



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

Response by Daventry District Council

Matter 2: Spatial Strategy

Date: May 2019

1. Introduction

- 1.1 This statement sets out the response of Daventry District Council (DDC) to the following issues and questions raised by the Inspector relating to Matter 2 of the examination into the Settlements and Countryside Local Plan (Part 2) for Daventry District.
- 1.2 References used in this statement (e.g. PSD06) relate to documents held in the Examination Library available on the Council's website on the [Local Plan Examination webpage](#)¹.

2. Response of Daventry District Council to the specific issues and questions relating to Matter 2- Issue 1

Whether the Plan is consistent with the West Northamptonshire Joint Core Strategy Local Plan (Part 1) (JCS) and whether it has been positively prepared, is justified, effective and consistent with national policy in relation to the scale and distribution of development proposed.

1. ***What is the context provided by the JCS in terms of the overall scale of development required? What are the specific requirements for housing, employment, town centres, etc? Is the scale of development proposed in the Plan consistent with this?***
- 2.1.1 The WNJCS, as the part 1 plan sets out the overall scale of development based on an urban focused strategy established in policy S1.
- 2.1.2 The table below sets out the specific requirements for a range of development, what progress there has been to date and then identifies the level of development proposed in the part 2 plan, to demonstrate how the scale of development is consistent. The figures align with those set out in the modified housing trajectory set out (MiMD36) in the schedule of minor modifications (PSD12) which reflects monitoring data as at 1st April 2019.

¹ Local Plan Examination webpage: <https://www.daventrydc.gov.uk/living/planning-policy/part-2-local-plan/local-plan-examination/>

Type and Scale of Development in WNJCS (Context and Requirements)	Status at 1 st April 2019 and Source of Information	Scale Proposed in Part 2 Local Plan – consistency with WNJCS
Housing – Policy S3 of WNJCS	2019 HLA report- HOU10, Housing Background Paper- HOU01, NRDA Background Paper- GEN03	
Daventry Town: <u>4,620</u> dwellings	Completions as at 1 st April 2019:	958
	Planning Permissions expected to be completed by 2029:	1399
	Other Commitments expected to be complete by 2029:	1350
	Daventry North East - 1230 (part of Allocation in WNJCS - remaining 2770 post 2029)	
	Land to north and west of town centre - 120 (EC3)	
	Windfall Allowance by 2029: (20 dwellings per annum times by 8 years (2021/22-2028/29))	160
Proportion of district wide lapse rate for town	-20	
Total:	3847	Sum total of allocations at Daventry town: 1,350 ² HO1 1,100 HO2 250 HO4 0 Of which delivered by 2029: 1,220
		7737 Total Completions, Commitments, Allocations and Windfalls delivered by 2029 (allowing for lapses): 5067

² This does not include the following;
100 dwellings for allocation HO4 - Middlemore as the site has consent for 366 dwellings which is already included in the sum-total of planning permissions for the town, and
120 dwellings at EC3 which has been a long standing commitment in the HLA Report.

Daventry Rural Areas: 2,360 dwellings	Completions:	2,287	Further allocations not proposed in the Part 2 Local Plan
	Planning Permissions expected to be completed by 2029:	699	
	Windfall Allowance by 2029; (86 dwellings per annum times by 8 years (2021/22-2028/29)	696	
	Neighbourhood Plan Allocations:	7	
	Proportion of district wide lapse rate for rural area.	-180	
	Total:	3,509	
Northampton Related Development Area: 5,750 dwellings	Housing Implementation Strategy (HOU10)		
Northampton North of Whitehills : 1000 dwellings	Completions:	293	The position of the plan is referred to further in the response to Matter 3
	Expected further delivery by 2029:	707	
	Sum total anticipated completions by 2029:	1000	
Northampton North : 3,500 dwellings	Completions:	21	
	Expected further delivery by 2029:	2699	
	Sum total anticipated completions by 2029:	2720	
Northampton West (part in DDC): 1,050 dwellings	Completions:	0	
	Expected further delivery by 2029:	1062	
	Sum total anticipated completions by 2029:	1062	
Northampton Kings Heath (part in DDC): 200 dwellings	Completions : (Entire site in DDC now complete)	197	
Welford Road:	Completions	0	

