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

Response by Daventry District Council

Matter 4: Employment and Economy

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 4 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.  

2. **Response of Daventry District Council to the specific issues and questions relating to Matter 4: Employment and Economy**

**Issue 1:**  
*Whether the policies seeking to support the regeneration of Daventry Town Centre and the distribution of main town centre uses are effective, justified, consistent with national policy and in general conformity with the JCS?*

**Questions**  
*In responding to these questions, the Council should identify and address specific concerns raised in representations.*

1. **Is the extent of Daventry Town Centre suitably defined in the Plan? Has the town centre boundary been extended as part of the Plan and if so, how and is such an approach justified?**

2.1.1 The Retail and Town Centre Background paper (EC02) along with the supporting text to policy EC1 explain how the Town Centre boundary was defined. This followed guidance in the NPPF through firstly defining Primary and Secondary Shopping frontages (shown in the Issues and Options consultation document, figure 3, page 24 – document ref FSD05) and then the Primary Shopping Area. The Town Centre boundary is subsequently defined on the basis of it containing the Primary Shopping Area and other areas of predominantly leisure, business and other main town centre uses.

2.1.2 The Town Centre boundary had not previously been formally defined through a development plan however the WNJCS (policy D2) recognised that the Part 2 Local Plan would need to define this area alongside the primary shopping area. It has therefore not been extended in this plan.

---

1 Local Plan Examination webpage: https://www.daventrydc.gov.uk/living/planning-policy/part-2-local-plan/local-plan-examination/
What is the evidence in terms of the additional capacity for retail and other main town centre uses in Daventry Town Centre and to what extent could the requirements set out in the JCS be accommodated within it through the implementation of Policies EC1 and EC2?

2.2.1 As noted in paragraphs 6.2-6.4 of the Retail and Town Centre Background Paper (ECO2), retail capacity has been assessed through reports undertaken in 2009, 2010 and 2012. The reports were commissioned by the WNJPU to support policies in the WNJCS.

2.2.2 The Council has produced documents to set out policies and strategies for the central area, including the town centre vision (produced in 2004) and the Daventry 2040 Masterplan produced in 2012 as set out in paras 6.5 to 6.19 of ECO2.

2.2.3 The Council has significant land ownership in and adjacent to the town centre, and in order to bring forward developments, informed by the various strategies/policies, has, for many years, been working with Henry Boots through a development partnership to deliver new retail floorspace, in and adjacent to the town centre.

2.2.4 As noted at para 6.10 of ECO2 a scheme for 9517m net tradable space on site 1 was granted planning permission in 2014. An application was also approved for convenience and non-food bulky goods on site 5 (para 6.14, ECO2). Shortly after the granting of these permissions, Henry Boot concluded, that with the rapidly changing retail environment, the schemes were not viable.

2.2.5 Henry Boot then proposed an alternative scheme for an edge of centre retail park, public house/restaurant and hotel on part of what is now allocated as EC3. This was granted permission in March 2018. In recent months, Henry Boot has concluded that the scheme is not viable. The agreement with Henry Boot is in the process of being terminated. In the context of the impending unitarisation of the local councils, a scheme is now being pursued to construct a cinema and restaurants on Site 1 (EC2) and work has recently commenced to deliver this.

2.2.6 These changes have occurred very late on in the plan making process, and it is apparent that the very different retail climate warrants a fresh assessment of retail capacity. This is clearly most effectively done at a larger geographic scale, and will be a component of the Joint Strategic Plan (Part 1) which will replace the WNJCS.

2.2.7 At a more local scale the Council has decided, in the light of the Henry Boot situation, to produce a new vision/strategy for the central area. Whilst this won’t be a development plan document it will provide a framework for decision making and investment decisions in the interim, until such time as the Part 1 plan can provide a new strategic context, and the subsequent part 2 local plan to that plan, can provide more detailed polices and allocations as necessary. A minor modification (MiMd24) is
proposed to the supporting text to set out the latest position in respect of this site.

3 What is the expected timescale for development in terms of lead in times and delivery, are these assumptions realistic and supported by evidence?

2.3.1 See response to question 2.

4 What is the basis for the definition of the primary shopping area and the associated criteria in Policy EC1? Would the additional requirements relating to main town centres in the primary shopping area be effective and are they justified? Is the Plan sufficiently clear in terms of what would constitute “over-dominance of non-retail use within a frontage”?

2.4.1 As set out in question 1 above the Primary Shopping Area was defined on the basis that it is where retail is concentrated and contains the Primary and Secondary shopping frontages.

2.4.2 The additional requirements relating to main town centre uses in the primary shopping area are justified, in recent years a number of shops (A1) have closed and been replaced by restaurants/cafes and this policy is seeking to respond to this. Furthermore the policy is justified in seeking to cater for the changing role of the town centre that is not solely reliant on A1 uses but in a manner that seeks to protect the role of the town centre but also provide some flexibility with an important safeguard to ensure that such uses should provide an active frontage to help ensure the retail ‘feel’ of the frontages is retained and the frontages remain animated by users. The criteria are also considered to be effective in this context. It is considered that criterion B (i) of EC1 when read alongside para 7.1.08 which refers to seeking to ensure the retail character and function is not eroded and continues to be the primary form of provision provides sufficient clarity, i.e. if a street were to no longer have retail as its primary form of provision then there would have been an over-dominance of non-retail use.

