

Daventry District Council

Housing Implementation Strategy

Statement of Consultation

Adopted December 2016



Introduction

This report sets out the consultation undertaken on the Housing Implementation Strategy (HIS).

At its meeting on the 14th July 2016 the Council's Strategy Group resolved that consultation could take place on the HIS.

Consultation

Consultation was undertaken for a six week period ending on 12th September 2016. Developers, Parish Councils, adjoining Local Authorities and other individuals, organisations and companies on the Council's local plan database were notified.

Publicity

The draft HIS could be accessed from the Planning Policy and Consultation pages of the Daventry District Council Website.

Copies were available in all district libraries as well as the Council Offices at Lodge Road, Daventry.

Consultation Responses

21 responses were received. These are set out in appendix A.

Consideration of Responses

The Council carefully considered all of the comments received. A number of changes were made to the document as a result of these responses. These changes are set out in appendix A.

The representations were reported to the Council's Strategy Group on 13th October 2016 followed by Full Council on 8th December 2016 when the document was adopted.

The final version of the HIS can be viewed on the Council's website.

Appendix A: Responses to the consultation on the HIS

No	Respondent		
1	Anglian Water	11	Natural England
2	Northamptonshire Police CPDA	12	Farthingstone Parish Council
3	Althorp Estate	13	BRANE
4	Brixworth Parish Council	14	Pitsford Parish Council
5	Braunston Parish Council	15	Weedon Parish Council
6	Historic England	16	Hallam Land Management
7	Harlestone Parish Council	17	Badby Parish Council
8	Francis Jackson Homes	18	Ms D Litchfield and Mr and Mrs C Banyard Smith
9	Daventry Town Council	19	Barwood Homes
10	Highways England	20	Howkins and Harrison
		21	Southern and Regional Developments Ltd

Note reference to the HLA 2016 Report = the Housing Land Availability Report published in April 2016 and viewable on the Council's website.

Respondent	Comment	Response	Action	
General				
1	Anglian Water Services Ltd	We have no comments relating to the content of the Housing Implementation Strategy. However we would wish to comment further on the allocation sites to be identified by the District Council.	Noted. Anglian Water will be consulted further as the Part 2 Local Plans progress.	No change
2	Northamptonshire Police, Crime Prevention Design	I have read the document fully and can confirm that Northamptonshire Police has no comments	Noted	No change

	Adviser	to make.		
3	Althorp Estate	Firstly may we say we welcome this approach and think the authority have made positive progress towards this vital aspect of forward planning which is to be commended.	Comments welcomed	No change
4	Brixworth Parish Council	The Housing Implementation draft was discussed at a recent Parish Council planning meeting in Brixworth. The Parish Council noted that quarterly monitoring reports are going to be carried out during the year and would like to be able to receive a copy of the reports once they have been completed.	The first quarterly report has been placed on the Councils website in the Five Year Housing Land Supply Section. daventrydc.gov.uk/living/planning-policy. All future reports will, likewise, be placed on the website.	Quarterly reports will be added to the website. Section 9 add 'The quarterly monitoring reports will be placed on the Council's website in the Five Year Housing Land supply Section.
5	Braunston Parish Council	How will the identified area of separation identified on Braunston Neighbourhood plan be adhered to?	This is a not a matter for the HIS to deal with. The area of separation is not included within a 'made' plan so will currently have limited weight in decision making. If it were to be included within a made plan, it will be given appropriate weight to reflect the fact that it was part of the development plan.	No change
5	Braunston Parish Council	Without doubt there is disproportionate and unequal strategy to develop housing stock to Daventry Northeast. This area has already taken its 'fair share' of development including Laing Farm, Middlemore and Monksmoor in conjunction with the proposed Micklewell development.	This is a not a matter for the HIS to deal with as it is not a planning policy document. The Daventry North East allocation is included in the adopted Joint Core Strategy. Any further allocations of housing at Daventry will be a matter for the	No change

			Settlements and Countryside Local Plan, which will be subject to consultation as it progresses.	
5	Braunston Parish Council	<p>Can you provide information of how you have proposed to overcome any physical boundaries or constraints in relation to development to Daventry Town, and South, South-east and South west of the town?</p> <p>Knowing also there is inequality between town and rural planning 33% vs 67%. What steps have you taken to develop housing within identified town sites?</p>	<p>The Settlements and Countryside Local Plan will consider where future allocations in and around Daventry should be. That plan will be subject to consultation.</p> <p>The Council as landowner has disposed of a number of sites over recent years at Middlemore to enable housing development to take place, and is currently in the process of disposing of further sites in that location. It also has landholdings adjacent to the town centre at Eastern Way which it is currently preparing to dispose of through masterplanning and other activities.</p> <p>Also as local planning authority it has determined a number of applications which enable further housing to take place such as the 129 unit scheme at Badby Raod West.</p>	<p>No change</p> <p>No change</p>
5	Braunston Parish Council	The Part 2A Local Plan – Settlements and Countryside in conjunction with Daventry North East account for nearly the entire future	It is not the Council's intention that future housebuilding should only be in rural areas. The Core	No change

		<p>strategy. Can I communicate this directly to rural wards and media outlets that it is the Councils intention to only build within rural areas?</p>	<p>Strategy is very clear that development should be in accordance with an urban focused strategy. That said development will also take place in the rural areas at an appropriate scale. The HIS identifies concerns that the majority of completions to date have been in the rural areas, and identifies a number of actions to seek to address this. In addition the Settlements and Countryside plan will need to grapple with this issue, including by making further allocations at Daventry town.</p>	
6	Historic England	No comments to make	Noted	No change
7	Harlestone Parish Council	<p>HPC welcome the opportunity to comment on the Council's Draft Housing Implementation Strategy and we would wish to retain an ongoing dialogue with the Council.</p> <p>In summary we consider that the strategy needs to be robustly and carefully monitored to ensure that the council's growth strategy/scenario is maintained. HPC are concerned that there appears to be little information regarding a potential "fallback" position or set of tools to ensure delivery in the event that it appears the growth strategy is not being delivered or that delivery is compromised in some way.</p> <p>HPC also raise concerns regarding the lack of</p>	<p>Noted. Likewise the council would wish to maintain an ongoing dialogue.</p> <p>Agree that ongoing monitoring is required, this is already covered in the HLA 2016 Report and the HIS itself.</p> <p>Agreed, that is the purpose of the action plan.</p> <p>The HIS itself has been subject to</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p>

		<p>commentary in the Draft strategy regarding the need for DDC to work with neighbouring authorities and Parish and Town Councils to ensure delivery of the overall strategy.</p> <p>As part of Joint Planning unit we find this unusual and we would wish to see mention in the Strategy regarding the need for and detailed mechanism to enable discussions to take place. For example HPC have had recent experience of the N4 SUE (which falls partly within Harlestone Parish) where neighbouring councils (DDC and SNC) have diametrically opposed views regarding the delivery of a phase of development on that site.</p> <p>Clearly in adopting different views this inconsistency could lead to an adverse impact on the rate of delivery from that development.</p>	<p>consultation with the parish council and further consultation will be undertaken as the Part 2 plan develops.</p>	
9	Daventry Town Council	<p>The Town Council has reviewed the Draft Housing Implementation Strategy document and submit the following comments:</p> <ul style="list-style-type: none"> • The statistical detail is unclear and confusing, the Town Council would like to see date and source of statistics for re-assurance of their reliability to give confidence in the approved strategy. • The rationale and evidence do not demonstrate the need for the type of housing proposed or the need for development within the Town. 	<p>The information regarding completions is from the council's own data sources and is included as an appendix to the 2016 HLA Report.</p> <p>The requirements for the level of housing are included in the Core Strategy. The role of the HIS is to look at implementation issues.</p>	<p>No change</p> <p>No change</p>

		<ul style="list-style-type: none"> • The proposed development does not appear to have referred to the previously published housing requirement of the Town and District. • The strategy lacks attention to 'build mix' providing little social housing and the solution to include a higher percentage of affordable housing doesn't address the issue of affordability and homelessness. • There is no provision for the development and provision of essential infrastructure, both for the new developments and the Town, which provides services to the developments. • Future development should be considered District wide and include details of existing infrastructure and identification of future infrastructure requirements to ensure communities flourish. 	<p>This is not the case, the requirement is that contained in the adopted Core Strategy.</p> <p>This is not the role of the HIS. Policies in this regard are included in the Core Strategy, and further policies may be included in the Settlements and Countryside Local Plan.</p> <p>Again this is a matter for the Core Strategy and Settlements and Countryside Local Plan.</p> <p>Noted.</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p>
10	Highways England	In terms of the process through which the Council intends to maintain its five year supply	Noted	No change

