REVIEW OF REPRESENTATION BY BRIXWORTH PARISH COUNCIL
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1.0 Introduction and Background

1.1 The Environment Partnership (TEP) Ltd has been appointed by Daventry District Council (DDC) to consider a representation by Brixworth Parish Council to Daventry District's Emerging Draft Local Plan Part 2 Consultation.

1.2 The representation appraises the relevant landscape evidence base documents and challenges the Local Plan's intention to amend the Special Landscape Area (SLA) boundary in the area to the west of Brixworth. The Parish Council is of the view that the relevant landscape evidence base documents, primarily the Daventry Landscape Character Assessment (May 2017) and the Special Landscape Area Study (March 2017) do not make sufficient reference to the Brixworth Neighbourhood Plan and that there are other faults in the assessments undertaken leading to the proposal to amend the SLA boundary.

1.3 In support of the Parish Council's representation, a Landscape Statement was prepared by Chartered Landscape Architects Huskisson Brown Associates during January 2018.

1.4 This report provides an analysis of the representation with reference to the landscape evidence base in preparation of the Local Plan. The report considers whether the proposed amendment to the SLA remains justified in the light of the representation.

Daventry Landscape Commission

1.5 The following outlines landscape evidence base documents for the Draft Local Part 2 carried out by TEP between October 2016 and September 2017 (with relevance to the representation).

- Core Task 1 – this involved a review and update of the existing evidence and landscape character assessment. The existing evidence comprises the Northamptonshire Environmental Character and Green Infrastructure Suite (2005); Daventry Infrastructure Studies – Green Infrastructure and Landscape Technical Report (2008) and the Northampton Landscape Sensitivity and Green Infrastructure Study (2009).
- Core Task 2 – this required the review of the Special Landscape Area (SLA) forming part of the saved Policy EN1 from the Local Plan (1997). As part of this core task, justification for the potential for a high quality landscape designation was required, including the definition of boundaries.
- Core Task 3 – based on the findings of core tasks 1 and 2, consideration was given as to whether any part of the District would be appropriate as an Area of Outstanding Natural Beauty (AONB).
- Core Task 5 – using the findings from the core tasks, appropriate wording for criteria based policies against which to consider proposals affecting valued and sensitive landscapes was prepared.
• Daventry Landscape Capacity Assessment Toolkit - providing a framework for making decision relating to specific development proposals, to help identify the landscape’s sensitivity to the proposed change and whether the landscape has the capacity to accept the change without adverse impact.
2.0 Summary of Brixworth Parish Council's Representation

2.1 A summary of the matters highlighted in the representation is provided below.

Brixworth Neighbourhood Development Plan (2011-2019)

2.2 The Brixworth Parish Council Neighbourhood Development Plan 2011-2029 (BNDP) was made in December 2016 and it forms part of the development plan in Daventry District. The BNDP builds upon the policies in the Adopted Local Plan and therefore does not include specific policy relating to the SLA. Policy 2 (Development in the Open Countryside) and Policy 3 (Assessing the Impact of Development on the Setting and Views around Brixworth) are however of relevance to the landscape and visual setting of Brixworth.

2.3 Appendix 5 of the BNDP includes a Landscape Character Assessment prepared by Lockhart Garratt in August 2014 to provide evidence to the BNDP. This also considers the sensitivity of the landscape to development.

2.4 Proposals Map 1 of the BNDP indicates the landscape to the west of the parish as ‘High Sensitivity’ and also indicates a number of ‘Important Views’ which are protected under Policy 3 of the BNDP on account of the views and vistas being “important to the unique character of the village and its rural feel”.

2.5 The made NDP provides a clear indication of the high value placed upon the landscape and rural setting to the village by the community of Brixworth. Paragraph 3.17 notes that “This surrounding landscape is highly valued by residents due in part to the magnificent far reaching views and associated tranquillity. This is particularly true on the western and southern sides of the village” and paragraph 3.19 records that “During the Public Consultation the residents of Brixworth expressed their desire to maintain its village atmosphere and rural landscape”.