5 What is the intention of referring to primary shopping frontages and secondary frontages in the supporting text rather than Policy EC1? Is such an approach justified, effective and consistent with national policy?

2.5.1 The NPPF refers to local plans making a clear definition of primary and secondary frontages (para 23), these have been mapped and consulted on at the Issues and Options stage however they were not identified on the proposals map in the submission plan in error. The Background Paper (ECO2) indicates that they would be defined in the plan. The Council suggests that it is necessary to modify the town centre inset map to include the Primary and Secondary shopping frontages, defined as per the Issues and Options consultation document (FSD05). Furthermore to provide greater
clarity the Council suggest that criterion Bi could be modified, as a main modification, as follows;

i. Not result in the over-dominance of non-retail use within the primary shopping frontage (as defined on the Daventry Town Centre Inset Map);

2.5.2 The proposed modification is included in the schedule of potential main modifications (PMM04) and the modification to the Inset map is set out in Appendix 1.

6. Does the specific support for residential development within the town centre where it is above ground floor and with suitable access in Policy EC1, intend that other forms of residential development will be restricted? If so, is such an approach justified and consistent with national policy?

2.6.1 Residential development is not a main town centre use as defined in Annex 2 of the NPPF, therefore other forms of residential development within the town centre are not supported under criteria A and B of EC1. This is considered to be consistent with para 23 (bullet point 3) of the NPPF which requires policies to make clear which uses will be permitted and the need to pursue policies that support their viability and vitality. Furthermore such an approach is also considered to be justified in the context of a relatively small town centre.

2.6.2 Furthermore residential development is explicitly provided for under allocation EC3, an appropriate edge of centre location, which is consistent with para 23 (bullet point 9) of the NPPF.

7. Is the distribution of main town centre uses in Policy EC3 – Daventry, Land to the North and West of town centre, in an edge of centre location justified by evidence that suitable and viable town centre sites are otherwise not available? How does the allocation relate to the delivery of requirements set out in the JCS? Does the policy take appropriate account of circumstances relating to a planning permission recently granted on the Waterloo and Former Gas Works section of site allocation EC3?

2.7.1 There is very limited scope in the town centre for further development. This is evidenced in the recent sequential approach undertaken for the site 5 (part of EC3) application (DA/2017/0123), which the Council accepted. That sequential test looked at six sites, only two of which were sequentially preferable. Of those sites, one is currently being developed in part for a cinema and restaurants, as referred to in para 2.2.5 above, and the remainder is a town centre car park. The other site, Bowen Square, is not available for development.

2.7.2 Site EC3 is owned by the District Council, and is immediately adjacent to the town centre, therefore can provide for a mixed use development, consisting of predominantly residential, with some other uses as listed in the policy. It is not
envisaged that these would be of any scale that would undermine the town centres first approach, and as noted, there is little if any opportunity for these uses to be accommodated in the town centre in any case. The policy makes it clear that the site needs planning comprehensively through a masterplan, and this mechanism would enable the Council, as planning authority, to ensure that the uses complimented the town centre.
Response of Daventry District Council to the specific issues and questions relation to Matter 4 - Issue 2:

**Whether the approach towards the supply and delivery of employment development is justified, effective and consistent with national policy and the JCS.**

Questions

1. **What is the basis for the approach to employment development and the strategy for economic growth set out in the Plan? Is it consistent with national policy and the JCS? Is the approach justified and effective?**

3.1.1 The basis for the approach to employment development is set out in paragraphs 7.2.01 to 7.2.14 of the plan which follow the strategy established in the WNJCS. This is set out through policy S1 that seeks to support appropriate development of a lesser scale in and adjoining Daventry town. Policy D1 of the WNJCS focuses on the regeneration of Daventry town, reinforcing the approach in policy S1 by seeking the retention of existing employment areas and encouraging their regeneration and renewal. Importantly as set out in para 7.2.01 the jobs requirement figure established in policy S7 of the WNJCS being met through existing commitments and there is a significant supply of B8 strategic distribution consented at DIRFT III (as demonstrated in response to question 5 below – para 3.3.3).

3.1.2 As confirmed in para 7.2.10 and 7.2.11 the plan seeks to further the ambition of the WNJCS and place a focus on supporting job creation and the economy of Daventry town. This is achieved through defining the existing employment areas (as required by policy E1) and protecting what already exists but also provide additional supply to meet a demand for small and medium sized units (less than 10,000 sqm) identified through a study “Employment land in Daventry: The Demand for Small and Medium Units” (ECO3) undertaken by Peter Brett Associates and Aspinall Verdi. That study concluded that 1.8 ha- 3.5 ha per year would be required but recognised that only 5 years supply should be identified initially due to uncertainty with the economy nationally and challenges in identifying past trends, requiring 13 ha of land to be identified.