		<p>of housing to meet its housing targets, it is considered that it is not Highways England's position to provide comments.</p> <p>The consultation document makes reference to various sources of housing supply which are anticipated to be forthcoming across Daventry including from Neighbourhood Development Plans. Development set out in these Plans is small in scale and it is expected that these sites would not impact upon the operation of the SRN.</p> <p>It is also noted that allocations set out in the emerging Daventry Local Plan Part 2A (LPP2A) will provide a key source of housing supply for the medium to longer term. Highways England previously provided comments in relation to the issues and options consultation document in March 2016 which set out the need for 511 dwellings to be delivered in Daventry town. Highways England indicated that the potential impacts on the SRN from this level of development should be considered.</p> <p>It is noted in the current consultation document that an additional 300 units have been identified in the 2016 Housing Land Availability (HLA) report, making 811 in total which require allocation. As previously, Highways England considers that the potential impacts on the SRN of this level of development should be considered.</p>	<p>Noted</p> <p>Noted, Highways England will be consulted at various stages in the preparation of the Settlements and Countryside Local Plan.</p> <p>Noted, Highways England will be consulted at various stages in the preparation of the Settlements and Countryside Local Plan.</p>	<p>No change</p> <p>No change</p> <p>No change</p>
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11	Natural England	Natural England does not consider that this Daventry District Housing Implementation Strategy poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.	Noted	No change
12	Farthingstone Parish Council	We do not have the expertise to comment on the 5 year housing supply methodology, but we feel that there should be continuous monitoring of the 5 year land supply. In addition, we feel that efforts should be made to ensure that rural communities do not continue to provide for new housing far in excess of the housing needs set out in the West Northamptonshire Joint Core Strategy.	Noted. Monitoring will continue to be undertaken.	No change
13	BRANE	The emerging Brixworth Neighbourhood Plan allows for windfall development within the village. Past experience shows that this may well result in over 100 new homes being approved by 2029. This alone will further strain the infrastructure. Is the JCS already obsolete ? The target of 2360 new homes in the rural areas of the District has already been met. There will inevitably be substantial windfall developments in villages up to 2029 although hopefully this will be better controlled in villages which have produced a Neighbourhood Plan than previously. What is it that now requires more homes to be built ? The target included in the JCS satisfied the appropriate tests and resulted in the inclusion of policy R1.	The Core Strategy requirement is not a ceiling, however as noted elsewhere now that the rural housing requirement has been met the latter part of policy R1 is now engaged. Further development may be appropriate in certain circumstances for example to meet a need for affordable housing.	No change

		<p>2 How can villages like Brixworth be expected to cope with further development ? The problems faced by Brixworth residents and those of nearby villages are well known and documented. Traffic congestion in the village and on the roads around it, which will soon be even worse due to nearby developments at Boughton and Moulton, lack of parking places, a primary school extended to hold 525 pupils on a small site and unlikely to cope with even the current development, and a shortage of secondary school places for older pupils. Even the new surgery is of limited benefit as it will have to serve over twice the number of patients the present one was designed for plus two new, large, care facilities.</p>	<p>Comments noted, it is not the role of the HIS to propose further development in Brixworth, and this is not being suggested. Brixworth is well advanced in preparing its Neighbourhood Plan, and this will have significant weight, once made, in decision making.</p>	<p>No change</p>
14	Pitsford Parish Council	<p>No observations to make</p>	<p>Noted</p>	<p>No change</p>
16	Hallam Land Management	<p>The 'Background' section of the document explains that it only relates to the housing supply in the non-Northampton Related Development Area. It would help to identify the associated document that identifies the housing supply within the NRDA.</p>	<p>Work on a Northampton Related Development Area document is being led by Northampton Borough Council with input from Daventry and South Northamptonshire Councils.</p>	<p>Add the following to the end of the background section</p> <p><i>'A separate report is being produced for the Northampton Related Development Area'.</i></p>
17	Badby Parish Council	<p>The group which has already met generally felt that this a robust draft which will allow DDC to</p>	<p>Noted</p>	<p>No change</p>

		deliver the expected requirements for housing supply into the future.		
20	Howkins and Harrison	<p>To have a block on new housing development in the rural area (unless meeting the tough criteria under Policy R1 of the Core Strategy) until 2029, which is effectively what the strategy advocates, seems to me to be at odds with perceived (and widely reported) lack of housing growth. Without steady new housing growth in the villages, there is a danger that there will be no relief on housing prices, that settlements will stagnate with an ageing population with a consequential threat to essential services and facilities making them unsustainable places to live – contrary to the national objective of delivering sustainable development.</p> <p>There is also a danger that if you do not allow new housing in the rural area in a managed and considered way over the plan period, Daventry District could experience, at some point, a similar housing gold rush as was experienced in Stratford district following the end of the rural moratorium, which was difficult to manage and unplanned in a strategic sense.</p>	<p>The HIS is an implementation strategy and it does not therefore introduce any new policies.</p> <p>The policies in the Core Strategy are not at odds with the NPPF. They have been tested through an examination process and the inspector has found them to be consistent.</p>	No change
21	Southern and Regional Developments Ltd	The Council's strategy includes reference to the Core Strategy development strategy and	Noted. The HIS is an <u>implementation</u> strategy, not the	No change

		<p>housing delivery levels as appropriate. The windfall rates and lapse levels relied upon are based upon monitored data since the start of the plan in 2011, providing a snapshot of the local housing market following a national recession. Although the market environment over the period of recession could be considered to influence housing delivery and lapses detrimentally, the Strategy's commitment to monitor these rates continually over the plan period offer the potential for these rates to be varied in the future.</p> <p>As housing delivery increases in the local market and sites are built out, the potential for market influences to affect the disposal of sites and sales through reduced rates must be acknowledged as a possibility. The potential that the District has is to rely upon its proposed housing strategy to deliver a varied portfolio of sites, focusing growth within Daventry and therefore strengthening the local housing market.</p> <p>The Strategy's expected future completions should however recognise that the 5 year housing supply is only the first stage of the housing strategy, which as the Framework advises at paragraph 47 should also identify a supply of specific, developable sites / broad locations for growth in years 6 – 10. The principle of the 5 year housing land supply is often perceived to be a rolling supply of deliverable sites, with the intention to enable housing delivery and boost housing supply. In order to deliver the sites for years 6 to 10 it is</p>	<p>plan itself. The Core Strategy already identifies sites for delivery including over the longer term and the Settlements and Countryside will make further allocations for Daventry town.</p> <p>As work progresses on the part 2 plan the Council will work with promoters of sites to ensure that those sites which are eventually allocated can come forward as soon as possible.</p>	
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		<p>often necessary to forestall with Master planning of allocations and hybrid applications to ensure site delivery.</p> <p>Accordingly, S&R would advocate that sites to be allocated and relied upon through the Part2A Local Plan should be subject to early master planning and discussions with the Authority to ensure agreement on principles is established. Such front loading of the process would significantly enhance the potential of the sites to be allocated and provide reassurance on their delivery. This approach is preferred in favour of the Strategy's reliance upon over-provision in previous years dating back, to before the Framework and its proposal to significantly boost the supply of housing.</p> <p>Instead, it would be preferable for the strategy to 'bank' the previous level of oversupply as it helps to justify the 5% buffer advocated, and plan to meet the District's housing needs in the most sustainable manner and without artificially cramping housing delivery in the later years of the plan period. Such a proposal would conflict with Central Government's intention of maintaining a housing supply as boosting housing supply at the present an into the future. The proposal to artificially reduce annual delivery rates later in the plan period could also be considered to have a detrimental effect upon the sustained delivery of affordable housing units. As such the Core Strategy housing trajectory should be retained later in the plan</p>		
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		period in order to ensure housing and infrastructure is provided in a sustained manner over the whole of the plan period, exceeding the Core Strategy housing requirement if necessary.		
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Page 6 - Section 2 - Components of supply

