



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

**Response by Daventry District Council**

**Matter 3: Delivering the housing requirement over the  
plan period**

**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 3 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](#)<sup>1</sup>.

## 2. Response of Daventry District Council to the specific issues and questions relating to Matter 3 – Delivering the housing requirement over the plan period

### Issue 1:

Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy, so as to ensure the timely delivery of the JCS housing requirement for Daventry District.

*The JCS plan period is from 2011 to 2029 and sets the housing requirement for Daventry District. Revising the housing requirement is not within the scope of this Plan. Discussion at this hearing session will, therefore, focus on ensuring the Settlements and Countryside Local Plan (Part 2) for Daventry District allocates sufficient housing land to deliver the housing requirement as set out in the adopted JCS. In responding to the following questions, the Council should seek to identify and address specific concerns raised in representations.*

### Questions

1. ***Is there a specific reason or justification why the housing trajectory in the Plan and the Housing Land Availability Report 2018 (HOU7) when setting out the completions and housing land supply position as at 1 April 2018, exclude the NRDA component listed in the JCS? Does the Plan intend to support the delivery of the housing requirement in the NRDA in Daventry as set out in the JCS?***
- 2.1.1 The WNJCS sets out a housing requirement for Daventry District outside of the NRDA and this has been used for calculating the 5 year housing requirement since adoption of the WNJCS. This approach has been accepted (and never rejected) in several section 78 appeals in both Daventry District and South Northamptonshire district. The 5 year housing land supply for the NRDA is produced in a separate report which is produced by Northampton Borough Council with assistance from Daventry and South Northamptonshire councils. It is important to note that the NRDA is a policy tool to deliver the housing requirement for Northampton, not all of which could be met within

---

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

its boundaries. A number of Sustainable Urban Extensions are allocated in the WNJCS to meet this need some of which are in Daventry and South Northamptonshire districts. These are identified based on an assessment of the most sustainable locations. The housing figures in the WNJCS identified as the NRDA requirement in Daventry District reflects this site selection process, i.e. there is not an apportionment of the Northampton requirement to the districts. Thus the 5 year calculation for the NRDA has to be based on all of the NRDA geography, not just the DDC part of it.

- 2.1.2 The sites are already allocated in the WNJCS, therefore, the principle of development has been established through that plan. The S&CLP does not need to do anything further in respect of the principle of development. The sites are all progressing through the planning system as briefly described below (see also response to question 1 of Matter 2 statement);

Northampton North (Policy N3)

The southern part has permission for 2,000 dwellings, 1,800 in outline and 200 of which are in full. Development is underway on the 200. A Reserved Matters application has recently been submitted for a further 216 dwellings (of the 1,800).

The Council is currently involved in pre-application discussions with the applicant regarding the northern part for 1,500 dwellings.

Northampton West (Policy N4)

A small part of this allocation has the benefit of planning permission and is currently being developed.

The major part of the remaining allocation is subject to two outline planning applications which are expected to be considered at the planning committees of DDC and South Northamptonshire Council in July 2019.

Northampton Kings Heath (Policy N7)

The major part of this allocation is in Northampton Borough and an outline application has been approved. A small part is in Daventry district, and this has all been built - 197 dwellings.

Northampton, North of Whitehills (Policy N8)

All of this site has the benefit of at least outline planning permission. The eastern part (376 dwellings) has full permission and is mostly built out. All of the remaining part has outline permission and part of that western area recently gained full permission for 360 dwellings, and development on site has now started.

More details on these sites can be found in the Housing Implementation Strategy End of Year monitoring report (HOU11).

2.1.3 Importantly the sum-total of the NRDA requirement for Daventry District relates to the sum-total of the sites allocated in the WNJCS, listed above. The plan intends to support the delivery of the sites identified above however there is no requirement for the plan to support the delivery of any additional sites to make up the shortfall resulting from a lower than anticipated rate of delivery. As confirmed in the NRDA Background Paper (GEN03) and supported by the Statement of Common Ground, being signed by the Local Authorities, any approach to provide additional sites in this plan is not considered to be consistent with the WNJCS and is a matter for a review of the WNJCS where different spatial options and reasonable alternatives can be considered in the context of West Northamptonshire as a whole.

**2. *Is the housing trajectory in the Plan realistic? Does it demonstrate a supply of deliverable sites and developable sites that would meet the JCS housing requirement for Daventry District?***

2.2.1 In the rural areas, there are essentially three components to the trajectory:

- planning permissions
- windfalls and
- allocations in neighbourhood plans.

2.2.2 The sites with planning permission are broken down into two categories in the HLA report (HOU10). Sites of 15 units and more and sites of the less than 15 units.

2.2.3 Sites for less than 15 units are expected to be built out over the next five years, given their scale they are relatively easy to bring forward, and historically have been so. An allowance is made in the trajectory for lapses. This is dealt with under question 7 below. The sites with planning permission for 15 units or more are all currently under development, and therefore it is possible to predict with a good degree of accuracy the rate at which they will be built out, there is at least no doubt that they will be built out. More detail on a site by site basis is provided in appendix 2 of the 2019 HLA.

2.2.4 Windfall sites are dealt with at question 6 below. Neighbourhood Plan sites are dealt with at question 8 below.

2.2.5 Through completions and commitments the rural requirement has already been exceeded by 630 dwellings. Looking solely at completions, there have been 2287 completions in the first eight years of the plan. There are ten years of the plan left, with only 73 further completions needed to achieve the plan requirement of 2,360. Of the sites with permission for 15 units or more, there are 396 expected completions, so these alone would exceed the requirement. In addition there are further permissions for 303 dwellings, a further 696 expected completions on windfall sites, and seven

completions on Neighbourhood Plan allocations. Factoring in a proportion of the district wide lapse rate for the rural areas (180) would mean the rural requirement would be exceeded by some 1149 units or 47%.