3.1.3 In order to allow a choice in the market, support the growth of local businesses and to enhance the economy of the town the plan makes allocations for employment use at a non-strategic scale to meet the demand over an initial 7 year period, extended from 5 years to align with anticipated adoption and provide further flexibility (16.2 ha-28.7ha) with some supply (7.3ha-19.8 ha) beyond 7 years.

3.1.4 The policy approach of EC4 and RA1 is also consistent with national policy in that it (alongside policy R2 for those strategic employment areas outside of Daventry town)
provides sufficient flexibility to accommodate needs not anticipated in the plan, for example supporting the expansion of existing businesses.

3.1.5 The approach towards employment development has been raised in the following responses; PS060, PS087/13, PS091, PS096 and PS106. The issues raised in these responses, in that the plan should make either further provision at Daventry town (PS091 and PS060) or provide additional allocations at Brixworth (PS096) or Crick (PS106) have been addressed in PSD11 and in responses to this question and questions 2, 3 and 4 below.

2. *Is the identification of Strategic Employment Areas justified and in accordance with national policy? What land supply remains available within the Strategic Employment Areas and what contribution can they make relative to identified needs? Is there any evidence of long-term vacancy of land and premises?*

3.2.1 The identification of Strategic Employment Areas is justified in the context of policy E1 of the WNJCS which confirms that existing and allocated employment sites across West Northamptonshire will be retained for uses within use class B1, B2 and B8 to help support a vibrant, successful and developing economy. As set out in para 7.2.05 the policy (E1) also confirms that detailed implementation will be through the part 2 local plans. The identification of these strategic employment areas is also consistent with chapters 1 and 3 of the NPPF as it is central to building a strong, competitive economy in Daventry and supporting a prosperous rural economy.

3.2.2 The land supply within the Strategic Employment Areas and their contribution relative to identified needs is set out in table 8 of the plan but summarised and updated below for convenience;
<table>
<thead>
<tr>
<th>Site/Ref</th>
<th>Industrial Estate</th>
<th>Site Size</th>
<th>Contribution to Identified Needs (units of less than 10,000 sqm)</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mustang Park DA/2015/1140</td>
<td>Royal Oak</td>
<td>8.9ha</td>
<td>4.5 ha</td>
<td>Under Construction</td>
</tr>
<tr>
<td>Newnham Drive (EC5) DA/2017/0171– 0.5ha</td>
<td>Drayton Fields</td>
<td>2.1ha</td>
<td>2.1ha</td>
<td>0.5ha complete</td>
</tr>
<tr>
<td>The Knoll (EC6) DA/2015/0903 – expired</td>
<td>Marches</td>
<td>3.4 ha</td>
<td>3.4ha</td>
<td>Council in discussions with potential developer</td>
</tr>
<tr>
<td>Former Focus DIY Site, Sopwith Way DA/2019/0010</td>
<td>Drayton Fields</td>
<td>1.4 ha</td>
<td>1.4 ha</td>
<td>Planning Permission granted</td>
</tr>
</tbody>
</table>

11.4 ha

3.2.3 The above table therefore shows that there is 11.4 ha of supply within existing industrial estates to meet the identified need of 13 ha. The remaining allocations will provide additional flexibility both in the initial 7 year period and in the long term.

3.2.4 As confirmed by the Demand for Small and Medium sized premises study (ECO3) as at September 2017 348,000 sq ft of floorspace was vacant, equating to 5.9% of the total stock. This equated to 20 units out of 943, 2.1% (Table 3.6, page 18). More recent business rates data (May 2019) also indicates that the number vacant units on the strategic employment areas is low relative to the whole stock and only 11 units have been vacant for more than 3 years.

3. **Is there a suitable range and choice of proposed employment site allocations, in terms of location, type, quality and size, to address the particular characteristics, roles and functions of areas of Daventry District, including the storage and distribution centre of national significance at DIRFT, and to meet the requirements of the JCS?**

3.3.1 Table 8 in the Part 2 Local plan (page 85) identifies the capacity of existing commitments and site allocations. Given the updates provided in the table in answer to question 1 it is considered appropriate to update the table. This is set out in Appendix 2 to this statement.

3.3.2 This table confirms that there are sufficient sites with planning permission and site allocations, covering a range of sizes (2.1ha to 20.5ha) at different locations around
Daventry town, to provide the additional space required identified for small and medium sized premises (less than 10,000 sqm) in a manner that is consistent with the WNJCS spatial strategy. To meet the identified demand of 13 ha over 7 years it is anticipated that at least 19.75 ha could come forward over 7 years which could increase to 32.32 ha if the currently available southern part of the Daventry South East allocation comes forward more quickly than anticipated, thus demonstrating a flexible supply. Whilst there is no outstanding requirement for jobs in the WNJCS these additional allocations help meet the requirements for supporting the regeneration of Daventry Town.

3.3.3 In respect of DIRFT, there is significant capacity of the extant development consent order to provide for any short term requirements to be met. In respect of any additional supply chain requirements, ECO3 confirms (para 3.83) that there is potential for demand in Crick but that this is likely to increase in the future as the latest phase of DIRFT is built and occupied. Given that only 48,290, sqm of phase 3 has been completed and there is a further 701,727 sqm of floorspace (of which 68,053 sqm is approved) to be delivered this is not considered to be a matter for this plan to address. This response, alongside PSD11 further address the issue raised in PS106.

