

**Daventry District Settlements and Countryside Local Plan – Responses to Regulation 19 Consultation (Representation Order)**

Representor ID	Representation ID	Representor Name	Representor Organisation (If Applicable)	Client (If represented by Agent)	Appear at Hearings?	Legal Compliance	Duty to Cooperate	Sound?	Chapter	Policy	Other ref e.g. Appendix/ Map/ SA	Summary of main issues raised	Summary of Modifications suggested	LPA Comment
PS001	PS001/01	Mr G Pullin			No	Not specified	Not specified	Not specified		5RA6		Government's rural exception policy is ill-judged and goes against concept of local planning. May enable confines of villages to be looser than over-tight lines suggested. Conservation status is far too rigid.	None Specified	The plan must be consistent with national policy which includes the rural exception approach. Conservation areas are designated outside of the Local Plan process.
PS001	PS001/02	Mr G Pullin			No	Not specified	Not specified	Not specified		6HO1		Daventry South West not well connected to the town centre – vehicle route will disrupt the Grange estate. Access arrangements will affect safety of A45, important national road. Site will be new village and should be designed as such with access from the A361 and A425.	None Specified	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocation at Daventry South West is sustainable and deliverable and will support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. The policy requirements in HO1 will help to ensure the site is well connected to the town for pedestrians and cyclists.
PS001	PS001/03	Mr G Pullin			No	Not specified	Not specified	Not specified		6HO3		Access to the site from A361 should be carefully combined with better access to Braunston. Roundabouts not efficient for traffic movements causing environmental harm. Traffic lights could be more green.	None Specified	This is a detailed matter that will be assessed through transport assessment work carried out when an application is submitted.
PS001	PS001/04	Mr G Pullin			No	Not specified	Not specified	Not specified		3		Keen that villages remain vibrant which can only occur if there is an adequate mix of houses that are truly affordable for young people. Cycling in rural areas is dangerous- there needs to be cycle ways along the A361 and A45 (at Daventry)	None Specified	There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy. Policy ST1 supports opportunities to promote and improve walking and cycling routes
PS001	PS001/05	Mr G Pullin			No	Not specified	Not specified	Not specified		5		Respecting quality of tranquilly shouldn't be at cost of having no children in villages, they need to play.	None Specified	The policy approach is considered to be effective and positive, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS002	N/A	Dominic Kramer			Not Specified	N/A	N/A	N/A				Contact details only		
PS003	N/A	Julie Wong	Equality & Human Rights Commission		Not Specified	N/A	N/A	N/A				No comments provided		
PS004	PS004/01	Neil Jarvis	Forestry Commission		No	Not specified	Not specified	Not Sound		9		There are at least two significant ancient woodlands in the District, Badby Wood and Nobottle Wood.  It is government policy to refuse development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland unless there are wholly exceptional reasons and a suitable compensatory strategy exists (ref para 175 of NPPF 18). Natural England and Forestry Commission have produced standing advice and an assessment guide.  Decision making process referenced in terms of Forestry Commission's input.		This issue is addressed through policy BN3 of the WNJCS.
PS005	PS005/01	Simon Barber	English Regional Transport Association		No	Legally Compliant	Compliant	Not Sound		8		ERTA don't agree with the statement made by the Council in their response to the Emerging Draft consultation that made reference to the Council considering that a rail link to Daventry town or a station at Weedon/Daventry Parkway would be a strategic project that would not be a matter for the Part 2 plan to consider and that the Northamptonshire Local Transport Plan and its associated thematic strategies do not consider a new rail station at Daventry.	It is important to re-connect Daventry to our railway network, e.g. Light Rail or a station either at Weedon or the re-opened Great Central (as referred to elsewhere in the plan), or perhaps all three options. Developments in regard to DIRFT are also important.	Such a rail link would be a strategic matter that would not be for a part 2 plan to consider. A Local Development Scheme for the review of the WNJCS has been adopted. It is not for the part 2 plan or this Council to amend the Northamptonshire Local Transport Plan.
PS006	PS006/01	Mr G Walter			No	Legally Compliant	Not specified	Not Sound		5RA2		Staverton is classed as the same as Braunston and Byfield despite a much smaller population and less facilities. The village should be classified as an 'other village'	Change Staverton to 'other village' on the settlement hierarchy.	The settlement hierarchy methodology set out in the Settlement Hierarchy Background Paper (GEN5) was informed by bespoke consultation in September 2016. The two stage approach is considered to strike an appropriate balance between qualitative and quantitative factors that takes into account the range of factors set out in criteria 1-10 of policy R1 of the WNJCS. It is therefore a robust approach to



													As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area Study (LAN1-4) was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.
													The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (set out on page 105 of the Plan). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study (LAN1-4).
													Whilst the area to the west and south west of Brixworth meets some of the criteria and enables the wider SLA to the west to be appreciated, it is not considered to contain sufficient special qualities to distinguish it from the wider countryside. The Special Landscape Area Study (LAN1-4) and subsequent additional work undertaken by the Council's consultant identifies factors in this area which do not support its designation.
													The Council does not dispute the value the community attaches to the landscape and the Brixworth NDP appropriately makes a local neighbourhood plan designation of 'High Sensitivity' landscape, which was based upon evidence base work that was undertaken for the neighbourhood plan. The Brixworth NDP forms part of the development plan, therefore the 'High Sensitivity' landscape designation will be given due weight in decision making. In response to representations on the Emerging Draft Plan, policy ENV1 was amended in the Proposed Submission Plan to make reference to suitably evidenced local landscape designations in neighbourhood plans. ENV1 also provides guidance that seeks to maintain the distinctive character and quality of the District's landscapes. The combination of these policies in the development plan will ensure that the quality of the landscape is taken into consideration.
PS011	PS011/02	Mrs D Daish			No	Legally Compliant	Not compliant	Not Sound	9ENV2		The neighbourhood development plan was carefully devised to agree with DDC plans. Local people have voted for what they would like in this area. We care about our countryside, particularly around the Brampton Valley Way and the area from there up to the village is very special.	Retain the SLA around Brixworth.	
PS012	PS012/01	Malcom Ball	Northants County Council Flood & Water		Not Specified	Not specified	Not specified	Not specified			Refer to previous response at emerging draft stage - wish to commend authors for recognition of floodrisk management policies and practices and role floodrisk management undertakes in development of sustainable places by reducing flood risk. Welcome inclusion of section 9.8.	No comment	Comments welcomed
PS013	PS013/01	Mrs DJS & Mrs SE Wilson			Not Specified	Not specified	Not specified	Not specified	5RA2		Object to the classification of Badby as a secondary service village as do not agree with the weight attached to the quantitative assessment in terms of a limited bus service and its proximity to Daventry town centre. Too little weight is attached to the qualitative assessment and the character, role and distinctiveness of Badby Village. Considers Badby can sustainably support as much new development that can be contained within its confines when consideration given to the topography, and the importance of the scenic, natural and historic quality of the adjoining countryside.	Reassessment of the classification of Badby from a secondary service village to an 'other village'	The settlement hierarchy methodology set out in the Settlement Hierarchy Background Paper (GEN5) was informed by bespoke consultation in September 2016. The two stage approach is considered to strike an appropriate balance between qualitative and quantitative factors that takes into account the range of factors set out in criteria 1-10 of policy R1 of the WNJCS. It is therefore a robust approach to establishing the hierarchy.
PS013	PS013/02	Mrs DJS & Mrs SE Wilson			Not Specified	Not specified	Not specified	Not specified	6HO1		Area to the South of HO1 provides a positive rural backdrop to the Town which provides an important buffer that safeguards the sense of rural remoteness in the wider countryside. Development of HO1 should therefore respect the rural character if this part of the site and the Southern and eastern edges of the site, including land near the A361 must be treated sensitively.	Not specified	Policy HO1 includes specific criteria to ensure the impact on the local landscape is sufficiently mitigated.
PS014	PS014/01	Rhys Bradshaw	Howkins and Harrison	Messrs Dennet, Hodges, Wagstaffe, Clutton & Hillier	Not Specified	Legally Compliant	Compliant	Sound	7EC9		No comment	No comment	No comment required
PS015	PS015/01	Mrs J Holliday			No	Not specified	Not specified	Not sound	5		Staverton should not be a secondary service village due to the limited facilities it now has including a limited bus service and the lack of shop, post office and the change of the farm shop to wedding venue. The village does not have two playing fields as described in the scoring.	Modify the plan to change Staverton to 'Other Village' on the settlement hierarchy.	The settlement hierarchy methodology set out in the Settlement Hierarchy Background Paper (GEN5) was informed by bespoke consultation in September 2016. The two stage approach is considered to strike an appropriate balance between qualitative and quantitative factors that takes into account the range of factors set out in criteria 1-10 of policy R1 of the WNJCS. It is therefore a robust approach to establishing the hierarchy.





PS030	PS030/03	Steven Lucas	Lucas Land and Planning	Brendon Chase	Yes	Not specified	Not specified	Not Sound	5		Plan has little positive to say regarding majority of rural area. Lack of village health checks is unfortunate. Drawing of tight confines is a weakness of the plan should be seen in context of West Northamptonshire Unitary. Whole area part of Unitary not just subservient to the town. No need for part 2 plan, a new strategic plan is needed.	None Specified	The policy approach is considered to be effective and positive, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy. The part 2 plan is anticipated to be adopted before local government reorganisation. A Local Development Scheme for the review of the WNJCS (West Northamptonshire Strategic Plan) has been adopted.
PS030	PS030/04	Steven Lucas	Lucas Land and Planning	Brendon Chase	Yes	Not specified	Not specified	Not Sound	6		Full rigour and clarity needed on housing allocations- sites have not delivered – needs to be considered in context of emerging West Northants Unitary Authority. No demonstrable need for housing allocations HO1 and HO2. Draft allocation HO1 breaks logical defensible boundary into rolling unspoilt Special landscape area countryside.	None Specified	The additional housing helps to meet the housing requirements and deliver the over-arching spatial set out in the WNJCS. The supporting text to each allocation alongside the Site Selection Background Paper (GEN6) and the sustainability appraisal (PSD2-1) confirms that they are the most sustainable options. Furthermore section 6 of the Housing Background Paper (HOU1) sets out how and when the allocations, and Daventry North East are anticipated to come forward in the plan period. The same information for further commitments is set out in the Housing Land Availability report (HOU7). This confirms that the plan is positively prepared, justified and effective in that there are sufficient sites that will come forward at Daventry in the plan period to meet the requirements established in the WNJCS, consistent with the over-arching spatial strategy.
PS030	PS030/05	Steven Lucas	Lucas Land and Planning	Brendon Chase	Yes	Not specified	Not specified	Not Sound	7		Plan has little positive to say regarding majority of rural area. Lack of village health checks is unfortunate. Drawing of tight confines is a weakness of the plan should be seen in context of West Northamptonshire Unitary. Whole area part of Unitary not just subservient to the town. No need for part 2 plan a new strategic plan is needed.	None Specified	A Local Development Scheme for the review of the WNJCS (west Northamptonshire Strategic Plan) has been adopted.
PS031	PS031/01	Steven Lucas	Lucas Land and Planning	Althorp Estate	Yes	Not specified	Not specified	Not Sound	2		The role of Daventry town as subservient to Northampton needs full acknowledgement and particularly fundamental in light of reorganisation to unitary authority. This aspect of changing political geography and administration of Northamptonshire must be noted and there is no evidence in this plan that this has occurred.	The plan should consider the wider strategic implications for the emergent West Northamptonshire Plan as an integral part of the new Unitary Authority.	This is a part 2 plan. The WNJCS defines the hierarchy of towns in the West Northamptonshire area. The part 2 plan is anticipated to be adopted before local government reorganisation, should this occur. A Local Development Scheme for the review of the WNJCS has been adopted.
PS031	PS031/02	Steven Lucas	Lucas Land and Planning	Althorp Estate	Yes	Not specified	Not specified	Not Sound	4		West Northamptonshire Joint Core Strategy is 4 years old and due to be replaced. No mention of cross boundary plan making moving toward the West Northamptonshire unitary authority. The delivery of the future vision for Daventry town having a population of 40,000 is questionable.	This plan should consider the wider strategic implications for the emergent West Northamptonshire Plan as an integral part of the new Unitary Authority.	A Local Development Scheme for the review of the WNJCS (West Northamptonshire Strategic Plan) has been adopted.
PS031	PS031/03	Steven Lucas	Lucas Land and Planning	Althorp Estate	Yes	Not specified	Not specified	Not Sound	5		Focus on development at Daventry town is flawed as town has failed to reach targets – scheduled to reach population of 36,400 from 1966 to 1981 but today population approximately 26,500. Town sites not deliverable or sustainable. Need for villages to grow organically to sustain services – parish health checks required. Villages need to grow organically to sustain village facilities.	Plan is only about Daventry town not the wider rural area- need a comprehensive new West Northamptonshire Unitary Plan to consider planning across the whole area.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS031	PS031/04	Steven Lucas	Lucas Land and Planning	Althorp Estate	Yes	Not specified	Not specified	Not Sound	6		Full rigour and clarity needed on housing allocations- sites have not delivered – needs to be considered in context of emerging West Northants Unitary Authority. Clarity needed why additional housing needs to be provided in the town and why its outside the town boundary. Clarity also needs that they are available for development, development expectations, detail and timing. Figure 5 should show the allocations – misleading that aren't included. Where is evidence that 1,400 dwellings will come forward on Daventry North East. Table 4 – proposed allocations should be shown as proposed draft allocations. Information on pages 44-49 is confusing and unclear. Until clarity is provided object to allocations HO1 and HO2 – rural allocations outside the town.	None Specified	The additional housing helps to meet the housing requirements and deliver the over-arching spatial set out in the WNJCS. The supporting text to each allocation alongside the Site Selection Background Paper (GEN6) and the sustainability appraisal (PSD2-1) confirms that they are the most sustainable options. Furthermore section 6 of the Housing Background Paper (HOU1) sets out how and when the allocations and Daventry North East are anticipated to come forward in the plan period. The same information for further commitments is set out in the Housing Land Availability report (HOU7). This confirms that the plan is positively prepared, justified and effective in that there are sufficient sites that will come forward at Daventry in the plan period to meet the requirements established in the WNJCS, consistent with the over-arching spatial strategy.

PS031	PS031/05	Steven Lucas	Lucas Land and Planning	Althorp Estate	Yes	Not specified	Not specified	Not Sound	7		This chapter fails to consider the wider rural area and does not include reference to a vibrant rural economy. This emergent plan needs to consider the joint future planning of the wider area in conjunction with SNC and NBC.	This plan should consider the wider strategic implications for the emergent West Northamptonshire Plan as an integral part of the new Unitary Authority.	A Local Development Scheme for the review of the WNJCS (West Northamptonshire Strategic Plan) has been adopted. This plan will review the wider strategic needs for the area.
PS031	PS031/06	Steven Lucas	Lucas Land and Planning	Althorp Estate	Yes	Not specified	Not specified	Not Sound	8	Policies Map	The North West Relief Road is a protected route and is not marked on proposals map 5. Construction of the road is expected to start in 2019 with completion in 2021-2022 and the plan should reflect this. Similarly the Daventry Development Link Flore-Weedon Bypass is not shown on any plan	This plan should consider the wider strategic implications for the emergent West Northamptonshire Plan as an integral part of the new Unitary Authority. Both routes and roads should be shown on the policies maps and noted in the plan text.	The North West Relief Road is not a protected route. A Local Development Scheme for the review of the WNJCS has been adopted. The Daventry Development Link Road is complete. Given that it is not therefore a proposal it does not have to form part of the plan. It will be added to the base mapping as and when it is updated by the ordnance survey.
PS031	PS031/07	Steven Lucas	Lucas Land and Planning	Althorp Estate	Yes	Not specified	Not specified	Not Sound	9		The District's landscape setting was ignored when making allocations HO1 and HO2 at Daventry. They are in the SLA and HO1 is framed by significant hills. The town's setting was not considered in sufficient detail before the town was endorsed in the WNJCS as a sub-regional centre. The consequence is that the town will expand beyond its administrative and natural boundaries leading to loss of areas of attractive countryside.  Need for a full review of the District's planning requirements, particularly the needs of the rural areas.	This plan or a West Northamptonshire unitary plan should consider the future planning roles of Daventry town and the rural areas of Daventry and South Northamptonshire Districts with the emerging regional importance of Northampton	The Site Selection Background Paper (GEN6) sets out the justification for the site allocations based on supporting evidence including landscape impact assessment. The site allocation policies include reference to landscape and visual impact assessments and mitigation where appropriate.  The WNJCS review (West Northamptonshire Strategic Plan) will include a spatial vision for West Northamptonshire, a spatial strategy for the distribution of development and the housing requirement. (Strategy Group report 13th September 2018)
PS031	PS031/08	Steven Lucas	Lucas Land and Planning	Althorp Estate	Yes	Not specified	Not specified	Not Sound	9	ENV3	Lack of logic to the Green Wedge annotations. It needs to be considered in the context of the emerging West Northants unitary authority and cross boundary working. Question whether the Green Wedges have been agreed with SNC and NBC, if not they should be. If applied, the annotations should integrate with future housing needs in West Northants, particularly around Northampton.  Policies Map 5 should show the projected line of the North West bypass. There is a lack of logic of the Green Wedge between Harlestone and Northampton. Open countryside, conservation area designations and protected woodland are sufficient protection.  Lack of notations and considerations regarding agricultural land quality is contrary to the NPPF.	None Specified	As set out in para 9.2.04 of the plan, the Green Wedge designation will be taken into account in the WNJCS review when options will be explored for further development in Daventry District to meet Northampton's needs. This aligns with the position taken in policy SP1 (B) that supports plan-led development to meet Northampton's needs. The Local Development Scheme for the review has been adopted by Daventry District Council, SNC and NBC. In the meantime, policy ENV3 does not preclude development taking place in the Green Wedge. However, it would need to demonstrate that it would maintain separation between and openness around settlements.  NBC has not objected to the Green Wedge designation. SNC have maintained an objection to the extent of the GW and assessment process. However, their position is that limited use of GW designations can be a useful tool to avoid coalescence. SNC (PS097/1) also considers that the Duty to Co-operate has been satisfied.  Para 9.2.03 acknowledges that the Green Wedge designation would not prejudice strategic infrastructure projects. However, the route of the North West Relief Road (Bypass) has not yet been fixed.  The Green Wedge designation serves a specific purpose that is distinct from the designations referred to.  The HELAA (HELAA2) and Sustainability Appraisal (PSD2-1) (objective 12 is "Soil, geology and land use) consider whether the sites put forward for consideration included Best and Most Versatile Agricultural Land (BMV). The Site Selection Background Paper (GEN6) takes all the evidence into account, explains the process and reasons for site selection.
PS032	PS032/01	Ben Ward	Persimmon Homes		Yes	Not specified	Not specified	Not Sound	6	HO8	Space standards unjustified and not consistent with national policy, insufficient evidence to support NDSS in Daventry i.e. two of ten fell short of meeting the internal space standards by more than 20%. Six properties fell short of meeting standard by 3% and 12% with two falling short by 16% and 17% respectively. Application of NDSS would suppress choice and competition in the market. Optional accessibility standard requirements not consistent with national policy as not sufficiently evidenced or justified.	Part D i), Diii) should be deleted in order for the plan to be sound.	As set out in the Housing Background Paper (HOU1) there is sufficient evidence to justify the application of the optional standards particularly regarding space standards in the context of the need for more 2 and 3 bedroom properties. Furthermore the Daventry Local Plan Part 2 Viability Assessment (GEN1) confirms that it would not make development unviable.

PS033	PS033/01	Mrs Anne Cowan	Maidwell with Draughton Parish Council	No	Legally Compliant	Compliant	Not Sound	5RA3	Justified – Designation of Maidwell as an ‘other village’. Residents and business have shown support for the village to grow to protect existing services. Both Maidwell School Hall and the Westaway Garage have not been identified as amenities or as having an employment role. Amendments to the assessment would result in Maidwell moving up the hierarchy to ‘Secondary Service Village’.	Modify the plan to change Maidwell with Draughton from ‘Other Village’ to ‘Secondary Service Village’ in the settlement hierarchy.	The settlement hierarchy methodology set out in the Settlement Hierarchy Background Paper (GEN5) was informed by bespoke consultation in September 2016. The two stage approach is considered to strike an appropriate balance between qualitative and quantitative factors that takes into account the range of factors set out in criteria 1-10 of policy R1 of the WNJCS. It is therefore a robust approach to establishing the hierarchy.
PS033	PS033/02	Mrs Anne Cowan	Maidwell with Draughton Parish Council	No	Legally Compliant	Compliant	Not Sound	9ENV2	Concerned about the reduction of the SLA from Draughton village to the Brampton Valley Way. Geology and topography change at the valley floor but the reduced area overlooks visual amenity value. This requires both sides of a valley to be respected and the western side cannot be maintained without the eastern side having the same status.  Support Brixworth Parish Council’s representation that the SLA west of Lamport and Hanging Houghton should be maintained for the same reason.  An additional area of limestone landscape north of Maidwell incorporating areas east of Kelmarsh to the District boundary has been overlooked. It provides a contrast to the ironstone topography and older buildings and boundaries are partly constructed from limestone.	Re-instate SLA to how it was before.  Categorise the limestone landscape as SLA.	As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area Study (LAN1-4) was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the district.  The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (set out on page 105 of the Plan). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study.  Criterion F of policy ENV1 supports identification of suitably evidenced local landscape designation in neighbourhood development plans, where justified against recognised guidance.
PS034	PS034/01	Douglas McNab	Department for Education	No	Not specified	Not specified	To be confirmed	6HO1	It is not clear if the plan is sound with regard to planning for education infrastructure as relevant evidence base has not been presented – i.e. the updated infrastructure schedule. Therefore it is not clear if plan is positively prepared based on strategy which seeks to meet objectively assessed education infrastructure requirements.  Policies HO1 and HO3 require 2FE primary schools on specific development sites, site allocations welcomed in principle but needs to be justified based on evidence of existing capacity and need.	Need to present updated infrastructure schedule.  As noted in previous representation, useful if site allocations clarified requirements for delivery of new schools include land required, preferred site characteristics and that development required to contribute land and construction costs for the new school.  Minor amendments would help ensure education infrastructure needed to support growth is delivery ensuring plan is effective.	The Infrastructure Delivery Schedule is being updated and will include costs and/or expected contributions to education.
PS034	PS034/02	Douglas McNab	Department for Education	No	Not specified	Not specified	To be confirmed	6HO3	It is not clear if the plan is sound with regard to planning for education infrastructure as relevant evidence base has not been presented – i.e. the updated infrastructure schedule. Therefore it is not clear if plan is positively prepared based on strategy which seeks to meet objectively assessed education infrastructure requirements.  Policies HO1 and HO3 require 2FE primary schools on specific development sites, site allocations welcomed in principle but needs to be justified based on evidence of existing capacity and need.	Need to present updated infrastructure schedule.  As noted in previous representation, useful if site allocations clarified requirements for delivery of new schools include land required, preferred site characteristics and that development required to contribute land and construction costs for the new school.  Minor amendments would help ensure education infrastructure needed to support growth is delivery ensuring plan is effective.	Policy HO3 is not an allocation. However, the Infrastructure Delivery Schedule is being updated and will include expected contributions to education from allocation HO2.