Landscape Statement - 25th January 2018 (Huskinson Brown Associates)

2.6 The Statement challenges the soundness of the Local Plan Part 2 landscape evidence base, as follows:

- apparent incorrect emphasis on NPPF policy protecting ‘valued landscapes’. The Statement considers that this has to some degree skewed the consideration of the special qualities of the SLA;
- the policy context appears to be confused in terms of whether the policy evidence base is addressing valued landscapes or special landscape qualities it seeks to protect;
- the criteria for the identification of valued landscapes in the SLA Study is taken from Guidelines for Landscape and Visual Impact Assessment 3 (GLVIA3), which is aimed at assessing the landscape and visual impact...
of development proposals, despite the terminology definitions being taken from Natural England guidance on landscape character assessment. The criteria applied have not been tailored or developed to more appropriately draw out where ‘special qualities’ of a landscape has value.

- the SLA Study provides no information to identify how the criteria against which it judges landscape value are weighted or disaggregated suggesting that each of the criteria are ‘scored’ equally. The evidence base is alleged to lack transparency and robustness in this regard and seemingly suggest that a landscape that meets all of the value criteria listed is more valuable than one that might have many special features in a few of the categories.

- Areas of landscape are proposed to be removed from the SLA on a character type basis. There is no planning requirement for a designation to cover the same character type or area, indeed the interface between two areas can often give emphasis to the special qualities of the other – as is the case for the floodplain LCA which emphasises the characteristic rolling landform of the adjoining landscape.

- The SLA Study considers that LCT 4 (Rolling Valley Slopes) does not demonstrate “sufficient distinctiveness to warrant designation as an SLA” and that its inclusion would “diminish the credibility and ‘brand’ of the SLA as a designation”. No information is provided to clarify the weighting used or qualify what “sufficient” distinctiveness equates to. The policy is not sound in this regard.

2.7 The Statement compares the Daventry SLA Study with the recent South Northamptonshire SLA Review. It considers the latter's approach to be preferable in terms of its different consideration of valuing the special qualities of a landscape and in considering the impact of roads and settlement in defining the SLA.

2.8 The Statement considers the removal of the area west of Brixworth from the SLA would potentially damage the special qualities of this landscape and it would make it more vulnerable to development. In the opinion of the author of the Statement, the area to be removed shares those special qualities and includes a number of viewpoints across to the former and proposed retained SLA.

2.9 The Statement concludes that the evidence used to amend the existing SLA boundary is not sufficiently robust and that the existing SLA boundary (saved policy ENV1 from Local Plan 1997) should be retained.
3.0 Analysis of Brixworth Parish Council Representation

3.1 TEP has reviewed the scope and content of the representation in respect of the proposed amendment to the Special Landscape Area (SLA) boundary in the area to the west of Brixworth.

3.2 As part of the review, TEP undertook a site visit on Thursday 19th April 2018 and took a selection of photographs from some of the same viewpoints as the Huskisson Brown Associates Landscape Statement and the designated views from the Brixworth Neighbourhood Development Plan (see below). The photographs have been used as part of the analysis of the representation.

3.3 TEP’s analysis of the representation is outlined below and should be read in conjunction with Figure 1 (Special Landscape Area Boundaries and Viewpoint Locations) and photosheets (IN6974.002). Further consideration of the landscape characteristics in the viewpoints is provided in Chapter 4.0.


3.4 TEP has reviewed Proposals Map 1 of the BNDP which indicates that the landscape to the west of the parish is of ‘High Sensitivity’ and appreciated by a number of important views. Land to the west, north and south of the settlement is defined as a locally complex pattern of undulating enclosed pasture and undulating arable land and identified as highly sensitive to change. The land also provides expansive views to recreational users in the south and west, and fields to the north protect the setting of the Saxon Church (All Saints Church).