3.3.4 Policy EC4 and RA2 provide additional flexibility for further commercial space if there are clearly identified local needs, however there was insufficient need demonstrated to justify any further allocations in this plan.

4. **Is Policy EC4 otherwise positively prepared, justified, effective and consistent with national policy and would it be sufficiently flexible to allow for alternative uses where appropriate?**

3.4.1 As established in response to Question 1 the approach to defining the Strategic Employment Areas is justified in the context of policy E1 of the WNJCS and with the need to build a strong, competitive economy in the district. The policy is also positively prepared in the context of the jobs requirement having been met for West Northamptonshire. Furthermore it is considered to provide sufficient flexibility to allow existing businesses to expand (therefore providing for needs not anticipated in the plan – para 21 of the NPPF).

3.4.2 The policy also provides, through criterion B sufficient flexibility for alternative non B1 (b,c), B2 and B8 uses.
5. **On what basis are the two sites within Policy EC8 identified and is the policy sufficiently clear and precise in terms of the identification of those areas? Would the policy provide sufficient clarity for the purpose of decision making?**

3.5.1 As explained in para 7.3.01 and 7.3.02 the two sites have been identified because they are clear priorities for the regeneration of Daventry town, in prominent locations. The South East gateway site is mapped under policy EC9. The focus DIY site is not mapped but its location is described in the supporting text.

3.5.2 The policy is considered to provide sufficient clarity through encouraging proposals in these locations (that would be judged against either EC4 (Former Focus DIY, Sopwith Way) or EC9 – Daventry South East gateway) but also recognising that the Council welcomes proposals to utilise long term vacant land elsewhere within Strategic Employment Areas. The Former Focus DIY site has received consent (DA/2019/0010) to redevelop the site (1.4ha) for 6,670 square metres of B1(C)/B2 & B8 use.

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

3.6.1 The Site Selection Background Paper (GEN05) sets out the methodology used to assess and select the proposed site allocations and the site selection process. The different stages are shown in the flow diagram (figure 1, page 18). The sites assessed including reasonable alternatives are shown in the plan on page 28 which is summarised in table 1. This confirms that the assessment was principally based on the assessment of sites undertaken through the HELAA (Stage 1) and the Sustainability Appraisal, which also included an assessment of reasonable alternatives (Part 3A, Section 3 of the SA) which were effectively all sites that formed a ‘ring’ around Daventry town. Sites in alternative locations away from Daventry town were not considered to be reasonable alternatives as discussed in response to Matter 1 question 6.

7. **Are the reasons for selecting the preferred sites and rejecting alternative sites, clear and consistent?**

3.7.1 Four employment sites were identified for allocation – the reasons why are set out in Appendix A of the Site Selection Background paper (GEN05). It is acknowledged that the SA identified that EC9 has significant negative effects on archaeology and cultural heritage (2) and landscape and townscape (9) as development could impact directly on archaeological and cultural features associated with Borough Hill and Burnt Walls. However as set out in GEN05 it was considered that the negative effects of the site could be mitigated. The Heritage Impact Assessment also confirmed that any impacts from this site (through assessing the EC9 allocation) on designated and non-designated assets could be mitigated to the lower end of less than substantial harm or avoid harm altogether. This mitigation is explained in more detail in the supporting text and set
out within the policy. This issue is discussed further in the response to Matter 5, question 12.

3.7.2 Three employment sites at Daventry town were rejected. In respect of the SA, two of these (135 – land to the West of Royal Oak Industrial Estate, 119 – Drayton Gate Farm) were rejected partly due to significant negative effects on landscape and townscape with the latter also having significant negative effects on archaeological and cultural heritage. The HELAA also identifies landscape impact as a key issue for both sites with site 119 also having a visual coalescence issue with Braunston and 135 considered to have a challenging topography.

3.7.3 Browns Road was not taken forward due to access constraints affecting the suitability of the site and that the site was not considered to be available.

The Council is requested to address the following questions for each of the proposed allocations and related policies; EC5 - Daventry, Land off Newnham Drive, EC6 - Daventry, The Knoll, EC7 - Daventry, Land North West of Nasmyth Road, EC9 - Daventry South East Gateway and EC10 - Daventry International Rail Freight Terminal. For the 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.

EC5 – Daventry, Land off Newnham Drive

8. Are the proposed employment 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 deliverability or viability?

4.8.1 As set out in the Site Selection Background Paper (site ref 259), based on the HELAA assessment and supported by the SA and other technical assessment, site EC5 is considered to be in in a suitable location within 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.

9. Are the site boundaries correctly defined?

4.9.1 The site boundary is correctly defined on inset map 12.
10. **What are the assumptions regarding the capacity of the site allocations for development and what is this based on?**

4.10.1 The site capacity in hectares is taken from the HELAA. The amount of potential floorspace has been based on either information submitted by the landowner or as established in the HELAA (HELAA1 – page 16) a gross to net development ratio of 40%. The capacity of this site has been taken from its total land area, identified as 2.1 ha (as set out in table 8, page 85).