PS034	PS034/03	Douglas Mcnab	Department for Education		No	Not specified	To be confirmed			Appendix H - Infrastructure Delivery Schedule	<p>It is not clear if the plan is sound with regard to planning for education infrastructure as relevant evidence base has not been presented – i.e. the updated infrastructure schedule. Therefore it is not clear if plan is positively prepared based on strategy which seeks to meet objectively assessed education infrastructure requirements.</p> <p>Policies HO1 and HO3 require 2FE primary schools on specific development sites. Site allocations are welcomed on principle but need to be justified based on evidence of need and capacity.</p>	<p>Need to present updated infrastructure schedule.</p> <p>As noted in previous representation, useful if site allocations clarified requirements for delivery of new schools include land required, preferred site characteristics and that development required to contribute land and construction costs for the new school.</p> <p>Minor amendments would help ensure education infrastructure needed to support growth is delivery ensuring plan is effective</p>	<p>The Infrastructure Delivery Schedule (PSD9) is being updated and will include costs and/or expected contributions to education.</p>
PS035	PS035/02	Mr D Fielding			No	Not specified	Not sound	9ENV2		Declassification of the area to the west of Brixworth as a Special Landscape Area has not been explained or justified. It is illogical to declassify this area and retain SLA status for land on the other side of the Brampton Brook.	<p>Retain SLA for the land west of Brixworth.</p>	<p>As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area study was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.</p> <p>The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (set out on page 105 of the Plan). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study.</p> <p>Whilst the area to the west and south west of Brixworth meets some of the criteria and enables the wider SLA to the west to be appreciated, it is not considered to contain sufficient special qualities to distinguish it from the wider countryside. The Special Landscape Area Study and subsequent additional work undertaken by the Council's consultant identifies factors in this area which do not support its designation.</p> <p>The Council does not dispute the value the community attaches to the landscape and the Brixworth NDP appropriately makes a local neighbourhood plan designation of 'High Sensitivity' landscape, which was based upon evidence base work that was undertaken for the neighbourhood plan. The Brixworth NDP forms part of the development plan, therefore the 'High Sensitivity' landscape designation will be given due weight in decision making. In response to representations on the Emerging Draft Plan, policy ENV1 was amended in the Proposed Submission Plan to make reference to suitably evidenced local landscape designations in neighbourhood plans. ENV1 also provides guidance that seeks to maintain the distinctive character and quality of the District's landscapes. The combination of these policies in the development plan will ensure that the quality of the landscape is taken into consideration.</p>	
PS036	PS036/01	Mr J Jeyes			Yes	Not legally compliant	Not Sound	9ENV3		Plan is not in accordance with the Part 1 plan. As a result of examiners review of that plan, DDC's green buffer was removed, as there were sufficient policies in the plan that provided a robust rural areas policy framework.	<p>Green Wedge from Lower Harlestone, through Upper Harlestone, Church Brampton, Chapel Brampton, Boughton, Moulton, to Overstone should be removed.</p>	<p>The green wedge policy was not removed by the adoption of the WNJCS. If it had been, it would have been listed in Appendix 5 of that plan.</p> <p>It is a matter of planning judgement, as to whether or not the designation in the part 2 plan is justified by evidence, not a matter of law.</p>	



PS038	PS038/02	Gary Stephens	Marrons Planning	Hallam Land Management	Yes	Not specified	Not specified	Not Sound	5RA1		While plan is prepared 5 year land supply could come under strain, as currently proposed sites outside of settlement boundaries in primary service villages may only be deemed suitable if five year housing land supply cannot be demonstrated. Could lead to speculative development contrary to plan-led system. Identifying reserve sites would provide more certainty where growth would be directed in such circumstances. This would accord with policy SP1. Council has sufficient evidence to identify reserves sites around primary service villages, some such as Long Buckby are well placed to do this given sustainable transport links and location.	Identify Reserve Sites to come forward should the housing land supply identified in the plan falter.	Housing Implementation Strategy (HOU6) and the Housing Land Availability report (HOU7) sets out a 6.6. year housing supply (as at 1st April 2018) and how a 5 year land supply will be maintained for the foreseeable future.  There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy. Reserve sites are therefore not considered necessary.
PS039	PS039/01	Kate Thompson	Pegasus	Gallagher Estates & Davidsons	Yes	Legally Compliant	Compliant	Not Sound	4SP1		The plan is not positively prepared. It should make provision for delivering additional housing development on sites immediately adjoining the NRDA boundary. Housing delivery is stalling in the NRDA and NBC have calculated their 5 year housing land supply at 2.64 years in April 2017. The joint AMR identified housing delivery in the NRDA as a concern. Contingencies in the monitoring framework to the WNJCS include working with developers/landowners to develop viable and suitable schemes through the production of part 2 plans. SP1 (B) only seeks to assist with the delivery of 'plan-led' development to help meet Northampton's needs. It is not clear what this actually means or intends to achieve in order to support housing delivery for the town.	SP1 (B) should be replaced with a criteria-based policy against which future planning applications to meet Northampton's needs would be assessed. Proposed policy NRDA1 from the South Northants Part 2 Plan Preferred Options Consultation could form the basis of a similar policy in the Daventry Part 2 Plan.	The need to increase delivery for the NRDA is an important issue however given the scale of the shortfall (4,313 dwellings as at 1st April 2018) it is not considered to be a matter for this part 2 plan and needs to be considered at a strategic level through the planned review of the WNJCS. Criterion B of policy SP1 confirms that a plan-led approach will be supported to address this issue and the Council is committed to working with neighbouring authorities to review the WNJCS, through the preparation of a West Northamptonshire Strategic Plan. A Local Development Scheme for the review of the WNJCS has been adopted by Daventry District Council, SNC and NBC. SNC is not proposing to make any allocations to meet the needs of Northampton or include a criteria based policy for the NRDA in its part 2 plan and has not objected to this plan on Duty to Cooperate grounds. The trigger in the AMR has not been reached (as at 1st April 2018).
PS039	PS039/02	Kate Thompson	Pegasus	Gallagher Estates & Davidsons	Yes	Legally Compliant	Compliant	Not Sound	6HO8		Mix of market housing too prescriptive with percentage for proportion of bedroom sizes. Local level assessments for exception to this would be onerous and contrary to NPPF. Plan does not consider NPPF. Policy on dwellings should reflect demand not need. Evidence on housing mix and type for affordable and market does not provide how assessment has been undertaken to derive property size requirement figure, reference to Figure 32 of WNJ Planning Housing Market Evidence 2017 based on bedroom sizes. Unclear if assessment complete on existing housing stock. Housing Standards delivery higher than building regulations. Unexpected conclusion of 50% of all new dwellings should meet Lifetime Homes requirement. Lack of evidence for support of lifetime homes standards. Not justified evidence base. Application of standards would impact on viability. Space standards not substantiated and therefore not considered to be justified. Water efficiency evidence base does not demonstrate clear need for requirement over and above Building Regulations.	Housing Mix (for market) - Deletion or significant modification, addition of a word not sufficient. Would accept percentage figures for each dwelling size as target also identifying a more flexible range.	As set out in the Housing Background Paper (HOU1) there is sufficient evidence to justify the application of the optional standards particularly regarding space standards in the context of the need for more 2 and 3 bedroom properties. This helps to meet identified needs which accords with the NPPF particularly paragraph 50. Furthermore the Daventry Local Plan Part 2 Viability Assessment (GEN1) confirms that this policy would not make development unviable.  The policy provides sufficient certainty about what house mix will be required, based on the evidence, but allows for some flexibility as proposals will be required to "largely reflect" the required mix.
PS040	PS040/01	Mr N Moore			No	Not legally compliant	Not compliant	Not sound	5RA2		Boughton is classified as a Secondary Service Village despite very limited services, amenities and employment opportunities.		
PS040	PS040/03	Mr N Moore			No	Not legally compliant	Not Compliant	Not sound	5		Boughton is a small self-contained settlement which has extremely limited services and employment opportunities. These are more reflective of an 'Other Village' rather than a secondary service village.	Boughton to be reclassified as an 'Other Village' instead of a 'Secondary Service' Village.	The settlement hierarchy methodology set out in the Settlement Hierarchy Background Paper (GEN5) was informed by bespoke consultation in September 2016. The two stage approach is considered to strike an appropriate balance between qualitative and quantitative factors that takes into account the range of factors set out in criteria 1-10 of policy R1 of the WNJCS. It is therefore a robust approach to establishing the hierarchy.
PS041	PS041/01	Rhys Bradshaw	Howkins and Harrison	Messrs Russell & Wareing-Russell	Yes	Not specified	Not specified	Not Sound	1NP1		Support Council's approach to encourage neighbourhood development planning. However, criterion iii requires allocations in neighbourhood development plans to comply with criteria in the settlement hierarchy policies, which restrict development outside village boundaries. Neighbourhood development plans should be able to allocate housing growth outside boundaries and not be restricted to identifying development within the confines. Object to final sentence and request that it is omitted.	Delete wording "allocations should comply with the criteria set out in the relevant settlement hierarchy policies of the Local Plan".	The purpose of the policy is to assist groups in preparing neighbourhood development plans and the final sentence of criterion iii is considered necessary to provide clarity to groups that they will need to be in general conformity with the relevant settlement hierarchy policy. For settlements covered by policies RA1-RA3 this will allow allocations outside of the confines subject to certain 'exceptional circumstances' including where there is an identified need.
PS041	PS041/02	Rhys Bradshaw	Howkins and Harrison	Messrs Russell & Wareing-Russell	Yes	Not specified	Not specified	Not Sound	3	Vision and Objective 9	Vision does not sufficiently consider necessary growth implications for the rural area and does not sufficiently identify settlements in rural area where growth will be directed. Objective 9 restricts growth in the rural area.	Amend Vision and Objective 9 to consider necessary growth implications for the rural area and sufficient amount of growth for rural settlements.	Not considered appropriate for the vision to include growth implications for villages particularly as there is no outstanding need against the requirements in the WNJCS.

PS041	PS041/03	Rhys Bradshaw	Howkins and Harrison	Messrs Russell & Wareing-Russell	Yes	Not specified	Not specified	Not Sound	4SP1		The plan has not been positively prepared based on meeting current and future housing requirements. Acknowledge the WNJCS is the key driver to identifying the scale and distribution of housing development for West Northamptonshire but concerned that policy SP1 restricts necessary housing growth in Daventry District's rural area.	The policy and supporting text should be amended to consider the necessary growth implications for Daventry District's rural area.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be positively prepared in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS041	PS041/04	Rhys Bradshaw	Howkins and Harrison	Messrs Russell & Wareing-Russell	Yes	Not specified	Not specified	Not sound	5		Housing provision in WNJCS is based on an OAN fast approaching its sell by date, considered out of date by December 2019. Review of strategic policies should start now to ensure adoption by 2020. Approach taken to identifying additional housing growth at Daventry town and no housing at the District's rural area is not a positive approach to plan-making based on strategy which meets objectively assessed needs of WNJCS, not justified by robust evidence and inconsistent with the NPPF. Should take more positive approach identifying additional housing based on potential need from more up-to-date evidence underpinning preparation of review of WNJCS. Identify additional allocations in the rural area and specify amount of growth for individual settlements	Allocate additional housing in the District's rural area in LPP2. Smaller sites should be allocated for housing as they are more deliverable, can meet housing need in the short term and are not reliant on significant infrastructure in order for them to come forward.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy. A Local Development Scheme for the review of the WNJCS (West Northamptonshire Strategic Plan) has been adopted.
PS041	PS041/05	Rhys Bradshaw	Howkins and Harrison	Messrs Russell & Wareing-Russell	Yes	Not specified	Not specified	Not Sound	5RA1		Agree that Weedon performs function of Primary Service Village. Part 2 Plan should include provision for review of village confines to enable identification of land for residential development other than land identified in existing and emerging NDP's	Policy RA1 Primary Service Villages should be amended to consider the necessary growth	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS041	PS041/06	Rhys Bradshaw	Howkins and Harrison	Messrs Russell & Wareing-Russell	Yes	Not specified	Not specified	Not Sound	6		Housing provision in WNJCS is based on an OAN fast approaching its sell by date, considered out of date by December 2019. Review of strategic policies should start now to ensure adoption by 2020. Approach taken to identifying additional housing growth at Daventry town and no housing at the District's rural area is not a positive approach to plan-making based on strategy which meets objectively assessed needs of WNJCS, not justified by robust evidence and inconsistent with the NPPF. Should take more positive approach identifying additional housing based on potential need from more up-to-date evidence underpinning preparation of review of WNJCS. Identify additional allocations in the rural area and specify amount of growth for individual settlements	Allocate additional housing in the District's rural area in LPP2. Smaller sites should be allocated for housing as they are more deliverable, can meet housing need in the short term and are not reliant on significant infrastructure in order for them to come forward.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS042	PS042/01	Emilie Carr	Historic England			Not specified	Not specified	Not Sound	7EC9		There is a small section proposed of around 1ha (shown in full rep) immediately to the west of the Burnt Walls Scheduled Monument, harmful to the significance of the Scheduled Monument, the immediate setting and the historic landscape context of the monument, in which there is ridge and furrow.	The section of land described should be removed or criteria vii be amended to prevent development this area, such as:- <u>"Be sympathetically designed to mitigate the impact on the setting of Burnt Walls and Borough Hill Scheduled Monuments and the non-designated John of Gaunts Castle and Daventry Wood Farm; with no development in the hatched area shown in the heritage buffer area shown on the attached plan, the immediate setting of Burnt Walls scheduled monument."</u>	Whilst the concerns of HE are understood, it is considered that carefully designed development could be satisfactorily accommodated within the allocation. This is supported by the Heritage Impact Assessment (HER2). It is considered that this issue is satisfactorily addressed by a combination of EC9.vii. and ENV8 without the need for modification. Discussions will continue to be had with HE in the lead up to the examination. It is intended that a Statement of Common Ground will be prepared in readiness for the examination in order that the Inspector can more fully understand the up to date positions of both parties.



PS044	PS044/04	Kate Thompson	Pegasus	Gallagher Estates (Brockhall Road, Flore)	Yes	Legally Compliant	Compliant	Not Sound	5RA2		Approach to development in secondary services is unduly restrictive – opportunities for development in tightly drawn confines will be limited. Rural housing needs are unlikely to be met over the period to 2029. Support identification of Flore as a secondary service village but object to proposed strategy to make no further provision for growth in more sustainable rural villages over the plan period.	Should make provision for limited housing release in more sustainable settlements to address identified under-provision at Daventry town. More attractive to market and delivered effectively. Specific allocations should be made – site known as Land off Brockhall Road, Flore should be allocated, can deliver circa 200 dwellings.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS044	PS044/05	Kate Thompson	Pegasus	Gallagher Estates (Brockhall Road, Flore)	Yes	Legally Compliant	Compliant	Not Sound	6		Approach to addressing shortfall in delivery at Daventry town is insufficiently justified or effective. Has not considered reasonable alternatives as permitted by policy S6 of the WNJCS– in particular sites in the sustainable villages. To provide greater flexibility and mix of sites further provision should be made in sustainable rural communities, allocating sites in identified Primary and Secondary Services villages. More appropriate strategy than directing more development to the town to address the shortfall in delivery at the town.	Plan should make appropriate provision for further development in more sustainable rural communities to meet local housing needs and sustain local services and facilities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS044	PS044/06	Kate Thompson	Pegasus	Gallagher Estates (Brockhall Road, Flore)	Yes	Legally Compliant	Compliant	Not Sound	6HO8		Mix of market housing too prescriptive. Local level assessments for exceptions to this would be onerous. Plan does not consider NPPF, policy on dwellings should reflect demand (not need). Evidence on housing mix and type for affordable and market does not provide how assessment has been undertaken to derive property size requirement figure, reference to Figure 32 of WNJ Planning Housing Market Evidence 2017 based on bedroom sizes. Unclear if assessment complete on existing housing stock. Housing Standards delivery higher than building regulations. Unexpected conclusion of 50% to meet Lifetime Homes requirement. Lack of evidence to support lifetime homes standards therefore call for local assessment. Not considered that there is the available evidence to support Policy H08 in respect of accessibility standards, therefore plan not justified. Policies should address evidenced need and consider impact on viability, i.e. space standards should be based on a need to have basis, not enough to state standards unmet. Call for assessment re viability due to concern and to consider adverse effects on delivery rates of sites included in housing trajectory.	Deletion of policy or significant modification. More effective approach to set target percentages for each dwelling size whilst also identifying a more flexible housing mix range. Policy H08 to be applied flexibly allowing for particular circumstances for development sites amending policy to provide clarity that site specific circumstances will be taken into account for determining requirements. Deletion of proposed accessibility standards due to insufficient evidence.	As set out in the Housing Background Paper July 2018 (HOU1) there is sufficient evidence to justify the application of the optional standards particularly regarding space standards in the context of the need for more 2 and 3 bedroom properties. This helps to meet identified needs which accords with the NPPF particularly paragraph 50. Furthermore the Daventry Local Plan Part 2 Viability Assessment (GEN1) confirms that this policy would not make development unviable. The policy provides sufficient certainty about what house mix will be required, based on the evidence , but allows for some flexibility as proposals will be required to “largely reflect” the required mix.
PS045	PS045/01	Kate Thompson	Pegasus	Gallagher Estates (Moulton Lane, Boughton)	Yes	Legally Compliant	Compliant	Not sound		SA/HRA - Part 2	Sustainability Appraisal supporting the Submission Draft Plan is deficient in having not assessed the likely impacts of reasonable alternatives, including the provision of additional housing in the more sustainable rural communities. Given the shortfall of delivery at Daventry Town, as per Policy S6 WNJCS the Council should have considered a review of targets. Policy S6 sets a framework for actions to address delivery issues that is not limited to a review of the WNJCS. In concluding that it was not possible to consider alternative strategies, the Council has failed to properly consider reasonable alternatives and has failed to apply the principles for monitoring and review.	SA to be revised to consider appropriate reasonable alternatives, including the provision of additional development in rural communities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). In this context it is not considered that further allocations in the rural area should be assessed as a reasonable alternative (Section 2.1, Part 3A, SA). As detailed in Part 3A of the Sustainability Appraisal (PSD2-1), Reasonable alternatives (assessed both by policy and site allocations) have been undertaken and their conclusions are set out in Annex A and B of part 3A.
PS045	PS045/02	Kate Thompson	Pegasus	Gallagher Estates (Moulton Lane, Boughton)	Yes	Legally Compliant	Compliant	Not sound	3	Objective 9	No assurance that development to provide for local needs and support local services will be delivered in accordance with Objective 9. Plan is unsound as it is not effective in providing for a range of sites across the district to provide for the needs of all communities over the plan period.	To ensure objective 9 is met plan needs to make specific allocations in the rural areas.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.

PS045	PS045/03	Kate Thompson	Pegasus	Gallagher Estates (Moulton Lane, Boughton)	Yes	Legally Compliant	Compliant	Not sound	4SP1	<p>Not positively prepared or effective. There is not currently a 5-year supply of deliverable housing land in respect of the NRDA. Note that the Council consider a policy response is not required, instead suggesting the situation is kept under review. This approach is not sufficiently pro-active or effective in terms of ensuring Northampton's housing needs are met. To ensure development remains plan-led, this should be addressed within Part 2 Plans under the Duty to Cooperate.</p> <p>Given the shortfall in delivery at Daventry town, in accordance with Policy S6 of the WNJCS, the Council should have considered a review of targets, changes to the allocation of employment/housing and a review of policy. The framework of actions to address delivery in policy S6 is not limited to a review of the WNJCS itself. In concluding that it was not possible to consider alternative strategies, the Council has failed to properly consider reasonable alternatives and has failed to apply the principles for monitoring and review in policy S6.</p>	<p>To be considered sound, it is necessary for the plan to seek to address under-delivery in the NRDA. Additional land for housing should be allocated close to Northampton/adjoining the NRDA. Land South of Moulton Lane, Boughton promoted and could assist with the delivery of the Moulton park spur road. If the Council choose not to allocate additional sites to assist with the NRDA housing shortfall, the Part 2 Local Plan should at the very least include a positive, criteria-based policy to allow for appropriate development to come forward during the Plan period until the Part 1 plan is reviewed.</p>	<p>The need to increase delivery for the NRDA is an important issue however given the scale of the shortfall (4,313 dwellings as at 1st April 2018) it is not considered to be a matter for this part 2 plan and needs to be considered at a strategic level through the planned review of the WNJCS. Criterion B of policy SP1 confirms that a plan-led approach will be supported to address this issue and the Council is committed to working with neighbouring authorities to review the WNJCS, through the preparation of a West Northamptonshire Strategic Plan. A Local Development Scheme for the review of the WNJCS has been adopted by Daventry District Council, SNC and NBC.</p> <p>SNC is not proposing to make any allocations to meet the needs of Northampton or include a criteria based policy for the NRDA in its part 2 plan and has not objected to this plan on Duty to Cooperate grounds.</p> <p>The trigger in the AMR has not yet been reached (as at 1st April 2018). NRDA needs are a part 1 matter. These continue to be monitored against the monitoring framework. A Local Development Scheme for the review of the WNJCS (West Northamptonshire Strategic Plan) has been adopted.</p> <p>Additional allocations made in the part 2 plan address the shortfall in delivery at Daventry town and help to deliver the spatial strategy.</p>
PS045	PS045/04	Kate Thompson	Pegasus	Gallagher Estates (Moulton Lane, Boughton)	Yes	Legally Compliant	Compliant	Not sound	5RA2	<p>Approach to development in secondary services is unduly restrictive – opportunities for development in tightly drawn confines will be limited. Rural housing needs are unlikely to be met over the period to 2029. Settlement hierarchy criteria appear appropriate but don't make consideration of proximity of settlements/site opportunities to Northampton. Sustainability credentials should reflect proximity to Northampton and access to higher order range of services and facilities available. Policy RA2 is unjustified taking into account available evidence.</p>	<p>Settlement hierarchy should take into account proximity of settlements/site opportunities to Northampton – should be reflected in hierarchy.</p> <p>Allocation of site (Land South of Moulton lane, Boughton) would facilitate development in sustainable location adjacent to main urban area of Northampton, contributing to meeting Northampton's needs.</p>	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p> <p>The hierarchy methodology takes into account the frequency of bus services to surrounding towns.</p> <p>Exploring options for further development in Daventry District to meet Northampton's needs is a matter for the review of the Part 1 WNJCS A Local Development Scheme for the review of the WNJCS (West Northamptonshire Strategic Plan). has been adopted.</p>
PS045	PS045/05	Kate Thompson	Pegasus	Gallagher Estates (Moulton Lane, Boughton)	Yes	Legally Compliant	Compliant	Not sound	6	<p>Approach to addressing shortfall in delivery at Daventry town is insufficiently justified or effective. Has not considered reasonable alternatives as permitted by policy S6 of the WNJCS– in particular sites in the sustainable villages. To provide greater flexibility and mix of sites further provision should be made in sustainable rural communities, allocating sites in identified Primary and Secondary Services villages. More appropriate strategy than directing more development to the town to address the shortfall in delivery at the town.</p>	<p>Plan should make appropriate provision for further development in more sustainable rural communities to meet local housing needs and sustain local services and facilities.</p>	<p>As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.</p> <p>There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS045	PS045/06	Kate Thompson	Pegasus	Gallagher Estates (Moulton Lane, Boughton)	Yes	Legally Compliant	Compliant	Not sound	6HO8	<p>Mix of market housing too prescriptive. Local level assessments for exceptions to this would be onerous. Plan does not consider NPPF, policy on dwellings should reflect demand (not need).</p> <p>Evidence on housing mix and type for affordable and market does not provide how assessment has been undertaken to derive property size requirement figure, reference to Figure 32 of WNJ Planning Housing Market Evidence 2017 based on bedroom sizes. Unclear if assessment complete on existing housing stock.</p> <p>Housing Standards delivery higher than building regulations. Unexpected conclusion of 50% to meet Lifetime Homes requirement. Lack of evidence to support lifetime homes standards therefore call for local assessment. Not considered that there is the available evidence to support Policy H08 in respect of accessibility standards, therefore plan not justified.</p> <p>Policies should address evidenced need and consider impact on viability, i.e. space standards should be based on a need to have basis, not enough to state standards unmet. Call for assessment re viability due to concern and to consider adverse effects on delivery rates of sites included in housing trajectory.</p>	<p>Deletion of policy or significant modification. More effective approach to set target percentages for each dwelling size whilst also identifying a more flexible housing mix range.</p> <p>Policy H08 to be applied flexibly allowing for particular circumstances for development sites amending policy to provide clarity that site specific circumstances will be taken into account for determining requirements.</p> <p>Deletion of proposed accessibility standards due to insufficient evidence.</p>	<p>As set out in the Housing Background Paper July 2018 (HOU1) there is sufficient evidence to justify the application of the optional standards particularly regarding space standards in the context of the need for more 2 and 3 bedroom properties. This helps to meet identified needs which accords with the NPPF particularly paragraph 50. Furthermore the Daventry Local Plan Part 2 Viability Assessment (GEN1) confirms that this policy would not make development unviable.</p> <p>The policy provides sufficient certainty about what house mix will be required, based on the evidence , but allows for some flexibility as proposals will be required to "largely reflect" the required mix.</p>







PS055	PS055/01	Gareth Johns	Savills	Society of Merchant Venturers	Yes	Legally Compliant	Compliant	Not sound	5RA1		Policy mechanism for development outside the confines is too onerous and restrictive and will not deliver the aims of the policy, i.e. support spatial distribution and to maintain and enhance vitality of Primary Service Villages. Raise a number of concerns; unclear how housing needs survey will work and how often they will be updated, approach is biased towards first developer who submits – may not lead to most sustainable sites being delivered, assessment does not take into account aim to enhance and maintain roles of villages, more information on how and/or who will need to demonstrate that local service is under threat and how development will be delivered to support that service.	Policy should be amended to provide a more positive framework and to be more flexible to delivery of appropriate sites adjacent to settlement confines.  Policy should encourage NP's to identify additional development opportunities outside the confines to sustain or improve position in the hierarchy and support or enhance vitality of the village. Strongly recommend reserve sites are identified – SMV owns land off Northampton Road and Station Road at Brixworth, both sites identified as deliverable for a number of reasons.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.  Exploring options for further development in Daventry District to meet Northampton's needs is a matter for the review of the Part 1 WNJCS. A Local Development Scheme for the review of the WNJCS has been adopted. Para 5.1.05 explains how and when Housing Needs Surveys (HOU8) will be updated. Furthermore policy RA1 has criteria to ensure sites coming forward to meet identified need are sustainable.
PS056	PS056/01	Guy Longley	Pegasus	Davidsons Developments Ltd (Naseby)	Yes	Legally Compliant	Compliant	Not sound		SA/HRA	Sustainability Appraisal supporting the Submission Draft Plan is deficient in having not assessed the likely impacts of reasonable alternatives, including the provision of additional housing in the more sustainable rural communities. Given the shortfall of delivery at Daventry Town, as per Policy S6 WNJCS the Council should have considered a review of targets. Policy S6 sets a framework for actions to address delivery issues that is not limited to a review of the WNJCS. In concluding that it was not possible to consider alternative strategies, the Council has failed to properly consider reasonable alternatives and has failed to apply the principles for monitoring and review	SA to be revised to consider appropriate reasonable alternatives, including the provision of additional development in rural communities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). In this context it is not considered that further allocations in the rural area should be assessed as a reasonable alternative (Section 2.1, Part 3A, SA). As detailed in Part 3A of the Sustainability Appraisal (PSD2-1), Reasonable alternatives (assessed both by policy and site allocations) have been undertaken and their conclusions are set out in Annex A and B of part 3A.
PS056	PS056/02	Guy Longley	Pegasus	Davidsons Developments Ltd (Naseby)	Yes	Legally Compliant	Compliant	Not sound	3		As a result of the lack of allocations and reliance on windfalls in the rural area the plan will fail to ensure the delivery of sufficient housing in the rural communities to meet needs and as a result objective 9 will not be met. Plan is unsound as it is not effective in providing for a range of sites across the district to provide for the needs of all communities over the plan period.	To ensure objective 9 is met plan needs to make specific allocations in the rural areas.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS056	PS056/03	Guy Longley	Pegasus	Davidsons Developments Ltd (Naseby)	Yes	Legally Compliant	Compliant	Not sound	4	SP1	By proposing no further allocations within the rural part of the district means there is a real risk that the housing needs in the rural area over the plan period will not be provided for and some key services and facilities could be under threat. The constrained nature of identified settlement limits means the scope for further housing provision in these rural settlements through infill development will be limited.	The Plan needs to make appropriate provision for additional housing in the more sustainable rural settlements to ensure that rural housing needs are addressed over the plan period.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS056	PS056/04	Guy Longley	Pegasus	Davidsons Developments Ltd (Naseby)	Yes	Legally Compliant	Compliant	Sound	5		The identification of Naseby as a Secondary Service Village is supported as this appropriately reflects the sustainability of the community and the range of services and facilities and access to public transport available.	None sought.	Comments welcomed.
PS056	PS056/05	Guy Longley	Pegasus	Davidsons Developments Ltd (Naseby)	Yes	Legally Compliant	Compliant	Not sound	5	RA2	Approach only allowing development outside the confines in exceptional circumstances is unduly restrictive. Opportunities within confines will be limited which means rural housing needs unlikely to be met in period to 2029. Policy should make specific allocations to help address shortfalls in provision at Daventry town to ensure overall requirements are met and help to sustain rural services.	The Plan should make appropriate provision for further development in the more sustainable rural communities to meet local housing needs and sustain local services and facilities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.