- 2.2.6 In the town the prediction of future completions is less precise. There are two sites which are underway, and future build-out of these is relatively straightforward. The other sites are less advanced in the planning system, and therefore there is less certainty about their build-out.
- 2.2.7 The Council has sought to liaise with promoters of sites to establish their anticipated build-out rates, and confirm these through Statements of Common Ground. These have been informed by the promoters/developers own knowledge of their sites and market, but also the actual evidence of high levels of completions on the Monksmoor site in the town by one developer, with two outlets.
- 2.2.8 Statements of Common Ground are currently being prepared with promoters of the following sites which confirm that the sites are deliverable as per the housing trajectory;
- Daventry North East
  - Daventry South West (HO1)
  - Daventry Micklewell Park and Extension (HO2)

**3. *Is more recent monitoring information now available and does this alter the actual or forecast completion rate of dwellings against the expectations of the JCS?***

- 2.3.1 Information for the District outside of the NRDA is now available as at 1<sup>st</sup> April 2019 in the 2019 Housing Land Availability Report (HOU10). This can also be seen in the modified trajectory set out in the version 2 of the proposed schedule or minor modifications (PSD12).
- 2.3.2 In respect of the rural areas there is very little change in terms of overall expectations. More permissions have been granted, predominantly for small sites, some of which would have been accounted for in the windfall sites category in the 2018 HLA report. It is noted above that completions will readily exceed the WNJCS requirement, and that is still the case.
- 2.3.3 In the town, the modified trajectory makes some revisions to expected build out rates on sites in the town, some negatively and some positively. Overall the number of completions is expected to be lower than was assumed in the 2018 HLA Report which formed the basis of the trajectory in the submitted plan. This is largely because of further slippage of Daventry North East which reduces the anticipated completions at 2029 to 8,436 from 8,544. However anticipated rates from windfalls have increased slightly and some further consents have been made at Daventry town, including at site

H04.

2.3.4 Overall, the housing requirement is expected to be exceeded by 1591 dwellings, or 23%, which demonstrates that there is significant flexibility meet identified requirements in the district

2.3.5 Monitoring of the NRDA is available in the Housing Implementation Strategy End of Year monitoring report (HOU11). The Five Year Land Supply Report for the NRDA is produced by Northampton Borough Council, assisted by DDC and South Northamptonshire council, and the 1<sup>st</sup> April 2019 version is not available yet. The Council will update the Inspector during the hearing sessions as to the availability of this document.

**4. *Is there a sufficient range and choice of sites allocated in the Plan in terms of location, type and size, to provide adequate flexibility to meet the JCS housing requirement for Daventry District? Would the housing allocations ensure that the Plan would be consistent with the Framework, in so far as it seeks to boost significantly the supply of housing?***

2.4.1 The housing requirement as set out in the WNJCS was found to be sound, i.e. it was consistent with the framework in so far as it seeks to boost significantly the supply of housing.

2.4.2 Across the district, outside of the NRDA, delivery has either met or exceeded the WNJCS requirement every year of the plan period. The cumulative total is now well in excess of what the WNJCS requires by this point in the plan period as shown in the modified trajectory, where the requirement has been exceeded by 310 dwellings (as at 31<sup>st</sup> March 2019).

2.4.3 As noted in the response to question 2, the requirement for the rural areas has been considerably exceeded through completions and commitments and almost been met already looking solely at completions, with ten years of the plan still to run. As can be seen in the modified trajectory, during the plan period there has been delivery on sites of varying sizes and in different locations which have helped to achieve this delivery, and some of that delivery is still in the pipeline.

2.4.4 At the town, there is a wide range of site sizes and locations available, through a combination of permissions, and allocations in the WNJCS and the submission part 2 local plan.

These include:

With permission;

- 10 units edge of the town centre:
- 139 units at the Northampton College,

- 450 units at Micklewell Park, and
- 59 units and 307 units at Middlemore (HO4)

Allocated;

- 70 and 80 units at Micklewell Park (HO2),
- 1,100 at Daventry South west (HO1) and
- 4,000 at Daventry North East (which could possibly come forward in smaller parcels).

2.4.5 As shown on the modified trajectory the requirement of 6980 dwellings is anticipated to be exceeded by 1591 dwellings, 23% which demonstrates that there is significant flexibility meet identified requirements in the district.

2.4.6 The response to question 1 above sets out the position of the sites allocated that form the basis of the NRDA provision.

**5. *Are the sites that are relied upon for the supply of housing in rural areas - deliverable and/or developable? What evidence is there to support this?***

2.5.1 Please see the response to question 2.

**6. *Is the expected contribution from windfalls, as included in the housing trajectory for both Daventry Town and rural areas, realistic and justified by evidence?***

2.6.1 This is dealt with in some detail in section 3 of the 2019 HLA Report (HOU10). In summary, the report looks at historic rates since 2001, and then identifies the reasons why windfall rates are expected to continue to make a contribution. It shows a consistent supply of windfall sites over at least the last 10 years, 106 units on average per annum.

**7. *Is it appropriate to apply a lapse rate of 20 dwellings per annum from 2018/19 onwards as set out in the housing trajectory for planning permissions or neighbourhood plan allocations in rural areas? Is such an approach justified by evidence?***

2.7.1 This is dealt with in some detail in section 4 of the 2019 HLA Report (HOU10). The future rate is based on monitoring of lapsed permissions over recent years, it is therefore more reliable than an arbitrary percentage. It relates to both Daventry town and the rural areas. Sites of 15 or more units are assessed on an individual basis and assumptions made about delivery, it is therefore not appropriate to apply a lapse rate to these.

2.7.2 The trajectory assumes completions of only seven dwellings from Neighbourhood allocations, so these numbers are insignificant in the scale of what is provided for in the plan period.

**8. *Are the neighbourhood plan allocations that are identified in the housing trajectory consistent with those within made neighbourhood plans? If not, what certainty is there that any further allocations will be part of a made neighbourhood plan?***

2.8.1 The trajectory assumes completions of only seven dwellings from Neighbourhood plan allocations, and the Neighbourhood Plan does not make any assumptions about when they will be delivered. The numbers are of little consequence to the overall scale of what is being provided for in the plan period.

