities.
Delisle Estates Ltd. (Tyler Parkes Partnership Ltd)	Yes	<p>It is assumed this question is in relation to para. 16.10 of the WNJCS when read in conjunction with Policy R1 particularly the numbered list of factors the rural hierarchy will take into account.</p> <p>The list of the 'most important factors' should include the proximity and accessibility of existing rural employment opportunities to settlements. As presently worded, sub para (3) could be read such that development in rural settlements would only be supported if easy accessibility by public transport to employment in the main towns across West Northamptonshire.</p> <p>It is suggested the proposed Settlements and Countryside Local Plan makes it clear that housing development will be supported in rural settlements which themselves contain, are in close proximity, or easily accessible to, existing rural employment opportunities.</p> <p>The proximity and accessibility of rural employment opportunities</p>
The DM Wood Wills Trust (Berry Bros)	Yes	<p>(selected paragraphs of submission)</p> <p>In general terms we agree that there is a need to assess one village against another to achieve a hierarchy of sustainability and a scoring mechanism is generally part of this process. We agree that the presence of existing services and facilities should be part of the process. The opportunities new development at a settlement might have to up-grade or improve a facility should also be assessed. For example some larger villages have a shop but the quality of the shopping experience varies. It might also be considered that sustaining very small village schools may not be in the best interests of good planning. We therefore consider that both a scoring system and a description of the way in which a village functions is an important part of an overall comprehensive and informed assessment.</p> <p>We also commend an assessment of a settlement's environmental capacity to accommodate additional development.</p> <p>In addition to services and facilities the opportunities and extent to which local employment can be achieved and supported is an important part of overall sustainability assessment. The NPPF sees the third strand of the golden thread of sustainable development as the contribution the planning system should make to ensure a strong and competitive economy and that jobs are provided in the right places to serve communities.</p>
Welford Parish Council	No	
Welton Parish Council	Yes	Dentist in 'most important' category.

Badby Parish Council	No	
Scaldwell Parish Council	No	
David George (resident - Kilsby)	Yes	The place of worship.
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Overstone Parish Council	Yes	Village hall, open green space, primary school
Moulton Parish Council	Yes	Village hall, meeting place, open green space, primary school
Francis Jackson Homes	yes	What about local clubs and facilities, plus other sports facilities (i.e. clubs, pitches, playing fields, etc.), filling stations, social clubs, mobile services, etc.
Weedon Bec Parish Council	Yes	Play areas & sports/recreation facilities should be in category A as they are vital for young families especially for under 12's who need parental supervision; they should be within easy walkable distance of housing so parents can meet
Maidwell with Draughton Parish Council	Yes	High speed broadband should be included. Then the proposed Spatial Policy for the Rural Settlements is appropriate and comprehensive (Policy R1) and that the list of types of services and amenities are what should be taken into account in determining a village hierarchy.

Q23c. Do you agree with what is identified as most important, important and other? Q23d. If no, please outline which services and facilities should be included in each category and why.		
Name	Response	
	23c	23d
Andrew Granger & Co - Various Sites		The policy should be amended to allow flexibility for changing/unforeseen circumstances
Mr and Mrs Wills, Owners of the land west of Coton Road, Guilsborough (Barton Willmore)	Yes	Based on the information provided we are supportive with the assessment of the importance of varying services and facilities. However, further detail will be required in terms of the distances adjudged to be acceptable and the level of bus service required to meet certain criteria and subsequently we will reserve our full judgement until the next stage of this document has been progressed. Based on our assessment, Guilsborough has: seven of the most important services – scoring 9; 2-3 of the important services – scoring 2; and all of the other services – scoring 2. This would give a total prospective score of 13. We would anticipate that Guilsborough will be assessed as one of the most sustainable locations for development in the rural areas – which given the level of service provision is the only sensible outcome of such an appraisal in the context of Daventry District.
Boughton Parish Council	Yes	
Braunston Parish Council		We would like to see employment in the 'Most Important' category.
Brixworth Neighbourhood Plan Steering Group	Yes	
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)	Yes	The list of services and facilities are related to the day to day needs of residents of the villages. The relative importance of the services and facilities are related to how well each one serves those day to day needs. We agree with how each of the services and facilities have been defined in terms of their level of importance. We comment on the access to services and facilities in Moulton and Long Buckby in the 'call for sites' responses.  Moulton contains the following services: convenience stores including a Co-op store and village shops, a post office, public houses, banks, and a petrol filling station. It also provides a range of facilities, including the following: a primary and secondary school, a nursery and pre-school, a further education college, a library, a doctors' surgery/health

		centre, a village hall and sports facility, and play areas. Long Buckby contains the following services: convenience stores including a Co-op store and village shops, post office services, and public houses. It also provides a range of facilities, including the following: a primary school, a nursery and pre-school, a library, a doctors' surgery/health centre, a village hall and sports facility, and play areas. Moulton and Long Buckby should be identified as Primary Service Villages in DS&CLP.
CC Town Planning- Land at Flore	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	No	Within the category "most important" should be included utility services (see Q23b above)
Crick Parish Council		No mention of existing village infrastructure like roads, gas, electricity and water and their ability to take further development. In an age becoming increasingly concerned about obesity and lack of exercise particularly in children to see play areas, sports grounds and allotments in lowest category and a public house/restaurant in the highest seems bizarre and probably should be reversed for good planning.
Gladman- various sites		Gladman generally agree with the range of services and facilities and their grouping into 'most important', 'important' and 'other' categories. We would however highlight that the Framework sets out a fundamentally different approach for testing whether a settlement can be considered sustainable than that based mainly on a consideration of population or number of services. Whilst level of services is obviously an important criterion, the Framework is clear that development should be allowed where it is sustainable, when measured against the Framework as a whole and the three strands of sustainability (economic, social and environmental) in particular. When considering development in rural areas, Paragraph 55 of the Framework states that 'housing should be located where it will enhance or maintain the vitality of rural communities.' Furthermore paragraph 17 states that planning should 'focus significant development in locations which are or can be made sustainable' (our emphasis). We would therefore caution against too prescriptive an approach to allocating development and would urge instead that sites should be judged according to this criteria rather than adhering too closely to a development hierarchy.
Daventry Town Council	No	Post Office is no longer within most important category and should be in other- as retail can provide a similar service. Public House/Restaurant should also be moved to other.
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	No	See answer to Q23 a and b
Kilsby NDP Steering Group for Kilsby Parish Council	No	Local employment provision should be included in the 'most important' category, as should the infrastructure issues set out at 23b above.
Messrs Jackson (Landmark Planning)	Yes	
Mark Wesley (resident - Daventry) (resident - Daventry)	Yes?	Not really sure.
Mulberry Property Developments (Pegasus Group)	Yes	
Naseby Parish Council	Yes	
Gallagher Estates and Jennifer Rowden and Priscilla Knight, Charles Kimbell, Stephen Kimbell and Alexander Kimbell, and Mark Mackaness, Simon		See above.

Mackness, Shena Roworth and Oliver Mackness (Pegasus Group)		
Davidsons Developments Limited (Pegasus Group)		See response to 23b.
Persimmon Homes	Yes	
Ravensthorpe Parish Council	Yes	
Long Buckby Parish Council	No	Secondary schools should be easy access to Broadband is 'most important' Restaurant is not 'most important' Play area is 'important' Library is 'other'
Staverton Parish Council	No	This hierarchy is applicable to large towns and villages, not small villages.
Farthingstone Parish Council	Yes	Q23c Note - with the addition of provision of effective utility services in "most important".
Mr DJS & Mrs SE Wilson (residents – Badby)	Yes	
Copesticks Ltd	Yes	
Tony Dodd (resident - Welton)		Sports facilities are very varied. A community having a full-sized pitch for multiple sports and changing facilities is vastly different from a small-scale football pitch with nothing else suitable only for the local primary school!
Delisle Estates Ltd. (Tyler Parkes Partnership Ltd)	No	See response above.
The DM Wood Wills Trust (Berry Bros)	No	
Welford Parish Council	No	Local employment provision should be moved from (b) to (a) 'Most important'.  Reason: otherwise housing growth would simply create settlements where everyone commutes out.
Welton Parish Council	No	Sports grounds can vary in provision so may need to go in more than one category.  Fixed library/outreach centre in 'most important' category as they are a key element in the well being of communities.
David George (resident - Kilsby)	Yes	Answered yes
Francis Jackson Homes	No	
Weedon Bec Parish Council	No	

Maidwell with Draughton Parish Council	Yes	
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#### Issue 24 – Scoring Mechanism

Q24a. Do you agree with the scoring mechanism proposed? Q24b. If no please specify what should be changed.		
Name	Response	
	24c	24d
Andrew Granger & Co - Various Sites		The policy should be amended to allow flexibility for changing/unforeseen circumstances
Anthony Davies (resident - Welton)	Yes	
Boughton Parish Council	Yes	
BRANE, Brixworth - Bob Chattaway	No	Requires a more realistic assessment of capacity & the scope for improvement. Needs to reflect the existence of users from all localities.
Braunston Parish Council	No	We would like to propose the score is by 'type' rather than number (eg 2 pubs = 1).
Brixworth Neighbourhood Plan Steering Group	No	The process of identifying solely whether a service exists is flawed as it does not recognise the ability of that facility to cope. For example surgeries disproportionately caring for more care homes in their areas of influence where other areas have few or none, and cannot expand further due to a constrained site. There should be a capacity score.
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)	Yes	
CC Town Planning- Land at Flore	Yes	
Chris Myers (Resident- Long Buckby)		Proposed point scoring mechanism for hierarchy of settlements. What is characteristic of Long Buckby: increasingly difficult parking; the station? In consideration of new development, little or no account is taken of how the cumulative effect of multiple major new developments will affect road capacity. (criteria for hierarchy of villages includes this)
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Crick Parish Council	No	The proposed scoring system for Para (1) of the Rural Hierarchy of Policy R1 is not fit for purpose as it simply counts facilities without any consideration of the quality of those facilities. To take a simple example if the scoring is used on Crick and Yelvertoft the numbers come out roughly the same but no-one would say that the facilities are comparable. This is because part of Para 1 has been ignored namely the words 'to meet the day to day needs of residents, including those from surrounding settlements'. The public house and Post Office in Yelvertoft both struggle and would probably benefit from the use of Para 2 of the hierarchy to allow development to seek to keep the facilities sustainable and save Yelvertoft from becoming yet another community dormitory. Indeed, there has been comment from at least one group in that village that more housing is needed to save the current services. This approach is supported in para 6.3 of Vibrant Rural Housing but is then overshadowed by the emphasis on villages with existing services from then on. Conversely no weight in the scoring is given to services that exist but have reached capacity, again using Crick as an example, the school, the medical centre and the village hall are not large enough for the current population of the village.  Therefore, any scoring of Para 1 needs to be on a qualitative basis, having regard to the state of the existing services in each village, as will scoring on many of the other paragraphs.

		<p>Because of Policy R1 Policy creates a hierarchy, and the use of the nomenclature 'Primary Service Village' etc., it needs to be emphasized in Part 2a that all 10 Paras in the hierarchy need to be considered for relevance and weight. The listing order of this part of R1 should not of itself create a hierarchy however it gives the impression of doing so. The effect is that paras like 5, 6 and 7, in particular, appear of lesser standing. These Paras focus more on the local need of the village and its ability to cope with increased development, and arguably are more relevant to the 5 aims towards the end of Policy R1 of the JCS (which is only included in Appendix B in this Consultation Paper) and the 4 aims of Para D of Policy S1 of the JCS, are given at least equal weight based on the fact that these services exist</p> <p>Therefore, it is suggested that if a scoring system is to be used it is applied to all of the criteria with a description to explain the score. It is also suggested that the scoring be between +5 to -5 which would allow 0 to be used if any criteria was inapplicable.</p> <p>Finally, the consultation does not include any suggestions as to the cut-off point between each of the 3 village categories. Is there intended to be a specific number or percentage in Primary and Secondary Service Villages or if a scoring system is to be used, a specific score?</p> <p>The Parish Council therefore believe that the hierarchy system as currently proposed will not produce the results that R1 and S1 of the JCS seek and a more balanced scoring system covering all paragraphs is needed.</p>
Gladman- various sites		As noted above, whilst level of services is obviously an important criterion, the Framework is clear that development should be allowed where it is sustainable, when measured against the Framework as a whole and the three strands of sustainability (economic, social and environmental) in particular.
Daventry Town Council	No	It's ok to score but decision should be made on the quality of the service provided and identified need.
Barry Howard Homes, Land at Cold Ashby (Framptons)	No	The weighting given to 'Important Services and Facilities' is relatively low compared to the other categories
Framptons	No	Important services to score higher
Barry Howard Homes, Land at Clay Coton (Framptons)	No	The weighting given to 'Important Services and Facilities' is relatively low compared to the other categories
Brown Developments, Land at Weedon (Framptons)	No	The weighting given to 'Important Services and Facilities' is relatively low compared to the other categories
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	No	The service identification as being the 'most important' is fundamentally flawed. A catchment / hierarchy approach would be more appropriate to use. A Secondary School or GP Surgery for example may be most important but in the context of a (say) a 20 minute drive; a general food store or post office may be most important but within (say) a 10 minute drive and a playground most important but within (say) a 10 minute walking distance. To end up with a hierarchy that suggests, for example, that a police station or residential care home is 'less important' than a public house, would not be a robust assessment of what people actually mean, or what is sustainable
Home Builders Federation		It is suggested that the Local Plan Part 2A should establish a settlement hierarchy based on ranking / scoring of facilities.
Badby Parish Council	No	The scoring should be qualitative as well as quantitative. It is seen as too simplistic. There is no distinction between the levels of service which are considered significant in service provision.
Scaldwell Parish Council	Yes	
David George (resident - Kilsby)	No	It is too crude and should be refined by consultation with each community

Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Overstone Parish Council	Yes	
Moulton Parish Council	Yes	
Francis Jackson Homes	No	Seems a bit arbitrary and a village with 4 Most Important Services and Facilities scores 6, but would only get to a score of (why the jump to 9?) with a further 3 services - the system isn't that helpful as it isn't transparent or justified yet.
Weedon Bec Parish Council	No	It is too mechanistic. Qualitative issues should be taken into account and the views of local residents sought . less measurable things like connectivity preferably on foot to avoid congestion on village roads, availability of parking near facilities, the quality of services and infrastructure and its ability to adapt - what is in place may appear adequate but may need serious upgrading to accommodate additional use and the financial resources for this are not likely to be available within a parish. The scoring system is not robust enough to be used in isolation without looking at how a village functions and seeking local people's views on this.
Maidwell with Draughton Parish Council	Yes	See answer to 26b.

#### Issue 25 – Settlement Hierarchy – Policy R1 (Criteria 2-10)

Q25a. How should criteria 2-10 be applied to the settlement hierarchy? (tick one box only)		
Option A- a score against each		
Option B- a description against each		
Option C- Combination of the above		
Q25b. Is anything required further to the criteria 1 to 10 of Policy R1 to help establish the settlement hierarchy?		
Name	Response	
	25a	25b
Andrew Granger & Co - Various Sites		A quantitative assessment for housing and community infrastructure for each settlement, together with a qualitative appraisal is of paramount importance in determining the spatial strategy for the supporting rural communities. Scoring to determine stratifying hierarchies is helpful but cannot be the sole guide to deciding matters which have a human impact.
Mr and Mrs Wills, Owners of the land west of Coton Road, Guilsborough (Barton Willmore)	Option B	It is considered that trying to force a numeric system against such matters will be prone to inaccuracies which would diminish the overall robustness of the hierarchy.
Anthony Davies (resident - Welton)	Option C	
Boughton Parish Council	Option C	
BRANE, Brixworth - Bob Chattaway		It is necessary not to just identify function but capacity as well. This can be affected both by current and anticipated natural growth and physical constraints such as landscape and other environmental factors.

Braunston Parish Council	Option A	There should be a weighting applied to the criteria 10) ENABLING LOCAL COMMUNITIES TO IDENTIFY AND MEET THEIR OWN LOCAL NEEDS would be the most significant then 4,3,6,5,8,9,2,7
Brixworth Neighbourhood Plan Steering Group	Option B	
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)		<p>The definition of the settlement hierarchy is related to population, the role and function, and the range of services and facilities, and the potential for those factors to change. In our experience these are the factors that determine the settlement hierarchy elsewhere. Therefore, in our opinion, Criterion Nos. 1 to 3 in Policy R1 should be the key factors in decisions about the settlement hierarchy. The other criterion, Nos. 4 to 10, are related to either meeting future development needs or environmental related constraints. The environmental, historic, or capacity constraints of a village might restrict the future growth of a village, but these factors are not relevant to the status of a village in the settlement hierarchy. For example, a larger settlement might have a good range of services and facilities and be accessible by public transport, and as such in any definition of the hierarchy or scoring mechanism should be defined in the first tier of the hierarchy.</p> <p>However the settlement hierarchy is defined in DS&amp;CLP we expect that Moulton and Long Buckby will be identified as Primary Service Villages whatever criteria or scoring mechanism is used.</p>
CC Town Planning- Land at Flore	Option C	
Church with Chapel Brampton Parish Council	Option C	
CPRE	Option A Note As a scoring mechanism is already proposed, it would be counter-intuitive to use a different approach for the criteria within policy R1. It is not clear what is meant by "B". If an explanatory note is envisaged, it might be helpful.	No
Gladman- various sites		For the sake of clarity and transparency the settlement hierarchy should set out both a score and a description, and explain what services and facilities have been assessed as contributing to the score. When establishing the settlement hierarchy, the Council should be aware that the Framework sets out as a core planning principle that planning should 'focus significant development in locations which are or can be made sustainable' (our emphasis). This means that the lack of a facility or service should not automatically count against a settlement if the service or facility could be provided as part of a sustainable development.
Daventry Town Council	Option C	
Barry Howard Homes, Land at Cold Ashby (Framptons)	Option C	
Barry Howard Homes, Land at Clay Coton (Framptons)	Option C	
Brown Developments, Land at Weedon (Framptons)	Option C	
Guilsborough Parish Council		The criteria are flawed and results from this question will be unsound

Northamptonshire County Council (Planning Services)		<p>Although it is accepted that the Part 1 Core Strategy includes a policy that sets out a settlement hierarchy categorisation and that this categorisation should be driven by village facilities/services, it nevertheless appears to the County Council that this approach and how the Part 2a Plan is to take this forward seems rather old fashioned in its approach.</p> <p>Establishing a hierarchy based on current village facilities/services when these have been subject to a great deal of flux over the years (and by flux this largely means decline), seems to be to be planning based on the current situation rather than by what could be a potentially more sustainable approach. In many ways it is disappointing that an exercise based on existing facilities has not been carried out already to feed into the consultation document as this could have aided discussion around the options.</p> <p>It is considered that the settlement hierarchy should be based around a spatial distribution that focuses any development outside Daventry to the already key settlements on the primary road network (or on the rail network but with an existing station) and to settlements that are closely related to the Northampton urban area.</p>
Badby Parish Council	Option C	As noted above, qualitative weighting should be added.
Scaldwell Parish Council	Option A	
David George (resident - Kilsby)	Option A	Community feedback needed.
Hollowell and Teeton Parish Council	Option C	No
Nikolas Moore (resident - Boughton)	Option A	
Overstone Parish Council	Option C	
Moulton Parish Council	Option C	
Francis Jackson Homes	Option C	
Weedon Bec Parish Council	Option C	See previous at 24b - the scoring system should only be a guide. The day to day experience of existing residents should be canvassed
Maidwell with Draughton Parish Council	Option C	A scoring mechanism might be give an initial assessment of a village's place in the hierarchy but that it should not be the determining method. The quality and extent of each service and amenity cannot be quantified in this way. The wording of the 10 criteria in Policy R1 should be the over-riding guide in determining the hierarchy.