41 Dwellings (Not allocated, but granted permission)	Expected further delivery by 2029	41	
	Sum total anticipated completions by 2029:	41	
Total Requirement: 5750 dwellings	Sum Total Completions by 2029 from SUE's and Welford Road:	5020	
Employment – Policy S7 of WNJCS	Monitoring data/ Employment and Economy background paper (ECO1)		
Minimum 28,500 jobs across West Northamptonshire Policy S8 (2) – Employment in Daventry	28,500 jobs figure has been met through completions/commitments. Additional evidence undertaken to establish demand for sub 10,000 sqm employment space (ECO3). Identified demand in range of 1.8ha – 3.5ha per year for 5 year period. Total requirement of between 9ha and 17.5ha.		Plan allocates sites to provide between 19.75ha to 32.32 ha.
Retail – Policy S9 of WNJCS	Retail and Town Centre Background paper (ECO2)		
5,100 sqm Comparison 2,900 sqm Convenience			The position of the plan is explained further in response to matter 4.

2. What is the overall spatial strategy for Daventry District and the approach of the JCS towards the distribution of development within Daventry Town, Rural Areas and the Northampton Related Development Area (NRDA)? Is the Plan consistent with this?

2.2.1 Policy S1 of the WNJCS sets out the over-arching spatial strategy for Daventry District in the context of West Northamptonshire as a whole. Under criterion B it identifies that appropriate development of a lesser scale (relative to that identified for Northampton) will be located in and adjoining the sub-regional centre of Daventry town. As identified in response to question 1 above, the scale of development identified in the WNJCS for Daventry town is 4,620 dwellings. As set out in section 6.1 of the plan (including the summary in table 4, page 49), taking into account existing commitments the plan needs to make further provision to ensure the requirements of the WNJCS are met. The proposed housing allocations, which are situated within and adjacent to the town are

necessary to meet the remaining requirements for Daventry and are in locations that are consistent with the over-arching strategy set out in policy S1 (B).

2.2.2 Criterion D of S1 sets out that new development in the rural areas will be limited with an emphasis on four criteria. The approach to development in the rural areas is further articulated through policies R1, R2 and R3. R1, identifies that there is a need for 2,360 dwellings in Daventry District. As set out above this requirement has been exceeded by a significant amount, 630 dwellings through completions and permissions (see also response to Matter 3 Question 2). The 2019 HLA report (HOU10) further explains how the existing pattern of development has not followed that established in the WNJCS. There have been 2,287 completions in the rural area compared with 958 completions at Daventry town. A split of 70% completions in the rural area to 30% completions in the urban area. This is clearly not following the WNJCS which anticipates a split of 66% (4,620 dwellings) in the urban area and 34% (2,360 dwellings) in the rural area. To ensure consistency with the WNJCS and reinforce and deliver its spatial strategy, there is no justification to identify additional allocations in the rural areas. However the WNJCS does not place a ceiling on further development in rural areas, but applies further criteria (i to v) now that the requirement has been met. Policy R1 also requires a settlement hierarchy to be established. In this context the Part 2 Local Plan is consistent with the strategy established in the WNJCS, it establishes the settlement hierarchy and sets out a policy approach consistent with policy R1 and S1(D).

2.2.3 Regarding the NRDA, the strategy of the WNJCS is one that identifies a number of Sustainable Urban Extensions adjacent to Northampton Borough both within Daventry District and South Northamptonshire in the context of policy S1-A which concentrates development primarily in and adjoining the principal urban area of Northampton. These form the basis of the 'requirements' identified in the table above. As established in the response to Matter 1 (Question 12) it is the Councils position that the plan should not identify further housing allocations for the NRDA, as this would need to be carried out as part of the review of the WNJCS in the context of a wider review of the level and distribution of housing growth. Notwithstanding this, the response to matter 3 (Issue 2 Question 14) identifies that in overall terms the level of provision exceeds the requirements in the WNJCS.