PS056	PS056/06	Guy Longley	Pegasus	Davidsons Developments Ltd (Naseby)	Yes	Legally Compliant	Compliant	Not sound	6			Approach to addressing shortfall in delivery at Daventry town is insufficiently justified or effective. Has not considered reasonable alternatives as permitted by policy S6 of the WNJCS– in particular sites in the sustainable villages. To provide greater flexibility and mix of sites further provision should be made in sustainable rural communities, allocating sites in identified Primary and Secondary Services villages. More appropriate strategy than directing more development to the town to address the shortfall in delivery at the town.	Plan should make appropriate provision for further development in more sustainable rural communities to meet local housing needs and sustain local services and facilities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.  There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS056	PS056/07	Guy Longley	Pegasus	Davidsons Developments Ltd (Naseby)	Yes	Legally Compliant	Compliant	Not sound	6HO1			Raise concerns over approach to addressing identified shortfalls in housing delivery. Council has failed to consider reasonable alternatives to meeting identified shortfall.  Risk that Council's approach will mean overall requirement will not be met within the plan period, housing delivery has not exceeded 164 dpa since 2011 and the Daventry North East SUE is expected to delivery 200 dpa from 2023. Serious questions whether local housing market can sustain assumed build out rates with both SUE's delivering from 2023 of between 350 and 546 dpa. Part 2 plan should make provision for further development in more sustainable rural settlements to provide range and mix of sites to meet strategic housing requirement.	The Plan should make appropriate provision for further development in the more sustainable rural communities to meet local housing needs and sustain local services and facilities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.  There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS056	PS056/08	Guy Longley	Pegasus	Davidsons Developments Ltd (Naseby)	Yes	Legally Compliant	Compliant	Not sound	6HO8			Change to policy wording following previous stage does not address concerns relating to viability. Requirement for dwelling mix too prescriptive. Evidence base not robust. Policy should reflect demand (not need) in line with national policy. Evidence does not provide how assessment has been undertaken to derive housing mix percentages. Housing Standards delivery higher than building regulations. Lacking evidence to support higher standards required. Insufficient evidence to justify policy requirement in relation to housing standards and the application of space standards.	Deletion or amendment of Sub-clauses B) & C) to provide flexibility for housing sizes and sites. Deletion of housing standards requirements and requirement for National Space Standards as a minimum.	As set out in the Housing Background Paper July 2018 (HOU1) there is sufficient evidence to justify the application of the optional standards particularly regarding space standards in the context of the need for more 2 and 3 bedroom properties. This helps to meet identified needs which accords with the NPPF particularly paragraph 50. Furthermore the Daventry Local Plan Part 2 Viability Assessment (GEN1) confirms that this policy would not make development unviable.  The policy provides sufficient certainty about what house mix will be required, based on the evidence , but allows for some flexibility as proposals will be required to "largely reflect" the required mix.
PS057	PS057/01	Guy Longley	Pegasus	Davidsons Developments Ltd (Byfield)	Yes	Legally Compliant	Compliant	Not sound		SA/HRA		Sustainability Appraisal supporting the Submission Draft Plan is deficient in having not assessed the likely impacts of reasonable alternatives, including the provision of additional housing in the more sustainable rural communities.  Given the shortfall of delivery at Daventry Town, as per Policy S6 WNJCS the Council should have considered a review of targets. Policy S6 sets a framework for actions to address delivery issues that is not limited to a review of the WNJCS. In concluding that it was not possible to consider alternative strategies, the Council has failed to properly consider reasonable alternatives and has failed to apply the principles for monitoring and review	SA to be revised to consider appropriate reasonable alternatives, including the provision of additional development in rural communities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy.  There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). In this context it is not considered that further allocations in the rural area should be assessed as a reasonable alternative (Section 2.1, Part 3A, SA). As detailed in Part 3A of the Sustainability Appraisal (PSD2-1), Reasonable alternatives (assessed both by policy and site allocations) have been undertaken and their conclusions are set out in Annex A and B of part 3A.
PS057	PS057/02	Guy Longley	Pegasus	Davidsons Developments Ltd (Byfield)	Yes	Legally Compliant	Compliant	Not sound	3			As a result of the lack of allocations and reliance on windfalls in the rural area the plan will fail to ensure the delivery of sufficient housing in the rural communities to meet needs and as a result objective 9 will not be met. Plan is unsound as it is not effective in providing for a range of sites across the district to provide for the needs of all communities over the plan period.	To ensure objective 9 is met plan needs to make specific allocations in the rural areas.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS057	PS057/03	Guy Longley	Pegasus	Davidsons Developments Ltd (Byfield)	Yes	Legally Compliant	Compliant	Not sound	4SP1			By proposing no further allocations within the rural part of the district means there is a real risk that the housing needs in the rural area over the plan period will not be provided for and some key services and facilities could be under threat. The constrained nature of identified settlement limits means the scope for further housing provision in these rural settlements through infill development will be limited.	The Plan needs to make appropriate provision for additional housing in the more sustainable rural settlements to ensure that rural housing needs are addressed over the plan period.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.

PS057	PS057/04	Guy Longley	Pegasus	Davidsons Developments Ltd (Byfield)	Yes	Legally Compliant	Compliant	Not sound	5			For Byfield, the stage 1 quantitative assessment identifies the settlement as a Primary Service Village, but it is demoted to a Secondary Service Village through the second stage qualitative assessment on the basis of limited access to employment and the size of the settlement. It is considered that the quantitative analysis should be the primary consideration as this provides a clear and robust comparative appraisal of available services and facilities. The settlement hierarchy should be amended to identify Byfield as a Primary Service Village.	The settlement hierarchy should be amended to identify Byfield as a Primary Service Village	The settlement hierarchy methodology set out in the Settlement Hierarchy Background Paper (GEN5) was informed by bespoke consultation in September 2016. The two stage approach is considered to strike an appropriate balance between qualitative and quantitative factors that takes into account the range of factors set out in criteria 1-10 of policy R1 of the WNJCS. It is therefore a robust approach to establishing the hierarchy.
PS057	PS057/05	Guy Longley	Pegasus	Davidsons Developments Ltd (Byfield)	Yes	Legally Compliant	Compliant	Not sound	5RA1			Approach only allowing development outside the confines in exceptional circumstances is unduly restrictive. Opportunities within confines will be limited which means rural housing needs unlikely to be met in period to 2029. Policy should make specific allocations to help address shortfalls in provision at Daventry town to ensure overall requirements are met and help to sustain rural services.	The Plan should make appropriate provision for further development in the more sustainable rural communities to meet local housing needs and sustain local services and facilities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS057	PS057/06	Guy Longley	Pegasus	Davidsons Developments Ltd (Byfield)	Yes	Legally Compliant	Compliant	Not sound	5RA2			Approach only allowing development outside the confines in exceptional circumstances is unduly restrictive. Opportunities within confines will be limited which means rural housing needs unlikely to be met in period to 2029. Policy should make specific allocations to help address shortfalls in provision at Daventry Town to ensure overall requirements are met and help to sustain rural services. Davidsons has interests in land at Boddington Road, Byfield. Provides sustainable option that should be allocated as part of revised strategy.	The Plan should make appropriate provision for further development in the more sustainable rural communities to meet local housing needs and sustain local services and facilities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS057	PS057/07	Guy Longley	Pegasus	Davidsons Developments Ltd (Byfield)	Yes	Legally Compliant	Compliant	Not sound	6			Approach to addressing shortfall in delivery at Daventry town is insufficiently justified or effective. Has not considered reasonable alternatives as permitted by policy S6 of the WNJCS– in particular sites in the sustainable villages. To provide greater flexibility and mix of sites further provision should be made in sustainable rural communities, allocating sites in identified Primary and Secondary Services villages. More appropriate strategy than directing more development to the town to address the shortfall in delivery at the town	Plan should make appropriate provision for further development in more sustainable rural communities to meet local housing needs and sustain local services and facilities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS057	PS057/08	Guy Longley	Pegasus	Davidsons Developments Ltd (Byfield)	Yes	Legally Compliant	Compliant	Not sound	6HO1			Raise concerns over approach to addressing identified shortfalls in housing delivery. Council has failed to consider reasonable alternatives to meeting identified shortfall. Risk that Council's approach will mean overall requirement will not be met within the plan period, housing delivery has not exceeded 164 dpa since 2011 and the Daventry North East SUE is expected to delivery 200 dpa from 2023. Serious questions whether local housing market can sustain assumed build out rates with both SUE's delivering from 2023 of between 350 and 546 dpa. Part 2 plan should make provision for further development in more sustainable rural settlements to provide range and mix of sites to meet strategic housing requirement.	The Plan should make appropriate provision for further development in the more sustainable rural communities to meet local housing needs and sustain local services and facilities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.

PS057	PS057/09	Guy Longley	Pegasus	Davidsons Developments Ltd (Byfield)	Yes	Legally Compliant	Compliant	Not sound	6HO8		Change to policy wording following previous stage does not address concerns relating to viability. Requirement for dwelling mix too prescriptive. Evidence base not robust. Policy should reflect demand (not need) in line with national policy. Evidence does not provide how assessment has been undertaken to derive housing mix percentages. Housing Standards delivery higher than building regulations. Lacking evidence to support higher standards required. Insufficient evidence to justify policy requirement in relation to housing standards and the application of space standards.	Deletion or amendment of Sub-clauses B) & C) to provide flexibility for housing sizes and sites. Deletion of housing standards requirements and requirement for National Space Standards as a minimum.	As set out in the Housing Background Paper July 2018 (HOU1) there is sufficient evidence to justify the application of the optional standards particularly regarding space standards in the context of the need for more 2 and 3 bedroom properties. This helps to meet identified needs which accords with the NPPF particularly paragraph 50. Furthermore the Daventry Local Plan Part 2 Viability Assessment (GEN1) confirms that this policy would not make development unviable.  The policy provides sufficient certainty about what house mix will be required, based on the evidence, but allows for some flexibility as proposals will be required to "largely reflect" the required mix.
PS058	PS058/01	Guy Longley	Pegasus	Miller Homes	Yes	Legally Compliant	Compliant	Not sound		SA/HRA	Sustainability Appraisal supporting the Submission Draft Plan is deficient in having not assessed the likely impacts of reasonable alternatives, including the provision of additional housing in the more sustainable rural communities. Given the shortfall of delivery at Daventry Town, as per Policy S6 WNJCS the Council should have considered a review of targets. Policy S6 sets a framework for actions to address delivery issues that is not limited to a review of the WNJCS. In concluding that it was not possible to consider alternative strategies, the Council has failed to properly consider reasonable alternatives and has failed to apply the principles for monitoring and review	SA to be revised to consider appropriate reasonable alternatives, including the provision of additional development in rural communities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). In this context it is not considered that further allocations in the rural area should be assessed as a reasonable alternative (Section 2.1, Part 3A, SA). As detailed in Part 3A of the Sustainability Appraisal (PSD2-1), Reasonable alternatives (assessed both by policy and site allocations) have been undertaken and their conclusions are set out in Annex A and B of part 3A.
PS058	PS058/02	Guy Longley	Pegasus	Miller Homes	Yes	Legally Compliant	Compliant	Not sound	3		As a result of the lack of allocations and reliance on windfalls in the rural area the plan will fail to ensure the delivery of sufficient housing in the rural communities to meet needs and as a result objective 9 will not be met. Plan is unsound as it is not effective in providing for a range of sites across the district to provide for the needs of all communities over the plan period.	To ensure objective 9 is met plan needs to make specific allocations	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs. There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS058	PS058/03	Guy Longley	Pegasus	Miller Homes	Yes	Legally Compliant	Compliant	Not sound	4	SP1	By proposing no further allocations within the rural part of the district means there is a real risk that the housing needs in the rural area over the plan period will not be provided for and some key services and facilities could be under threat. The constrained nature of identified settlement limits means the scope for further housing provision in these rural settlements through infill development will be limited.	The Plan needs to make appropriate provision for additional housing in the more sustainable rural settlements to ensure that rural housing needs are addressed over the plan period.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs. There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS058	PS058/04	Guy Longley	Pegasus	Miller Homes	Yes	Legally Compliant	Compliant	Sound	5		The identification of West Haddon as a Secondary Service Village is supported as this appropriately reflects the sustainability of the community and the range of services and facilities and access to public transport available.	None sought.	Comments welcomed.
PS058	PS058/05	Guy Longley	Pegasus	Miller Homes	Yes	Legally Compliant	Compliant	Not sound	5	RA1	Approach only allowing development outside the confines in exceptional circumstances is unduly restrictive. Opportunities within confines will be limited which means rural housing needs are unlikely to be met in period to 2029. Policy should make specific allocations to help address shortfalls in provision at Daventry town to ensure overall requirements are met and help to sustain rural services. Provision of smaller sites in rural settlements clearly attractive to market and can be delivered effectively.	The Plan should make appropriate provision for further development in the more sustainable rural communities to meet local housing needs and sustain local services and facilities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS058	PS058/06	Guy Longley	Pegasus	Miller Homes	Yes	Legally Compliant	Compliant	Not sound	5	RA2	Approach only allowing development outside the confines in exceptional circumstances is unduly restrictive. Opportunities within confines will be limited which means rural housing needs unlikely to be met in period to 2029. Policy should make specific allocations to help address shortfalls in provision at Daventry town to ensure overall requirements are met and help to sustain rural services. Provision of smaller sites in rural settlements clearly attractive to market and can be delivered effectively. Miller homes has interests in land at West Haddon. Provides sustainable option that should be allocated as part of revised strategy.	The Plan should make appropriate provision for further development in the more sustainable rural communities to meet local housing needs and sustain local services and facilities.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.

PS058	PS058/07	Guy Longley	Pegasus	Miller Homes	Yes	Legally Compliant	Compliant	Not sound	6		<p>Approach to addressing shortfall in delivery at Daventry town is insufficiently justified or effective. Has not considered reasonable alternatives as permitted by policy S6 of the WNJCS– in particular sites in the sustainable villages. To provide greater flexibility and mix of sites further provision should be made in sustainable rural communities, allocating sites in identified Primary and Secondary Services villages. More appropriate strategy than directing more development to the town to address the shortfall in delivery at the town</p>	<p>Plan should make appropriate provision for further development in more sustainable rural communities to meet local housing needs and sustain local services and facilities.</p>	<p>As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.</p> <p>There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy</p>
PS058	PS058/08	Guy Longley	Pegasus	Miller Homes	Yes	Legally Compliant	Compliant	Not sound	6HO1		<p>Raise concerns over approach to addressing identified shortfalls in housing delivery. Council has failed to consider reasonable alternatives to meeting identified shortfall.</p> <p>Risk that Council's approach will mean overall requirement will not be met within the plan period, housing delivery has not exceeded 164 dpa since 2011 and the Daventry North East SUE is expected to delivery 200 dpa from 2023. Serious questions whether local housing market can sustain assumed build out rates with both SUE's delivering from 2023 of between 350 and 546 dpa. Part 2 plan should make provision for further development in more sustainable rural settlements to provide range and mix of sites to meet strategic housing requirement.</p>	<p>The Plan should make appropriate provision for further development in the more sustainable rural communities to meet local housing needs and sustain local services and facilities.</p>	<p>As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1)and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.</p> <p>There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS058	PS058/09	Guy Longley	Pegasus	Miller Homes	Yes	Legally Compliant	Compliant	Not sound	6HO8		<p>Change to policy wording following previous stage does not address concerns relating to viability.</p> <p>Requirement for dwelling mix too prescriptive. Evidence base not robust. Policy should reflect demand (not need) in line with national policy. Evidence does not provide how assessment has been undertaken to derive housing mix percentages.</p> <p>Housing Standards delivery higher than building regulations. Lacking evidence to support higher standards required.</p> <p>Insufficient evidence to justify policy requirement in relation to housing standards and the application of space standards.</p>	<p>Deletion or amendment of Sub-clauses B) &amp; C)to provide flexibility for housing sizes and sites.</p> <p>Deletion of housing standards requirements and requirement for National Space Standards as a minimum.</p>	<p>As set out in the Housing Background Paper July 2018 (HOU1) there is sufficient evidence to justify the application of the optional standards particularly regarding space standards in the context of the need for more 2 and 3 bedroom properties. This helps to meet identified needs which accords with the NPPF particularly paragraph 50. Furthermore the Daventry Local Plan Part 2 Viability Assessment (GEN1) confirms that this policy would not make development unviable.</p> <p>The policy provides sufficient certainty about what house mix will be required, based on the evidence , but allows for some flexibility as proposals will be required to "largely reflect" the required mix.</p>
PS058	PS058/10	Guy Longley	Pegasus	Miller Homes	Yes	Legally Compliant	Compliant	Not sound	11PA1		<p>The approach to identifying LGS is not justified, not consistent with national policy and is unsound.</p> <p>The tests of soundness for a local plan are stricter than for the basic conditions that neighbourhood plans need to meet. It is therefore inappropriate for the Council to incorporate LGS identified in neighbourhood plans without a robust assessment of the designation in accordance with the NPPF and testing through the local plan. The LGS Assessment 2018 does not assess the LGSs in neighbourhood development plans.</p> <p>Land at West Haddon (Elizabeth Road) is identified as LGS in the neighbourhood plan. Proper assessment against the test of soundness and NPPF would conclude that the land does not merit LGS designation. Part of the justification in the NDP was inclusion of this site in the SLA, which is proposed to be removed in the Local Plan.</p> <p>Submission includes an assessment of land at West Haddon against NPPF tests. Conclusion is that it does not meet LGS designation requirements and should be deleted.</p>	<p>Council should undertake full assessment of LGS proposed through the Local Plan. Delete land at Elizabeth Road, West Haddon from proposals map.</p>	<p>The NPPF allows LGSs to be designated through local and neighbourhood plans and all LGS has to fulfil the criteria set out in para 77 of the NPPF.</p> <p>The West Haddon Neighbourhood Development Plan underwent public consultation under Regulations 14 and 16 of the Neighbourhood Planning (General) Regulations 2012. DDC considered all sites put forward for designation as LGS in the West Haddon neighbourhood plans to ensure they met the NPPF criteria. The independent examiner considered it against NPPF criteria which included a hearing session when the LGS at Elizabeth Road was specifically discussed.</p> <p>The Council is taking forward LGS designations in made neighbourhood development plans as these form part of the development plan and it is not appropriate to reconsider them once they are in made neighbourhood development plans.</p>
PS059	PS059/01	Guy Longley	Pegasus	Introcrowd	Yes	Legally Compliant	Compliant	Not sound	3		<p>As a Secondary Service Village it is acknowledged that Badby is a sustainable settlement that could meet needs for future housing and employment development. However without specific allocations a range of housing is not being provided and therefore policy RA2 does not contribute to the achievement of objective 9. The plan is therefore unsound as it is not effective.</p> <p>Introcrowd have an interest in land at Badby to accommodate approximately 25 dwellings.</p>	<p>To ensure objective 9 is met plan needs to make specific allocations</p>	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>



PS061	PS061/03	Sue Bridge	Sue Bridge Consulting	Zalissia Homes	Yes	Legally Compliant	Compliant	Not sound	5RA2		The approach is unduly restrictive which does not address the government's policy objectives of substantially increasing the supply of new homes as set out in the NPPF. Plan should make provision to meet the needs of both the urban and rural areas. In rural areas policies should be responsive to local circumstances and support development that reflects local needs. Tightly drawn confines and limited opportunities against policy RA2 mean rural housing needs or demand are unlikely to be met. Zalissia Country Homes Ltd has a site in Walgrave which is immediately adjacent to the existing built up area, is appropriate to the size of the village and is suitable and available for development.	Amend policy to make specific allocations to address shortfall in provision at Daventry town to ensure overall requirement is met, to help sustain local services.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS061	PS061/04	Sue Bridge	Sue Bridge Consulting	Zalissia Homes	Yes	Legally Compliant	Compliant	Not sound	5		Noted that Walgrave is categorised as one of the least sustainable villages in Secondary Service Village classification. Villagers have access to Post Office in the village on Thursdays which should be reflected in the scoring.	The background paper should recognise the full range of facilities available to the residents of Walgrave.	The settlement hierarchy only takes into account services and facilities that meet day to day needs in accordance with policy R1 of the WNJCS. The scoring within a hierarchy classification does not affect the application of the relevant policy.
PS061	PS061/05	Sue Bridge	Sue Bridge Consulting	Zalissia Homes	Yes	Legally Compliant	Compliant	Not sound	6	Map	Approach to the provision of four new allocations at Daventry Town has not been justified and will not address the shortfall in an effective manner. Too reliant on allocated sites coming forward and market being capable of delivering. Alternative, reasonable approaches have not been adequately considered including allocating sites for further development in the villages which would provide a mix and range of sites and give the plan flexibility and resilience.	The Plan should make provision for a range and mix of sites including some allocations in the rural villages.	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS062	PS062/01	Sue Green	Home Builders Federation		Yes	Not specified	Not specified	Not sound	4	SP1	The plan is not positively prepared, justified, effective or consistent with national policy. Policy SP1 Bullet Point (H) prioritises development on previously developed land (PDL) contrary to national policy.	The word "prioritising" should be deleted from Policy SP1 Bullet Point (H) because it is inconsistent with national policy.	Criterion H is consistent with policy S1 of WNJCS.
PS062	PS062/02	Sue Green	Home Builders Federation		Yes	Not specified	Not specified	Not sound	5	RA1	Council's spatial strategy should be as permissive as possible allowing development adjacent as well as within the confines to provide additional flexibility to overall housing land supply. Hierarchy and distribution should recognise difficulties facing rural communities such as acute housing supply and affordability issues. 2017 median house price to affordability ratio was 10.11. Distribution of housing should meet housing needs or urban and rural communities to accord with revised NPPF. Lack of flexibility in housing land supply makes the plan unsound.	None Specified	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS062	PS062/02	Sue Green	Home Builders Federation		Yes	Not specified	Not specified	Not sound	5	RA2	Council's spatial strategy should be as permissive as possible allowing development adjacent as well as within the confines to provide additional flexibility to overall housing land supply. Hierarchy and distribution should recognise difficulties facing rural communities such as acute housing supply and affordability issues. 2017 median house price to affordability ratio was 10.11. Distribution of housing should meet housing needs or urban and rural communities to accord with revised NPPF. Lack of flexibility in housing land supply makes the plan unsound.	None Specified	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS062	PS062/02	Sue Green	Home Builders Federation		Yes	Not specified	Not specified	Not sound	5	RA3	Council's spatial strategy should be as permissive as possible allowing development adjacent as well as within the confines to provide additional flexibility to overall housing land supply. Hierarchy and distribution should recognise difficulties facing rural communities such as acute housing supply and affordability issues. 2017 median house price to affordability ratio was 10.11. Distribution of housing should meet housing needs or urban and rural communities to accord with revised NPPF. Lack of flexibility in housing land supply makes the plan unsound.	None Specified	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.