#### Issue 26 – Village Confines – definition criteria

Q26a. Are the criteria set out in table 3 on page 49 of the Issues and Options consultation document appropriate? Q26b. If no how should they be changed?		
Name	Response	
	26a	26b
Andrew Granger & Co - Various Sites	No	Underlying presumption restricts any meaningful delivery of new homes and infrastructure related to the needs and demand to sustain communities in the rural area.
Anthony Davies (resident - Welton)	No	".....dwellings ....peripheral to the village" needs amplification because all buildings at the edge of a village are "peripheral"

Boughton Parish Council	Yes	
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	Yes	
CC Town Planning- Land at Flore		Given the importance of exceptions sites and the significant role which they have in meeting need, it is considered that the proposed criteria for defining village confines should be further defined or alternatively that village boundaries should be established through a revised proposal map.
Chris Myers (Resident- Long Buckby)		Proposed Criteria for Village Confines – definition criteria seem suitable to Long Buckby, <b>but</b> we do have wedges of land which are related to the open countryside but lie between spurs of developed land. These have historically been outside the confines and should remain so.
Church with Chapel Brampton Parish Council	Yes	
CPRE	No	In addition, public footpaths and bridleways through open space should be outside the confines of the village. Similarly, any area visible from public rights of way that provide good views of prominent village features (for example, churches and attractive buildings) or of open countryside should also be outside the confines of the village.
Crick Parish Council	Yes	These are appropriate
Gladman – various sites		The characteristics that define the ‘confines’ of a settlement will vary from settlement to settlement and as such Gladman do not believe that seeking to define the confines on this basis is a robust approach that adequately takes into account the unique character and context of each settlement. Instead, as with our answer to question 14, Gladman believe that there is no need to apply a settlement boundary policy (defined either on a map or in the text) as development on the edge of settlements in the rural area should be judged on the basis of whether or not it is sustainable in terms of the criteria set out in the Framework. Creating a hard-and-fast settlement boundary in effect creates a ‘presumption against development’ in areas adjacent to Daventry but outside the boundary; Gladman recommend that this policy needs to be significantly revised to provide a more permissive approach to development. We suggest the following rewording to this element of the policy: “Development in the Open Countryside adjacent to existing settlements will be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development.”  This approach would enable an assessment to be performed on a site-by-site basis as part of the planning balance exercise and the Council would still be able to refuse harmful development.
Daventry Town Council	Yes	
Mr and Mrs Clayton, Marley Farm, Byfield (Framptons)	Yes	On the basis table 3 is the table below paragraph 6.11, the criteria are considered appropriate.
Barry Howard Homes, Land at Cold Ashby (Framptons)	Yes	On the basis table 3 is the table below paragraph 6.11, the criteria are considered appropriate.
Framptons	No	Dwellings and agricultural buildings abutting or bordering the main village should be included. Do not want to encourage isolated dwellings in the open countryside
Barry Howard Homes, Land at Clay Coton (Framptons)	Yes	On the basis table 3 is the table below paragraph 6.11, the criteria are considered appropriate.
Brown Developments, Land at Weedon (Framptons)	Yes	On the basis table 3 is the table below paragraph 6.11, the criteria are considered appropriate.
Geoff Pullin (Resident- Badby)		B should exclude large developments allowed on appeal during the recent silly season. G seems a bit unnecessary limitation.
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	Yes	Assume p46 is meant

Nikolas Moore (resident - Boughton)	Yes	
Overstone Parish Council	Yes	
Moulton Parish Council	yes	
Francis Jackson Homes	No	Some of these contain phrases that need definitions, or supporting text at very least.
Weedon Bec Parish Council	No	As said at 24 & previous you are ignoring qualitative issues including how a village works. You should be consulting residents on how they see the village by organising a more local presence; you might be pleasantly surprised at the ideas they offer.
Maidwell with Draughton Parish Council	Yes	

### Issue 27- Village Confines- which villages/settlements?

<p>Q27a. What is the most suitable approach for establishing Village Confines in the District?  Option A- Village confines for Primary Service Villages only  Option B- Village confines for Primary and Secondary Service Villages  Option C- Village confines for Primary, Secondary Services Villages and Other Villages  Option D- No village confines defined on plans; rely on textual definition only  Q27b. Subject to the above, for those settlements that do not have a confines defined, do you agree a textual definition is the right approach?  Q27c. If no what alternative can be used?</p>			
Name	Response		
	27a	27b	27c
Andrew Granger & Co - Various Sites	Option D		To be supplemented by wider understanding of the needs of rural community; and allowing flexibility to accommodate same. Delivery of homes and community infrastructure is paramount, as is meeting National Policy Requirements.
Mr and Mrs Wills, Owners of the land west of Coton Road, Guilsborough (Barton Willmore)	Option B	If it was feasible to do this for the 'Other Villages' as well then that would be our recommendation.	
Anthony Davies (resident - Welton)	Option C	Yes	
Boughton Parish Council	Option C		
Braunston Parish Council	Option C	Yes	
Brixworth Neighbourhood Plan Steering Group	Option B	Yes	
CC Town Planning- Land at Flore	Option B	Yes	

Church with Chapel Brampton Parish Council	Option A	Yes	
CPRE	Option C	Yes	<p>Primary and Secondary Service villages are presumably defined according to WNJCS policy R1. There needs to be explicit recognition of something akin to "Limited Development Villages" defined as the nature, attractiveness and character of such villages should be preserved. The definition would have to be tight otherwise loopholes would allow development that would not be in keeping with the locality. But this would be hand in hand with, and supportive of, clearly defined village confines.</p> <p>It is inevitable that textual definitions in village situations will be disputed which is why that approach is not recommended for general application. Instead, it is for local communities through Neighbourhood Plans and Village Design Statements, on advice from planning officers and other professionals where appropriate, to define where the confines are. This is not overly restrictive because there are policies that provide for the confines to be overruled in certain circumstances, subject to local agreement.</p>
Crick Parish Council	Option C		Crick has had a line boundary for some years. It is believed that this is the clearest way to designate village confines and should be used for all villages that wish to designate their village in this way.
Gladman- various sites			<p>The characteristics that define the 'confines' of a settlement will vary from settlement to settlement and as such Gladman do not believe that seeking to define the confines on this basis is a robust approach that adequately takes into account the unique character and context of each settlement. Instead, as with our answer to question 14, Gladman believe that there is no need to apply a settlement boundary policy (defined either on a map or in the text) as development on the edge of settlements in the rural area should be judged on the basis of whether or not it is sustainable in terms of the criteria set out in the Framework. Creating a hard-and-fast settlement boundary in effect creates a 'presumption against development' in areas adjacent to Daventry but outside the boundary; Gladman recommend that this policy needs to be significantly revised to provide a more permissive approach to development. We suggest the following rewording to this element of the policy:</p> <p>"Development in the Open Countryside adjacent to existing settlements will be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development."</p> <p>This approach would enable an assessment to be performed on a site-by-site basis as part of the planning balance exercise and the Council would still be able to refuse harmful development.</p>
Daventry Town Council	Option D	Yes	
Mr and Mrs Clayton, Marley Farm, Byfield (Framptons)	Option B		
Barry Howard Homes, Land at Cold Ashby (Framptons)	Option B		
Framptons	Option B		
Barry Howard Homes, Land at Clay Coton (Framptons)	Option B		
Brown Developments, Land at Weedon (Framptons)	Option B		
Geoff Pullin (Resident-Badby)			Don't know. Nowhere should be constrained from small increases.
Great Oxendon Parish Council	Option C	No	Plan based units to development
Guilsborough Parish Council	Option C	Yes	Needs to be led by a neighbourhood plan

Home Builders Federation			However it is also suggested that proposed settlement boundaries should not be drawn too tightly thereby inhibiting flexibility for alternative sustainable developments coming forward if any unforeseen problems occur with existing consents and / or strategic site allocations as the Council has experienced at the North East Daventry SUE.
Nikolas Moore (resident - Boughton)	Option C		
Overstone Parish Council	Option C	Yes	
Moulton Parish Council	Option C	Yes	
Francis Jackson Homes	Option C	Yes	
Weedon Bec Parish Council	Option C	Yes	No view
Maidwell with Draughton Parish Council	Option C	No	The drawing of village confines should be determined by village residents, wherever possible, but within the criteria proposed in para 6.11, and then be submitted for approval.

#### Issue 28- The Rural Economy- Policy R2

Q28a. It is intended that the Local Plan will include further detailed policies on the rural economy. What should it include?			
Q28b. Are particular types of business particularly suitable for, or unsuitable for, different areas of the District? If so, how could the Local Plan address these?			
Q28c. Are there forms of development that would be generally acceptable in the District, or parts of it, which currently require planning permission but the need for this could reasonably be dispensed with through a Local Development Order?			
Name	Response		
	28a	28b	28c
Ancer Spa Ltd on behalf of London Metric Property plc	<p>The West Northamptonshire Joint Core Strategy is too simplistic in relation to its employment land spatial distribution policies which general categorise sites as either urban or rural. It does not take into account the existing employment locations such as Crick Industrial Estate that are neither urban nor rural. Crick Industrial Estate is a strategic employment asset to the County and District and change should be allowed to modernise and expand to fulfill its potential increase of 750 jobs, GVA and business rates. It is a sustainable location given its proximity to services in Crick village centre, local hotels and regular bus services.</p> <p>Policy R2 should accordingly recognise that there are significant employment areas at the Primary Service Villages of Crick, Brixworth, Woodford and Weedon. These areas can make a significant contribution to the growth of the West Northamptonshire and Daventry economy, whether through expansions of indigenous businesses or attraction of inward investment, and consequently should not be unduly constrained by</p>	<p>The Crick Industrial Estate close to Junction 18 of the M1 motorway is a strategic location particularly suitable for storage &amp; distribution uses and also manufacturing uses that require good 'just in time' access for import and export of materials and products.</p> <p>There is good differentiation with DIRFT by providing land for smaller units and for businesses that do not require rail access</p>	

	<p>rural constraint policies. Sustainable extensions of these employment areas should be permitted.</p> <p>Therefore an additional criterion should be added to Policy R2 concerning the following types of development that would be acceptable in rural areas as follows: 'Redevelopment and sustainable extension of established employment areas near Primary Service Villages.'</p>		
Barby and Onley Parish Council	<p>Please can you ensure that future planning policy does not allow businesses such as village shops or pubs etc. to be closed and revert to domestic dwellings without being subject to planning consent.</p> <p>It is important for parishes to be made aware if community assets are likely to be closing, and to have some warning via the planning process of what is planned.</p>		
Boughton Parish Council	<p>Rural regeneration Utilising brown field sites before green field land Valuing Daventry District's natural and historic environment Protecting existing facilities and services to meet the day to day needs of local communities Promoting sustainable transport</p>		
Braunston Parish Council	<p>as R2 We would like any business development in the villages is appropriate in size, scale and type.</p>		
Church with Chapel Brampton Parish Council	<p>Better quality of development- particularly equestrian buildings and landscaping to avoid present eyesores on the landscape</p>	Office and small manufacturing in redundant agricultural buildings	No
CPRE	<p>Modest-scale and proportionate businesses that support key rural industries such as agriculture, forestry, leisure, tourism, rural community support and rural heritage.</p>	Some businesses will need to be close to their target audience, for example, boat repair and canal leisure provision will be appropriate when close to waterways.	Without guidance as to what might be suitable, it is not possible to answer.
Gladman – various sites	<p>We believe that the Plan should be ambitious in seeking to achieve higher levels of economic growth, and that any possible risks of planning for a corresponding high level of housing are vastly outweighed by the potential benefits.</p> <p>Failure to allocate enough housing, or housing in the right locations, will jeopardise the ability of the Plan to deliver the economic aspirations of the LEP, as it could endanger the ability to attract and retain a mixed and balanced workforce. Failure to address issues of housing affordability could mean that potential</p>		

	<p>workers will not be able to live in the area, necessitating longer commutes or simply an out-migration to more affordable areas elsewhere. If younger working-age people cannot afford housing then Daventry's workforce will gradually age and the overall number of working-age residents decline.</p> <p>New housing is also an important driver of economic growth in its own right. Not only does it create additional consumers for goods and services within Daventry district, it also creates jobs in the construction industry and within the associated supply chain.</p> <p>As previously noted, the Government's 10-point plan for boosting productivity in rural areas wants to make it easier for people to live and work in rural areas, and any policies on the rural economy should support its aims and objectives.</p> <p>Paragraph 18 of the Framework makes it clear that that the Government wants to ensure that 'the planning system does everything it can to support sustainable economic growth' and that planning should operate to encourage and not act as an impediment to sustainable growth'. It concludes 'significant weight should be placed on the need to support economic growth through the planning system'. The draft Plan should ensure its housing policies fully support this requirement by planning for the higher rate of economic growth.</p>		
Daventry Town Council	Improved transport links between strategic sites and key residential areas (town)	Location of business should be commercially driven and decisions made on planning terms.	Development should be decided on its own merit and through a prescriptive process.
Geoff Pullin (Resident-Badby)	R2b doesn't seem to be very successful with small farmer owned wind generators!		
Great Oxendon Parish Council	Infrastructure issues for homeworking	Industrial processed in rural areas i.e. anaerobic digestion plant	
Guilsborough Parish Council	The peace, tranquility and rural character of the rural areas should be preserved. This includes avoiding the negative impacts of noise, vibrations, visual intrusion and increased traffic. Normally any diversification should be of a small scale and in keeping with the local area. The existence of existing developments such as solar farms, wind turbines, communication masts, exception sites (e.g. GP surgeries) should not be given weight or encourage other similar development in the countryside.	Small scale development in keeping with the local area, and where neighbourhood plan led, and where the majority of jobs are likely to be from the immediate locality.	
Moulton	Within rural areas, suitable opportunities may exist	Q28a refers	

College (Turley)	<p>for a range of developments beyond those specified in JCS Policy R2.</p> <p>This could include appropriate recreation, tourism, leisure or education facilities for example particularly where this is allied to existing rural businesses and activities. Such development can, if suitably located and designed, contribute to the aims of sustainable economic development, and specifically help deliver Objectives 8 and 11 of the Local Plan which seek to enhance opportunities for educational attainment and rural diversification.</p> <p>There is a specific need to expand Policy R2 (g) to allow for 'agri-food' activities alongside the more traditional rural activities of agriculture, forestry and equestrian activities. 'Agri-food' encompasses a range of production, processing and supply chain research related activity and seeks to advance more effective, productive and environmentally beneficial farming systems. It is a highly valuable aspect of the rural economy, and is reliant on rural locations and rural land to fulfill its purpose.</p>		
The DM Wood Wills Trust (Berry Bros)	<p>Policy R2 of the West Northants Joint Core Strategy at part e) supports the expansion of businesses in their existing locations dependent on the nature of the activities involved, the character of the site and its accessibility. As part of developing that policy in the part 2 Local Plan and providing clarity and certainty for rural business locations we request that land to the north of the existing employment site at Brixworth is allocated for the future expansion. This expansion area could provide for existing industries to expand or other related industries to locate.</p>		
Welford Parish Council			No
Welton Parish Council	<p>Full coverage of R2 in more detail.</p>	<p>Businesses that cause serious congestion, noise/air pollution and other forms of pollution should not be permitted. Waste disposal facilities would be an example. Small scale businesses which also meet local employment needs would be beneficial for rural communities and would reduce commuting.</p>	
Badby Parish Council	<p>Better broadband provision and mobile phone reception should be part of the infrastructure.</p>		
Scaldwell Parish Council		<p>Yes -as stated in Policy R2-Rural Economy -page 49 of 'Issues and Options Consultation'.</p>	No
David George (resident - Kilsby)	<p>Encouragement for all rural business</p>	<p>Effort should be made to attract more manufacturing.</p>	<p>Small extensions, conservatories and outbuildings for domestic properties.</p>
Hollowell and Teeton Parish	<p>Noise, Waste, Transport &amp; Environmental Impact</p>	<p>Set Criteria for Environmental Impact. e.g. No HGVs on single carriageway / unclassified roads</p>	No

Council			
Francis Jackson Homes	For DDC to determine as part of this process.	Can the Part 2 plan be this prescriptive? Should it be?	
Weedon Bec Parish Council	Generally no but a single large employer in a small parish with limited housing and poor connectivity would cause problems due to pressure on infrastructure/services		
Maidwell with Draughton Parish Council	The current policies seem sensible.	Businesses that sit well in a rural environment are suitable.	No, local development orders should not override existing planning application processes.

### Issue 29 – Existing Employment Areas- Rural Areas

Q29a. The employment areas for Brixworth, Crick, Weedon and Woodford are mapped in Appendix C. Are these defined correctly? Q29b. If no please indicate how they should be changed?		
Name	Response	
	29a	29b
Ancer Spa Ltd on behalf of London Metric Property plc	No	<p>The employment area of Crick should be amended to allow the sustainable extension of Daventry Industrial Estate at Land south of Eldon Way. This will comprise four fields immediately to the east of the M1 motorway and extending down to the bridlepath EM12. See attached Appendix 1 plan showing the proposed extension.</p> <p>The employment area can be extended at Land South of Eldon Way without a significant adverse effect upon the environment of the village of Crick. The land would be separated and screened from the village by existing allotments and two other fields, together with new landscaping.</p> <p>There is high demand for development of the land comprising this extension. (see our 'Call for Sites' submission) at this strategic location close to Junction 18 of the M1. This includes interest from XPO Logistics who occupy a warehouse on adjoining land in expanding onto part of the site.</p> <p>This allocation would complement and not compete with the nearby DIRFT III as it would attract a different type and size of occupier and is more suited to providing accommodation for local businesses wishing to expand.</p>
Brixworth Neighbourhood Plan Steering Group	Yes	(Brixworth)
Chris Myers (Resident- Long Buckby)	No	Brixworth, Crick, Weedon and Woodford are identified. I believe that Long Buckby has a significant role to play in providing employment and has dedicated areas either side of the railway line near the station.
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	But should Weedon Barracks/Depot be included?
Crick Parish Council	No	The map in Appendix C showing DIRFT includes as part of the 'employment area' of Crick the land that has the 2 new wind turbines on it just past the motorway bridge traveling towards Rugby. This is currently green field and should be retained as part of the separation of DIRFT from Crick village. Additionally land the East of the road to the Costco site is shown as in the 'employment area'. Further in relation to 6.17 it is not the parish Council's view that the employment area does play 'an important role in helping to sustain the rural economy' as it is believed that few people from the village work there and that little income flows into the village from the site.

Daventry Town Council		Unable to comment
Badby Parish Council	Yes	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Weedon Bec Parish Council	No	There is now significant employment and small business at the Depot and this should be included as it seems likely to increase. This would make an ideal site for a mixed development with some of the elements described at 28 + buildings adapted for housing and housing on some of the flat land that is not integral to the site eg rear of buildings to north with access on to Harmans Way.
Maidwell with Draughton Parish Council	Yes	

### Issue 30- Rural Economy specific sites

Q30a. Further to Policy BN6, should the plan include policies for bringing any other specific historic sites in the District back into use? Q30b. If yes, please specify which site and why and submit a call for sites form.		
Name	Response	
	30a	30b
Braunston Parish Council	No	
Brixworth Neighbourhood Plan Steering Group	No	
Church with Chapel Brampton Parish Council	No	
Daventry Town Council		Unable to comment
Mark Wesley (resident - Daventry) (resident - Daventry)		I am pleased if nay sites are brought back into use. It makes for an interesting place.
Long Buckby Parish Council	No	
Staverton Parish Council	No	
Althorpe Estates (Lucas Land Planning)	Yes	The Althorp Estate is the custodian of many historic properties, buildings and buildings in conservation areas. What is needed at the District Planning level is an understanding of the significant costs owners have to face in retaining and maintaining the attractive landscapes and built environment of the District.

		We use the example of St John's Church spire in Brington - which is a monument for which there is no current use, yet which has had substantial sums spent on upkeep and restoration. The Estate requests that planning policy is used sensitively and flexibly, allowing some scope for innovation.
Tony Dodd (resident - Welton)	No	
Welford Parish Council	No	
Welton Parish Council	Yes	
Badby Parish Council	No	
David George (resident - Kilsby)	No	
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	no	
Francis Jackson Homes	No	
Weedon Bec Parish Council	Yes	The Depot & Blast Houses at Weedon but unfortunately the parish does not own them and cannot submit a call for sites! Both these sites are brownfield land and DDC should take a lead in promoting them with appropriate incentives as well as promoting their heritage & historic development. A Conservation heritage appraisal is urgently needed with strategic policies to promote development
Maidwell with Draughton Parish Council	No	We are not aware of specific historic sites that need to be brought back into use. The lime kilns to the north of Maidwell and the historic fish ponds to the south west of Maidwell should be preserved.

### Issue 31- Rural Transport- Policy R3

Q31a. Further to policy R3 of the WNJCS it is not considered necessary for this Local Plan to include an additional policy on rural transport. Do you agree?  
Q31b. If no, please indicate what the plan should include.