**9. *What contingencies are in place should housing delivery fall below expectations within the housing site allocations in Daventry Town, the rural areas and/or in the NRDA in Daventry District? Would it be necessary to consider other areas for development?***

2.9.1 In respect of the Rural Areas, as noted in response to question 2 above, actual delivery in the rural areas is significantly ahead of expectations, with only a further 73 dwellings needed to achieve the requirement, and ten years of the plan still to run. This together with further permissions significantly exceed the rural requirement and it is inconceivable that this requirement will not be met.

2.9.2 In respect of Daventry town, as noted above, the plan and permissions provide for a wide range of site sizes and locations, which help in making their build out attractive to developers and purchasers. The plan provides for 307 more dwellings than is required in the WNJCS. Consideration also needs to be given to the fact that it is expected that 1149 more dwellings will be built in the rural areas than the plan requirement, whilst the Council does not advocate significant further development above this as a means of redressing any deficiencies in the town, existing expected overprovision would, numerically, offset any shortfalls in the town.

2.9.3 With respect of the NRDA, this is set out in response to Matter 1 and Matter 2 and question 1 above.

**10. *Are the approaches to self-build and custom housebuilding in Policy HO5, rural workers dwellings in Policy HO6 and rural exception site selection in Policy HO7, justified, effective and consistent with national policy?***

2.10.1 Policy HO5 seeks to ensure that individually designed houses on multi plot developments are designed such that they do not stifle development on neighbouring plots and that it is suitably designed to ensure it is well integrated into the surrounding area whilst allowing for variation in design.

2.10.2 The Council maintains a custom and self build register (HOU12), but this has not



identified any significant interest in these products. As at 31<sup>st</sup> October 2018, 20 people had been added to the register and 75 planning permissions had been granted. Therefore the Council is readily discharging its duty to grant sufficient planning permissions.

2.10.3 Policy HO6 is consistent with paragraph 55 which seeks to avoid isolated homes in the countryside except in exceptional circumstances which includes rural workers.

2.10.4 Policy HO7 gives priority to locating new exceptions schemes development in locations which are more sustainable.

**11. *Is Policy HO8 justified and consistent with national policy, with respect to the specific requirements relating to market housing, affordable housing, housing standards and specialist accommodation?***

2.11.1 Policy HO8, Housing Mix and Type has been based on the evidence identified in the Housing Market Evidence 2017 study (section 3, HOU04) which was completed to support the preparation of the Part 2 Local Plan and provide further detail of housing needs based on the Objectively Assessed Needs (OAN) for West Northamptonshire (as set out within the WNJCS). The key requirement from formulating this study was to identify a robust affordable housing needs figure, and identify a clear understanding of specific housing needs, as required by the NPPF. This study was commissioned by the WNJPU and carried out by Opinion Research Services (ORS).

2.11.2 The WNJPU Housing Market Evidence (2017) and further verification that has led to Policy HO8 has been brought together as a Housing Background Paper (HOU1, 2018). This paper includes the evidence as gathered during the ORS study on housing mix as well as detailed examination of the specific requirements relating to housing standards and specialist accommodation (HOU01, 2018, para. 5.22-5.38).

2.11.3 An analysis of the need for market and affordable housing is contained within the evidence base and uses the criteria set out in Planning Practice Guidance in order to calculate the need (summarised in para. 5.20 of HOU01, 2018).

2.11.4 Local Planning authorities can set additional technical housing standards, DDC's Housing Background Paper (HOU01, 2018) supports that there is sufficient evidence to justify the application of these standards which helps to meet the identified needs in accordance with national policy (NPPF para. 50), particularly regarding space.

2.11.5 In response to issues raised at consultation stage of the emerging Plan related to space, a study was undertaken which sampled permitted or recently built properties between 2012 and 2018. This case study reviewed 16 developments of varying size (from 11 properties to 200), to determine how they perform against the nationally described space standards on gross internal floor area (GIA), the summary and findings are contained within paragraph 5.36 of the Housing Background Paper (HOU1, 2018). All

of the sites together totaled 1300 units of accommodation. Over 200 property types were assessed of which 77 (33%) were affordable property types and 154 (67%) were market housing property types. The results of this case study found that the majority of large property types exceeded the nationally described space standards, and 2 and 3 bedroom properties did not. Of those 2 and 3 bedroom property types that did not meet the standard 32% were market housing, making the largest percentage (68%) of properties that did not meet the standard affordable housing property types. A full table of the results is contained within Appendix 1 of the Housing Background Paper, and is summarised within para. 5.36 (HOU01, 2018). There is further justification for the application of the national space standards given that HO8 requires the majority of houses to be either two or three bedroom properties.

2.11.6 Policy HO8 is justified and consistent with national policy as it is built on a robust evidence base ensuring that the Plan meets the full objectively assessed need (NPPF, para. 47), it responds suitably to the Districts identified demands in that it caters for current and future forecast of needs as well as contributing to the creation of sustainable mixed and inclusive communities by seeking to provide for the needs of different cohorts (NPPF, para. 159).

**12. *Is there any evidence that any of the policy requirements in Policy HO8 would affect the viability or deliverability of housing sites? Is the policy sufficiently flexible? Would it allow for specific circumstances, including viability, to be taken into account?***

2.12.1 DDC commissioned Peter Brett Associates to undertake a Daventry Local Plan (Part 2) Viability Assessment (GEN01, 2017), which confirms that Policy HO8 will not make development unviable.