PS062	PS062/02	Sue Green	Home Builders Federation		Yes	Not specified	Not specified	Not sound	5RA4		<p>Council's spatial strategy should be as permissive as possible allowing development adjacent as well as within the confines to provide additional flexibility to overall housing land supply.</p> <p>Hierarchy and distribution should recognise difficulties facing rural communities such as acute housing supply and affordability issues. 2017 median house price to affordability ratio was 10.11. Distribution of housing should meet housing needs or urban and rural communities to accord with revised NPPF.</p> <p>Lack of flexibility in housing land supply makes the plan unsound.</p>	None Specified	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS062	PS062/02	Sue Green	Home Builders Federation		Yes	Not specified	Not specified	Not sound	5RA5		<p>Council's spatial strategy should be as permissive as possible allowing development adjacent as well as within the confines to provide additional flexibility to overall housing land supply.</p> <p>Hierarchy and distribution should recognise difficulties facing rural communities such as acute housing supply and affordability issues. 2017 median house price to affordability ratio was 10.11. Distribution of housing should meet housing needs or urban and rural communities to accord with revised NPPF.</p> <p>Lack of flexibility in housing land supply makes the plan unsound.</p>	None Specified	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS062	PS062/02	Sue Green	Home Builders Federation		Yes	Not specified	Not specified	Not sound	5RA6		<p>Council's spatial strategy should be as permissive as possible allowing development adjacent as well as within the confines to provide additional flexibility to overall housing land supply.</p> <p>Hierarchy and distribution should recognise difficulties facing rural communities such as acute housing supply and affordability issues. 2017 median house price to affordability ratio was 10.11. Distribution of housing should meet housing needs or urban and rural communities to accord with revised NPPF.</p> <p>Lack of flexibility in housing land supply makes the plan unsound.</p>	None Specified	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS062	PS062/03	Sue Green	Home Builders Federation		Yes	Not specified	Not specified	Not sound	6HO1	Appendix J	<p>Flexibility contingency should be incorporated into Council's HLS to ensure it is responsive to changing circumstances and housing requirement in WNJCS is treated as a minimum rather than maximum ceiling.</p> <p>More flexibility needed when reliant on limited number of large sites, HBF suggest this should be 20% above requirements. Without this flexibility the plan is unsound.</p>	None specified	<p>As set out in the supporting text to the housing allocations, the Housing Background Paper(HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.</p> <p>There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS062	PS062/03	Sue Green	Home Builders Federation		Yes	Not specified	Not specified	Not sound	6HO2	Appendix J	<p>Flexibility contingency should be incorporated into Council's HLS to ensure it is responsive to changing circumstances and housing requirement in WNJCS is treated as a minimum rather than maximum ceiling.</p> <p>More flexibility needed when reliant on limited number of large sites, HBF suggest this should be 20% above requirements. Without this flexibility the plan is unsound.</p>	None specified	<p>As set out in the supporting text to the housing allocations, the Housing Background Paper(HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.</p> <p>There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS062	PS062/03	Sue Green	Home Builders Federation		Yes	Not specified	Not specified	Not sound	6HO4	Appendix J	<p>Flexibility contingency should be incorporated into Council's HLS to ensure it is responsive to changing circumstances and housing requirement in WNJCS is treated as a minimum rather than maximum ceiling.</p> <p>More flexibility needed when reliant on limited number of large sites, HBF suggest this should be 20% above requirements. Without this flexibility the plan is unsound.</p>	None specified	<p>As set out in the supporting text to the housing allocations, the Housing Background Paper(HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.</p> <p>There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>





PS068	PS068/01	Simon Andrews	DLA Town Planning	Ms Liz Sich	No	Not specified	Not specified	Not sound	4SP1		Development of the site at Pool Farm Field in Woodford Halse could deliver a flood alleviation project for the village. Promoters are currently working with NCC Flood and Water Management team and there is a lack of alternative sources of funding for the flood alleviation scheme. These specific circumstances merit the allocation of the site. While there is currently scope for development that yields environmental benefits to be brought forward outside of the Local Plan, it would nevertheless be better if such development could be plan-led and secured through the Local Plan.	The Local Plan should be amended to include the allocation of a site at Pool Farm Field in Woodford Halse on the basis of the specific flood alleviation benefits arising from the development.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy. Paragraph 5.2.19 identifies what would typically constitute exceptional circumstances. However this is not exclusive. If an application were to be submitted for this site it would be judged on its merits. Policy R1 is no longer proposed to be superseded.
PS068	PS068/02	Simon Andrews	DLA Town Planning	Ms Liz Sich	No	Not specified	Not specified	Not sound	5RA1		Flood alleviation project is needed in Woodford which can be delivered by development of Pool Farm Field. Policies such as RA1 should enable balancing of benefits and harm, policies that apply blanket restriction are inconsistent with government policy. Previously objected to previous iterations of RA1 as did not enable balancing exercise but it is better in this respect. Policy R1 sets out how additional development might be delivered. Whilst proposed to be superseded by RA1, does provide indication of type of exceptional circumstances which could be considered to be flood alleviation scheme.	The Local Plan should be amended to include the allocation of a site at Pool Farm Field in Woodford Halse on the basis of the specific flood alleviation benefits arising from the development.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy. Paragraph 5.2.19 identifies what would typically constitute exceptional circumstances. However this is not exclusive. If an application were to be submitted for this site it would be judged on its merits. Policy R1 is no longer proposed to be superseded.
PS069	PS069/02	Justin Gartland	Lichfields	Roundhill Northampton Ltd	Yes	Legally Compliant	Not compliant	Not sound	2		Duty to Cooperate Failure by Daventry District Council to update its Part 2 Plan to accommodate the Northampton housing shortfall, particularly in the face of representations by SNDC to that effect, suggests a failure to comply with the Duty to Cooperate. The proposed submission plan does not propose to assist in the rectification of this housing shortfall and is a major failure of the Plan to engage with the Duty to Co-operate. Not sound The plan is not positively prepared as it fails to address the requirement for additional sites for housing to meet the needs of Northampton. The five year housing land supply has been reviewed for Daventry and Northampton and the Council has been optimistic when anticipating the number of units to be delivered on SUE sites in the NRDA. NBC and SNC are proposing to allocate, or bring forward subject to criteria, additional land to meet this housing shortfall. DDC should follow a similar approach to SNC which allocates further sites in the Part 2 Plan in order to meet the overall housing need in Northampton.	The District needs to follow a similar approach to SNC and allocate further housing sites to meet Northampton's needs. Moulton Heights promoted for approx. 2500 dwellings, or which phase 1 (440 dwellings) could meet the short term 5-year housing land undersupply for Northampton.	The need to increase delivery for the NRDA is an important issue however given the scale of the shortfall (4,313 dwellings as at 1st April 2018) it is not considered to be a matter for this part 2 plan and needs to be considered at a strategic level through the planned review of the WNJCS. Criterion B of policy SP1 confirms that a plan-led approach will be supported to address this issue and the Council is committed to working with neighbouring authorities to review the WNJCS, through the preparation of a West Northamptonshire Strategic Plan. A Local Development Scheme for the review of the WNJCS has been adopted by Daventry District Council, SNC and NBC. SNC is not proposing to make any allocations to meet the needs of Northampton or include a criteria based policy for the NRDA in its part 2 plan and has not objected to this plan on Duty to Cooperate grounds.
PS069	PS069/03	Justin Gartland	Lichfields	Roundhill Northampton Ltd	Yes	Legally Compliant	Compliant	Not sound	8		The first phase of the Northampton Northern Orbital Route (NNOR) could be delivered as part of the proposed development of Moulton Heights. The plan has little regard to the NNOR when considering alternatives to the preferred options set out in the plan or consideration of the likely cumulative effects of the policies in the plan with other proposals.	The route of the NNOR should be indicated in the emerging Local Plan, the accompanying policies map and the accompanying Sustainability Appraisal.	Exploring options for further development in Daventry District to meet Northampton's needs is a matter for the review of the Part 1 WNJCS. A Local Development Scheme for the review of the WNJCS has been adopted. The County Council has not established justification for the road and does not have a fixed route. Therefore it is not possible to identify this in the plan. The plan already acknowledges the stage that the County Council has reached on proposals for the NNOR, but cannot say anything further at this stage.



PS072	PS072/03	Gregg Boyd	Iceni Projects	Roseneath Estates	Yes	Legally Compliant	Compliant	Not sound	5RA2		Dispute assertion that rural requirement has been met, should amend proposed wording of policy RA2 to ensure that this level is seen as a minimum – allowing flexibility to not restrict provision of sustainable, deliverable sites. Local plan should look towards wording of paragraph 6.16 of the WNJCS and not prevent appropriate development in rural areas from coming forward. Overly restrictive nature of policy RA2 is not in line with national policy and does not seek to boost significantly the supply of housing. Policy should be amended to reflect presumption in favour of sustainable development in order to ensure sustainable and deliverable development is approved without delay. Site at Teeton lane is considered deliverable and should be allocated.	Daventry Council should (a) consider whether any updated evidence regarding housing need in these locations changes the policy requirements of the Policy itself and (b) take account of the views of the local community, such as those being voiced by Creaton Parish Council – which are significant.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS072	PS072/04	Gregg Boyd	Iceni Projects	Roseneath Estates	Yes	Legally Compliant	Compliant	Not sound	5RA6		Amend policy to align with objectives of Local Plan vision and be consistent with the NPPF. Policy does not provide necessary level of flexibility on settlement edges and fails to support sustainable growth of villages. Misinterprets the NPPF by stating that the open countryside will be protected. Not justified, effective or consistent with national policy and is by no means positive planning set against 4 tests in the Framework (182) which point to need for more flexible approach to countryside	Need for a more flexible approach to Countryside development in the District	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.  Policy RA6 is considered to be consistent with the NPPF by recognising the intrinsic character and beauty of the countryside and alongside policies RA1-RA5 helps to support thriving rural communities.
PS073	PS073/01	Caroline Musker	Lichfields	Prologis and RRSLP	Yes	Legally Compliant	Compliant	Not sound	7EC10		Duty to Cooperate Support Council's efforts in the duty to cooperate. The Plan, plans positively for the future of the borough and addresses the economic need for the area. The allocation of DIRFT in the Part 2 Plan acknowledges the strategic importance of this site to Daventry as well as its national importance being a Nationally Significant Infrastructure Project. It is considered that the Plan reflects the findings of the Duty to Cooperate Background Paper (July 2018), and has been positively prepared in the context of the Framework [p182].  Not effective As worded the Policy restricts development at DIRFT to B8 uses which is not reflective of the Daventry International Rail Freight Interchange Alteration 2014 and the authorised development. This is unduly onerous and will impact on the deliverability of development.  Not consistent with National Policy As worded, Part (B) of the Policy is unclear in its reference to employment generating uses. Clarification is required as to whether this encompasses traditional Use Class B development, or commercial development which is employment generating.	Amend the wording of the Policy and reasoned justification to the following: Para 7.4.02 "Due to its location on the rail network and operation as a rail freight terminal of international significance, it is important that the site is retained for strategic B2/ B8 and ancillary office uses, i.e. those over 10,000sqm.....Opportunities for recreation space ancillary to the use of the wider development will be considered. ...." "A. Proposals for strategic B2 / B8 and ancillary B1 uses will be supported. D. For proposals within DIRFT 3, development will broadly reflect that of the Development Consent Order masterplan."	The suggestion that B2 should be included in the policy is not agreed, The Development Consent Order lists the uses that are acceptable on DIRFT 3 and the policy refers to this. To provide clarity to the policy two minor modifications are proposed. The first clarifies that a masterplan forms part of the DCO setting out how DIRFT 3 will be developed, and the second clarifies that development at DIRFT should reflect the terms of the Development Consent Order, not just the masterplan. Para 7.4.01. After final sentence insert "There is Masterplan for DIRFT 3, that is part of the Development Consent Order and indicates how the site will be developed" This change is identified as MiMd4 in the schedule of minor modifications. Part D. For proposals within DIRFT 3, development will reflect that of the Development Consent Order masterplan. This change is identified as MiMd5 in the schedule of minor modifications.
PS074	PS074/01	Ben Hall			No	Legally Compliant	Not specified	Not sound	5RA2	Creaton inset Map	Approach to defining confines at Creaton has been inconsistently applied to rear garden of property on Teeton lane which should be wholly included within the confines.	Amend the confines to include the curtilage of property in line with other settlement boundaries throughout the District.	The confines have been drawn in a manner consistent with the criteria in table 3 of the plan (page 37)
PS075	PS075/01	Roger Tustain	Nexus Planning	Stepnell Developments & Drayton Lodge	Yes	Legally Compliant	Compliant	Sound		SA/HRA	The SA concludes the Daventry South West site is one of the most appropriate locations for growth based on an assessment of reasonable alternatives. The site assessment in the SA attracts one double negative in respect of 'Soils, geology and land use' as the site is designated as a Mineral Safeguarding Area for Sand and Gravel. The SA sets out mitigation measures to undertake a further study to investigating the economic importance of the mineral reserve. If there is economically viable sand and gravel reserve on the site, this could be designed to recover, store and reuse as part of the construction.	Update mitigation measure for Daventry SW should be updated to reflect the fact any economically viable minerals present could potentially be used as part of the construction process via appropriate prior extraction.	It is considered appropriate to update the potential mitigation measures for the site assessment to reflect the latest available information. In this regard, a change has been included in the Minor Modifications Schedule (MiMd19).

PS075	PS075/02	Roger Tustain	Nexus Planning	Stepnell Developments & Drayton Lodge	Yes	Legally Compliant	Compliant	Sound	3		Support the vision set out through objectives 1-14. Policy HO1 Daventry South West assists in delivering the vision and each of the objectives.	None sought.	Comments welcomed.
PS075	PS075/03	Roger Tustain	Nexus Planning	Stepnell Developments & Drayton Lodge	Yes	Legally Compliant	Compliant	Sound	4SP1		Support Policy SP1, Daventry town is the main settlement in the District, the most sustainable settlement and therefore rightly a focus for growth to deliver its regeneration and re-inforce its role as the sub-regional centre of West Northamptonshire. This focus on Daventry town, aligns with the spatial strategy outlined within the adopted West Northamptonshire Joint Core Strategy (WNJCS), which is of particular relevance given the 'Part 2' nature of this Local Plan.	None sought.	Comments welcomed.
PS075	PS075/04	Roger Tustain	Nexus Planning	Stepnell Developments & Drayton Lodge	Yes	Legally Compliant	Compliant	Sound	6HO1		<p>Strong evidence supports the allocation of Daventry South West for a residential-led mixed use scheme. There are no known technical issues that would prevent the delivery of about 1100 dwellings on site. Daventry South West is available, deliverable and developable.</p> <p>Overall the site will deliver a number of significant benefits to the local community, Daventry Town and indeed that the District as a whole, including, but not limited to;</p> <ul style="list-style-type: none"> <li>-A new 2 form of entry primary school</li> <li>-At least 1100 dwellings (market and affordable)</li> <li>-Diverse mix of dwelling sizes, types and tenures</li> <li>-Green Infrastructure led design with access to significant areas of open space</li> <li>-New local centre</li> <li>-Improved connectivity with Daventry Town Centre for pedestrian and cyclists; and</li> <li>-new highways infrastructure including a new roundabout on the A45</li> </ul> <p>Site will be able to have its own character set within a high quality landscape led scheme which would in turn enhance the profile of Daventry, meeting a clear policy aspiration.</p>	<p>To assist with timely delivery of the allocation and help ensure site is comprehensively master planned and infrastructure costs equalised between landowners and appropriately phased, propose following additional criteria proposed;</p> <p>New Criteria D  <u>A comprehensive site wide masterplan to be will be submitted and agreed by the Council ahead of any planning application being taken to planning committee.</u></p> <p>New Criteria E  <u>A site wide Infrastructure Delivery Plan demonstrating how a phased development will support the cost of the associated infrastructure will be submitted as part of any planning application..</u></p>	<p>Comments welcomed.</p> <p>The inclusion of new criterion D is not considered to be required as this is already covered in part A of the policy which could be agreed when an application is determined.</p> <p>The minor modification to include the additional criteria for a site wide infrastructure delivery schedule is considered necessary to provide clarity about what a planning application will be expected to demonstrate. This change is identified as MiMd2 in the schedule of minor modifications.</p>
PS076	PS076/01	Nigel Ozier	Aitchison Rafferty	Brixworth Parish Council & Brixworth Neighbourhood Planning Steering Group	Yes	Legally Compliant	Compliant	Sound	1		<p>Not justified, effective or consistent in terms of references to the SLA at Brixworth.</p> <p>The original draft Local Plan has been revised but still concerned about the SLA boundary revision. Consultants engaged by the Parish Council (HBA) consider that there should be a precautionary approach to making changes where professional opinions differ. TEP has not made it clear how elements contribute to determine special qualities or distinctiveness. The proposed deletion of the SLA at Brixworth is not merited, it will reduce the level of protection which will lead to erosion and degradation of a valued landscape.</p> <p>Observations summarised as:</p> <ul style="list-style-type: none"> <li>• Photos show field sizes and intensification similar on both sides of Nene valley</li> <li>• Skyline of Brixworth is not urbanised</li> <li>• TEP commentary on original rep does not address concerns</li> <li>• Appeal decisions, neighbourhood plan examination and other independent consultants support its designation as SLA</li> </ul> <p>Details provided about dialogue with DDC including the tour of the parish to look at key views and subsequent meeting.</p> <p>Fundamental changes to landscape protection must be overwhelming supported by evidence, which is not the case here. No justification for removing SLA status on the eastern side of the Nene Valley around Brixworth.</p>	<p>Revise the SLA boundary to its original position.</p>	<p>As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area study was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.</p> <p>The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (set out on page 105 of the Plan). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study.</p> <p>Whilst the area to the west and south west of Brixworth meets some of the criteria and enables the wider SLA to the west to be appreciated, it is not considered to contain sufficient special qualities to distinguish it from the wider countryside. The Special Landscape Area Study (LAN1-4) and subsequent additional work undertaken by the Council's consultant identifies factors in this area which do not support its designation.</p> <p>The Council does not dispute the value the community attaches to the landscape and the Brixworth NDP appropriately makes a local neighbourhood plan designation of 'High Sensitivity' landscape, which was based upon evidence base work that was undertaken for the neighbourhood plan. The Brixworth NDP forms part of the development plan, therefore the 'High Sensitivity' landscape designation will be given due weight in decision making. In response to representations on the Emerging Draft Plan, policy ENV1 was amended in the Proposed Submission Plan to make reference to suitably</p>



PS076	PS076/03	Nigel Ozier	Aitchison Rafferty	Brixworth Parish Council & Brixworth Neighbourhood Planning Steering Group	Yes	Legally Compliant	Compliant	Not sound	4	<p>Not justified, effective or consistent in terms of references to the SLA at Brixworth.</p> <p>The original draft Local Plan has been revised but still concerned about the SLA boundary revision. Consultants engaged by the Parish Council (HBA) consider that there should be a precautionary approach to making changes where professional opinions differ. TEP has not made it clear how elements contribute to determine special qualities or distinctiveness. The proposed deletion of the SLA at Brixworth is not merited, it will reduce the level of protection which will lead to erosion and degradation of a valued landscape.</p> <p>Observations summarised as:</p> <ul style="list-style-type: none"> <li>• Photos show field sizes and intensification similar on both sides of Nene valley</li> <li>• Skyline of Brixworth is not urbanised</li> <li>• TEP commentary on original rep does not address concerns</li> <li>• Appeal decisions, neighbourhood plan examination and other independent consultants support its designation as SLA</li> </ul> <p>Details provided about dialogue with DDC including the tour of the parish to look at key views and subsequent meeting.</p> <p>Fundamental changes to landscape protection must be overwhelming supported by evidence, which is not the case here. No justification for removing SLA status on the eastern side of the Nene Valley around Brixworth.</p>	Revise SLA to its original position.	<p>As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area Study (LAN1-4) was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.</p> <p>The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (set out on page 105 of the Plan). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study (LAN1-4).</p> <p>Whilst the area to the west and south west of Brixworth meets some of the criteria and enables the wider SLA to the west to be appreciated, it is not considered to contain sufficient special qualities to distinguish it from the wider countryside. The Special Landscape Area Study (LAN1-4) and subsequent additional work undertaken by the Council's consultant identifies factors in this area which do not support its designation.</p> <p>The Council does not dispute the value the community attaches to the landscape and the Brixworth NDP appropriately makes a local neighbourhood plan designation of 'High Sensitivity' landscape, which was based upon evidence base work that was undertaken for the neighbourhood plan. The Brixworth NDP forms part of the development plan, therefore the 'High Sensitivity' landscape designation will be given due weight in decision making. In response to representations on the Emerging Draft Plan, policy ENV1 was amended in the Proposed Submission Plan to make reference to suitably evidenced local landscape designations in neighbourhood plans. ENV1 also provides guidance that seeks to maintain the distinctive character and quality of the District's landscapes. The combination of these policies in the development plan will ensure that the quality of the landscape is taken into consideration.</p>
PS076	PS076/04	Nigel Ozier	Aitchison Rafferty	Brixworth Parish Council & Brixworth Neighbourhood Planning Steering Group	Yes	Legally Compliant	Compliant	Not sound	4SP1	<p>Not justified, effective or consistent in terms of references to the SLA at Brixworth.</p> <p>The original draft Local Plan has been revised but still concerned about the SLA boundary revision. Consultants engaged by the Parish Council (HBA) consider that there should be a precautionary approach to making changes where professional opinions differ. TEP has not made it clear how elements contribute to determine special qualities or distinctiveness. The proposed deletion of the SLA at Brixworth is not merited, it will reduce the level of protection which will lead to erosion and degradation of a valued landscape.</p> <p>Observations summarised as:</p> <ul style="list-style-type: none"> <li>• Photos show field sizes and intensification similar on both sides of Nene valley</li> <li>• Skyline of Brixworth is not urbanised</li> <li>• TEP commentary on original rep does not address concerns</li> <li>• Appeal decisions, neighbourhood plan examination and other independent consultants support its designation as SLA</li> </ul> <p>Details provided about dialogue with DDC including the tour of the parish to look at key views and subsequent meeting.</p> <p>Fundamental changes to landscape protection must be overwhelming supported by evidence, which is not the case here. No justification for removing SLA status on the eastern side of the Nene Valley around Brixworth.</p>	Revise SLA to its original position.	<p>As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area Study (LAN1-4) was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.</p> <p>The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources. This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study (LAN1-4).</p> <p>Whilst the area to the west and south west of Brixworth meets some of the criteria and enables the wider SLA to the west to be appreciated, it is not considered to contain sufficient special qualities to distinguish it from the wider countryside. The Special Landscape Area Study (LAN1-4) and subsequent additional work undertaken by the Council's consultant identifies factors in this area which do not support its designation.</p> <p>The Council does not dispute the value the community attaches to the landscape and the Brixworth NDP appropriately makes a local neighbourhood plan designation of 'High Sensitivity' landscape, which was based upon evidence base work that was undertaken for the neighbourhood plan. The Brixworth NDP forms part of the development plan, therefore the 'High Sensitivity' landscape designation will be given due weight in decision making. In response to representations on the Emerging Draft Plan, policy ENV1 was amended in the Proposed Submission Plan to make reference to suitably evidenced local landscape designations in neighbourhood plans. ENV1 also provides guidance that seeks to maintain the distinctive character and quality of the District's landscapes. The combination of these policies in the development plan will ensure that the quality of the landscape is taken into consideration.</p>

