Settlements and Countryside Local Plan (Part 2) for Daventry District

Site Selection Background Paper Version 4 (GEN05)

December 2018
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1. Introduction - Purpose of Document

1.1 The purpose of this document is to explain the process and clearly illustrate the reasons why sites have been selected to be allocated for residential and employment land uses in the Settlements and Countryside Local Plan (Part 2) for Daventry District. This document also sets out the reasons for why alternative sites have not been selected for allocation for residential and employment land uses.

1.2 In doing so it summarises key pieces of evidence that have been used to inform the basis of the Council’s decision making.

1.3 This paper should be read alongside the Housing and Employment Background Papers which provide further context to the overall need and demand in Daventry town which the sites are seeking to meet. This is as follows;

- Residential for Daventry town – 1266 dwellings
- Employment land (units less than 10,000 sqm) – 13 ha
2 Structure of this Document

2.1 The structure of this document is set out as follows. Section 3 of this report sets out the national and local planning context, this includes setting out the relevant policy approach in the National Planning Policy Framework (NPPF), the West Northamptonshire Joint Core Strategy as well as the saved policies from the District’s Local Plan (1997). Section 4 sets out the outcome of consultation on the Issues and Options in 2016, and the Emerging Local Plan (December 2017 – January 2018).

2.2 Section 5 of this report provides a summary of the relevant evidence bases that have informed the selection of sites. These include:

- Daventry Housing and Economic Land Availability Assessment (HELAA)
- Sustainability Appraisal
- OPUN Reports (A design review body)
- West Northamptonshire Strategic Flood Risk Assessment (SFRA)
- Water and Waste-water Infrastructure Capacity Assessment
- Landscape

2.3 Section 6 explains the process of site selection. This sets out the 5 stages of the process of site selection and that the sites progress through. Appendix 1 of the report sets out the full assessment of each site that has progressed to a stage where they were considered potential sites for allocation in the Plan. This also includes an update from the Heritage Impact Assessment work published in June 2018 and the Strategic Transport Assessment published in August 2018. These documents still form an important part of the evidence base but were commissioned and completed after the emerging draft consultation and informed whether sites should remain as allocations or not.
3. National and Local Policy Context

**National Planning Policy Framework (NPPF) – March 2012**

3.1 NPPF requires local plans to allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.\(^1\) This applies to both residential and employment land uses.

3.2 As required by the NPPF the Council must use the evidence base to meet the full objectively assessed needs (OAN) for the market and affordable housing in the housing market area, which includes identifying key sites which are critical to the housing strategy over the plan period.\(^2\)

3.3 The Council is also required to identify and update annually a supply of deliverable sites sufficient to provide five years’ worth of housing against their housing requirements. Deliverability is defined as sites, which are available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years and that the site is viable\(^3\). For a site to be considered developable sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.\(^4\)

3.4 As detailed in the NPPF the housing and economic land availability assessment as prepared by the Council establishes the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period.\(^5\)

**West Northamptonshire Joint Core Strategy (December 2014)**

3.5 Policy S1 of the WNJCS sets out the distribution of development across the West Northamptonshire area. Whilst development will be primarily located within the principal urban area of Northampton, development of a lesser scale will be located in and adjoining the sub-regional centre of Daventry Town.

3.6 The objectively assessed housing need for West Northamptonshire has been determined at 41,760 2011 – 2029. Policy S3 sets out the scale and distribution of

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\(^1\) NPPF Para 157  
\(^2\) NPPF Para 47  
\(^3\) NPPF Para 47 footnote 11  
\(^4\) NPPF Para 47 footnote 12  
\(^5\) NPPF 159
housing development within the District over the plan period. The requirement for Daventry town is set at about 4,620 dwellings and within the Rural Areas about 2,360 dwellings.

3.7 Policy S5 identifies a Sustainable Urban Extension (SUE) at Daventry and local employment opportunities.

3.8 Policy S8 sets out the distribution of where employment opportunities in Daventry will be broadened by provision of renewal and regeneration of existing employment sites, office and leisure development in the central area and supporting the growth of DIRFT and local employment provision within Daventry North East SUE.

Saved Policies of the Daventry District Local Plan Policy (Saved - September 2007)

3.9 The policy approach set out in Policy HS4 is to direct residential development to allocated land in the northern area of Daventry at Ashby Fields, Lang Farm and once these are completed development at Middlemore. Policy HS6 also directs residential development to the existing built up areas of Daventry. In addition Policy HS11 allows some residential development in the rural area in the identified Limited Development Villages on identified sites or for small scale development. Policy HS22 also allows small scale residential development in Restricted Infill Villages, within their existing confines. Policy HS24 resists residential development in the open countryside.
4. Consultation on earlier versions of the Part 2 Local Plan

Issues and Options Consultation (January 2016)

4.1 The Issues and Options consultation identified the residual requirement for residential development for Daventry town. Issue 13 of the consultation sought to establish the appropriate approach for further housing development at Daventry both in terms of meeting identified needs and to help to continue to reinforce Daventry as the focus for further growth. To inform further allocations at Daventry town, it is necessary to establish the appropriate spatial approach to help inform the distribution of housing. Options identified included expansion of Daventry to the southeast, to the north, to the south / southwest or to consolidate on existing sites and within the town. From this consultation there was a mixed response as to the most appropriate and sustainable option, with all options evenly supported by respondents.

Emerging Draft Plan Consultation (December 2017 - January 2018)

4.2 The representations to the emerging draft are set out in full here⁶ and the summary of representations, responses and actions can be viewed here⁷. The representations to sites that relate specifically to policy wording, are not set out in this document. However responses to the general approach to site selection, and specific sites promoted, have been set out below.

4.3 Two sites to the north of Daventry were promoted as alternative sites. These are sites that had previously been assessed as sites 321 (including 119) and 303.

4.4 The promoters of site 321 (Middlemore Farm), consider the site can deliver more homes than indicated in the OPUN report (circa 285 dwellings) and the site can be sympathetically designed to mitigate the impact on the Canal conservation area and landscape more generally. They also set out that allocation of this site would avoid development within the existing designated Special Landscape Area and provides the potential for delivery of an improved strategic road network with potential for

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delivery of a link road between the A361 and A45. The promoters of site 321 also promoted a further site for employment North of Apex Park.

4.5 Site 303 to the North of the town was also separately promoted as part of an allocation alongside site 134, pointing out that the OPUN workshop did not consider the extension to Micklewell park as part of the assessment.

4.6 Some further representations questioning the selection of Daventry South West as the preferred site were also received, most notably from Daventry town council preferring the identification of smaller sites to the north and north east of the town.

4.7 Furthermore Daventry South East (312) was promoted as a further allocation alongside those sites already proposed for allocation.

4.8 It is not considered that any of these sites promoted should be included in the plan or that they affect the site selection process undertaken, which justifies the approach in the Proposed Submission plan.

4.9 A further site was submitted, Welton Place farm (identified as part of site 301). This was proposed as a further extension to Micklewell Park. This site has been taken forward in the plan, as explained in paragraph 5.20.

4.10 Sites in the rural areas were also promoted for residential purposes but are not considered appropriate to be taken forward as the rural requirement established in the WNJCS has been met and further allocations would be contrary to the overarching spatial strategy.

4.11 Sites in Crick and Brixworth, were promoted for employment purposes with some sites at Crick on the basis that they would help meet the demand for small to medium sized units to support operations at DIRFT and accommodate supply chain businesses. The 2017 Employment Study\(^8\) identified that demand for such units is likely to increase in the future at DIRFT as the next phase of DIRFT is built out and occupied. The site at Brixworth was promoted on the basis that sites should be provided where there is market demand, rather than in accordance with the spatial strategy set out in the WNJCS.

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\(^8\) Employment Land in Daventry District The Demand for Small and Medium Units October 2017 available from; https://www.daventrydc.gov.uk/living/planning-policy/part-2-local-plans/evidence-base/
4.12 It is not considered necessary to assess the sites identified above at Crick and Brixworth to potentially be allocated because they would be contrary to the overall spatial strategy and they are not justified against the demand identified in the 2017 employment study. In respect of Crick the study was clear that such demand would be for supply-chain related occupiers as phase 3 of DIRFT is built out and occupied. As at July 2018 48,310sqm of floorspace has been completed with 626,520sqm remaining to be built out, including the rail freight terminal and lorry parking facility.

9 DIRFT Phase 3 Masterplan available from; http://dirft.com/new-customers/masterplan/
5. Relevant Evidence Base Documents

5.1 The following documents/studies are the key pieces of evidence that have informed the selection of sites in the Part 2 Local Plan and contributed to the stages set out in section 6. They are summarised below.

Daventry Housing and Economic Land Availability Assessment (HELAA) - November 2017

5.2 The Daventry HELAA\(^\text{10}\) is an assessment of land availability to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The HELAA identifies specific deliverable sites for the first five years of the plan period and specific developable sites and broad locations for the remainder of the plan period. As part of this process a ‘Call for Sites’ exercise was undertaken as part of the Settlements and Countryside Local Plan (Part 2) Issues and Options consultation in January 2016 and again in Autumn 2016 as part of consultation on the HELAA methodology. The HELAA is published as a separate document on the Council’s website.