7	Harlestone Parish Council	<p>HPC note the various components of supply and the indications as to potential susceptibility of these to change over the plan period. HPC consider that it is crucial that the District Council closely monitors these components to try and be more proactive in assessing changes to housing supply. HPC are concerned that changes to these components from wider economic and political changes (i.e. impact of Brexit, wider economic scenarios, changes to planning policy at national level) could impact upon the ability to deliver housing and consequently affect the 5-year supply of housing, placing more pressure on unsuitable sites to come forward for development in an ad-hoc manner.</p> <p>We therefore wish DDC to be proactive in their monitoring of wider issues not just local supply and delivery.</p>	<p>The Council's Officers monitor other sources of information e.g. various reports that comment on national housebuilding activity and announcements by housebuilders about their view of the state of the market. These are helpful in understanding the wider context and potential for impacts locally, but they do not necessarily provide a clear picture of the housing market as there is such as divergence of views and commentary. An example being Brexit where a wide range of views have been expressed about potential impacts on the level of housebuilding, but there is currently no clear picture as to its impact.</p>	No change
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Page 6 – Windfall Rates

3	Althorp Estate	We are hopeful that the Part 2 Local Plan will be	As noted in the HIS, the expected	No change.
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		<p>speedily implemented: when this plan is in place we are of the measured view that windfall will decrease, as this will be the first time since 1997 that the district has complete and up to date local plan and policy coverage. We therefore question the comments made and the amount that in future windfall will play. Following the arguments the figures should really relate to year 6 onwards of the process.</p>	<p>contribution from windfalls is based on locally specific information and therefore provides a reliable source of evidence for this element of the supply. Windfall sites continue to come forward; therefore it is not clear why the respondents feel no provision should be made until year 6. The rate at which windfall sites come forward will continue to be monitored and future assumptions will reflect any changes in that rate.</p>	
8	Francis Jackson Homes	<p>Whilst it is accepted that the windfall rate is based on historic data, the planning policy context has now changed dramatically with the primary development plan document no longer being the 1997 Local Plan (as the HLA Report notes this is based on the last 8 years of data), but instead the WNJCS which was adopted in December 2014.</p> <p>As the operative policies on development in the rural areas, and in particular the final paragraph of policy R1 is deemed engaged by the LPA, the circumstances under which 'windfall' development may be permissible are materially changed and significantly reduced given this recent shift in planning context, as a result of the Council stating the rural areas housing requirement has been surpassed within the context of this policy.</p> <p>As a result, the assumption that this figure will continue at historic levels fails to take account of</p>	<p>It is accepted that the Core Strategy policies could have an impact on some elements of this source of supply, however there are also other matters which might to some degree at least offset this reduction, such as the introduction of further permitted development rights. It is agreed that this is a matter to carefully monitor, but at this stage there is no case to reduce the assumptions in the way suggested.</p>	No change

		<p>this changed policy position – our view is that this figure should be reduced to around 1/3 of the historic levels to circa 30 dwellings per year until such time that new empirical data produced within the context of the current development plan position becomes available and can be justified with suitable new monitoring data that reflects the current development plan context. The first full year of monitoring data for this will be 2016 to 2017.</p> <p>Table 3 - the urban/rural split also needs updated suitably on this basis.</p>		
18	Ms D Litchfield and Mr and Mrs C Banyard Smith	<p>Paragraph 48 of the NPPF states that local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The Council states that its allowance of an average of 89 units per annum for the last 3 years of the 5 year period remains reasonable. It is argued that this figure needs to be reduced slightly in order to reflect a more robust position. In an appeal decision in Somerset (APP/R3325/A/12/2170082) the Inspector noted that by definition, the supply of windfall sites in an authority area will reduce over time. The Inspector stated: <i>‘...with no significant changes in circumstances, the number of opportunities for windfall</i></p>	<p>Noted, but there is no evidence locally that this source of supply is reducing; fluctuations in delivery have reflected the strength of the housing market rather than any issues about supply. Also account has to be taken of potential new sources of supply such as that from extended permitted development rights.</p>	No change

		<p><i>developments coming forward, by definition, decreases in time. While I conclude the historic trend provides compelling evidence that there would be a reliable source of supply in the future, in my opinion a moderate reduction should be made to ensure the allowance is realistic.'</i></p>		
19	Barwood Homes	<p>Paragraph 48 of the NPPF states that local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.</p> <p>The Council states that its allowance of an average of 89 units per annum for the last 3 years of the 5 year period remains reasonable. It is argued that this figure needs to be reduced slightly in order to reflect a more robust position. In an appeal decision in Somerset (APP/R3325/A/12/2170082) the Inspector noted that by definition, the supply of windfall sites in an authority area will reduce over time. The Inspector stated: <i>'...with no significant changes in circumstances, the number of opportunities for windfall developments coming forward, by definition, decreases in time. While I conclude the historic trend provides compelling evidence that there would be a reliable source of supply in the future, in my opinion a moderate reduction should be made to ensure the allowance is</i></p>	See response to 18 above	No change

		<i>realistic.'</i>		
20	Howkins and Harrison	In arriving at a figure of 8% supply of housing from windfall development, has the Council factored in the impact of policy R1 and engagement of criteria i) to v) of that policy on windfall development? The 8% figure has been arrived at based on data from previous years when criteria i) to v) were not engaged and development within village confines was acceptable in principal. Engagement of the five criteria has made it difficult to secure planning permission in locations that would have otherwise been acceptable prior to the Council meeting its 5 year supply. The Council may see a substantial drop in windfall supply as a result.	See response to 8 and 18 above.	No change
Page 6 – Lapse Rates				
3	Althorp Estate	We agree and are pleased that this information is now being collected. This makes it easier for all concerned to clarify the housing supply.	Comments welcomed.	No change
18	Ms D Litchfield and Mr and Mrs C Banyard Smith	The Council applies an allowance of 20 units per annum for future potential lapsed permissions. Over the 5 year period, this equates to a total of 100 dwellings. Whilst it is appreciated that this data is based on actual historic lapsed permissions, the figure adopted by the Council represents approximately 3% of its deliverable supply figure. In an appeal in Groby, Leicestershire in March 2015, an Inspector	The Council makes a site by site assessment of sites of 15 units or more, so this already factors in the potential for slippage on sites, therefore there is no need to include a further discount for this point.	No change

		<p>considered the Council's allowance of a 4% lapse rate, indeed this was based on historic lapse data too, and concluded the following: <i>'The Council's figure of 4% for larger sites is based on records of the rate of lapses of planning permission, but the appellants argue that sites may also be delayed during the currency of a planning permission. Whilst there is no evidential base for their preferred figure of 10%, there are examples of a discount at this level being accepted in other appeals, and it is not wholly out of keeping with the level of uncertainty which is a characteristic of housing assessments.'</i></p> <p>Furthermore, the Council introduced CIL in September 2015; particularly in respect of smaller sites where minimal s.106 contributions would have previously been applied, it is considered that the introduction of standard CIL charging rates could significantly impact development viability. It is considered that this could affect the lapse rate on many smaller sites.</p>		
19	Barwood Homes	<p>The Council applies an allowance of 20 units per annum for future potential lapsed permissions. Over the 5 year period, this equates to a total of 100 dwellings. Whilst it is appreciated that this data is based on actual historic lapsed permissions, the figure adopted by the Council represents approximately 3% of its deliverable supply figure. In an appeal in Groby, Leicestershire in March 2015, an Inspector considered the Council's allowance of a 4%</p>	See response to 18 above.	No change

		<p>lapse rate, indeed this was based on historic lapse data too, and concluded the following: <i>'The Council's figure of 4% for larger sites is based on records of the rate of lapses of planning permission, but the appellants argue that sites may also be delayed during the currency of a planning permission. Whilst there is no evidential base for their preferred figure of 10%, there are examples of a discount at this level being accepted in other appeals, and it is not wholly out of keeping with the level of uncertainty which is a characteristic of housing assessments.'</i></p> <p>Furthermore, the Council introduced CIL in September 2015; particularly in respect of smaller sites where minimal s.106 contributions would have previously been applied, it is considered that the introduction of standard CIL charging rates could significantly impact development viability. It is considered that this could affect the lapse rate on many smaller sites.</p>		
Page 6 – Expected Future Completions				
3	Althorp Estate	<p>We have concerns about "assumptions" made in the context of housing completions.</p> <p>The best way forward is to avoid assumptions and practice continuous monitoring and updating of completions: the deliverability of housing is the fundamental consideration here.</p>	<p>In looking to the future (which the HIS has to do) it is necessary to make assumptions. These are based on regular monitoring, including quarterly monitoring of sites of 15 or more units, and an</p>	No change