PS076	PS076/05	Nigel Ozier	Aitchison Rafferty	Brixworth Parish Council & Brixworth Neighbourhood Planning Steering Group	Yes	Legally Compliant	Compliant	Not sound	5	<p>Not justified, effective or consistent in terms of references to the SLA at Brixworth.</p> <p>The original draft Local Plan has been revised but still concerned about the SLA boundary revision. Consultants engaged by the Parish Council (HBA) consider that there should be a precautionary approach to making changes where professional opinions differ. TEP has not made it clear how elements contribute to determine special qualities or distinctiveness. The proposed deletion of the SLA at Brixworth is not merited, it will reduce the level of protection which will lead to erosion and degradation of a valued landscape.</p> <p>Observations summarised as:</p> <ul style="list-style-type: none"> <li>• Photos show field sizes and intensification similar on both sides of Nene valley</li> <li>• Skyline of Brixworth is not urbanised</li> <li>• TEP commentary on original rep does not address concerns</li> <li>• Appeal decisions, neighbourhood plan examination and other independent consultants support its designation as SLA</li> </ul> <p>Details provided about dialogue with DDC including the tour of the parish to look at key views and subsequent meeting.</p> <p>Fundamental changes to landscape protection must be overwhelming supported by evidence, which is not the case here. No justification for removing SLA status on the eastern side of the Nene Valley around Brixworth.</p>	Reinstate the SLA to the eastern side of the Nene Valley around Brixworth	<p>As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area study was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.</p> <p>The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (set out on page 105 of the Plan). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study (LAN1-4).</p> <p>Whilst the area to the west and south west of Brixworth meets some of the criteria and enables the wider SLA to the west to be appreciated, it is not considered to contain sufficient special qualities to distinguish it from the wider countryside. The Special Landscape Area Study (LAN1-4) and subsequent additional work undertaken by the Council's consultant identifies factors in this area which do not support its designation.</p> <p>The Council does not dispute the value the community attaches to the landscape and the Brixworth NDP appropriately makes a local neighbourhood plan designation of 'High Sensitivity' landscape, which was based upon evidence base work that was undertaken for the neighbourhood plan. The Brixworth NDP forms part of the development plan, therefore the 'High Sensitivity' landscape designation will be given due weight in decision making. In response to representations on the Emerging Draft Plan, policy ENV1 was amended in the Proposed Submission Plan to make reference to suitably evidenced local landscape designations in neighbourhood plans. ENV1 also provides guidance that seeks to maintain the distinctive character and quality of the District's landscapes. The combination of these policies in the development plan will ensure that the quality of the landscape is taken into consideration. ENV1 also provides guidance that seeks to maintain the distinctive character and quality of the District's landscapes. The combination of these policies in the development plan will ensure that the quality of the landscape is taken into consideration.</p>
PS076	PS076/06	Nigel Ozier	Aitchison Rafferty	Brixworth Parish Council & Brixworth Neighbourhood Planning Steering Group	Yes	Legally Compliant	Compliant	Not sound	5RA1	<p>Not justified, effective or consistent in terms of references to the SLA at Brixworth.</p> <p>The original draft Local Plan has been revised but still concerned about the SLA boundary revision. Consultants engaged by the Parish Council (HBA) consider that there should be a precautionary approach to making changes where professional opinions differ. TEP has not made it clear how elements contribute to determine special qualities or distinctiveness. The proposed deletion of the SLA at Brixworth is not merited, it will reduce the level of protection which will lead to erosion and degradation of a valued landscape.</p> <p>Observations summarised as:</p> <ul style="list-style-type: none"> <li>• Photos show field sizes and intensification similar on both sides of Nene valley</li> <li>• Skyline of Brixworth is not urbanised</li> <li>• TEP commentary on original rep does not address concerns</li> <li>• Appeal decisions, neighbourhood plan examination and other independent consultants support its designation as SLA</li> </ul> <p>Details provided about dialogue with DDC including the tour of the parish to look at key views and subsequent meeting.</p> <p>Fundamental changes to landscape protection must be overwhelming supported by evidence, which is not the case here. No justification for removing SLA status on the eastern side of the Nene Valley around Brixworth.</p>	Reinstate the SLA to the eastern side of the Nene Valley around Brixworth	<p>As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area Study (LAN1-4) was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.</p> <p>The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (set out on page 105 of the Plan). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study.</p> <p>Whilst the area to the west and south west of Brixworth meets some of the criteria and enables the wider SLA to the west to be appreciated, it is not considered to contain sufficient special qualities to distinguish it from the wider countryside. The Special Landscape Area Study and subsequent additional work undertaken by the Council's consultant identifies factors in this area which do not support its designation.</p> <p>The Council does not dispute the value the community attaches to the landscape and the Brixworth NDP appropriately makes a local neighbourhood plan designation of 'High Sensitivity' landscape, which was based upon evidence base work that was undertaken for the neighbourhood plan. The Brixworth NDP forms part of the development plan, therefore the 'High Sensitivity' landscape designation will be given due weight in decision making. In response to representations on the Emerging Draft Plan, policy ENV1 was amended in the Proposed Submission Plan to make reference to suitably evidenced local landscape designations in neighbourhood plans. ENV1</p>





PS080	PS080/01	Val Coleby	Berrys	Vanderbilt Strategic	Yes	Not legally compliant	Not compliant	Not sound	4SP1	Map	<p>Promoting land at Overstone Farm.</p> <p>Not compliant with Duty to Cooperate DDC have issued a Duty to Cooperate Background Paper however this shows very little cooperation between the three authorities. Whilst DDC are following the procedure to engage with adjoining authorities and stakeholders on key issues including the NRDA, there is little cooperation or agreement evident.</p> <p>Not positively prepared Northampton's housing needs are not being met. DDC have failed to accept that delivery is a function of supply and in relation to the NRDA, the supply is heavily dependent on the delivery of SUE's. Smaller, more deliverable sites such as Overstone Farm will support housing delivery through the slow delivery of SUEs.</p> <p>Not justified Support the removal of the Overstone Farm site from the green wedge designation. Reference made to the site allowed on appeal at Welford Road and states that Overstone Farm bears similarities to this site. The continued designation of this site as open countryside is not justified nor the most appropriate strategy for the site. Redefining the NRDA boundary around Overstone Farm is not a strategic issue that should be reserved for the Core Strategy.</p> <p>Not effective The outcomes of joint working are not addressing the unmet housing need in the housing market area as a strategic priority. The Overstone Farm site with limited infrastructure requirements can easily be delivered within the plan period. The inclusion of the site within the NRDA would be entirely compliant with SP1(B).</p> <p>Not consistent with national policy Development at Overstone Farm would support the growth of Northampton as the main centre for employment, housing, retail, leisure and services. It would constitute sustainable development. The opportunities of the site to support unmet housing need in Northampton have been overlooked in the emerging plan.</p>	<p>The site should either: Be allocated as a development site as an extension to the SUE or a standalone allocation within the Part 2 Plan, or Encompassed within the NRDA boundary and excluded from the open countryside.</p>	<p>The Duty to Cooperate Background Paper (GEN3) sets out how the duty has been met. No objection to meeting the duty from any of the listed bodies. The need to increase delivery for the NRDA is an important issue however given the scale of the shortfall (4,313 dwellings as at 1st April 2018) it is not considered to be a matter for this part 2 plan and needs to be considered at a strategic level through the planned review of the WNJCS. Criterion B of policy SP1 confirms that a plan-led approach will be supported to address this issue and the Council is committed to working with neighbouring authorities to review the WNJCS, through the preparation of a West Northamptonshire Strategic Plan. A Local Development Scheme for the review of the WNJCS has been adopted by Daventry District Council, SNC and NBC. This review will ensure a plan led approach to meeting Northampton's needs that would not undermine the spatial strategy.</p>
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PS081	PS081/02	Val Coleby	Berrys	Mr & Mrs Sgoluppi	Yes	Legally compliant	Not compliant	Not sound	9ENV3	<p>The Green Wedge at the northern edge of Northampton is an unnecessary policy requirement, it is restrictive and prevents Northampton's expansion.</p> <p>Positively prepared NBC is not meeting its housing requirements, it is constrained by its administrative boundaries and physical features. Future areas for expansion are likely to be to the north, supported by recent road infrastructure investment.</p> <p>Housing delivery in some parts of the Green Wedge is reasonable and sustainable and this site is a highly sustainable location. DDC's approach for NBC households to wait for SUE delivery is uncaring and places over- reliance on large scale SUEs. The plan is not positively prepared or effective.</p> <p>Justified Green Wedge policy dates from the 1997 Local Plan. The emerging Part 2 Local Plan has revised the Green Wedge to account for the SUEs. Separation of settlements can be achieved through normal planning controls, there is no need to sterilise land on the edge of Northampton which is not of biodiversity value and in private ownership with no public access. The Local Plan is contrary to the Core Strategy which focuses development in and around Northampton.</p> <p>Effective Review of the Core Strategy is likely within a year of the Local Plan's adoption. The Green Wedge is a temporary policy and its effectiveness for the lifetime of the plan is questionable.</p> <p>Consistent with national policy NPPG is clear that the local plan should take local circumstances into account to respond to opportunities to achieve sustainable development. Land north of Northampton is sustainably located. The blanket preventative policy is inconsistent with national policy.</p>	Delete policy ENV3 or delete the designation north of Northampton	<p>As set out in para 9.2.04 of the plan, the Green Wedge designation will be taken into account in the WNJCS review when options will be explored for further development in Daventry District to meet Northampton's needs. This aligns with the position taken in policy SP1 (B) that supports plan-led development to meet Northampton's needs. The Local Development Scheme for the review has been adopted by Daventry District Council, SNC and NBC. In the meantime, policy ENV3 does not preclude development taking place in the Green Wedge. However, it would need to demonstrate that it would maintain separation between and openness around settlements.</p> <p>Para 9.2.03 acknowledges that the Green Wedge designation would not prejudice strategic infrastructure projects. However, the justification for and route of the Northampton Northern Orbital Road has not yet been established.</p> <p>The proposed Green Wedge designations are based on evidence in the 2017 Daventry District Landscape Study , which assessed specific land parcels on the edges of Daventry and Northampton. The study is considered to be robust and the approach in the plan is justified.</p>
PS082	PS082/01	Geoff Armstrong	Armstrong Rigg Planning Ltd	Manor Oak Homes	Yes	Legally compliant	Compliant	Not sound	4SP1	<p>Promoting Daventry South East for residential.</p> <p>Not positively prepared Policies do not seek to meet the areas objectively assessed needs as a result of negative inclusion of restrictive policies within the plan and a lack of suitable deliverable allocations. The Council are negating their duty to cooperate towards the needs of neighbouring authorities and it is clear that agreement will not be reached with SNC in respect of the current approach.</p> <p>Not effective Not effective in delivering the localised needs of Daventry town or contributing towards the wider needs of the NRDA. Drawing on comments provided by SNC at the previous consultation stage, the Part 2 Plan fails to effectively deal with cross-boundary strategic matters, rather deferring them to a later date.</p>	The intent of SP1 is supported however to be sound it must be supported by a number of additional complementary policies allocating sufficient sites across the District that will enable both the objectively assessed needs of Daventry and the wider needs of the NRDA to be met including Daventry South East.	<p>As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.</p> <p>There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The need to increase delivery for the NRDA is an important issue however given the scale of the shortfall (4,313 dwellings as at 1st April 2018) it is not considered to be a matter for this part 2 plan and needs to be considered at a strategic level through the planned review of the WNJCS. Criterion B of policy SP1 confirms that a plan-led approach will be supported to address this issue and the Council is committed to working with neighbouring authorities to review the WNJCS, through the preparation of a West Northamptonshire Strategic Plan. A Local Development Scheme for the review of the WNJCS has been adopted by Daventry District Council, SNC and NBC.</p> <p>SNC is not proposing to make any allocations to meet the needs of Northampton or include a criteria based policy for the NRDA in its part 2 plan and has not objected to this plan on Duty to Cooperate grounds.</p>

PS082	PS082/02	Geoff Armstrong	Armstrong Rigg Planning Ltd	Manor Oak Homes	Yes	Legally Compliant	Compliant	Not sound	6	Map	<p><b>Not Justified</b> Evidence submitted alongside client's main representation, and included with Enclosure 4 of the same, demonstrates that client's land could not reasonably be considered as anything other than available, suitable and achievable and therefore deliverable. Omission of land, capable of delivering 400 dwellings, lacks justification in light of vital contribution to local housing delivery. Comes into focus when existing shortfall from WNJCS allocations as the town and likely slower delivery of Daventry South West are both taken into account. Irrational that Council have sought to pursue comprehensive gateway extension at South East Daventry since 2006 but failed to grasp the very real opportunity to deliver this vision in the plan.</p> <p><b>Not Effective</b> As set out in response to spatial strategy - omission of clients land land means the response to meeting housing needs of Daventry is entirely ineffective. Conversely clients land offers entirely deliverable opportunity to make significant positive contribution towards not only housing supply at town but general themes of sustainability related to urban form, connectivity and relationship with a sensitively delivered supply of new homes adjacent to one of the Districts key employment sites.</p>	Inclusion of a specific policy H08 that allocates Daventry South East for residential development for around 400 homes.	The supporting text to each allocation alongside the Site Selection Background Paper (GEN6) and the sustainability appraisal (PSD2-1) confirms that they are the most sustainable options when considered against the alternatives. The land to the north of the A45 at Daventry South East (part of site ref 312) was assessed as one of a number of options for expansion of the town. This iterative process and the reasons for not selecting the site are set out in Site Selection Background Paper (GEN6) which includes an overview of the OPUN Design review (HOU2) process and the Sustainability Appraisal (PSD2-1). These particularly identify the landscape and heritage constraints of the site. The aspirations for improving the gateway to the town can be addressed through proposed allocation EC9.
PS082	PS082/03	Geoff Armstrong	Armstrong Rigg Planning Ltd	Manor Oak Homes	Yes	Legally compliant	Compliant	Not sound	7	EC9	<p>Promoting Daventry South East for residential.</p> <p><b>Not justified</b> The approach to the delivery of the employment land covered by Policy EC9 fails to take into account the wider opportunities offered the land promoted to deliver an entirely sustainable mixed-use urban extension to the town. Similarly, the approach fails to seize a compelling opportunity to deliver a cohesive 'gateway' to the town in line with the Council's long-standing ambition to do so set out in the Daventry Masterplan 2040. The strategy is perverse in that it conflicts entirely with the significant line of evidence produced by the Council associated with the delivery of the South East SUE, evidence that consistently confirms the benefits of such an extension to the town.</p>	Modifications to policy EC9 proposed in full in the representation. These request changes to acknowledge delivery of land to the north for residential use and the importance of respecting the form of such development, integration with it and the provision of highways infrastructure upgrades that could support both employment and proposed residential use.	The supporting text to each allocation alongside the Site Selection Background Paper (GEN6) and the sustainability appraisal (PSD2-1) confirms that they are the most sustainable options when considered against the alternatives. The land to the north of the A45 at Daventry South East (part of site ref 312) was assessed as one of a number of options for expansion of the town. This iterative process and the reasons for not selecting the site are set out in Site Selection Background Paper (GEN6) which includes an overview of the OPUN Design review (HOU2) process and the Sustainability Appraisal (PSD2-1). These particularly identify the landscape and heritage constraints of the site.
PS082	PS082/04	Geoff Armstrong	Armstrong Rigg Planning Ltd	Manor Oak Homes	Yes	Legally compliant	Compliant	Not sound	9	ENV8	<p>ENV8 does not set out a positive strategy for the conservation or enhancement of the Burnt Walls and Borough Hill Scheduled Monuments; or the open landscape and visual links between them. Policy contains criteria which conflict with one another, and preclude sustainable development through residential-led scheme to the east of the site.</p>	Remove criteria ii from ENV8 and reword criteria i as follows: i. Maintaining, and wherever possible enhancing, the open landscape and visual link between Borough Hill and Burnt Walls Scheduled Monuments.	It should be borne in mind that Burnt Walls and Borough Hill are scheduled monuments, which are amongst the most important and of the highest significance (para 132 NPPF 2012). As such, great weight should be attached to them.  Policy does set out a positive strategy in line with NPPF and Historic England Guidance GPA1 "The Historic Environment in Local Plans" through allocation EC9 which promotes positive economic and environmental outcomes for the South East Gateway through regeneration, including the surrounding area of Burnt Walls. Policy also promotes further understanding and interpretation of Burnt Walls.  Open visual link is integral to the relationship between Borough Hill and Burnt Walls. Enhancement must be met through means which do not compromise this.
PS083	PS083/01	Stephen Harris	Emery Planning	Grasmere Strategic Land (Northampton)	Yes	Legally compliant	Not compliant	Not sound	4	SP1	<p>Promoting land south of Boughton Road, Moulton</p> <p>In the absence of a meaningful start to a review of the WNJCS and the time for a review to take place, the Part 2 Plan cannot ignore such a significant shortfall in delivery at the NRDA and should include a policy enabling sites to come forward such as the approach taken by South Northants Council in their draft Part 2 plan.</p>	There should be a development management policy to provide a consistent policy approach across the WNJCS area to meet serious and persistent under delivery. This should consider that limited development at primary service villages in close proximity to Northampton should be encouraged. This would not be inconsistent with the development strategy as housing requirements are not maxima.	The need to increase delivery for the NRDA is an important issue however given the scale of the shortfall (4,313 dwellings as at 1st April 2018) it is not considered to be a matter for this part 2 plan and needs to be considered at a strategic level through the planned review of the WNJCS. Criterion B of policy SP1 confirms that a plan-led approach will be supported to address this issue and the Council is committed to working with neighbouring authorities to review the WNJCS, through the preparation of a West Northamptonshire Strategic Plan. A Local Development Scheme for the review of the WNJCS has been adopted by Daventry District Council, SNC and NBC. SNC is not proposing to make any allocations to meet the needs of Northampton or include a criteria based policy for the NRDA in its part 2 plan and has not objected to this plan on Duty to Cooperate grounds.

PS083	PS083/02	Stephen Harris	Emery Planning	Grasmere Strategic Land (Northampton)	Yes	Legally compliant	Not compliant	Not sound	5RA1	(Comments on Policy SP1 – included in this chapter as modification suggested to RA1) Object to the absence of a policy to meet Northampton’s needs through sites in or adjacent to the NRDA or in sustainable locations in close proximity, for example Moulton.	Amend policy RA1 to include a policy permitting development to meet the wider housing need in Northampton in specific villages	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy. Exploring options for further development in Daventry District to meet Northampton’s needs is a matter for the review of the Part 1 WNJCS. A Local Development Scheme for the review of the WNJCS has been adopted.
PS083	PS083/03	Stephen Harris	Emery Planning	Grasmere Strategic Land (Northampton)	Yes	Legally compliant	Not compliant	Not sound	9ENV3	The 1997 Green Wedge designation covered land west and south of Moulton and excluded parcels north of Northampton. The current proposed Green Wedge designation is different. Land east of client’s land has been removed due to allocation in the Moulton Neighbourhood Plan. Land to the north is within the settlement boundary due to Salisbury Landscapes site. Land north of Northampton that was Green Wedge is now designated as Green Wedge.  Northern and eastern boundaries of client’s site adjoin the new settlement boundary. If the site is required for development through the plan, a plan review or application its role as Green Wedge is not applicable because neither the western or southern edges of Moulton would be closer to Northampton. The site would logically round off the village.  With reference to the site’s HELAA assessment, it is no longer isolated and does not share an affinity with the countryside due to construction of Salisbury Landscapes site.  Client’s site is dealt with as part of the wider parcel in the Daventry Landscape Assessment. Changes to north and east of site show that excluding it from the Green Wedge would not result in Moulton becoming closer to Northampton.  Object to wording of part A.ii. The openness around settlements and their settings has no bearing on the status of gap between settlements.	Client’s site should be excluded from Green Wedge  Delete part A.ii	Purpose of GW is not just to prevent coalescence of villages with Northampton, it also prevents coalescence between villages. In this case Moulton with Boughton.  As set out in para 9.2.04 of the plan, the Green Wedge designation will be taken into account in the WNJCS review when options will be explored for further development in Daventry District to meet Northampton’s needs. This aligns with the position taken in policy SP1 (B) that supports plan-led development to meet Northampton’s needs. The Local Development Scheme for the review has been adopted by Daventry District Council, SNC and NBC. In the meantime, policy ENV3 does not preclude development taking place in the Green Wedge. However, it would need to demonstrate that it would maintain separation between and openness around settlements.  Para 9.2.03 acknowledges that the Green Wedge designation would not prejudice strategic infrastructure projects. However, the justification for and route of the Northampton Northern Orbital Road has not yet been established.  The proposed Green Wedge designations are based on evidence in the 2017 Daventry District Landscape Study , which assessed specific land parcels on the edges of Daventry and Northampton. The study is considered to be robust and the approach in the plan is justified.
PS084	PS084/02	Robert Love	Bidwells	Davidsons Developments Ltd (Yelvertoft)	Yes	Legally compliant	Not compliant	Not sound	1NP1	Support Council’s approach to encourage neighbourhood development planning. However, criterion iii requires allocations in neighbourhood development plans to comply with criteria in the settlement hierarchy policies, which restrict development outside village boundaries. Neighbourhood development plans should be able to allocate housing growth outside boundaries. Object to final sentence and request that it is omitted. In most cases there is little incentive for rural villages to allocate further residential growth in neighbourhood development plans because the Part 2 Plan does not make any rural allocations and the settlement boundaries are drawn very tightly. Residential development in the rural areas should not be reliant on neighbourhood development plans.	Remove final sentence of criterion iii.	The purpose of the policy is to assist groups in preparing neighbourhood development plans and the final sentence of criterion iii is considered necessary to provide clarity to groups that they will need to be in general conformity with the relevant settlement hierarchy policy. For settlements covered by policies RA1-RA3 this will allow allocations outside of the confines subject to certain ‘exceptional circumstances’ including where there is an identified need.  A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS084	PS084/03	Robert Love	Bidwells	Davidsons Developments Ltd (Yelvertoft)	Yes	Legally compliant	Not compliant	Not sound	3	Concerned that the vision does not sufficiently consider necessary growth implications for the District’s rural area and does not sufficiently identify the settlements in the rural area to which the amount of growth will be directed. Concerned that Objective 9 restricts growth in the rural area to ‘limited development’.	The vision and objective should be amended to consider the necessary growth implications for Daventry District’s rural area and the sufficient amount of growth for settlements in the rural area.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS084	PS084/04	Robert Love	Bidwells	Davidsons Developments Ltd (Yelvertoft)	Yes	Legally compliant	Not compliant	Not sound	4	The supporting text to policy SP1 is unsound as the plan has not been positively prepared based on meeting current and future housing requirements. Acknowledge that the WNJCS is the key driver to identifying the scale and distribution of housing development for West Northamptonshire including Daventry District. However, concerned that Policy SP1 of the LPP2 restricts necessary housing growth in Daventry District’s rural area.	The supporting text should be amended to consider the necessary growth implications for Daventry District’s rural area.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be positively prepared in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.