Sustainability Appraisal (SA)

5.3 The Council under, section 19 of the Planning and Compulsory Purchase Act 2004 is required to carry out a sustainability appraisal (SA) of each part of its plan. The sustainability appraisal tests the effects of the plan on environmental, social and economic objectives. The outcome of the appraisal is an SA report which sets out the results of the SA process, reports on the potential effects of the draft Local Plan and outlines a programme for monitoring the effects of the plan. The SA also considers reasonable alternatives to the plan and assesses both proposed allocations and reasonable alternatives. The SA is split into 5 parts (Non-technical summary, Part 1: Introduction and Methodology, Part 2: Scoping Information, Part 3A: Assessment of Alternatives and Part 3B: Assessment, Preferred Options) and is available on the Council’s website\(^\text{11}\).

5.4 The starting point of the assessment is a review of the baseline environmental, social and economic conditions of the area and the objectives the plan should be helping to achieve. The assessment involves the comparison of the local plan against the 14 objectives of the SA framework. These are as follows:

\(^{10}\) Daventry Housing and Employment Land Availability Assessment available from; https://www.daventrydc.gov.uk/living/planning-policy/part-2-local-plans/evidence-base/

1. Air quality and noise
2. Archaeology and cultural heritage
3. Biodiversity, flora and fauna
4. Crime and community safety
5. Education and training
6. Energy and climatic factors
7. Health and well being
8. Labour market and economy
9. Landscape and townscape
10. Material assets
11. Population and social deprivation
12. Soil, geology and land use
13. Waste
14. Water

5.5 Once an effect has been identified this is scored according to how significant the effect could be. This ranges from significant positive effect, minor positive effect, neutral effect to minor negative effect and significant negative effect. An uncertain effect can also be recorded, where it is unclear whether there is a potential for a negative or positive effect in the SA objective. The findings of the assessment of the individual site assessments can be found in Appendix 1 of the SA Report Part 3A.

5.6 The SA also includes an assessment of the reasons for selecting alternatives for town centre sites, housing and employment sites and outlines the reason for selecting the preferred approach.

**Strategic Growth in Daventry, OPUN Review**

5.7 OPUN, a design review body based in the East Midlands, was appointed to provide support and advice on potential residential allocations. As part of this process three structured workshops were held covering three sites at the edge of Daventry. These sites had emerged through the call for sites and been identified as potential sites through initial site appraisal undertaken in the HELAA. More information about how the sites were examined through this process is set out in section 6.

5.8 The workshops assessed the following three sites;

- Daventry South East (312)
- Daventry North (321)
• Daventry South West (322) Please note this site is SA site 202 which also includes HELAA site 90

5.9 The purposes of the workshops were as follows:

• To identify key constraints and opportunities that inform the suitability of the site
• To agree a set of design principles for the site in an illustrative form, and
• To produce a proving layout to indicate the potential housing numbers that could be accommodated on the site

5.10 The workshops involved a number of stakeholders summarised as follows;

• Daventry District Council – Planning Policy, Landscape, Development Control, Conservation and Environmental Health
• Land Promoters and planning consultants with relevant areas of expertise
• Landscape (The Environment Partnership who had been commissioned by the District Council to assess landscape across the District including assessment of the landscape capacity of each site)
• NCC Highways and NCC Infrastructure
• Historic England and NCC Archaeology (Daventry South East only)

5.11 Each workshop featured a site visit (the site itself and views from various vantage points around the site, agreed by all workshop members) and was structured around some recurring key themes;

• Site and wider context – including site assets and constraints
• Connectivity and movement
• Infrastructure
• Blue and Green Infrastructure

5.12 The outcomes of the workshops have been collated and set out in a report\(^\text{12}\). The summaries for each of the sites assessed are set out in this background paper.

In May 2017 the West Northamptonshire Joint Planning Unit commissioned Northamptonshire County Council (NCC) to prepare an updated Level 1 SFRA\(^{13}\) to satisfy the requirements of the NPPF. An SFRA is required to assess the risk to an area from flooding from all sources, taking into account the impacts of climate change and to assess the impact that land use changes and development in the area will have on flood risk. Future development needs to be planned carefully to steer it away from areas that are most at risk from flooding and ensuring that it does not increase flooding elsewhere. The Council have to review the variation in flood risk across the District and steer vulnerable development such as housing towards areas of lowest flood risk. Where this cannot be achieved and development is permitted in areas that may be subject to flood risk, it will need to be demonstrated that there are sustainable mitigation solutions available that will ensure risk to property and life are minimised.

Level 1 SFRA update considered all sources of flood risk including pluvial, fluvial, groundwater and reservoir. Historically the dominant source of flood risk in West Northamptonshire has been from fluvial flooding. Flood risk zones have been mapped including high probability areas and the functional flood zone. The risk of groundwater has been deemed low in the past, however recent detailed assessment has identified areas that are at high risk of groundwater flooding, these areas are found in the locality of Brixworth and Moulton within the District.

Potential development sites within the District have been individually assessed through the sequential testing process. This review has included site specific assessment of the fluvial, surface water, severe flooding, groundwater and reservoir breach flood risk.

This process highlighted 3 sites that require more detailed assessment prior to allocation due to the flood risk posed. These are Daventry Town Centre sites 3 and 5, Daventry South East and North of Middlemore. The study is available on the Councils website.

Water and Waste-water Infrastructure Capacity Assessment

5.17 This assessment\(^{14}\) provides evidence of the impact of development proposed on water and waste-water capacity. The impact of development on water quality remains a significant issue for the area and an integrated approach to water management with the planning and design, to ensure that new development meets the needs of sustainable growth, seeks to reduce the impacts on water quality and removes or mitigates risk.

Sites are scored using a Red, Amber, Green (RAG) rating as follows;

- **Red** - Major Constraints to Provision of infrastructure and/or treatment to serve proposed growth

- **Amber** - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required

- **Green** - Capacity available to serve the proposed growth

Landscape

5.18 As part of the Landscape Study\(^{15}\) each potential allocation was subject to an initial landscape assessment to help establish where potential site allocations might best be accommodated in the landscape setting of Daventry to safeguard the defined special qualities from harm and to mitigate potential adverse effects. The landscape and visual quality of the potential site allocations was also considered. Each site assessment considered the following:

a) landscape character area site is located in, how intact is this?

b) Consistency of landscape character – how consistent is the actual site with its surroundings?

c) remoteness and tranquillity – how has the landscape been influenced by man, how is it perceived, looked at noise from roads, employment and residential development

d) visual quality – views, urban influences


e) visual prominence of site – how connected is the site with its surroundings?

f) nature of urban edge – is it soft or hard

g) settlement setting and views of settlement –

h) public accessibility within site

j) conclusion on development capacity and scope for mitigation

5.19 The site summaries in appendix A only set out the conclusion on development capacity and scope for mitigation.
6. Site Selection Process

Scope of this section

6.1 It should be noted that, as set out in 2017 HLA report the rural housing requirement for the rural areas has already been exceeded and therefore it is not proposed to make any further allocations. Also as noted in employment and economy background paper there is no need to make further allocations for employment use in the rural areas.

6.2 This section of the Paper therefore focuses solely on Daventry town in respect of sites for residential and employment use.

Source of sites

6.3 The principal source of sites was from the call for sites exercises referred to above. In order to ensure that there was complete coverage of the ‘ring’ around Daventry wherever gaps occurred between the call for sites, further sites were included based on the parcels of land assessed through the SA for the WNJCS.

6.4 In addition to this, other sites within the urban footprint of Daventry were assessed. Where these are proposed for allocation they are included in this paper. Other, generally smaller sites may also come forward for planning as ‘windfall sites’. These will be dealt with under relevant planning policies however it is not considered necessary to provide further details of them in this paper.

Process

6.5 The sites set out in this selection paper relate to those identified in the 2017 HELAA that have potential to meet the housing or employment needs of Daventry town. As part of the HELAA assessment, each site was assessed according to its suitability, availability, and achievability. For residential the HELAA assessed 249 sites in total of which 53 were identified for Daventry town. For employment 23 sites were assessed of which 14 were identified for Daventry town.

6.6 As part of the site selection process and to reflect that certain sites are more constrained and less likely to have the potential to be allocated, a staged assessment process has been undertaken with some sites only progressing to certain stages. The process is set out below and each site is then discussed in this section and, where applicable, appendix A. For consistency with the Sustainability Appraisal undertaken
for the WNJCS all sites at the edge of Daventry town were subject to Sustainability Appraisal and assessed through the HELAA.

6.7 As set out in the background paper, there are a number of sites committed at Daventry town for residential and employment. These have been factored into the supply and have not been dealt with further in this paper.