Name	Response	
	31a	31b
Anthony Davies (resident - Welton)	No	Improvements to cycling network AND provision for maintenance of the network
Boughton Parish Council	No	Maintaining and improving the condition of local roads Provision of Park & Ride3 sites to improve access to town centres Reduced speed limits on rural roads to improve road safety
Braunston Parish Council	No	We would like an addition policy
Brixworth Neighbourhood Plan Steering Group	Yes	

Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	Please note that the County Connect initiative has provided a lifeline in small villages, particularly where the circumstances of individuals changes, perhaps through illness or injury. The policies should encourage this kind of service.
Gladman- various sites	Yes	Gladman consider that it is not necessary to replicate or elaborate on policies that are in line with those contained in national policy and guidance. Gladman remind the Council of the guidance contained within PPG (Reference ID: 12-010-20140306), which states that: In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework. We would add that the delivery of new housing in rural areas can help stimulate demand for and ensure the viability of rural public transport which supports the generally aims of policy R3.
Framptons	No	Include an emphasis on providing demand services where appropriate in rural areas. To be considered on a site by site basis.
Geoff Pullin (Resident- Badby)		But how will it all be funded? There has been little to no progress on cycleways alongside our increasingly dangerous undersized roads - eg A361 south, not even along the A45 Dav to Weedon where there is plenty of verge and a tiny overgrown path. Is it DDC or NCC's job?  Parking in villages? There needs to be some fundamental way of clearing the streets, making better use of existing off-road parking and providing more off-road parking. Are 'village greens' too important?  What about providing helicopter pads in villages for the Air Ambulance because soon the road ambulance won't be able to make it even if it was available?
Great Oxendon Parish Council	No	Improved safety in rural areas through traffic calming measures and enforcement of 'minimal' speed limits i.e. 30 mph in village centres
Guilsborough Parish Council	Yes	
Kilsby NDP Steering Group for Kilsby Parish Council	No	Paragraph 6.22 recognises the impact of congestion on inter-urban routes for villages and the rural areas. This is a huge issue for Kilsby and the policies in R3 do not address this specifically. We believe there should be an additional policy on this.
Naseby Parish Council	Yes	
Persimmon Homes		The enhancement of the rural transport system should allow for a greater number of settlements within the district to enhance their level of sustainability meaning further housing development is a practicality.
Ravensthorpe Parish Council	No	There should be a much greater emphasis on scheduled bus services linking all rural settlements to: - important facilities located in rural areas (GP surgery, Post Office, general food store etc) - local towns (commuting workers, students, access to employment and shopping areas) - scheduled rail links  On demand services do not meet the needs of rural communities as they are frequently not available when required.  Without access to scheduled bus services at the times required throughout the working days, car use will continue to increase, and social exclusion, for those without access to a private car, will not be addressed.
Long Buckby Parish Council	Yes	Policy to address transport provision in large villages where the centre and facilities are too far to walk from the edges of the village and with inadequate parking at the centre for the number of inhabitants.

Staverton Parish Council	No	Do not cut off rural areas' transport. Better connection between villages required. The local plan can protect and enhance current services.
Farthingstone Parish Council	Yes	The plan wording will suffice but the County Connect initiative provides a vital lifeline in small villages, particularly when circumstances change, perhaps through injury or illness such that the car is not a viable option for the individual. The policies should therefore encourage this kind of service.
Althorpe Estates (Lucas Land Planning)		We note this aspect under Issue 20 above, please  Paragraph 6.22 of the draft text is interesting: we would be pleased to be made aware of the "different approaches"- yet none are mentioned and some information on these in the plan would be useful as discussion points.
Tony Dodd (resident - Welton)	No	The removal of subsidised transport (bus, trains etc.) will result in greater reliance upon private methods. Accessing district facilities (education, shops, health, sporting, leisure etc.) cannot be blocked by rigorous adoption of "modal shift" policies when there is no alternative.  Review and support facilities for walking between settlements.  Adoption of 20mph limits in village central areas (with enforcement).  Imposition of 7.5 tonne weight restrictions in villages and subsequent enforcement.
Welford Parish Council	No	The Plan should include a statement of minimum public transport provision to qualify for meeting any sustainability test. Many villages have no meaningful or entirely inappropriate public transport and there is little interface with the County Council. The quality of services needs a quantifiable definition.  Cross boundary public transport trips are impossible yet many locations are closer to neighbouring towns e.g. Lutterworth, Rugby, Market Harborough. From the north of the County there is only a 1.5 hour trip to Northampton available (and not used).
Welton Parish Council	No	Support for rural communities in their efforts to deal with speeding in 30mph zones, especially rat runs. Close liaison with Northants Police in view of its recent initiatives to tackle speeding in rural areas. Close liaison with Northamptonshire Highways on road safety and traffic calming measures. Review walking connections between villages and between villages and Daventry.
Northamptonshire County Council (Planning Services)		The Part 2a Plan may need to expand upon Policy R3 of the Part 1 Core Strategy depending on where housing is allocated within this Plan, as that might create some as yet unknown traffic issues.
Badby Parish Council	Yes	
Scaldwell Parish Council	No	Rural transport i.e. public bus services is crucial to the survival of many villages and greater emphasis should be placed on this over and above cycle ways or walking connections. Also, more should be included on the management of traffic through villages whilst maintaining their character.
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Overstone Parish Council	Yes	

Moulton Parish Council	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	No	Demand operated services like County Connect are not the answer to rural transport; they mark people out as different or disabled and young people especially object to this. There should be investment in more and better public transport particularly for people to get to work and commuter stations. Please refer to comments at 20 about the impossibility of getting to DIRFT from our locality. Better connectivity especially of rural bus services should be explored e.g. the fast D1/2 bus through Weedon does not connect with the slower D3 and the distance to the Globe/Tesco bus stop is too far to walk for most thus there is no fast bus transport to Northampton for the majority of Weedon residents. How about a park & ride at Weedon to pick up the D1/2 to Northampton?
Maidwell with Draughton Parish Council	Yes	

### Issue 32- Landscape

<p>Q32a. What landscape characterisation would be appropriate in the District having regard to the NPPF?  Q32b. What evidence would be required to support such a designation?  Q32c. What is an appropriate starting point for such a designation? (tick one box only)  Option A- Existing Evidence  Option B- Existing designations  Option C- Combination of A and B  Option D- Other, please specify  Q32d. If you selected option D, please specify</p>				
Name	Response			
	32a	32b	32c	32d
Boughton Parish Council			Option C	
BRANE, Brixworth - Bob Chattaway	Local landscape surveys undertaken for neighbourhood Plans, appeal decisions etc. should be co-ordinated and used to review the SLA which should be continued to guide developers to the least sensitive landscape & environmental areas within the district.	Local landscape surveys undertaken for neighbourhood Plans, appeal decisions etc. should be co-ordinated and used to review the SLA which should be continued to guide developers to the least sensitive landscape & environmental areas within the district.		Local landscape surveys undertaken for neighbourhood Plans, appeal decisions etc. should be co-ordinated and used to review the SLA which should be continued to guide developers to the least sensitive landscape & environmental areas within the district.
Braunston Parish Council	West Northamptonshire Uplands	Northamptonshire Environmental Character Assessment <a href="http://www.rnrpenvironmentalcharacter.org.uk/">http://www.rnrpenvironmentalcharacter.org.uk/</a>	Option A	
Brixworth Neighbourhood Plan Steering Group	The Special Landscape Area definition has stood the test of time and it is unclear what could replace it. Definitions of High Sensitivity could be useful additional supporting evidence, but this becomes more subjective and runs the risk of disagreement between professional advisers.	Independent review by consultations of historical records, inspector's decision and audit and review of land sensitivity. Also evidence of support from local community. Land sensitivity should take into account preservation of desirable skylines and hill top settings.	Option C	
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)			Option A	
Church with Chapel Brampton Parish Council	No further or expansion into open countryside around smaller villages and leave open	To protect against urban sprawl	Option B	

	countryside on the outskirts of major developments			
CPRE	The geological and topographical nature of the landscape would be helpful, but there also needs to be recognition of scenic value and of tranquillity (which should be preserved). It may not follow that poor soil types are suitable for development. For example, heathland may not be common in an area and may therefore need to be protected from development.	Factual, for example, geology and topography, and subjective assessments, for example ranking on a scale of 1 to 10 for beauty and also for tranquillity.	Option D	There should be a combination of A and B plus subjective scoring for both beauty/scenic value and tranquillity as these may not always be taken into account under the proposed classifications.
Crick Parish Council		The policy should start by accepting existing designations as nothing has changed to affect them and then should use existing evidence for new designations (like the Northamptonshire Environmental Character Assessment) but also be ready to accept future evidence for further designations as it becomes available. The NECA is itself a fairly recent piece of evidence.	Option C	
Daventry Town Council	Unable to comment			
Geoff Pullin (Resident-Badby)	Not sure how these effect legal operation. There is a need to be able to require replanting of trees where they are becoming old and falling down - like Badby Down.			
Great Oxendon Parish Council	As outlined on p52, para 7.1	Mapped- backed by photographs	Option A	
Guilsborough Parish Council	Retain, update and strengthen the Special Landscape Area as the prime landscape designation. SLA's do need to support small scale rural economic development but only where this is promoted by a neighbourhood plan. Large wind turbines, bio-gas and solar farms are not compatible with the SLAs and also should be removed from the SLA once the initial period of operation is over	See 32a	Option C and D	Neighbourhood Plan inform areas of local landscape importance
Northamptonshire County Council (Heather Webb)		Since the Northamptonshire Environmental Character Assessment was completed in 2006 the Campaign to Protect Rural England (CPRE) has done extensive work on mapping tranquillity at national and county levels. <sup>2,3</sup> This information was incorporated into the landscape theme of the countywide GI analysis mentioned above. With such a large rural hinterland Daventry enjoys larger areas of greater tranquillity than many other parts of the county. Tranquillity contributes to the experience of landscape and the CPRE work should be included as evidence in the determination of any new landscape designations within the district.		
Historic England		The European Landscape Convention related to all types of landscape and the management of the landscape should involve protection and management of the best areas and the enhancement of other areas. In recent years, a	Option C	

		character – based approach has been adopted e.g. the Environmental Character of Northamptonshire, which includes the county Historic Landscape Characterisation (HLC). This work provides the basis for landscape sensitivity studies, which can help to determine the best location of development. The HLC and county Historic Environment Record can be used to identify more local historic landscape features, such as areas of ridge and furrow and ancient hedgerows. Registered parks and gardens, of which there are 11 in Daventry District, Naseby Battlefield and Ancient Woodland are also landscape areas of historic importance.		
Northamptonshire County Council (Planning Services)	Special Landscape Area designations have already been deleted across the four North Northamptonshire authorities. The County Council, in its role as minerals and waste planning authority and where the policies of district local plans can sometimes come into play in determining minerals and waste applications, would not be supportive of the continuation of a Special Landscape Area designation within Daventry district unless such a designation had substantial justification for its continuance and was focussed on those areas of the district that truly had a landscape that could be considered to be 'special'.			
Badby Parish Council	Paragraph 7.3 on page 52.	The Parish Council is unsure what evidence is available.	Option C	
Scaldwell Parish Council			Option C	
David George (resident - Kilsby)	Pastoral.	Photographs, maps, aerial surveys.	Option B	
Hollowell and Teeton Parish Council	Historic/visual	Records	Option C	
Francis Jackson Homes	Landscape designations must be criteria based - as set out in the NPPF. This is national policy so must be accorded with - the current landscape policies pre-date these and have no criteria based evidence or support, therefore are deemed wholly out of date.	As set out above, criteria based policies, based on local assessments.	Option D	Existing evidence is nearly 20 years old and is not compliant with current national planning policy. Rather than reprising this old work, is it not better to start afresh and look at specific up to date criteria from the outset, not rely on with work of a generation ago?
Weedon Bec Parish Council	Landscape should be considered at a more local level e.g. Local green space particularly where there is not a Neighbourhood Plan in place to address this. Ask residents what land/views are important to them and designate as local green space. There needs to be a category of landscape between the very small i.e. local green space - a special definition & the bigger i.e. special landscape area - a qualitative definition. Much land falls into this indeterminate category but acts as an important	Similar to that which defines a public right of way is usage but also the opinions of local residents + historical/heritage assessment.	Option C	

	buffer between settlements and contributes to important and much valued views; the latter should be defined so that the setting of settlements is recognised and preserved.			
Maidwell with Draughton Parish Council	As described in para 7.3	The descriptions used in National Character Areas	Option C	

### Issue 33 – Historic Environment- policy BN5

Q33a. Are there any other locally specific policies required to protect and enhance Daventry District’s historic assets in addition to the policies on the historic environment in the NPPF and the Joint Core Strategy? Q33b. If yes what should they say? Q33c. Is there a case for producing a list of buildings of local architectural or historic importance? Q33d. Do local heritage assets need a specific policy in the local plan?				
Name	Response			
	33a	33b	33c	33d
Boughton Parish Council	No		Yes	Yes
BRANE, Brixworth - Bob Chattaway			Yes – sites and buildings and views to and from them	Yes – sites and buildings and views to and from them
Braunston Parish Council	Yes	Canal network, ridge and furrow	Yes	Yes
Brixworth Neighbourhood Plan Steering Group	No			
Church with Chapel Brampton Parish Council	No		Yes	Yes
CPRE	Yes	There should be explicit recognition that non-designated heritage assets can be recognised at the time of consideration of a planning application. This is because it is impossible to list every asset of local or archaeological importance. Evidence may come to light because of research relating to a planning application and assets. An example is ridge and furrow earthworks which may only come into focus when a planning application is made. Another example is a building where matters of historical interest emerge when the building is affected by an application.	Yes	Yes
Crick Parish Council	No	No further requirement subject to provision for listing.	The NPPF and JCS provide guidance to identify non-designated assets but it is unhelpful to have debates about whether any particular asset qualifies at the time of proposed development. The compilation of a definitive list (probably requiring Parish Council input) would be useful to allow proposed development to realise that there is an asset that needs	No other than the provisions for listing and its effect.

			to be considered at an early stage of the design process rather than having to seek to make amendments at a later stage when an objection arises.	
Gladman – various sites	No	<p>Gladman consider that it is not necessary to replicate or elaborate on policies that are in line with those contained in national policy and guidance. Gladman remind the Council of the guidance contained within PPG (Reference ID: 12-010-20140306), which states that:</p> <p>In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.</p> <p>Paragraph 132 of the Framework makes clear that great weight should be given to a heritage asset’s conservation and that ‘the more important the asset, the greater the weight should be’.</p> <p>For designated heritage assets, paragraph 133 requires that where a development will cause substantial harm, permission should be refused unless the substantial harm is necessary to achieve substantial public benefits.</p> <p>Where the harm is less than substantial, then paragraph 134 requires that the ‘harm should be weighed against the public benefits of the proposal’.</p> <p>For non-designated heritage assets, ‘a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.’</p>		
Daventry Town Council	No		Yes	Yes
Geoff Pullin (Resident-Badby)		Is the Dower House in Fawsley Park on the asset register?		
Great Oxendon Parish Council	No		Yes	Yes
Guilsborough Parish Council	Yes	Locally important areas as identified through neighbourhood plans	Yes	Yes
Historic England		<p>The Evidence base in relation to heritage assets is not clear. The evidence base is critical to the preparation of a Local Plan in accordance with paragraph 169 and 10 of the NPPF. Particularly relevant to site and allocations and designations could include the following;</p> <ul style="list-style-type: none"> <li>-updating conservation area appraisals</li> <li>-undertaking characterisation studies</li> <li>-producing setting studies – of specific settlements, or specific heritage assets</li> <li>-local lists</li> <li>-Assessments of landscape sensitivity</li> </ul> <p>If these have been carried out it would be helpful to make their location clearer.</p>	A local list would be strongly welcomed. The NPPF within paragraph 169 states that local planning authorities should have up-to-date evidence about the historic environment to use to assess the significance of heritage assets and the contribution they make to their environment.	A specific policy is recommended in order to fully ensure locally listed buildings are protected within policy, An example policy could read; <i>Throughout Daventry district there are a number of buildings and structures of historic and architectural significance that, whilst not statutorily protected, help create the locally distinctive character of the area. The Council recognises the positive contribution these structures make to streetscape and / or landscape and will therefore designate such assets through the Local List to strengthen the presumption in favour of their retention when considering development proposals.</i>

				<p><i>Development which would remove, harm or undermine the significance of a locally listed asset, or its contribution to the character of the area, will only be permitted where robust evidence can demonstrate that the public benefits of the development would clearly outweigh the harm.</i></p> <p><i>A number of buildings on the Local List have also been included on the basis that together, and sometimes alongside statutory listed heritage assets, they make a particularly strong and positive contribution to the 'townscape' character of an area. These 'key townscape frontages' are identified on the ???</i></p> <p><i>Development proposals which would erode the significance of these frontages will be resisted.</i></p> <p><i>Only in exceptional circumstances will the loss of a locally listed asset be permitted. Where this is the case the following may be required:</i></p> <ul style="list-style-type: none"> <li><i>-an appropriate level of survey and recording which may also include archaeological excavation;</i></li> <li><i>-provision of replacement buildings of comparable quality and design</i></li> <li><i>-the salvage and res-use within the replacement development of special features.</i></li> </ul> <p><i>This is an example only for guidance purposes and would obviously depend on the specific circumstances (such as 'key townscape frontages')</i></p>
Scaldwell Parish Council			Yes	Yes
David George (resident - Kilsby)	No		Yes	Yes
Hollowell and Teeton Parish Council	No		Yes	Yes
Nikolas Moore (resident - Boughton)	No		Yes	Yes
Overstone Parish Council	No		Yes	Yes
Moulton Parish Council	No		Yes	Yes
Francis Jackson Homes	No		No	No
Weedon Bec Parish Council	Yes	Specific policies for the Blast Houses & Depot at Weedon to ensure that options are preserved for access to and within the site to make them more attractive for development	Yes	Yes
Maidwell with Draughton Parish Council		No, see answer to question 30 above.	Yes	Yes

**Issue 34 – Northampton and Daventry Fringe**

Q34a. It is considered that there is a case for a policy designation for the fringe of Northampton and Daventry. Do you agree? Q34b. If yes, what form should it take? A. Defined area B. Criteria based policy Q34c. What should that policy include? Q34d. How should areas be defined?				
Name	Response			
	34a	34b	34c	34d
Anthony Davies (resident - Welton)	Yes	Yes	Without such policy we will get more of the exceptions like Micklewell where identifying an anomaly (after permission) allows boundaries to be changed	
Boughton Parish Council	Yes	Yes	Designation of important open spaces The Green Wedge Local Plan Saved Policy EN10 designation should continue. This is an important policy and should be carried forward in to the WNJCS.	
Braunston Parish Council	Yes		Yes. We'd like this policy to include a distinct area of separation between the town, and the villages which encircle it. Green belt designation would assist.	Marking on a map
Brixworth Neighbourhood Plan Steering Group	Yes	Option B	Should include importance of green wedges and improved road infrastructure	
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)	No		We request that the current Green Wedge policy is deleted. Green Wedge is not a strategic policy, and there is no reference to them in the WNJCS. Paragraph 157 of the NPPF does allow Local Plans to identify land where development would be inappropriate (bp.7), but within the context of also meeting the development and infrastructure needs of an area (bp.1). The Green Wedge boundaries were defined in the 1997 Local Plan in the context of meeting development needs up to 2006. Paragraph 113 of the NPPF is clear that criteria-based policies are preferred for ecological and landscape designations, and that different levels of protection are required depending on the relative importance of areas. The ecological or landscape importance of land currently designated as Green Wedge will need to be reassessed and re-designated accordingly if appropriate.	We request that Green Wedge policy areas are deleted. The landscape and ecological importance of land currently located on the fringe between Northampton and Moulton will need to be reassessed, and re-designated accordingly subject to the findings of surveys.  In the case of our client's site at land south of Boughton Road in Moulton, the Landscape & Visual Impact Assessment undertaken for the site concluded that the development of a small scale, low rise and high quality housing scheme to the west of Moulton may be readily assimilated into the landscape character of the wider area, provided the proposed mitigation measures dealing with green infrastructure, biodiversity and lighting are implemented. The assessment also concluded that the majority of the current Green Wedge designation would be retained and is unaffected by the proposed development at the site.  Furthermore, the draft Moulton NDP proposes to allocate land south of Boughton Road in Moulton for 125 dwellings, thus removing it from the Green Wedge policy designation (see draft MNDP Policy H6).
Church with Chapel Brampton Parish Council	Yes	Yes		
CPRE	Yes	Option A and B	Areas of scenic and/or recreational and/or tranquillity value	By geographical area and by characteristics (see Q34b)