PS084	PS084/05	Robert Love	Bidwells	Davidsons Developments Ltd (Yelvertoft)	Yes	Legally compliant	Not compliant	Not sound	5		<p>Approach taken to identifying additional housing growth at Daventry and no housing in the rural area is not a positive approach to plan-making based on a strategy that seeks to meet objectively assessed need of the WNJCS, is not justified by a robust evidence base and is inconsistent with the NPPF requirements.</p> <p>Council should take more proactive approach to identifying additional housing in Part 2 Local Plan based on potential additional housing need from evidence base that will underpin review of the WNJCS- including identifying amount of growth for individual settlements. Provision of smaller sites that are more deliverable, can meet short term housing need and will enable Council to maintain 5 year land supply</p>	None Specified	<p>As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.</p> <p>There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p> <p>A Local Development Scheme for the review of the WNJCS (West Northamptonshire Strategic Plan) has been adopted and it will be the matter for a part 1 plan to establish the scale of housing to be provided and its overall distribution.</p>
PS084	PS084/06	Robert Love	Bidwells	Davidsons Developments Ltd (Yelvertoft)	Yes	Legally compliant	Not compliant	Not sound	5RA1		<p>Yelvertoft should be classified as a Primary Service Village, it is a sustainable village which comprises a number of local amenities and services including a primary school, local shop, post office, village hall, church, public house, publicly accessible TRANS and local bus services. Yelvertoft is also located in close to a wide range of amenities and services in Rugby and a significant number of employment opportunities at the Daventry International Rail Freight Terminal (DIRFT). These should be factored into the scoring which would give Yelvertoft a score of 88.</p> <p>Policy is therefore unjustified.</p>	Yelvertoft should be identified as Primary Service Village	<p>There is currently no bus service running in Yelvertoft as reflected in the Settlement Hierarchy Background Paper (GEN5).</p> <p>Strategic Employment Area only applies to villages where they are situated directly adjacent. Yelvertofts position in the hierarchy is appropriate based on the methodology.</p>
PS084	PS084/07	Robert Love	Bidwells	Davidsons Developments Ltd (Yelvertoft)	Yes	Legally compliant	Not compliant	Not sound	5RA2		<p>Objects to identification of Yelvertoft as Secondary Service Village as it should be a Primary Service Village</p>	Yelvertoft should be identified as Primary Service Village under policy RA1	<p>The settlement hierarchy methodology set out in the Settlement Hierarchy Background Paper (GEN5) was informed by bespoke consultation in September 2016. The two stage approach is considered to strike an appropriate balance between qualitative and quantitative factors that takes into account the range of factors set out in criteria 1-10 of policy R1 of the WNJCS. It is therefore a robust approach to establishing the hierarchy.</p>
PS084	PS084/08	Robert Love	Bidwells	Davidsons Developments Ltd (Yelvertoft)	Yes	Legally compliant	Not compliant	Not sound	6		<p>Object to approach to only allocating additional housing growth in Daventry town to meet the District's housing needs. Large scale allocations will be reliant on significant infrastructure. Not sustainable to identify additional housing growth over and above Daventry North East SUE.</p> <p>Should take alternative approach as Rushcliffe have done (plan recently submitted). The 2,360 is not a ceiling and Council could allocate further housing growth in Daventry rural areas.</p> <p>Current approach is not justified by a robust evidence base and is inconsistent with the requirements of the NPPF. Smaller sites in sustainable villages will come forward in the short term to help meet need and sustain rural amenities and services.</p>	None specified	<p>As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.</p> <p>There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS084	PS084/09	Robert Love	Bidwells	Davidsons Developments Ltd (Yelvertoft)	Yes	Legally compliant	Not compliant	Not sound	6HO8		<p>Detailed mix of dwellings too prescriptive could result in viability and delivery issues.</p> <p>Focus on local evidence narrow.</p> <p>Policy not flexible, unjustified (evidence) and inconsistent with national policy. Level proposed to Building Regulations should relate to identified need.</p> <p>Reference to Building Regs not required.</p>	Reference to detailed mix of housing types and sizes and reference to Building Regulations and other housing standards should be omitted. Percentage requirements should be targets.	<p>As set out in the Housing Background Paper July 2018 (HOU1) there is sufficient evidence to justify the application of the optional standards particularly regarding space standards in the context of the need for more 2 and 3 bedroom properties. This helps to meet identified needs which accords with the NPPF particularly paragraph 50. Furthermore the Daventry Local Plan Part 2 Viability Assessment (GEN1) confirms that this policy would not make development unviable.</p> <p>The policy provides sufficient certainty about what house mix will be required, based on the evidence, but allows for some flexibility as proposals will be required to "largely reflect" the required mix.</p>
PS084	PS084/10	Robert Love	Bidwells	Davidsons Developments Ltd (Yelvertoft)	Yes	Legally compliant	Not compliant	Not sound	4SP1		<p>Policy SP1 is unsound as the plan has not been positively prepared based on meeting current and future housing requirements. Acknowledge that the WNJCS is the key driver to identifying the scale and distribution of housing development for West Northamptonshire including Daventry District.</p> <p>However, concerned that Policy SP1 of the LPP2 restricts necessary housing growth in Daventry District's rural area.</p>	Policy SP1 should be amended to consider the necessary growth implications for Daventry District's rural area.	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs. There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be positively prepared in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>

PS085	PS085/01	Camillar Duckworth	Turleys	Moulton College	Yes	Not legally compliant	Not compliant	Not sound			Concerned about absence of engagement in relation to designation of Local Green Space to the allotments in Moulton, and proposed Green Wedge designation .	Remove unnecessary Green Wedge and Green Space designations, and for these to be identified for housing.	As set out in the Local Green Space Assessments LGS 93 (BNE2) is considered to meet the tests set out in the NPPF to qualify as Local Green Space.  There have been opportunities through consultation on the Emerging Draft and Proposed Submission versions of the plan for landowners to comment on proposed Local Green Spaces.  Exploring options for further development in Daventry District to meet Northampton's needs is a matter for the review of the Part 1 WNJCS. A Local Development Scheme for the review of the WNJCS has been adopted. Regarding Green Wedge, there is no requirement to consult directly with landowners regarding designations. The College had opportunities to comment to a specific question at Issues and Options Stage, and then the Emerging draft Plan in addition to the Proposed Submission Plan.
PS085	PS085/03	Camillar Duckworth	Turleys	Moulton College	Yes	Not legally compliant	Not compliant	Not sound	4SP1		Not compliant with Duty to Cooperate Support SNC's response to the emerging draft Part 2 plan that states DDC should support NBC in addressing the issue of housing supply within the NRDA through the inclusion of a criteria based policy until the Part 1 plan is reviewed or it is possible to demonstrate a 5 year housing land supply for the NRDA. The Duty to Cooperate background paper shows little cooperation between the West Northamptonshire authorities; with SNC criticising DDC's approach to the NRDA and housing supply, and the discussions with NBC identified as being 'ongoing'. There is no apparent joint working on key issues to ensure the creation of a positively prepared and justified strategy for the Part 2 plan. Not positively prepared The plan fails to help to provide for the housing needs of the adjoining Northampton Borough. The plan should seek to address under delivery in the NRDA, particularly given limited opportunities to increase supply in the NRDA. Not justified The Daventry Local Plan Part 2 provides an opportunity to deliver additional housing to address shortfall in delivery in the NRDA. Moulton is a sustainable settlement which is capable of accommodating additional housing. Whilst a wider approach to meeting NBC's housing needs is required. Where there are appropriate, sustainable, and readily available sites (such as Moulton College's adjoining land to the north of Moulton), in the short-term, these can help to meet the contribution to address NBC's housing shortfall. Effective The effectiveness of the Plan should confirm that the Plan is 'deliverable over its period and based on effective joint working on cross-boundary strategic priorities'. Concerns have been raised under the duty to cooperate regarding joint working between authorities. A number of smaller allocations to support the severe housing supply shortfall at Northampton, including land to the north of Moulton, would not be a strategic issue and could readily be accommodated in the emerging Part 2 Plan. The allocation of a number of additional small sites will not be of a scale to disrupt the delivery of allocated sites or jeopardise the strategy of the Plan. Not consistent with national policy Sustainable development is defined in the 2012 NPPF by three dimensions; economic, social and environmental. Development of land to the north of Moulton would constitute sustainable development and help support unmet housing need in NBC.	Allocation of land to the north of Moulton for residential development to help meet the NBC housing shortfall within a sustainable settlement.	The need to increase delivery for the NRDA is an important issue however given the scale of the shortfall (4,313 dwellings as at 1st April 2018) it is not considered to be a matter for this part 2 plan and needs to be considered at a strategic level through the planned review of the WNJCS. Criterion B of policy SP1 confirms that a plan-led approach will be supported to address this issue and the Council is committed to working with neighbouring authorities to review the WNJCS, through the preparation of a West Northamptonshire Strategic Plan. A Local Development Scheme for the review of the WNJCS has been adopted by Daventry District Council, SNC and NBC. SNC is not proposing to make any allocations to meet the needs of Northampton or include a criteria based policy for the NRDA in its part 2 plan and has not objected to this plan on Duty to Cooperate grounds.



PS087	PS087/05	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	2			The spatial portrait fails to recognise that there are sustainable settlements within the rural area or the requirement for planning policies to ensure that opportunities are provided for villages to thrive and grow. Wording related to availability of sustainable transport is negatively framed.	In relation to housing, it is important that the plan remains responsive to the needs of rural areas and careful consideration will therefore need to be given to the preparation of policies that enable a continual pipeline of sustainable development to come forward to meet the needs of residents over the remaining 12 years of the plan period.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy. Section 2.5 accurately reflects the current position in the District regarding transport
PS087	PS087/06	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	3			The spatial portrait fails to recognise that there are sustainable settlements within the rural area or the requirement for planning policies to ensure that opportunities are provided for villages to thrive and grow. Wording related to availability of sustainable transport is negatively framed.	In relation to housing, it is important that the plan remains responsive to the needs of rural areas and careful consideration will therefore need to be given to the preparation of policies that enable a continual pipeline of sustainable development to come forward to meet the needs of residents over the remaining 12 years of the plan period.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS087	PS087/07	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	4	SP1		Not positively prepared, justified, effective or consistent with national policy. The plan strategy does not include an effective mechanism for dealing with needs that are not being met in the NRDA. It is unclear as to how the strategy will protect and enhance existing services and facilities within the District's villages. The strategy is inconsistent with national policy relating to previously developed land.	The Plan must include sufficient flexibility over its lifetime. As a result of the current land supply position, there is an urgent and pressing need for the Plan to respond to the rapid change that has occurred since the examination of the WNJCS, by embracing a positive approach to meeting the needs of the NRDA.	The need to increase delivery for the NRDA is an important issue however given the scale of the shortfall (4,313 dwellings as at 1st April 2018) it is not considered to be a matter for this part 2 plan and needs to be considered at a strategic level through the planned review of the WNJCS. Criterion B of policy SP1 confirms that a plan-led approach will be supported to address this issue and the Council is committed to working with neighbouring authorities to review the WNJCS, through the preparation of a West Northamptonshire Strategic Plan. A Local Development Scheme for the review of the WNJCS has been adopted by Daventry District Council, SNC and NBC. Policy CW3 – 'Protecting local retail services and public houses' seeks to protect local services and facilities within the District's villages. Policies RA1 – RA3 within chapter 5 allow for development where a scheme is required to support an essential local service. Criterion H, dealing with previously developed land, is consistent with policy S1 of the WNJCS.
PS087	PS087/08	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	5			It is unclear as to how the strategy will protect and enhance existing services and facilities within the District's villages Plan is not positively prepared, justified, effective or consistent with national policy.	None Specified	The plan contains a positive approach to ensuring the services and facilities are protected. Policies RA1 – RA3 within chapter 5 allow for development where a scheme is required to support an essential local service. Policy CW3 – Protecting local retail services and public houses seeks to protect local services and facilities within the District's villages.
PS087	PS087/09	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	5			The approach to the settlement hierarchy and the confines does not allow for a rapid response to changing circumstances. It is unclear as to how the strategy will protect and enhance services and facilities within the District's villages. It is concerning that the plan relies on windfall opportunities to sustain services and facilities. Use of settlement boundaries to arbitrarily restrict sustainable development does not accord with the positive approach to growth required by the Framework. Plan is not positively prepared, justified, effective or consistent with national policy.	Criteria led approach should be introduced setting out circumstances in which sustainable extensions to the settlements would be appropriate.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.  The plan contains a positive approach to ensuring the services and facilities are protected. Policies RA1 – RA3 within chapter 5 allow for development where a scheme is required to support an essential local service. Policy CW3 – Protecting local retail services and public houses seeks to protect local services and facilities within the District's villages.

PS087	PS087/10	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	5RA1	<p>The plan does not provide justification for its approach towards meeting the specific needs of individual settlements. Further clarification needed on how exceptional circumstances would be triggered and needs of specific settlements determined and addressed.</p> <p>Approach is not justified or consistent with National Policy.</p> <p>Gladman have interest in sites at 'Land at Brington Road, Long Buckby, Land off New Street, Weedon, and Holly Lodge Drive (Northampton)</p>	None Specified	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p> <p>The plan contains a positive approach to ensuring the services and facilities are protected. Policies RA1 – RA3 within chapter 5 allow for development where a scheme is required to support an essential local service. Policy CW3 – Protecting local retail services and public houses seeks to protect local services and facilities within the District’s villages.</p>
PS087	PS087/10	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	5RA2	<p>The plan does not provide justification for its approach towards meeting the specific needs of individual settlements. Further clarification needed on how exceptional circumstances would be triggered and needs of specific settlements determined and addressed.</p> <p>Approach is not justified or consistent with National Policy.</p> <p>Gladman have interest in sites at 'Land at Brington Road, Long Buckby, Land off New Street, Weedon, and Holly Lodge Drive (Northampton)</p>	None Specified	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p> <p>The plan contains a positive approach to ensuring the services and facilities are protected. Policies RA1 – RA3 within chapter 5 allow for development where a scheme is required to support an essential local service. Policy CW3 – Protecting local retail services and public houses seeks to protect local services</p>
PS087	PS087/11	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	5RA6	<p>The policy goes beyond the scope of the Framework in terms of its approach to the protection of the countryside.</p> <p>It is not justified, effective or consistent with National Policy.</p>	None Specified	<p>Policy RA6 is considered to be consistent with the NPPF by recognising the intrinsic character and beauty of the countryside and alongside policies RA1-RA5 helps to support thriving rural communities.</p>
PS087	PS087/12	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	6HO8	<p>Flexible approach for identifying housing mix should be brought forward.</p> <p>Lack of justification.</p> <p>Requirement to demonstrate, through evidence, justification and rational for proposed percentage requirements.</p> <p>Understanding needs to be established for scale of specialist housing.</p>	Specific requirements need to be justified.	<p>As set out in the Housing Background Paper July 2018 (HOU1) there is sufficient evidence to justify the application of the optional standards particularly regarding space standards in the context of the need for more 2 and 3 bedroom properties. This helps to meet identified needs which accords with the NPPF particularly paragraph 50. Furthermore the Daventry Local Plan Part 2 Viability Assessment (GEN1) confirms that this policy would not make development unviable.</p> <p>The policy provides sufficient certainty about what house mix will be required, based on the evidence , but allows for some flexibility as proposals will be required to “largely reflect” the required mix.</p>
PS087	PS087/13	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	7EC4	<p>Not positively prepared, justified, effective or consistent with national policy.</p> <p>Employment policies should be suitably responsive to the needs of businesses over the plan period. The policy is not proactive enough and should seek to ensure that a vibrant economy is supported across both urban and rural areas.</p>	<p>It will be necessary to provide further flexibility through the wording of Policy EC4 to enable employment development to come forward where the need can be demonstrated (subject to wider sustainability considerations).</p>	<p>In the urban area of Daventry EC4 seeks to protect the Strategic Employment Areas that are all performing well. Allocations around Daventry provide opportunity for additional employment land to come forward to meet local demand. Allocations EC7 and EC9 include flexibility to meet needs of existing businesses.</p> <p>In the rural areas, WNJCS policy R2 includes criteria for a range of economic development that would be considered suitable including supporting the expansion of existing businesses in their existing locations.</p>
PS087	PS087/14	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	9ENV1	<p>Not justified, not consistent with national policy.</p> <p>The approach in criterion D to the consideration of landscape harm in the policy requires all landscape harm to be mitigated. This is inconsistent with national policy which does not set a general principle to refuse development where there is harm. Criteria based policies should give protection commensurate with status. Landscape is one factor to be considered and it is a balance of harm against benefits. Refusal should only be where harm is significant and demonstrably outweighs the benefits.</p> <p>Development can be located in gaps without leading to coalescence or loss of openness and character (Criterion A.iv).</p> <p>Questions how Council will consider cumulative impact under part B.</p> <p>Comments on Part F in terms of what type of evidence is required, the types of designations it refers to and how local designations will be considered.</p>	None specified	<p>Part D of the policy is a positive approach that requires landscape harm to mitigated. The policy is justified against the NPPF (2012).</p> <p>Specifically Core Planning Principles para 17 – 5th bullet point regarding recognising the intrinsic character and beauty of the countryside.</p> <p>Para 110 - aim to reduce pollution and other adverse effects on the local and natural environment.</p> <p>Para 156 – strategic policies including conservation &amp; enhancement of the natural and historic environment, including landscape.</p> <p>Para 157 - clear strategy for enhancing the natural, built &amp; historic environment</p> <p>NPPG confirms that NPPF para 17 covers wider countryside not just designated landscapes.</p> <p>Regarding criterion F the policy is clear that this would be a local designation and supporting text (para 9.1.06) confirms that this would need to be justified against recognised guidance.</p>

PS087	PS087/15	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	9ENV2		<p>Not justified, not consistent with national policy.</p> <p>Major concerns regarding identification and protection of extensive areas of countryside (41% of the District). This is contrary to national policy. NPPF para 113 indicates that criteria based policies should be used to consider proposals affecting landscape areas and that distinctions should be made between hierarchy of designations and their importance. Policy fails to include clear criteria and the special local landscape characteristics that the plan is seeking to manage.</p>	None specified	<p>As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area Study (LAN1-4) was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.</p> <p>This concluded that there was justification for retaining the SLAs with some boundary amendments. It is acknowledged that the designation is local and not a statutory/national one. The special qualities of each SLA area are set out in the Landscape Value Tables as stated in para 9.1.14 of the supporting text.</p> <p>The policy is justified against the NPPF (2012). NPPF Core Planning Principles para 17 – 5th bullet point regarding recognising the intrinsic character and beauty of the countryside. Para 109 refers to the protection of valued landscapes. Para 113 - criteria based policies should make the distinction between the hierarchy of sites. NPPG says that where appropriate landscape character assessments should be prepared.</p>
PS087	PS087/16	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	9ENV3		<p>Not justified, not effective and not consistent with national policy.</p> <p>Extensive areas have been identified, therefore it is essential that the policy should recognise that proposals for sustainable development can often be located within such designations without compromising their overall function and purpose.</p>	Policy should recognise that proposals for sustainable development can often be located within such designations without compromising their overall function and purpose.	Exploring options for further development in Daventry District to meet Northampton's needs is a matter for the review of the Part 1 WNJCS. A Local Development Scheme for the review of the WNJCS has been adopted.
PS087	PS087/17	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	9ENV5		<p>Not consistent with national policy.</p> <p>The policy should reflect the Framework's requirement to minimise impacts on biodiversity and provide net gains where possible. Harm should be considered through a planning balance exercise in accordance with the presumption in favour of sustainable development.</p>	None specified	<p>In discharging its duty to have regard to conserving biodiversity and to fulfil its statutory obligations, the Council should take a pragmatic approach and aim for a net gain in the pursuit of sustainable development. However, there is a hierarchy of designated sites and whilst the policy distinguishes between different types of sites, as currently worded local sites are given a similar level of protection as national sites. The Council would be prepared to consider a change to criteria A and B to clarify that they are treated differently through a statement of common ground.</p> <p>Criterion C already refers to net gains.</p>
PS087	PS087/18	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	9ENV7		<p>Not consistent with national policy.</p> <p>Policy should reflect the weight in decision making that national policy attributes to the hierarchy of designated and non-designated heritage assets.</p> <p>Should refer to the NPPF 2012 paragraphs 133, 134 and 135 regarding the assessment of the significance of both designated and non-designated heritage assets.</p>	ENV7 should specifically refer to NPPF paragraphs 133 and 134 and reflect guidance in paragraph 135.	Policy does not need to repeat national policy. A differentiation is made in the policies between the decision making process for designated and non-designated assets.
PS087	PS087/19	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	10CW1		<p>Not consistent with national policy.</p> <p>Requirement in criterion A.iv for Health Impact Assessments to be submitted alongside all major development proposals is inconsistent with national policy. NPPG confirms that HIA can be useful at planning application stage and consultation with the Director of Public Health can establish whether a HIA would be a useful tool.</p>	Delete criterion A(iv)	Criterion A.iv does not require the submission of health impact assessments but their submission would be supported to help demonstrate how proposals promote healthy communities.
PS087	PS087/20	Richard Crosthwaite	Gladman		Yes	Not specified	Not specified	Not sound	10CW3		<p>Not justified and inconsistent with national policy.</p> <p>The policy fails to take a pro-active approach to supporting the development of new facilities in villages. Local Plan should not focus on the urban centres, it should also focus on needs of rural communities.</p>	Extend policy to promote development of facilities in villages.	The aim of the policy is to protect local retail services and public houses outside Daventry town centre, which includes rural facilities as set out in para 10.2.01. It is not considered necessary for this policy to proactively support rural facilities. This is already covered by the settlement hierarchy policies and policy R2 of the WNJCS.



PS090	PS090/03	Giles Krempels	Richmond Properties		No	Not legally compliant	Not compliant	Not sound	9ENV3	<p>Legal compliance Not legally compliant because it is not in accordance with the Part 1 Plan. The green buffer was removed after examination because there were sufficient policies that provided a robust framework for the rural areas and a green buffer would be an unnecessary constraint. A Green Wedge introduced in the Part 2 Plan is not justified. There are sufficient protection policies in the Part 1 and Part 2 plans.</p> <p>Allocation fails to perform function of Green Wedge, it constrains residential and commercial development and does not allow acceptable sustainable development. It would prevent expansion of Moulton Park and would be harmful to the setting and viability of heritage assets as it would cut them off from community, which is against the Duty to Co-operate with organisations.</p> <p>Allocations around Moulton Park have not been based on a robust technical appraisal, bearing in mind the proposed new road system.</p> <p>Duty to Co-operate 1. Blanket Green Wedge does not assist neighbouring authorities (NBC) to deliver statutory housing obligations. Together with constraints it will force future development into the countryside. 2. Blanket Green Wedge designation from Lower Harlestone to Overstone mirrors the North West Orbital route. It restricts future flexibility and shows no co-operation with other public agencies.</p> <p>Soundness Positively prepared Does not take account of shortfall in neighbouring authorities' housing development or route of North West Orbital. Green Wedge stops any flexibility to develop, limits ability of developers to contribute to infrastructure and includes land owned by NBC.</p> <p>Justified Blanket Green Wedge is not justified as this area contains pockets of development opportunity offering strategic development for Northampton. Green Wedge focus on preventing coalescence is unsound.</p> <p>Effective Cannot expect there to be no urban development in this area until after 2029.</p> <p>Consistent with national policy Many parts of the area are unsustainable for modern agriculture because of conflicts between transporting machinery and road congestion. Growing population density leads to rural vandalism where livestock is let onto the roads.</p>	Remove Green Wedge from Lower Harlestone to Overstone.	<p>Designation of GW is a local issue and it is appropriate that it is considered in the part 2 plan.</p> <p>The green wedge policy was not removed by adoption of the Core Strategy. If it had been, it would have been listed in Appendix 5 of that plan.</p> <p>NBC and SNC have not raised Duty to Co-operate issues.</p> <p>The Green Wedge designation serves a specific purpose that is distinct from that of other policies.</p> <p>As set out in para 9.2.04 of the plan, the Green Wedge designation will be taken into account in the WNJCS review when options will be explored for further development in Daventry District to meet Northampton's needs. This aligns with the position taken in policy SP1 (B) that supports plan-led development to meet Northampton's needs. The Local Development Scheme for the review has been adopted by Daventry District Council, SNC and NBC. In the meantime, policy ENV3 does not preclude development taking place in the Green Wedge. However, it would need to demonstrate that it would maintain separation between and openness around settlements.</p> <p>Para 9.2.03 acknowledges that the Green Wedge designation would not prejudice strategic infrastructure projects. However, the justification for and route of the Northampton Northern Orbital Road has not yet been established.</p> <p>The proposed Green Wedge designations are based on evidence in the 2017 Daventry District Landscape Study, which assessed specific land parcels on the edges of Daventry and Northampton. The study is considered to be robust and the approach in the plan is justified.</p>
PS091	PS091/01	James Yeoman	Savills	Christ Church College, Oxford	Yes	Legally compliant	Compliant	Not sound	3	<p>Supports focus of development in the District to be on the town of Daventry, as set out by the Vision of the Local Plan (Chapter 3). The thrust of Objectives 6 and 7, relating to the strengthening and diversification of the local economy and the development of specialist employment clusters, is supported. Objective 9 relating to housing provision seeks to provide a range of housing in sustainable locations, focused at "...the most sustainable location of Daventry" is wholly supported by the College.</p>	None sought.	Comments welcomed.
PS091	PS091/02	James Yeoman	Savills	Christ Church College, Oxford	Yes	Not specified	Not specified	Sound	45P1	<p>Policy SP1 focuses development at Daventry town. The direction of growth towards Daventry as the District's main settlement is supported. This provides for a sound approach. This is particularly relevant in respect of residential development, owing to the Council's own recognition that the majority of delivery has, to date, been in the rural areas elsewhere across the district.</p>	None sought.	Comments welcomed.
PS091	PS091/03	James Yeoman	Savills	Christ Church College, Oxford	Yes	Not specified	Not specified		7EC4	<p>The Council's own evidence base identifies a need for employment development during the period of the LPP2. The western extent of Daventry town provides significant employment uses, evidenced by allocations EC4 and EC7. Land interest immediately abutting Apex Park has been promoted as a logical location for further employment provision at the town but has not been allocated.</p>	None specified.	<p>The allocations proposed in the plan will meet the needs set out in the evidence base. There is no evidence that further allocations are required. Site (ref 119) was submitted as an employment and residential scheme and was assessed as such. Table 1 refers to site 119 as only residential which is an error and will be amended to reflect the HELAA and SA. The reasons for excluding the site are set out in the Site Selection Background Paper (GEN6).</p>