**Stages of Site Selection**

6.8 The stages of the process are set out in the following flow diagram (Figure 1) and explained in detail in the following paragraphs. Throughout each stage in the process the Sustainability Appraisal has played a key role in informing the decision making process, with sites either assessed as reasonable alternatives or assessed as potential allocations. The stages below also briefly touch on the main sites considered for inclusion in the plan, which is also set out in detail in appendix A.
Figure 1 – Site Selection Flow Diagram

Stage 1 – Sites subject to constraint identified in HELAA methodology (Stage 1 of HELAA - SSSI, LNR, Historic Parks and gardens, Floodzone 3a or 3b, Ancient Woodland or Scheduled Monuments) are assessed in the SA as alternatives only, and do not proceed further. Otherwise sites proceed to Stage 2

Stage 2 – Sites assessed to establish if they are Deliverable and Developable as identified in the HELAA methodology. Sites identified as not deliverable or developable in the plan period are assessed in the SA as alternatives only, and do not proceed further. Otherwise sites proceed to stage 3

Stage 3 – Technical Site Assessment. All sites that proceed to this stage have technical assessment e.g. SFRA. This also informs identification of criteria for inclusion in policy wording and could affect choice of sites

If sites need further assessment beyond technical work they proceed to the OPUN review process – Stage 3a/3b

Stage 3a (OPUN Review) Daventry South East. Not considered to be suitable for residential following OPUN review

Stage 3b (OPUN Review) Additional Sites Assessed following Historic England objection to Daventry South East – Daventry South West & Daventry North. Daventry South West proceed to Stage 4

Stage 4 – Sites proposed for allocation in Emerging Draft Plan

Stage 5 – Sites proposed for allocation following representations on emerging draft, Heritage Impact Assessment and Strategic Transport Assessment in Proposed Submission Plan
Stage 1 HELAA

6.9 Sites were assessed to identify if there were any designations which would preclude development, or if they were too highly constrained to be acceptable, given alternative sites exist. Sites were not taken beyond this stage when subject to the following designations;

- Site of Special Scientific Interest
- Local Nature Reserves
- Historic Parks and Gardens
- Functional floodplain (Flood Zone 3a or 3b)
- Ancient Woodlands
- Ancient Monuments

6.10 However for completeness, these sites were assessed as part of the Sustainability Appraisal.

Stage 2 HELAA

6.11 Sites were assessed through the HELAA for their potential to deliver housing/employment within the plan period. Those identified as not deliverable or developable within the plan period, were ruled out at this stage but were assessed as reasonable alternatives in the SA. Sites identified through the HELAA as having the potential to come forward within the plan period proceeded to stage 3.

Stage 3 – Further Planning and Technical Assessment

6.12 The sites considered suitable for allocation were subject to a further planning and technical assessment which took account of the SA and, where appropriate included landscape, flood risk and water-cycle capacity.

6.13 From the planning assessments the following sites were identified as having little if any constraint and considered sustainable such that no further work was required in terms of their selection. These are identified in the plan as HO2, HO3, EC2, EC3, EC5, EC6 and EC7.

6.14 A further site was identified as a potential urban extension to the South East, this warranted further evaluation, known as Stage 3a.
Stage 3a – OPUN Review

6.15 At stage 3 one site was identified as initially having the potential for a sustainable urban extension to provide sufficient capacity to make a significant contribution to meet the residual needs for Daventry town. This site, to the South East of Daventry, has a planning history (part of an appeal in 2009) and adjoins Scheduled Monuments. Therefore informal consultation took place with Historic England to establish their likely response to the site being allocated. Given their response to this, highlighting a formal objection (letter dated 1st February 2017 set out in Appendix B), the council set up a workshop, facilitated by OPUN, to explore in some detail the strength of that objection and whether or not there was likely to be any prospect of addressing those concerns alongside a wider assessment of the suitability of the site and its likely development capacity. It emerged at that workshop that Historic England would maintain their objection (follow up letter dated 4th May 2017 set out in Appendix B), and that the site had other design constraints largely due to the proximity to adjacent employment land and the landscape setting of Newnham Hill and Borough Hill which would severely impact on the capacity of the site, in turn affecting its ability to provide the necessary infrastructure to make it sustainable, for example on-site education. Whilst the OPUN review did not identify this site as suitable for large scale residential development it still received further technical assessment for a complete understanding of the site. It was also subject to SA as an alternative site. Following the outcome of the Stage 3a workshop, 2 further sites identified at Stage 3 were assessed at Stage 3b, as detailed below. These were not originally assessed at stage 3a because at that time it was considered there would be sufficient capacity from the Daventry South East site.

Stage 3b – OPUN Review

6.16 Daventry North and Daventry South West were both subject to the OPUN review workshop process. This, along with the further technical assessment and taking into account the SA, carried out for both sites and the Daventry South East site, enabled the Council to identify which site was the most suitable for allocation in this plan to provide a Sustainable Urban Extension to help meet the residual needs for Daventry town. Through this process the Daventry South West site was identified as the most suitable location to accommodate the level of development required. Some initial modelling in relation to Highways was carried out which confirmed that suitable vehicle and pedestrian access could be achieved to help ensure the site would be sustainable.

Stage 4 – These are the sites that were proposed to be allocated in the emerging Plan
6.17 Taking into account all the findings from the technical and planning assessments the most suitable sites for allocation were identified for inclusion in the draft plan. In addition, at that stage, the need for the inclusion of criteria within the allocation policy to ensure the proper development of the site were identified.

**Stage 5 – These are the sites included in the Proposed Submission Plan**

6.18 All of the sites were reviewed in the light of representations received during the consultation period. As detailed above, having carefully considered all of the representations, all of the proposals included in the emerging draft plan are still considered appropriate for allocation. This further consideration included a Heritage Impact assessment of some sites as detailed below. That work and the representations received enabled further clarification of policy wording to ensure the allocations would be effective and ensure that they achieved sustainable development. In two cases, additions to the allocations have been included, this is detailed further below.

**Heritage Impact Assessment**

6.19 A response from Historic England to the emerging Draft Plan raised concerns about the impact of the South East Gateway site (EC9) on the Burnt Wall scheduled monument. In response to this, a Heritage Impact Assessment (HIA) was undertaken on this allocation and the other allocations within the plan (with the exception of Middlemore, the Knoll and Newnham Drive because they’re located within existing employment areas where no heritage concerns had been identified). Whilst heritage was a consideration in site selection the HIA itself was carried out after the sites had been selected for inclusion in the emerging draft plan and therefore did not directly inform whether they should be included or not in that version. It has however informed the decision as to whether they should remain as allocations in the proposed submission version. The outcomes of that assessment is available here and, along with the other studies, should be read in full. However for ease of reference the concluding summary of their findings has been set out in each of the summary tables below.

**Strategic Transport Assessment**

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6.20 Following on from consultation on the emerging draft plan the sites proposed as allocations were subject to a Strategic Transport Assessment\textsuperscript{17} which modelled the impact on the network of the allocation in the Proposed Submission Plan. This work has identified that the following junctions require improvement;

- A45 Braunston Road/Timken Way roundabout
- A45 Stefen Way/A425 roundabout
- Eastern Way/Northern Way roundabout

6.21 Further work will be required to establish the precise extent of the improvements however it is considered that there is sufficient highway land to accommodate such improvements, for example signalisation works. Consequently it is considered that highway impacts of the proposed allocations can be mitigated.

**Extensions to sites HO1 (Daventry South West) and HO2 (Micklewell Park)**

6.22 Further changes in the Proposed Submission plan compared to the emerging draft are that the allocations for HO1, Daventry South West, and HO2, Micklewell Park have extended in size and capacity (shown on the site selection map). The extension to site HO1 did not relate to another site already assessed (and therefore selected or not) and therefore no further explanation is required in this report. The extension to allocation HO2 (itself an extension of a site with an existing planning permission) seeks to incorporate a small part of site 301 which had not previously passed stage 2 of the assessment and therefore requires further explanation as to why this part of the site has been included.

6.23 The further extension to Micklewell Park was proposed through a response to the Emerging Draft consultation. This covers an area of 4.8 hectares comprising of the Welton Place farmstead, associated open land and a small agricultural field parcel. The principle issues that affected the suitability of site 301, as a whole, relate to the impact on landscape and the sites potential to lead to coalescence of Daventry and Welton village. These issues are not considered to affect the farmstead, which relates more to the consented Micklewell Park scheme. It is therefore considered appropriate for it to be included as part of a larger Micklewell Extension allocation.

**Outcomes from applying the site selection process**

\textsuperscript{17} Daventry District Part 2 Local Plan Transport Assessment available from; https://www.daventrydc.gov.uk/living/planning-policy/part-2-local-plan/evidence-base/
6.24 The table below sets out the stage that each site progressed to, this can also be seen on a map on page 27. For sites that didn’t progress beyond stages 1 or 2, the reasons are briefly provided in the table below including a brief overview of the Sustainability Appraisal, specifically any negative effects. Further details of these sites are also set out in the 2017 HELAA and the Sustainability Appraisal. Sites that progressed beyond this stage are dealt with in detail in appendix A.
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<td></td>
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<td></td>
</tr>
<tr>
<td>135</td>
<td>Employment</td>
<td>Land to the west of the Royal</td>
<td>4</td>
<td>Landscape impact of site, challenging topography and Biodiversity impacts</td>
<td>Significant negative effects on Landscape and townscape (9)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Oak Industrial Estate</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>203</td>
<td>Residential</td>
<td>Daventry Sports Park</td>
<td>5</td>
<td>Site is Public Open Space</td>
<td>Minor negative effects on air quality and noise (1), health and wellbeing (7), Landscape and townscape (9)</td>
</tr>
<tr>
<td>204</td>
<td>Employment</td>
<td>Browns Road</td>
<td></td>
<td>Difficulties in achieving vehicular access</td>
<td>Minor negative effects on air quality and noise (1), Biodiversity, flora and</td>
</tr>
<tr>
<td>Ref</td>
<td>Use</td>
<td>Name/Address</td>
<td>Stage Reached</td>
<td>HELAA Key issues</td>
<td>SA (Negative Effects)</td>
</tr>
<tr>
<td>-----</td>
<td>------------</td>
<td>-------------------------------</td>
<td>---------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1 2 3 3a 3b 4 5</td>
<td>fauna (3), landscape and townscape (9) and Soil, geology and land use (12).</td>
</tr>
<tr>
<td>208</td>
<td>Residential</td>
<td>Land North East of Borough Hill</td>
<td></td>
<td>Site is isolated from the town, would contribute to coalescence with Norton and have impact on setting of scheduled monument</td>
<td>Significant negative effects on Archaeological and cultural heritage (2) and Landscape and townscape (9)</td>
</tr>
<tr>
<td>209</td>
<td>Residential</td>
<td>Brookfield Farm, London Road</td>
<td></td>
<td>Site is isolated from the town, would contribute to coalescence with Dodford</td>
<td>Significant negative effects on Landscape and townscape (9)</td>
</tr>
<tr>
<td>298</td>
<td>Residential</td>
<td>Land North of Monksmoor</td>
<td></td>
<td>Part of site in Flood zone 3, Site would contribute to coalescence with Welton, impact on setting of a Grade 2 listed building.</td>
<td>Significant negative effects on Archaeological and cultural heritage (2) and Landscape and townscape (9)</td>
</tr>
<tr>
<td>300</td>
<td>Residential</td>
<td>Land South of Stefan Way</td>
<td></td>
<td>Landscape impact of the site, challenging topography and connectivity.</td>
<td>Significant negative effects on Landscape and townscape (9) and Soil, geology and landuse (12)</td>
</tr>
<tr>
<td>301</td>
<td>Residential</td>
<td>Land North of Micklewell Park 18</td>
<td></td>
<td>TPO covering most of the site, development of whole of site would result in coalescence with Welton.</td>
<td>Significant negative effects on Archaeological and cultural heritage (2) and Landscape and townscape (9)</td>
</tr>
</tbody>
</table>