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

4.11.1 Part of the site is already completed and it is anticipated that the remaining part of the site will come forward in 7 years. The site is owned by the District Council and the delivery timescale is considered to be realistic given the relatively small scale of the site and the limited infrastructure requirements.

12. **Are the suitable employment uses indicated and the restriction on unit sizes, including any differentiations for existing businesses in Daventry District, justified and consistent with national policy?**

4.12.1 No differentiations for existing businesses are proposed for this site. Furthermore the specific uses, B1(b,c), B2 and B8 are justified as they are essential to deliver the demand identified in ECO3 and consistent with policy E1 of the WNJCS and with National Policy as they provide sufficient certainty and flexibility.

13. **Is the approach to include the proposed site allocations within the scope of Policy EC4 once completed, justified?**

4.13.1 The approach is justified as it helps to ensure that the land remains within B1 (b,c), B2 and B8 use.

14. **Has the SA adequately assessed the employment 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?**

4.14.1 As indicated in Table 3.1c, page 13 of Part 3A of the SA (PSD03), “a number of existing employment sites were designated as strategic employment areas. These were formerly identified employment areas that have been previously recognised and relate to existing employment areas. These are assessed in Part 3B of the SA”. This applies to EC5 which is located within an existing industrial estate.

4.14.2 The results for the SA assessment of site allocation EC5 Land off Newnham Drive,
Heartlands are in Part 3B of the SA report (PSD03). This outlines the results of the appraisal of the preferred options of the local plan. Page 3 of Table 2.1 identifies the significant and uncertain effects and identified mitigation and Table 3B (18) Pg 53-58, the SA objective, sustainability effect and commentary and comparison of options for EC5. Minor negative effects were identified for air quality and noise and significant positive effects were identified for labour market and economy.

4.14.3 Mitigation measures are identified for those criteria that have minor negative effect (air quality and noise). There are no significant negative effects.

15. Are the proposed employment 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?

4.15.1 The development requirements set out in criteria i-v are justified as they respond to the site specific circumstances and help to ensure the site is deliverable (effective) and consistent with national policy in helping to ensure sustainable economic growth. Given the small scale of the site no requirements for a Masterplan are included in this policy.

4.15.2 There were no representations received in respect of Policy EC6.

EC6 – Daventry, The Knoll

8. Are the proposed employment 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 deliverability or viability?

5.8.1 As set out in the Site Selection Background Paper (site ref 260), based on the HELAA assessment and supporting by the findings of the SA and other technical assessment, site EC6 is considered to be in in a suitable location within an existing industrial area with no significant constraints or adverse impacts that would prohibit it coming forward for development. This is also confirmed in the proposed site allocation fact sheet, response EXAM 1D. The site is considered to be appropriate, justified and deliverable

9 Are the site boundaries correctly defined?

5.9.1 The site boundary is correctly defined on inset map 13.
10 What are the assumptions regarding the capacity of the site allocations for development and what is this based on?

5.10.1 The site capacity in hectares is taken from the HELAA. The capacity of this site has been taken from its total land area, identified as 3.4 ha (as set out in table 8, page 85).

11 What is the expected timescale for development in terms of lead in times and delivery, are these assumptions realistic and supported by evidence?

5.11.1 The site had planning permission, DA/2015/0903 but this has now expired. The site is owned by the District Council which is in ongoing discussions with a prospective developer. Given the relative small scale of the site and the limited infrastructure constraints it is anticipated that development will be completed on site in 7 years.

12 Are the suitable employment uses indicated and the restriction on unit sizes, including any differentiations for existing businesses in Daventry District, justified and consistent with national policy?

5.12.1 The restrictions on unit sizes are justified against the employment study (ECO3) which identified the demand for small to medium units and the allocations were made to help meet this need. However the differentiation for existing business in Daventry District is considered justified given the need to support the regeneration of the town (policy D1 of the WNJCS) and is consistent with the NPPF as it allows flexibility to respond to market signals. The specific uses, B1(b,c), B2 and B8 are justified as they are essential to deliver the demand identified in ECO3 and consistent with policy E1 of the WNJCS and with National Policy as they provide sufficient certainty and flexibility.

13 Is the approach to include the proposed site allocations within the scope of Policy EC4 once completed, justified?

5.13.1 Please see the answer to question 13.1 above in respect of site allocation EC5.

14 Has the SA adequately assessed the employment 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?

5.14.1 As indicated in Table 3.1c, page 13 of Part 3A of the SA (PSD03), “a number of existing employment sites were designated as strategic employment areas. These were formerly identified employment areas that have been previously recognised and relate to existing employment areas. These are assessed in Part 3B of the SA”. This applies to EC6 which is located within an existing industrial estate.

5.14.2 The results for the SA assessment of site allocation EC6 The Knoll, Marches Strategic Employment Area are in Part 3B of the SA report (PSD03). This outlines the results of
the appraisal of the preferred options of the local plan. Page 3 of Table 2.1 identifies the significant and uncertain effects and identified mitigation and Table 3B (19) Pg 56-57, the SA objective, sustainability effect and commentary and comparison of options for EC6. Minor negative effects were identified for air quality and noise and unknown effects identified for biodiversity, flora and fauna. Significant positive effects were identified for labour market and economy.