		<p>A quarterly monitoring of housing completions is an essential part of the 5 year housing supply process taken together with a continuing dialogue with agents and housing providers.</p> <p>Annual monitoring really leaves too late to address supply issues and quarterly monitoring allows any emerging concerns on housing supply to be noted and action taken to ensure the required housing supply can be a measured timely response rather than a 'kneejerk' corrective action.</p> <p>The current plan completions in the West Northamptonshire Joint Core Strategy (JCS) with respect to Daventry District of course start from a very low base and the real housing challenges are the years 2016 to 21. Table 1 of Page 7 is we feel slightly misleading as it mixes actual/ expected completions and the wrong impression could be given.</p> <p>The appropriate word to be inserted here is necessary completions. We suggest that Table 1 is altered to reflect that wording - as after all that is the requirement per year.</p>	<p>understanding of deliverability issues from liaison with developers.</p> <p>Agree, and as noted in the HLA 2016 Report this is being undertaken for sites of 15 units or more. The quarterly reports will be placed on the Council's website.</p> <p>As noted above this is being undertaken on a quarterly basis for sites of 15 units or more so this will give early warnings about any changes in delivery.</p> <p>Table 1 clearly identifies that completions from 2011 to 2016 are actual. From 2016 the completions cannot be anything other than expected, so it is not accepted that the wrong impression is being given.</p> <p>The heading of the second column is very clear that it is setting out the housing trajectory in the Core Strategy. The 'requirement' is expressed in the Core Strategy for the plan period not each year.</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p>
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		<p>The written commentary on Page 8 also needs to be changed as it states that the necessary completions will be met. That is wrong as it is clearly an assumption that they will be met rather than fact.</p> <p>We find your current Table 2 useful and in our view it should be placed in the text before Table 1 and renumbered as it shows the agreed housing trajectory of the JCS and is useful as the introduction to the recent past year on year completions.</p>	<p>Agree it would be useful to clarify that this is an assumption rather than fact.</p> <p>Table 1 also shows the housing trajectory for the plan period. There would be no benefit in moving table 2 before table 1.</p>	<p>First paragraph on page 8 add 'assumptions about' after 'based on current'.</p> <p>No change</p>
16	Hallam Land Management	<p>The 'Expected Future Completions' section of the document identifies the potential sources of future housing land supply. The future land supply has been considered at recent appeals, including New Street, Weedon Bec, Northamptonshire NN7 4QS (Appeal Ref: APP/Y2810/A/14/2228921) and Salisbury Landscapes Ltd, Boughton Road, Moulton, Northampton NN3 7SQ (Appeal Ref: APP/Y2810/A/14/2225722). In both cases, the appeals were allowed despite the Council being able to demonstrate a five year housing land supply. The appeals were allowed because the sites and proposed developments were assessed as sustainable, and the housing trajectory relies on some larger developments and was therefore challenging. Paragraph 43 of the New Street Weedon Appeal provides</p>	<p>The appeal decision referred to at Weedon has been quashed by a decision of the High Court and therefore is not a reliable source.</p> <p>It is accepted that the NPPF refers to the need to boost the supply of housing, but this is not unfettered – the NPPF goes on to explain what this means. It includes maintaining a five year supply. The NPPF does not make any reference to having to exceed the 5 year requirement, indeed to do so could be unsustainable as it could have an adverse impact on strategies for neighbouring authorities.</p>	<p>No change</p>

		<p>conclusions on the housing land supply, and states:</p> <p><i>“On the evidence before me at the Inquiry, I therefore conclude that the Council could deliver some 5.2 years HLS. It follows that the exclusion of policies for the supply of housing, in NPPF 49, should not apply. Nevertheless, the numbers in the JCS are not intended to be a maximum and the aim of policy in NPPF 47 is to boost significantly the supply of housing. It follows that just because the Council can meet its targets does not mean that more housing should necessarily be refused. Rather, the scheme would help the Council achieve what it recognises to be a challenging trajectory.”</i></p> <p>We request that the findings of the Weedon and Moulton appeals on land supply matters are referred to in the Housing Implementation Strategy document, because the delivery of the housing trajectory is challenging, there is some risk is just meeting the five year housing land supply requirement rather than comfortably exceeding it, and the aim of national guidance is to boost significantly the supply of housing.</p>		
18	Ms D Litchfield and Mr and Mrs C Banyard Smith	The Council state that completions over next five years will <i>‘comfortably exceed the CS requirements’</i> . The Council states that supply	The HIS identifies potential risks of implementing the strategy and identifies actions to address this.	No change

		<p>expected to fall below requirement from 2021 onwards. It is stated that the deficit will be offset by overprovision in previous years (2011-2021). However, there appears to be no contingency strategy in place should the sites fail to come forward as anticipated. The Council states that further sources of supply will be forthcoming during the later stages of the plan period; each of these potential sources are assessed in more detail below.</p>		
19	Barwood Homes	<p>The Council state that completions over next five years will '<i>comfortably exceed the CS requirements</i>'. The Council states that supply expected to fall below requirement from 2021 onwards. It is stated that the deficit will be offset by overprovision in previous years (2011-2021). However, there appears to be no contingency strategy in place should the sites fail to come forward as anticipated. The Council states that further sources of supply will be forthcoming during the later stages of the plan period; each of these potential sources are assessed in more detail below.</p>	See response to 18 above.	No change
Page 8 - 5% or 20% buffer as per NPPF Paragraph 47				
4	Brixworth Parish Council	<p>It is noted that DDC is confident that the authority can maintain its 5 year land supply and</p>	Noted	No change

		will not be subject to the criteria in para 47 of the NPPF which suggests that 20% should apply where consistent under-delivery occurs.		
Page 10 – Section 3 - Additional Future Sources of Housing Supply:				
Page 10 - Brownfield Register – Permission in Principle:				
18	Ms D Litchfield and Mr and Mrs C Banyard Smith	<p>The Council states that <i>'it is expected that some sites will come forward for inclusion in the register, and will subsequently be developed.'</i></p> <p>Although the Council do not expect that a significant supply of housing will come from this source, it is considered that any reliance at all on supply from this source is untested and therefore unreliable. Permissions in Principle granted through a Brownfield Register are an unreliable source of further supply since a) secondary legislation is required in order to finalise the process and given current Government priorities, there is no indication when this legislation may be forthcoming; and b) granting of Permission in Principle won't allow developers to commence development; approval of Technical Detail Consent would still be required and there is some debate as to whether the Permission in Principle approach will increase the likelihood of existing, as yet undeveloped, brownfield sites coming forward for development any quicker than they would through the current planning system.</p>	The Council does not include any expected completions from this source currently. Reference to this source in the HIS was to highlight that it is a further source of supply in the future.	No change
19	Barwood Homes	The Council states that <i>'it is expected that some</i>	See response to 18 above.	No change

		<p><i>sites will come forward for inclusion in the register, and will subsequently be developed.'</i></p> <p>Although the Council do not expect that a significant supply of housing will come from this source, it is considered that any reliance at all on supply from this source is untested and therefore unreliable. Permissions in Principle granted through a Brownfield Register are an unreliable source of further supply since a) secondary legislation is required in order to finalise the process and given current Government priorities, there is no indication when this legislation may be forthcoming; and b) granting of Permission in Principle won't allow developers to commence development; approval of Technical Detail Consent would still be required and there is some debate as to whether the Permission in Principle approach will increase the likelihood of existing, as yet undeveloped, brownfield sites coming forward for development any quicker than they would through the current planning system.</p>		
Page 10 - Permitted Development Right Sites:				
3	Althorp Estate	<p>Representations were made by us against the prospect of the introduction by the district council of Article 4 restrictions on rural buildings in the Part 2 (a) Local Plan consultations. We feel strongly that there is no need to go against current Government planning policy and we wait for a consultation response on this issue.</p>	<p>Noted – this is not a matter for the HIS, but will be addressed as the Part 2 plans progress.</p>	No change