18 Please see additional commentary in paragraphs 5.20 and 5.21 regarding part of the site coming forward as part of a larger allocation north of Micklewell Park
<table>
<thead>
<tr>
<th>Ref</th>
<th>Use</th>
<th>Name/Address</th>
<th>Stage Reached</th>
<th>HELAA Key issues</th>
<th>SA (Negative Effects)</th>
</tr>
</thead>
<tbody>
<tr>
<td>314</td>
<td>Residential</td>
<td>Land West of Daventry</td>
<td>1 2 3</td>
<td>Relatively poor connectivity, challenging topography and landscape impact.</td>
<td>Significant negative effects on Landscape and townscape (9)</td>
</tr>
<tr>
<td>134</td>
<td>Residential</td>
<td>Micklewell Extension</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>143</td>
<td>Employment</td>
<td>Nasmyth Road</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>259</td>
<td>Employment</td>
<td>Newnham Drive</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>260</td>
<td>Employment</td>
<td>The Knoll</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>278</td>
<td>Mixed use</td>
<td>Central Area site 1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>315</td>
<td>Residential</td>
<td>Middlemore</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>319</td>
<td>Mixed use</td>
<td>Central Area Sites 3 and 5</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Appendix A – Page 28
Appendix A – Page 30
Appendix A – Page 32
Appendix A – Page 33
Appendix A – Page 34
Appendix A – Page 36
Appendix A – Page 37
<table>
<thead>
<tr>
<th>Ref</th>
<th>Use</th>
<th>Name/Address</th>
<th>Stage Reached</th>
<th>HELAA Key issues</th>
<th>SA (Negative Effects)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>1</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>312</td>
<td>Residential</td>
<td>Daventry South East</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>321</td>
<td>Residential</td>
<td>Daventry North (west of A361)</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>322 (119 and 303)</td>
<td>Residential</td>
<td>Daventry South West</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>HO1</td>
<td>Residential</td>
<td>Daventry South West</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>323</td>
<td>Employment</td>
<td>South East Gateway (South of A45)</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
### APPENDIX A: Assessment of sites which reached at least Stage 3

**134**  
**Micklewell extension- Residential site**

<table>
<thead>
<tr>
<th><strong>Housing and Economic Land Availability Assessment Summary</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>The greenfield site would assist with the delivery of the WNJCS and would benefit from access to the services and facilities that will be provided as part of the Micklewell Park development. It is considered that the landscape impact would be similar to Micklewell Park although further detailed assessment would be required. The site is considered to be suitable for residential use.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Sustainability Appraisal</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>The SA shows there is no significant negative impact. There are minor negative impact on biodiversity (3), landscape and townscapes (9) and soil, geology and land use (12). There is an unknown effect on archaeology and cultural heritage (2) and population and social deprivation (11).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Strategic Flood Risk Assessment</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Water – Avoid development in small section of surface water flood area.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Water and Waste-water Infrastructure Capacity Assessment</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall RAG rating: AMBER - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Landscape- Capacity to Accommodate Change</strong></th>
</tr>
</thead>
</table>
| **Moderate-low**  
The site’s capacity to accommodate change would be moderate-low as development would alter the characteristics from an existing open rural landscape by extending the northern edge of Daventry onto high ground. However, there would be opportunity to mitigate some of those adverse effects by creating a new hedgerow boundary with hedgerow trees along the northern site boundary. In keeping with local landscape characteristics, the highest ground on the site (near to the 165m AOD contour) should incorporate some woodland copse planting. The narrow easternmost part of the site would be difficult to develop and this could also be reserved for woodland, supplementing the wooded edge to the neighbouring Welton Place Farm. Woodland planting in these locations would provide a background to any proposed development, reducing the prominence of building form in views. It would also help maintain landscape characteristics on the site’s most prominent ground, mitigate for potential intervisibility with Welton and help integrate any proposed development. The existing southern and western hedgerow boundaries should also be enhanced to assist with mitigation of any proposed development and to integrate with the proposed landscape treatment to the consented scheme for Micklewell Park, as per the masterplan. |

<table>
<thead>
<tr>
<th><strong>Assessment and Conclusion at Stage 3</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Site is considered to be a sustainable location for growth as part of an extension to the existing site that has outline consent, Micklewell Park. The impact on landscape remains important (recognised in the SA) and will require necessary assessment and mitigation however it is considered that this could be achieved and the site should proceed for inclusion in the plan.</td>
</tr>
</tbody>
</table>
### Proceed as Allocation in Emerging Draft Part 2 Local Plan? (Stage 4)

Yes – Proposed Local Plan Allocation HO2

<table>
<thead>
<tr>
<th>Implications of Consultation, Heritage Impact Assessment and Strategic Transport Assessment (Stage 5)</th>
</tr>
</thead>
</table>

**Implications of consultation**

It is not considered that the consultation responses would affect this site proceeding as an allocation. Site could also be extended to include the Welton Place farmstead.

**Heritage Impact Assessment (June 2018)**

This assessment covered the original allocation at emerging draft stage and the further extension.

It is considered that development of the allocation site could result in less than substantial harm to the historic farmstead and potential archaeological remains however these impacts could be mitigated through sensitive design and recording that could reduce the impact to the lower end of less than substantial harm or avoid harm all together.

**Strategic Transport Assessment (August 2018)**

The Strategic Transport Assessment confirmed that the impacts on the highway network can be adequately mitigated.

Site should proceed as allocation in Proposed Submission Part 2 Local Plan – allocation HO2
Housing and Economic Land Availability Assessment Summary

The greenfield site is located adjacent to Drayton Fields and Apex Park and therefore provides an opportunity to support the expansion of an existing employment area and meet the demand for small and medium sized units.

Sustainability Appraisal

The site will have no significant negative effects but minor negative impacts on landscape and townscape (obj 9) and soil geology (obj 12). There is an unknown effect on air quality and noise.

Strategic Flood Risk Assessment

Surface Water : Avoid development in small section of surface water flood area.

Watercycle Study

Overall RAG rating- AMBER - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required

Landscape- Capacity to Accommodate Change

Low/Moderate-low

Both parts of the site are on high ground which contribute to the setting of Daventry and are also visually prominent from land to the west and from the PRoW network.

The southern part of the site would be screened from views to the south by the development currently under construction and would also be partly screened from westerly views by the landscape mitigation forming part of the same development. However, the southern part would still be visible from the north west and north. The existing hedgerow boundaries could be strengthened with additional planting but any proposed employment development would be taller than any hedge or tree planting even at full establishment. Overall, the southern part of the site would have a moderate-low capacity to accommodate change as some of the landscape and visual qualities would be eroded.

The northern part of the site has steeply sloping landform and it is assumed that significant modification to the landform would be required to enable development. This is likely to require the creation of a large area of level land with an engineered steep slope along the northern and western edges. This would have an extremely adverse impact on landscape character and would be very difficult to mitigate. Building form in the northern part of the site would be visible from the west and
north. The northern part of the site would have low capacity to accommodate change as some of the landscape and visual qualities would be severely eroded.

**Assessment and Conclusion at Stage 3**

Mitigating the impact on landscape is an important constraint affecting this site, recognised in the landscape assessment work and as a negative effect in the SA. However it is considered through sensitive design, restricting the mass of the units and ensuring appropriate landscaping that the site can help to meet identified demand for employment land at Daventry Town. Consequently it should be considered to inclusion in the plan.

**Proceed as Allocation in Emerging Draft Part 2 Local Plan? (Stage 4)**

Yes – Proposed Local Plan Allocation EC7

**Implications of Consultation, Heritage Impact Assessment and Strategic Transport Assessment (Stage 5)**

**Implications of consultation**

It is not considered that the consultation responses would affect this site proceeding as an allocation.