3 *Is the principle of focusing growth and allocations at Daventry Town and the proposed settlement hierarchy as identified in the Plan, consistent with the JCS?*

2.3.1 The principle of focusing growth and allocations at Daventry town has been addressed through the response to question 2 above. The proposed settlement hierarchy is consistent with the WNJCS as it clearly follows the guidance established in policy R1 in forming the settlement hierarchy (discussed in more detail in response to question 7 below) and placing settlements within the categories that R1 defines.

2.3.2 A substantial number of representations have been made on this issue, these have been addressed individually in document PSD11 but are also addressed through responses to questions 2 and 3 of this statement.

4 *Does the Plan include sufficient flexibility and contingencies to take account of unexpected changes in circumstances, including the review of the JCS?*

2.4.1 As set out in the housing trajectory (as proposed to be modified in the schedule of minor modifications, (PSD12) the plan includes provision of 1591 dwellings over the requirement for the District (6980 dwellings) identified in the WNJCS, taken from the housing trajectory on page 228 of the WNJCS. This 23% over-supply provides sufficient flexibility to take into account unexpected changes in circumstances. Furthermore, policy RA1 and RA2 clearly identify that further development can take place outside the confines of the village in exceptional circumstances (paras 5.2.19 and 5.2.23). Once such circumstance is where the land supply is less than 5 years. The Housing Implementation Strategy (HOU11) indicates this is not envisaged to occur but would provide further flexibility if it did. In addition the policies refer to development outside confines where there is an identified local need, therefore if further needs emerged through work on a review of the WNJCS, subject to the strategy that plan seeks to introduce, the part 2 plan clearly indicates the settlements where some further development might be located.

2.4.2 Furthermore regarding the review of the WNJCS, policy SP1 identifies some spatial principles which includes, at criterion B a clear reference to assisting with the delivery of plan-led development to meet Northampton's needs where this cannot be accommodated within the NRDA. Therefore if additional requirements for the NRDA arise as part of the review of the WNJCS and further policy mechanisms (including allocations) are identified as part of that review the part 2 local plan would not prejudice that process. Notwithstanding the flexibility provided in the Part 2 plan, it is not the role of the plan to anticipate the result of the WNJCS review, and a decision will need to be made after that review as to whether a full or partial review of the Part 2 Plan is required.

2.4.3 The need to provide more flexibility was raised by a number of representors; PS044, PS045, PS056, PS057, PS058, PS061, PS062, PS072, PS087, PS094, PS100, PS101 and PS102. This has been addressed in the response above and the Council's response to Matter 3.

5 How does the Plan intend to “assist with the delivery of plan-led development to meet Northampton’s needs where it is identified that this cannot be accommodated within the NRDA” as set out in Policy SP1? What is the current position in that respect?

2.5.1 As set out above, the intention of SP1 (B) is to ensure that if further allocations or policy mechanisms arise through the review of the Part 1 plan that require further development to be accommodated in Daventry District to meet the needs of the NRDA then the part 2 local plan would not prejudice that process. This is important as it acknowledges that the Part 2 plan will form part of the development plan when the Part 1 plan is being reviewed and helps to clarify the Part 2 plans position.

2.5.2 The response to Matter 1 outlines the current position in terms of the review of WNJCS.

6. Would the approach to green wedges influence the ability to meet the JCS housing requirement, including in circumstances where that requirement may be subject to a forthcoming review outside of this Plan?

2.6.1 The approach to green wedges would not influence the ability to meet the WNJCS housing requirement. As set out above (response to question 2) the plan provides sufficient supply against the needs identified for Daventry town and the Rural areas. Regarding the NRDA, the quantum of housing identified in the WNJCS relates to the sub-total of the SUE’s. Whilst delivery has been slower than anticipated this is not related to an absence of sites but slower than anticipated progress on the SUE’s. This is covered in more detail in response to Matter 3. Consequently the Green Wedge would not affect the ability to meet existing requirements. However regarding the review of the WNJCS, the supporting text (para 9.2.04) is clear that policy ENV3 would not prejudice the ability to accommodate further plan-led development however the policy should be taken into account to mitigate the potential impact of allocations.

