

**LAND TO THE EAST OF DAVENTRY AND NORTH OF THE A45
(THE DANETREE CONSORTIUM)**

**LAND AT MONKSMOOR FARM, WELTON LANE, DAVENTRY
(CAPEL HOUSE PROPERTY TRUST LIMITED)**

**LAND AT CHURCH FIELDS, LONG BUCKBY ROAD, DAVENTRY
(CROUDALE HOMES LIMITED)**

**PINS REF: APP/M9570/A/08/271505,
APP/Y2810/A/08/208332/NWF, APP/M9570/A/08/2083327,
APP/Y2810/A/08/208332/NWF & APP/M9570/A/08/2083327**

**LPA REF: DA/2007/0450, DA/2007/0200, DA/2007/0201,
DA/2007,0200 & DA/2007/0201**

**OPENING SUBMISSIONS ON BEHALF OF
DAVENTRY DISTRICT COUNCIL ON
HIGHWAYS AND TRANSPORT ISSUES**

- 1 We refer to the opening submissions on behalf of the Council, dealing with matters in general (Ref: DDC27). This statement complements many of the matters referred to therein, particularly those covered in paragraphs 17 and 18 (on prematurity). The Council repeats the comment that decisions about the major transport and highways infrastructure required to support the appeal proposals are most appropriately taken in the context of the Joint Core Strategy.

- 2 A number of the Council's reasons for refusal concern highways and transport issues and also the need for further information. In the case of the Danetree Appeal this concerns reasons for refusal (1) lack of connectivity and failure to integrate with the built up area; reason (3) regarding failure to demonstrate how traffic generated by the proposed development would be accommodated and failure to demonstrate how the acceptable level of modal split is to be achieved; and reason (4) lack of information regarding the various environmental impacts (including Regulation 19 request). As

indicated in the evidence of S Ellis (DDC1), the Council relies on evidence of NCC and the HA concerning reason (3) and largely WNDC's evidence concerning reason (4). Reason (5) (lack of section 106 planning obligation) is also relevant but this will be dealt with through the section 106 evidence.

- 3 In the case of the Church Fields Appeal the reason for refusal (3) on lack of information within the submitted Transport Assessment and the regulation 19 reason (11) are similarly relevant, as are section 106 issues (DDC Committee Report of 15/12/2008 – see CD 5.20, 7.30 and 9.28).
- 4 In the case of the Monksmoor Appeal DDC drew attention to pedestrian/cycling connectivity and section 106 issues (DDC10). Through their Joint Statement dated 20 February 2009 (DDC28) DDC and the appellants agreed that, save for the issue of highways contributions (local and strategic network) and section 106 contributions, there were only two outstanding matters between the parties. Neither of those two outstanding matters concerns highways or transportation matters. The issue of highways contributions is the subject of ongoing discussions between DDC and the other respective parties to these Appeals and therefore the Inquiry will be updated on that issue as those discussions progress.
- 5 The Council's case on transport and highway matters is set out in more detail by S Bowers (DDC29). See for instance paragraph 3.21 indicating DDC's concerns as to the lack of sufficient information on the bypass proposals.
- 6 The Council has given an indication of its views on questions raised by the Inspectors (document ID6) set out in paragraph 3.44 of DDC29. DDC has also addressed the issue of the "interim pain" which could be allowed and concludes that this equates to 850 dwellings (DDC29, paragraph 3.32 and DDC32, paragraph 2.2).
- 7 Discussions concerning conditions and section 106 obligations are ongoing and referred to in DDC33. DDC will continue to progress these issues together with other parties and anticipate that the matters will be returned to during the round table sessions.

BRIAN HURWITZ

Dated: 25 June 2009.

Signed: Sharpe Pritchard
Sharpe Pritchard

Ref: BH/100484/6