**Heritage Impact Assessment (June 2018)**

It is considered that development of the allocation site could result in less than substantial harm to the Historic Landscape Character and potential archaeological remains however these impacts could be mitigated through sensitive design and recording that could reduce the impact to the lower end of less than substantial harm or avoid harm all together.

**Strategic Transport Assessment (August 2018)**

The Strategic Transport Assessment confirmed that the impacts on the highway network can be adequately mitigated.

**Site should proceed as allocation in Proposed Submission Part 2 Local Plan – allocation EC7**
### Newnham Drive - Employment site

<table>
<thead>
<tr>
<th><strong>Housing and Economic Land Availability Assessment Summary</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>By virtue of the site being situated within an existing employment area it is considered that it would be suitable for employment use.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Sustainability Appraisal</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>The site will have no significant negative or uncertain effects.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Strategic Flood Risk Assessment (Ref as Farnborough Drive in the SFRA)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface water: A surface water flow paths runs along the eastern boundary of the site. Avoid development in surface water flood area.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Water and Waste-water Infrastructure Capacity Assessment</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall RAG rating - AMBER - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Landscape - Capacity to Accommodate Change</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Not subject to assessment – within urban area of the town</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Assessment and Conclusion at Stage 3</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Within an existing employment area, the vacant site is considered suitable for employment use, it will have no significant negative effects in the SA and should proceed to allocation in the Part 2 Local Plan.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Proceed as Allocation in Emerging Draft Part 2 Local Plan? (Stage 4)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes - Local Plan Allocation EC5</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Implications of Consultation and Strategic Transport Assessment (Stage 5)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Implications of consultation</td>
</tr>
<tr>
<td>It is not considered that the consultation responses would affect this site proceeding as an allocation</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Strategic Transport Assessment (August 2018)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>The Strategic Transport Assessment confirmed that the impacts on the highway network can be adequately mitigated.</td>
</tr>
</tbody>
</table>

**Site should proceed as allocation in Proposed Submission Part 2 Local Plan – allocation EC5**
### Housing and Economic Land Availability Assessment Summary

By virtue of the site being situated within an existing employment area it is considered that it would be suitable for employment use.

### Sustainability Appraisal

The site will have no significant negative or uncertain effects.

### Strategic Flood Risk Assessment

Flooding has been experienced on the site (or within close proximity). A DGS Flood incident identified within 100m of the site, relating to surface water system capacity issue, resulting in a surcharge. A capacity assessment is required as part of any development coming forward.

### Water and Waste-water Infrastructure Capacity Assessment

Overall RAG rating - AMBER - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required.

### Landscape - Capacity to Accommodate Change

Not subject to assessment – within urban area of the town.

### Assessment and Conclusion at Stage 3

Within an existing employment area, the vacant site is considered suitable for employment use, the SA does not identify any significant negative effects, and the site should proceed to allocation in the Part 2 Local Plan.

### Proceed as Allocation in Emerging Draft Part 2 Local Plan? (Stage 4)

Yes – Proposed Local Plan Allocation EC6

### Implications of Consultation and Strategic Transport Assessment (Stage 5)

### Implications of consultation

It is not considered that the consultation responses would affect this site proceeding as an allocation.

### Strategic Transport Assessment (August 2018)

The Strategic Transport Assessment confirmed that the impacts on the highway network can be
adequately mitigated.

Site should proceed as allocation in Proposed Submission Part 2 Local Plan – allocation EC6

<table>
<thead>
<tr>
<th>278</th>
<th>Central Area Site 1- Mixed use Predominantly Commercial Town Centre Scheme</th>
</tr>
</thead>
</table>

**Housing and Economic Land Availability Assessment Summary**

This brownfield site is in close proximity to existing residential development and is within the defined town centre. The site is considered to be suitable for residential development as part of a mixed use scheme.

**Sustainability Appraisal**

The site will have no significant negative or uncertain effects.

**Strategic Flood Risk Assessment**

Surface water: A surface water flow path runs through the sites, ensure that development is avoided in surface water flood areas.

Flood incidents: A flood incident relating to highway drainage incapacity is located to the south of the site; highway surface water drainage to be investigated as part of any proposal coming forward. A DG5 incident relating to surface water sewer flooding is located in close proximity to the northern boundary of the site. A capacity assessment is required as part of any development proposal coming forward.

**Watercycle Study**

Overall RAG rating- AMBER - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required

**Landscape- Capacity to Accommodate Change**

Not subject to assessment – within urban area of the town
### Assessment and Conclusion at Stage 3

The site, in the town centre and already identified through the Town Centre vision\(^\text{19}\) is considered to be an important site for town centre uses, will help to regenerate the town centre, the SA does not identify any significant negative effects, and should proceed for inclusion in the plan.

### Proceed as Allocation in Emerging Draft Part 2 Local Plan? (Stage 4)

Yes – Proposed Local Plan Allocation EC2

### Implications of Consultation, Heritage Impact Assessment and Strategic Transport Assessment (Stage 5)

#### Implications of Consultation

It is not considered that the consultation responses would affect this site proceeding as an allocation.

#### Heritage Impact Assessment (June 2018)

It is considered that there are slight heritage concerns regarding development of the allocation site. Currently the site does not contribute towards the character or appearance of the Daventry Town Centre Conservation Area or the listed buildings along the High Street or Brook Street although development of the allocation site has the potential to alter this both positively and negatively. In addition, there are also slight concerns regarding the non-designated building containing the council offices and library, known and as yet unknown archaeological remains and cumulative impacts to key views as identified in the CAAMP. It is considered that the effects upon these could be mitigated and would amount to less than substantial harm or no harm though careful design

#### Strategic Transport Assessment (August 2018)

The Strategic Transport Assessment confirmed that the impacts on the highway network can be adequately mitigated.

**Site should proceed as allocation in Proposed Submission Part 2 Local Plan – allocation EC2**

---

\(^{19}\) Town Centre Vision – available from https://www.daventrydc.gov.uk/living/planning-policy/part-2-local-plans/evidence-base/
<table>
<thead>
<tr>
<th><strong>Middlemore- Residential Site</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Housing and Economic Land Availability Assessment Summary</strong></td>
</tr>
<tr>
<td>As a consequence of it being located on an existing allocation in the 1997 Local Plan, within the urban area of Daventry the principle of development is considered to acceptable and therefore the site is considered to be suitable</td>
</tr>
<tr>
<td><strong>Sustainability Appraisal</strong></td>
</tr>
<tr>
<td>The SA shows there are no significant negative effects. There are uncertain effects for air quality and noise (1), biodiversity and flora and fauna (3).</td>
</tr>
<tr>
<td><strong>Strategic Flood Risk Assessment</strong></td>
</tr>
<tr>
<td>Reservoir Flooding: Although the site is located close to Drayton Reservoir, breach analysis models do not show inundation to the site.</td>
</tr>
<tr>
<td><strong>Water and Waste-water Infrastructure Capacity Assessment</strong></td>
</tr>
<tr>
<td>Not assessed</td>
</tr>
<tr>
<td><strong>Landscape- Capacity to Accommodate Change</strong></td>
</tr>
<tr>
<td>Not subject to assessment – within urban area of the town</td>
</tr>
<tr>
<td><strong>Assessment and Conclusion at Stage 3</strong></td>
</tr>
<tr>
<td>The site, within an existing residential area and previously identified as an allocation in the existing local plan does not result in any negative effects (SA). It should proceed for inclusion in the plan.</td>
</tr>
<tr>
<td><strong>Proceed as Allocation in Emerging Draft Part 2 Local Plan? (Stage 4)</strong></td>
</tr>
<tr>
<td>Yes - Proposed Local Plan Allocation HO3</td>
</tr>
<tr>
<td><strong>Implications of Consultation and Strategic Transport Assessment (Stage 5)</strong></td>
</tr>
<tr>
<td><strong>Implications of consultation</strong></td>
</tr>
<tr>
<td>It is not considered that the consultation responses would affect this site proceeding as an allocation</td>
</tr>
<tr>
<td><strong>Strategic Transport Assessment (August 2018)</strong></td>
</tr>
</tbody>
</table>
| The Strategic Transport Assessment confirmed that the impacts on the highway network can be
Site should proceed as allocation in Proposed Submission Part 2 Local Plan – allocation HO4

<table>
<thead>
<tr>
<th>319</th>
<th>Central Area Sites 3 and 5 – Mixed use site with Commercial and Residential</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Housing and Economic Land Availability Assessment Summary</strong></td>
<td></td>
</tr>
<tr>
<td>Part greenfield and part brownfield site close to the edge of the town centre. Site related well to existing residential development and close to services and facilities in the town centre. The loss of open space would need to be mitigated and compensatory provision would need to be provided. A suitable site for residential as part of a mixed use scheme.</td>
<td></td>
</tr>
<tr>
<td><strong>Sustainability Appraisal</strong></td>
<td></td>
</tr>
<tr>
<td>The site will have no significant negative or uncertain effects.</td>
<td></td>
</tr>
<tr>
<td><strong>Strategic Flood Risk Assessment</strong></td>
<td></td>
</tr>
<tr>
<td>Surface water: The majority of the site is subject to high surface water flood risk. Density and housing numbers to be determined. Consideration should be given to locating less vulnerable use development in the surface water flood risk areas.</td>
<td></td>
</tr>
<tr>
<td><strong>Water and Waste-water Infrastructure Capacity Assessment</strong></td>
<td></td>
</tr>
<tr>
<td>Overall RAG rating- AMBER - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required</td>
<td></td>
</tr>
<tr>
<td><strong>Landscape Capacity to Accommodate Change</strong></td>
<td></td>
</tr>
<tr>
<td>Not subject to assessment</td>
<td></td>
</tr>
</tbody>
</table>
**Assessment and Conclusion at Stage 3**

The site, in close proximity to the town centre and already identified through the Town Centre vision\(^20\) is considered to be an appropriate location for a mixed-use development and should proceed for inclusion in the plan.

