

c/o Deborah Jewel
Daventry Town Council
3 New St,
Daventry,
NN11 4BT

Mr Bob Ham
Planning Officer
Daventry District Council
Lodge Rd,
Daventry, NN11 4FP

8th July 2022

Dear Mr Ham,

Application No: Outline application (all matters reserved save for part access in respect of a re-aligned B4036 and a new roundabout at its junction with the A5) for the development of an urban extension to the north-east of Daventry including circa 3,400 dwellings (Use Class C3), elderly persons accommodation (Use Class C2), a new local centre (including convenience store (Use Class A1)), pub/restaurant (Use Class A3/A4), day nurse/communitiy and other uses within Use Class D1 and retail terrace (Use Classes A1 - A5 & D1), an extension to Daventry Country Park, two new primary schools, a new secondary school, highway infrastructure (including a new access into the site off Eastern Way and a new road link to Norton, involving stopping up part of Daventry Road to vehicular traffic), new walking and cycling routes, structural greenspace, wildlife corridors and associated landscaping, drainage and infrastructure works.

Daventry North East, B4036 Long Buckby Road, Daventry, Northamptonshire

Thank you for providing the opportunity for Daventry Town Council to respond to this additional submission of information for this planning application and agreeing to extend the submission deadline until the end of July 2022.

As you will be aware the Council has engaged with the developer through the pre-application consultation and at each stage of the planning application process with the LPA. The last consultation response was provide to the submission of the application by the developer's agent Pegasus in May 2020.

The Planning Statement Addendum states that the revised information submission has been produced following the receipt and review of responses from statutory



consultees, ongoing liaison with West Northamptonshire Council officers and further work undertaken as a result of requests for additional information from statutory consultees. Daventry Town Council will respond to these proposed changes to the application in reference to their original responses and comments.

From the information provided via the LPA's planning portal and in reference to the Design and Access Statement Addendum and Planning Statement Addendum there appears to be the following principal changes to the masterplan from this latest submission.

- the relocation of the proposed secondary school site,
- the inclusion of a potential area of allotments/community orchard within the eastern area of green infrastructure, and
- additional pedestrian/cycle links connecting to Daventry Reservoir and the Grand Union Canal.

A Health Impact Assessment has also been provided to support the application which is encouraged by Policy CW1 of the Local Plan Part 2. The updated submission is also accompanied by an Environmental Statement Addendum considering the environmental and biodiversity impacts of the proposed changes to the application.

The Planning Statement Addendum states that the Affordable Housing Statement and position in relation to Section 106 Heads of Terms and CIL remains as per the previous Planning Statement and that *'it is the applicants intention to submit a financial viability appraisal in due course.'* We will comment further on this later in this response.

We will firstly comment on the substantive changes to the proposals and masterplan, listed above, before commenting on wider issues which may not have been addressed from our previous response.

Relocation of the Proposed Secondary School Site

Daventry Town Council welcomes the proposal to relocate the combined secondary and primary schools previously situated to the very west of the development closest to the town centre. It is interesting to learn that the timing for delivery of the secondary school will now be later in the phasing of the development and not towards the beginning as previously thought. The Planning Statement Addendum states that the previous discussions in 2020 with LocatED, a schools Trust, to provide a free school within the development are no longer in play. A new site for this secondary school has been provided to the north of Eastern Way, adjacent to the Icon Centre by Daventry District Council prior to them becoming a part of West Northamptonshire Council.



Regardless of this development with LocatED the Town Council felt that this location was inappropriate for several reasons and it is good that this major community facility is now located towards the middle of the site adjacent to the main neighbourhood centre.

However, the combined secondary/primary school site, at approximately 11.6ha, is a large area of land which as a development block will not have any permeability through to the area of Green Infrastructure to the East. It will be important to ensure the detailed design of these schools are integrated into the landscape of the site and that they make a positive contribution to the urban design and development in that part of the site as part of the neighbourhood centre. Additional public footpaths on the southern boundary of the school site might help to reduce this lack of permeability and provide greater accessibility to the allotments and community orchard, however, detail design issues would need to be considered regarding community safety and security for the schools.

A further issue which is raised in moving the schools to this site is the location of the playing fields within the green infrastructure area which was always regarded in planning terms as a green buffer between the development and the village of Norton. The Council is concerned that the positioning of these playing fields and allotments/community orchard next to them will urbanise this area of the development even though there will be limited or no physical development. The use of the land will still be intensive and the proposed quiet/tranquil areas within the buffer zone will not be a continuous extensive area down the eastern side of the development. This is also borne out in concerns raised by WNC that the pitches will not have floodlighting and it being unclear as to whether a MUGA (Multi-Use Games Area). This latter requirement is something which needs to be provided for all new schools and calls into question whether the facility could meet the required standards or whether they would be suitable should they be able to become available for community use while not used by the schools. If the playing fields and allotments/community orchard are to be located in this area then significant thought will need to be given to ameliorating any impacts that these uses might create within the adjacent green infrastructure buffer zone and wider afield to Norton village.