3	Althorp Estate	<p>It is worth noting nationally as part of the wider economic picture that the number of barn conversions has fallen by 25% over the past year as developers have suffered from a lack of funding (The Saving Stream Report L/8/2016 refers).</p> <p>We are of the view that market signals appear to indicate that this is a reducing aspect of rural housing land supply.</p> <p>The worry is that housing supply throughout the wider market could follow this downturn-hence one of our concerns regarding the 'large' Daventry Town housing allocations / market.</p>	<p>Noted. The regular monitoring of development activity will reveal if there is any downturn in the supply from this source locally.</p> <p>There is no evidence that this is happening locally from monitoring of what is happening in the district.</p> <p>Noted, again if this were to be the case locally it would be revealed through on-going monitoring.</p>	<p>No change</p> <p>No change</p> <p>No change</p>
Page 10 Part 2 A Local Plan				
3	Althorp Estate	We wait with interest the Land Availability Assessment regarding Daventry Town.	Noted.	No change
4	Brixworth Parish Council	<p>The reference to issue 22 is also noted to the Part 2A Settlements and Countryside consultation conducted in January 2016 - relating to "the need to explore for further housing in the rural areas".</p> <p>The Steering Group find this reference puzzling as the Joint Core Strategy sets out the target for housing in the rural areas as 2360 in the period of 2011 to 2029. This figure has been met from a combination of building and permissions granted for dwellings to be completed in the time period. So why examine further land allocations</p>	The rural housing requirement has already been met, and R1 does already apply. The rural requirement is not however a ceiling and it may be that in certain circumstances it is appropriate to plan for further housing e.g. to meet an identified local need for affordable housing.	No change

		<p>for potential further housing? Surely Policy R1 should now be applied.</p> <p>In addition in the case of Brixworth, the Steering Group feel that other than infill within the confines as described and agreed by the Examiner in the Neighbourhood Plan, it is difficult to justify further expansion of the settlement in the lifetime of the emerging Local Plan due to the pressure on essential services, such as schooling.</p>	Noted.	No change
7	Harlestone Parish Council	<p>HPC note the increase in the potential allocation of 811 homes in Daventry town, 300 more than originally anticipated. HPC are concerned that there has been a significant increase in the predicted demand (it represents almost a 60% uplift) and queries why this underestimate occurred in the first place, does it raise questions about predicted/anticipated growth scenarios in other areas in the district, including rural areas.</p> <p>HPC also note the implied emphasis on Neighbourhood Planning and would like to place</p>	<p>The revised figure does not represent either increased demand or any underestimate. The reason for the increase is explained in the HLA 2016 report which is referred to in the HIS - it is as a consequence of progress on the Daventry North East extension being slower than was anticipated when the 2015 report was produced.</p> <p>This additional requirement for allocation has been identified as a consequence on ongoing monitoring activity which the Parish council has, elsewhere in their response, encouraged the council to do.</p> <p>The Council will support parish councils in preparing their</p>	<p>No change</p> <p>No change</p>

		on record that in the event that this is a route HPC decide to explore then they would look forward to support from DDC in compiling their own Neighbourhood Plan	neighbourhood development plans	
8	Francis Jackson Homes	On page 10 it is stated that the Settlements and Countryside LP will not be adopted until 2018, but graph 1 shows delivery of sites from this within the year 2017/2018. The graph appears slightly overoptimistic on this basis as these may only just be allocations at that point in time, not having planning permission, conditions discharge, Section Agreements in place, etc. that would facilitate actual delivery on the ground.	Graph 1 shows the components of five year land supply reports for each year, not what will actually be completed in that year. So in the report for 2017/18 the supply will include sites that are expected to be delivered over the next five years – so it is reasonable to assume that there will some contribution from sites allocated in the Settlements and Countryside Local Plan.	No change
8	Francis Jackson Homes	<p><u>Actual Completions</u></p> <p>As a general note, we remain sceptical given that over the last 5 years of monitoring data, actual completions across the District have averaged 274 per annum (based on Table 2 on page 8/9), that actual delivery rates moving forward - as set out on table 1 of page 7, will be as high as expected.</p> <p>The completion of nearly 800 units in 2018-2019</p>	<p>It is accepted that there will need to be a significant increase in delivery to achieve the expected completions in the trajectory. However there are now significantly more sites across the district to provide for an increase. Ongoing monitoring will identify if the expected completions are actually achieved.</p> <p>The 800 units referred to are based</p>	No change

		<p>given market saturation levels, Brexit implications, financial uncertainty in the coming years, etc. seems a huge leap from the historic average (nearly 3 times as many) that the local housing market area is highly unlikely to be able to sustain, even if the development sector could provide this level of completions (and of course sell that many houses all competing with each other) within a small geographic area. We therefore have significant issue with the suggested delivery rates for the years 2017 to 2023 as set out in this report accordingly.</p>	<p>to a large degree on feedback from promoters and developers i.e. it is what they expect to deliver. It is important to note that this level of completions is not required to meet the housing trajectory expectation which is 590 for 2018/19.</p>	
15	Weedon Bec Parish Council	<p>We remain puzzled by the stated need for an additional 300 homes to be built in Daventry town. It appears that this figure has been identified only in the last 6 months and the current document does not appear to show evidence of need or demand for more housing in Daventry town. <i>Please would you explain how this new estimate has been arrived at and where the evidence for 'need' has come from?</i></p>	<p>The revised figure does not represent increased demand; it is required as a result of a revised (lower) expectation regarding delivery on the allocation at Daventry North East. In order that we can provide for the housing requirement in the plan period set out in the Core Strategy additional provision will need to be made.</p>	No change
18	Ms D Litchfield and Mr and Mrs C Banyard Smith	<p>The Council states that the Local Plan Part 2A: <i>Settlements and Countryside</i> will provide an additional source of supply for the medium to longer term part of the plan period. The Council also states that a further potential source of supply is sites coming forward through Neighbourhood Development Plans. It is considered that most Neighbourhood Plan areas will avoid allocating housing provision over and above that which is allocated/directed</p>	<p>The Council's supply currently only includes those sites listed in the HIS. This totals just 48 units. Of these 3 have the benefit of planning permission and 41 have the benefit of a resolution to grant permission subject to the completion of a section 106 agreement. This is already covered in the HIS.</p>	No change.

		<p>to its settlements via the Local Plan Part 2A. As such, the Council should adopt a cautious approach in ensuring that sites allocated through Neighbourhood Plans and also broad allocations directed to specific rural settlements through the Local Plan Part 2A are not double-counted.</p> <p>Furthermore, it should also be acknowledged that the Neighbourhood Plan assessment process is far less robust than the examination process for Local Plans set out at para 182 of the NPPF. As such, it is likely that many of the sites allocated through a Neighbourhood Plan may be undeliverable or unviable. As such, any reliance on this source of supply is unreliable.</p>		
19	Barwood Homes	<p>The Council states that the Local Plan Part 2A: <i>Settlements and Countryside</i> will provide an additional source of supply for the medium to longer term part of the plan period. The Council also states that a further potential source of supply is sites coming forward through Neighbourhood Development Plans.</p> <p>It is considered that most Neighbourhood Plan areas will avoid allocating housing provision over and above that which is allocated/directed to its settlements via the Local Plan Part 2A. As such, the Council should adopt a cautious approach in ensuring that sites allocated through Neighbourhood Plans and also broad allocations directed to specific rural settlements through the Local Plan Part 2A are not double-counted.</p> <p>Furthermore, it should also be acknowledged</p>	See response to 18 above	No change

		that the Neighbourhood Plan assessment process is far less robust than the examination process for Local Plans set out at para 182 of the NPPF. As such, it is likely that many of the sites allocated through a Neighbourhood Plan may be undeliverable or unviable. As such, any reliance on this source of supply is unreliable.		
21	Southern and Regional Developments Ltd	<p>S&R support the recognition within the Strategy that further contributions to the housing supply are expected through Part 2A of the Local Plan and the housing allocations envisaged. As the housing delivery to date has satisfied the Core Strategy housing requirements the Strategy seeks a 5% buffer level. What is essential is that the focus upon the first 5 years of the plan and the apparent successful delivery to date does not negatively influence the requirement to plan for the next five years and assure that a rolling supply of development sites are available to the market.</p> <p>The reliance of the strategy on previous oversupply to reduce the housing trajectory levels in the later years of the plan period are not considered to accord with the Framework's advice in respect of bolstering housing delivery and Central Government intention for such policy to significantly boost the delivery and supply of housing.</p> <p>However, the Strategy rightly identifies the Part 2A Local Plan as the means of ensuring housing delivery is maintained through further housing allocations and that the additional housing</p>	<p>Noted. One of the purposes of the HIS is to take a longer look than five years to identify what further needs to be done through the Settlements and Countryside Local Plan.</p> <p>This is not accepted. The NPPF refers to meeting the objectively assessed housing needs of the district – it does not require it to deliver more.</p> <p>Noted.</p>	<p>No change</p> <p>No change</p> <p>No change</p>