5.14.3 Mitigation measures are identified for those criteria that have minor negative effect (air quality and noise). There are no significant negative effects.

15 Are the proposed employment 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?

5.15.1 The development requirements set out in criteria i-v are justified as they respond to the site specific circumstances and help to ensure the site is deliverable (effective) and consistent with national policy in helping to ensure sustainable economic growth but also providing sufficient flexibility to respond to market signals where existing businesses require additional capacity. Given the small scale of the site no requirements for a Masterplan are included in this policy.

5.15.2 There were no representations received in respect of Policy EC6.

EC7 – Daventry, Land North West of Nasmyth Road

8. Are the proposed employment 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 deliverability or viability?

6.8.1 As set out in the Site Selection Background Paper (site ref 143), based on the HELAA assessment and supported by the findings of the SA and other technical assessment, site EC7 is considered to be in in a suitable location within an existing industrial area with no significant constraints or adverse impacts that would prohibit it coming forward for development. This is also confirmed in the proposed site allocation fact sheet, response EXAM 1D. The site is considered to be appropriate, justified and deliverable. This has been confirmed through representations from the site promoters Berrys on behalf of Prologis (PS086).

9. Are the site boundaries correctly defined?

6.9.1 The site boundaries are correctly defined on inset map 12.
10. What are the assumptions regarding the capacity of the site allocations for development and what is this based on?

6.10.1 The site capacity in hectares is taken from the HELAA. The capacity of this site has been taken from its total land area, identified as 13.4 ha (as set out in table 8, page 85). The proposed submission plan indicates that 50% of the site will help meet demand for sub 10,000sqm.

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

6.11.1 The prospective developer (Prologis) has indicated a willingness to bring the site forward and built the adjacent Apex Park site. It is anticipated that the site will come forward in 7 years. Given the limited constraints affecting the site and developers track record in delivering commercial floorspace on the adjacent site and elsewhere in the sub-region (including at DIRFT) it is considered that this build out rate is realistic.

12. Are the suitable employment uses indicated and the restriction on unit sizes, including any differentiations for existing businesses in Daventry District, justified and consistent with national policy?

6.12.1 The restrictions on unit sizes are justified against the employment study (ECO3) which identified the demand for small to medium units and the allocations were made to help meet this need. However the differentiation for existing business in Daventry District is considered justified given the need to support the regeneration of the town (policy D1 of the WNJCS) and is consistent with the NPPF as it allows flexibility to respond to market signals. This position in respect of this site is supported through the representation from the site promoter (PS086) and an application for an existing business to relocate to part of the site has been submitted (DA/2019/0366). The plan has assumed 50% of the site would be units of less than 10,000 sqm however were the application to be approved the level of floorspace under 10,000sqm would be 3 ha (22% of the site), lower than that anticipated (6.7ha) but would still provide a sufficient contribution to ensure the total demand of 13 ha over 7 years is met. The specific uses, B1(b,c), B2 and B8 are justified as they are essential to deliver the demand identified in ECO3 and consistent with policy E1 of the WNJCS and with National Policy as they provide sufficient certainty and flexibility.

13. Is the approach to include the proposed site allocations within the scope of Policy EC4 once completed, justified?

6.13.1 Please see the answer to question 13.1 above in respect of site allocation EC5.
14.  **Has the SA adequately assessed the employment 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?**

6.14.1 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.

6.14.2 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).

6.14.3 Every site option identified in Part 3a of the SA has been assessed against the 14 objectives of the SA frameworks. 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.

6.14.4 The results for the SA assessment of site allocation EC7 can be found at Site 143 (322), Page 97 - 100 Appendix 1, Part 3A (PSD03 and PSD04). Part 3B of the SA outlines the results of the appraisal of the preferred options. Page 7 of Table 2.1 identifies the significant and uncertain effects and identified mitigation and Table 3B (20), the SA objective, sustainability effect and commentary and comparison of options for EC7. Mitigation measures are identified for those criteria that have 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 EC7 responds to this through specific criteria 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.

15.  **Are the proposed employment 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?**

6.15.1 The development requirements set out in criteria i-v are justified as they respond to the site specific circumstances and help to ensure the site is deliverable (effective) and consistent with national policy in helping to ensure sustainable economic growth but also providing sufficient flexibility to respond to market signals where existing businesses require additional capacity. The requirement for Masterplanning is considered justified given the potential for the site to come forward in phases.
6.15.2 Representations were received from the following respondents in relation to Policy EC7 PS053/01, PS086/01. The former response focused on archaeology addressed in PSD11 and the latter came from the site promoter supporting the allocation.

