



Daventry Local Plan (Part 2) - Statement to Matter 5

for Grasmere Strategic Land (Northampton)
Respondent PS083

Project : 14-116
Site address : Representations to the
Daventry Local Plan
(Part 2)
Client : Grasmere Strategic Land
(Northampton)
Date : May 2019
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1. Introduction

- 1.1 Emery Planning is instructed by Grasmere Strategic Land (Northampton) to make further written representations to the Examination of the Part 2 Plan. We made detailed representations to the Submission Draft.
- 1.2 Our specific interest is the land south of Boughton Road, Moulton which is addressed in Section 2 of our representations. This is referred to as site PS083 in EXAM 1E.
- 1.3 In summary our representations are on the following basis:
- The omission of the site as an allocation in the local plan;
 - An objection to the designation of the site as Green Wedge (Policy EV3);
 - An objection to the wording of Policy EV3;
 - Seeking greater flexibility in the plan to provide housing sites to meet Northampton's housing needs.
- 1.4 We rely on our submitted representations and our responses below are specific to the Inspector's questions in the MIQs for Matter 5 on Green Wedges.

2. Matter 5

Policy EV3 Green Wedge

2.1 Our objections to the Submission Draft had two strands; which were:

- Our client's site should be removed from the EV3 designation; and,
- The wording of the policy should be amended.

2.2 Those objections remain and in that context we now assess the Inspectors Questions.

3. Question 5

Is the level of protection afforded to land proposed to be designated as a Green Wedge necessary when taking account of other policies in the Plan, including those relating to Open Countryside (Policy RA6), Landscape (Policies ENV1 and ENV2) and Green Infrastructure (Policy ENV4)?

3.1 Policy EV3 states:

"A. To protect the identity, character and setting of settlements within the areas that fringe Daventry and Northampton proposals within the Green Wedges will be required to demonstrate that they would maintain:

- i. The physical and visual separation between settlements; and*
- ii. The openness around settlements and their settings.*

B. The Council will support proposals that contribute towards increased public access to, and enjoyment of, the Green Wedges, particularly from the Sustainable Urban Extensions in the Northampton Related Development Area, providing they are compatible with i) to ii) above.

The designated areas of Green Wedge are shown on the Policies and Inset Maps."

3.2 We have a specific objection to Part A(ii) of the policy. This is because the openness around settlements and their settings have no bearing on the status of a gap between settlements which is to protect the identity and distinctiveness of settlements. That point is covered in parts Ai and Aii of Policy ENV1. Therefore we propose that Part A(ii) is deleted.

- 3.3 Parts Ai and Aii of Policy ENV1 also apply to Part A1 of ENV3, so we do agree with the contention in the question that other policies do provide the same level of protection and whether ENV3 is required.
- 3.4 However should the Inspector conclude that ENV3 remains, then we propose the following wording which is based on Policy EN4 of the Preston Local Plan. We were involved at the Examination and the policy was amended in order to be permissive of development provided the aims and objectives of the policy were not adversely affected. On that basis we would propose that Parts A(i) and A(ii) of Policy EV3 are deleted and the following text inserted.

“Development will be assessed in terms of its impact upon the Green Wedge including any harm to the effectiveness of the gap between settlements and, in particular, the degree to which the development proposed would compromise the function of the Green Wedge in protecting the identity and distinctiveness of settlements.”

4. Question 6

Was the methodology used to identify the proposed Green Wedges and their boundaries, appropriate and did it take account of the potential effect of the Northampton North West Relief Road?

- 4.1 No. We consider that the ENV3 designation is a continuation of the Green Wedge policy in the 1997 Local Plan and a full review has not been undertaken. As we have set out in answer to Q5, other policies in the Plan would achieve the same aims and objectives. We have suggested changes to ENV3 in our representations should the designation remain.
- 4.2 Our second issue is how changes to the Green Wedge were made. From our review of the evidence there are a number of changes to the Green Wedge designation from the 1997 plan in the area around Moulton, these being:
- the land to the east of our client's land has been removed from the Green Wedge. This is due to the allocation (H4) in the Moulton Neighbourhood Plan;
 - the land to the north is now part of the settlement boundary. This is due to the consent on the Salisbury Landscapes site which is under construction.
 - The land that lies to the north of Northampton which was designated as Green Wedge in the 1997 local plan is now designated as Green Wedge.

- 4.3 The changes to the boundaries are based on what has transpired through planning consents rather than a fundamental review to take account of changed circumstances. We use our client's site as an example where due to the changes now made, then the Green Wedge is no longer applicable to our client's site as neither the western or southern edges of Moulton would come materially closer to Northampton.
- 4.4 We also have concern that the Daventry Landscape Assessment does not deal with sites in isolation but are assessed as part of a wider parcel. This is a blunt tool to consider the Green Wedge designation as some sites within the wider parcel would have limited or no impact on the wider aims and objectives. Our representations on our client's site illustrate this point. However as no finer grain assessment is undertaken, the Green Wedge designation is then carried forward as to how sites are assessed in the HELAA and also as they are now presented in EXAM 1E, i.e. being in the Green Wedge.
- 4.5 We appreciate that the work required for a finer grain assessment could be significant but at least the assessment should assess sites put forward through the plan process. Indeed when sites are assessed individually, then the true impact can be judged. For example, the issue of development in the Green Wedge was considered on the Salisbury Landscapes site and the Hallam Land site at Moulton. In both cases they were released from the Green Wedge. In the appeal decision¹ for Salisbury Nurseries, the Inspector concludes:

"60. I therefore conclude that whilst the appeal proposal would result in some limited harm resulting from the perceived loss of openness at the appeal site, any harm would be minor and the proposal would not be incongruous with the open and green character of the site or significantly visible in short and long term views. Furthermore, due to the particular topography and verdant qualities of the site, the appeal proposal would not weaken the important objective of the green wedge to prevent coalescence. Overall I do not consider the integrity of the green wedge at this location would be undermined by the appeal proposal and as such the proposal would not compromise the objectives of DDLP Policy EN10.

- 4.6 For Site H4 the Examiners Report states:

"6.8 I am satisfied that, in terms of the effect of the allocation on the identity of Moulton and its separation from Northampton, the new housing together with other elements in the allocation is acceptable. I noted from my own visits that the topography of the site slopes away from Northampton. I also note the professional advice of the Council's Landscape Officer on the application for

¹ Appeal Decision APP/Y2810/A/14/2225722

the recent 125 home scheme that:... in landscape terms there will still be a physical distinction..." and his conclusion that "... I believe in landscape terms the proposed development can be incorporated within the landscape and still provide the distinction between Moulton and Northampton." I consider this allocation constitutes positive planning and promotes sustainable development and is appropriate having regard to national policy."

- 4.7 We therefore use our client's land as an example to demonstrate why the methodology for the Green Wedge designation is not justified why a more forensic assessment of sites is required if the policy is to remain.