2.6.2 The following representations have been made on this issue; PS069, PS081, PS089, PS090. The issues have been addressed above and in document PSD11. Importantly the North Northamptonshire Joint Planning and Delivery Unit (PS067) confirmed that they were satisfied that the policy, modified following the emerging draft consultation, would not prejudice the assessment of all options to meet Northampton’s long term growth.

7. Is the methodology used to determine the settlement hierarchy in Policies RA1, RA2, RA3 and RA4, robust and consistent with the evidence? Are there any significant factors that indicate that any individual settlements should have been identified in a different tier of the settlement hierarchy? If so, what key factors and evidence informed the approach of the Plan to those settlements and their intended categorisation?

- 2.7.1 The Settlement Hierarchy Background Paper (GEN04) sets out the process the Council has followed in establishing the settlement hierarchy through the plan-making process. The framework for establishing the settlement hierarchy is set out in policy R1 of the WNJCS which indicates the different settlement hierarchy categories and importantly sets out a series of criteria (1-10) that the part 2 local plans should have regard to.
- 2.7.2 To help inform the production of the settlement hierarchy, consultation, including on a proposed scoring mechanism, was included in the January 2016 Issues and Options Consultation. This was followed by a specific consultation on the Settlement Hierarchy methodology undertaken in summer 2016. The methodology used took forward the criteria set out in policy R1 in a two stage approach. Firstly applying a quantitative scoring mechanism (essentially addressing criterion 1 of the WNJCS) to seek to initially rank settlements according to the presence of different services and facilities according to their importance as identified in the WNJCS (para 16.10) - Most Important Services and Facilities, Important Facilities and Services and Other Facilities. To reflect their importance scoring was weighted more heavily towards the presence of 'Most Important Services and Facilities' e.g. Primary School, General Food Store, GP Surgery (page 15-17 of GEN04). It was also necessary to include a threshold, i.e. a minimum score for settlements to achieve to be located in a particular hierarchy (page 18 -20 of GEN04). This then provided an initial hierarchy at stage 1. The information used to inform stage 1 was based on data held by the Local Land and Property Gazetteer (page 15 of GEN04) which is updated regularly using Council Tax, Business Rates, elections data and other associated data sets.
- 2.7.3 Following stage 1 a qualitative assessment was undertaken (page 28 – 67 of GEN04) which sought to apply criteria 2-10 of policy R1 and allowed an analysis of whether the settlement was in the appropriate position in the hierarchy. The summary of the outcomes of stage 1 and stage 2 are then presented (page 23 of GEN04) with an overall conclusion of where the settlement should be positioned in the hierarchy.
- 2.7.4 This process is considered to be robust, it follows the approach established in policy R1 and strikes an appropriate balance between using data and scoring the presence of certain services and facilities alongside a reflective assessment to allow factors that cannot be obviously captured by data to be taken into account, e.g. the role, scale and character of a settlement. Paragraph 5.5 of (GEN04) confirms that the data used to inform both stages of the assessment has been kept up-to-date and was last updated in June 2018 which again confirms that the approach taken is robust.