		<p>supply levels are met through an increased level of housing at Daventry. The provision of such allocations will help to ensure housing delivery is maintained but the Authority must be aware that it is the mechanism and mix of housing sites that have in the past ensured Daventry's housing numbers have been satisfied. Any proposals to restrict such endeavours in the future will be likely to detrimentally impact upon housing delivery, which may influence the level of buffer needed.</p>		
21	Southern and Regional Developments Ltd	<p>The focus of the Strategy to deliver housing at Daventry is supported by S&R who have recently gained control of land on the periphery of the town. The recognition by the Strategy that the town does not have a high level of previously developed land for residential redevelopment is commended, focusing the strategic options for the part 2A Local Plan upon further expansion opportunities of the town. This realistic approach to requirements and potential to accommodate development is optimum when considering the evidence base and land availability work undertaken.</p> <p>Daventry Town has scope for further expansion to the south east and is able to accommodate more housing development than set out in the Core Strategy. The necessary infrastructure is able to be delivered as part of the planning process and committed to through future allocations, ensuring that sustainable growth is delivered through the town's expansion.</p>	<p>Noted</p> <p>Noted- the choice of sites is a matter for the Settlements and Countryside Local plan to address.</p>	<p>No change</p> <p>No change</p>

		<p>Expansion of the town to the south east has the scope to meet the majority of the 811 additional units that have been identified, with the potential for further expansion in the future as necessary beyond the plan period. Without a strategic allocation as envisaged to the south east of the town, the ability to deliver this scale of further housing is very questionable.</p> <p>The identification of a further area of expansion at Daventry Town would also assist in redistributing the location of housing delivery so that the focus is reset to the town, as the most sustainable settlement in the District. S&R commit to working with the Local Planning Authority to ensure that the opportunities of the land to the south east of Daventry are delivered so that the site can contribute toward the housing requirement from year 6 as intended. This timely delivery of a strategic site will help to maintain the District's track record and make up for any potential delivery delays in strategic Core Strategy sites.</p> <p>A submission will follow these representations shortly confirming the land interests secured by S&R and their intention to promote this area as a South Eastern expansion to Daventry. As set out above, there is the ability for such an expansion to accommodate the majority of the 811 dwelling additional housing requirement for Daventry and S&R would like to work with the Local Planning Authority to ensure such a proposal is delivered in a timely fashion. Please do not hesitate to contact me on the details below for further clarification on the matters</p>		
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		referenced.		
Page 10 - Neighbourhood Development Planning				
16	Hallam Land Management	<p>The 'Neighbourhood Development Planning' section of the document identifies the potential future supply from sites allocated in neighbourhood plans. In respect of the potential supply from the Moulton Neighbourhood Development Plan, there is no reference to proposed development at land south of Boughton Road in Moulton. This site was allocated in the Draft Moulton Neighbourhood Plan within Policy H6, and the appointed Examiner approved that policy. The Parish Council made the decision to allocate the land south of Boughton Road, and there is considerable local support for it because of the benefits that it will bring to the local community including a solution to access and parking problems within the village.</p> <p>We request that land south of Boughton Road in Moulton is identified within the future housing land supply, for approximately 125 dwellings as modified by the Examiner.</p>	<p>Noted – this matter was not resolved at the time that the 2016 HLA report was prepared i.e. 1st April 2016.</p> <p>Council will consider this matter at its meeting on 6th October 2016, and if it resolves to support the allocation, this will be noted in the 3rd quarter monitoring report, and then included in the HLA 2017 report.</p>	<p>No change</p> <p>No change</p>
Page 13 - Section 4 - Prospects for Maintaining the Housing Supply in Future:				
3	Althorp Estate	It is clear in the text and in the consultation draft		

		<p>of the Part 2 Local Plan that further allocations are due to be made in 'Daventry Town'-this is now stated as 811 units.</p> <p>It is unclear if this includes land within or outside the present town boundary- please can we have transparency on this figure and where the 'draft' allocation is to be sited.</p> <p>As we have noted above and in previous consultations, the large development allocations in Daventry Town means that the local town housing market is controlled by a small number of large developers-who effectively have control of the local market and the timing of any development. This is tantamount to a monopoly and needs addressing.</p> <p>There is a real need to provide smaller housing sites to cater for the small and medium sized builders and this issue needs to be addressed.</p>	<p>The additional requirement is for Daventry town, and whilst there is some capacity for development within the town, the majority of additional provision will need to be on sites adjacent to it – further information on this was provided in the Settlements and Countryside Issues and Options Report (January 2016).</p> <p>Comments regarding the scale of sites are noted, and the Settlements and Countryside Plan will need to explore what measures can be taken in this regard.</p>	<p>No change</p> <p>Matter to be considered as part of the Settlements and Countryside Local Plan.</p>
7	Harlestone Parish Council	<p>HPC note the “assumption” made regarding delivery of housing allocations at Moulton and West Haddon along with the allocation of the 811 units in Daventry which it is implied will maintain the Council’s 5-year land supply –</p>	<p>As noted elsewhere, monitoring is, and will continue to be, undertaken. The HIS includes an action plan which seeks to ensure that delivery is as close to expectations as possible. The Core</p>	<p>No change</p>

		again it is important to maintain close monitoring of these sites/allocations if there is to be such a significant reliance upon them. Do the Council have a Plan B in the event that delivery does not match expectation?	Strategy contains mechanisms to address any significant departure from expectations.	
15	Weedon Parish Council	<p>We note that the estimates for house building go only as far as 2024 which falls short of the JCS planning period to 2029. Also that most of the housing offered seems to fall towards the end of the 2011- 24 period and relies on proposals yet to be included in the emerging Settlements & Countryside Local Plan which will not be made until towards the end of 2018.</p> <p>Developers are unlikely to suddenly change and choose to build in towns rather than villages without some incentive which suggests that your projections are not robust and the target 5 year land supply may not be achievable.</p>	<p>In order to calculate the 5 year requirement account has to be taken of the housing requirement for each of the next five years. There isn't an agreed housing requirement beyond 2029 therefore the last year that a five year requirement can be calculated for is 2024.</p> <p>Comments noted regarding the Local Plan. It is appropriate to make an allowance for allocations to be made in the plan.</p> <p>The issue is about the rate of development rather than whether any has taken place at all. In recent years development has been undertaken at Middlemore, and more is on the way, development is currently underway at Monksmoor, and a start is soon expected at the college site on Badby Road west.</p>	<p>No change</p> <p>No change</p> <p>No change</p>

18	Ms D Litchfield and Mr and Mrs C Banyard Smith	For the reasons identified above, it is considered that the Council should not assume that a 5 year housing land supply will be comfortably maintained towards the mid/latter stages of the plan period. The Council should have a robust contingency strategy in place that bolsters its 5 year housing land supply. The Local Plan Part 2A should allocate a proportion of additional growth within the rural areas to further bolster supply during the plan period and in order to ensure that housing growth in villages is not too tightly constrained to the detriment to the aims and objectives of the WNJCS which aim to 'help meet local housing need and to help sustain services and facilities' in rural settlements (set out in more detail below).	The HIS sets out what is required to maintain the five year supply through the plan period and includes an action plan to ensure all necessary actions to secure the supply are identified.	No change
19	Barwood Homes	For the reasons identified above, it is considered that the Council should not assume that a 5 year housing land supply will be comfortably maintained towards the mid/latter stages of the plan period. The Council should have a robust contingency strategy in place that bolsters its 5 year housing land supply. As stated in previous representations made by Marrons Planning on behalf of Barwood Homes, the Local Plan Part 2A should allocate a proportion of additional growth within the rural areas to further bolster supply during the plan period and in order to	See response to 18 above	

		ensure that housing growth in villages is not too tightly constrained to the detriment to the aims and objectives of the WNJCS which aim to 'help meet local housing need and to help sustain services and facilities' in rural settlements (set out in more detail below).		
Page 15 - Section 5 - - Meeting the Spatial Strategy of the Core Strategy:				
3	Althorp Estate	<p>The simple reason why the development post 2011 was concentrated in the rural areas was because of the absence of an up to date district-wide local plan and the slow pace of development at Daventry Town.</p> <p>The rural growth was appeal led and not often in the most sustainable development locations.</p> <p>The lack of an up to date rural area plan or an all-embracing comprehensive Local Plan was a fundamental issue and remains so.</p> <p>We have always argued that significant and major continuing development at Daventry Town might be an issue with the majority rural area population of the district somewhat ignored- despite the large appeal windfalls in parts of the rural area.</p> <p>At the risk of repeating ourselves Table 3 (page 16) shows 811 units for Daventry Town as being</p>	<p>This has partly been addressed by the adoption of the Core Strategy, allocating a site for 4,000 units at Daventry town, and will be further addressed by the Part 2 plans.</p> <p>.</p> <p>The rural population has not been ignored. There are saved local plan polices which guide development currently and several villages have or are in the process of developing neighbourhood plans. The Council is also producing a Settlements and Countryside local plan which will provide polices for the rural areas.</p> <p>See response to Part 2A local plan above</p>	<p>No change</p> <p>No change</p> <p>No change</p>