PS091	PS091/04	James Yeoman	Savills	Christ Church College, Oxford	Yes	Legally compliant	Compliant	Not sound	9ENV3	<p>Drayton Gate Farm is not subject to national or local designations and based on the Landscape Matters Paper the site is of no more than ordinary value and lies at the lower end of the NPPF landscape value hierarchy. Principle of development should not be precluded for landscape reasons. Policy acts as a spatial planning tool not to protect a local space.</p> <p>Policy approach in A.i and A.ii is unjustified and the Part 2 Local Plan is unsound. Object to the principle of the policy given the development strategy in the rest of the plan. Policy ENV1 covers landscape character and quality. ENV3 is onerous, it repeats principles in ENV1 and should be deleted.</p> <p>In terms of the extent of the proposed Green Wedge west of Daventry, Landscape Matters Paper makes it clear that effect of development on visual amenity and separation between Daventry and Braunston would be viewed in different ways. Views from Braunston and the visual perception of Daventry would not be significantly changed. Green wedge is unduly expansive and proportionately restricted.</p> <p>The existing planted western boundary would be a suitable alternative Green Wedge boundary and allow future employment development. Development would not intrude into open countryside, it would be a discrete rounding off.</p>	Remove policy, however, if retained, delete client's land west of Daventry from Green Wedge.	<p>Para 113 (para 171 2018 NPPF) states that plans should make a distinction between sites depending on status.</p> <p>The proposed Green Wedge designations are based on evidence in the 2017 Daventry District Landscape Study , which assessed specific land parcels on the edges of Daventry and Northampton. The study is considered to be robust and the approach in the plan is justified.</p> <p>The designation is not predicated on land being of high landscape value, its purpose is to protect the identity and setting of villages and prevent coalescence.</p> <p>Policy ENV3 does not preclude development taking place in the Green Wedge. However, it would need to demonstrate that it would maintain separation between and openness around settlements. Policy ENV1 is a general landscape policy that applies across the district.</p>
PS092	PS092/01	Robert Love	Bidwells	Davidsons Developments Ltd (Brixworth)	Yes	Legally compliant	Not compliant	Not sound	1NP1	<p>Support Council's approach to encourage neighbourhood development planning. However, criterion iii requires allocations in neighbourhood development plans to comply with criteria in the settlement hierarchy policies, which restrict development outside village boundaries. Neighbourhood plans should be able to allocate housing growth outside boundaries. Object to final sentence and request that it is omitted.</p>	Remove final sentence of criterion iii.	<p>The purpose of the policy is to assist groups in preparing neighbourhood development plans and the final sentence of criterion iii is considered necessary to provide clarity to groups that they will need to be in general conformity with the relevant settlement hierarchy policy. For settlements covered by policies RA1-RA3 this will allow allocations outside of the confines subject to certain 'exceptional circumstances' including where there is an identified need.</p>
PS092	PS092/02	Robert Love	Bidwells	Davidsons Developments Ltd (Brixworth)	Yes	Legally compliant	Not compliant	Not sound	3	<p>Concerned that the vision does not sufficiently consider necessary growth implications for the District's rural area and does not sufficiently identify the settlements in the rural area to which the amount of growth will be directed. Concerned that Objective 9 restricts growth in the rural area to 'limited development'.</p>	The vision and objective should be amended to consider the necessary growth implications for Daventry District's rural area and the sufficient amount of growth for settlements in the rural area.	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS092	PS092/03	Robert Love	Bidwells	Davidsons Developments Ltd (Brixworth)	Yes	Legally compliant	Not compliant	Not sound	4SP1	<p>Promoting land west of Northampton Road, Brixworth Policy SP1 is unsound as the plan has not been positively prepared based on meeting current and future housing requirements. Acknowledge that the WNJCS is the key driver to identifying the scale and distribution of housing development for West Northamptonshire including Daventry District. However, concerned that Policy SP1 of the LPP2 restricts necessary housing growth</p>	Policy SP1 should be amended to consider the necessary growth implications for Daventry District's rural area.	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be positively prepared in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS092	PS092/04	Robert Love	Bidwells	Davidsons Developments Ltd (Brixworth)	Yes	Legally compliant	Not compliant	Not sound	5	<p>Approach taken to identifying additional housing growth at Daventry and no housing in the rural area is not a positive approach to plan-making based on a strategy that seeks to meet objectively assessed need of the WNJCS, is not justified by a robust evidence base and is inconsistent with the NPPF requirements. Council should take more proactive approach to identifying additional housing in Part 2 Local Plan based on potential additional housing need from evidence base that will underpin review if the WNJCS- including identifying amount of growth for individual settlements. Provision of smaller sites are more deliverable, can meet short term housing need and will enable Council to maintain 5 year land supply</p>	None Specified	<p>As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective. There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p>
PS092	PS092/05	Robert Love	Bidwells	Davidsons Developments Ltd (Brixworth)	Yes	Legally compliant	Not compliant	Not sound	5RA1	<p>Request further consideration of the status of Brixworth within the settlement hierarchy given its close proximity to Northampton. Consider that Brixworth should be identified within a higher sub-category within Primary Services Villages given the settlement's sustainability credentials.</p>	None Specified	<p>The hierarchy categories are defined in policy R1 of the WNJCS.</p>

PS092	PS092/06	Robert Love	Bidwells	Davidsons Developments Ltd (Brixworth)	Yes	Legally compliant	Not compliant	Not sound	6		Object to approach to only allocating additional housing growth in Daventry town to meet Districts housing needs. Large scale allocations will be reliant on significant infrastructure. Not sustainable to identify additional housing growth over and above Daventry North East SUE. Should take alternative approach as Rushcliffe have done (plan recently submitted). The 2,360 is not a ceiling and Council could allocate further housing growth in Daventry rural areas. Current approach is not justified by a robust evidence base and is inconsistent with the requirements of the NPPF. Smaller sites in sustainable villages will come forward in the short term to help meet need and sustain rural amenities and services.	None specified	As set out in the supporting text to the housing allocations, the Housing Background Paper (HOU1) and the Site Selection Background Paper (GEN6) the proposed allocations at Daventry town are deliverable and support delivery of the WNJCS spatial strategy and therefore in this respect the plan is positively prepared, justified and effective.  There is no outstanding need in the rural area as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS092	PS092/07	Robert Love	Bidwells	Davidsons Developments Ltd (Brixworth)	Yes	Legally compliant	Not compliant	Not sound	6HO8		Detailed mix of dwellings too prescriptive could result in viability and delivery issues. Focus on local evidence narrow. Policy not flexible, unjustified (evidence) and inconsistent with national policy. Level proposed to Building Regulations should relate to identified need. Reference to Building Regs not required.	Reference to detailed mix of housing types and sizes and reference to Building Regulations and other housing standards should be omitted. Percentage requirements should be targets.	As set out in the Housing Background Paper July 2018 (HOU1) there is sufficient evidence to justify the application of the optional standards particularly regarding space standards in the context of the need for more 2 and 3 bedroom properties. This helps to meet identified needs which accords with the NPPF particularly paragraph 50. Furthermore the Daventry Local Plan Part 2 Viability Assessment (GEN1) confirms that this policy would not make development unviable. The policy provides sufficient certainty about what house mix will be required, based on the evidence, but allows for some flexibility as proposals will be required to "largely reflect" the required mix.
PS093	PS093/01	Martin Flanagan	Pitsford Parish Council		No	Legally compliant	Compliant	Not sound	5RA2		Dispute the designation of Pitsford as a Secondary Service Village and that it fits in as an 'Other Village' as it has very limited number of services and facilities. Justified – Supporting evidence only just demonstrates that Pitsford meets the minimum level. Reassessment to take into account the lack of facilities and the poor bus service would change the scoring.	Pitsford to be reclassified as an 'Other Village' instead of a 'Secondary Service' Village.	The settlement hierarchy methodology set out in the Settlement Hierarchy Background Paper (GEN5) was informed by bespoke consultation in September 2016. The two stage approach is considered to strike an appropriate balance between qualitative and quantitative factors that takes into account the range of factors set out in criteria 1-10 of policy R1 of the WNJCS. It is therefore a robust approach to establishing the hierarchy.
PS093	PS093/02	Martin Flanagan	Pitsford Parish Council		No	Legally compliant	Compliant	Not sound	9ENV2		Parish Council contests the reduction in the SLA and support Brixworth Parish Council.	None specified	As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area Study (LAN1-4) was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the district.  The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (LINK). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study.
PS094	PS094/01	Alex Bullock	Pegasus	The Co-Operative Group	Yes	Not legally compliant	Not specified	Not specified			The legal compliance box was ticked, but no representations made about legal compliance.	N/A	N/A
PS094	PS094/02	Alex Bullock	Pegasus	The Co-Operative Group	Yes	Not legally compliant	Compliant	Not sound	5RA1		Supporting text to policy RA1 is negatively worded and runs counter to national guidance which seeks to significantly boost supply and ensure retention of thriving rural communities. Only allowing development outside of settlement boundaries in exceptional circumstances is inflexible and overly restrictive. More flexibility needed to allow appropriate development to maintain a 5 year land supply. Policy is not positively prepared or consistent with national policy.	Amend policy to allow growth directly adjacent to the settlement boundary where it meets a range of criteria.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs. There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS095	PS095/01	George Percy	Sworders	Mr P Noden	Yes	Legally compliant	Compliant	Sound	6HO2		The proposed allocation for residential development of our Client's land within Policy HO2 is welcomed and we can confirm the land is available, suitable and deliverable. Client welcomes inclusion of the Farmstead and surrounding land within policy HO2 increasing development provision to approximately 250 dwellings. Indicative masterplan demonstrates how development can be accommodated within the site and integrated with consented Micklewell park site. Technical highways work also demonstrates a safe and suitable access. Agree with chronology of delivery in Appendix J and understands Reserved Matters approval is well progressed.	None sought	Comments welcomed

PS095	PS095/02	George Percy	Sworders	Mr P Noden	Yes	Legally compliant	Compliant	Sound	6HO3		The proposed allocation for residential development of our Client's land within Policy HO2 is welcomed and we can confirm the land is available, suitable and deliverable. Client welcomes inclusion of the Farmstead and surrounding land within policy HO2 increasing development provision to approximately 250 dwellings. Indicative masterplan demonstrates how development can be accommodated within the site and integrated with consented Micklewell park site. Technical highways work also demonstrates a safe and suitable access. Agree with chronology of delivery in Appendix J and understands reserved matters approval is well progressed.	None sought	Comments welcomed
PS096	PS096/01	Steve Harley	Oxalis	Pedrix Ltd	Yes	Not specified	Not specified	Not sound	SA/HRA		It is not clear to what extent the proposed approach in the local plan of new employment allocations only located in Daventry town respond to the SA framework. It should be clarified how details and issues have informed and been reflected by the policies and strategy in the current draft of the emerging Part 2 plan. Primary service villages such as Brixworth should be subject to a more proactive and flexible approach to enable them to accommodate further employment development.	None specified	Part 3A of the Sustainability Appraisal (PSD2-1) sets out the approach taken to assessing employment allocations and their reasonable alternatives and outlines the reason for selecting the approach taken. Table 3.1c of the Sustainability Appraisal (PSD2-1) notes that 'There were no sites selected as alternatives in the rural area as the jobs requirement set in the WNJCS has already been met. However the plan does make small scale allocations in Daventry town to support the economy of the town and its role as a sub-regional centre.'
PS096	PS096/02	Steve Harley	Oxalis	Pedrix Ltd	Yes	Not specified	Not specified	Sound & not sound	3		Supports the following objectives; 3- Connections, 6- Economic Advantage, 7 – Specialist Business Development. Plan should recognise and more positively seek to meet objective 7 which implies a spatial or geographic approach which reflects the needs and demands of priority business sectors in Daventry District overall. This logically suggests economic development being targeted across different parts of the District reflecting the geography of key sectoral clustering, and brings into question the rationale and sustainability of the proposed spatial strategy which focuses new allocations to support economic development only in Daventry town.		As set out in the Employment Background paper (ECO1) the jobs requirement in the WNJCS has been met. In response to business intelligence a study was undertaken to look at demand for non-strategic employment. This identified demand for additional employment land at Daventry but not at Brixworth. Allocations have been made to accommodate this demand and are not justified in the rural area. WNJCS policy R2 allows for the expansion of existing businesses in the rural strategic employment areas subject to scale.
PS096	PS096/03	Steve Harley	Oxalis	Pedrix Ltd	Yes	Not specified	Not specified	Not sound	4SP1		While it is appropriate for Daventry to remain the primary focus for growth, we question and object to the stark difference in approach and the significant constraints imposed upon the next level of settlement in the hierarchy below Daventry. Object to the approach to employment development in Brixworth which is overly restrictive and unsustainable. In seeking to re-focus residential development on Daventry the emerging Plan includes very tightly drawn settlement boundaries at the Primary Service Villages. There are no new employment site allocations proposed at existing Strategic Employment Areas (SEAs), and the Brixworth SEA inappropriately remains outside of the settlement confines. Object to the emerging spatial strategy which does not represent the most sustainable strategy, and should be revisited and amended.	Changes are required to ensure that the Part 2 Local Plan provides a suitably positive, proactive, and sustainable strategy for Daventry District. Further non-strategic land allocations adjacent to the SEA in Brixworth would deliver new premises to meet a current, widely recognised shortage, and would deliver premises of direct interest and relevance to employers in specialist, high-value and knowledge-driven sectors. Such a response would accord with, not contradict, the strategic policies of the WNJCS.	The Part 2 plan meets the OAN set by part 1 plan. The Rural requirement has been exceeded. To encourage significantly more housing in the rural area would unbalance the spatial strategy. Limited development can be delivered through policies in chapter 5. This includes development outside the village confines where it meets specified criteria including local need. The Spatial strategy will be revisited through a review of the WNJCS. A Local Development Scheme for the review of the WNJCS has been adopted Strategic employment areas are defined outside of village confines to prevent policy conflict between EC4 and RA1 and to help protect existing employment. Policy R2 provides further guidance on the rural economy and applies across the rural areas.
PS096	PS096/04	Steve Harley	Oxalis	Pedrix Ltd	Yes	Not specified	Not specified	Not sound	5RA1		Recognition of the strategic employment role of Brixworth is welcomed and supported, Pedrix objects to the approach to employment development in this location which is overly restrictive and unsustainable. Brixworth Strategic Employment Area inappropriately remains outside of the settlement confines. Object to the apparent lack of consistency regarding the approach to sites outside of settlement boundaries and village confines – the suggestion is that residential sites will be regarded as being within the confines once built-out, but there is no similar approach to employment sites.	None Specified	Strategic employment areas are defined outside of village confines to prevent policy conflict between EC4 and RA1 and to help protect existing employment. Pollicy R2 provides further guidance on the rural economy and applies across the rural areas.

PS096	PS096/05	Steve Harley	Oxalis	Pedrix Ltd	Yes	Not specified	Not specified	Not sound	7EC4	Unclear how EC4 will work in practice to deliver additional employment land where the Strategic Employment Area is complete and has tightly drawn boundaries. Therefore limited new economic growth can be achieved.	<p>The Plan be modified to allocate additional land for non-office based employment uses (including B2 industrial, and B1c light industrial) on land immediately north of the existing SEA in Brixworth. Alternatively the Part 2 Plan should at least allow for appropriate physical expansion of the existing Strategic Employment Areas (SEAs). Proposed additional wording to EC4:</p> <p>Suitable proposals for the extension of the Strategic Employment Areas will be supported where:</p> <ul style="list-style-type: none"> <li>• they relate to land directly adjoining the existing employment area;</li> <li>• it is appropriate in terms of the scale and types of uses proposed;</li> <li>• where it relates to the continued growth or expansion of existing employers and/or specialist business sectors or clusters;</li> <li>• Where they do not conflict with other policies of this plan relating to housing or other allocations, access, landscape assets, flood-risk or heritage.</li> </ul>	As set out in the Employment Background paper (ECO1) the jobs requirement in the WNJCS has been met. In response to business intelligence a study was undertaken to look at demand for non-strategic employment. This identified demand for additional employment land at Daventry but not at Brixworth. Allocations have been made to accommodate this demand and are not justified in the rural area. WNJCS policy R2 allows for the expansion of existing businesses in the rural strategic employment areas subject to scale.
PS096	PS096/06	Steve Harley	Oxalis	Pedrix Ltd	Yes	Not specified	Not specified	Not sound	7EC1	<p>The Spatial Portrait gives a selective and partial overview of the District and overlooks or underplays a number of important, highly relevant, issues. Most notably no reference is given to net out flows of the District for work from 2011 census, also no reference is given to multi-faceted nature of the economy , priority growth sectors or employment land supply issues.</p> <p>Object to the selective approach taken, and suggest that the above weaknesses should be addressed by a more rounded and fuller depiction of some of the key issues (challenges and opportunities) facing the District.</p> <p>The explicit reference to several of the largest villages, including Brixworth, as "other main centres of population" is supported.</p>	<p>Changes are required to ensure that the Part 2 Local Plan provides a suitably positive, proactive, and sustainable strategy for Daventry District.</p> <p>Further non-strategic land allocations adjacent to the SEA in Brixworth would deliver new premises to meet a current, widely recognised shortage, and would deliver premises of direct interest and relevance to employers in specialist, high-value and knowledge-driven sectors. Such a response would accord with, not contradict, the strategic policies of the WNJCS.</p>	Section 2.4 is necessarily a brief overview of the economy. Further detail is provided in the Daventry District Economic Development Strategy 2018-2021.

PS097	PS097/02	Councillor Nick Bunting		Yes	Not specified	Not compliant	Not sound	9ENV1	<p>ENV1 and ENV2 will result in the removal of the SLA from the eastern side of the Nene Valley.</p> <p>Consultants engaged by the Parish Council (HBA) consider that there should be a precautionary approach to making changes where professional opinions differ. TEP study is not transparent and it is not clear how elements contribute to determine special qualities or distinctiveness. The proposed deletion of the SLA at Brixworth is not merited, it will reduce the level of protection which will lead to erosion and degradation of a valued landscape.</p> <p>Observations summarised as:</p> <ul style="list-style-type: none"> <li>• Photos show field sizes and intensification similar on both sides of Nene valley</li> <li>• Both sides of the valley have similar qualities and characteristics</li> <li>• Western side of Brixworth contributes to appreciation from the eastern side of the valley</li> <li>• TEP report does not acknowledge the neighbourhood plan or address concerns.</li> <li>• Appeal decisions, neighbourhood plan examination and other independent consultants support its designation as SLA</li> <li>• Limited change to the physical or perceptual qualities of the landscape since it was first designated or reviewed in 2014</li> </ul> <p>Fundamental changes to landscape protection must be overwhelming supported by evidence, which is not the case here.</p>	<p>Retain existing eastern edge of the SLA along the A508 from the Bramptons to the western edge of Brixworth including Hanging Houghton and Draughton.</p>	<p>As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area Study (LAN1-4) was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.</p> <p>The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (set out on page 105 of the Plan). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study (LAN1-4).</p> <p>Whilst the area to the west and south west of Brixworth meets some of the criteria and enables the wider SLA to the west to be appreciated, it is not considered to contain sufficient special qualities to distinguish it from the wider countryside. The Special Landscape Area Study and subsequent additional work undertaken by the Council's consultant identifies factors in this area which do not support its designation.</p> <p>The Council does not dispute the value the community attaches to the landscape and the Brixworth NDP appropriately makes a local neighbourhood plan designation of 'High Sensitivity' landscape, which was based upon evidence base work that was undertaken for the neighbourhood plan. The Brixworth NDP forms part of the development plan, therefore the 'High Sensitivity' landscape designation will be given due weight in decision making. In response to representations on the Emerging Draft Plan, policy ENV1 was amended in the Proposed Submission Plan to make reference to suitably evidenced local landscape designations in neighbourhood plans. ENV1 also provides guidance that seeks to maintain the distinctive character and quality of the District's landscapes. The combination of these policies in the development plan will ensure that the quality of the landscape is taken into consideration.</p>
PS097	PS097/03	Councillor Nick Bunting		Yes	Not specified			9ENV2	<p>ENV1 and ENV2 will result in the removal of the SLA from the eastern side of the Nene Valley.</p> <p>Consultants engaged by the Parish Council (HBA) consider that there should be a precautionary approach to making changes where professional opinions differ. TEP study is not transparent and it is not clear how elements contribute to determine special qualities or distinctiveness. The proposed deletion of the SLA at Brixworth is not merited, it will reduce the level of protection which will lead to erosion and degradation of a valued landscape.</p> <p>Observations summarised as:</p> <ul style="list-style-type: none"> <li>• Photos show field sizes and intensification similar on both sides of Nene valley</li> <li>• Both sides of the valley have similar qualities and characteristics</li> <li>• Western side of Brixworth contributes to appreciation from the eastern side of the valley</li> <li>• TEP report does not acknowledge the neighbourhood plan or address concerns.</li> <li>• Appeal decisions, neighbourhood plan examination and other independent consultants support its designation as SLA</li> <li>• Limited change to the physical or perceptual qualities of the landscape since it was first designated or reviewed in 2014</li> </ul> <p>Fundamental changes to landscape protection must be overwhelming supported by evidence, which is not the case here.</p>	<p>Retain existing eastern edge of the SLA along the A508 from the Bramptons to the western edge of Brixworth including Hanging Houghton and Draughton.</p>	<p>As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area Study (LAN1-4) was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.</p> <p>The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (set out on page 105 of the Plan). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study (LAN1-4).</p> <p>Whilst the area to the west and south west of Brixworth meets some of the criteria and enables the wider SLA to the west to be appreciated, it is not considered to contain sufficient special qualities to distinguish it from the wider countryside. The Special Landscape Area Study (LAN1-4) and subsequent additional work undertaken by the Council's consultant identifies factors in this area which do not support its designation.</p> <p>The Council does not dispute the value the community attaches to the landscape and the Brixworth NDP appropriately makes a local neighbourhood plan designation of 'High Sensitivity' landscape, which was based upon evidence base work that was undertaken for the neighbourhood plan. The Brixworth NDP forms part of the development plan, therefore the 'High Sensitivity' landscape designation will be given due weight in decision making. In response to representations on the Emerging Draft Plan, policy ENV1 was amended in the Proposed Submission Plan to make reference to suitably evidenced local landscape designations in neighbourhood plans. ENV1 also provides guidance that seeks to maintain the distinctive character and quality of the District's landscapes. The combination of these policies in the development plan will ensure that the quality of the landscape is taken into consideration.</p>

PS098	PS098/02	Mr O Mackaness			No	Legally compliant	Not compliant	Not sound	5RA2		Boughton's amenities are very limited. The scoring system is flawed. Comparison to Braunston, who has many more amenities and facilities, but scores the same for employment opportunities. Boughton's amenities are limited to a public house, primary school and a village hall. There is very small employment provision and limited bus service. Boughton has been put in the wrong village classification.	Boughton to be reclassified as an 'Other Village' instead of a 'Secondary Service' Village.	The settlement hierarchy methodology set out in the Settlement Hierarchy Background Paper (GEN5) was informed by bespoke consultation in September 2016. The two stage approach is considered to strike an appropriate balance between qualitative and quantitative factors that takes into account the range of factors set out in criteria 1-10 of policy R1 of the WNJCS. It is therefore a robust approach to establishing the hierarchy.
PS099	PS099/01	Daniel Hatcher	Rosconn Strategic Land		Yes	Legally compliant	Compliant	Not sound	5RA1		Not Positively Prepared- it will not assist with meeting identified needs of Weedon, particularly for affordable housing as no opportunities within the confines nor will it protect and supporting key local services and activities particularly in light of threat to vitality and viability of businesses as a result of opening of the DDLR bypass. Not justified –not an appropriate strategy to ignore identified local housing needs or need to protect against threat to key local services and facilities Not effective – does not meet Draft Plan's Vision and Objectives, specifically those relating to meeting identified local needs and to enhance or maintain vitality of rural communities Not consistent with national policy – does not include policies which would help support housing to meet local needs or enhance or maintain vitality of rural communities within Weedon as required by paras 77 and 78 of the NPPF	Allocate land at Dodford Wharf Farm to assist with meeting identified local housing needs and contribute to protection/enhancement of key local services and facilities.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS100	PS100/01	Andrew Gore	Marrons Planning	Mather Jamie	Yes	Legally compliant	Compliant	Not sound	5		Additional housing in sustainable rural locations would represent acceptable sustainable development as endorsed by the NPPF and would assist the Council with delivering much needed housing- additional deliverable sites should be allocated within sustainable settlements across the rural areas. This includes site at known as 'Land off West Haddon Road, Crick'.	Modification to the wording of Policy RA1 to reflect a more flexible approach to allow natural growth in rural areas.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS100	PS100/02	Andrew Gore	Marrons Planning	Mather Jamie	Yes	Legally compliant	Compliant	Not sound	5RA1		Agree that Crick is classified as a Primary Service Village however policy wording is overly restrictive which will limit natural growth in rural areas. Parts A and B focus on prohibiting development in the countryside inconsistent with the NPPF. Policy should be more flexible to allow for natural growth. Also considered to be little difference between wording of RA1 and RA2 – Council should revisit wording to clarify fundamental differences.	More flexible approach to allow natural growth in rural areas and clarify the difference between Primary and Secondary Service Villages.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.  Having a consistent approach to wording of policy RA1 and RA2 is to provide greater flexibility across the rural area and reduce the reliance on a small number of villages to deliver growth to meet identified needs. The Council does not consider there to be fundamental differences between the two stages of the hierarchy, and is content that the policies are appropriate. The respondent has not suggested any alternative wording to address the points they make.
PS100	PS100/02	Andrew Gore	Marrons Planning	Mather Jamie	Yes	Legally compliant	Compliant	Not sound	5RA2		Agree that Crick is classified as a Primary Service Village however policy wording is overly restrictive which will limit natural growth in rural areas. Parts A and B focus on prohibiting development in the countryside inconsistent with the NPPF. Policy should be more flexible to allow for natural growth. Also considered to be little difference between wording of RA1 and RA2 – Council should revisit wording to clarify fundamental differences.	More flexible approach to allow natural growth in rural areas and clarify the difference between Primary and Secondary Service Villages.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).  The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.  Having a consistent approach to wording of policy RA1 and RA2 is to provide greater flexibility across the rural area and reduce the reliance on a small number of villages to deliver growth to meet identified needs. The Council does not consider there to be fundamental differences between the two stages of the hierarchy, and is content that the policies are appropriate. The respondent has not suggested any alternative wording to address the points they make.