<table>
<thead>
<tr>
<th>Proceed as Allocation in Emerging Draft Part 2 Local Plan? (Stage 4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes – Proposed Local Plan Allocation EC3</td>
</tr>
</tbody>
</table>

**Implications of Consultation, Heritage Impact Assessment and Strategic Transport Assessment (Stage 5)**

**Implications of consultation**

It is not considered that the consultation responses would affect this site proceeding as an allocation.

**Heritage Impact Assessment (June 2018)**

It is considered that there are slight heritage concerns regarding development of the allocation site particularly relating to the Daventry Reservoir Conservation Area, long distance views of the Daventry Town Centre Conservation and the impact upon known and as yet unknown archaeological remains that might be present. It is considered that the effects upon these could be mitigated and would amount to less than substantial harm or no harm though careful design.

**Strategic Transport Assessment (August 2018)**

The Strategic Transport Assessment confirmed that the impacts on the highway network can be adequately mitigated.

**Site should proceed as allocation in Proposed Submission Part 2 Local Plan – allocation EC3**

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Housing and Economic Land Availability Assessment Summary

Whilst development of this site could improve the gateway of the town, the topography and landscape constraints as well as the heritage assets are important features which would require mitigation and could affect the capacity of the site. Protecting the setting of Borough Hill and Burnt Walls are considered to be of particular importance. A further constraint is also to ensure there is sufficient space between new residential and existing employment uses. The site would also require connectivity improvements to allow access to existing residential uses. This requires more in depth assessment.

Sustainability Appraisal

The SA shows the significant negative impacts are on archaeology and cultural heritage (obj 2) landscape and townscape (obj 9) with minor negative impact on biodiversity (obj 3) and soil geology (obj 12). There is an unknown effect on air quality and noise (1).

Strategic Flood Risk Assessment

Several surface water flow paths run through the site, including adjacent to the ordinary watercourse. Avoid development in surface water flood area. Ordinary watercourse runs through the site which will require detailed modelling to ascertain floodplain extent. Any development should not take place within 9m to ensure adequate maintenance and accessibility. The eastern section of the site is susceptible to groundwater flooding. Any development would need to avoid basements and ensure adequate mitigation measures are incorporated.

Watercycle Study

Overall RAG rating - AMBER - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required

Landscape- Capacity to Accommodate Change

Low/Moderate-low/Moderate-high

This is a large site that already contains some development on low ground along the eastern edge of Daventry. The site then extends east to include a small river valley, Scheduled Monument, arable and pastoral fields and the southern lower slopes of Borough Hill to the north and Newnham Hill to the south. The capacity to accommodate change on the site varies. The capacity has been split into three distinct zones from lowest to highest capacity: upper slopes of both Borough Hill to the north and Newnham Hill to the south, and east of the unnamed road; low arable and pastoral fields following the river valley up the unnamed rural track linking London Road with Borough Hill Farm and existing developed land.

The upper slopes of Borough Hill and the fields beyond built up development south of London Road (on the lowest slopes of Newnham Hill) have a low capacity to accommodate change. Development
on these parts of the site would be prominent in the landscape and contrary to settlement pattern (Daventry is developed on low ground). In addition the smaller fields bounded by unclipped hedgerows in the north western part of the site form an integral part of the character of Borough Hill in views, development on these slopes would interrupt views towards Borough Hill. The land to the east of the unnamed road also has a low capacity to accommodate change. Development on this part of the site would adversely affect views towards Borough Hill from London Road east of the site, potentially increase intervisibility between Daventry and Dodford and alter the character of a generally rural river valley landscape that is characteristic of the landscape on the eastern side of Daventry.

The land either side of the river on low ground north of London Road up to the unnamed road has a moderate-low capacity to accommodate change. Any proposed development would alter the character from farmland to medium density residential development with road infrastructure. Development on this rural farmed eastern part of the site would alter and extend urban influences into the countryside. This would be most notable along the unnamed road heading north east, on the approach into Daventry along London Road and from the unnamed road linking London Road to Newnham to the south. Mitigation of effects for development in this part of the site should include providing a comprehensive landscape framework, which incorporated the site and setting to the Scheduled Monument and the river valley as well as open space along the eastern boundary. Copses of trees, hedgerows, individual trees and enhancement of the riparian vegetation along the watercourse should form an integral part of any landscape framework. The landscape treatment should extend to include open space along the unnamed rural track to ensure a vegetated edge to the town and help reduce urban influences on the surrounding countryside. Land east of this unnamed track should not be developed. The landform in combination with landscape mitigation would help to reduce effects on landscape character further to the east on countryside between the site and Dodford.

There is a high capacity to accommodate change within the already developed western parts of the site for any proposed redevelopment. Any proposed redevelopment on this part of the site should retain existing trees and incorporate new trees and woodlands along the site boundaries to help soften the appearance of development when viewed from PRoW in the wider countryside to the east.

**Assessment and Conclusion at Stage 3**

The proximity and setting of Burnt Walls and Borough Hill are identified as key constraints for the site, Historic England have identified potential for substantial harm. In addition the landscape setting of Newnham Hill and Borough Hill are important. Furthermore the proximity to employment land is a potential constraint relating to noise and a barrier to access the town. The site also features areas at risk of surface and groundwater flooding.

However the Council has, for some time, identified the potential benefits from residential led regeneration in this area of the town, including the provision of gateway features. In order to evaluate more fully the strength of the objections from Historic England, to enable an exploration of the potential to address those concerns, and to enable a judgment to be made weighing these
objections in the planning balance with the prospect of residential led regeneration, this site was progressed to a workshop at stage 4a.

**Stage 3a OPUN Report Summary**

The land at Daventry South East presents significant challenges that limit its capacity for new development. Managing the tensions between the landscape, the setting and location of scheduled monuments, and the topography means much of the site is unlikely to be suitable for development. Of particular note are concerns from Historic England about the impact any development in this area would have on the two heritage assets. The loss of employment land is also problematic.

Limited development near to the industrial uses to the west of the site may be possible, but this may not address concerns around integration with the existing town. We estimate that, should all the developable areas be built out at around 30 dwellings per hectare, around 375 units could be delivered across the various parts of the site. However, we urge the Council to careful consider the balance of benefits before releasing sites in this location for development due to the various constraints on site, and to be mindful of the wider aspirations within Council policy to create sustainable new extensions to Daventry.

Should development be allowed in this area, then it should be done so after a strong design case has been made which demonstrates that it adds to rather than detracts from what is a special and sensitive location and that development here can provide an over-riding public benefit.

**Assessment and Conclusion at Stage 3a**

The objections articulated by Historic England in their letter and at the workshop are considered to be of such strength, that it would not be appropriate to pursue the entirety of this site further. Part of this consideration is that other sites were available, and although they have constraints, as explored through the workshops at stage 4b these were not as strong as those for this site.

Furthermore the need to mitigate the impact on the Scheduled Monuments (where possible), recognised as a significant negative effect in the SA, the landscape setting of both Borough Hill and Newnham Hill (also identified as a significant negative effect) and provide a sufficient buffer between existing employment uses and any residential development, significantly limits the capacity of the site which is not considered sufficient to create a sustainable community.

In order to seek to achieve the gateway improvements part of this site was considered further for employment uses - see ref 323.

**Proceed to Allocation in Emerging Draft Part 2 Local Plan (Stage 4)?**

Not as housing site – part of the site considered for employment.
### Housing and Economic Land Availability Assessment Summary

The site has landscape and heritage constraints which could affect the amount of land suitable for development, most notably the Canal Conservation Area. The site is also relatively distant from the town centre but could access planned infrastructure nearby. At present, due to the constraints of the site the site is not considered to be suitable for a scale of development that would create a sustainable community. However further assessment is required to determine whether the site should come forward for development.

### Sustainability Appraisal

**Site 303 – East of Micklewell.** The SA shows there is no significant negative impact. There are minor negative impact on archaeology (2), biodiversity (3) and soil (12). There is an unknown effect on air quality and noise.

**Site 119 – North of Middlemore.** The SA shows the significant negative impacts are on archaeology and cultural heritage (obj 2) landscape and townscape (obj 9) with minor impact are on biodiversity (obj 3) and soil geology (obj 12) There is a unknown effect on air quality and noise.

### Strategic Flood Risk Assessment

Three surface water flow paths run through the site, including adjacent to the ordinary watercourse.

Ordinary watercourse runs through the site which will require detailed modelling to ascertain floodplain extent. Any development should not take place within 9m to ensure adequate maintenance and accessibility. Avoid development in surface water flood area.

### Water and Waste-water Infrastructure Capacity Assessment

Overall RAG rating: RED - Major Constraints to Provision of infrastructure and/or treatment to serve proposed growth. Substantial off-site network reinforcement required.