2.12.2 Policy HO8 provides detail of the required mix based on the evidence as contained within the WNJPU Housing Market Evidence (HOU04, section 3, 2017). The policy supports proposals where the mix is 'largely reflected', therefore allowing flexibility in the mix of houses that comes forward whilst still ensuring that the needs are likely to be met. This additional flexibility (through including the word 'largely') was included in the Proposed Submission plan specifically in response to objections received to the emerging draft plan and to respond to the recommendations of the viability study (GEN01, 2017) The Council recognises that it may not be possible to meet the recommended mix on all sites; therefore the policy also provides the opportunity for an exception where sites are demonstrated to be unviable through a 'robust assessment of needs at an appropriate local level' which therefore can allow for specific circumstances to be taken into account.

2.12.3 The lack of flexibility was identified as an issue by a number of representors PSO44/06, PSO45/06, PSO52/03, PSO56/08, PSO57/09, PSO58/09, PSO62/11, PSO84/09, PSO87/12, PSO92/07. The issues raised have been resolved in PSD11 and in response the question above.

**13. *Are the recommendations of the viability assessment (GEN01) reflected in the Plan?***

- 2.13.1 The viability assessment (GEN01) concluded (page 38, para 6.3.2,) that solely based on the viability testing the evidence would suggest that the Emerging Draft Local plan (Part 2) policy requirements may need to provide some flexibility to ensure a fully deliverable plan. This could include either a specific policy to enable a consistent approach to be applied to introduce flexibility in on-site and off-site developer contributions but also further flexibility to policies to reduce affordable housing levels and/or thresholds and accessibility standards. However the viability study also recognised that the level of flexibility should depend on the sites coming forward (page 39, para 6.3.3) and that as the results of the assessment show only brownfield sites potentially not achieving commercial viability and the plan is not reliant on these coming forward for residential development then any requirement for flexibility may be limited or not needed.
- 2.13.2 The study also concluded that HO1 and HO2 would come forward in compliance with policies but that there was little headroom for HO1 to apply further cumulative policies. However it also acknowledged that with lower than average build costs (more likely to reflect the actual costs by a large housebuilder) could mean that delivery of this site could occur without policy intervention or external support.
- 2.13.3 In the context of these recommendations it was not considered that extensive changes to the policies were required. However an important change was made to policy HO8 to provide additional flexibility in that the mix of house types should 'broadly reflect' the mix identified in the policy for market and affordable housing.
- 2.13.4 Regarding sites HO1 and HO2, the Statements of Common Ground are in the course of preparation which will confirm the sites are deliverable and also help reinforce that the policies in the plan are deliverable.
- 2.13.5 As confirmed in response to Matter 8 (Q4) the NRDA standards in policy CW2 have been assessed through the addendum to the viability report (GEN01-A).

**14. *In overall terms, would the Plan realistically deliver the dwellings required over the plan period by the JCS?***

- 2.14.1 Yes, for the reasons stated above, responses to question 2, and as evidenced in the 2019 HLA (HOU10), modified trajectory, statements of common ground and background papers. The following table provides a useful overview of the numbers. It is important to note that this covers different policy areas, to which different five year land supply calculations relate.

Policy area	Policy Requirement in WNJCS Policy S3	Expected Completions as at 2029	Difference
Rural Areas	2,360	*3,509	+1149
Daventry town	4,620	**5,067	+447
Total DDC requirement	6,980	8,576	***+1596
NRDA	5,750	5,020	-730
Total	12,730	13,596	+866

\*figure includes an allowance for lapses (180 units)

\*\*figure includes an allowance for lapses (20 units)

\*\*\*Please note difference of 5 to figure in trajectory – this relates to a difference in the WNJCS policy requirement of 6980 and the sum total of the WNJCS trajectory requirement of 6,985

## Response of Daventry District Council to the specific issues and questions relating to Matter 3- Issue 2

***Whether the proposed allocation of sites and site selection accords with the JCS and is consistent with national policy.***

### **Questions**

**1. *Was the methodology used to assess and select the proposed site allocations appropriate? Were reasonable alternatives considered and tested?***

3.1.1 The WNJCS (WNJCS01) is a Part 1 Plan which sets out the spatial strategy for the District, as detailed in Policy S1 'Distribution of Development', Policy S2 'Hierarchy of Centres' and Policy S3 'Scale and Distribution of Housing Development'. This policy identifies how housing development will be distributed between Daventry town, the rural areas and the NRDA.

3.1.2 The Site Selection Background paper (GEN05) explains the process undertaken to clearly illustrate the reasons why sites have been selected to be allocated for residential and employment uses in the Settlements and Countryside Local Plan Part 2. Section 5 sets out the relevant evidence base that informs the selection of sites. This includes the Sustainability Appraisal (PSD03 & PSD04), Daventry Housing and Economic Land availability Assessment (HELAA1-3), OPUN Review (HOU02) and the West Northamptonshire Strategic Flood Risk Assessment (WFR01-05). Crucially it notes that as the rural housing requirement has been exceeded the plan does not propose to make any further allocations in the rural area. Similarly there is also no need to make further allocations for employment use in the rural areas. As a result the starting point of site selection for residential and employment focusses solely on Daventry Town.

3.1.3 Section 6 of the Site Selection paper sets out the process undertaken. Para 6.3 identifies the principal source of sites from 'call for sites' exercise forming a ring round Daventry town. To ensure complete coverage around the perimeter of the town sites assessed for the WNJCS were also included. Para 6.5 – 6.7 and Figure 1 (page 20) detail the 5 stage flow chart illustrate the process undertaken for site selection following initial assessments through the HELAA process (Stage 1&2). All sites identified in the HELAA or SA were assessed, this included 249 sites across the District for residential and 23 sites for employment. Stage 1 sites subject to constraint identified in the HELAA methodology were assessed as SA alternatives only and did not carry forward. At Stage 2 sites without constraint were assessed to establish if they were deliverable and developable. Those that were not, were assessed as alternatives in the SA and did not proceed further, those that did were to be assessed at Stage 3.