Gladman – various sites	No		Gladman do not consider it necessary to adopt a policy designation specifically for the fringe areas of Northampton and Daventry. Development proposals in these areas should be judged on whether or not they are sustainable and whether the harm outweighs the benefits when tested against the Framework as a whole.	
Daventry Town Council	Yes	Option B		By experts in town planning and community building
Geoff Pullin (Resident-Badby)			There is a lot of floodable land that needs to be kept very clear of any development except essential roads.	
Great Oxendon Parish Council	Yes	Yes	Protect open countryside to force development of brownfield sites	Map based
Guilsborough Parish Council	Yes	Option B	Focus on a mix of zoned areas; intensive recreation; quiet recreation and green wedges into town centres. Green Wedges to offer walking and cycling routes to the town centres.	See 34c
Northamptonshire County Council (Heather Webb)				Irrespective of type, any urban fringe designation should be informed and defined by up-to-date evidence on the location and nature of high quality green infrastructure assets. This would ensure that the best elements – and concentrations of elements – are recognised and preserved for the enjoyment of current and future residents. The county council's recent GI analysis includes much of this information, which should be considered in a district context along with local knowledge and expertise.
Welton Parish Council	Yes	Option A	Importance of the fringe in preventing coalescence Importance of the fringe to ensure that settlements nearby retain their identity and character Importance of the fringe as a means of recreation for residents in Daventry and Northampton as well as neighbouring villages References to green corridors, biodiversity etc. References to Objectives in 3.3 References to NPPF and WNJCS	Defined on a map
Northamptonshire County Council (Planning Services)			The County Council notes that the consultation document is raising the issue (Issue 34) of whether to use designations in the Northampton and Daventry Fringe to restrict development. In doing so it refers to paragraph 157 of the NPPF as justification for doing so. The relevant paragraph states that local plans should “identify land where development would be inappropriate, for instance because of its environmental or historic significance”. The Local Plan should be careful to ensure it does not over-protect and that the presumption against development in the open countryside is not weakened by a number of other designations covering the open countryside, such as environmental, landscape, green wedge or strategic gap, such that the rest of the open countryside areas become in some way an area of second class protection.  The County Council considers that seeking the creation of a green belt in an area of the country that has not previously had one (as opposed to an extension of an existing one) is not supportable. This is not only because wholly new green belt	

			designations are not made by government and so considerable lobbying would be needed to alter this stance but because of the particular issues of Northampton being a long term growth location and therefore of working out where such green belt would be designated. Green belt is meant to endure and therefore extensive work would need to be carried out to ascertain the extent of the green belt designated area and the areas to be left out of the designation to enable long term growth of the existing urban area. This, as seen elsewhere, is not a simple task and could divert considerable resources for no tangible benefit- it is also the case that a green belt for Northampton would need to be looked at in its entirety and not via a plan that covers about a third of the boundary area.	
Badby Parish Council	No		The Parish Council is unqualified to answer this question.	The Parish Council is unqualified to answer this question.
Scaldwell Parish Council	Yes	Option A	Revisiting the Green Wedge policy	
Environment Agency		Option A		
David George (resident - Kilsby)	Yes	Option A		
Hollowell and Teeton Parish Council	Yes	Option A	Historic / Visual / Amenity	Assessment of extent of area based on set criteria
Nikolas Moore (resident - Boughton)	No		Restrictions on further development on urban fringe particularly where it leads to coalescence of villages into the suburban area of the adjacent town.	The existing suburbs of Northampton in particular and to a lesser extent Daventry as well should be the limit for residential development. There is no justification for any more greenfield development on the urban fringe when there are plentiful brown field sites and other designated sites already available.
Overstone Parish Council	Yes	Option A		Aim to provide a green 'lung' around existing settlements and preserve the historic core of settlement to protect village identity.
Moulton Parish Council	Yes	Option A		Policies should aim to provide a green 'lung' around existing settlements and preserve the historic core of the settlements and protect village identity.  Recent housing developments have created a fragmented boundary to the village and it is important to ensure that the identity and the distinctiveness of the village of Moulton is maintained. A policy is therefore required to respond to the pressures of physical coalescence and to review Policy EN10 (Green Wedge) of the Daventry District Local Plan which was derived some twenty three years ago. Policy EN10 is absent in the adopted West Northamptonshire Joint Core Strategy Plan and MPC are keen to avoid any further physical coalescence with the urban area of Northampton (with the exception of our third site allocation in the NDP). This should form the new boundary on the west of the settlement.- LATE REP
Francis Jackson Homes	No			
Weedon Bec Parish Council	Yes	Option B	Not a prescribed green belt but try asking local residents on the periphery of the town what they value on a day to day basis and define as local green space if small or a 'buffer zone' if	Ideas are at 34d and combine this with what nearby residents want and what they actually use for informal recreation. You will need to ask them!

			bigger. Heritage issues, the setting of buildings and views should be included to define and More 'access' land should be defined - landowners increasingly do not allow informal access.	
Maidwell with Draughton Parish Council	Yes	Option A		As areas where there is a presumption that urban or suburban development should not be supported, to encourage redevelopment and intensification within the built up area.

Q34e. Should the Council, working with its neighbours, explore the option of designating green belt around parts of Northampton and can this be justified in the context of the NPPF?				
Q34f. Please explain your answer				
Name	Response			
	34e	34f		
Boughton Parish Council	Yes			
Brixworth Neighbourhood Plan Steering Group	Yes	Soft edges of settlements – including Northampton and Daventry are desirable		
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)	No	Paragraph 82 of the NPPF states : "...New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions....", and then goes on to identify the criteria for designating a new Green Belt. Any decisions about whether a new Green Belt is required would need to be made through a review of the WNJCS rather than through DS&CLP because it is a strategic and cross-boundary matter. The adopted WNJCS allocates a number of urban extensions at Northampton and also at Daventry, but it makes no mention of a requirement for a Green Belt associated with these developments. No exceptional circumstances were identified at that time to justify designating a new Green Belt boundary, and it is not clear what exceptional circumstances exist now when the urban extensions have already been allocated. The adopted site specific urban extension policies in WNJCA include a requirement for green infrastructure and strategic landscaping to be provided within each development, with strategic landscaping rather than a Green Belt controlling development. Therefore, the designation of a new Green Belt boundary in DS&CLP would not be in general conformity with the adopted WNJCS. Strategic landscaping has been selected as the preferred method to define and control development at the planned urban extensions, rather than a new Green Belt. It is likely that a new Green Belt designation around Northampton would have negative consequences for the delivery of sustainable development, in that development would be directed to locations beyond any Green Belt boundary including the smaller less sustainable villages which are less accessible.		
Church with Chapel Brampton Parish Council	Yes			
CPRE	Yes	It is self evident that the NPPF alone provides inadequate protection for rural areas around Northampton due to the number of speculative developments that gained approval since NPPF came into force where there were ineffective Local Plans. This was despite widespread opposition.		
Daventry Town Council	Yes	Councils should always liaise with their neighbours and constantly be seeking designating and creating green belt and/or open green spaces for the health and well-being of local communities.		
East Northamptonshire District Council	No	It is felt that green belt designation in Northamptonshire would be inappropriate and cause unnecessary confusion. There are alternative forms of countryside protection that the Local Plan could look at if it wishes.		
Geoff Pullin (Resident-Badby)	No	Unnecessary rigid restriction. Ref Q35 below. You need some way of preventing essential agricultural workers from becoming suddenly redundant once the houses are built!		
Great Oxendon Parish Council	Yes	Approach can only be successful if neighbours work together		
Guilsborough Parish Council	No	Green Wedges in line with answer to 34c above.		
Tony Dodd (resident - Welton)	Yes	Residents need to be able to access open space - green belt provides that.		
Welford Parish Council	No	It will simply cause development to jump over the green belt to the rural areas in an unsustainable way.		
Welton Parish Council	Yes	In view of the extent of planned expansion this should be a priority.		

Badby Parish Council	No	The Parish Council is unqualified to answer this question.
Scaldwell Parish Council	Yes	To prevent towns and villages joining up so forming large conurbations as this would lead to loss of open countryside and the corresponding views and amenities. Also, towns and villages would begin to lose their individuality
David George (resident - Kilsby)	Yes	It is important to maintain separation between settlements.
Hollowell and Teeton Parish Council	Yes	To preserve and protect character of settlements
Nikolas Moore (resident - Boughton)	No	The greenbelt around the town has helped preserve the character of the immediately surrounding countryside and villages for many years and the current lack of AFFORDABLE housing should not be used as justification to change the character of these areas for ever, particularly when the reason for the lack of affordable housing is because of the displacement of development from other green belt areas closer to London that seem to have a more vocal and organised opposition to large scale development.
Overstone Parish Council	Yes	
Moulton Parish Council	Yes	
Francis Jackson Homes	No	Northamptonshire is a sustainable location in the national context - why constrain housing in this area in this manner.
Weedon Bec Parish Council	No	No to green belt as it is too prescriptive the emphasis should be on local green space, informal recreation space, access land and connectivity eg cycle paths and horse riding routes, green corridors and the preservation of special heritage landscape and buildings in their setting and landscape which enhances the setting of a village
Maidwell with Draughton Parish Council	Yes	The spread of towns must be limited so as to stop urban sprawl.

### Issue 35 Agricultural Workers Dwellings

Q35 Should the plan include a specific policy to deal with agricultural workers' dwellings?	
Name	Response
Boughton Parish Council	Yes
Braunston Parish Council	Yes
Brixworth Neighbourhood Plan Steering Group	Yes
Church with Chapel Brampton Parish Council	No
CPRE	Yes, there may be a genuine need for dwellings to be near livestock for proper animal welfare reasons, but the policy should prioritise village locations for such dwellings where possible. This is because there are often settlements within easy reach of relevant open countryside and it is preferable to avoid building in the open countryside where possible.
Daventry Town Council	Yes

Geoff Pullin (Resident-Badby)	You need some way of preventing essential agricultural workers from becoming suddenly redundant once the houses are built!
Great Oxendon Parish Council	Yes
Guilsborough Parish Council	Yes
Badby Parish Council	No
Scaldwell Parish Council	Yes
David George (resident - Kilsby)	No
Hollowell and Teeton Parish Council	Yes
Nikolas Moore (resident - Boughton)	Yes
Francis Jackson Homes	Yes
Weedon Bec Parish Council	Yes
Maidwell with Draughton Parish Council	Yes

**Issue 36 – Open Countryside**

<p>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:  A. Re-use or conversion of existing buildings essential for the purposes of employment within the immediate vicinity of the site  B. The replacement of an existing dwelling  Q36a. Do you agree?  Q36b. If not, what else should be included?</p>		
Name	Response	
	36a	36b
Anthony Davies (resident - Welton)	Yes	
Boughton Parish Council	Yes	

BRANE, Brixworth - Bob Chattaway	Yes	
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	Yes	
CC Town Planning- Land at Flore	Yes	It is considered that the existing policy coverage is sufficient in this instance.
Church with Chapel Brampton Parish Council	Yes	
CPRE	No	Agree only in part. It is not a question of including other categories but instead is a principle of limiting the application of A and B. Some buildings have remained derelict for years and may even be barely visible at all. The proposed policy, as written, would allow these do be redeveloped in areas where they may be wholly inappropriate. For example, they could introduce light pollution in otherwise open countryside and would require servicing by roads etc. that might be inappropriate. The policy should therefore be qualified such that development will only be permitted where there is only a marginal impact on infrastructure, light and other pollution.
Crick Parish Council	Yes	The Council believes that an Article 4 direction should be introduced. A carte blanche automatic grant of permission is unhelpful and potentially damaging as rural buildings are often in sensitive areas and development needs to be controlled to ensure the environment and the area is not damaged by either residential or retail use and the proposed development is appropriate to the setting.
Gladman – various sites	No	Gladman do not agree that all development except that which re-uses existing buildings or replaces an existing dwelling should be restricted. As we set out in our response to questions 14, 26 and 27 we do not consider such a blanket restriction of development in the Countryside to be compatible with the Framework and have suggested alternative wording for a policy that is more in line with the general thrust of the Framework.
Daventry Town Council	Yes	
Framptons	No	Should include an assessment of need and be in line with the Council's five year housing land supply.
Geoff Pullin (Resident-Badby)		The permitted development rights are silly - just as much time is wasted in getting clearance than planning permission. Support anything to retrieve the situation. My only criticism is that over zealous specification of materials by planning committees needs to be curbed
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	No	Support for very small rural enterprise that is reliant upon the rural area and in line/led by Neighbourhood Plan.
Scaldwell Parish Council	Yes	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	No	Needs more flexible criteria to allow for re-development of existing buildings that would otherwise fall into disrepair.
Nikolas Moore (resident - Boughton)	Yes	
Overstone Parish Council	Yes	
Moulton Parish Council	Yes	
Francis Jackson Homes	No	There should be reference to what is permissible under permitted development rights, which, whilst exempt from Policy assessment, is nevertheless under the national land use planning system, development permissible per se in the open countryside.
Weedon Bec Parish Council	Yes	

Maidwell with Draughton Parish Council	Yes	
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Q36c. Is there a case for introducing an Article 4 direction to remove permitted development rights for the conversion of agricultural buildings to residential and retail uses, in all or any parts of the District?  
Q36d. Please explain your answer.

Name	Response	
	36c	36d
Anthony Davies (resident - Welton)	Yes	
Boughton Parish Council	Yes	
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	Yes	
CC Town Planning- Land at Flore	No	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	Agree only in part. It is not a question of including other categories but instead is a principle of limiting the application of A and B. Some buildings have remained derelict for years and may even be barely visible at all. The proposed policy, as written, would allow these do be redeveloped in areas where they may be wholly inappropriate. For example, they could introduce light pollution in otherwise open countryside and would require servicing by roads etc. that might be inappropriate. The policy should therefore be qualified such that development will only be permitted where there is only a marginal impact on infrastructure, light and other pollution.
Daventry Town Council	No	Conversions should go through due process and be decided on its merits and feasibility and ensure it is in keeping with existing environment
Framptons	No	Contrary to The Town and Country Planning (General Permitted Development) Order 1995, not policy compliant.
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	Yes	
Kilsby NDP Steering Group for Kilsby Parish Council	Yes	It is essential for the District Planners to be able to control the conversion of agricultural buildings to other uses.
Mark Wesley (resident - Daventry) (resident - Daventry)	No	Site by site decision.
Naseby Parish Council	Yes	Necessary to protect rural communities from inappropriate changes of use.
Ravensthorpe Parish Council	Yes	There is definite case for introducing an Article 4 direction to provide greater control over conversions, in particular, for example, over the conversion of modern agricultural buildings such as steel-framed structures.

Long Buckby Parish Council	Yes	Any such change of use should be subject to scrutiny and challenge within normal planning policies and guidelines.
Staverton Parish Council	No	Leave as it is. Assess individual applications.
Farthingstone Parish Council	Yes	See answer to Q36b.
Althorpe Estates (Lucas Land Planning)	No	
Mr DJS & Mrs SE Wilson (residents – Badby)	Yes	We do not support the uncontrolled re-use of modern farm buildings of no intrinsic historic, architectural or landscape value and regardless also of their setting or the appropriateness of the use.  Utilitarian farm structures and their agricultural uses are part and parcel of country life. Their mere existence cannot justify the encroachment of, for instance, industrial or warehousing uses unrelated to agriculture into the countryside. Such uses and their any employment potential are more properly located on well serviced industrial or warehousing sites specifically provided for the purpose with adequate transport links
Tony Dodd (resident - Welton)	Yes	Agriculture is of local and national importance and must not be neglected, Managed land contributes to the environment, to the landscape character and to our ability to feed ourselves.
Welford Parish Council	Yes	There is a need to retain the agricultural feel of such conversions and they are usually promoted as such. Article 4 is needed to stop subsequent occupiers from destroying the original concept.
Welton Parish Council	Yes	Paramount importance of agriculture in the district. See also 7.13 for justification.
Badby Parish Council	Yes	To protect such areas from creeping development.
Scaldwell Parish Council	Yes	An Article 4 direction may help to prevent the unsuitable conversion of some buildings which would have been to the detriment of the local environment.
David George (resident - Kilsby)	Yes	Better to have the buildings in use.
Hollowell and Teeton Parish Council	No	Needs more flexible approach.
Nikolas Moore (resident - Boughton)	Yes	To prevent the undesirable consequences of a free for all, preventing unwanted and inappropriate development, without the correct checks and balances
Francis Jackson Homes	No	This is national planning policy and facilitated by a Prior Notification system nationally - what justification exists to see to stop that in this District?
Weedon Bec Parish Council	No	It needs to depend on the type of development proposed e.g. if a development contributes to the viability of a farm business then allow; if it contributes to the economic prosperity of the wider community then allow (e.g. Heart of the Shires)
Maidwell with Draughton Parish Council	Yes	But we recognise that farms are having to diversify and that provided conversion falls within normal development criteria it should be permitted.

Q37a. Further to Policy BN2 of the WNJCS it is not considered necessary for this Local Plan to include an additional policy on biodiversity. Do you agree? Q37b. If no please specify what should be included.		
Name	Response	
	37a	37b
Anthony Davies (resident - Welton)	No	We need policies relating to specific sites e.g. it is essential to maintain a wildlife corridor from Daventry Country Park to the open countryside in order to ensure migration of species such as butterflies and small mammals
Boughton Parish Council	Yes	
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	Yes	
Church with Chapel Brampton Parish Council	No	
CPRE	Yes	Note- subject to Natural England's agreement
Gladman – various sites	No	Gladman consider that it is not necessary to replicate or elaborate on policies that are in line with those contained in national policy and guidance. Gladman remind the Council of the guidance contained within PPG (Reference ID: 12-010-20140306), which states that: In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.  Any approach taken should be in line with that set out in section 11 of the Framework. In particular, when formulating policies on biodiversity and geodiversity, 'Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make'.
Daventry Town Council	Yes	
East Northamptonshire District Council		It is also important to ensure effective collaborative working between key partners of shared green infrastructure. The recent Nene Valley Nature Improvement Area (NIA) project should be referred to as a shared land management corridor.
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	Yes	
Northamptonshire County Council (Heather Webb)	No	Daventry District includes a number of ecological features which are special or unique to this part of the county. Acidic soils in particular have created important acid grassland communities of which a small number still exist, primarily on drier hilltops. These soils provide Daventry with the opportunity to incorporate – where ecologically appropriate – these grassland communities and species into larger developments and green infrastructure projects. Daventry is home to the source of the River Nene; this should also be included in a local biodiversity policy especially in view of Joint Core Strategy policy BN8 The River Nene Strategic River Corridor. The importance of the Nene has been recognised in the designation of the Nene Valley Nature Improvement Area (NIA), which covers not only the Nene itself through Flore and Weedon, but also: <ul style="list-style-type: none"> <li>• the northern tributaries extending through Welton and West Haddon and even into Daventry town itself</li> <li>• the Brampton Arm which branches north of Chapel Brampton to Hollowell, Cottesbrook, Maidwell and Old, and surrounds Brixworth and Spratton</li> <li>• the River Ise from Clipston to Arthingworth (Figure 3).</li> </ul>

		<p>The NIA was designated after the Joint Core Strategy was drafted and therefore did not make it into policy BN8. However paragraph 157 of the NPPF states that Local Plans should 'contain a clear strategy for...supporting Nature Improvement Areas where they have been identified'. The Daventry LPP2a should therefore include within a local biodiversity policy a clause supporting the aims and objectives of the NIA.</p> <p>The consultation document refers to the 2009 version of the Northamptonshire Biodiversity Action Plan (BAP). Through the Northamptonshire Local Nature Partnership the BAP is currently being updated. The council should stay current with the progress of the new BAP in order that the most up-to-date version be referenced in the final LPP2a.</p> <p>The NIA was designated after the Joint Core Strategy was drafted and therefore did not make it into policy BN8. However paragraph 157 of the NPPF states that Local Plans should 'contain a clear strategy for...supporting Nature Improvement Areas where they have been identified'. The Daventry LPP2a should therefore include within a local biodiversity policy a clause supporting the aims and objectives of the NIA.</p> <p>The consultation document refers to the 2009 version of the Northamptonshire Biodiversity Action Plan (BAP). Through the Northamptonshire Local Nature Partnership the BAP is currently being updated. The council should stay current with the progress of the new BAP in order that the most up-to-date version be referenced in the final LPP2a.</p>
Kilsby NDP Steering Group for Kilsby Parish Council	Yes	
Naseby Parish Council	Yes	
Natural England	Yes	Policy BN2 of the West Northamptonshire Joint Core Strategy adequately protects existing biodiversity assets through development management. Policy BN1 of the core strategy is also important in securing biodiversity improvements across the district through an enhanced green infrastructure network.
Persimmon Homes	Yes	
Long Buckby Parish Council	Yes	
Staverton Parish Council	Yes	
Farthingstone Parish Council	Yes	This is subject to Natural England's agreement
Althorpe Estates (Lucas Land Planning)	Yes	The Estate are custodians of the countryside, like other landowners- we strongly believe no imposition of any further policies on Biodiversity are needed.
Tony Dodd (resident - Welton)	No	The importance of BAP and support from other bodies shows this should be an issue with its own topic.
Welford Parish Council	Yes	
Welton Parish Council	No	Make use of 7.15 and 7.16 for additional policy which should deal with biodiversity in its own right. Emphasise the importance and relevance of BAP. Refer to support for diversity from RSPB, Wildlife Trust etc.
Badby Parish Council	No	
Environment Agency	No	Until the Sustainability Appraisal has been completed we cannot agree to no further policy on this matter
David George (resident - Kilsby)	Yes	

Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Overstone Parish Council	Yes	
Moulton Parish Council	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	Yes	
Maidwell with Draughton Parish Council	Yes	

#### Issue 38 Water Supply, Quality and Wastewater Infrastructure- Policy BN7A

Q38a. Further to Policy BN7A of the WNJCS it is not considered necessary for this Local Plan to include an additional policy on water supply, quality and wastewater infrastructure, except as in Q39b below. Do you agree?			
Q38b. If no please specify what should be included.			
Q38c. Further to policy Ho11 of the emerging Housing SPD, should the Part 2 Local Plan include a policy requiring the optional additional water efficiency standard of 110 litres per day?			
Name	Response		
	38a	38b	38c
Anglian Water		<p>Partially agree - We note that the West Northamptonshire Core Strategy already includes a district wide policy relating to water supply, quality and wastewater infrastructure.</p> <p>It is not considered necessary to duplicate the requirements of Policy BN7A in the Part 2 Local Plan. However it would be helpful to consider whether there any specific development criteria for the proposed allocation sites (once identified) which are needed relating to water and water recycling infrastructure.</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.</p> <p>Daventry District is located in a water stressed area as defined in the Environment Agency's maps. Therefore we would support the principle of the optional water efficiency standard being applied within District Council. However the District Council will need to consider further the impact that such a requirement would have on the overall financial viability of the Local Plan.</p>
Anthony Davies (resident - Welton)	Yes		Yes
Boughton Parish Council	Yes		Yes
Braunston Parish Council	Yes		Yes
Brixworth Neighbourhood Plan Steering Group	No	Evidence should be provided by the relevant treatment authority that are meeting and will continue to meet appropriate standards before the impact of development is considered	

Church with Chapel Brampton Parish Council	Yes		Yes
CPRE	Yes		Yes
Crick Parish Council			The 110 litre standard should be incorporated to be part of ensuring that new development is as environmentally friendly as possible.
Gladman – various sites		<p>Gladman consider that it is not necessary to replicate or elaborate on policies that are in line with those contained in national policy and guidance. Gladman remind the Council of the guidance contained within PPG (Reference ID: 12-010-20140306), which states that: In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.</p> <p>Gladman would remind the Council to pay careful attention to the requirements set out in paragraph 173 and 174 of the Framework regarding viability and not placing undue policy burdens on developers that prevent the plan from being delivered.</p>	<p>Gladman consider that it is not necessary to replicate or elaborate on policies that are in line with those contained in national policy and guidance. Gladman remind the Council of the guidance contained within PPG (Reference ID: 12-010-20140306), which states that: In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.</p> <p>Gladman would remind the Council to pay careful attention to the requirements set out in paragraph 173 and 174 of the Framework regarding viability and not placing undue policy burdens on developers that prevent the plan from being delivered.</p>
Daventry Town Council	Yes		Yes
Great Oxendon Parish Council	Yes		Yes
Guilsborough Parish Council	Yes		Yes
Home Builders Federation			Water efficiency standards as set out in NPPG (ID 56-015) if the higher optional standard of 110 litres per person per day is proposed then the need for and viability of opting for this standard should be properly justified in evidence ;
Environment Agency	No	Until the Sustainability Appraisal has been completed we cannot agree to no further policy on this matter	Yes
David George (resident - Kilsby)	Yes		No
Hollowell and Teeton Parish Council	Yes		Yes
Nikolas Moore (resident - Boughton)	Yes		Yes
Overstone Parish Council	Yes		No
Moulton Parish Council	yes		No
Francis Jackson Homes	Yes		No

Weedon Bec Parish Council			Yes
Maidwell with Draughton Parish Council	Yes		Yes

### Issue 39- Flood Risk- Policy BN7

Q39a. Further to Policy BN7 of the WNJCS it is not considered necessary for this Local Plan to include an additional policy on flood risk. Do you agree?  
Q39b. If no please specify what should be included.

Name	Response	
	39a	39b
Anglian Water	Yes	We note that the West Northamptonshire Core Strategy already includes a district wide policy relating to flood risk. It is not considered necessary to duplicate the requirements of Policy BN7 in the Part 2 Local Plan.
Anthony Davies (resident - Welton)	No	By extending development two dimensionally more rainfall will be discharged down river without consequent dangers further down. It is important that the third dimension - up - is encouraged. 3, 4 or even 5 story dwellings near town centres.
Boughton Parish Council	Yes	Building on Flood Plain
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Gladman – various sites	Yes	Gladman consider that it is not necessary to replicate or elaborate on policies that are in line with those contained in national policy and guidance. Gladman remind the Council of the guidance contained within PPG (Reference ID: 12-010-20140306), which states that: In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.  Gladman would remind the Council to pay careful attention to the requirements set out in paragraph 173 and 174 of the Framework regarding viability and not placing undue policy burdens on developers that prevent the plan from being delivered.
Daventry Town Council	Yes	
Great Oxendon Parish Council	No	Any new development should not be built on flood plains
Guilsborough Parish Council	Yes	
Kilsby NDP Steering Group for Kilsby Parish Council	Yes	

Mark Wesley (resident - Daventry) (resident - Daventry)	Yes	
Naseby Parish Council	Yes	
Persimmon Homes	Yes	
Long Buckby Parish Council	Yes	
Staverton Parish Council	Yes	
Farthingstone Parish Council	Yes	
Althorpe Estates (Lucas Land Planning)	Yes	Support the Core Strategy- no need for additional policies.
Tony Dodd (resident - Welton)	No	Present policies fail to recognise the increasing frequency and severity of weather events. What was previously deemed acceptable (1 in 100 year event) is now frequently encountered so we need to be forward planning rather than using outdated predictions.
Welford Parish Council	Yes	
Welton Parish Council	No	In light of recent serious flooding in parts of the UK and likely link to climate change a new policy on flooding should be given urgent consideration and should be based on the latest scientific predictions of severe flood risks.
Northamptonshire County Council (Planning Services)		It is agreed that there is no necessity for the Part 2a Plan to expand upon Policies BN7 and BN7A. However if it is decided to do so then any Part 2a policy should take the opportunity to reference the Local Standards for Sustainable Drainage in Northamptonshire and also the Northamptonshire Local Flood Risk Management Strategy: <a href="https://www.floodtoolkit.com/wp-content/uploads/2015/10/Northamptonshire-LFRMS-Report.pdf">https://www.floodtoolkit.com/wp-content/uploads/2015/10/Northamptonshire-LFRMS-Report.pdf</a>
Maidwell with Draughton Parish Council	No	It is necessary for greater attention to be paid to the diversion of surface and ground water in planning applications so that such diversion does not cause flooding to properties not previously at risk.
Environment Agency	Yes	We also support objective 1 in relation to climate change. Please note that updated guidance on how climate change could affect flood risk to new development - ' <a href="#">Flood risk assessments: climate change allowances</a> ' was published on gov.uk on 19 February 2016. The Welland and Nene river catchments fall within the Anglian River Basin District.

#### Issue 40- Renewable Energy and Low Carbon Economy

Q40a. It is intended that the Local Plan will include a further criteria based policy on renewable energy. What should it include?			
Q40b. Further to policy Ho10 of the emerging Housing SPD, should the Part 2 Local Plan include a policy requiring energy efficiency measures equivalent to level 4 of the former Code for Sustainable Homes? Please explain your answer below			
Name	Response		
	40a	40b	Explanation
Boughton Parish Council	Consideration should be given to the cumulative impact that solar farms and wind turbines have on the	Yes	

	rural landscape.		
Braunston Parish Council	We would like to see the Local Plan favour development proposals that include sustainable non-combustion based heating systems such as air and ground source heat over those that do not. We would like to see domestic PV solar installations similarly favoured. In addition we would like the Local Plan to support and encourage community led renewable energy projects.	Yes	Energy efficiency measures should be included in houses when built as this is much more cost effective than later conversion work.
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)		No	The Government has scrapped the Code for Sustainable Homes, and energy efficiency measures have been incorporated into Building Regulations.
CPRE	Arrive at a policy after consultation with those who have relevant expertise. Only developments that are sensitive to the landscape should be permissible.	Yes	
Crick Parish Council	DDC 's obligation to do its bit for climate change. DDC should seek to meet its contribution to addressing climate change by ensuring all new building uses all available means to reduce the use of renewable energy (solar panels, photo voltaic panels, increased insulation, even combined heat and power where appropriate, and improving efficiency		New development should conform with the equivalent of Level 4 of the former Code. Level 4 was an intended goal but has been abandoned at present for no perceived reason other than cost. However, energy and the cost of it will continue to be a growing issue and ensuring houses are built to exacting standards in relation to energy use is in the long-term interests of both residents of the houses and the country. As Daventry is home to the iCon Centre it should be at the forefront of ensuring energy saving innovation is incorporated into all new development.

	rather than large scale wind turbines and solar farms.		
Gladman – various sites	Gladman would highlight that the Deregulation Bill 2015 specifies that Councils cannot set any additional local technical standards relating to the construction, internal layout or performance of new dwellings other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings where these are supported by evidence of need and viability. Furthermore, Gladman would remind the Council to pay careful attention to the requirements set out in paragraph 173 and 174 of the Framework regarding viability and not placing undue policy burdens on developers that prevent the plan from being delivered.		Gladman would highlight that the Deregulation Bill 2015 specifies that Councils cannot set any additional local technical standards relating to the construction, internal layout or performance of new dwellings other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings where these are supported by evidence of need and viability. Furthermore, Gladman would remind the Council to pay careful attention to the requirements set out in paragraph 173 and 174 of the Framework regarding viability and not placing undue policy burdens on developers that prevent the plan from being delivered.
Daventry Town Council	Unable to comment	Yes	To ensure energy efficiency measure are constantly reviewed, revise and applied wherever/whenever possible.
Geoff Pullin (Resident-Badby)			Beware developers claiming unviability
Great Oxendon Parish Council	The need to assess the impact (visual etc.) on the local environment. It should not be provided at the cost of the open countryside	Yes	Address climate change

Guilsborough Parish Council	<p>The district has more than its share of large scale developments especially wind farms, but also solar farms and should not accept any more. The weakness in planning policy, including landscape policy has been a major contributory factor. It is completely unacceptable that a landowner led approach has been allowed.</p> <p>If there is a national requirement for any large scale renewables (bio, solar, wind etc) then the Plan should identify specific locations in areas that large scale employment land would also be suitable, and not in the open countryside.</p> <p>SLA's should be brought back and strengthened, with additional weight to effects of development on views out from the SLA. Large scale renewables should not be acceptable in SLA's or other sensitive and/or valued landscapes.</p>	No	
Historic England	<p>Harm to the significance of heritage assets and their setting is highly likely to occur from renewable developments, such as a result of the height and scale of commercial windfarms</p>		

	<p>or the scale of solar farms, together with cumulative impact. Subsequently, heritage assets and cumulative impact should be reflected within a policy in the Part 2 plan with additional criteria such as;</p> <p><i>-Have not significant impact on heritage assets or their setting</i></p> <p><i>- All reasonable steps have been taken to avoid or mitigate any adverse impacts including, but not limited to, landscape, noise, visual and cumulative impacts.</i></p>		
Home Builders Federation		No	Energy efficiency standards the Council should not be setting any standards to exceed the requirements as set out in the Building regulations. The only permissible reference is for a proportion of energy used to be from renewable or low carbon sources ;
Mr DJS & Mrs SE Wilson (residents – Badby)	<p>Wind turbines have become the dominant, defining and industrialising landmarks for large tracts of the countryside to the north of Daventry to the considerable detriment of their surroundings and the quality of life of all who come within sight or earshot.</p> <p>Further criteria based policy should at least address the issues covered by the existing "Interim Guidelines when assessing proposals for the development of wind turbines." (Revised Version Adopted 2012).</p>		

	<p>Reference to the need to secure local support for new proposals should be added together with a recognition that there is now enough wind energy generating capacity operating, consented or in the planning system to meet national targets.</p> <p>Wherever possible, controls should be strengthened to minimise the harmful impact of wind turbines and consideration given to introducing a policy presumption against more such development in the District and above all in the SLAs.</p>		
<p>Tony Dodd (resident - Welton)</p>	<p>In addition to all the existing national and local policies, raise the standard of construction well above the present, rather basic, levels and thereby reduce both the carbon content of the build and the long-term energy consumption. The iCon building was supposed to be a key driver in this technology yet the LPA does not use its leverage to be "greener".</p> <p>Residential amenities need to be protected from disturbance by siting large wind farms</p>	<p>Yes</p>	<p>Should be higher - PassivHaus standards?</p>

	<p>nearby (this district has one of the highest densities of wind turbines per populated area of England).</p> <p>Community buildings must plan to use increased levels of renewable energy (solar, geothermal) to spur their adoption by the local communities.</p>		
Welford Parish Council	<p>An absolute ban on further wind turbine development.</p> <p>Upgrade existing buildings to be more energy efficient.</p>	Yes	
Welton Parish Council	<p>Respect for character of the local environment/landscape</p> <p>Protection of residential amenity</p> <p>Make reference to plan Objective 1</p> <p>Stress that district has its fair share of wind turbines, see 7.21</p> <p>Make reference to recent central government shift on renewables</p> <p>Ensure all aspects of S11 are covered</p>	Yes	<p>Matches Objective 1 on climate change</p> <p>Energy cost savings for consumers</p> <p>Investigate Passiv haus standards in Germany</p>
Badby Parish Council	<p>The current listing is subjective.</p>	Yes	
Scaldwell Parish Council	<p>Greater awareness of the impact of Wind turbines on the local environment, whether natural or of historical interest.</p>		
David George (resident - Kilsby)	<p>Efficiency of wind turbines and other green energy devices</p>	Yes	

Hollowell and Teeton Parish Council	Adoption of evidence based standards / criteria	Yes	
Nikolas Moore (resident - Boughton)	National guidelines only	Yes	
Overstone Parish Council		Yes	
Moulton Parish Council		Yes	
Francis Jackson Homes		No	
Weedon Bec Parish Council	Measures to encourage the building of eco housing and innovative design in rural areas to complement more traditional construction - small eco parks and self build should be promoted and the latter is v popular. Such developments could act as a demonstration project (e.g. future world in MK) and promote change and modernisation	Yes	
Maidwell with Draughton Parish Council	To ensure that green energy proposals are evenly distributed throughout the region and only permitted if economically viable.	Yes	Code 4 is a realistic and attainable level of sustainability for new homes.

#### Issue 41- Transport- Policy C1

Q41a. Further to Policy C1 of the WNJCS it is not considered necessary for this Local Plan to include an additional policy on transport. Do you agree?

Q41b. If no please specify what else should be included.

Name	Response	
	41a	41b
Anthony Davies (resident - Welton)	No	In the light of recent publicity of NO2 dangers, perhaps there should be more focus on transport in relation to health

Boughton Parish Council	Yes	
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	Yes	
Chris Myers (Resident- Long Buckby)		I strongly support policy C1
CPRE	No	The objectives of the policy are justified but there has to be a recognition of reality. Many villages have very poor or non-existent public transport and residents therefore have to rely on private cars as other options are not practical. There should therefore be recognition of the need for adequate, and, if possible, free parking for rural residents to centres such as Daventry, Brackley and Weedon (notwithstanding Q42 below)
Gladman – various sites	Yes	Gladman consider that it is not necessary to replicate or elaborate on policies that are in line with those contained in national policy and guidance. Gladman remind the Council of the guidance contained within PPG (Reference ID: 12-010-20140306), which states that: In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.  Gladman would remind the Council to pay careful attention to the requirements set out in paragraph 173 and 174 of the Framework regarding viability and not placing undue policy burdens on developers that prevent the plan from being delivered.
Daventry Town Council	Yes	
East Northamptonshire District Council		The two Local Authority areas share some strategic connections such as road networks; specifically the A45 and A14. Figure 5 shows the indicative spatial housing options for Daventry. It is noted that any growth will have a large impact on the A45, so the appropriate bodies should be consulted and mitigation measures should be implemented.
Geoff Pullin (Resident- Badby)		Planning may be in favour of the policy but what about the money to do them! Again we need a better way of moving from the value of agricultural land to developed land with the profit, being fair to the landowner, but biased towards getting utilities and facilities provided.
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	Yes	
Welton Parish Council	Yes	
Northamptonshire County Council (Planning Services)		The County Council no longer supports the modal shift targets as presented in the Northamptonshire Local Transport Plan. The Part 2a Plan should make no reference to them, including reference to 40% modal shift, and instead make a more general commitment supporting well connected sustainable transport options for all new developments. In the light of this, any taking forward of Policy C1 as a policy in the Part 2a Plan should be titled as ‘Changing Behaviour and Enabling Sustainable Transport’.  Northampton Northern Orbital is a proposed new road that will link the A5199 between Kingsthorpe and Chapel Brampton with the A43 north of Moulton. The new road will also connect with the Moulton Park industrial estate. The County Council has recently consulted on four possible routes for the proposed new road and will presenting the results of that consultation to Cabinet in the summer. If this results in a preferred route for this scheme and the route would then need to be safeguarded through policy and shown on the Policies Map for the Local Plan.
Badby Parish Council	No	The Parish Council sees no requirement.
Scaldwell Parish Council	Yes	
David George (resident - Kilsby)	No	More must be done to protect rural roads and stop them being used as rat runs

Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Overstone Parish Council	Yes	
Moulton Parish Council	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	No	For a village with poor connectivity by public transport the targets are unrealistic. More effort should be put into improving public transport and promoting connectivity. You assert that most of Daventry is walkable within 15 minutes - a bit optimistic for all except the very fit; pushing a buggy you might think differently nevertheless it is something of an achievement. However a similar visit to the shops/services for someone in a village especially with children can take most of a day travelling by public transport; it is this that needs improvement
Maidwell with Draughton Parish Council	Yes	

#### Issue 42- Car Parking Standards

Q42a. Subject to the Council being satisfied that the revised car parking standards are appropriate it does not intend to develop any further policies in this regard. Do you agree this is the correct approach? Q42b. If not please explain what alternative approach should be taken.		
Name	Response	
	42a	42b
Boughton Parish Council	Yes	
Braunston Parish Council		We would like the plan to promote high standards of permeable surfaces for all car parking in the District. We would like the plan to consider the long term effect on the District of new developments built with insufficient parking.
Brixworth Neighbourhood Plan Steering Group	No	Should define a minimum of 2 off road car parking positions per dwelling
Chris Myers (Resident- Long Buckby)		I think policy should attempt to address the inadequacy of on street parking in older streets where there is little or no space for garages or hard standing. The parking problem spills out on to main thoroughfares which are already congested and partly obstructed.
Church with Chapel Brampton Parish Council	Yes	
CPRE	No	We only agree with safeguards. As mentioned in question 41b.
Daventry Town Council	No	The Council should remain flexible in its approach to car parking standards and generate policies that apply to the specific area and its surrounding environment and identified needs.