EC9 – Daventry, South East Gateway

8. Are the proposed employment 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 deliverability or viability?

7.8.1 As set out in the Site Selection Background Paper (GEN05, site ref 143), based on the HELAA assessment and supported by the findings of the SA and other technical assessment, site EC9 is considered to be in a suitable location. As confirmed by the Site Selection Background Paper and in response to Q7 above it is acknowledged that the SA identified significant negative effects (relating to Borough Hill and Burnt Walls scheduled monuments), however as set out in GEN05 it was considered that the negative effects of the site’s development could be mitigated. The Heritage Impact Assessment for Daventry South East Gateway (HER02) also confirmed that any impacts from this site (through assessing the EC9 allocation) on designated and non-designated assets could be mitigated to the lower end of less than substantial harm or avoid harm altogether. As set out in the Council’s statement on Matter 5 Q12, the Council has been engaged with Historic England throughout the process of plan preparation. In response to concerns raised by Historic England (PS042) about the impact of a small part of the EC9 allocation on the setting of Burnt Walls, the Council is proposing the identification of a heritage buffer on the Policies Map and wording changes to be made to EC9, ENV8 and supporting text to both policies. A Statement of Common Ground (SGC01) has been agreed between the Council and Historic England. The Council requests that the Inspector considers the wording changes proposed in SGC01 as a potential main modification (PMM05). The identification of the heritage buffer would result in the quantum of developable land being slightly reduced. Furthermore it is a longstanding aim of the District Council to improve the gateway of the town in this location and this allocation will help to deliver this aim.

7.8.2 There are existing occupiers on part of the site, the Landmark hotel which is vacant and Interpart, the vehicle recycling facility. These occupiers do not need to be relocated for development to come forward on the remainder of the site however criterion C sets out criteria to help guide the relocation of the vehicle recycling facility and talks are ongoing with the occupier for an alternative location.

7.8.3 It is acknowledged that there are constraints for the whole site coming forward in the short term however the majority of the site is controlled by landowners who are willing
to bring the site forward, as confirmed in response PS014 confirming that they consider the plan to be sound. These potential constraints have been acknowledged in the anticipated levels of delivery identified in table 8, updated in appendix 2 below ranging from 1.65ha to 14.22 ha in 7 years. The 1.65ha scenario anticipates the land north of the A45 coming forward whereas the 14.22 ha also includes the greenfield site to the south. A further 5.48 ha could come forward in the medium term once existing occupiers are relocated. Importantly however the plan does not rely on this site for meeting the anticipated demand of 13 ha over 7 years.

9. **Are the site boundaries correctly defined?**
   
   9.7.91 The site boundary of EC9 is correctly defined on the policies inset map (page 13)

10. **What are the assumptions regarding the capacity of the site allocations for development and what is this based on?**

   10.7.101 The site capacity in hectares is taken from the HELAA. The capacity of this site has been taken from its total land area, identified as 20.5 ha (as set out in table 8, page 85) but reduced to 19.67 ha to take account of the proposed heritage buffer (SOCG01).

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

   11.7.111 Para 8.3 indicates the level of development anticipated on the site and it is considered that the minimum scenario (1.65 ha) is realistic given the limited constraints on that part of the site. 14.22 ha could come forward in time timescale but at the very least is expected to come forward within the plan period, given this is greenfield, has a willing landowner and has relatively limited infrastructure constraints. It is therefore considered this is realistic.

12. **Are the suitable employment uses indicated and the restriction on unit sizes, including any differentiations for existing businesses in Daventry District, justified and consistent with national policy?**

   12.7.121 The restrictions on unit sizes are justified against the employment study (ECO3) which identified the demand for small to medium units and the allocations were made to help meet this need. However the differentiation for existing business in Daventry District is considered justified given the need to support the regeneration of the town (policy D1 of the WNJCS) and is consistent with the NPPF as it allows flexibility to respond to market signals. This position in respect of this site is supported through the representation from the site promoter (PS086). The specific uses, B1(b,c), B2 and B8 are justified as they are essential to deliver the demand identified in ECO3 and consistent with policy E1 of the WNJCS and with National Policy as they provide sufficient certainty and flexibility.
13. **Is the approach to include the proposed site allocations within the scope of Policy EC4 once completed, justified?**

7.13.1 Please see the answer to question 13.1 above in respect of site allocation EC5.

14. **Has the SA adequately assessed the employment 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?**

7.14.1 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 outs 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).

7.14.2 Every site option identified in Part 3a of the SA has been assessed against the 14 objectives of the SA frameworks.. 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.

7.14.3 The results for the SA assessment of site allocation EC9 Daventry South East Gateway can be found at Site 323, page 182 - 189 Appendix 1, Part 3A (PSD03 and PSD04). Part 3B of the SA outlines the results of the appraisal of the preferred options. Page 7 of Table 2.1 identifies the significant and uncertain effects and identified mitigation and Table 3B (22), the SA objective, sustainability effect and commentary and comparison of options for EC9. Mitigation measures are identified for those criteria that have minor negative effect (air quality and noise, biodiversity, flora and fauna, soil, geology and land use) or significant negative effect (archaeological and cultural heritage and landscape and townscape). The response in para 7.8.1 above sets out how the plan has sought to mitigate the impacts in respect of heritage. In addition there is a specific policy on Burnt Walls and Borough Hill scheduled monuments (ENV8) and this issue is further addressed through an additional criterion in the policy, including that development of the site to be informed by assessments and suitable mitigation relating to archaeological, heritage, landscape and visual and ecological impacts.