3.5 The designated views in the BNDP relevant to land south and west of Brixworth are from:

- 1 - the north on the A508, looking south across fields to the Saxon church;
- 2 - Froghall and looking west;
- 3 - Froghall looking west across the Brampton Valley Way;
- 4 - Shelleycotes Road, Froxhill Crescent and Stonehill Way looking south through to south west;
- 5 - close to the mini-roundabout with The Ashway and Northampton Road and looking south west and west;
- 7 - Merry Tom Lane towards Brixworth;
- 8 - the Welford Road towards Brixworth;
- 9 - the Brampton Valley Way looking up to Brixworth;
- 11 - the top of Froghall towards the Saxon Church; and
- 12 - the Saxon Church looking over Hall Park.
3.6 TEP concurs that the above landscape and views contribute to and enable the appreciation of the landscape and the wider countryside and that the landscape policies in the Council’s Emerging Local Plan Part 2 are sufficient to protect landscape character from development proposals that would cause landscape harm.

3.7 The BNPD points to the high value placed upon the landscape and rural setting to the village by the community of Brixworth. The landscape is valued for its ‘magnificent far reaching views and associated tranquillity which is particularly true on the western and southern sides of the village. During the Public Consultation the residents of Brixworth expressed their desire to maintain its village atmosphere and rural landscape’. The value attached to the landscape by the community cannot be disputed and it is appropriate for a neighbourhood plan to make local designations. The ‘High Sensitivity’ landscape will still be taken into consideration in decision making because the BNPD forms part of the development plan for the District. Viewing the SLA at a District level, the same landscape characteristics have been assessed by the Review of the SLA Study. The Study concluded that while the land to the south, west and north of Brixworth meets some of the landscape value criteria, overall the land did not warrant SLA designation. This is elaborated in the Special Landscape Area Study at paragraph 4.20 and by Appendix 1 of the same study at paragraphs 1.2 to 1.5.

Landscape Statement 25th January 2018 (Huskisson Brown Associates)

Incorrect Emphasis on NPPF Policy regarding Valued Landscapes

3.8 The representation considers that that the NPPF places a focus on town planning concentrating protection of ‘valued landscapes’ and that the District Council’s reference to this has to some degree skewed the consideration of the special qualities of the SLA.

3.9 TEP is aware that since the introduction of the NPPF there have been a number of appeals and legal cases addressing what may constitute a ‘valued landscape’, whether designated or not. Some of these matters have relevance to consideration of the qualities of landscape and are appropriate. Planning cases have referred to valued landscapes having recognisable qualities that distinguish them from other landscape or ‘the countryside’ generally.
Confusion with Policy Context

3.10 The representation suggests that the policy context appears to be confused in terms of whether the policy evidence base is addressing valued landscapes or special landscape qualities it seeks to protect. TEP notes above that there are matters which have been raised when considering whether a landscape comprises one 'valued' in NPPF terms which have some relevance to consideration of the qualities of landscape. As set out below, there are criteria set in guidance which assist identification of special qualities of landscape and which have been used in the SLA study.

Criteria for Identification of Valued Landscapes

3.11 The representation considers that GLVIA3 is the 'industry recognised' guidance for considering landscape value in relation to the assessment of development proposals and that therefore the criteria it uses for the identification of valued landscapes is not wholly applicable to the consideration of local landscape designations. TEP disagrees with this suggestion as its experience in professional practice, including public and Local Plan inquiries is that the criteria are applicable to any type of assessment considering landscape value. This criticism is diminished by the representation subsequently advocating reference to GLVIA3 for guidance when assessing landscape.

3.12 The representation goes on to state that the criteria applied have not been tailored or developed to more appropriately draw out the 'special qualities' of a landscape. TEP disagrees with this statement as the definition of 'landscape value' in Natural England's Landscape Character Assessment Guidance is relatively concise and is elaborated by GLVIA3's criteria. The criteria used in Guidance for Assessing Landscapes for Designation as National Park or Area of Outstanding Natural Beauty in England (2011) are similar to GLVIA3 and discussed in more detail at paragraphs 3.14-3.17 below.