- 2.7.5 There have been specific representations arguing that some individual settlements should be located in a different category (PS084, PS092, PS102, PS006, PS008, PS009, PS013, PS028, PS040, PS047, PS048, PS093, PS098, PS104, PS033). The Council has addressed these individual representations within document PSD11 which is also shown in EXAM1B and EXAM1C. It is acknowledged that within an individual settlement hierarchy category there is a range of settlements that may have different roles, functions and character however this is an inevitable consequence of needing to identify 90 settlements into the four settlement categories established in the WNJCS.
- 2.7.6 It is not considered that there are any significant factors that warrant individual settlements being identified in a different settlement hierarchy category. It is acknowledged that there have been changes to bus services at various settlements across the district, however because this only features in stage 1 of the assessment it is not considered to be the determining factor in where a settlement is placed in the hierarchy. Furthermore this position is fluid, with some services stopped temporarily due to lack of subsidy that have subsequently been reintroduced.
- 2.7.7 It is important that the hierarchy can endure through the plan period irrespective of changes in service provision within individual settlements and the methodology used, particularly with the qualitative assessment (stage 2), ensures this is possible.
- 8. *What is the approach of the Plan in terms of defining settlement boundaries or confines and development in rural areas? Do those approaches reflect the characteristics, roles and functions of individual settlements and other areas of Daventry District during the plan period?***
- 2.8.1 The Plan has sought to define confines for Primary and Secondary Service Villages and as set out in para 5.2.07 of the Part 2 Local Plan these have been mapped to provide clarity for decision making and reflects their roles at the higher end of the hierarchy. Para 5.2.07 also sets out the process undertaken in formulating the confines. Where confines have been defined through Made neighbourhood plans these have been used as the basis for the confines in this plan. The confines have not been formally identified for Other Villages but can be determined for development management purposes based on the criteria in table 3. As confirmed in para 5.2.25 it was not considered necessary to map the confines because the levels of development is anticipated to be limited for these villages. However as confirmed in para 5.2.26 confines for these villages can be defined in Neighbourhood Plans, which has happened at Onley (Barby and Onley NDP) and Welton.
- 2.8.2 The policy approach set out in RA1, RA2, RA3 and RA4 reflects the characteristics, roles and functions of individual settlements through providing specific criteria-based policies according to their position within the settlement hierarchy. For Primary and Secondary Service villages this focuses development in the confines of the village, but acknowledging that these settlements are relatively more sustainable than other

settlements elsewhere in the hierarchy, allowing for development outside the confines in a range of exceptional circumstances. For Other Villages the approach is more restrictive, with development outside the confines only to meet an identified local need. For Small Settlements/Hamlets, which have an extremely limited range of services and facilities and are therefore not considered sustainable locations for development, the approach taken is the same as to be applied to open countryside under policy RA6. Consequently it was not necessary to identify confines for these settlements. Moreover the criteria within policies RA1, RA2 and RA3 further help to ensure development proposals will need to reflect the characteristics, roles and functions of individual settlements.

2.8.3 As established in response to Question 2 the rural requirement has been exceeded and therefore there is no justification for making further allocations in the rural areas.

2.8.4 A number of representations have argued that the confines are too tightly drawn and do not allow for expansion. However, the approach taken in the plan is considered to be robust. It is important that the confines are defined consistently against clear criteria. Furthermore it is considered that there is sufficient flexibility as development outside the confines may be acceptable in exceptional circumstances.

2.8.5 A change is necessary to the village confines at Badby as a consequence of the outcome of the Neighbourhood Plan examination and subsequent referendum. The plan is now made, forms part of the Development plan with a settlement boundary that is different to that proposed on the Badby Inset Map. This is identified as MiMd12.

9. *Is the wording of Policies RA1, RA2, RA3 and RA4 sufficiently clear for the purposes of decision-making? Is the wording consistent with other related policies of the Plan (i.e. Policies ENV7, ENV10, EC4, CW3)? Is the restriction that development outside of defined confines will only be acceptable in “exceptional circumstances” as set out in Policies RA1 and RA2, justified and consistent with national policy?*

2.9.1 Policies RA1, RA2, RA3 and RA4, alongside the criteria in table 3 and the mapped confines on the inset maps are considered to be sufficiently clear for the purposes of decision-making. They firstly define which villages fall within that hierarchy where that policy should be applied. They then clearly direct where development should be located (criteria A and B) before then identifying a series of criteria that all development proposals should meet (criterion C). These are necessary to ensure the development reflects the role and character of the settlement, including that it does not result in the loss of existing services and facilities important to the role of the settlement in the hierarchy, protects the character of the settlement, is accessible without the reliance on the private car and protects residential amenity. In respect of Small Settlements/Hamlets the approach is clear through identifying the small settlements/hamlets then directing development proposals to be assessed against

policy RA6. For Primary, Secondary and Other Villages criterion D then helps to guide the neighbourhood planning process.