Given that the previous schools' site areas were contained completely within the urban area of the development and the playing fields were not situated within the green infrastructure zone, it does not appear that any commensurate land area has been 'given back' for additional open space in the revised masterplan. There has been some minor expansion of the main north-south green artery however this is limited. The Town Council, in its original response to the application, commented that the green



corridors that have been designed through the development site to provide a green link between Borough Hill and the extended Country Park would need to be much wider to act as proper wildlife corridors. The Town Council thinks that recompensation for land lost in the Green Infrastructure buffer through school pitches should occur within the main built development area providing greater Green Infrastructure corridors here which would benefit new residents and also local ecology.

Inclusion of a potential area of allotments/community orchard

This was not something that the Town Council lobbied for through its original response and seems to have been provided in response to the Local Planning Authority's response to its encouragement through the Local Plan Part 2. As such the Town Council welcomes this addition to the masterplan and provision of extra community facilities that residents will be able to access and use, increasing health opportunities and biodiversity.

However, the Council is concerned that the situation of the allotments and community orchard (2.56ha in total) is all in one location which is adjacent to the school playing fields. This causes a similar issue to the playing fields in as much as it introducing more active uses onto this land albeit not to the same extent as playing fields. It is also unfortunate that the area has been designated in one block. It would have allowed far greater access to the new residents of this urban extension to have 2 or 3 allotment locations positioned around the development so that more people would be local to it and be able to walk there as well as feeling ownership of it. Further work could be carried out to provide multiple smaller locations which would increase the proximity to more residents.

Additional pedestrian/cycle links connecting to Daventry Reservoir and the Grand Union Canal.

The Planning Statement Addendum states at 2.6 that *'further amendments to the Illustrative Masterplan include additional pedestrian/cycle links to Daventry Reservoir to the west, and to the Grand Union Canal to the northeast.'* The Design and Access Statement Addendum also maintains that *'further connections have been added around the site boundary to ensure that the development integrates with the wider context, in particular with suggested connections to the Daventry Reservoir recreational route, the Grand Union Canal tow-path and a point to cross the A5.*

This increase in provision is key to ensuring that the sustainable movement choices are holistically delivered around the site, creating cyclical routes for recreation and commuting.'



Daventry Town Council welcomes the addition of these pedestrian and cycle links. The enhanced access to the circular reservoir heritage trail will make this more available to local residents particularly those living adjacent to or nearby to the reservoir. It is also something the Town Council raised in its initial consultation response to would act as a connecting thread for this Green Infrastructure. However, as a Local Nature Reserve this increased accessibility and activity will need to be balanced in order not to impact ecological and wildlife habitats.

Increased access to the Grand Union Canal tow path and links from this into the wider countryside will be very beneficial for residents located to the north of the development but also in terms of general permeability.

At the time of the original consultation response in 2020 the Town Council raised the issue of a strong and safe route for cyclists and motorists to be created to Long Buckby Station. This is still a major concern and issue for the Town Council. It is acknowledged that the revised masterplan now shows that the proposed pedestrian/cycle link to the A5 roundabout now crosses the road and continues to the edge of the site boundary a short distance along Three Bridges Road. This crossing should be suitably designed to make it safe and provide a demand-controlled junction crossing.

The upgrade of the rest of this road through to Long Buckby station is also essential to ensure a safe commuting route for residents who wish to access the national rail network to commute to work or for leisure purposes and who don't wish to use the car to get there. Provision should be made through developer contributions or CIL to put these upgrades in place at the same time as the upgrades to the A5 and the Council still believes that it is the responsibility of the developer in partnership with the new unitary authority (West Northamptonshire Council) to see that this is delivered.

Wider Considerations

Transport – The Local Highways Authority (LHA) has assessed the revised masterplan and additional information and *'concludes that the findings of the original Transport Assessment remain sound and that the proposed changes do not significantly affect this conclusion.'* The LHA has provided some comments on the emerging detailed design for some of the proposed highway/transport infrastructure. Of most importance to the Town Council is the safety aspects of the roundabout junction on the A5/B4036 and how this junction functions adequately and safely for all forms of transport not just vehicles. The LHA states that the applicant acknowledges its long-term ambition for a 4m wide shared foot/ cycleway to the east of the A5 to link to Long Buckby station. The Town Council supports this ambition and the comments provided by Long Buckby



Parish Council in this regard and considers that the applicant should be planning this vital link as well as contributing to its delivery.

The Town Council wishes to reiterate its desire to be directly consulted on the detail of the Construction Environmental Management Plan which will be put in place to control the impacts from the construction phase of the development. It also wishes to restate that proposals to refurbish the subways under A425 South Way and B4036 Eastern Way, including improvements to lighting and the offer of CCTV facilities is not the right approach to create a strong and safe pedestrian link from the development into the town centre. The Council still considers that this is a missed opportunity to create strong and safe routes from the development which do not rely on underpasses and remain 'above ground' for the entirety of their length.