Lack of Transparency in Application of Criteria

3.13 The representation considers that no evidence has been provided in respect of the 'weighting' of landscape value criteria and that the evidence base lacks transparency and robustness. TEP considers that the SLA report is set out in a logical manner, setting out the planning policy context, defining criteria, reviewing the SLA designation in accordance with these criteria and making evidence-based recommendations. In TEP's professional experience it has not encountered landscape value criteria being given express 'weighting' in any guidance or practice. Accepted practice points to the use of sound professional judgement in the application of criteria and TEP considers that decisions to include some areas in the SLA and not others is clearly evidenced. The representation makes positive reference to the South Northamptonshire SLA Study (considered in more detail at paragraph 3.24), however review of that Study reveals no 'weighting' of landscape value criteria.
The Landscape Statement (at paragraph 3.24) states that Natural England has a paper setting out the approach to considering landscapes to be designated as Areas of Outstanding Natural Beauty (AONB)\(^1\) and that it provides useful background to current techniques, alongside An Approach to Landscape Character Assessment\(^2\), to form the basis for local landscape designation reviews.

The process of designating a new AONB requires the assessment of landscapes against statutory designation criteria, including characterisation and spatial framework, evaluation against natural beauty criteria and consideration of desirability to designate.

The Natural England guidance sets out the evaluation of a landscape area under consideration against a number of technical criteria including factors similar to GLVIA3’s criteria for identification of valued landscapes. It uses a similar approach to the SLA Study and concludes the assessment with the desirability to designate based on professional judgement. At no point are the statutory designation criteria weighted or scored.

Core Task 3 of Daventry Local Plan Part 2's landscape evidence base considers the case for land in the District suitable for AONB designation. The scope of the report was to make a preliminary assessment of the suitability of the Special Landscape Areas' for potential AONB status; it assesses those landscapes against a selection of the statutory designation criteria and follows the process and recommendations of the Natural England Guidance.

Guidance does not advise that all criteria need to be met for special qualities to be identified and does not advise that weighting should be applied to criteria. The consideration is an exercise of professional judgement informed by considering the aspects identified in guidance. This has been applied in the SLA Study.

**Incorrect Basis for Removal of Landscape Character Types**

The representation states that there is no planning requirement for a designation to cover the same character type or area. TEP concurs with this as the Hemplow Hills, Cottesbrooke and Brington (HHCB) SLA includes two landscape character types (LCTs): LCT 1 Ironstone Uplands and LCT 13 Undulating Hills and Valleys. The approach has not set as a basis that an SLA can comprise only one LCT.

The representation makes the case that the River Valley Floodplain LCT (Brampton Valley Floodplain Landscape Character Area) and the Rolling Ironstone Valley Slopes LCT (Hanging Houghton Landscape Character Area) enable the appreciation of the HHCB SLA from the east with views and the appreciation of rolling landform. TEP agrees with this assessment but these factors do not provide a sufficient case for SLA designation as there were insufficient demonstrable physical attributes to distinguish the area from the wider countryside.

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\(^1\) Natural England (2011), Guidance for Assessing Landscapes for Designation as National Park or Area of Outstanding Natural Beauty in England

\(^2\) Natural England (2014), An Approach to Landscape Character Assessment
3.21 The representation includes a number of photographic viewpoints, some which are designated views in the BNDP, to demonstrate some of the landscape features of the locality and their distinctiveness. There are viewpoints from the River Valley Floodplain LCT and the Rolling Ironstone Valley Slopes LCT looking west towards the HHCB SLA. With viewpoints in the HHCB SLA looking east towards River Valley Floodplain LCT, the Rolling Ironstone Valley Slopes LCT and Brixworth settlement.

3.22 During its site visit in March 2018, TEP took photographs from some of the above viewpoints (see Figure 2). The photographs are annotated and confirm some of the landscape features that demonstrate aspects of the landscape value criteria for different areas in and outside of the proposed SLA. The annotations include detractors in the vicinity of Brixworth which provide some of the rationale for not including the land in the SLA. More detail on the assessment of landscape features is provided for the photo viewpoints in Chapter 4.0.