- 2.9.2 Furthermore for Primary and Secondary Service villages they identify in the supporting text what might typically constitute exceptional circumstances which is considered to provide further clarity for decision making. However to further assist the clarity of the plan a minor modification to exceptional circumstances identified in paragraphs 5.2.19 and 5.2.23 is necessary to clarify that the housing need should be identified at a settlement level within the Parish. This is identified in MiMd20 in the proposed schedule of minor modifications (PSD12).
- 2.9.3 The policies are consistent with policies ENV7, ENV10, EC4 and CW3. Looking at these in turn, policy ENV7 focuses on conserving and enhancing the historic environment, which would be used alongside the policies in RA1, RA2, RA3 and RA4 where development proposals affect particular historic assets.
- 2.9.4 Policy ENV10 provides a series of design criteria that would be used alongside policies RA1, RA2, RA3 and RA4. Policy EC4 protects strategic employment areas, which is only relevant to policy RA1 as these exist at the Primary Service Villages. These policies align as RA1 seeks to avoid the loss of land from employment use in general terms whereas policy EC4 focuses on different 'employment generating uses' with a priority for the retention of B1 (b,c) B2 and B8 but not precluding other 'employment generating uses' from coming forward.
- 2.9.5 Policy CW3 provides further specific guidance regarding the protection of local retail services and public houses taking forward the criteria in policies (RA1, RA2 and RA3) that seeks to protect existing services and facilities.
- 2.9.6 The restriction for allowing development outside the confines only in 'exceptional circumstances' is justified particularly in the context of the rural requirement having been exceeded and the importance of following the strategy established in the WNJCS.
- 2.9.7 Furthermore, this approach, and particularly the exceptional circumstances identified in paragraphs 5.2.19 and 5.2.23, are consistent with national policy for the following reasons. Firstly, as a part 2 Local Plan that follows the WNJCS the approach is genuinely plan-led. Furthermore they are consistent with paragraph 54 in that they provide sufficient flexibility to be able to respond to local circumstances and reflect local needs. In addition, the reference to exceptional circumstances to clearly meeting an identified local need and supporting an essential local service that is under threat is consistent with chapter 3 and the need to support a prosperous rural economy and paragraph 55 which focuses on development being located where it will enhance or maintain the vitality of rural communities.

10. *Is the approach of Policy RA6 relating to the open countryside, justified and consistent with national policy?*

- 2.10.1 The approach taken in policy RA6 is justified, there is no requirement for further development in the rural areas and such a restrictive approach is necessary to reinforce the spatial strategy established in the WNCJS. This approach is also consistent with national policy. Core planning principle 5 recognises the intrinsic character and beauty of the countryside and para 55 of the NPPF confirms that to promote sustainable development in rural areas housing should be located where it will enhance or maintain the vitality of rural communities and avoiding isolated homes unless there are special circumstances. Such circumstances have been reflected in the policy.
- 2.10.2 The following representations were made to policy RA6, PS001, PS007, PS062, PS070, PS072, PS087, PS100, PS102, PS106. These issues have been addressed in document PSD11 and in the response to questions 9 and 10 of this statement. Historic England (PS042) made a representation in relation to criterion C of policy ENV7 regarding enabling development. As a result of responding to that representation, the Council has agreed through a statement of common ground (SCG01) to suggest the deletion of criterion C through a potential main modification (PMM10). Policy RA6 refers to enabling development in criterion iv and as a consequence of PMM10, the Council is proposing a further modification (PMM01) to change criterion iv, as set out in SCG01.
- 2.10.3 To ensure further consistency with Policy R2 of the WNCJS regarding the expansion of existing business a main modification is required (PMM02), this is proposed as follows under a new criterion;

ix. Economic development that accords with policy R2 of the West Northamptonshire Joint Core Strategy.

11. *Are the approaches of Policies NP1, RA1, RA2 and RA3, justified and consistent with national policy, in so far as they seek that allocations in neighbourhood development plans comply with criteria set out in the relevant settlement hierarchy policy of the Plan?*

- 2.11.1 This approach is considered to be justified particularly in the context to the rural requirement established in the WNCJS being exceeded and the need for allocations themselves to be justified. For RA1 and RA2, through the requirement for consistency with criterion B this reflects that these settlements are more sustainable and therefore there are wider circumstances that may justify allocations including the examples identified in paras 5.2.19 and 5.2.23. For other villages (RA3) the requirement for allocations to be consistent with criterion B means they would only be justified where there is an identified local need. For all villages the requirement to be in general conformity with criterion C helps provide clarity to neighbourhood planning groups on

what they should be taking into account in determining appropriate locations for development.