The Town Council also raise the issue of a potential bus link through the Country Park extension to link into the Monksmoor development. It is not known whether this proposal was fully investigated with the Highway Authority, however, without this or another link to the north and west the provision of public transport buses for the development will be limited due to it being a cul-de-sac and there not being a way to

link to wider town bus routes. The Town Council considers that relocation of the secondary school will help to increase the viability of local bus service creating a centre of gravity and demand further within the development site. However, the ability to link across to the Monksmoor development with a public transport link should still be investigated and tested.

Health

A Health Impact Assessment has been provided with the revised submission and indicates that should an additional GP surgery not be provided within the town centre then consideration will be given to providing it as part of the local centre. Discussions are supposedly on going with the CCG and their comments are that they will be seeking contributions towards supporting access to good quality primary health care

services. The Town Council is concerned that these facilities are planned and delivered in a timely fashion so that there is not an impact on existing facilities from the new residents in this development. If a facility is to be integrated into the new local centre a site should be reserved and the centre planned accordingly with this in mind through the proposed Design Codes. The contribution to achieve this should also be provided in a timely manner so that these facilities can be provided when they are required.



Utilities Infrastructure

The Town Council is pleased to see that proposals still remain in place to underground the high voltage electricity cables running through the site currently suspended by pylons. The masterplan has been amended to provide a no-built form area above the underground utility on a north/south alignment as referenced at 3.2.1 in the Design and Access Statement Addendum. This will allow a wayleave for the electricity company in order to access and maintain their asset underground. Presumably this is the only area of built development where the cables would need to be routed. The rest of the undergrounding could be achieved in the open space areas.

The Town Council considers the references in the Environment Statement Addendum at 4.4.4 regarding the electricity cables remaining in situ and the illustration at Figure 4.6 showing the need for an offset area with no built development due to the remaining pylons to be unacceptable. In this situation, it is suggested, that the offset area would be utilised as public open space. This is also unacceptable.

The Town Council understands that alternative proposals need to be assessment in the event that the underground cannot feasibly be delivered, however, it believes that the alternative would render the development unsupportable in planning terms should this come to pass. The Council also considers that the developers have also missed an opportunity to demonstrate this development as a low carbon or carbon zero exemplar leading the way in designing and delivering low carbon living. The Council reiterates its request that all dwellings should be provided with Electrical Vehicle charging points so that these do not need to be retrofitted and will encourage residents to switch to an electric car. It also wishes to see a condition imposed which will require the developer to provide a local energy strategy for the development to demonstrate what level of carbon reduction can be achieved through different technologies employed on the site.

Viability/Developer Contributions/CIL

The original Planning Statement in section 8 sets out the Section 106 Heads of Terms and CIL contributions that will be required as part of this development to mitigate the impacts from the development.

It is acknowledged that this is an initial starting points and further negotiation is required dependant on other requests for developer contributions. As Daventry is an area which operates a Community Infrastructure Levy, strategic infrastructure which is identified and set out through the CIL regulations can be funded through this



mechanism. Site specific issues which require mitigation will be agreed through a s106 agreement.

The Town Council has previously queried whether CIL receipts will be sufficient to fund key early infrastructure for this development, i.e. the secondary school which will be c. £30m (£22.5m contribution from this development) while it is still having to service payments against the Daventry M1 Link Road for which there is a funding agreement signed with the County Council. The forward funding mechanism required DDC to provide a significant level of funding for the Link Road from both CIL and the New Homes Bonus. The Town Council would like to have assurances that the phasing and funding of infrastructure for this development will not be delayed or hampered by former commitments and on-going payments from the CIL pot.

The Town Council is concerned that the initial Heads of Terms references that the proportion of affordable housing will be determined as part of wider discussions in relation to contributions and the viability appraisal. The Council would wish to see full transparency of these appraisals and how they are affecting the overall delivery of the scheme against it being fully policy compliant. It is acknowledged that major urban extensions are difficult to create and are often marginally viable due to the major up-front infrastructure burdens. The Town Council considered it is the responsibility of the developer and the Local Planning Authority to ensure that all opportunities for external funding have been exhausted to ensure that the maximum community benefits can be provided by the development with the highest quality of design and materials. The provision of the under grounding of the electricity cables, while a public benefit, will cost a significant amount of money. This is a necessary requirement of this site, however, it should not be at the expense of the viability of other community benefits and s106 contributions such as social housing. The Town Council therefore urges all parties to initiate a dialogue with potential funding bodies, such as Homes England, at the earliest point if viability is likely to be constrained.

Conclusion

The Town Council has engaged proactively with the consultation for these significant development proposals for the North East SUE and has been disappointed that further engagement was not forthcoming from the development after the technical work had been completed.

While the Town Council is generally supportive of the main changes set out within the additional submission it still has significant concerns with the proposals as outlined above. It is apparent that further negotiations will be on-going with the Local Planning Authority and statutory consultees during the assessment of this application



particularly in respect of the developer contributions and the ability to fulfil this due to viability issues. The Town Council wishes therefore to object on the grounds set out above and to reserve its position to comment further once the views and comments of the key statutory consultees have been published and made known, further amended proposals have been submitted and the position of the viability appraisal is understood.

Yours sincerely,



James Wilson
Director – James Wilson Associates
For and on behalf of Daventry Town Council

