



**DAVENTRY DISTRICT SETTLEMENTS AND COUNTRYSIDE
LOCAL PLAN EXAMINATION**

STATEMENT

MATTER 4: Employment and Economy

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MATTER 4: Employment and Economy

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 the national policy and the JCS? Is the approach justified and effective?*
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. *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?*
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?*
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?*
6. *Was the methodology used to assess and select the proposed site allocations appropriate? Were reasonable alternatives considered and tested?*
7. *Are the reasons for selecting the preferred sites and rejecting alternative sites, clear and consistent?*

- 4.1 The Submission Draft Local Plan identifies a number of existing Strategic Employment Areas for safeguarding under Policy EC4. One of the areas identified on the Proposals Map is the Daventry Royal Oak Industrial Estate south of Braunston Road. This is one of the main industrial estates in Daventry and is attractive as an employment location for a range of businesses.
- 4.2 The Part 2 Plan does not propose any expansion to this strategic employment area. Instead, amongst a number of proposed employment allocations, land at Daventry South East Gateway is proposed for allocation under Policy EC8.
- 4.3 The Site Selection Background Paper, December 2018 (ref GEN05) provides a summary of the reasons for selecting the South East Gateway Site for allocation (site ref 323) and notes that the land west of Royal Oak Industrial Estate (site ref 135) was rejected at the second stage due to 'significant negative effects on landscape and townscape'. This summary does not accurately reflect the assessment set out in the Emerging Draft Plan Sustainability Appraisal, November 2017. This assessment, whilst concluding significant negative landscape effects also noted that the site could be designed sensitively with respect to the landscape character and views to-from local landmarks.
- 4.4 Comparing the assessments of the Royal Oak land with the South East Gateway, the assessments are broadly similar, albeit the South East Gateway has two double negative red scores for heritage and landscape impact (see Appendix 1).
- 4.5 The approach to assessing sites for allocation and considering other alternative sites and the reasons for selecting sites is somewhat unclear.
- 4.6 As one of the important existing employment areas, the Plan should look to provide for appropriate expansion opportunities for the Royal Oak Industrial Estate and should therefore be amended to allocate additional expansion land south of Braunston Road.

Appendix 1

Emerging Draft Plan Sustainability Appraisal – Comparison of Sites 135 and 323, FSD01, November 2017

	Site 135	Site 323
1. Air Quality and Noise	+/-	+/-
2. Archaeology and Cultural Heritage	-/?	- -
3. Biodiversity	-	-
4. Crime and Community Safety	0	0
5. Education and Training	0	0
6. Energy and Climate Change	0	0
7. Health and Wellbeing	+	+
8. Labour markets and regeneration	++	++
9. Landscape and Townscape	- - -	- - -
10. Material Assets	N/A	N/A
11. Population and Social Deprivation	0	0
12. Soil and Geology and land use	-	-
13. Waste	0	0
14. Water	0	0