Lack of Clarity in Judgements

3.23 The representation suggests there is a lack of clarity in judgments such as 'insufficient distinctiveness to warrant designation as an SLA'. However the Review of the SLA study clearly sets out where it considers areas of landscape do not sufficiently meet the criteria for designation. For example at paragraph 4.20 of the SLA study, parts of the Rolling Ironstone Valley Slopes LCT in the vicinity of Brixworth have been assessed as to have been influenced by urbanising features or agricultural intensification and not representative of the upland landscape of the HHCB SLA. In Appendix 1 of the same study, paragraphs 1.2 to 1.5 provide further detail in this respect.

South Northamptonshire SLA Review (2017)

3.24 The representation refers to the recent South Northamptonshire SLA Review, the neighbouring district to the south of Daventry. The representation acknowledges at its paragraph 3.23 that 'there is no specific formal guidance available in England to inform the assessment and designation of locally designated landscapes'. The South Northamptonshire review of the SLAs uses six criteria: distinctiveness, perceptual character, landscape and scenic quality, natural character, cultural character and function, although notably the source of those criteria is not clarified. For each of the SLA areas, the study makes reference to key landscape features in the district, with a supporting statement giving detail to the importance and special qualities of the designated areas which aims to encapsulate its special landscape character and give identity to its overall value and distinctiveness. A list of Special Qualities provides a summary as to why and what is valued about the designated landscape. This approach is similar to the Daventry Study following a series of logical steps and providing an overall assessment and conclusion based on professional judgement.
3.25 The representation suggests that the South Northamptonshire study uses a holistic approach as part of identifying the special features that add value and warrant protection through the six criteria. TEP considers that this is very similar to the approach taken in the Daventry Study where each criteria is considered individually and then the assessment of the suitability to designate is based on professional judgement. Consideration also is given to the *Justification of Need, Landscape Setting and Key Management Recommendations*.

**Vulnerability to Development**

3.26 TEP appreciates concern expressed about the removal of the area west of Brixworth from the SLA and that it is landscape valued by the community of Brixworth. In terms of vulnerability to development it is relevant that the Council's criteria based policy ENV1 Landscape from the emerging draft Local Plan sets out protection of character and quality of the District's landscapes. The policy refers to criteria to respect distinctiveness, the avoidance of harm to landscape character and views and the expectation that landscape features are enhanced and restored where the opportunity arises.

3.27 The policy also makes reference to the Daventry Landscape Capacity Assessment Toolkit that provides a framework for making decision relating to specific development proposals, to help identify the landscape's sensitivity to any proposed change and whether the landscape has the capacity to accept the change without adverse impact.

3.28 This confirms the Council's robust policy approach towards any proposed development that would cause harm to landscape character and views.

**Retention of Existing SLA Boundary**

3.29 The representation makes the case that the existing SLA boundary (saved policy ENV1 1997) should be retained. However, TEP stands by the evidence base of the SLA Study and confirms its professional opinion that retaining the area to the west of Brixworth does not sufficiently meet the criteria for SLA designation. Further the Council has a robust policy approach towards any proposed development that would cause harm to landscape character and views.
4.0 Consideration of Photo Viewpoints

4.1 During its site visit of 19th April ‘18, TEP visited some of the viewpoints (see Figures 1 and 2) referred to in the Huskisson Brown Landscape Statement. The purpose of the visit and consideration of the photo viewpoints was to provide further analysis of the Parish Council’s representation, with reference to the landscape evidence base in preparation of the Local Plan and the factors that help in the identification of valued landscape. The visit assisted the ‘back-check and review’ of the SLA Study to consider the issues raised in the representation.

4.2 The table below confirms those viewpoints visited with cross referencing to the Huskisson Brown report and the Brixworth Neighbourhood Development Plan designated viewpoints where relevant (see Table 4.1).