Geoff Pullin (Resident- Badby)		The standards need to make much greater provision for off road parking especially in rural areas where cars per household are inevitably higher and more likely to grow. New urban estates also need greater and easy to use spaces. Cars are getting wider so the dimensions of spaces needs looking at, or the manufacturers need to have constraints legislated.
Great Oxendon Parish Council	No	Permissions are granted to developments with satisfactory parking, however existing parking problems continue or are disrupted by the new development. Off site car parking needs addressing. Prevent building on garage sites
Guilsborough Parish Council	No	
Northamptonshire County Council (Planning Services)		The County Council is supportive of the suggestion to use the updated Northamptonshire Parking Standards as the basis for parking guidance within the plan area.
Badby Parish Council	No	There are compelling reasons for parking standards being laid down. Parking needs have to be based on realistic assessments.
Scaldwell Parish Council	Yes	
Hollowell and Teeton Parish Council	Yes	
David George (resident - Kilsby)	No	Developers and builders must be encouraged to build basement car parks on all new build sites. This is common practice in other countries.
Nikolas Moore (resident - Boughton)	Yes	
Overstone Parish Council	Yes	
Moulton Parish Council	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	No	Tandem parking on new housing developments should be discouraged and if included counted as 1 space as people do not car shuffle and it encourages parking on the road. Garages where included should be big enough to take todays larger cars otherwise people convert them to liveable rooms and park on the road
Maidwell with Draughton Parish Council	Yes	

#### Issue 43- Roadside Service Areas

Q43a. Does the plan need a policy for roadside service areas?		
Q43b. If yes please specify what this should include.		
Name	Response	
	43a	43b
Boughton Parish Council	No	

Braunston Parish Council	Yes	Adequate provision for commercial vehicles to stop within accessible distances of local facilities on the A roads.
Brixworth Neighbourhood Plan Steering Group	Yes	Should include encouragements for service area or rest areas near the M1/M6/A14
Church with Chapel Brampton Parish Council	No	
CPRE	Yes	Roadside service areas are widely used, including by truck drivers for overnight stops. Therefore there should be an explicit requirement for adequate and well maintained facilities, for example, for there to be litter bins that are emptied frequently
Daventry Town Council	Yes	
Geoff Pullin (Resident- Badby)		Need to encourage economically viable off-road resting areas to tidy up the roads lay-bays that are now constantly in use. Drivers need proper facilities to be able to meet working time restrictions and arrival at destination on time requirements.
Kilsby NDP Steering Group for Kilsby Parish Council	Yes	There needs to be a policy about control of littering in roadside service areas and the enforcement of the litter laws.
Naseby Parish Council	No	
Long Buckby Parish Council	No	
Northamptonshire Police	Yes	Secure facilities for HGV lorries and their drivers to an independently accredited security standard.
Staverton Parish Council	No	
Farthingstone Parish Council	Yes	It is inevitable that parking areas will be used by truck drivers, especially for overnight stops. The Local Plan should therefore require provision of adequate facilities which would include the provision of adequate litter bins that are frequently emptied so that the litter problem can be reduced.
Tony Dodd (resident - Welton)	No	
Welton Parish Council	Yes	Facilities to be made available: parking capacity, minimum distance from settlements, distance between service areas.
Northamptonshire County Council (Planning Services)		It is considered that the Part 2a Plan should have a policy relating to Roadside Services Areas and that it should consider where these facilities might be located and what as a minimum the individual facilities might provide for drivers.
Badby Parish Council	No	
David George (resident - Kilsby)	Yes	Enforcement of the litter laws.
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Francis Jackson Homes	No	

Weedon Bec Parish Council	Yes	Should be discouraged every where except motorways and no overnight lorry parking. Short term parking bays to include signage to nearest shops/services particularly in rural areas.
Maidwell with Draughton Parish Council	No	

#### Issue 44- Daventry International Rail Freight Terminal- Policy E4

Q44a. Further to Policy E4 of the WNJCS and the existing consents it is not considered necessary for this Local Plan to include an additional policy on DIRFT. Do you agree? Q44b. If no please specify what the plan should include.		
Name	Response	
	44a	44b
Boughton Parish Council	Yes	
Braunston Parish Council	Yes	We believe there is value in developing an additional policy on DIRFT which incorporates HGV routing. We would also like this policy to recommend integrating DIRFT into the wider transport network through the provision of a passenger rail station, accessible by sustainable transport modes.
Brixworth Neighbourhood Plan Steering Group	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Daventry Town Council		
Tony Dodd (resident - Welton)	No	Design, landscaping and liaison between DDC and Rugby / EWDC.
Welton Parish Council	No	Further details on standards or layout Landscaping measures Building design and materials Liaison between Rugby and DDC regarding phase 3
Northamptonshire County Council (Planning Services)		The Part 2a Plan should expand upon Policy E4 of the Part 1 Core Strategy to include specific details with regards to lorry parking and the management of such facilities.
Badby Parish Council	No	
David George (resident - Kilsby)	No	Establish and control permitted routes to and from DIRFT that must be adhered too.
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	No	DIRFT Has been allowed to let rip for too long. It's time to bring it under control. It is on the Northampton Loop and so immediately at a disadvantage, and the real reason it is being promoted is because it is close to M1 J18. Its designation has not in reality helped remove freight from the motorway network in any meaningful way - it could be argued that its location adjacent to the motorway has encouraged additional use of the motorway network
Francis Jackson Homes	Yes	

Weedon Bec Parish Council	Yes	
Maidwell with Draughton Parish Council	Yes	

Q44c. DIRFT is mapped in Appendix C. Is it defined correctly?  
Q44d. If no please specify how it should be changed.

Name	Response	
	44c	44d
Boughton Parish Council	Yes	
Church with Chapel Brampton Parish Council	Yes	
Daventry Town Council		Unable to comment
Geoff Pullin (Resident- Badby)		How do you deal with Rugby and their planning on the west of the A5?
Kilsby NDP Steering Group for Kilsby Parish Council		Looks ok to us.
Long Buckby Parish Council	Yes	
Staverton Parish Council	Yes	
Badby Parish Council	Yes	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	No	Limited to existing consented area only
Weedon Bec Parish Council	No	We don't know - there is no option to report this and it would be dishonest to answer yes!

#### Issue 45- Education- Policy E6

Q45a. Is there anything else that the plan should include regarding education further to that that set out in Policy E6? Q45b. If yes please specify		
Name	Response	
	45a	44b
Boughton Parish Council	No	
Braunston Parish Council	Yes	We would like the plan to reference further and adult education, and to take in informal learning opportunities as well as formal ones.
Brixworth Neighbourhood Plan Steering Group	No	
CPRE	No	
Gladman – various sites	No	Gladman consider that it is not necessary to replicate or elaborate on policies that are in line with those contained in national policy and guidance. Gladman remind the Council of the guidance contained within PPG (Reference ID: 12-010-20140306), which states that: In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.
Daventry Town Council	Yes	Need to expand on how educational institutions will be supported. Refer to existing educational establishments and set out to review current provision and standards to ensure high quality education is achieved for all.
Geoff Pullin (Resident-Badby)		Logistics is indeed seriously short and becoming shorter by age distribution of truck drivers. Good access is needed for people to train at DIRFT 3 or they will all come from Rugby.
Great Oxendon Parish Council	No	
Badby Parish Council	No	
Scaldwell Parish Council	No	
David George (resident - Kilsby)	No	
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Francis Jackson Homes	No	
Weedon Bec Parish Council	Yes	Accessibility and cost of transport for young people especially to Silverstone training options; lack of public transport
Maidwell with Draughton Parish Council	No	

#### Issue 46- Community Services Facilities- Policy RC2

Q46. Further to policy RC2 of the WNJCS what else should the plan include regarding community services and facilities?	
Name	Response
Anthony Davies (resident - Welton)	Has enough attention been paid to provision of sports grounds. The expansion of NE Daventry does not appear to include large areas such as for football, tennis or cricket.
Chris Myers (Resident- Long Buckby)	I suggest that the policy RC2 specifically recommends community centres, libraries and – in the absence of these -multi-purpose buildings which could serve as a drop-in centre and a venue for community groups.

CPRE	It is not possible to comment in any detail until the outcome of other research/consultation is complete
Gladman – various sites	The policy should state that viability will be taken into account when requesting the provision of community facilities as part of new development and for flexibility over the level and nature of contribution required where viability concerns arise. We would remind the Council to pay careful attention to the requirements set out in paragraph 173 and 174 of the Framework regarding viability and not placing undue policy burdens on developers that prevent the plan from being delivered.
Daventry Town Council	Note a consultation and survey is currently being carried out in relation to community services facilities- would suggest results of this survey be fed into the plan.
Geoff Pullin (Resident- Badby)	Cycle ways in new estates direct towards town/schools
Guilsborough Parish Council	Add 'facilities will need to be supported and funded by a long term...etc Add in policy strengthening the role of neighbourhood plans led priorities for funding community facilities.
Northamptonshire County Council (Heather Webb)	Recognising that Daventry District Council is currently working on a new Open Space, Sport and Recreation Strategy I would add that new development should contribute to achieving Natural England's Accessible Natural Greenspace Standard (ANGSt). The standard recommends that everyone should have an accessible natural area: <ul style="list-style-type: none"> <li>☑ Of at least 2ha in size, no more than 300m from home</li> <li>☑ At least one accessible 20ha site within 2km of home</li> <li>☑ One accessible 100ha site within 5km of home, and</li> <li>☑ One accessible 500ha site within 10km of home.</li> </ul> The Daventry Infrastructure Studies Green Infrastructure and Landscape Report recognised ANGSt as a 'key infrastructure requirement' for the town's projected population, in particular to ensure a 2ha accessible natural greenspace within 300m of all homes.5 The proposed expansion of Daventry Country Park and Borough Hill will greatly contribute to accessible natural greenspace within and around the town, however a number of rural communities (e.g. Weedon, Flore) remain without provision (Figures 4-7). The LPP2a should seek to address these deficiencies where possible. This would also contribute to issue 47 regarding Health and Wellbeing, as it is recognised in paragraph 8.14 that 'the built and natural environments are major factors that influence health and well-being (sic)'.
Messrs Jackson (Landmark Planning)	The Plan should not overlook the opportunity that new developments provide for the provision of new community facilities. In West Haddon, there is a proposal in the Neighbourhood Plan that the primary school be allowed to expand on to the site of the existing village hall. Opportunities for a replacement village hall facility are limited close to the centre of the village, however, the land at Guilsborough Road offers an opportunity to provide a replacement village hall site which would still be accessible on foot or by bicycle for the vast majority of the people in the village.
Persimmon Homes	Evidence of where there is a need for particular facilities.
Long Buckby Parish Council	Policy should specifically link developer provision for community facilities to those detailed in the settlement hierarchy.
Staverton Parish Council	Utilise the local hospital more.
Farthingstone Parish Council	No comment. It is not possible to comment in any detail (if at all) until the outcome of other research/consultation is complete.
Althorpe Estates (Lucas Land Planning)	The Estate is aware that the 2009 Recreation Plan is effectively out of date and an update is essential to the Local Plan. As large landowners in the area between Daventry and Northampton the Estate would like to be involved in any consultation and policy formulation updates and look forward to being kept involved in progress on the plan.
Tony Dodd (resident - Welton)	Add input from Neighbourhood Plans.
Moulton College (Turley)	PolicyRC2 provides support for new facilities alongside other new development and also seeks to resist the loss of existing facilities. It does not however currently offer any support for new sport, leisure or recreational facilities in their own right. New facilities may in their own right play a valuable role in addressing an identified need, or enhancing the opportunities currently available - either at a local level or at a much broader (regional or even national) scale.

	The Local Plan should provide a broader level of support than that currently specified in RC2 to allow for new or expanded facilities in their right, where a need has been demonstrated or where wider planning benefits can be realised.
Welton Parish Council	References to 'made' neighbourhood plans in final paragraph of policy RC2.
David George (resident - Kilsby)	Nothing
Hollowell and Teeton Parish Council	No additions required.
Weedon Bec Parish Council	No sizeable development should be permitted in rural/primary service settlements until provision is agreed, timetabled and funded for community services especially schools GP's so that the same level is achieved as in towns. This applies also to sports and recreation facilities as it cannot be assumed that just because a village is surrounded by open countryside that that countryside is accessible or suitable for recreation and exercise.

#### Issue 47 - Health and Wellbeing

Q47. Is there anything the plan should include on health and well-being beyond what is already set out in the WNJCS, in particular Policy RC2?	
Name	Response
Daventry Town Council	Note policy RC2 is not specific in relation to type/amount/size of facilities being provided and should perhaps include figures relating to services required for X no of residents.
Great Oxendon Parish Council	No
Mark Wesley (resident - Daventry) (resident - Daventry)	Number of people is driver for delivery of service along with clear view of access/communications.
Long Buckby Parish Council	No
Staverton Parish Council	Protect current services.
Tony Dodd (resident - Welton)	Amalgamate the various strands into a concise and cohesive policy.
Moulton College (Turley)	Our comments on Issue 46 are also relevant to this question.
Welton Parish Council	See 46a response. Draw together what different policies have to say about health and wellbeing into one easily accessed policy.
Badby Parish Council	No
David George (resident - Kilsby)	No
Hollowell and Teeton Parish Council	No

Overstone Parish Council	Align with/make reference to Northamptonshire Joint Health and Wellbeing Strategy
Moulton Parish Council	Align with/reference the Northamptonshire Health and Wellbeing Strategy
Weedon Bec Parish Council	More attention should be paid to exercise options for older people eg equipment in parks; seats on walking routes so that less able people feel confident to get out more and included

#### Issue 48- Daventry Country Park

Q48a. It is proposed that the plan does not need a specific policy for Daventry Country Park. Do you agree? Q48b. If no, what should it include?		
Name	Response	
	48a	48b
Anthony Davies (resident - Welton)	No	See response to Q37b. Need for specific plans to ensure diversity of wildlife. We do not want the Country Park to become a town pond.
Boughton Parish Council	Yes	
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Daventry Town Council	No	Preservation and enhancement. Maintenance and long term sustainability determine boundary.
Geoff Pullin (Resident-Badby)		Sorry, I haven't been once since car parking charges were introduced! It needs to be maintained and increased as already allowed for at NW and NE
Kilsby NDP Steering Group for Kilsby Parish Council	No	We believe that there should be a specific policy in respect of the proposed expansion and the protection of Daventry Country Park which is such an important asset to the town.
Mark Wesley (resident - Daventry) (resident - Daventry)	Yes	Let's define a boundary to protect the park.
Persimmon Homes	Yes	
Long Buckby Parish Council	Yes	

Staverton Parish Council	No	Stop parking charges at country park.
Farthingstone Parish Council	Yes	
Mr DJS & Mrs SE Wilson (residents – Badby)	Yes	
Tony Dodd (resident - Welton)	Yes	The Town and District Councils promote this facility as "the jewel in Daventry's crown". It therefore deserves specific recognition in terms of its leisure, health and biodiversity contributions, and deserves protection so it continues to provide these benefits.
Welton Parish Council	No	The detail in 8.15 need to be incorporated into a policy. The welcomed extensions mentioned in 8.16 need to be incorporated into the same policy. The Country Park is a key resource in terms of biodiversity, health and wellbeing, leisure and tourism in the district (and beyond it), it therefore deserves and needs a specific policy.
Badby Parish Council	Yes	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	No	Protection for the entirety of the park and significant mitigation /enhancement measures in the event that the SUE is built
Weedon Bec Parish Council	Yes	
Maidwell with Draughton Parish Council	Yes	

#### Issue 49- Daventry Canal Arm

Q49. Further to Policies D1 and D3 of the WNJCS does the Local Plan need to include anything else regarding the Daventry Canal Arm?	
Name	Response
Brixworth Neighbourhood Plan Steering Group	No
Canal and River Trust	<p>Policies D1 and D3 of the WNJCS do not contain any detail regarding the Daventry Canal Arm, although Policy D3 requires the provision of structural greenspace and wildlife corridors, including a corridor for the Daventry Canal Arm, as part of the proposed development of the Daventry North east Sustainable Urban Extension.</p> <p>We consider that it is a matter for the Council to decide whether it is necessary or appropriate to include more detail within the Local Plan, but we would ask that we are consulted on any further details or policies as may be proposed to be included, as the canal arm is proposed to connect to the wider canal network owned and operated by the Trust.</p>

CPRE	No
Daventry Town Council	Policy D1 (D3(i)) of WNJCS is non-specific in relation to the Daventry Canal Arm – it refers to the inclusion of the canal corridor, which would suggest reference to the existing canal and not the proposed Daventry Canal Arm. Therefore we do not consider the WNJCS sufficiently covers this proposal within its development plan. The Local Plan has insufficient information on the proposed Grand Union Canal extension and should not be included in the local plan until more detailed information is available.
Geoff Pullin (Resident-Badby)	For goodness sake don't go for a fancy unlikely-to-work lift arrangement. Old fashioned lock gates keep bystanders / helpers and boaters happy.
Historic England	If a policy is included, it would provide a valuable opportunity to include a criterion to ' <i>protect and enhance the Grand Union Canal Conservation Area</i> .
Mark Wesley (resident - Daventry) (resident - Daventry)	Define the development, visitor facility area, road access.
Barratt Developments, Davidsons Developments, House Trustees Ltd & Lower Thrupp Ltd (Pegasus Group)	Our third observation is in relation to Issue 49 and the Daventry Canal where the consultation document asks whether the Local Plan should include anything further on this. Our position is that the inclusion of a specific safeguarded route (as per the present planning application route for the canal) as part of the Local Plan would assist in providing greater clarity for the delivery of the SUE and the canal.
Long Buckby Parish Council	No
Staverton Parish Council	No canal arm required.
Farthingstone Parish Council	No
Althorpe Estates (Lucas Land Planning)	What is the progress and timing of this matter as clearly there are implications for Daventry Town development.
Mr DJS & Mrs SE Wilson (residents – Badby)	In the absence of a comprehensive risk assessment and cost/benefit analysis, we have grave misgivings that this project can represent value for money to those who will fund or those who will use it. The boat lift will not enhance the scene and Daventry as a destination has little to justify the time or the effort of the trip for boaters. Issues that require consideration include: <ul style="list-style-type: none"> <li>- construction costs</li> <li>- clarification of responsibility for and costs of maintenance.</li> <li>- source of funding</li> <li>- detail of how, in time of drought, the canal and marina can be kept supplied with water in this upland watershed location</li> <li>- detail of provision for the safety and security of boats moored in Daventry, particularly overnight</li> <li>- provision of facilities for boaters, eg drinking water and fuel supply and waste water disposal services</li> </ul>
Tony Dodd (resident - Welton)	This is a very expensive vanity project which should be scrapped now. DDC is making severe cuts to its expenditure yet it persists with this "canal to no where".
David George (resident - Kilsby)	No
Hollowell and Teeton Parish Council	No

Weedon Bec Parish Council	No
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### Issue 50 – Canal Marinas

Q50a. Is there a need for a policy specifically related to canal marinas across the District? Q50b. If yes, what should it include?		
Name	Response	
	50a	50b
Boughton Parish Council	No	
Braunston Parish Council	Yes	We believe a separate marina policy that takes in CRT policy on marina development as well as other WNJCS policies including BN2 (biodiversity) and BN5 (historical environment and landscape), would be of value.
Brixworth Neighbourhood Plan Steering Group	No	
Canal and River Trust		Marina schemes that wish to connect to the Canal & River Trust's canal network require the formal consent of the Trust. The Trust would comment that it is a matter for the Council to decide whether there should be a policy relating specifically to canal marinas, but should a policy be considered necessary, we would suggest that the Council contact us to discuss matters in more detail.
CPRE	Yes	Possibly. Ideally, normal planning policies should apply. Developments such as those providing leisure facilities can be important for the local economy but they need to be established in a way that enhances the local environment and facilities. They need to be in an appropriate location for road as well as canal links with provision of appropriate utilities and infrastructure.
Crick Parish Council	Yes	Canal Marinas – a policy should be adopted to cover these as the number and size in the area is now very significant. Many are used as second homes for the weekend rather than for boating and they bring demands for nearby villages in terms of traffic, use of services and visual disturbance as well as adversely affecting the towpath scene and must impact on the use of the canals and its borders as identified in the Northamptonshire ECA. as wildlife corridors.
Daventry Town Council	Yes	The policy should control no, size, location of marinas to avoid piecemeal, un-coordinated developmnet of the canal network.
Geoff Pullin (Resident-Badby)		Anything you can do to clear the main canals of parked boats the better for the local economy.
Kilsby NDP Steering Group for Kilsby Parish Council	Yes	
Mark Wesley (resident - Daventry) (resident - Daventry)	Yes	Proliferation over last few years means sustainability and water use is kxxxxx <i>(unable to make out last word of sentence)</i>
Naseby Parish Council	Yes	Justification of need in the wider region rather than the District. There appears to be an over supply building up.
Persimmon Homes	No	
Long Buckby Parish Council	Yes	Access, services (public) requirement, residential/temporary use, size, services offered by the site, safety (with particular regard to nearby residents)

Staverton Parish Council	No	
Farthingstone Parish Council	Yes	Ideally the normal planning rules should apply. Developments such as these providing leisure facilities can be important to the local economy, but they need to be developed in a way that enhances the local environment and facilities. They therefore need to be in an appropriate location for road as well as canal links with provision of appropriate utilities and infrastructure.
Tony Dodd (resident - Welton)	Yes	
Welton Parish Council	Yes	Locations determined to avoid massing of marinas; minimum distance from residential areas and other marinas; mitigation measures re pressure on road network, natural environment; value to tourism/local employment in rural areas; facilities to be made available.
Badby Parish Council	No	
David George (resident - Kilsby)	No	
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Francis Jackson Homes	No	
Weedon Bec Parish Council	Yes	Encourage them there is a big demand and they bring jobs, visitors and trade to local businesses
Maidwell with Draughton Parish Council	No	

### Issue 51- Design

Q51a. It is intended that the Local Plan will include a further detailed policy on design. What else should it include further to Policies S10, R1 and R2 of the WNJCS?			
Q51b. Are there particular areas of the District to which particular approaches to design would be appropriate?			
Q51c. If yes please specify where they are.			
Name	Response		
	51a	51b	51c
Boughton Parish Council	Guidelines on self-build homes	Yes	The rural villages as it is vital to retain and protect their individual character and heritage
Braunston Parish Council			Areas containing historic buildings need a sympathetic approach
Brixworth Neighbourhood Plan Steering Group	Must emphasise importance of protecting land important to the character of the settlement. Must emphasise that new development must be in keeping with its surroundings and be of appropriate scale to the settlement.	Yes	In or close to Conservation areas
Hallam Land Management, land at Moulton	There is no need for a further detailed policy on design because Policies S10 and R1 already provide sufficient detail on such matters. If a design policy is required then Paragraph 58	No	

and Long Buckby (Carter Jonas)	of the NPPF provides guidance on the scope and content of such policies.		
CPRE	There should be reference to independent design guides to formulate what is acceptable and in keeping with the local character and amenities. CPRE (working with the Rockingham Trust) will be publishing a design guide in the summer of 2016 which covers these issues.	Yes	All villages with distinct styles, architecture and materials should have new developments in keeping with them.
Crick Parish Council	There are no particular new elements that are suggested to be included. What is needed is that these policies are rigorously enforced to ensure new innovation is included and design reflects its surroundings and not the acceptance of standard estate housing This seems to be generally satisfactory but if previous granted permissions are anything to go by they have not been rigorously enforced to date.		
Gladman – various sites	<p>Whichever approach is adopted, Gladman would caution against any policies being too prescriptive; the Council will no doubt be aware of the requirements set out in paragraph 59 of the Framework, which states: Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.</p> <p>Furthermore, paragraph 60 goes on to add: Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.</p> <p>Finally, paragraph 65 makes it clear that Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).</p>		
Daventry Town Council	The Local Plan should include the provision of open green space within the design guidance.	Yes	Daventry Town- preservation of open green space and sports and leisure facilities.
Geoff Pullin (Resident- Badby)			Off road parking and roads designed in size and direction by consultation with bus operators for as viable as possible reliable bus service.

