



**DAVENTRY DISTRICT SETTLEMENTS AND COUNTRYSIDE  
LOCAL PLAN EXAMINATION**

**STATEMENT ON BEHALF OF:  
MILLER HOMES - Respondent Reference PS058**

**MATTER 8: Community and Wellbeing**

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## **MATTER 8: Community and Wellbeing**

### **Issue:**

Whether the approach to community and wellbeing is positively prepared, justified, effective and consistent with national policy.

### **Questions**

#### **Local Green Space (Policy PA1)**

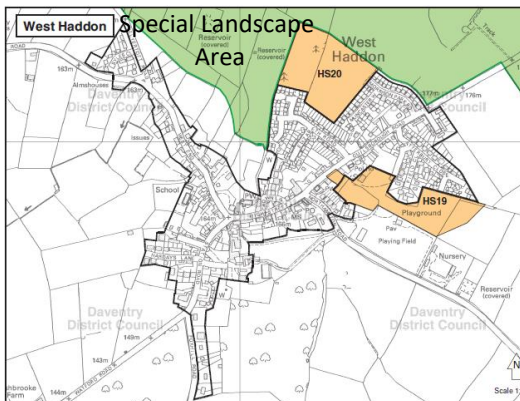
7. *Was the methodology used to identify the proposed Local Green Space designation and their boundaries, consistent with national policy?*
8. *Are there any factors that indicate that any of the proposed Local Green Spaces identified should not have been designated? If so, what evidence is available to support this position?*
- 8.1 Policy PA1 states that the Council will protect Local Green Spaces identified on the Inset Maps unless in very special circumstances where any harm is outweighed by other considerations. The designations include land at West Haddon (Old Rec) which Miller Homes has an interest in.
- 8.2 The approach the Council has taken has been to carry forward designations from made Neighbourhood Plans into the Part 2 Plan without any review. The Local Green Space Assessment, 2018 does not provide an assessment of those local green spaces identified in Neighbourhood Plans.
- 8.3 This is inappropriate, and the Council should have undertaken a robust assessment of the appropriateness of designating all proposed local green spaces in the Part 2 Local Plan, including those identified in Neighbourhood Plans in accordance with the NPPF.
- 8.4 Paragraph 77 of the 2012 NPPF is clear that Local Green Space designation will not be appropriate for most green areas or open spaces. The Inspector for the Cheltenham Local Plan Examination in her Post Hearing Advice noted that the NPPF sets a significantly high bar for Local Green Space designation and that care is required to ensure Local Green Space policies are not misused. She commented that whilst it is a consequence of designation that a space will be protected from development, that should not be the primary reason for seeking designation. She went on to review proposed Local Green Space designations and advised that  
  
*"the available evidence must sufficiently demonstrate why sites are 'demonstrably special' and of 'particular local significance' to distinguish*

*them from other green areas and open spaces which have similar features in order to reach the high bar necessary for LGS designation.”*

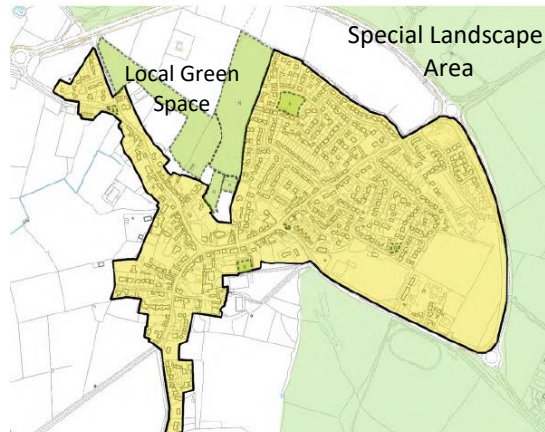
*Paragraph 30, Cheltenham Local Plan Inspector’s Post Hearing Advice,  
9<sup>th</sup> April 2019*

- 8.5 For the West Haddon Neighbourhood Plan it would seem that the desire to protect open spaces from development figured heavily in the local evidence seeking to justify designation. Local evidence cited under Policy WH2 of the Neighbourhood Plan (page 33) includes reference to 97% of residents wanting to protect open spaces from development.
- 8.6 For the land off Elizabeth Road/Victoria Close, West Haddon there has also been a material change in circumstance following the identification of the land as Local Green Space through the Neighbourhood Plan and therefore it should not automatically be transposed into the Local Plan without further proper assessment.
- 8.7 The submission draft version of the Part 2 Daventry Local Plan has amended the Special Landscape Area designation to exclude land south of the A428 West Haddon bypass from the Special Landscape Area. The extracts below show the change to the extent of the Special Landscape Area.
- 8.8 Part of the justification for the designation of the land as Local Green Space through the Neighbourhood Plan was that it was demonstrably special, partly by virtue of its inclusion within the Special Landscape Area.

**Extract from Daventry District Council Local Plan Proposals Map, 1997**



**Extract from Part 2 Local Plan Proposals Map**



- 8.9 This is a material change in circumstance which justifies the need for a review of the proposed designation of land as Local Green Space through the Part 2 Local Plan at West Haddon.
- 8.10 As part of our representations on the Submission Draft Local Plan, we set out the reasons why the land at Elizabeth Road does not qualify as a Local Green Space against the tests set out in the NPPF. In terms of whether the land is demonstrably special, it no longer forms part of the Special Landscape Area and has limited recreational value through the public footpaths crossing the site. The suggestion that there are extensive views over the Special Landscape Area to the north is not accepted. A Landscape and Visual Appraisal undertaken on behalf of Miller Homes demonstrates that these views are not extensive.
- 8.11 Land proposed for designation as Local Green Space involves an extensive tract of land that would effectively place a blanket restriction on future growth of the village to the north-west of the village.
- 8.12 The Council should amend the Proposals Map and Appendix I to remove the Local Green Space designation from land off Elizabeth Road/Victoria Close.