*Table 4.1*

<table>
<thead>
<tr>
<th>TEP Viewpoint</th>
<th>Huskisson Brown viewpoint reference</th>
<th>BNDP designated view reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A - View from Northamptonshire Round looking north west towards Spratton</td>
<td>10</td>
<td>n/a</td>
</tr>
<tr>
<td>B - View from Northamptonshire Round looking north east towards Brixworth</td>
<td>10</td>
<td>7</td>
</tr>
<tr>
<td>C - View from Brampton Valley Way looking west towards Spratton</td>
<td>6</td>
<td>n/a</td>
</tr>
<tr>
<td>D - View from Brampton Valley Way looking east towards Brixworth</td>
<td>5</td>
<td>9</td>
</tr>
<tr>
<td>E - View from Brixworth Road (Creaton) looking south east towards Brixworth</td>
<td>9</td>
<td>n/a</td>
</tr>
<tr>
<td>F - View from rural lane looking west towards Teeton</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>G - View from Teeton Road looking north towards Ravensthorpe Reservoir and Coton</td>
<td>n/a</td>
<td>n/a</td>
</tr>
</tbody>
</table>
**Viewpoint A**

4.3 The TEP photograph is taken from Merry Tom Lane outside the proposed SLA boundary with views across the Brampton Valley towards Spratton which is in the SLA.

4.4 Land in the foreground is not in the SLA and characterised by a large arable field with evidence of previous field amalgamation and limited enclosure from hedgerows and hedgerow trees. Further it does not demonstrate the features below.

4.5 Land in the distant view is in the SLA and there are a number features highlighted in the Daventry SLA Study including that the landscape condition is judged to be good, with hedgerows and wooded areas intact. The wooded profile of the ridgeline, distinctive rounded copses capping hills and vista towards the church spire nestling in trees contribute to scenic quality. The fine grained field pattern contributing to the setting of the village and patchwork effect of a combination of frequent trees, hedgerows and copses contribute to the perceptual quality of the landscape. These features contribute to the landscape value criteria and the SLA designation.

4.6 The corresponding Huskisson Brown photograph (10) extends from Spratton across to Brixworth. It points out the Spratton and Creaton Ironstone Uplands Landscape Character Area which forms a backdrop to the east facing Brampton Valley Slopes. It suggests that the perception is that the east facing slopes extend to the opposite valley side upon which Brixworth is located. The photograph indicates which land is inside the proposed SLA boundary and which is outside the boundary and the distinction between them is described above.

**Viewpoint B**

4.7 The TEP photograph is taken from the same position as viewpoint A outside the SLA boundary. In the foreground are large arable fields with evidence of previous field amalgamation and limited enclosure from hedgerows and hedgerow trees. This pattern extends to the edge of the settlement. In the distant view is the largely exposed urban edge to Brixworth, with building form on the skyline and limited backgrounding from vegetation. These would be detracting features in the consideration of the local landscape designation.

4.8 The Huskisson Brown photograph (10) extends into part of viewpoint B.

**Viewpoint C**

4.9 The TEP photograph is taken from the Brampton Valley Way just outside the eastern SLA boundary with views west across the Brampton Valley towards Spratton. In the middle distance is a wooded copse and mature hedgerows enclosing pastoral land with the Spratton church spire in the distance (all in the SLA). There is evidence of landscape condition judged to be good, with hedgerows and wooded areas intact. The mature hedgerows and wooded copse combine to create a patchwork effect on the skyline and there is a distant views towards the church spire. The elements contribute to the perceptual quality of the landscape.
4.10 The corresponding Huskisson Brown photograph (6) notes the similarities to the landscape on the eastern side of the valley (photograph 5), in the landform, tree cover, church spire and vegetation on the skyline. However, there is evidence in photograph 6 (in SLA) of a more intact hedgerow network in mature condition.

**Viewpoint D**

4.11 The TEP photograph is taken from the Brampton Valley Way just outside the proposed SLA boundary with views east towards Brixworth. In the middle distance is the wooded north western edge to the settlement and the church spire nestling in trees. There is also a wooded copse in the near view.

4.12 In the view the localised area of landscape has some mature hedgerows and wooded copses that combine to create a patchwork effect on the skyline and there is a view towards the church spire nestling in trees. Although these features show some of the characteristics of the SLA and some level of distinctiveness, this is a localised view, without the urbanising effect of features characteristic of other wider views towards Brixworth.

4.13 The corresponding Huskisson Brown photograph (5) points out the ridgetop location of Brixworth and landmark church spire in trees on the skyline in the localised view described above.