PS100	PS100/03	Andrew Gore	Marrons Planning	Mather Jamie	Yes	Legally compliant	Compliant	Not sound	5	RA6	Agree that RA6 recognises intrinsic character, beauty and tranquillity of the open countryside should be protected however the forms of development supported outside confines of villages should be expanded to state certain forms of development are acceptable in exceptional circumstances.	Insert reference to development outside the confines in exceptional circumstances	It is not considered necessary as this issue is adequately addressed through policies RA1- RA3. Additional criterion in policy RA6 would lead to confusion and would not have the necessary spatial tests that are present in policies RA1- RA3.
PS100	PS100/04	Andrew Gore	Marrons Planning	Mather Jamie	Yes	Legally compliant	Compliant	Not sound	7		Policies contained within the Local Plan Part 2 do not provide the flexibility needed to support sustainable growth in rural areas. An additional policy on the rural economy is required.	A rural economy policy should recognise that the right development in rural areas can support a thriving rural community, facilitating increased sustainability through creating more demand for village services and facilities which could ultimately lead to their improvement.	WNJCS policy R2 includes criteria for a range of economic development that would be considered suitable in the rural area.
PS100	PS100/05	Andrew Gore	Marrons Planning	Mather Jamie	Yes	Legally compliant	Compliant	Not sound		Appendix J	Raises question marks over the delivery of a number of sites; Monksmoor – further evidence needs to be provided by the Council to support anticipated delivery (356 dwellings over a 5 year period) including details of developer, timescales/commitment to developing out the site. Micklewell park – further evidence needed to support delivery of 460 dwellings from this site which has outline consent but undetermined reserved matters applications. Allocation EC3 (100 dwellings) and Daventry North East (200 dwellings) – further evidence needs to be provided to support anticipated delivery including details of the developer and timescales/commi	None specified	The supporting text to each allocation alongside the Site Selection Background Paper (GEN6) and the sustainability appraisal (PSD2-1) confirms that they are the most sustainable options. Furthermore section 6 of the Housing Background Paper (HOU1) sets out how and when the allocations, and Daventry North East are anticipated to come forward in the plan period. The same information for further commitments is set out in the Housing Land Availability report (HOU7) which again confirms the sites are deliverable. The HLA report and the Housing Implementation Strategy (HOU6) demonstrate how a 5 year land supply will be maintained.
PS101	PS101/01	Elaine Connolly	Bellway Homes Ltd (Northern Home Counties)		Yes	Not specified	Not specified	Not sound	3		Generally supportive of vision and desire to deliver ‘high quality housing for all and a superb quality of life for its communities’. There must be a more flexible spatial strategy for development in rural areas to achieve this including an allowance for sensible and proportionate growth in villages, including Secondary Service Villages such as Flore.	None specified	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS101	PS101/02	Elaine Connolly	Bellway Homes Ltd (Northern Home Counties)		Yes	Not specified	Not specified	Not sound	4		The plan is not positively prepared. Understand and appreciate the basis for the strategy in the context of protecting villages against inappropriate development. Acknowledge the plan facilitates some future rural development but the scope and flexibility is limited	The Plan should seek to ensure a level of growth could be achieved to not just support/protect existing services but encourage new services and facilities in villages to support viable communities for the future.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be positively prepared in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS101	PS101/03	Elaine Connolly	Bellway Homes Ltd (Northern Home Counties)		Yes	Not specified	Not specified	Not sound	4	SP1	The plan is not positively prepared. Understand and appreciate the basis for the strategy in the context of protecting villages against inappropriate development. Acknowledge the plan facilitates some future rural development but the scope and flexibility is limited. SP1(E) supports ‘limited development’ however ‘limited’ is undefined.	The Plan should seek to ensure a level of growth could be achieved to not just support/protect existing services but encourage new services and facilities in villages to support viable communities for the future.	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be positively prepared in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS101	PS101/04	Elaine Connolly	Bellway Homes Ltd (Northern Home Counties)		Yes	Not specified	Not specified	Not sound	5		Scope and flexibility of rural policies is limited. Requirement in policy S3 is not a cap, further appropriate development in rural areas should be supported where benefits outweigh the impacts. Policy SP1 (E) supports limited development to ensure existing village services are protected and enhanced – plan should seek to ensure level of growth in village also encourages new services and facilities. Primary and Secondary Service Villages (such as Flore) are evidently sustainable locations. Site for 45 dwellings is promoted at Flore.	None Specified	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.
PS102	PS102/01	Andrew Gore	Marrons Planning	Barwood Homes	Yes	Legally compliant	Compliant	Not sound	5		Additional housing in sustainable rural locations would represent acceptable sustainable development as endorsed by the NPPF and would assist the Council with delivering much needed housing- additional deliverable sites should be allocated within sustainable settlements across the rural areas. This includes site at known as ‘Land to the east of Brington Road, Flore’	None Specified	A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018). The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.

PS102	PS102/02	Andrew Gore	Marrons Planning	Barwood Homes	Yes	Legally compliant	Compliant	Not sound	5RA1		<p>Flore plays an important role in providing a range of services and facilities to meet day to day needs of the village and surrounding rural settlements. Daventry Development Link Road is near completion which would create opportunity to accommodate development in sustainable location with minimal impact upon the surrounding highway network.</p> <p>Flore therefore one of most appropriate settlements to accommodate local housing and should be identified as a Primary Service Village.</p> <p>Wording of RA1 is overly restrictive with will limit natural growth in rural areas. Parts A and B focus on prohibiting development in the countryside inconsistent with the NPPF. Policy should be more flexible to allow for natural growth.</p> <p>Also considered to be little difference between wording of RA1 and RA2 – Council should revisit wording to clarify fundamental differences.</p>	<p>Review policies RA1 and RA2 to distinguish between what is acceptable in Primary and Secondary Service Villages. Suggest a modification to these policies to reflect a more flexible approach to allow natural growth in rural areas.</p>	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p> <p>Having a consistent approach to wording of policy RA1 and RA2 is to provide greater flexibility across the rural area and reduce the reliance on a small number of villages to deliver growth to meet identified needs.</p> <p>The Council does not consider there to be fundamental differences between the two stages of the hierarchy, and is content that the policies are appropriate. The respondent has not suggested any alternative wording to address the points they make.</p>
PS102	PS102/02	Andrew Gore	Marrons Planning	Barwood Homes	Yes	Legally compliant	Compliant	Not sound	5RA2		<p>Flore plays an important role in providing a range of services and facilities to meet day to day needs of the village and surrounding rural settlements. Daventry Development Link Road is near completion which would create opportunity to accommodate development in sustainable location with minimal impact upon the surrounding highway network.</p> <p>Flore therefore one of most appropriate settlements to accommodate local housing and should be identified as a Primary Service Village.</p> <p>Wording of RA1 is overly restrictive with will limit natural growth in rural areas. Parts A and B focus on prohibiting development in the countryside inconsistent with the NPPF. Policy should be more flexible to allow for natural growth.</p> <p>Also considered to be little difference between wording of RA1 and RA2 – Council should revisit wording to clarify fundamental differences.</p>	<p>Review policies RA1 and RA2 to distinguish between what is acceptable in Primary and Secondary Service Villages. Suggest a modification to these policies to reflect a more flexible approach to allow natural growth in rural areas.</p>	<p>A range of sites has been provided for across the rural areas since 2011 meeting market and affordable needs . There is no outstanding need as the rural requirement (2,360) has been exceeded by 613 dwellings (as at 1st April 2018).</p> <p>The policy approach is considered to be effective in this context, it provides sufficient flexibility for development within confines and outside the confines in certain exceptional circumstances (as indicated in the plan) whilst maintaining the urban/rural balance of the spatial strategy.</p> <p>Having a consistent approach to wording of policy RA1 and RA2 is to provide greater flexibility across the rural area and reduce the reliance on a small number of villages to deliver growth to meet identified needs.</p> <p>The Council does not consider there to be fundamental differences between the two stages of the hierarchy, and is content that the policies are appropriate. The respondent has not suggested any alternative wording to address the points they make.</p>
PS102	PS102/03	Andrew Gore	Marrons Planning	Barwood Homes	Yes	Legally compliant	Compliant	Not sound	5RA6		<p>Agree that RA6 recognises intrinsic character, beauty and tranquillity of the open countryside should be protected however the forms of development supported outside confines of villages should be expanded to state certain forms of development are acceptable in exceptional circumstances.</p>	<p>Insert reference to development outside the confines in exceptional circumstances</p>	<p>It is not considered necessary as this issue is adequately addressed through policies RA1- RA3. Additional criterion in policy RA6 would lead to confusion and would not have the necessary spatial tests that are present in policies RA1- RA3.</p>
PS102	PS102/04	Andrew Gore	Marrons Planning	Barwood Homes	Yes	Legally compliant	Compliant	Not sound	7		<p>Policies contained within the Local Plan Part 2 do not provide the flexibility needed to support sustainable growth in rural areas. An additional policy on the rural economy is required.</p>	<p>A rural economy policy should recognise that the right development in rural areas can support a thriving rural community, facilitating increased sustainability through creating more demand for village services and facilities which could ultimately lead to their improvement.</p>	<p>WNICS policy R2 includes criteria for a range of economic development that would be considered suitable in the rural area.</p>
PS102	PS102/05	Andrew Gore	Marrons Planning	Barwood Homes	Yes	Legally compliant	Compliant	Not sound		Appendix J	<p>Raises question marks over the delivery of a number of sites;</p> <p>Monksmoor – further evidence needs to be provided by the Council to support anticipated delivery (356 dwellings over a 5 year period) including details of developer, timescales/commitment to developing out the site.</p> <p>Micklewell park – further evidence needed to support delivery of 460 dwellings from this site which has outline consent but undetermined reserved matters applications.</p> <p>Allocation EC3 (100 dwellings) and Daventry North East (200 dwellings) – further evidence needs to be provided to support anticipated delivery including details of the developer and timescales/commitment to developing out the site.</p>	<p>None specified</p>	<p>The supporting text to each allocation alongside the Site Selection Background Paper (GEN6) and the sustainability appraisal (PSD2-1) confirms that they are the most sustainable options. Furthermore section 6 of the Housing Background Paper (HOU1) sets out how and when the allocations, and Daventry North East are anticipated to come forward in the plan period. The same information for further commitments is set out in the Housing Land Availability report (HOU7) which again confirms the sites are deliverable. The HLA report and the Housing Implementation Strategy (HOU6) demonstrate how a 5 year land supply will be maintained.</p>

PS103	PS103/01	Mr MP Krempels		Yes	Not legally compliant	Not compliant	Not sound				Plan is not in accordance with the Part 1 plan. As a result of examiners review of that plan, DDC's green buffer was removed, as there were sufficient policies in the plan. This would prevent extension of Moulton Park.	The modification required is to delete Policy ENV3 or as a minimum delete the designation of Green Wedge from the proposals map where it occurs to the north of Northampton.	The green wedge policy was not removed by the adoption of the WNJCS. If it had been, it would have been listed in Appendix 5 of that plan. It is a matter a planning judgement, as to whether or not the designation in the part 2 plan is justified by evidence, not a matter of law.
PS104	PS104/01	Kenneth Morris	Badby Parish Neighbourhood Plan Group	No	Legally compliant	Compliant	Not sound	5RA2			Badby parish council has concerns about Badby being classified as a Secondary Service Village. Reference should also be made to emerging draft local plan representation for supporting evidence. Table 3.8 of the Settlement Hierarchy Background Paper is unsound as several of the NPS were 'made' before the draft local plan and could not comment on the hierarchy.	Badby should be re-categorised as an 'Other Village'. Amend Table 3.8 in Settlements Hierarchy Background paper which were 'made' prior to the draft Local Plan.	The settlement hierarchy methodology set out in the Settlement Hierarchy Background Paper (GEN5) was informed by bespoke consultation in September 2016. The two stage approach is considered to strike an appropriate balance between qualitative and quantitative factors that takes into account the range of factors set out in criteria 1-10 of policy R1 of the WNJCS. It is therefore a robust approach to establishing the hierarchy.
PS104	PS104/02	Kenneth Morris	Badby Parish Neighbourhood Plan Group	No	Legally compliant	Compliant	Not sound	11PA1			LGS1 Pinfold Green as defined in the submitted Badby Parish NDP is not included in Appendix I. This space complies with the NPPF criteria.	Include LGS1 Pinfold Green in Appendix I and Badby Inset Map.	The Badby Parish Neighbourhood Development Plan is at an advanced stage. The independent examiner accepted Pinfold Green as a LGS and DDC is satisfied that it meets the NPPF criteria.  If the neighbourhood development plan is made this would require a modification to the Policies and Inset Map for Badby in the part 2 local plan. For clarification this potential change is shown in the schedule of minor modifications (MiMd14).
PS104	PS104/03	Kenneth Morris	Badby Parish Neighbourhood Plan Group	No	Legally compliant	Compliant	Not sound		Map		LGS1 Pinfold Green as defined in the submitted Badby Parish NDP is not included in Appendix I. This space complies with the NPPF criteria.	Include LGS1 Pinfold Green in Appendix I and Badby Inset Map.	The Badby Parish Neighbourhood Development Plan is at an advanced stage. The independent examiner accepted Pinfold Green as a LGS and DDC is satisfied that it meets the NPPF criteria.  If the neighbourhood development plan is made this would require a modification to the Policies and Inset Map for Badby in the part 2 local plan. For clarification this potential change is shown in the schedule of minor modifications (MiMd14).
PS104	PS104/04	Kenneth Morris	Badby Parish Neighbourhood Plan Group	No	Legally compliant	Compliant	Not sound		Appendix I		LGS1 Pinfold Green as defined in the submitted Badby Parish NDP is not included in Appendix I. This space complies with the NPPF criteria.	Include LGS1 Pinfold Green in Appendix I and Badby Inset Map.	The Badby Parish Neighbourhood Development Plan is at an advanced stage. The independent examiner accepted Pinfold Green as a LGS and DDC is satisfied that it meets the NPPF criteria.  If the neighbourhood development plan is made this would require a modification to the Policies and Inset Map for Badby in the part 2 local plan. For clarification this potential change is shown in the schedule of minor modifications (MiMd14).
PS105	PS105/01	John Day	CPRE West Midlands	No	Not specified	Not specified	Not sound	8			Comments in para 8.3 relating to the Northampton Northern Orbital Route and the Northampton North West Relief Road are unsound. A substantive view should be made as to the Council's preferences for the routes. The consequences for villages and communities in the vicinity of these road proposals clearly should be provided with some indications of the District's likely preferred options and implications thereof.	The Council should set out in this plan its preferred options for the routes of the Northampton Northern Orbital Route and Northampton North West Relief Road.	The County Council has not established a justification for and does not have a fixed route for the NNOR. Therefore it is not possible to identify this in the plan. The plan already acknowledges the stage that the County Council has reached on proposals for the NNOR, but cannot say anything further at this stage.

PS105	PS105/02	John Day	CPRE West Midlands	No	Not specified	Not specified	Not sound	9ENV2	<p>Agree with the principle of the SLA but disagree with boundary amendments. There is justification for retaining all SLAs in saved policy EN10. The plan refers to protecting landscape character which is contrary to reducing SLAs. The Brampton Valley should be included in a SLA. Brixworth has developed close to its eastern and southern limits and may be subject to serious pressure to develop north and west, extending into and detrimental to the Brampton Valley's rural landscape.</p> <p>Concerned that despite the unique landscape character in Northamptonshire there are no national statutory designations.</p>	<p>As set out in paragraphs 9.1.09 to 9.1.11 of the plan, as part of the 2017 Daventry District Landscape Study a Special Landscape Area Study (LAN1-4) was undertaken. This considered whether there was justification for the retention of the SLA in its revised form and examined whether the SLA areas are sufficiently distinctive and have clearly apparent special qualities that set them apart from other landscapes in the District.</p> <p>The study focused on identifying valued landscapes using an approach that followed guidance from recognised sources (set out on page 105 of the Plan). This was used to identify what is special and distinctive about each SLA area using a number of criteria. Based on the evidence, a number of proposed changes were made to the boundaries of three of the SLAs, with some areas added and some removed. The explanation and justification for boundary changes is included in the Special Landscape Area Study (LAN1-4).</p> <p>Whilst the area to the west and south west of Brixworth meets some of the criteria and enables the wider SLA to the west to be appreciated, it is not considered to contain sufficient special qualities to distinguish it from the wider countryside. The Special Landscape Area Study and subsequent additional work undertaken by the Council's consultant identifies factors in this area which do not support its designation.</p> <p>The Council does not dispute the value the community attaches to the landscape and the Brixworth NDP appropriately makes a local neighbourhood plan designation of 'High Sensitivity' landscape, which was based upon evidence base work that was undertaken for the neighbourhood plan. The Brixworth NDP forms part of the development plan, therefore the 'High Sensitivity' landscape designation will be given due weight in decision making. In response to representations on the Emerging Draft Plan, policy ENV1 was amended in the Proposed Submission Plan to make reference to suitably evidenced local landscape designations in neighbourhood plans. ENV1 also provides guidance that seeks to maintain the distinctive character and quality of the District's landscapes. The combination of these policies in the development plan will ensure that the quality of the landscape is taken into consideration.</p> <p>Statutory designations such as national parks and AONBs are given to nationally important landscapes which are of the highest landscape and scenic beauty and display particular special qualities. The process to designate a national park or AONB involves Natural England and is subject to areas meeting specific designation criteria.</p> <p>The Council considered a preliminary case for AONB designation as part of the landscape evidence. This assessed the SLAs against Natural England's "Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England". The conclusion was that only the two SLAs in the south western part of the District displayed sufficient significance criteria to meet the requirements but they are not extensive enough on their own to warrant designation. Further work is underway to explore if, together with land outside of the District, a case for AONB could be made.</p>
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PS106	PS106/01	Paul Rouse	Savills	Stoford Gallan	Yes	Legally compliant	Not compliant	Not sound	4SP1				
PS106	PS106/02	Paul Rouse	Savills	Stoford Gallan	Yes	Legally compliant	Compliant	Not sound	5RA1	<p>Positively Prepared- Crick is identified as a Primary Service village but its development is restricted by RA1 to being within the confines of the village defined on the inset map other than in exceptional circumstances. This prevents the strategic policy of JCS SC1 and S8 2a from being achieved. It may also have a negative impact on the ability to achieve JCS S8 2c. Justified – Not most appropriate strategy to have blanket restriction on development outside the confines of a Primary Service Village – when to allow development in right location would directly contribute to achievement of protecting and enhancing local services and other objectives including delivery of strategic policy SC1. Plan not effective as doesn't have regard to strategic priorities. Not consistent with the NPPF policy to plan positively for development and infrastructure to meet identified needs.</p>	<p>Amend policy to allow for development outside Primary Service Villages where it is supportive of strategic objectives and vision. Alternatively site specific policy should be made to allow development to east and west of J18 for smaller scale B1/B2/B8 development to support DIRFT and meet market demand at this strategic location.</p>	<p>WNJCS policy R2 includes criteria for a range of economic development that would be considered suitable in the rural area.</p>	

PS106	PS106/03	Paul Rouse	Savills	Stoford Gallan	Yes	Legally compliant	Compliant	Not sound	5RA6	<p>Positively Prepared- Crick is identified as a Primary Service village but its development is restricted by RA1 to being within the confines of the village defined on the inset map other than in exceptional circumstances. This prevents the strategic policy of JCS SC1 and S8 2a from being achieved. It may also have a negative impact on the ability to achieve JCS S8 2c.</p> <p>Justified – Not most appropriate strategy to have blanket restriction on development outside the confines of a Primary Service Village – when to allow development in right location would directly contribute to achievement of protecting and enhancing local services and other objectives including delivery strategic policy SC1.</p> <p>Plan not effective as doesn't have regard to strategic priorities.</p> <p>Not consistent with the NPPF policy to plan positively for development and infrastructure to meet identified needs.</p>	<p>Amend policy to allow for development outside Primary Service Villages where it is supportive of strategic objectives and vision.</p> <p>Alternatively site specific policy should be made to allow development to east and west of J18 for smaller scale B1/B2/B8 development to support DIRFT and meet market demand at this strategic location.</p>	<p>WNJCS policy R2 includes criteria for a range of economic development that would be considered suitable in the rural area.</p>
PS106	PS106/04	Paul Rouse	Savills	Stoford Gallan	Yes	Legally compliant	Compliant	Not sound	7EC4	<p>Promoting land at J18 of M1 for employment use.</p> <p>The EC4e site identified on the Policies map is fully developed and does not offer any opportunity for significant net gains in floorspace or jobs, or to meet the specific needs of supporting DIRFT or the specific need for lorry parking facilities to serve DIRFT and the strategic highway network in this location.</p> <p>The sites promoted are however an extension of the EC4e strategic employment site (Crick Industrial Estate) where the SCLP supports expansion. They are wholly enclosed between the EC4e allocation and the DIRFT EC10 allocation. This is the logical location for additional employment development and the only location that can meet the specific locational requirements identified by the DMSU and the JCS.</p> <p>The failure to include the Stoford Gallan land to the east and west of J18 of the M1 as a Strategic Employment Area means that the Plan is not providing a strategy to meet the objectively assessed needs, it is not an appropriate strategy when the clear alternative delivers on all relevant policy matters and directly addresses the identified need. The Plan as drafted is not effective as it will not meet the need that has been identified and it is not consistent with national policy because it does not build on the areas strengths, and does not plan for storage and distribution uses at a variety of scales in suitable accessible locations. The need to support existing transport and infrastructure at DIRFT is not being taken.</p>	<p>The land promoted to the east and west of M1 J18 should be included as a Strategic Employment Area to which policy EC4 applies and be identified accordingly on the Policies Map. This would enable employment development to come forward to meet the objectively assessed need in the DSMU. It would also allow development of the western site for a lorry park and supporting facilities in accordance with policy ST2.</p>	<p>As set out in the Employment Background paper (ECO1) the jobs requirement in the WNJCS has been met. In response to business intelligence a study was undertaken to look at demand for non-strategic employment. This identified demand for additional employment land at Daventry. Allocations have been made to accommodate this demand and are not justified at DIRFT as these are only required for supply chain related activity as DIRFT 3 is built out and occupied</p> <p>Specific needs for lorry parking can be accommodated where the need is demonstrated through policy ST2 of the part 2 plan.</p>

PS106	PS106/05	Paul Rouse	Savills	Stoford Gallan	Yes	Legally compliant	Compliant	Not sound	7EC4	<p>Promoting land at J18 of M1 for employment use. The plan has failed to acknowledge the objectively assessed needs identified by its evidence base, including the need for small and medium units identified by the Employment Land in Daventry District: The Demand for Small and Medium Units by Peter Brett Associates and Aspinall Verdi October 2017. The Plan does not make provision to meet the need and ignores the key location where that need could best be met. The strategy proposed for employment areas is not therefore the most appropriate and proper consideration has not been given to meeting the objectively assessed need for small and medium units on land at J18 of the M1.</p> <p>Referring to the study of demand for small and medium sized units. The plan utilises 33% of total take-up as the basis for the land area required for provision of new accommodation. This must be an understatement of the actual level of provision because it would not account for a falling vacancy rate. It is additionally an understatement because it is based upon extrapolation of a past take-up trend constrained through historic lack of supply. To compound matters further, the Plan seeks to make provision for only 7 years of supply at the understated rate where there are 11 years of the Plan period remaining. The real level of requirement to meet the identified needs is substantially greater than what the plan is planning for.</p> <p>The addition of 7.3ha – 19.8ha including an allocation at South Eastern Gateway is stated in the Submission Plan, but it is not clear what makes up the additional area of land quoted, and there is no clear table setting out the employment target, the resulting employment and requirement, and the components of supply intended to meet that requirement.</p> <p>Site promoted meets all the requirements identified in the demand for small and medium units study and conforms with WNJCS policy S1 and have no conflict with Crick neighbourhood plan.</p> <p>The proposed allocations are not effective, not positive and not the most appropriate nor even an appropriate strategy. None of sites EC5 , EC6, EC7 and EC9 has direct access to the motorway. The draft allocations are not closely related to DIRFT, do not have prominence and are not prime locations where speculative development would be expected. This is evidenced by the lack of speculative development to date at committed sites in Daventry including Mustang Park.</p>	<p>The land promoted to the east and west of M1 J18 should be included as a Strategic Employment Area to which policy EC4 applies and be identified accordingly on the Policies Map. This would enable employment development to come forward to meet the objectively assessed need in the DSMU. It would also allow development of the western site for a lorry park and supporting facilities in accordance with policy ST2.</p>	<p>As set out in the Economy and Employment Background Paper (ECO1) the Objectively assessed needs are met though WNJCS allocations and permissions. In response to business intelligence a study was undertaken to look at demand for non-strategic employment. This study is considered to be robust and the plan is therefore justified. The employment allocations are deliverable and the study confirms that the market specifically at Daventry town performs well but has been constrained by a lack of supply .</p>
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