2.11.2 This approach is considered to be consistent with national policy, it recognises the important role neighbourhood plans can play in the decision making process (para 184) and is particularly consistent with paragraphs 28, 54 and 55 in seeking to ensure that villages remain vibrant and can be responsive to meeting local needs, including affordable housing. The extensive experience of the District Council in working positively with a number of neighbourhood planning groups resulting in 14 made neighbourhood plans has helped inform this approach.

2.11.3 The following representations were made in relation to this issue, PS041, PS084, PS087, PS092 and these have been addressed in the response above and in document PSD11.

12. *Are Policies NP1, SP1 RA1, RA2, RA3, RA4, RA5 and RA6 otherwise positively prepared, justified, effective and consistent with national policy?*

2.12.1 As set out above, the policies are justified in the context of the WNJCS and help to deliver its spatial strategy, they are positively prepared and provide a positive context for decision making proposals to be assessed against. They are effective in that they help to ensure a sustainable pattern of development and are consistent with national policy for reasons previously mentioned. Furthermore they accord with para 154 of the NPPF in that they provide a clear indication to the decision maker how to react to development proposals.

2.12.2 Furthermore, as stated previously the settlement hierarchy is based on a robust evidence base, following the framework identified in policy R1. Moreover, establishing the hierarchy using a 2 stage approach this has ensured that the policies sufficiently reflect the role and characters of individual settlements (core planning principle – 5th bullet).

Response of Daventry District Council to the specific issues and questions relating to Matter 2- Issue 2

Whether the approach towards infrastructure is justified, effective and consistent with national policy, so as to ensure the timely delivery of the scale and distribution of development in the Plan.

1. *What are the likely impacts of the proposed scale and distribution of development on infrastructure? How have these been assessed?*

3.1.1 The likely impacts of the proposed scale and distribution of development on infrastructure have been assessed through technical assessments; transport modelling (TR01, TR02) and water and wastewater infrastructure capacity assessment (WFR01) and site by site discussions with statutory organisations, predominantly related to education. The infrastructure requirements are set out in the Infrastructure Delivery schedule.

3.1.2 As indicated in TR01, three scenarios were modelled including 2015 baseline, 2031 'do minimum' scenario which modelled all committed growth within the West Northants Joint Core Strategy and 2031 'all committed growth within WNJCS and the Part 2 Local Plan allocations'. In conclusion the traffic modelling demonstrates a number of junctions that are close or over capacity, which then identifies three junctions within the town that will require mitigation.

3.1.3 Other infrastructure requirements of the allocations are detailed in Appendix H Infrastructure Delivery schedule of The Local Plan. See response to question 2 below.

2. *What specific improvements to infrastructure are proposed or will be required? What is the likely cost? How will they be brought forward and funded?*

3.2.1 As detailed in Appendix H of the Part 2 Local Plan the Infrastructure Delivery Schedule (IDS) sets the additional infrastructure requirements for each of the allocations identified in the Submission version of the Local Plan Part 2. These have been updated and are shown in revision B GEN08.

3.2.2 The IDS builds on the WNJCS Policy and Infrastructure Delivery Plan (WNJCS01). Policy INF 1 and Policy INF 2 of the WNJCS set out the approach to infrastructure and delivery. Table 7 identifies the key primary infrastructure projects across the West Northamptonshire area. Appendix 4 (Pg 232 – 256) of the WNJCS that sets out the West Northamptonshire Delivery Plan (IDP) that identifies the strategic priorities for delivery of key infrastructure needed to support growth in the WNJCS.

3.2.3 The Local Plan IDS provides details of the lead delivery, broad phasing, estimated cost and funding sources of each type of infrastructure. It is intended that the IDS is a live document that is regularly updated as allocations are delivered over the plan period.

3.2.4 Following further discussions with the County Council (including education, highways, and flooding) and the promoters of the housing allocations, the IDS has been revised (Revision B GEN08) . These include confirming who the lead delivery would be (NCC or Developer), costs where known and phasing of delivery. At this stage much of the information is unknown until further detail of individual schemes are provided although the timing of delivery of infrastructure is linked directly to housing delivery.