**Viewpoint E**

4.14 The TEP photograph is taken from Brixworth Road (Creaton) just inside the proposed SLA boundary with views east towards Brixworth. Most of the landscape in the view would be outside the SLA. In the distance there are the partly wooded slopes up to the western side of the settlement with the mature hedgerows and wooded copses combining to create a patchwork effect. The wooded north western edge of the settlement and church spire nestling in trees is also in the view. These features show some of the characteristics of the SLA and some level of distinctiveness but the urbanising effect of the factory complex to the north eastern edge of the settlement is a detracting feature in the consideration of the local landscape designation.

4.15 The corresponding Huskisson Brown photograph (9) is taken from the same location but taken in a south easterly direction and it does not include the factory complex to the north west of the settlement. It indicates that the land in the foreground is inside the proposed SLA boundary, with middle ground and background outside the SLA. It is the foreground landscape which has the characteristics of the SLA without the urbanising influences.
Viewpoint F

4.16 The photograph is taken from a country lane looking west towards Teeton. Land is sloping up towards the small settlement with hedgerows and frequent hedgerow trees leading up to a copse capping the small hill at Teeton. These features contribute to the landscape value criteria and the SLA designation. The condition of the landscape would be judged to be in good condition, with features such as hedgerows, hedgerow trees and copses intact. The distinctive rounded copses capping the small hill in the view provide a reference point in the landscape aiding orientation and contribute to scenic quality. The outline and profile of the ridgeline on the skyline with the patchwork effects created by the combination of frequent trees, hedgerows and copses contribute to the distinctive character and is a feature in views. These features contribute to the perceptual quality of the landscape.

Viewpoint G

4.17 The photograph is taken from Teeton Road looking north towards Ravensthorpe Reservoir, with the backdrop of rising farmland, hill top villages and wooded fringes integrates with the surrounding area creating memorable and distinctive landscapes not present elsewhere in the District and contributing to rarity.
5.0 Summary

5.1 The representation by Brixworth Parish Council to the Emerging Draft Local Part 2 Consultation considers the landscape evidence base does not make sufficient reference to the Brixworth Neighbourhood Development Plan (BNDP). It considers that there are other faults in the assessments undertaken leading to the proposal to amend the SLA boundary.

5.2 The BNDP indicates that land to the west of the parish is of 'High Sensitivity' and there are a number of designated 'Important Views'. The same land and views are highly valued by the community.

5.3 The Landscape Statement by Huskisson Brown Associates considers that there is an incorrect emphasis on NPPF policy protecting 'valued landscapes' and that the policy context appears to be confused in terms of whether the policy evidence base is addressing valued landscapes or special landscape qualities it seeks to protect.

5.4 The Statement suggests that the criteria for the identification of valued landscapes in the SLA Study taken from Guidelines for Landscape and Visual Impact Assessment 3 (GLVIA3) are not wholly appropriate for assessing a Special Landscape Area (SLA). It goes onto to challenge the SLA Study in that it provides no information to identify how the criteria against which it judges landscape value are weighted or disaggregated suggesting that each of the criteria are ‘scored’ equally.

5.5 The Statement challenges the removal of areas of landscape on a character type basis and makes reference to the recent South Northamptonshire SLA Review considering that it uses a more holistic approach.

5.6 The Statement considers the removal of the area west of Brixworth from the SLA would potentially damage the special qualities of this landscape and it would make it more vulnerable to development. The Statement concludes that the evidence used to amend the existing SLA boundary is not sufficiently robust and that the existing SLA boundary (saved policy ENV1 from Local Plan 1997) should be retained.

5.7 TEP has reviewed the scope and content of the representation. TEP concurs that the 'High Sensitivity' landscape and designated views from the BNDP contribute to and enable the appreciation of the landscape and the wider countryside. TEP confirms that the landscape policies in the Council's Emerging Local Plan Part 2 are sufficient to protect the District's landscape character from development proposals that would cause landscape harm.

