Settlements and Countryside Local Plan (Part 2)
for Daventry District

Examination Statement

Matter 5: Built and Natural Environment

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For:
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(edp3630_d013a_04 October 2018 WG/OK)
Section 1
Matter 5: The Built and Natural Environment

Green Wedges (Policy ENV 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)?

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?

Introduction

1.1 This statement has been produced to inform the Examination of the emerging Daventry Settlement and Countryside Local Plan (Part 2) (the ‘emerging LP’) prepared by Daventry District Council, in particular Matter 5 the relating to the Environment.

1.2 EDP has been commissioned by Christ Church, Oxford to review the emerging policy ENV 3 in the emerging LP with specific regard in the context of potential development on land at Drayton Gate Farm, Daventry referred to as ‘the potential development site’ within this report. The location of the potential development site is illustrated at Appendix EDP 1.

Summary of Matters to be addressed

1.3 This Statement particularly addresses the Inspectors’ questions 5 and 6 of Matter 5, having regard to the evidence base, National Planning Policy Framework (NPPF) 2012, and site related observations and landscape studies, including edp3630_roo2b – Representations in respect of Landscape Matters submitted as part of the Regulation 19 representations (assigned representation ID PS091/04).
Section 2
Consideration of Questions 5 and 6 Overview

2.1 The following ‘local’ landscape policies are proposed within the emerging local plan.

- Policy ENV 1 – Landscape;
- Policy ENV 2 – Special Landscape Areas;
- Policy ENV 3 – Green Wedge;
- Policy ENV 4 – Green Infrastructure; and
- Policy RA 6 – Open Countryside.

Summary of Previous Representations

2.2 This report addresses the landscape matters embedded in the emerging ‘Green Wedge’ (Policy ENV 3) from the emerging Settlements and Countryside Local Plan (Part 2) as set out below:

“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.”

2.3 A detailed representation was submitted in response to the Regulation 19 consultation. Those representations included a technical paper in the form of ‘Representations in respect of Landscape Matters’ (edp3630_ro02b). In summary, the concept of a ‘Green Wedge’ is not formally recognised by national policies, including in the context of the National Planning Policy Framework (NPPF). Whilst the Framework provides general planning guidance relating to the protection of valued landscapes and the designation of ‘Local Green Space’ it does not set out any guidance specific to ‘Green Wedges’.

2.4 The Green Wedge policy in this instance is clearly not intended to form the function of a Local Green Space designation – areas have not been identified through a local and/or neighbourhood planning process. Furthermore, it must be noted that the NPPF makes clear that Local Green Space designation will not be appropriate for most green areas, nor extensive tracts of land – which evidently Green Wedges (Policy ENV 3) constitute.
Policy ENV3 is constructed in a way that fundamentally conflicts with national policy, insofar as the policy is tantamount to an outright preclusion of built development, and furthermore takes no account of meeting development needs. The policy allows for no balancing of adverse and positive effects of development on the Green Wedge, or of the wider benefits of sustainable development.

Such an approach is inconsistent with the Framework as it ignores the presumption in favour of sustainable development. Paragraph 151 of the Framework states that:

“Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.”

A ‘wedge’ should not encircle urban areas and should provide for intervening development growth and sustainable transport corridors. Furthermore, they should be demonstrably ‘valued’ areas of landscape with permeance, community support and associated green infrastructure services.

Paragraph 113 of the NPPF (2012) states that LPAs should:

“Set criteria-based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.”

The policy as written presumes that the ‘Green Wedge’ areas have some value greater than other areas in the district, however, at present there is no ‘reasonable justification’ other than the areas being undeveloped, and at the settlement edge, for this to be the case.

In relation to the potential development site, the land parcels are undesignated ‘open countryside’ (land which does not display qualities of a ‘valued’ landscape in the context of paragraph 109). Therefore, whilst it exhibits some intrinsic value, it does not exhibit qualities to elevate it above that of any other undesignated agricultural land surrounding Daventry. The site contains no notable landscape features beyond hedgerows and trees which form the boundaries. The visual character of the site is unexceptional. Furthermore, any sense of tranquillity is impacted due to the surrounding commercial units. In neither a topographic nor a spatial sense does the development potential of the site appear to conflict with the established pattern of development nor threaten the identity of Braunston.

Objection has been raised to the principle of Policy ENV3 (Green Wedges) on the basis of other definitive policies within the emerging Local Plan that will guide development both within and outside of the built up area (e.g. Policy ENV1). Policy ENV3 is not therefore justified and should be removed in order that LPP2 can be found sound.
If the policy principle of the Green Wedge (ENV3) is retained, its area should be re-drawn as shown on Appendix 1: EDP 5 – Site Appraisal. The extent of land identified by ENV3 at this specific location is not required to meet the objective of preventing coalescence.

**Inspector’s 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)?*

The wording of Policy ENV3 proposes the designation of extensive areas of agricultural land parcels as Green Wedges based on:

- Location at the settlement edge; and
- Openness.

It is clear from both of EDPs assessments submitted as part of our Client’s Regulation 19 representations (representation ID PS091/04), that the land comprising the proposed development area is well below the threshold which might result in land being considered ‘valued’ under the auspices of paragraph 109 of the Framework/sufficient to be considered as a local landscape designation. Therefore, it is considered that the policy does not, and should not, constitute the protection of landscape value; the implementation of ENV3 appears to be solely to act as a spatial planning tool.