### Landscape- Capacity to Accommodate Change

Low/Moderate-low

Most of the site’s capacity to accommodate change would be **moderate-low**; extending the northern edge of Daventry would alter the characteristics from an existing open rural landscape, that contributes to the settlement setting, to residential development. However, there would be opportunity to mitigate some of those adverse effects by implementing the recommendations identified in the study. In addition, the highest ground on the site (near to the 160m AOD contour) could incorporate some woodland copse planting. Woodland planting in these locations would provide backgrounding to any proposed development, reducing the prominence of any building form in views from the north, west and south. It would also help maintain landscape characteristics on the site’s most prominent ground and help integrate any proposed development. This woodland planting would also form part of an open space corridor incorporating the PRoW. The potential...
landscaped open corridor through the central part of the site should include a variety of treatments from grassed areas, areas of shrub planting, specimen trees, copses and screen planting to create a distinctive series of spaces. This is important to either side of the Grand Union Canal Recreational Route to ensure that any development on site links with the existing residential edge of Daventry and to linear open space to the east of the A361. Enhancement of the watercourse corridor in the site would retain further landscape features of the site.

The sensitivity of some of the western part of the site and the low mitigation potential of any proposed development was conveyed in the section ‘Overall Mitigation Potential’. This part of the site would have a low capacity to accommodate change.

Assessment and Conclusion at Stage 3

Although this site has some constraints, including landscape and heritage, it is one of the least constrained sites of those assessed. Given that it does not offer the regeneration benefits offered by Daventry South East, this site was not considered the most appropriate for allocation at this stage.

However following the assessment of Daventry South East through the OPUN design review process, it was decided to further evaluate this and a site at Daventry South West through the OPUN review process at Stage 3b.

Stage 3b

OPUN Report Summary

The land at Daventry north presents significant design challenges that limit its capacity for new development. Managing the tensions between the landscape, the setting and location of the Grand Union Canal conservation area, long views from the neighbouring village of Braunston and onto the church spire of All Saints, and the topography, means much of the site is unlikely to be suitable for development. This is especially true for land north of the Canal.

Limited development to the south west of the site may be possible, but accessing this remote portion of the site would likely require access to be taken through the un-adopted street network of Middlemore. Whilst pedestrian and cycle connections through Middlemore are feasible, connecting for vehicles through the street network of this estate is likely to be problematic.

There is also potential for development on the eastern edge of the site, next to the proposed development at Mickle Well Park. This is the most suitable location for facilities that can be shared by residents from Middlemore, Mickle Well Park and any development on this site. However, there are significant constraints on this portion of the site that may render it undevelopable. Should the site be developable, our estimate is that it could deliver around 285 units.

Assessment and Conclusion at Stage 3b

As identified at the OPUN review the heritage and landscape constraints affect the amount of land that could come forward for development, with the setting of the Grand Union Canal conservation area a particular constraint. As crossing points over the Grand Union canal are considered to affect
its setting (recognised as a significant negative effect in the SA) this would need to be restricted which would affect how the site could be accessed from the A361 and how internal access arrangements could be laid out. This, and the need to mitigate the impact on landscape, affects the amount of land that is suitable for development and whilst it is relatively close to planned infrastructure provision at Micklewell Park, it is not considered that the site has sufficient capacity to create a sustainable community.

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<tr>
<th>Proceed as Allocation in Emerging Draft Part 2 Local Plan? (Stage4)</th>
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**Housing and Economic Land Availability Assessment Summary**

The mixed greenfield and brownfield site is situated on the edge of Daventry town. The site has landscape and transport infrastructure constraints which could limit the total development capacity. To create a sustainable extension to Daventry, the transport infrastructure constraints in particular need careful examination including access and the ability to safely cross the A45 as a pedestrian. If direct access across the A45 and via the A45 can be achieved then the site would be considered suitable. The setting of the listed building requires careful consideration however this could be managed with an appropriate landscape strategy. This site requires more in depth assessment.

**Sustainability Appraisal**

Assessed as site 202 (includes HELAA site 90): The SA shows the main significant negative impacts landscape and townscape (obj 9) with minor negative impact on are on archaeology and cultural heritage (obj 2) biodiversity (obj 3) and soil geology (obj 12). There is a unknown effect on air quality and noise.

**Strategic Flood Risk Assessment**

Three surface water flow paths run through the sites. Avoid development in surface water area.

**Water and Waste-water Infrastructure Capacity Assessment**

Overall RAG rating- RED - Major Constraints to Provision of infrastructure and/or treatment to serve proposed growth. Substantial off-site network reinforcement required

**Landscape- Capacity to Accommodate Change**

Low

The site is an integral part of the Ironstone Hills landscape character type although the landform of Big Hill does provide visual screening of the site from the wider part of this LCT to the south. The land is arable and pastoral farmland with small woodland blocks that makes an important contribution to the rural approaches into Daventry from the A425 and A361 to the south and countryside on the doorstep from Daventry. The existing settlement edge is contained by the A45 and a belt of trees along the roadside edge, developing this site would break this strong edge and extend development into a relatively rural landscape, which despite proximity to Daventry has relatively few urban influences.

Incorporating open space to the boundary with the A425 and retaining Staverton Lane bordered by trees and hedgerows as well as retaining the vegetated edges of the site and providing open space in the triangular field adjacent to the A45 slip road to the east would help to limit urban influences on the approaches into Daventry. However even with mitigation in the form of woodland and trees consistent with landscape character it would be difficult to screen development entirely and urban influences would increase. The site has a low capacity to accommodate change.
## Assessment and Conclusion at Stage 3

Although this site has some constraints, including landscape, it is one of the least constrained sites of those assessed. Given that it does not offer the regeneration benefits offered by Daventry South East, this site was not considered the most appropriate for allocation at this stage, although it is recognised that it has the potential to provide good access to existing services and facilities including the Town Centre.

However following the assessment of Daventry South East through the OPUN design review process, it was decided to further evaluate this and a site at Daventry North through the OPUN review process at Stage 3b.

## Stage 3b

### OPUN Report Summary

The land at Daventry South West presents a promising opportunity to add much-needed new housing to the town. The site has landscape and transport infrastructure constraints which could limit the total development capacity. To create a sustainable extension to Daventry, the transport infrastructure constraints in particular need careful examination and a comprehensive strategy in order to overcome them.

How the site manages the setting of the listed building adjacent to the site boundary also needs careful consideration, but with an appropriate landscape strategy, the Panel feels that this can be sufficiently managed.

Overall, it is estimated that the site could deliver around 1,350 new homes at a density of 30 dwellings per hectare, although space needs to be allowed for a new school and new public open space on site.

## Assessment and Conclusion at Stage 3b

It is acknowledged that there are landscape constraints to this site in that it is identified as having low capacity to accommodate change. However it is considered that mitigation of the landscape impacts (including the setting of Big Hill) does not substantially affect the capacity of the site. Further to the landscape impacts, compared to alternative sites it represents the most sustainable option for significant expansion at Daventry, with sufficient capacity (at least 800 dwellings) to deliver a scheme that includes on-site infrastructure, including a Primary School to help deliver a sustainable community.

Initial transport modelling has identified that direct access from the A45 (Stefen way) can be achieved on to the site, including an at grade pedestrian crossing which will ensure that it provides good accessibility to existing services and facilities in the town, including Daventry Campus of Northampton College and the town centre, approximately a 20 minute walk. This is a significant strength of the site compared to the alternatives at Daventry North and Daventry South East.

The impact on Badby House (Grade II listed) requires mitigation, however it is considered that can be achieved without significantly affecting the capacity of the site. This also applies to the need to avoid
development adjacent to the A45, which is an area identified as at risk of surface water flooding. Improvements to water infrastructure is also needed, however this can achieved.

**Proceed as Allocation in Part 2 Local Plan? (Stage 4)**

Yes - Proposed Local Plan Allocation HO1

**Implications of Consultation, Heritage Impact Assessment and Strategic Transport Assessment (Stage 5)**

**Implications of consultation**

It is not considered that the consultation responses would affect this site proceeding as an allocation. Particularly given the positive dialogue with Northamptonshire County Council on the access arrangements to the site.

**Heritage Impact Assessment (June 2018)**

In summary it is considered that there are slight heritage concerns regarding development of this allocation site particularly relating to Grade II listed Badby House, the two non-designated historic farmsteads and any as yet unknown archaeological remains that might be present. It is considered that development of the allocation site could result in less than substantial harm to the historic environment however it is also considered that there are opportunities for mitigation through sensitive design that could reduce this impact to the lower end of less than substantial harm or avoid harm all together to these heritage assets.

**Strategic Transport Assessment (August 2018)**

The Strategic Transport Assessment confirmed that the impacts on the highway network can be adequately mitigated. This is likely to require as a minimum improvements to the A45 Stefen Way/A425 roundabout

**Site should proceed as allocation in Proposed Submission Part 2 Local Plan – allocation HO1**
**South East Gateway- Employment Site**

### Housing and Economic Land Availability Assessment Summary

The part greenfield/part brownfield site is located adjacent to the Marches employment area and therefore provides an opportunity to support the expansion of an existing employment area and meet the demand for small and medium sized units in addition to improving the gateway to Daventry and meeting regeneration objectives for the town.

### Sustainability Appraisal

The SA shows that there will be a significant negative effect on archaeology and cultural heritage (2) and landscape and townscape (9) as development could impact directly on archaeological and cultural features associated with Borough Hill and Burnt Walls. There will be minor negative effects on air quality and noise (1), biodiversity (3) and soil, geology and land use (12).