3.1.4 All sites that proceeded to Stage 3 underwent technical assessment (e.g. SFRA). If sites need further assessment beyond technical work, an OPUN Review (HOU02) panel was undertaken. This concluded that for Daventry South East site (Stage 3a) it was

considered that the site was not considered appropriate for residential following an objection from Historic England. Additional site assessments were made for alternative sites. These included Daventry South West and Daventry North which were subject to the OPUN Review, with Daventry South West proceeding to Stage 4, which proposed the sites for allocation. Stage 5 sites proposed for allocation following representations on the plan as well as heritage impact assessment and strategic transport assessment.

3.1.5 All reasonable alternatives have also been considered and assessed. As detailed above a large number of sites were considered in the initial assessment. Where they were identified as not being deliverable or developable within the plan period they were assessed in the SA as the reasonable alternatives. Part 3A of the Sustainability Appraisal (PSD03) tests the reasonable alternative options for the Local Plan and in doing so identifies and evaluates their sustainability effects. Table 2.1 (Pg. 4 -7) details the reasonable alternatives identified, the reason for approach to selection of alternatives and the reason for selecting the preferred approach.

3.1.6 Section 3 of Part 3A (PSD03) assess the reasonable site options and are divided into assessment of 6 Daventry central area sites, assessment of 4 spatial approaches for Daventry town housing and the assessment of large number of housing and employment opportunities. Table 3.1a, 3.1.b and 3.1.c (Pg. 21 – 37) also details reason for selecting alternatives. This includes the reasonable alternatives identified, the reason for approach to selection of alternatives and the reason for selecting the preferred approach. The full results are shown in Annex B (page 21) and Individual Site assessments are found pages 38 – 209.

**2. *Are the reasons for selecting the preferred sites and rejecting alternative sites, clear and consistent? Is there a reason why sites where the SA identified significant negative effects such as Daventry South West (HO1) were selected, whereas others were not?***

3.2.1 The Site Selection Background Paper (GEN05) Table 1 (Pg. 24-27) and Map (Pg.28) sets out what stage which each site reached in the assessment and the reasoning behind this. Appendix A of the background paper (Pg 29 – 51) sets out a summary of each site that has reached at least stage 3 of the site selection process – i.e. those that warrant further technical assessment. It identifies the issues raised from the HELAA, SA, SFRA and water and waste infrastructure and landscape assessments. The assessments indicate if it is appropriate for the site to be allocated for the emerging draft part 2 local plan (stage 4). The final stage 5 concludes whether to allocate each site after considering the implications of consultation, the heritage impact assessments and strategic transport assessment.

3.2.2 As stated above Appendix A clearly sets out the assessment of all the sites and explains how each site progressed through the stages and the reasoning behind the progression Table 1 identifies the significant negative effects for each site as assessed in the SA. It

is clear that all the sites of sufficient capacity to deliver sustainable development around Daventry town had some form of significant negative effect.

- 3.2.3 Three sites of a strategic scale were essentially considered and in recognition of the constraints that apply to them each of them were subject to the OPUN review.
- 3.2.4 Daventry South East –Site 312 (Pg 40 – 41) was initially considered to be the site that could form a sustainable extension to Daventry. The Site Selection Background Paper sets out the conclusion of each stage of the assessment and explains why the site was ultimately rejected. The land at Daventry South East presented significant challenges that limited its capacity. If allocated there was a need to balance the landscape considerations, the setting and the location of the scheduled monuments and the topography. In addition to this there was an objection from Historic England which is supported by correspondence with Historic England Appendix B (Pg 52 -56).
- 3.2.5 It was considered at Stage 3a, that it would not be appropriate to pursue the entirety of the Daventry South East due to the objections from Historic England and the need to mitigate the impact that would significantly reduce the site capacity. Part of the consideration was that other sites were available, that although they had constraints, they were not considered to be of the same weight.
- 3.2.6 Following consideration of Daventry South East, both Daventry North (321 pg 43-45) and Daventry South-west Site 322 (Pg 46 – 47) were considered. The Site Selection Background Paper sets out the conclusion of each stage of the assessment. As with Daventry South East, Daventry South West has constraints with landscape constraints the most significant negative impact that would require mitigation, and these are set out in the policy. Although the landscape was assessed to have a low capacity to accommodate change it was considered that it did not substantially affect the capacity of the site particularly compared to Daventry South East and Daventry North (which both had significant heritage constraints that would affect suitability and capacity). In light of this, the conclusion notes that in comparison with alternative sites, this site presents the most sustainable option for significant expansion for the town.

**3. *Have any potential effects of the proposed site allocations on the predicted annual delivery rate of housing at the Daventry North East Sustainable Urban Extension (JCS allocation) and/or the NRDA been adequately considered? What is the current situation with respect to those sites allocated in the JCS?***

- 3.3.1 No evidence has been produced by interested parties to suggest that delivery of Daventry North East or the NRDA sites would be adversely affected. The NPPF is clear that Local Planning Authorities should ensure choice and competition in the market for land and the additional allocations have been made with this in mind.

- 3.3.2 Fundamentally there is a need to ensure the WNJCS requirements for Daventry town are met which requires additional allocations to meet the requirement of about 4,620 dwellings i.e. to deliver the strategy and to ensure a 5 year housing land supply is maintained. Importantly the WNJCS and the annual growth to meet this need identified in the housing trajectory (page 228) was considered to be deliverable through the examination of that plan and no significant circumstances have changed. Moreover, since the adoption of the WNJCS in December 2014 the level of completions have increased alongside the WNJCS and this has included an uplift in completions at Daventry town, from 124 in 2014/15 to 207 dwellings in 2018/19.
- 3.3.3 The response to Question 1 sets out progress of the NRDA sites. The 2019 HLA report (HOU10) sets out progress of Daventry North East compared to what was anticipated when the WNJCS was adopted.

