

# **Settlements and Countryside – Daventry Local Plan Part 2 Examination**

Matter 8 – Local Green Space (Policy PA1)

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Camilla Duckworth  
Camilla.duckworth@turley.co.uk

**Client**  
Moulton College

**Our reference**  
MOUQ3003

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# 1. Introduction

1. Moulton College is a Further Education College, based in Moulton. It provides post 16 teaching and research opportunities across a wide range of vocational and academic disciplines. The College's Estate amounts to some 485 hectares, with a further 170 ha of land rented in for livestock farming. College buildings are focussed on four sites, all of which are located to the north of Moulton village.
2. This Statement relates to part of the College's estate which is defined on the plan in Appendix A and which is intended to be designated as Local Green Space under Policy PA1 of the Local Plan.
3. The site comprises 2.1 ha and is accessed via a single width access off Rose Tree Close. It is currently in use for allotment purposes and is leased by the College to a local Community Interest Company. It is our submission that the identified land should not be designated as Local Green Space and that the Local Plan should be modified to exclude this designation.
4. This Statement supplements the formal representations submitted by the College in response to the earlier formal consultation versions of the Plan in January 2018 and October 2018.
5. It responds specifically to questions 7 and 8 under Matter 8.

## 2. Question 7

*Is the methodology used to identify the proposed Local Green Space designation and their boundaries, consistent with national policy?*

2.1 The National Planning Policy Framework (NPPF) provides guidance on the methodology to be adopted in respect of land for open space and recreation. In particular it confirms that:

- Local Green Space designations should be identified through the neighbourhood or local plan process, reflecting the importance placed on them by local communities; that
- Policies should be based on a 'robust and up to date assessment' of need; and that
- Local Green Space should only be designated where a series of specific criteria are met, including that the land should be 'demonstrably special'

2.2 We submit that none these methodology requirements have been met in this case – and can substantiate this as follows.

### b) Neighbourhood Plan Process

2.3 Any Local Green Spaces in or around Moulton, could reasonably be expected to have been identified through the Moulton Neighbourhood Plan process which was subject to widespread consultation (with the parish council, local community groups and residents) and examination in public, leading to its adoption in 2016.

2.4 This expectation is reasonable, particularly as Local Green Space was a specific topic discussed as part of the Examination. Indeed the current submission Local Plan acknowledges at 11.1.01 that the Neighbourhood Plan is the 'most suitable' document to identify and allocate Local Green Spaces.

2.5 However, the subject site was not recognised as particularly important to the local community at this time nor was it deemed appropriate by the Council to include it as a LGS designation. When endorsing the Neighbourhood Plan, the Inspector did not deem it necessary for the site to be allocated for this purpose.

2.6 It is submitted that, if the subject was not identified through the, relatively recent Neighbourhood Plan process – and that there has no change to its condition, use or circumstances since then, then it would not be appropriate to include it in the Local Plan policy document at the present time.

### b) Robust and Up to Date Assessment

- 2.7 The Council have prepared a Local Green Space Assessment and submitted this as evidence to support the Local Plan – Part 2. The Assessment of all potential LGS options is set out in Appendix A.
- 2.8 In respect of the subject site, the assessment relies on a simple yes/no criteria – noting that, as the site is used for food production, it is therefore ‘demonstrably special’. This level of assessment and conclusion is far from robust; being used for food production could apply to any number of open space or garden locations and is considered to be a particularly vague commentary.
- 2.9 The Assessment undertaken by the Council in respect of the subject site also relies on the fact that ‘other allotment sites’ have been afforded LGS status and that ‘other Neighbourhood Plans’ have adopted this approach. It is not sufficient in our view to rely on precedents elsewhere – particularly when the requirement of NPPF is to determine local value and to demonstrate local community significance.
- 2.10 The very fact that the subject site has not been already designated through the adopted Neighbourhood Plan process (as discussed above) provides further confirmation that less than significant value is, and should be, attributed to it in the current Local Plan.
- 2.11 As the assessment of this site has been superficial and vague – and that its findings do not align with the existing Moulton Neighbourhood Plan, we can conclude that it cannot be relied upon.

#### c) Demonstrably Special

- 2.12 To be ‘demonstrably special’, NPPF confirms that land should be locally significant in terms of its:
- Beauty;
  - Historic significance;
  - Tranquillity;
  - Wildlife; or
  - Recreational Value
- 2.13 In relation to the first four of these, there is no question that these apply. The site has no particular heritage significance, nor is it recognised for its beauty, tranquillity or wildlife quality.
- 2.14 We understand (through reference to the Council’s LGS Assessment) that the proposed designation is actually being brought forward on the basis of its value for food production. This rationale does not meet any of the above criteria.
- 2.15 Notwithstanding this, we accept that the site does have some recreational value at present given its extant allotment use. However, this value is not specific to the site itself but to the activities which are currently undertaken there, such activities as could potentially be re-provided in an alternative location. Nor is the site itself demonstrably special relative to any other allotments, or to any other area of open space in or around Moulton.