Furthermore, the policy wording introduces the concept of ‘openness’ as a demonstrable landscape characteristic. However, such considerations are not reflective of any nationally accepted standards for the assessment of landscape value, such as the GLVIA. Indeed, the methodology appears to be based on the assumption that all settlements and areas of residential development are sensitive (‘vulnerable’) to development and require protection. In this instance it seems that there is an unnecessary conflation of matters between the purposes of Policy ENV3 and, for instance, Green Belt policy.

In terms of protecting landscape value and character, the emerging local plan already contains policy which consider landscape matters. Policy ENV1 for example is sufficiently worded to meet such objectives:

> "The Council will support proposals that maintain the distinctive character and quality of the District’s landscapes, as defined in the Daventry District Landscape Character Assessment 2017. In particular, development will be expected to:"

- *Respect the local distinctiveness and historic character of the particular landscape character area in which it is located; and*
ii. **Respect existing patterns of development** and distinctive features that make a positive contribution to the character, history or setting of a settlement or area such as key buildings, village skylines and ridgelines; and

iii. **Avoid creating hard developed edges to the open countryside; and**

iv. **Avoid physical and visual coalescence between settlements; and**

v. **Enhance and restore landscape features where the opportunity arises; and**

vi. **Incorporate mitigation measures to integrate development into its surroundings and enhance or restore the local landscape.**

2.17 Furthermore, the emerging plan has already created a level of local landscape designation in Policy ENV 2 (Special Landscape Areas), which the proposed development area does not fall within. Therefore, it must be assumed that the LPA does not consider it to be sufficiently ‘valued’ for it to be incorporated into the Policy ENV 2 area.

2.18 As per our client’s submission at the Regulation 19 stage, Policy EN3 is not necessary when taking into account other policies of the plan.

**Inspector’s 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?

2.19 There is an absence of assessment to justify the allocation of this land in landscape terms. The assessment is contained within Daventry Landscape Assessment – CT4 Policy Approach to Daventry Fringes. Whilst this document acknowledges that the proposed development is separated from the settlement edge of Braunston by an area of undulating land and summarises historic studies which identify a low sensitivity across much of the site, it concludes that it should be protected from development by inclusion within a ‘green wedge’. As highlighted within previous submissions (edp3630_r002b – Representations in respect of Landscape Matters). There is an absence of reasonable justification or objective assessment, other than the area being undeveloped, and at the settlement edge.

2.20 If the intent of the policy is to provide Local green space designations, then they should not comprise extensive tracts of land. Having undertaken a measurement exercise of the Policies Map, analysis shows that proposed green wedge which forms land unit DA1 is 83ha. Self-evidently these proposed designations represent extensive tracts of land.

2.21 This approach is not consistent with the provisions or intentions of the Framework, and represents an unsound basis for plan-making. In light of conclusions set out by EDP’s ‘Representations in respect of Landscape Matters’ (edp3630_r002b) the Green Wedge at
Drayton Gate Farm is unduly expansive and disproportionately restrictive. Based on landscape evidence presented by EDP it is suggested that, if the policy principle of the Green Wedge is retained, its area should be re-drawn as per Appendix 1 (EDP 5 – Site Appraisal). The extent of land identified by ENV3 at this specific location is not required to meet the objective of preventing coalescence and, if retained, the policy boundary should be amended in order to take account of existing landscape features.

Conclusions

2.22 As illustrated at Appendix EDP 1, development of the field parcels within the Drayton Gate Farm area of the site would, at worst, only result in a small reduction in the 'gap' between Daventry and Braunston. A separation distance of at least 1.49km would remain. Furthermore, should the site come forward, it is recommended that the existing trees and hedgerows are retained and where possible enhanced with gap planting. Enhancement of the existing structural tree/woodland planting along the north-western boundary would contain development, contribute to the existing development edge and provide biodiversity enhancement.

2.23 The land parcels are undesignated 'open countryside' (land which does not display qualities of a 'valued' landscape in the context of paragraph 109). Therefore, whilst it exhibits some intrinsic value, it does not exhibit qualities to elevate it above that of any other undesignated agricultural land surrounding Daventry. This portion of the site contains no notable landscape features beyond hedgerows and trees which form the boundaries. There is no reason to believe that the vast majority of these features could not be maintained, protected and enhanced within a sensitive development layout. The visual character of the site is unexceptional.

2.24 Furthermore, any sense of tranquillity is impacted due to the surrounding commercial units. In neither a topographic nor a spatial sense does the development potential of the site appear to conflict with the established pattern of development nor threaten the identity of Braunston.

2.25 The provision of ENV 3 is not necessary when considered alongside policies ENV 1, 2, 4 and RA6. Furthermore, it is not NPPF compliant, nor is it justified by sufficiently detailed level of assessment. Our client maintains its position that Policy ENV3 should therefore be deleted.

2.26 However, if retained, it should be redrawn as illustrated at Appendix EDP 1.
Appendix EDP 1

Site Location and Policies Plan

(edp3630_d013a 04 October 2018 WG/OK)
Rolling landscape to the north-west of site provides separation and prevents coalescence between Daventry and Braunston.

Existing structural landscaping belt of coniferous and deciduous trees adjacent to mature field boundary.

Drayton Fields Industrial Estate exerts an urbanising influence over the countryside to the north and west.