*The Council is requested to address the following questions for each of the proposed allocations and related policies; HO1 - Daventry South West, HO2 – Daventry, Micklewell Park Extension, HO3 - Daventry, Micklewell Park and HO4 - Daventry, Land at Middlemore. For those sites where representations have been made the Council is requested to respond to the particular issues raised. In doing this any updated information regarding planning permissions, sites under construction and existing uses should be included.*

#### **HO1- Daventry South West**

**4. *Are the proposed housing site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts? Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery?***

- 3.4.1 As set out in the Site Selection Background Paper (site ref 322), based on the HELAA assessment followed by the OPUN review and also supported by the findings of the SA and other technical assessment, site HO1 is considered to be in a suitable location for residential development and adverse impacts can be adequately mitigated, particularly when compared to the other sites that were considered through the production of the plan. As confirmed in the Site Selection Background Paper and in response to Question 2 above it is acknowledged that the SA identified significant negative effects (relating to landscape and townscape and soil and geology) and the former was also reflected in the landscape assessment of the site. However as set out in GEN05 it was considered that the negative effects of the site could be mitigated. This mitigation has also been identified in the policy (criterion vi) which clearly recognises the need to mitigate the landscape impact and retention of important existing landscape features. The OPUN review also recognised that access to the site was a constraint however this has been addressed through the policy requirements which will include access via the A45, improvements to the existing footbridge and an at-grade crossing.



3.4.2 It is not considered that there is any risk that these infrastructure requirements might prevent or delay development and adversely affect viability and delivery. This will be confirmed through the Statement of Common Ground being produced which will further confirm the site is deliverable.

**5. *Are the site boundaries correctly defined?***

3.5.1 The site boundary of HO1 is correctly defined on the policies inset map (page 10).

**6. *Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what is this based on?***

3.6.1 The site capacity has been calculated based the approach set out in the HELAA (HELAA2 – page 15) which was considered appropriate through consultation undertaken. This applies a density of 35dph and a gross to net development ratio of 60% (site is over 2 hectares). The site is 53.83 hectares, at 35dph this equates to 1884 dwellings, 60% of which equates to 1130 dwellings. The allocation of about 1100 dwellings reflects this capacity but also initial masterplanning of the site taking into account the need to meet the various policy requirements.

**7. *What is the expected timescale for development in terms of lead in times and annual delivery rates, are these assumptions realistic and supported by evidence?***

3.7.1 The proposed timescales for development will be set out in the SoCG that will be signed between all relevant parties. These will largely reflect the timescales set out in the 2019 HLA Report and are also set out in the modified trajectory provided in version 2 of the proposed minor modifications document. These assumptions are considered to be credible and realistic.

**8. *How do the proposed housing allocations help to ensure a built environment that meets the needs of all sections of the community?***

3.8.1 Site HO1 is of a sufficient scale to provide a range of services and facilities, including a primary school and local centre, to provide for prospective residents. The site will also provide access to a network of green infrastructure and existing sports facilities for leisure and recreation purposes. Prospective residents will also be able to access the services and facilities around Daventry town centre, and nearby employment opportunities, without relying on the private car. Furthermore given its sustainable location existing residents in Daventry will also benefit from access to these on-site services and facilities.

3.8.2 The site will also meet the housing needs of policy HO8 and provide a policy compliant level of affordable housing.

**9. *Has the SA adequately assessed the housing allocations against relevant environmental, social and economic objectives? Can suitable mitigation measures be achieved in order to address any potential adverse effects identified? Are these assumptions realistic?***

- 3.9.1 Section 3, Part 1 Pg.7 of the SA (PSD03) sets out the methodology used for the sustainability appraisal of the Part 2 Local Plan. The first stage sets out the scope and develops the SA framework. The different elements of the local plan are then assessed against the framework using an appraisal matrix to assess the effects (Table 3.3, Part 1, Pg 11).
- 3.9.2 Every site option identified in Part 3a of the SA has been assessed against the 14 objectives of the SA framework). The full results for all sites can be found in Appendix 1, Part 3A. Each site assessment includes the SA objective, the likely sustainable effect and a summary of the evidence. Potential mitigation and enhancement are also included and are considered to be realistic given the information available at the time.
- 3.9.3 The results for the SA assessment of site allocation HO1 Daventry South West can be found at Site 202 (322), Page 100 -106 Appendix 1, Part 3A (PSD03 and PSD04). Part 3B of the SA outlines the results of the appraisal of the preferred options. Page 3 of Table 2.1 identifies the significant and uncertain effects and identified mitigation and Table 3B (6), identifies the SA objective, sustainability effect and provides a commentary and comparison of options for HO1. Mitigation measures are identified for those criteria that have a minor negative effect (air quality and noise, archaeological and cultural heritage, biodiversity, flora and fauna) or significant negative effect (landscape and townscape and soil, geology and land use). Where negative effects have been identified Policy HO1 responds to this through specific criteria relating to landscape and the requirement of any development of the site to be informed by assessments and suitable mitigation relating to archaeological, heritage, landscape and visual and ecological impacts.
- 3.9.4 The SA Addendum July 2018 (PSD04) outlines the changes to the results of the SA which have occurred due to local plan changes. The boundary of HO1 was extended at proposed submission stage and this required reassessment as there was a potential change to the effects of the local plan. Appendix B (Pg 51 – 57 for HO1) of the Addendum sets out the full assessment (using the same methodology previously outlined). The assessment found that none of the changes would cause the significant effects of the Local Plan to change.

**10. Are the proposed housing allocations and the associated development requirements and principles in the related policy, including any necessity for master planning, – justified, effective and consistent with national policy?**

3.10.1 As set out in the responses above, site HO1 is clearly justified and necessary to deliver the strategy in the WNJCS. This is supported by the site selection process including the outcomes of the Sustainability Appraisal and the OPUN Review (HOU02). It is acknowledged that there will be impacts arising from the development but these can be mitigated through the principles in the policy, which are necessary. Master-planning of the site is necessary, particularly given its scale and that it is controlled by two landowners.

3.10.2 The above ensures the site is consistent with national policy, contributes to the achievement of sustainable development, ensure a choice and competition in the market and enables the District Council to maintain a 5 year land supply.