Guilborough Parish Council			Areas of villages where the neighbourhood plan identifies such a need
Northamptonshire County Council (Heather Webb)	Joint Core Strategy policy S10(j) refers to creating GI networks. New development should not only create new GI but relate to and enhance existing networks. I believe the new policy should be worded accordingly to stress the need to build on what already exists and not simply create isolated GI resources.		
Welton Parish Council	Incorporate points from 9.1 and 9.2.	Yes	Mickle Well Park, Daventry North East SUE, regeneration areas in Daventry, new build within village confines, town centre etc. retail development
Badby Parish Council	Neighbourhood Plan and Planning Policy Statement by Badby Parish Council have already been drawn up and so there is no need to supplement these.	Yes	Areas of outstanding natural beauty and conservation areas come to mind.
David George (resident - Kilsby)	Nothing	No	
Hollowell and Teeton Parish Council	No additions required.	No	
Nikolas Moore (resident - Boughton)		Yes	The ironstone villages throughout the village could be enhanced if new development was of stone and thatch rather than cheap indistinct indentikit brick and tile housing that could be anywhere
Overstone Parish Council		No	
Moulton Parish Council		Yes	
Francis Jackson Homes	What information will this contain? The NPPF stipulates that LPAs should not require developments to conform to particular development styles or tastes, so caution is needed on this being not too prescriptive.	No	
Weedon Bec Parish Council	Please promote more innovative design	Yes	Innovative projects and self build at primary settlements and larger villages could add to the sustainability of villages, bring business to local shops and attract visitors
Maidwell with Draughton Parish Council	Too much of recent development is of a poor design quality. New development should be attractive and should respect or complement the existing character of the area. Proposals which do not meet a reasonable level of design, proportion, quality of materials, and setting should not be approved.	Yes	Rural areas, small towns and villages.

#### Issue 52- Housing Density – Policy H1

Q52a. Further to Policy H1 of the WNJCS it is not considered necessary for this Local Plan to include an additional policy on housing density? Do you agree? Q52b. If no please specify what should be included.		
Name	Response	
	52a	52b
Anthony Davies (resident - Welton)	No	If people choose to live in towns they want easy access to the town's facilities. This means increasing housing density to reduce urban sprawl.

Boughton Parish Council	Yes	
Braunston Parish Council	No	
Brixworth Neighbourhood Plan Steering Group	Yes	
CC Town Planning- Land at Flore	Yes	
Church with Chapel Brampton Parish Council	Yes	
CPRE	Yes	
Gladman – various sites	Yes	Gladman consider that it is not necessary to replicate or elaborate on policies that are in line with those contained in national policy and guidance. Gladman remind the Council of the guidance contained within PPG (Reference ID: 12-010-20140306), which states that: In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.  Any policies on housing density need to be flexible and take into account viability issues to ensure that the deliverability of housing sites is not compromised.
Daventry Town Council	No	
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	Yes	
Welford Parish Council	No	The density of development in villages is critical to it blending. Also need to look at building heights and the tendency to build three storey houses in inappropriate locations.
Welton Parish Council	Yes	
Badby Parish Council	No	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	No	Density should be considered individually on each application above a certain threshold - say around 40 houses or so. The new developments on the west side of Moulton and to a lesser extent at Buckden Fields allowed higher density than the immediately surrounding context - making it unwelcome and fiercely resisted. If development was more in keeping and more attractively landscaped with mature trees and lower density, particularly on the urban fringe and adjacent to low density 1970s housing then it would be more likely to win support. A blanket policy on density is not appropriate and the "efficient use of land" is not sufficient justification for inappropriate high density developments, such as Harlestone Manor, on otherwise outstanding sites that deserve more sensitive schemes at lower density. These would be more likely to win local support and avoid the animosity felt by existing communities having development otherwise forced upon them.
Overstone Parish Council	Yes	

Moulton Parish Council	Yes	
Francis Jackson Homes	Yes	
Weedon Bec Parish Council	Yes	
Maidwell with Draughton Parish Council	Yes	

### Issue 53- Residential Gardens

Q53a. It is not considered necessary to include a policy on the inappropriate development of residential gardens as this is satisfactorily covered elsewhere through existing policies. Do you agree?  
 Q53b. If no please explain your answer.

Name	Response	
	53a	53b
Anthony Davies (resident - Welton)	Yes	
Boughton Parish Council	Yes	
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	Yes	
CC Town Planning- Land at Flore	Yes	
Church with Chapel Brampton Parish Council	No	Over-development of gardens needs stronger wording
CPRE	Yes	
Daventry Town Council	No	Need to consider policy to prevent further development (infill) on new/existing sites. Refer to NPPF advising local authorities to consider setting out policies to resist inappropriate development of residential gardens.
Framptons	No	Should be on a case by case basis
Great Oxendon Parish Council	Yes	
Guilsborough Parish Council	No	Generally do agree but the policy needs to reference village confines

Tony Dodd (resident - Welton)	Yes	
Welford Parish Council	Yes	
Welton Parish Council	No	See 9.6 NPPF suggestions. A separate, specific, robust policy would be beneficial for the district as a whole.
Badby Parish Council	Yes	
David George (resident - Kilsby)	Yes	
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Overstone Parish Council	Yes	
Moulton Parish Council	Yes	
Francis Jackson Homes	No	Recent Government consultations may assist in delivery of housing/support housing on such land in sustainable locations and regard should be had to these - this matter needs to be considered very carefully so as to be sound and not just a blanket restriction implies or read into such land on this basis which is often, by its very nature in very sustainable locations.
Weedon Bec Parish Council	Yes	
Maidwell with Draughton Parish Council	Yes	

#### Issue 54 – Optional Space and Access Standards

Q54a. Should this plan introduce the national described space standard?		
Q54b. If yes what sources of evidence justify this, and to what extent do they suggest the standard should be applied?		
Name	Response	
	54a	54b
Anthony Davies (Resident- Welton)	No	
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	No	

CC Town Planning- Land at Flore	No	
Gladman – various sites		In terms of space standards, the Deregulation Bill 2015 specifies that Councils cannot set any additional local technical standards relating to the construction, internal layout or performance of new dwellings other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings where these are supported by evidence of need and viability.  Furthermore, Gladman would remind the Council to pay careful attention to the requirements set out in paragraph 173 and 174 of the Framework regarding viability and not placing undue policy burdens on developers that prevent the plan from being delivered.
Daventry Town Council	Yes	Unable to comment – but if there is a national standard the local plan should refer to it and seek excellence.
Great Oxendon Parish Council	Yes	Equality – evidence of need based on local demand
Guilsborough Parish Council	Yes	
Home Builders Federation		The question is whether or not the Council is able to justify adoption of the Nationally described space standard. If the Council wishes to adopt this standard it should be justified by meeting the criteria set out in the NPPG (ID 56-020) including need, viability and impact on affordability.
Kilsby NDP Steering Group for Kilsby Parish Council	No	
Messrs Jackson (Landmark Planning)	No	
Mark Wesley (resident - Daventry) (resident - Daventry)	Yes	I am not qualified but believe space to live is vital for well being,
Naseby Parish Council	No	
Gallagher Estates and Jennifer Rowden and Priscilla Knight, Charles Kimbell, Stephen Kimbell and Alexander Kimbell, and Mark Mackaness, Simon Mackaness, Shena Roworth and Oliver Mackaness (Pegasus Group)	No	The Issues and Options Paper invites comments on whether the Local Plan should include a policy relating to optional national space standards. As indicated in the Paper any proposed policy must be clearly justified by evidence and a consideration of viability implications.
Persimmon Homes	No	There is not a need for space standards within the district as it standardizes housing sizes, affecting the markets ability to do this naturally, as people make choices based on their own personal circumstances, relating to affordability, proximity to work etc.  In order for the adoption of new space standards, a proper and rigorous assessment of need should take place, and these standards should go through the consultation process alongside the production of a Local Plan. The NPPF states that the site and scale of development in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Therefore, the cumulative impact of these standards and policies should not put the implementation of the plan at serious risk.  If the District implements new space standards, leading to larger housing, then there will be major consequences to viability, as there will be additional build costs, additional lane take, additional s106 burden and additional parking requirements which all reduce the efficiency of a development.
Tony Dodd (resident - Welton)	Yes	If it is a national space standard, why not adopt it? Why work to lower standards?

Welford Parish Council	no	
Welton Parish Council	Yes	
Badby Parish Council	Yes	The Parish Council is no qualified to comment as it does not have the technical knowledge but would point out that it feels the national standard should be imposed.
David George (resident - Kilsby)	No	
Hollowell and Teeton Parish Council	No	
Nikolas Moore (resident - Boughton)	No	
Overstone Parish Council	No	
Moulton Parish Council	No	
Francis Jackson Homes	No	
Weedon Bec Parish Council	Yes	It would help if you set out the standard for comment as also for next question
Maidwell with Draughton Parish Council	Yes	To prevent poor space standards evident in some speculative volume housebuilding.

Q54c. Should the Part 2a Local Plan introduce the additional technical requirements for access?  
Q54d. If yes what sources of evidence justify this, and to what extent do they suggest the standard should be applied?

Name	Response	
	54c	54d
Anthony Davies (resident - Welton)	Yes	If we wish an inclusive society then access arrangements must foresee all forms of disability
Braunston Parish Council	Yes	
Brixworth Neighbourhood Plan Steering Group	No	
CC Town Planning- Land at Flore	No	
Gladman – various sites		The blanket imposition of such access requirements would be onerous and should only be used in cases where it is clearly viable and strong evidence of need can be demonstrated. Without this test, the viability of new housing schemes could be compromised and the plan would be unable to deliver the required amount of new homes. If the Council were to implement a policy allowing for the optional requirements, it will need to be supported through a thorough viability test of the Local Plan, as required by paragraph 174 of the Framework.
Great Oxendon Parish Council	Yes	As appropriate

Guilsborough Parish Council	Yes	
Home Builders Federation		Thresholds for the provision of specialist housing and a requirement for the higher optional standard of M4(2) adaptable / accessible homes of the Building Regulations. As set out in the NPPG (ID 56-007 and ID 56-003) this policy requirement should be justified based on need and viability tested ;
Kilsby NDP Steering Group for Kilsby Parish Council	No	
Naseby Parish Council	No	
Gallagher Estates and Jennifer Rowden and Priscilla Knight, Charles Kimbell, Stephen Kimbell and Alexander Kimbell, and Mark Mackaness, Simon Mackaness, Shena Roworth and Oliver Mackaness (Pegasus Group)	No	
Persimmon Homes	No	The additional technical requirements for access should only be introduced where properly evidenced according to need and viability. Evidence should be provide to show there is a specific need in the District for the higher accessibility standards to be met on a proportion of dwellings on a particular scheme. This should not jeopardize the overall delivery of the housing requirements in the plan.
Tony Dodd (resident - Welton)	No	
Welford Parish Council	No	
Welton Parish Council	Yes	
Badby Parish Council	No	The Parish Council is unable to answer this question as it is considered irrelevant to Badby village.
David George (resident - Kilsby)	No	
Hollowell and Teeton Parish Council	Yes	
Nikolas Moore (resident - Boughton)	Yes	
Overstone Parish Council	No	
Moulton Parish Council	No	
Francis Jackson Homes	No	
Weedon Bec Parish Council	No	

Maidwell with Draughton Parish Council	Yes	New buildings should set a high standard of inclusiveness for people with disability or with mobility difficulties.
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### Issue 55- Self-Build

Q55a. Further to draft Policy Ho14 in the emerging Housing SPD is a threshold of 500 dwellings appropriate to require a proportion of self-build plots? Q55b. If no please specify an alternative threshold. Q55c. What else should the Local Plan include regarding Self-Build and Custom-Build Housing?			
Name	Response		
	55a	55b	55c
Boughton Parish Council	Yes		Where the building should be located Design standards Impact on the local area
Braunston Parish Council	No	No threshold	
Brixworth Neighbourhood Plan Steering Group	Yes		
Crick Parish Council	No	Self-build houses, which tend to be individualistic and so lending to architectural diversity and often are built using innovative methods of construction and energy use, need to be made available more readily than only on plots of more than 500 houses. In the Daventry area that will mean only a handful of houses at the most. Daventry made much of achieving getting the iCon Centre in Daventry but has not yet been obvious in promoting innovative initiatives in ongoing developments.	
Gladman- various sites			Any policies on Self-Build and Custom- Build Housing need to be flexible and take into account viability issues to ensure that the deliverability of housing sites is not compromised.
Daventry Town Council		Unable to comment- market driven	Unable to comment- market driven
Geoff Pullin (Resident-Badby)		Seems on the high side, but perhaps people don't want to build on a large development, only in small plots of in-filling.	They need to be completed on the outside anyway within a fixed time (say 3 years) so th sire doesn't look like a builders tip for two and a half years!
Great Oxendon Parish Council	Yes		
Guilsborough Parish Council	No	5% for all developments over 20 homes, with clear design quality criteria (to be agreed with the Parish Council) so as to allow for a wider mix of styles and character, and encourage more housebuilding.	
Home Builders Federation	No	Thresholds for the inclusion of self build dwellings the HBF supports self-build / custom build in principle for its potential additional contribution to overall housing supply where this is based on a positive policy approach by the Council to increase the total amount of new housing development and meet an identified and quantified self-build / custom build housing need. However the HBF is not supportive of a restrictive policy requirement approach for the inclusion of such housing on sites over a specified size. This approach provides no additionality to land supply but merely changes production from one to another type of builder. It is suggested that consideration is also given to the practicalities of implementing such a policy	

		requirement including health & safety implications, working hours, length of build programmes, etc. The Council should refer to the East Devon Inspector's Final Report which expresses reservations about the implementation difficulties associated with this sort of policy. It is suggested that any policy to encourage self-build / custom build is subject to viability considerations and specific site circumstances and based on evidence identifying demand for such housing.	
Welton Parish Council	No	200	Ensuring high quality design which is sympathetic to the rest of the development.
David George (resident - Kilsby)	Yes		Don't know.
Hollowell and Teeton Parish Council	Yes		Best practice advice / criteria
Nikolas Moore (resident - Boughton)	Yes		I think this is a bit of a red herring really - self build plots on large resi schemes simply wouldn't work
Francis Jackson Homes	No	As per national planning policy guidance.	
Weedon Bec Parish Council	No	Threshold should be lower	This option should be promoted by the plan as it is becoming increasingly popular and enables people to build something different Allocating just a few plots in a bigger development is not likely to be popular as self builders may not want to conform to traditional building styles and techniques raising issues at the planning application stage that a proposal for self build does not conform to the local building style. Suggest land should be set aside for say 10-20 houses perhaps windfall sites, the proposed canal corridor where self build could become a show piece. Also make safe small brownfield/windfall sites and offer for self build
Maidwell with Draughton Parish Council	Yes		Self build or custom build should be encouraged in smaller scale developments not just those over 500 dwellings or more.

#### Issue 56- Starter Homes

Q56a. Further to draft Policy Ho15 in the emerging Housing SPD what else could the plan include regarding starter homes?		
Q56b. Are there particular issues raised by the proposed Starter Homes duty the Council should particularly consider when preparing this Plan?		
Name	Response	
	56a	56b
Boughton Parish Council	Guidance on Quality and Design	Percentage cost of what starter homes should be offered for sale below market value
Brixworth Neighbourhood Plan Steering Group	Starter homes could be anywhere, but more likely in the larger estates particularly in the SUE's as that is where the maximum facilities will be.	Should be of mixed sizes
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)	Any local policy on starter homes will need to be consistent with any amendments to national guidance on this matter, and should be contained in a development plan document rather than supplementary guidance. There should be flexibility in the requirement for starter homes because they will not be appropriate for some residential developments.	
Chris Myers (Resident- Long Buckby)		I would hope that this policy is closely linked to the Affordable Housing Strategy if this is not already the case. This should be an opportunity to reinvigorate and update the Affordable

		Housing Strategy so that needs continue to be identified and, hopefully, met.
CPRE	It is not possible to comment without details of what the Housing SPD will finally be.	
Gladman – various sites	Government policy on Starter Homes is still emerging so it will be important for the Council to ensure it keeps abreast of developments in this field so that any proposed policies are fully in line with national policy when it is actually published.	
Framptons	It is important to wait for the Housing and Planning Bill to be adopted prior to drafting Starter Homes policy.	
Geoff Pullin (Resident-Badby)	I suppose the government knows the intended consequences but I suspect there will be horrendous unintended side effects.	
Great Oxendon Parish Council		Starter homes in small rural villages
Guilsborough Parish Council	Starter homes can be part of the affordable housing mix, where this is informed by a neighbourhood plan.	
Davidsons Developments Limited (Pegasus Group)	Any policy on Starter Homes will need to accord with national policy as contained within the revised NPPF, as discussed at Issue 58.	
Persimmon Homes	<p>The council should work in a positive and proactive way with landowners and developers to secure a supply of land that is suitable to become Starter Homes exception sites to allow developers to deliver housing to first time buyers. Furthermore, through the development of this local plan, the local planning authority should use the evidence provided and managed by the Home Builders Federation which identifies who may be eligible for Starter Homes developments, as well as who has registered their interest in the scheme.</p> <p>The opportunities that will be provided by the Starter Homes tenure means developers can directly deal with LPA's to deliver much needed affordable homes.</p>	
Farthingstone Parish Council	It is not possible to comment without details of what the Housing SPD will finally be.	
Rentplus (Tetlow King)	In order for the Local Plan Part 2 to be in line with Government policy, it needs to explicitly recognise the introduction of Starter Homes. We note that Policy Ho15 makes no reference to the minimum provision of Starter Homes, Affordable Housing and Intermediate housing that will be required as part of a development. It is important that the Council recognises that the introduction of Starter Homes and other innovative models such as Rentplus rent to buy is likely to require flexibility on tenure mix. Rentplus rent to buy homes can provide a significant boost to site viability, and understanding this will assist in delivering the Plan's policies which should be reviewed to incorporate the emerging definition of affordable housing to include rent to buy. Therefore inclusion of further wording indicating the <u>adoption of a flexible approach</u> to tenure mix would be beneficial.	
Tony Dodd (resident - Welton)	Starter and retirement suitable homes are the highest priority we face.	
Welton Parish Council	Ensure key points in 9.15 are included.	Starter homes initially to meet local needs of residents in Daventry/rural settlements should be a priority.
David George (resident - Kilsby)	Don't know.	Don't know.