15. **Are the proposed employment 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?**

7.15.1 The development requirements set out in criteria i-v are justified as they respond to the site specific circumstances, seek to mitigate the impacts identified through various
technical work and help to ensure the site is deliverable (effective) and consistent with national policy in helping to ensure sustainable economic growth but also providing sufficient flexibility to respond to market signals where existing businesses require additional capacity. The requirement for Masterplanning is considered justified given the potential for the site to come forward in phases, particularly given a proportion (5.48 ha) of the site is currently occupied.

7.15.2 Further to representation PS042 from Historic England, dealt with above and in response to Matter 5, Q12 a further response from the site promoters was received in support of the allocation (PS014).

**EC10 – Daventry International Railfreight Terminal**

8. *Are the proposed employment 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 deliverability or viability?*

8.8.1 The site is not proposed as an allocation but the policy is intended to provide guidance on the entirety of the site moving forward. WNJCS policy E4 also covers DIRFT however relates to Phase III which is being implemented through the DCO. This is distinct from EC4 because of the nature of the site that is specific to rail-based strategic distribution. Consequently it is not considered necessary to answer questions 10 – 15.

9. *Are the site boundaries correctly defined?*

8.9.1 The site boundaries of EC10 are considered to be correctly defined and representations have not been made suggesting otherwise.
Appendix 1 – Suggested update to the Town Centre Inset Map. Primary shopping frontage shown in Dark Blue and Secondary Frontage in light blue
## Appendix 2 – Update to Table 8 – Existing Commitments and Proposed Allocations at Daventry Town (Employment)

### A. Existing commitments

<table>
<thead>
<tr>
<th>Site name</th>
<th>Planning application reference</th>
<th>Total site size (Ha)</th>
<th>Floorspace (sqm)</th>
<th>Portion of site that will provide for units &lt;10,000sqm (Ha)</th>
<th>Status as at October 2017</th>
<th>Land anticipated to come forward in next 7 years (&lt;10,000sqm) to meet demand of 13ha (Ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mustang Park</td>
<td>DA/2015/1140</td>
<td>8.9</td>
<td>Unit 1 – 10,138</td>
<td>4.5</td>
<td>Site has planning permission. Site cleared and now under construction</td>
<td>4.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Unit 2 – 4,499</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Unit 4 – 15,919</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Former Focus DIY, Sopwith Way</td>
<td>DA/2019/0010</td>
<td>1.4</td>
<td>6,670</td>
<td>1.4</td>
<td>Site has planning permission</td>
<td>1.4</td>
</tr>
</tbody>
</table>

### B. Proposed allocations

<table>
<thead>
<tr>
<th>Site name</th>
<th>Allocation/Planning application reference</th>
<th>Size (Ha)</th>
<th>Floorspace (sqm)</th>
<th>Portion of site that will provide for units &lt;10,000sqm (Ha)</th>
<th>Status as at October 2017</th>
<th>Land anticipated to come forward in next 7 years (&lt;10,000sqm) to meet demand of 13ha (Ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land off Newnham Drive</td>
<td>EC5 DA/2017/0171 (0.5ha) granted 22/08/2017</td>
<td>2.1</td>
<td>Single unit – 1760 Remainder of site subject to masterplanning</td>
<td>2.1</td>
<td>Part of site has planning permission been completed</td>
<td>2.1</td>
</tr>
<tr>
<td>The Knoll</td>
<td>EC6 DA/2015/0903 granted 25/02/2016 (2.2ha)</td>
<td>3.4</td>
<td>Subject to masterplanning</td>
<td>2.2 3.4</td>
<td>Site has planning permission</td>
<td>0 3.4</td>
</tr>
<tr>
<td>Land off Nasmyth Road</td>
<td>EC7</td>
<td>13.4</td>
<td>Subject to masterplanning</td>
<td>6.7</td>
<td>Proposed allocation</td>
<td>6.7</td>
</tr>
<tr>
<td>Daventry South East Gateway</td>
<td>EC9</td>
<td>20.5</td>
<td>Subject to masterplanning</td>
<td>20.5 19.7</td>
<td>Proposed allocation</td>
<td>2.9 15.4 1.65 -14.22</td>
</tr>
</tbody>
</table>

**Total commitments**

<table>
<thead>
<tr>
<th>Total commitments</th>
<th>Total site size (Ha)</th>
<th>Floorspace (sqm)</th>
<th>Portion of site that will provide units &lt;10,000sqm (Ha)</th>
<th>Status as at October 2017</th>
<th>Land anticipated to come forward in next 7 years</th>
</tr>
</thead>
<tbody>
<tr>
<td>48.3</td>
<td>49.7</td>
<td>Of which will provide units &lt;10,000sqm 36 37.8</td>
<td>Of which anticipated to come forward in next 7 years 16.2–28.7 19.75–32.32</td>
<td>36 37.8</td>
<td>16.2–28.7 19.75–32.32</td>
</tr>
</tbody>
</table>