- 2.16 As an allotment, the site is already subject to policies which afford it protection from development. This is confirmed through reference to the Glossary (Appendix B) of the draft Part 2 Local Plan which states that allotments are 'green infrastructure' and that under Policy ENV4 the Council 'will protect, enhance and restore the District's green infrastructure assets'. Furthermore, Policy CW1 (ii) – 'Health and Wellbeing' confirms that the protection, management and enhancement of green infrastructure will be supported.
- 2.17 Any development of an allotment site would undoubtedly require the facility to be suitably re-provided for the local community; and given Moulton College's extensive landholding, there may be a number of suitable locations where re-provision could occur.
- 2.18 As such, this site's specific use as an allotment is not demonstrably special. It is therefore felt that no additional local benefit would be gained through the allocation of this site as a Local Green Space. In this context, we can see no justification for imposing a further layer of protection on this site.

### **Conclusion**

- 2.19 On the basis that the site has not been identified as local green space through the extant Neighbourhood Plan, that the methodology adopted by the Council to justify its designation is not robust nor has it adequately demonstrated its particular significance against the requisite criteria of the NPPF, we submit that the proposed Local Green Space allocation should be deleted.

### 3. Question 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?**

- 3.1 As set out in our response to Question 7, NPPF defines a specific set of criteria which a site must meet in order to be designated as Local Green Space. We accept that the site is relatively small in scale and is also located close to the community it currently serves – such that criteria 1 and 3 are met.
- 3.2 However, in respect of criteria 2 it must be shown that the site is ‘demonstrably special’ to the local community.
- 3.3 Our response to question 7 above discusses this point and provide evidence that the site does not meet this criteria – its current allotment use does not in itself make it unique or special and it is afforded protection under other planning policies. This discussion also highlights that the Council’s consideration of its function for food production falls outside the criteria altogether.
- 3.4 Furthermore, paragraph 76 of the NPPF states that, ‘*designating land as a Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services*’.
- 3.5 As set out within previous representations the subject site *could* offer potential to contribute to housing supply within the Northampton Related Development Area (NRDA), and provide an opportunity to meet the housing shortfall of the adjoining Northampton Borough – reflecting the fact that Moulton is a sustainable settlement, which is capable of accommodating additional housing and that is a suitable and logical location for additional housing.
- 3.6 Whilst accepting that the suitability of this site for alternative development is not for debate as part of the current Matter 8 discussions, it is nonetheless therefore, felt that a Local Green Space allocation would add an unnecessary and unjustified tier of protection, which would not be in accordance with paragraph 76 of the NPPF, in so far as it would not be consistent with the extant Neighbourhood Plan as well as the aims of plan making as identified within the National Planning Practice Guidance (NPPG).

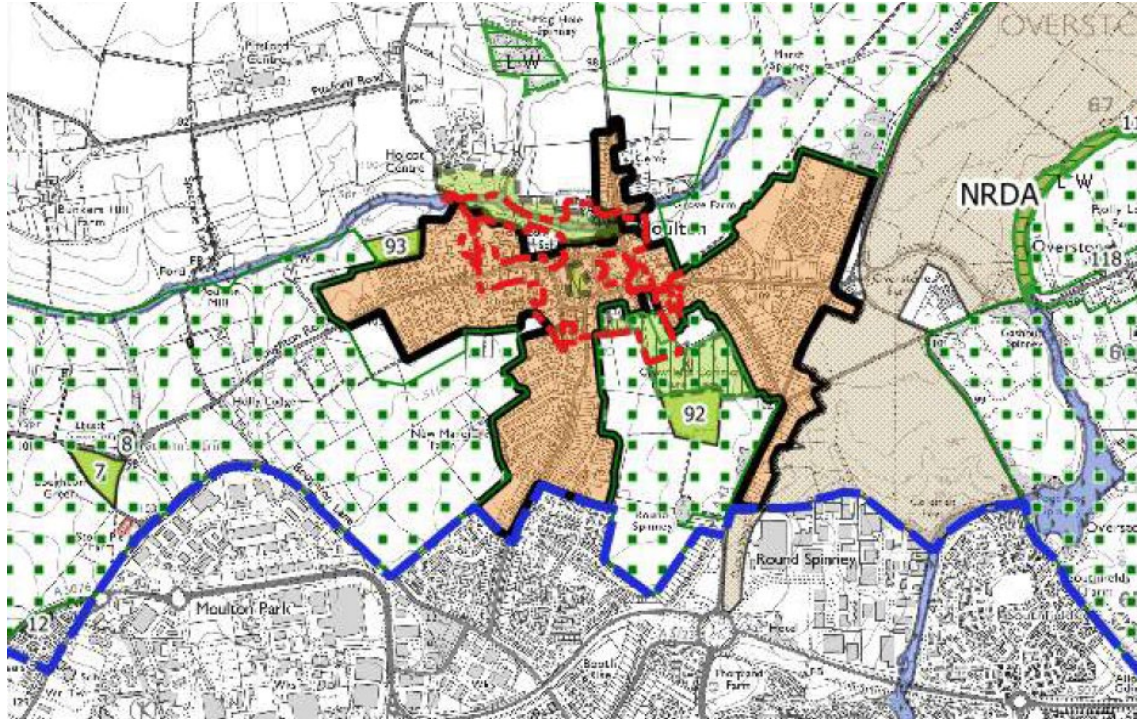
#### **Conclusion**

- 3.7 In conclusion, the proposed Local Green Space allocation is not consistent with the criteria for a Local Green Space designation and, as such the proposed allocation for this purpose should be deleted.

# **Appendix 1: Moulton College – Land Ownership Plan**



## Appendix 2: Proposed LGS 'Site 93' - Moulton Allotments





**Turley Office**  
Birmingham

T 0121 233 0902

**Turley**