Hollowell and Teeton Parish Council	Best practice advice / criteria	No
Weedon Bec Parish Council	Housing for rent, private or social should be promoted especially small developments in villages where house prices are high	Affordable housing is not starter housing in most villages where house prices are generally higher so rent, shared ownership with option to buy and social housing are needed
Maidwell with Draughton Parish Council	Starter Homes should not replace the requirement for affordable housing for lower income groups.	The very substantial discount on the purchase price should be held in perpetuity rather than gifted to the first owner.

### Issue 57- Parish Annex and Local Green Spaces

Q57a. Should the Part 2a Local Plan include a Parish Annex?				
Q57b. If yes do you agree that the Local Plan should include Local Green Spaces in a Parish Annex?				
Q57c. Mindful that it should not repeat policies elsewhere in the Local Plan, what else should an Annex contain?				
Name	Response			
	57a	57b	57C	
Boughton Parish Council	Yes		Yes	Heritage Assets, Listed Buildings, Conservation Areas
Braunston Parish Council	Yes		Yes	Landscape Description and Area Character Assessment
CC Town Planning- Land at Flore	Yes		Yes	
Chris Myers (Resident- Long Buckby)	Yes			Long Buckby is an example of a village that has not opted for a neighbourhood plan. I hope that Long Buckby would be specifically mentioned in a parish annex or have its own separate annex. I also hope that the Parish Council will be encouraged to contribute to such an annex. It would not confine itself to Local Green Spaces but should aspire to be as wide-ranging and robust as a neighbourhood plan. It should include, for example, employment, the role of the station, road capacity, car parking and affordable housing
CPRE	Yes		Yes	Details of particular structures, amenities and features of a parish that should be protected, including reinforcement of consideration of Neighbourhood Plans and Village Design Statements.
Gladman – various sites	In considering whether to introduce further policies in a Parish Annex, Gladman remind the Council of the guidance contained within PPG (Reference ID: 12-010-20140306), which states that: In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. There should be no need to reiterate policies that are already set out in the National Planning Policy Framework.		The Council need to consider whether this is the most appropriate approach for allocating Local Green Spaces. As PPG highlights, designating ‘will need to be consistent with local planning for sustainable development in the area’ and ‘plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making’.  Gladman would remind the Council that paragraph 77 of the Framework makes it clear that the Local Green Space designation should only be used in the following circumstances:	

		<ul style="list-style-type: none"> <li>- where the green space is in reasonably close proximity to the community it serves;</li> <li>- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</li> <li>- where the green area concerned is local in character and is not an extensive tract of land.</li> </ul>	
Daventry Town Council	Yes	Yes	
Great Oxendon Parish Council	Yes	Yes	Linkages to Village Design Statement
Guilsborough Parish Council	Yes	Yes	
Kilsby NDP Steering Group for Kilsby Parish Council	Yes	Yes	Listed buildings by parish.
Messrs Jackson (Landmark Planning)	No		
Mark Wesley (resident - Daventry) (resident - Daventry)	No		
Naseby Parish Council	Yes	Yes	
Persimmon Homes			If designations are to be made, they should be justified and evidenced appropriately.
Ravensthorpe Parish Council	Yes	Yes	An Annex should be used to formalise the Supplementary Planning Guidance adopted by DDC in respect of different parishes - specifically, it should include details of Village Design Statements and similar documents where they exist.
Long Buckby Parish Council	Yes	Yes	
Northamptonshire Police	Yes	Yes	
Staverton Parish Council	Yes	Yes	
Farthingstone Parish Council	Yes	Yes	Details of particular structures, amenities and features of a parish that should be protected. For example, the Joy Mead Gardens and associated buildings in Farthingstone, plus buildings of particular note where there may be local knowledge (for example some residences may have connections with famous and/or notable individuals).
Althorpe Estates (Lucas Land Planning)	No	No	These aspects should be local parish matters, it is not for the district council to impose its views.
Mr DJS & Mrs SE Wilson (residents – Badby)	Yes	Yes	

Tony Dodd (resident - Welton)	Yes	Yes	
Welford Parish Council	Yes	Yes	
Welton Parish Council	Yes	Yes	
Badby Parish Council	Yes	Yes	
Scaldwell Parish Council	Yes	Yes	
Environment Agency		Yes	
David George (resident - Kilsby)	Yes	Yes	
Hollowell and Teeton Parish Council	Yes	Yes	
Nikolas Moore (resident - Boughton)		Yes	
Overstone Parish Council	Yes	Yes	
Moulton Parish Council	Yes	Yes	
Francis Jackson Homes	No		
Weedon Bec Parish Council	Yes	Yes	
Maidwell with Draughton Parish Council			Not relevant to our village.

**Issue 58- Revised NPPF**

Q58a. It is proposed to use this Plan to update Core Strategy policies as required to bring them into line with the revised NPPF when this is published, and the Starter Homes duty when this comes into effect. Is this the right approach?			
Q58b. If no, explain what approach the Council should adopt.			
Q58c. Are there particular issues raised by the proposed NPPF revisions the Council should particularly consider when preparing this plan?			
Name	Response		
	58a	58b	58c
Roseneath Estates Ltd (iceniprojects)		Roseneath supports the Council's decision to update Core Strategy policies as required to bring them in line with the revised NPPF; however, the Council should ensure adequate consultation on the proposed changes occurs.	
Boughton Parish Council	Yes		

Braunston Parish Council	Yes		
Brixworth Neighbourhood Plan Steering Group	No	NPPF revisions should not affect Made neighbourhood plans	
Hallam Land Management, land at Moulton and Long Buckby (Carter Jonas)			The Government has consulted on a housing delivery test in the revisions to the NPPF, to ensure that sites allocated in local plans are delivered to address a housing shortfall in the immediate and short term. It is likely that under the test housing trajectories will be subject to even greater scrutiny. We request that in anticipation of a housing delivery test, the housing trajectory for Daventry District is reassessed. The housing land supply position in Daventry is marginal and is reliant on larger scale developments, and as such the policies related to the supply of housing are vulnerable at appeal. The appeal decisions at New Street, Weedon Bec (Ref. APP/Y2810/A/14/2228921) and Salisbury Landscapes Ltd, Moulton (Ref: APP/Y2810/A/14/2225722) highlight the uncertainty about the future land supply in the District. There is a need to allocate smaller sites that can be delivered quickly.
CC Town Planning- Land at Flore	Yes		It is considered that there is sufficient flexibility and acknowledgement within the Issues and Options document to allow for those proposed changes to the NPPF to be accommodated within the submission version. Clearly the way in which DDC deal with starter homes and the proposed modifications proposed to the Affordable Housing elements of the NPPF are considered to be key issues that the Local Plan will need to consider.
CPRE	Yes		
Gladman – various sites		<p>It is vital that the part 2 Local Plan fully reflects the revised Framework and any requirements relating to Starter Homes once these are published. Of particular importance will be the need to address the proposed changes to the Framework around ensuring housing is delivered on land allocated in plans through the introduction of a 'housing delivery test'. The consultation document on the proposed changes sets out that 'where significant under-delivery is identified over a sustained period, action needs to be taken to address this' and that one approach 'could be to identify additional sustainable sites if the existing approach is demonstrably not delivering the housing required'. The Part 2 Plan will need to include a mechanism for dealing with any sustained under-delivery in a timely fashion.</p> <p>Another area that the Part 2 Plan should consider is the possible widening of the definition of affordable housing 'so that it encompasses a fuller range of products that can support people to access home ownership.'</p> <p>It is proposed that the wider definition includes Starter Homes and the Housing and Planning Bill will introduce a requirement for all suitable reasonably-sized housing developments to include a proportion of Starter Homes. The Plan will need to address how this requirement will impact on the amount of more traditional types of affordable housing that could be delivered, which may entail an adjustment of the housing target to ensure the district's OAN can be met.</p>	<p>It is vital that the part 2 Local Plan fully reflects the revised Framework and any requirements relating to Starter Homes once these are published. Of particular importance will be the need to address the proposed changes to the Framework around ensuring housing is delivered on land allocated in plans through the introduction of a 'housing delivery test'. The consultation document on the proposed changes sets out that 'where significant under-delivery is identified over a sustained period, action needs to be taken to address this' and that one approach 'could be to identify additional sustainable sites if the existing approach is demonstrably not delivering the housing required'. The Part 2 Plan will need to include a mechanism for dealing with any sustained under-delivery in a timely fashion.</p> <p>Another area that the Part 2 Plan should consider is the possible widening of the definition of affordable housing 'so that it encompasses a fuller range of products that can support people to access home ownership.'</p> <p>It is proposed that the wider definition includes Starter Homes and the Housing and Planning Bill will introduce a requirement for all suitable reasonably-sized housing developments to include a proportion of Starter Homes. The Plan will need to address how this requirement will impact on the amount of more traditional types of affordable housing that could be delivered, which may entail an adjustment of the housing target to ensure the district's OAN can be met.</p>
Great Oxendon Parish Council	Yes		

Guilsborough Parish Council	Yes		
Kilsby NDP Steering Group for Kilsby Parish Council	Yes		
Messrs Jackson (Landmark Planning)	Yes		
Barratt Developments, Davidsons Developments, House Trustees Ltd & Lower Thrupp Ltd (Pegasus Group)		Our second observation is in relation to your recent consultation on the proposed Housing SPD. It is our view that the policies your Council is seeking to introduce via that SPD, notably in relation to affordable housing and building standards, should be appropriately included in this Local Plan document and not via the SPD. This will enable the appropriate testing of these policies via independent examination. In particular I note at Issue 58 that the Local Plan will be utilised to update JCS policies to bring them in line with the revised NPPF; we agree that this is the correct approach and thus the SPD cannot be legitimately progressed until this has occurred.	
Davidsons Developments Limited (Pegasus Group)		The government's recent consultation on proposed changes to national planning policy sought views on supporting the delivery of starter homes, amongst other proposed changes, and specifically proposals to amend the definition of affordable housing in national planning policy to include a wider range of low cost homes, including starter homes.  It is our view that the Joint Core Strategy should be updated to address any changes to national planning policy through an appropriate review by the West Northamptonshire Joint Planning Unit.	
Persimmon Homes	Yes		Many issues raised in the proposed NPPF revision consultation document are mentioned in this Local Plan Part 2a Issues Consultation also. As a council, it is particularly important to plan positively and be pro-active in an approach to delivering housing within the district. In the rural areas of Daventry, the council have been positive in their granting of permissions and working with developers. Though the delivery of the rural housing requirements is said to have been achieved, the council should continue to plan positively in these areas, as well as the Daventry urban area.  Overall, the majority of the NPPF revisions are very positive, as Starter Homes are supported by Persimmon Homes as supply will be boosted for all types of housing. The strengthening of policy for development on brownfield land for housing is also supported, as the government continue to promote a consistent message on the delivery of housing on brownfield land.
Staverton Parish Council	Yes		
Farthingstone Parish Council	Yes		
Rentplus (Tetlow King)		As already noted, the Government recently consulted on proposals to broaden the planning definition of affordable housing to include Starter Homes and 'innovative rent to buy' housing in order to encompass a fuller range of products that can support more people into accessing home ownership. Evidence given by the Housing and Planning Minister, Brandon Lewis MP, to the CLG Select committee on 24th February 2016 on that consultation was clear that the Government do not intend to conduct any further consultation on the proposed changes and that changes to the NPPF would be made	

		<i>“over the course of this summer”.</i> Given that the Government intend to implement the proposed changes to the NPPF definition of affordable housing within a short space of time, it would be beneficial for the Local Plan Part 2 to be updated to reflect Government objectives. We agree with the suggested approach.	
Tony Dodd (resident - Welton)		The JCS is being maintained and updated so it will surely be a case of that plan leading and controlling this Part 2A document?	
Delisle Estates Ltd. (Tyler Parkes Partnership Ltd)	Yes		
Welford Parish Council	No		
Welton Parish Council		Can this Plan force change on Plan 1 (WNJCS)? Should it not be the other way round?	
Northamptonshire County Council (Planning Services)		The Issues and Options consultation document raises the issue of the current proposed revisions to the NPPF and that the Part 2a Plan should be used to update affected Part 1 Core Strategy policies. The County Council would caution against an approach that could cause confusion if a minor change to a Part 1 Policy is made via a Part 2a Policy unless this can be clearly signalled. It may be more appropriate for any such change to wait until the Part 1 Core Strategy is reviewed.  At some stage the bringing together of the Local Plan into one combined document for the district would aid overall clarity and would be supported by the County Council.	
Maidwell with Draughton Parish Council		Until we know the final details it is not possible to comment.	Until we know the final details it is not possible to comment.
Environment Agency	Yes		

#### Issue 59- General Question

Q59. Is there anything else that the plan should cover that has not been identified within this document?	
Name	Response
Barby and Onley	The Parish has a number of fields where mobile homes, sheds, old cars, trailers and even a canal boat have been left for many years. This is unsightly and reduces the amenity for neighbours. Currently the Planning Authority cannot take any action to get these “Buildings” moved as they are considered to be temporary.(see attached photo). Please can the future planning policy document have some way of ensuring that after a period of time, so called “Temporary” structures are treated as permanent and can then be subject to planning consent?
Anthony Davies (resident - Welton)	Public awareness and user friendly consultation. I know no one (apart from Parish Councillors) who are aware of this consultation exercise. Should the council make more use of social media? This Response Form has glitches. Surely it should be tested before being released?
Braunston Parish Council	Yes: Access to the Countryside, including footpath & bridleway maintenance, standards and preservation, and limiting landowners’ rights to diversions and closures.

Crick Parish Council	<p>On page 13 there is highlighted the age profile of the residents. That this a growth in the ageing population that needs to be reflected in terms of the development needs both in terms of appropriate housing and services provided.</p> <p>On page 14 it states Crick enjoys good access to bus services to Rugby, Northampton and Daventry. This is not accepted. Crick has a day time service hourly to Northampton and Rugby and a daytime County Connect service to Daventry which needs pre-booking, is first come, first served and costs £40 for the round trip. Anyone without a car, particularly younger residents, cannot therefore access the major settlements for any evening activities like theatre, cinema, clubs, restaurants or gym. This is therefore not a 'good' service.</p> <p>The development of Monksmoor requires improvements to Welton Road to provide better access to the A5 North and also to Long Buckby station together with improved facilities and cycle access as it is developing rapidly into a commuter station.</p>
Gladman – various sites	<p>Although the Plan does not propose to review the OAN for Daventry, the Council will be aware of the implications contained in the West Berkshire judgement<sup>1</sup>, which found that the Inspector in that appeal was entitled to take into account the significant new evidence presented by the appellants around OAN in terms of population and household projections along with job growth forecasts and 'was entitled to depart from the figure in the development plan', as the adopted policy 'no longer provided an appropriate basis for the calculation of a five year supply'.</p>
Northamptonshire County Council (Heather Webb)	<p>West Northamptonshire's current green infrastructure (GI) corridors are illustrated in Figure 6 of the Joint Core Strategy and supported by Policy BN1. The proposed renumbered Objective 12 relates specifically to GI and 'enhancing the existing strategic green infrastructure network, including biodiversity corridors, by incorporating and designing these into Sustainable Urban Extensions (SUEs) at Northampton and Daventry'. It is therefore surprising that there are no questions about green infrastructure and how the Core Strategy policy might be implemented at the district level. This is particularly concerning given that the spatial housing options in Issues and Options document Figure 5 could have implications for the Daventry Spur sub-regional and Newnham – Napton on the Hill local GI corridors. The Local Plan Part 2a (LPP2a) should include policy on how Daventry town's urban expansion will incorporate, secure development contributions for and deliver longterm management for impacted green infrastructure corridors in accordance with Core Strategy Policy BN1.</p> <p>Evidence for a local GI policy should include an analysis of existing GI resources and how those might be incorporated, enhanced and connected within any urban extensions. According to paragraph 158 of the National Planning Policy Framework (NPPF), local plans should be 'based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area'. The GI corridors identified in the Joint Core Strategy were delineated in 2006. Work has since been done on both the various GI themes (e.g. biodiversity, access, landscape) and on GI as a whole, and the evidence base improved. Policy BN1 accounts for this continual advancement by stating that 'existing and identified future networks' should be incorporated into new development proposals (my emphasis). With that in mind the Daventry LPP2a would do well to consider results of a recent county-wide GI analysis conducted by this office. The work identified within each 1km OS grid square in the county, known GI assets across five themes: access, biodiversity, historic environment, landscape and open space. Each theme was analysed first individually and then collectively to identify concentrations of multi-functionality (Figures 1 and 2 appended below). Such work serves to refine older studies and provides a more up-to-date evidence base in line with paragraph 158 of the NPPF.</p>
Home Builders Federation	<p>The Council is reminded that the NPPF (paragraph 154) is explicit that SPDs should not add to the financial burden of development. The Regulations are equally explicit in limiting the remit of an SPD so that policies dealing with development management cannot be hidden in an SPD.</p> <p>Under Question 56 concerning any other matters it is also noted that if the Daventry Local Plan Part 2A is adopted by 2017 only circa 11 years will remain before the end of the plan period rather than the 15 year time horizon specified in the NPPF (para 157). It is suggested that in order for the Council to positively plan for new housing development and its longer term housing needs there should be a review of the adopted WNJCS sooner rather than later and an amalgamation of the Part 1 and 2 Plans into one document as preferred by Government.</p> <p>It is also suggested that the Glossary should include some additional definitions, for example, self build / custom build.</p>
Tony Dodd (resident - Welton)	<p>This document seems to ignore much of the Daventry 2040 masterplan. Is that document now discarded? If so, what is the likelihood that DDC will discard this document too?</p>
Delisle Estates Ltd. (Tyler Parkes Partnership Ltd Partnership Ltd)	<p>The Local Plan should contain a list of rural settlements in the Daventry district and confirm which category each is proposed to be placed in accordance the proposed settlement hierarchy suggested in Policy R1 of the adopted WNJCS.</p>
Welton Parish Council	<p>Stronger links with the 2040 Master Plan.</p>
Northamptonshire County Council (Planning Services)	<p>Green infrastructure: The Part 1 Core Strategy highlights in Figure 6 a Green Infrastructure Network for West Northamptonshire and this is supported by Policy BN1. It is surprising therefore, and particularly due to the number of issues questions in the consultation document, that there is no issues question about taking forward green infrastructure matters from the Part 1 Core Strategy into the Part 2a Plan.</p> <p>The Part 2a Plan should include policies on how urban expansion of Daventry Town should contribute to enhancing the relevant green infrastructure corridors. Housing options B and C in Figure 5 could have implications for the Daventry Spur sub-regional and Newnham – Napton on the Hill local corridors, respectively.</p>

	<p>Further comments on green infrastructure are being forwarded under separate cover.</p> <p>Town Centre Vision: Although it is noted that the Daventry Town Centre Vision (July 2004) is only being used in relation to key sites for continuity purposes, the emerging Part 2a Plan and the town centre sites identified within it will require a fresh consideration of traffic issues within Daventry and any relocation of the bus station.</p> <p>NRDA: The Issues and Options consultation document is silent on the issue of the relationship between this Plan and the proposed Part 2 Plan for the Northampton Related Development Area (NRDA). The generality of the issues and options document, perhaps best exemplified by Figure 2, is that the plan area is coterminous with the Daventry district boundary. However the NRDA Plan was supposed to cover the NRDA, which includes key parts of Northampton Fringe within Daventry district, and so the Plan cannot cover the whole of the district if that is the case. This is therefore rather confusing.</p> <p>The Issues and Options document asks questions about the future growth of Daventry and suggests more favoured directions of growth, particularly via Figure 5. The implication of this is therefore that the allocation identified at Daventry along with the town's urban capacity is not enough to meet needs for the plan period. However if that is the case then this is probably the case also for the NRDA.</p> <p>The recent appeal decision at Welford Road in Boughton parish has not only has effectively extended the boundaries of the NRDA (paragraph 25) but also highlighted the issue of the capacity of the NRDA to accommodate the level of development anticipated. It is therefore surprising that not only is the NRDA relationship/status not clarified in the Issues and Options document but that there is no discussion about how the need for new housing associated with the NRDA but in Daventry district is to be addressed.</p> <p>Although it is not normally the case that matters of soundness need to be raised at issues and options stage, it is clear that unless issues relating to the NRDA and the Part 2a Plan are addressed early on in the Part 2a Plan preparation process then ultimately it is likely that the plan will not meet the test of soundness.</p>
Environment Agency	Any new housing allocations will need to be informed by an up to date water Cycle Study and Strategic Flood Risk Assessment. A Water Cycle Study & Strategic Flood Risk Assessment refresh would ensure that flood risk and water infrastructure can be managed sustainability alongside the expected growth of Daventry and will not ultimately constrain the Local Plan (part 2).