3.10.3 Representations were received from the following respondents in relation to Policy HO1 - PS001/01, PS034/01, PS052/02, PSO56/07, PS057/08, PS062/03, PS075/04, PS026/01. These have been addressed in document PSD11 and in responses in this statement and to matter 2 (particularly in relation to further allocations being necessary in the rural area). In summary it is considered that crucially the site is necessary to deliver the spatial strategy and housing requirements established in the WNJCS, helps to provide additional flexibility and is in a sustainable location particularly relative to other sites that were considered. The issues raised in respect of infrastructure (PS034 and PS107) have been addressed through updates to the Infrastructure Schedule. The changes to policy wording suggested by PS075 relating to infrastructure have been accepted, previously accepted as a minor modification (as indicated in the emerging SoCG) this is now set out in the schedule of potential main modifications (PMM03).

**HO2 – Daventry, Micklewell Park Extension,**

**4. Are the proposed housing site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts? Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery?**

4.4.1 As set out in the site selection background paper (site ref 134), based on the HELAA assessment and also supported by the findings of the SA and other technical assessment, site HO2 is considered to be in a suitable location for residential development, directly adjacent to an existing permitted site, and the SA identified no significant adverse impacts but identified some minor negative impacts. However as set out in GEN05 it was considered that the negative effects of the site could be

mitigated. This mitigation has also been identified in the policy (criterion vi) which clearly recognises the need to mitigate the landscape impact and retention of important existing landscape features.

4.4.2 It is not considered that there is any risk that these infrastructure requirements might prevent or delay development and adversely affect viability and delivery. This will be confirmed through the Statement of Common Ground signed by all parties which will further confirm the site is deliverable, within a single land ownership albeit with different promoters involved.

**5. *Are the site boundaries correctly defined?***

4.5.1 The site boundary of HO2 is correctly defined on the policies inset map (page 11).

**6. *Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what is this based on?***

4.6.1 The site capacity has been calculated based the approach set out in the HELAA (HELAA2 – page 15) which was considered appropriate through consultation undertaken. This applies a density of 35dph and a gross to net development ratio of 60% (site is over 2 hectares). The site is 13.66 hectares, at 35dph this equates to 478 dwellings, 60% of which equates to 286 dwellings. The allocation of about 250 dwellings reflects this capacity but also initial masterplanning of the site taking into account the need to meet the various policy requirements.

**7. *What is the expected timescale for development in terms of lead in times and annual delivery rates, are these assumptions realistic and supported by evidence?***

4.7.1 The proposed timescales for development will be set out in the Statement of Common Ground signed between all parties. These will largely reflect the timescales set out in the 2019 HLA Report and are also set out in the modified trajectory provided in version 2 of the proposed minor modifications document (PSD12). These assumptions are considered to be credible and realistic.

**8. *How do the proposed housing allocations help to ensure a built environment that meets the needs of all sections of the community?***

4.8.1 Prospective residents of site HO2 will be access to a network of green infrastructure for leisure and recreation purposes and be able to access the existing services and facilities within the consented Micklewell park scheme. Prospective residents will also be able to access the services and facilities around Daventry town centre through access to a regular bus service and improved cycle/pedestrian connections delivered by the existing Micklewell park scheme.

4.8.2 The site will also meet the housing needs of policy HO8 and provide a policy compliant level of affordable housing.

**9. *Has the SA adequately assessed the housing allocations against relevant environmental, social and economic objectives? Can suitable mitigation measures be achieved in order to address any potential adverse effects identified? Are these assumptions realistic?***

4.9.1 The results for the SA assessment of site allocation HO2 Daventry, Micklewell Park Extension can be found at Site 303 on Pages 158 - 166 Appendix 1, Part 3A (PSD03 and PSD04). Part 3B of the SA outlines the results of the appraisal of the preferred options. Part 3B of the SA outlines the results of the appraisal of the preferred options. Page 3 of Table 2.1 identifies the significant and uncertain effects and identified mitigation and Table 3B (7), the SA objective, sustainability effect and commentary and comparison of options for site HO2. Mitigation measures are identified for those criteria that have minor negative effect (air quality and noise, archaeological and cultural heritage, biodiversity, flora and fauna, soil, geology and land use and landscape and townscape). Where negative effects have been identified Policy HO2 responds to this through specific criterion relating to landscape and the requirement of development of the site to be informed by assessments and suitable mitigation relating to archaeological, heritage, landscape, visual and ecological impacts.

4.9.2 The SA Addendum July 2018 (PSD04) outlines the changes to the results of the SA which have occurred due to changes to the part 2 Local Plan. The boundary of HO2 was extended at proposed submission stage to include the farmstead which required reassessment as there was a potential change to the effects of the local plan. Appendix B (Pg 58 – 64 for HO2) of the Addendum sets out the full assessment (using the same methodology previously outlined). The assessment found that none of the changes would cause the significant effects of the Local Plan to change.

**10. *Are the proposed housing allocations and the associated development requirements and principles in the related policy, including any necessity for master planning, – justified, effective and consistent with national policy?***

4.10.1 As set out in the responses above, site HO2 is clearly justified and necessary to deliver the strategy in the WNJCS. This is supported by the site selection process including the outcomes of the Sustainability Appraisal. It is acknowledged that there will be impacts arising from the development but these can be mitigated through the principles in the policy, which are necessary. Master-planning of the site is necessary, particularly to ensure the site integrates well with the consented Micklewell park scheme that will provide access to a local centre and primary school for its residents and whilst it is in single-ownership the site is promoted by two different promoters.

4.10.2 The above ensures the site is consistent with national policy, contributes to the achievement of sustainable development, ensures a choice and competition in the market and enables the District Council to maintain a 5 year land supply.

4.10.3 Representations were received from the following respondents in relation to Policy HO2 – PS037/02, PS062/03, PS095/01, PS024/01, PS078/01. These have been addressed in document PSD11, however it is considered that crucially the site is necessary to deliver the spatial strategy and housing requirements in the WNJCS, helps to provide additional flexibility in meeting the housing requirements and is in a sustainable location particularly relative to other sites that were considered. The representation regarding the site coming forward as two allocations (PS037) is dealt with above in respect of master planning.