		a further 'allocation', yet no detail is supplied of the 811 unit site or location. We as consultees / respondents to this process need clarity on this apparent "further allocation".		
4	Brixworth Parish Council	<p>In section 5 of the Housing Implementation Strategy the following paragraph states: <i>It is important to observe that a significant proportion of the sites in Daventry town are less well advanced in the planning system than those in the rural areas. The rural schemes are more straightforward to develop as they are less dependent on infrastructure than those in Daventry town. Given this, the action plan focuses most heavily on Daventry town.</i></p> <p>The Steering Group supports the focus on Daventry town but comment on the fact that it is not true for rural areas to be "less dependent on infrastructure" as our Primary school despite expanding will still be at or beyond capacity. Or to say it another way, if infrastructure issues are recognised as important in Daventry town, why not in the rural areas.</p>	<p>The intention of the text was to refer to the scale of infrastructure required in the town, (e.g. growth in Daventry requires the Daventry Development Link Road) rather than infrastructure per se. Infrastructure is recognised as being important for development wherever it may be in the district.</p> <p>It is accepted that this wording could be improved to make this clearer.</p>	<p>Amend text as follows</p> <p><i>'The rural schemes are more straightforward to develop as they are less dependent on usually require less major infrastructure than those in Daventry Town'.</i></p>
5	Braunston Parish Council	"Table 3 – Urban/Rural Split This table refers to the "Further allocations identified for Daventry Town in S and C LP" This plan proposed options for extending the town by developing to the North West, South West and South East. However as this plan is not yet adopted how can these 811 allocations be already included this strategy ?"	The HIS does not identify allocations, the table referred to is setting out the level of allocations that the Settlements and Countryside Local Plan will need to make provision for.	No change

7	Harlestone Parish Council	<p>HPC have concerns that the assumptions made regarding the delivery of housing in the district, and in particular the split between rural and urban supply will in reality not be delivered. Although the Core Strategy states that 66% of new housing should be provided in urban areas (with 34% in rural areas) the reality is that only 43% of new housing thus far has been delivered in the urban area. It is evident that this delivery scenario has not therefore been delivered.</p> <p>The commentary identifies a number of reasons for this, including a number of “practical” reasons as to why this is the case. Although the document “aspires” to increase the proportion in line with the desired Core Strategy objective it offers little in the way of “incentivising” developers to deliver in the urban area as opposed to the more straightforward and more attractive rural areas.</p> <p>It is crucial that the monitoring of the delivery of these sites is undertaken robustly. HPC have concerns that any reduction in supply which would reduce the 5-year land supply provision could lead to increased pressure from developers on for the development of sites that are clearly less appropriate for development than those identified through the planning process, especially sites within or adjacent to</p>	<p>Noted, this concern is already identified in the HIS and the Action plan has been devised seeking to address this.</p> <p>The Action plan seeks to address this.</p> <p>Agreed, as noted in the HIS and the HLA 2016 Report ongoing monitoring of sites is undertaken to identify any changes in the delivery of sites.</p>	<p>No change</p> <p>No change</p>
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		<p>the rural villages and settlements in the district where there is demonstrably a greater demand for delivery.</p>		
15	Weedon Bec Parish Council	<p>We note that the split in housing development achieved to date is 30/60 in favour of rural housing as against the JCS expectation which is almost exactly opposite. The document explains this by suggesting that developers prefer to avoid the heavy infrastructure costs involved when building in the town. This would seem to lead to the conclusion that the planned Sustainable Urban Extension(s) are less than sustainable because infrastructure costs are so high as to deter developers. We fear that new housing development in the town will be left with inadequate local services such as schools and GP services leading to more pressure on those services in the rural areas.</p> <p>If the present 60/30 rural/urban ratio continues we fear that villages will remain an attractive target for speculative developers despite best efforts through Neighbourhood Plan to protect village environment and infrastructure.</p> <p>Higher value developments in rural areas already pay more CIL and council tax thus seemingly disproportionately subsidising infrastructure development in Daventry town which rural residents probably make less use of. The reality seems to be that developers prefer rural sites.</p>	<p>The infrastructure costs for large development are high, but this has not deterred developers, they are currently working towards a planning application. The lead in times for such schemes are lengthy because of their complex nature, but once they have 'got off the ground' they will contribute towards the supply for many years to come.</p> <p>The 60/30 split represents what has happened in reality and not a policy intention. The HIS seeks to address this by the inclusion of several actions for Daventry town.</p> <p>The level of CIL is determined by the viability of development and thus the rate for rural areas is higher because higher sales values can be achieved. CIL will contribute to infrastructure which benefits residents in more than just Daventry town, an example being the Daventry Development Link (DDL) which will benefit residents of Flore and Weedon by taking</p>	

		<p><i>Please would you explain what measures the District Council is going to put in place to attract development to the urban area particularly now that housing numbers for the town have been increased by 300 as mentioned in our first paragraph?</i></p> <p>In addition to the issues raised above, over reliance on the less predictable sources of development in section B, failure to acknowledge within the document the general slowing down of house building and the economy (which is now likely to be exacerbated by Brexit) lead this Parish Council to feel less than confident of the District Council's ability to sustain a 5 year land supply to 2024, let alone to 2029.</p>	<p>traffic out of those villages.</p> <p>As noted above, the Action plan sets out a number of Actions for Daventry town. The Council has also worked pro-actively with the County Council to enable the construction of the DDL which will facilitate development in Daventry town.</p> <p>The Council accepts that there is no certainty about what will happen in terms of housebuilding levels over the next few years. The Council has made a number of assumptions which it feels are robust, but accepts they are just assumptions. Ongoing monitoring will reveal if this turns out to be close to what actually happens, if there is a material divergence then the HIS will need to be reviewed.</p>	
18	Ms D Litchfield and Mr and Mrs C Banyard Smith	The action plan identified by Daventry District Council is focussed on directing additional supply towards the urban area of Daventry. Whilst this is acknowledged to accord with the general strategic approach adopted by the Core Strategy, there are a number of rural villages that have seen limited growth over recent years;	The overall balance is a matter for the Settlements and Countryside plan to address.	No change.

		<p>this point is highlighted at paragraph 6.3 of the emerging Local Plan Part 2A: <i>'Whilst the rural requirement has been met this has been largely focused on a number of larger settlements and that some smaller settlements may benefit from some development to help meet local housing need and to help sustain services and facilities. Consequently it is important for the plan to explore the issue of where any further development should take place in the rural areas.'</i></p> <p>It is considered that contrary to the comments made in Section 5 of the Housing Implementation Strategy, additional housing growth within the rural areas should not be seen as being in conflict with the wider spatial strategy adopted as part of the WNJCS; indeed the vision, aims and objectives of the WNJCS seek to create 'vibrant rural communities' and to allow housing 'in the rural areas to provide for local needs and support local services.' An overly restrictive approach to housing in the rural areas could constrain housing growth in some villages to the detriment to these aims and objectives.</p>		
19	Barwood Homes	<p>The action plan identified by Daventry District Council is focussed on directing additional supply towards the urban area of Daventry. Whilst this is acknowledged to accord with the general strategic approach adopted by the Core Strategy, there are a number of rural villages that have seen limited growth over recent years; this point is highlighted at paragraph 6.3 of the</p>	See response to 18 above	

		<p>emerging Local Plan Part 2A: <i>'Whilst the rural requirement has been met this has been largely focused on a number of larger settlements and that some smaller settlements may benefit from some development to help meet local housing need and to help sustain services and facilities. Consequently it is important for the plan to explore the issue of where any further development should take place in the rural areas.'</i></p> <p>It is considered that contrary to the comments made in Section 5 of the Housing Implementation Strategy, additional housing growth within the rural areas should not be seen as being in conflict with the wider spatial strategy adopted as part of the WNJCS; indeed the vision, aims and objectives of the WNJCS seek to create 'vibrant rural communities' and to allow housing 'in the rural areas to provide for local needs and support local services.' An overly restrictive approach to housing in the rural areas could constrain housing growth in some villages to the detriment to these aims and objectives.</p>		
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Page 17 - Section 6 – Meeting the Affordable Housing Requirement