### Strategic Flood Risk Assessment

**Surface water:** Several surface water flow paths run through the site. Avoid development in this area. Due to the topography, run of would flow down the hill, entering the site from the west and north. The south of the site would also receive run off from the south flowing down Newnham Hill.

**Ordinary watercourse:** Runs through the site which will require detailed modelling. No development should take place within 9 m to ensure adequate maintenance.

**Flood incident:** A DG5 flood incident has been reported within close proximity of the site. Further investigation relating to capacity is required.

**Groundwater:** The eastern section of the site is susceptible to groundwater flooding. Any development would need to avoid basements and ensure appropriate mitigation are incorporated.

**Level 2 SFRA** – there is an unmodelled ‘ordinary watercourse’ which runs through the centre of the site which may pose a risk to flooding.

**LFRMS:** Eastern half of the site is located within Weedon Ward (and identified as on the most at risk wards for combined flood risk from rivers, surface water and groundwater.

### Water and Waste-water Infrastructure Capacity Assessment

**Overall RAG rating:** AMBER - Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required.

### Landscape- Capacity to Accommodate Change

(Taken from assessment of site 312 but only where applies to this site)

Low/Moderate-High
The fields beyond built up development south of London Road (on the lowest slopes of Newnham Hill) have a low capacity to accommodate change. Development on these parts of the site would be prominent in the landscape and contrary to settlement pattern (Daventry is developed on low ground).

There is a high capacity to accommodate change within the already developed western parts of the site for any proposed redevelopment. Any proposed redevelopment on this part of the site should retain existing trees and incorporate new trees and woodlands along the site boundaries to help soften the appearance of development when viewed from PRoW in the wider countryside to the east.

**Assessment and Conclusion at Stage 3**

The area identified to the South of the A45, predominantly occupied by existing development is considered to represent a suitable location for accommodating additional employment land to meet the demand for smaller units whilst also providing associated regeneration benefits, improving an important gateway to the town. Concentrating development in this location is considered to reduce the impacts on Burnt Walls and Borough Hill Scheduled Monuments (recognised as significant in the SA and the OPUN review for Daventry South East as a whole) and could enhance their setting through replacing existing uses which do not respond positively to these assets, most notably the vehicle recycling facility.

The site includes an area extending east that is currently greenfield, this is recognised as having a low capacity to accommodate change and also a significant negative effect in the SA, however ensuring the development remains on low ground, adjacent to the A45 will help to mitigate this impact along with sensitive design, seeking to integrate development into the landscape as much as possible. Consequently is it considered that the site should be taken forward for inclusion in the plan.

**Proceed as Allocation in Part 2 Local Plan? (Stage 4)**

Yes - Proposed Local Plan Allocation EC9

**Implications of Consultation, Heritage Impact Assessment and Strategic Transport Assessment (Stage 5)**

**Implications of consultation**

It is not considered that the consultation responses would affect this site proceeding as an allocation. Whilst Historic England objected to part of the site coming forward the Heritage Impact Assessment, outlined below, sets out that harm related to the historic environment can be mitigated.

**Heritage Impact Assessment (June 2018)**

In summary it is considered that development within the allocation site will not result in harm to the heritage significance of Borough Hill and Burnt Walls scheduled monuments but has the potential to impact upon the setting Daventry Wood Farm (a non-designated historic farmstead) and could
impact upon as yet unknown archaeological remains the significance of which is unknown. It is considered that any harm to the historic environment can be suitably mitigated to the lower end of less than substantial harm or avoid harm altogether.

**Strategic Transport Assessment (August 2018)**

The Strategic Transport Assessment confirmed that the impacts on the highway network can be adequately mitigated.

**Site should proceed as allocation in Proposed Submission Part 2 Local Plan – allocation EC9**
APPENDIX B: Correspondence with Historic England regarding Daventry South East
1 February 2017

Dear Ms Parry

Daventry District’s Part 2 Local Plan – Potential allocation at Daventry South East Gateway

Thank you for consulting Historic England on the above 17 January 2017; Historic England welcome the opportunity for early, informal involvement.

Historic England promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The historic environment should therefore play a critical role in sustainable development at the heart of all spatial planning work, as reflected within the National Planning Policy Framework (NPPF).

Daventry contains a wealth of heritage assets which play an important part in the local character and identity of the district. It is therefore important that this resource which includes both designated and non-designated heritage assets, is recognised, protected and, where possible, enhanced within the new Local Plan. Specifically, it is important that the local plan addresses the value of Daventry’s historic environment, and the risks it faces, in a commensurate manner. An unusual degree of care will need to be taken in preparing policies so that they play to the strengths which reside in the district’s heritage, and are clear how development should conserve and enhance it. We have undertaken an initial desk-based review of the site looking at the potential impact of the proposals on designated heritage assets and those areas of high archaeological potential, that appear in our records, including nationally important archaeological remains. Clearly, you will need to seek the advice of the Historic Environment Record (HER) and County Archaeological Advisors on non-designated sites.

Historic England has also recently published a document relating to site allocations in Local Plans – this covers all types of allocation and sets out a site selection methodology
in relation to heritage assets. We consider this may be of use to you, and the document can be downloaded from:


We have the following initial comments on the site. Notwithstanding the advice given in this letter, we reserve the right at a later stage to comment or object to any proposals that come forward as part of the Local Plan.

Historic England object to the proposed allocation. We consider that the allocation would result in substantial harm to heritage assets and their settings; enclosing the fortified enclosure known as ‘Burnt Walls’ earthwork a scheduled monument (NN39; NHLE 1003888) and being sited to the south of and within the rising topography of the Iron Age hillforts and defended enclosure, bronze age barrows, Roman buildings and barrow cemetery at Borough Hill also a scheduled monument (SM 17145; NHLE 1010696) and one of the largest of its type in the country. The proposed allocation would infill the open landscape between these two nationally important multi-period scheduled monuments which makes an important contribution to their significance and setting, reflecting the historic and spatial relationship between them. A further contribution is made by the spatial relationship with historic routes within this landscape such as following the line of the modern A45; this would also be impacted by the proposed allocation.

As such, Historic England do not consider the allocation to be sound in accordance with the NPPF.

Please do not hesitate to contact me if you wish to discuss any of these comments.

Yours sincerely

Emilie Carr (Mrs)
Historic Environment Planning Adviser
E-mail: Emilie.carr@HistoricEngland.org.uk
Dear Ms Parry

Daventry District’s Part 2 Local Plan – Potential allocation at Daventry South East Gateway

Thank you for the opportunity to attend the OPUN workshop last week on 25th April. Historic England welcomed the opportunity for early, informal involvement as part of joint discussion with other statutory consultees and stakeholders.

Following the OPUN workshop and as described in our previous letter of 01 February of this year and our subsequent meeting on 01 March, Historic England object to the proposed allocation. As explained at the workshop, we consider that the allocation would result in substantial harm to the significance nationally important heritage assets derive from their settings. Those designated heritage assets, both scheduled monuments, that would be significantly affected by the allocation are the Iron Age hillforts and defended enclosure, bronze age barrows, Roman buildings and barrow cemetery at Borough Hill (SM 17145; NHLE 1010696) and the fortified enclosure known as ‘Burnt Walls’ earthwork (NN39; NHLE 1003888) that is sited directly to the south of Borough Hill and within its rising topography reflecting the historic and spatial relationship between the two monuments. The proposed allocation would intrude into and infill the remaining open landscape between and surrounding these two nationally important multi-period scheduled monuments. As we explained at the site visit and in subsequent discussion this open landscape and the contours of Borough Hill itself beyond the scheduled area make an important contribution to the significance of both monuments and form a key element of their settings.

As such, I would strongly stress again that Historic England do not consider the allocation to be sound in accordance with the NPPF.

Given the constraints discussed at the workshop which would significantly reduce the size of the site that could potentially be developed, together with the level of further detailed work, assessment and investigation required and the time that this would take, it again raises the question of appropriate deliverability of the site. I would again strongly encourage opportunities to ‘unlock’ other sites such as the North East SUE, where significant work has already been undertaken.
The exclusion of scheduled ancient monuments within the draft Land Availability Assessment Methodology paragraph 2.12 was strongly welcomed last year. I would again reiterate Historic England’s comments that within paragraph 2.18, although the inclusion of heritage assets as a factor is strongly welcomed, this would be strengthened by reference to settings as detailed in my letter of 14 September 2016. This point is of particular reference to this case.

Following the meeting last week with OPUN, I also wanted to take the opportunity to provide links to our guidance should a significantly smaller development based upon the existing developed sites to the west be investigated. As we stressed, concerns may remain in any case, but it would not be possible to comment in more detail on the level of potential impacts without further detailed assessment. Good Practice Advice 1 – 3 and Historic England Advice Note 3 (The Historic Environment and Site Allocations) through the following link will be of particular relevance:

https://historicengland.org.uk/advice/planning/planning-system/

Historic England would be very happy to advise further if required.

Notwithstanding the advice given in this letter, we reserve the right at a later stage to comment or object to any proposals that come forward as part of the Local Plan.

Please do not hesitate to contact me if you wish to discuss any of these comments.

Yours sincerely

[Signature]

Emilie Carr (Mrs)
Historic Environment Planning Adviser
E-mail: Emilie.carr@HistoricEngland.org.uk