### ***HO3 - Daventry, Micklewell Park***

***4. Are the proposed housing site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts? Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery?***

5.4.1 The site is not proposed as an allocation but is intended to provide a series of development principles to inform development proposals and to safeguard against HO2 coming forward before the consented Micklewell Park scheme. Consequently it is not considered necessary to provide answers in relation to questions 6-10.

***5. Are the site boundaries correctly defined?***

5.5.1 The site boundary of policy HO3 is correctly defined on the policies inset map (page 11).

5.5.2 Representations were received from the following respondents in relation to Policy HO3 PS001/03, PS034/02, PS062/03, PS095/02. These representations have been addressed in document PSD11 and regarding the updates to the Infrastructure Schedule confirming the contributions from site HO2.

### ***HO4 - Daventry, Land at Middlemore.***

***4. Are the proposed housing site allocations appropriate and justified in the light of potential constraints, infrastructure requirements and adverse impacts? Is there any risk that any infrastructure requirements, site conditions and/or constraints might prevent or delay development or adversely affect viability and delivery?***

6.4.1 As set out in the Site Selection Background Paper (site ref 315), based on the HELAA assessment and supported by the SA and other technical assessment, site Ho4 is considered to be in a suitable location within an existing residential area an existing industrial area with no significant constraints or adverse impacts that would prohibit it

coming forward for development. Whilst located in close proximity to residential uses it is not considered that the deliverability would be affected and therefore the site is considered to be appropriate, justified and deliverable.

- 6.4.2 The site is owned by Daventry District Council and benefits from extant consent for a 59 dwelling affordable scheme (DA/2018/0388) on the northern most part of the site and a mixed tenure retirement community (DA/2016/1180 - 307 dwellings) on the southernmost portion of the site. These schemes came forward during the production of the plan however it was considered appropriate for the site to remain as an allocation as a fall-back position if either of the proposals on the site are not implemented. However the extant consents do further demonstrate the site is deliverable.

**5. *Are the site boundaries correctly defined?***

- 6.5.1 The site boundary is correctly defined as shown on the inset map (page 12)

**6. *Are the assumptions regarding the capacity of the sites in terms of density of development and net developable areas justified and what is this based on?***

- 6.6.1 The site capacity of the allocation has been calculated based the approach set out in the HELAA (HELAA2 – page 15) which was considered appropriate through consultation undertaken. This applies a density of 40 dph and a gross to net development ratio of 60% (site is over 2 hectares). The site is 5.3 hectares, at 40dph this equates to 212 dwellings, 60% of which equates to 127 dwellings. The allocation of at least 100 dwellings reflects this capacity. However as set out above this is a fall-back position if the consented schemes are not deliverable.

**7. *What is the expected timescale for development in terms of lead in times and annual delivery rates, are these assumptions realistic and supported by evidence?***

- 6.7.1 The delivery timescales are set out in the 2019 Housing Land Availability Report (HOU10). These are reflected in the modified housing trajectory. These are considered to be credible and reflect that both parts of the allocation benefit from planning permission.

**8. *How do the proposed housing allocations help to ensure a built environment that meets the needs of all sections of the community?***

- 6.8.1 The proposed allocation is located within an existing residential development with good links to nearby employment. It will therefore help provide a built environment that integrates well with Daventry. Notwithstanding this the consented scheme will also achieve these aims and provide a greater than policy compliant level of affordable

housing. The mixed-tenure retirement community will also provide specialist accommodation to help meet needs.

**9. *Has the SA adequately assessed the housing allocations against relevant environmental, social and economic objectives? Can suitable mitigation measures be achieved in order to address any potential adverse effects identified? Are these assumptions realistic?***

6.9.1 The results for the SA assessment of site allocation HO4 Daventry Land at Middlemore can be found at Site 315, Page 204 - 210 Appendix 1, Part 3A (PSD03 and PSD04). Part 3B of the SA outlines the results of the appraisal of the preferred options. Page 3 of Table 2.1 identifies the significant and uncertain effects and identified mitigation and Table 3B (8), the SA objective, sustainability effect and commentary and comparison of options for 'Land at Middlemore' Mitigation measures are identified for those criteria that have minor negative effect (air quality and noise). Suitable mitigation measures can be achieved, as demonstrated through the planning consents on the sites.

6.9.2 Para 3.8 of Part 1 of the SA (PSD04) sets out the assumptions made and difficulties encountered in the preparation of the SA. Para 3.8 states the SA "has been carried out and reported using an expert, judgement-led qualitative assessment. A 'precautionary approach' is taken especially with qualitative judgements. The SEA Regulations state that effects assessment should include assessment of secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects. At this strategic level the information is often not available to assess to this level of detail. However where there information is available on the likelihood of different types of impact this has been included in the results."

**10. *Are the proposed housing allocations and the associated development requirements and principles in the related policy, including any necessity for master planning, – justified, effective and consistent with national policy?***

6.10.1 As set out in the responses above, site HO4 is clearly justified and necessary to deliver the strategy in the WNJCS. The site already benefits from extant consent and the allocation is proposed as a fall-back position. The selection of the site as an allocation is supported by the site selection process including the outcomes of the Sustainability Appraisal. It is acknowledged that there will be impacts arising from the development but these can be mitigated through the principles in the policy. Master-planning of the site is not required given the relatively small scale of the proposal and the simplicity of bringing the site forward.



- 6.10.2 The above ensures the site is consistent with national policy, contributes to the achievement of sustainable development, ensures a choice and competition in the market and enables the District Council to maintain a 5 year land supply.
- 6.10.3 The only representation on this site (PS062) related to the need to provide further flexibility in land supply- this was addressed in the response in PSD11 and has been further addressed in the response to this statement.