7	Harlestone Parish Council	HPC note the conclusions on the delivery of Affordable Housing. Again this appears to be based on assumptions rather than evidence. For example what is factored in to account for issues of viability – particularly if there is an increased reliance on urban, and therefore	The information takes into account all of those sites where there have been changes to the amount of affordable housing as a result of viability issues. Any other changes will be picked up through the	No change
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		<p>brownfield sites, for the delivery of new housing? What evidence do DDC have with regard to recent planning applications having their affordable housing requirements reduced following viability arguments?</p> <p>Furthermore how does the affordable housing delivery scenario factor in elements such as first time buyer properties, increased social-rental housing, carehome/retirement homes, student accommodation, Houses in Multiple Occupancy all of which are increasing tenures in the housing market.</p>	<p>ongoing monitoring – if this identifies concerns about future delivery the action plan will be revised accordingly.</p> <p>Currently the information looks at what could be termed conventional affordable housing. The council is currently looking into other forms of housing e.g. that required for the elderly and can include this in future iterations of the HIS.</p>	No change
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Page 19 – Section 7 - Meeting the Needs of Gypsies Travellers and Travelling Showpeople

4	Brixworth Parish Council	<p>With regard to section 7, Meeting the needs of Gypsies, Travellers and Travelling Showpeople; the opinion of this Steering Group was previously communicated in our Part 2b response earlier this Year. We believe that some additional pitches should be provided on Justin Park, which caters for the north east of DDC and will give relief in the immediate short term - and that other sites should be found in the west and south of the district. This will give the Travelling folk some alternatives instead of concentrating in one area.</p>	Noted,	No change. This matter will be dealt with further through the Gypsies, Travellers and Travelling Showpeople Local Plan.
7	Harlestone	<p>HPC note the conclusion that at present no 5-year supply (as required) for the appropriate number of pitches can be demonstrated. HPC</p>	Noted. The Council would undertake such consultations at an early stage in plan making.	No change

		would wish to be involved at an early stage if the council are considering allocating sites within or adjacent to the Parish.		
13	BRANE	It appears that the needs of Gypsies, Travellers & Travelling Show People are well catered for already in the north & west of the District. Surely any further provision should be in those areas near to major roads in the east & south. A policy requiring developers to include small sites on new developments produce the necessary funding but is hardly likely to find favour with either Gypsies and Travellers or more permanent residents.	Noted. These matters will be considered further as the Gypsies, Travellers and Travelling Showpeople Plan is prepared.	No change

Page 21 - Action Plan

7	Harlestone Parish Council	<p>HPC note and welcome the production of the Action Plan to address some of the issues identified above. The Council notes however that the Action Plan is based on a number of assumptions regarding delivery of both key infrastructure and overall housing sites. We acknowledge that there needs to be an element of this, however there are concerns that a number of key housing sites still await confirmation of delivery and that significant infrastructure (the Daventry Development Link for example) items are assumed to be delivered within certain time frames.</p> <p>HPC would be interested to know what monitoring of the delivery of these various "Actions" will take place and what options are in</p>	<p>Noted, it is inevitable that sites will be dependent on infrastructure, but the purpose of the HIS is to specifically identify any potential issues with infrastructure delivery that would affect housing delivery. The Daventry Development Link referred to is currently under construction.</p> <p>The Actions will be reported on a quarterly basis.</p>	<p>No change</p> <p>No change</p>
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		place to either facilitate these (funding, facilitating, land assembly, additional resources, planning-orders) in the event that it would appear certain timescales/assumptions are likely to be met.		
Page 22 - 3. Daventry Central Area				
3	Althorp Estate	<p>The 5 year housing land supply document allocates 50 dwellings to this site in the expectation that the site will come forward in the cycle of the current housing land supply document. We question any housing delivery from this site within the remaining time frame of the 5 year supply.</p> <p>This site (site 3) is inextricably bound up with the longer term provision of the North East SUE (note below) the provision of a canal basin and the long link to the Grand Union Canal to the north of the town. Some clarity on this would be useful in the Action Plan.</p>	<p>Noted, an action is already included to demonstrate whether or not this will be the case.</p> <p>This is already covered by the required action</p>	<p>No change</p> <p>No change</p>
Page 23 - 4. Daventry North East Sustainable Urban Extension (SUE):				
3	Althorp Estate	<p>The information regarding this site in the 2016 HLA Report is out of date as we all understand the previous developers are no longer pursuing an interest in the site.</p> <p>Therefore complete transparency is needed on</p>	<p>The information is not out of date. The HLA 2016 report states that the previous developer is no longer involved in the site, and that a new developer is now taking up the option.</p> <p>The HLA report sets out the</p>	<p>No change</p> <p>No change to HIS. The</p>

		<p>the 'continued emergence' of this important site. This report should state the named developer(s), the likely timing of any Masterplan, planning applications and the reasons for and assumptions behind the development timing. We note that this report shows the agreed timeline which has already been missed and therefore further slippage as to this site is obviously likely.</p> <p>We are of the view that it must be questionable that there will be any housing development from this site within the remaining 5 year period.</p> <p>We make these comments as it was clear at the examination into the JCS that the inspector appeared to be misled or misunderstood the agent on a range of matters regarding this site including the actual agreed site availability, site options and the intentions of the developers.</p> <p>It would be more than unfortunate for emergent policy now not to address this issue 'head-on' after all that is the intention behind this implementation strategy. There needs to be full clarity on the strategy for this large site as it is one of the key sites for the provision of housing for the district.</p>	<p>anticipated timescale for an application on pages 36/7. It is noted that this has slipped and that this will have an impact on delivery. A revised programme will be included in the 2017 HLA report. The Council is providing advice to the developer to assist in the preparation of an application for submission as soon as possible.</p> <p>It is accepted that the timeline for an application has been missed, and that a revised position will need to be included in the HLA 2017 Report. The fact that there is slippage on this site is recorded in the 1st quarter monitoring report which is on the Council's website. Whilst it is accepted that most probably less development will come forward in the next five years than anticipated in the HLA 2016 report, there is no evidence that no development at all will occur. The importance of this site is fully recognised by the Council, and it has committed resources to advising the developer in preparing their planning application. The Council is also very much aware of the consequences of slippages on this site, and is</p>	<p>HLA 2017 Report will reflect slippage in the programme for submission of an application.</p> <p>No change to HIS. The slippage in delivery on this site will be a matter for the Settlements and Countryside plan and HLA 2017 Report to address.</p>
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			keeping this under review. Any envisaged shortfall in provision will be addressed by the part 2 plan.	
Page 24 - 8. Sites of 15 Units or more:				
3	Althorp Estate	We completely agree with this approach.	Comments welcomed	No change
3	Althorp Estate	<p>The Governments housing land supply requirement is quite simple; authorities need to demonstrate a 5 year supply of deliverable housing sites.</p> <p>It is clear to us that there are deliverability issues on some sites (as noted) under section C of Table 3 of the 2016 Housing Land Supply Statement and this is likely to be an issue also on some of the approved sites and those now being developed-hence our real concern regarding a need for up to date monitoring and complete transparency on delivery.</p> <p>The question we ask regarding the sites in Section C of Table 3 is, are all of those sites deliverable now?</p> <p>Looking at this matter completely objectively we feel that both Site 3 (Daventry Central Area) and the Daventry North East SUE are not demonstrably available and should be deleted from the 2015 5 year housing supply table.</p>	<p>The Council is undertaking monitoring, and is completely transparent; the HLA reports are all published on its website and have over recent years been tested on several occasions at public inquiries. The Council has responded to the various comments made by inspectors at those inquiries.</p> <p>As noted above the sites within the supply have all been tested at appeals,</p> <p>The Council consider that these sites should be included for the reasons set out in the HLA 2016 Report, and because they have been tested at appeal.</p>	<p>No change</p> <p>No change</p> <p>No change</p>

		<p>Therefore we think these allocations should be deleted from the 2016-21- Housing Land Supply Table and / or further clarity given on deliverability as clearly at least these two sites are not demonstrated as being available now for development and capable of being developed.</p> <p>We can only give the district a 5.5 year supply and clearly in any case we question future windfall and the fact that Daventry Town completions we believe will be slower than anticipated which is a real concern.</p>	<p>For the reasons stated above this is not accepted</p> <p>Whilst the Council would disagree that the supply is only 5.5 years, it is noted that the respondent agrees that the Council can demonstrate at least a five year supply.</p>	<p>No change</p> <p>No change</p>
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