3. ***Have the A45 Braunston Road/Timken Way roundabout, A45 Stefen Way/A425 roundabout and Eastern Way/Northern Way roundabout been subject to individual junction traffic modelling as part of the Plan to identify the scale of improvements required in accordance with the recommendations of the Transport Modelling evidence (TR1 and TR2)? How are any improvements intended to be delivered by the Plan?***

3.3.1 As the transport modelling has been carried out and updated this provides a clear baseline for specific development proposals to be assessed against in liaison between NCC highways and site developers. This will allow for specific contributions and costs for the specific junction improvements identified in the model to be determined through the development management process. Consequently the specific junction improvements have not been subject to individual traffic modelling as part of the plan however they have been identified within the Infrastructure Delivery schedule and would be delivered through the development management process through the traffic assessment work undertaken in support of applications relating to the proposed allocations. This position was confirmed as appropriate by Northamptonshire County Council as Highway Authority.

4. ***Is the approach in the Plan justified with respect to the Northampton Northern Orbital Route and Northampton North West Relief Road? Are there any updates in terms of the current status of those projects, routes, timescales and sources of funding? Have the potential implications of the delivery of those projects been accounted for as part of the identification of allocations in the Plan?***

Northampton Northern Orbital Route (NNOR)

3.4.1 Northamptonshire County Council has undertaken two stages of consultation on the NNOR, but because of funding issues, work is not currently progressing on this project. The road is not required to facilitate the allocations within the WNJCS (evidenced by the absence of any policies requiring its provision), and the Part 2 plan is not proposing any additional development in this location.

- 3.4.2 A report was presented to the County Council's Cabinet in October 2018. This report identified the scheme as remaining a priority for the County Council, and that funding be sought to allow further work to be undertaken. No funding is currently available, and this work is therefore currently paused.
- 3.4.3 As noted in section 8.3 of the plan, this project is not sufficiently developed to warrant anything more than a reference, there is, for instance, no safeguarded route or agreed route.
- 3.4.4 As a strategic project, this matter can be given further consideration as part of the work on the West Northamptonshire Joint Strategic Plan.

Northampton North West Relief Road (NNWR)

- 3.4.5 A short section of this road (east of the A428) was constructed as part of the development of that part of the Kings Heath allocation which is within Daventry District - Policy N7 of the WNJCS. The next section, going eastwards, forms part of the planning permission to develop 3,000 houses on the Kings Heath allocation in Northampton Borough, and will be funded by the developer. The remaining section i.e. from the allocation to the A5199 will be the subject of a planning application which the County Council is planning to submit (to itself) in the summer of 2019.
- 3.4.6 This road is needed to enable the development identified in the WNJCS, and is identified in policy N12 and an indicative alignment is shown on Figure 4 on page 314. The Part 2 plan is not proposing any additional development in this location.
- 3.4.7 The County Council considered a report on this matter in October 2018. This report identified funding sources for the remaining section of the road: this would consist of SEMLEP Growth Fund, Section 106/CIL monies and funding from Northampton Borough Council. The report identified a preferred route, which differs in some respects from that included in the WNJCS. The report further noted that construction of the scheme will begin in early 2020 with the road opening towards the end of 2021.

5. ***Is there a need to include any additional specific infrastructure projects in the Plan? Does the Infrastructure Delivery Schedule (Appendix H) take sufficient account of the need to assist delivery of the allocations and any cross-boundary implications of infrastructure requirements?***

- 3.5.1 At present it is not considered that any additional infrastructure projects are required. However the Infrastructure Delivery Schedule (IDS) will be regularly updated and consulted on with statutory consultees and partners to reflect any changes that emerge over the plan period.
- 3.5.2 Read in conjunction with the IDS in the WNJCS, it is considered that the IDS in the Local Plan does take sufficient account of the need to assist delivery of allocations. It identifies the strategic provision of a number of types of infrastructure. Due to the

location of the allocations within the District it is considered not necessary for the IDS to make reference to cross boundary implications of infrastructure requirements.