5.8 In terms of the GLVIA3 criteria, TEP's experience in professional practice, including public and Local Plan inquiries is that the criteria are applicable to any type of assessment considering landscape value.
5.9 In respect of landscape value criteria being given express 'weighting' in guidance or practice, TEP has not encountered this in its professional experience. Accepted practice points to the use of sound professional judgement in the application of criteria and TEP considers that decisions to include some areas in the SLA and not others is clearly evidenced.

5.10 TEP concurs that there is no planning requirement for a designation to cover the same character type or area and considers it uses a similar approach to the South Northamptonshire SLA Study in considering each criteria individually and then assessing the suitability to designate based on professional judgement.

5.11 The representation makes the case that the existing SLA boundary (saved policy ENV1 1997) should be retained. However, TEP stands by the evidence base of the SLA Study and confirms its professional opinion that retaining the area to the west of Brixworth does not sufficiently meet the criteria for SLA designation. Further the Council has a robust policy approach towards any proposed development that would cause harm to landscape character and views.
References

Any sources are confirmed in the footnotes of the report.
FIGURE A
Special Landscape Area and Viewpoint Locations

- **LCT 1: Ironstone Uplands**
  - 1a Guilsborough Ironstone Uplands
  - 1b Spratton and Creaton Ironstone Uplands

- **LCT 4: Rolling Ironstone Valley Slopes**
  - 4a Harlestone Heath and the Bramptons
  - 4b Moulton Slopes
  - 4d Hanging Houghton
  - 4e Pitsford Water

- **LCT 5: Clay Plateau**
  - 5a Naseby Plateau

- **LCT 13: Undulating Hills and Valleys**
  - 13c Long Buckby
  - 13d Cottesbrooke and Arthingworth

- **LCT 17: River Valley Floodplain**
  - 17c Brampton Valley Floodplain

**Key**
- Existing SLA boundary (1997)
- Proposed SLA boundary (2017)
- Photograph viewpoint location (cross reference with Landscape Statement by Huskisson Brown Associates where applicable)

**Landscape character areas (Daventry Landscape Character Assessment 2017)**

- **LCT 1: Ironstone Uplands**
  - 1a Guilsborough Ironstone Uplands
  - 1b Spratton and Creaton Ironstone Uplands

- **LCT 4: Rolling Ironstone Valley Slopes**
  - 4a Harlestone Heath and the Bramptons
  - 4b Moulton Slopes
  - 4d Hanging Houghton
  - 4e Pitsford Water

- **LCT 5: Clay Plateau**
  - 5a Naseby Plateau

- **LCT 13: Undulating Hills and Valleys**
  - 13c Long Buckby
  - 13d Cottesbrooke and Arthingworth

- **LCT 17: River Valley Floodplain**
  - 17c Brampton Valley Floodplain

**Key**
- Existing SLA boundary (1997)
- Proposed SLA boundary (2017)
- Photograph viewpoint location (cross reference with Landscape Statement by Huskisson Brown Associates where applicable)
FIGURE B
Viewpoint A - View from Northamptonshire Round looking north west towards Spratton
(Viewpoint 10 - Huskisson Brown Landscape Statement (2018))

Viewpoint B - View from Northamptonshire Round looking north east towards Brixworth

Note - Where applicable cross reference with photo viewpoint locations from Huskisson Landscape Statement (2018)
Viewpoint C - View from Brampton Valley Way looking west towards Spratton
(Viewpoint 6 - Huskisson Brown Landscape Statement (2018))

Viewpoint D - View from Brampton Valley Way looking east towards Brixworth
(Viewpoint 5 - Huskisson Brown Landscape Statement (2018))
Viewpoint E - View from Station Lane looking south east towards Brixworth
(Viewpoint 9 - Huskisson Brown Landscape Statement (2018))

Urbanising effect of factory complex on skyline
Church spire at Brixworth
Wooded edge to village
Viewpoint F - View from rural lane looking west towards Teeton

Distinctive rounded copses capping small hills

Viewpoint G - View from Teeton Road looking north towards Ravensthorpe Reservoir and Coton

Large historic reservoirs framed by undulating ridgelines, trees and hill top villages
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