

**CHELVESTON-CUM-CALDECOTT
NEIGHBOURHOOD DEVELOPMENT**

PLAN 2016-2031

**OBJECTION TO POLICY LGS19
& FAILURE TO INCLUDE A SETTLEMENT
BOUNDARY AT CALDECOTT ROAD
ON BEHALF OF Mr P MOMMERSTEEG**

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CONTENTS	Page
1. INTRODUCTION	1
2. EVOLUTION OF THE LGS DESIGNATIONS IN THE NP	3
3. THE HOUSING POLICIES IN THE NP	9
4. NATIONAL AND LOCAL GUIDANCE RE LGS DESIGNATIONS	11
5. THE OBJECTION IN RESPECT OF LGS19	16
6. THE OBJECTION IN RESPECT OF THE SETTLEMENT BOUNDARY WEST OF CALDECOTT ROAD	20
 APPENDICES	
APPENDIX 1 – SUBMISSION TO PARISH COUNCIL 8 FEBRUARY 2015 AND SUPPORTING DOCUMENTS	1 – 7
APPENDIX 2 – POLICY H1b IN VERSION 1 OF THE NP	8
APPENDIX 3 – OBJECTIONS TO LGS8 and 9 IN VERSION 1 OF THE NP	9 – 23
APPENDIX 4 – POLICY H1b IN VERSION 2 OF THE NP	24
APPENDIX 5 – OPEN SPACE SOCIETY INFORMATION SHEET C20	25 – 27
APPENDIX 6 – EXTRACTS FROM THE EAST NORTHAMPTONSHIRE DISTRICT LOCAL PLAN	28 – 33
APPENDIX 7 – EXTRACT FROM THE BACKWELL NEIGHBOURHOOD PLAN EXAMINER'S REPORT	34 – 36

*Objection to policy LGS19**Chelveston-cum-Caldecott Neighbourhood Plan*

1. INTRODUCTION

- 1.1 Chelveston-cum-Caldecott Parish Council are preparing a Neighbourhood Plan (NP) for the Parish and the 'submission' version was submitted to East Northamptonshire Council on 16 March 2016 prior to formal examination. These objections are submitted under Regulation 16 of the Neighbourhood and Planning (General) Regulations 2012.
- 1.2 These objections are made on behalf of Mr P Mommersteeg of Church House, Caldecott, NN9 6AT, and seek :
- a) the deletion of land to the west of Church House, Caldecott as Local Green Space (LGS19); and
 - b) the inclusion of the buildings, and their curtilages, situated on the western side of Caldecott Lane north of Bidwell Lane within a settlement boundary.

The objections relate to land shown edged blue (objection a) and red (objection b) overleaf.

- 1.3 Mr Mommersteeg has been a resident of the parish for many years and he welcomes the preparation of the Neighbourhood Plan which will guide development across the parish to 2031. He has commented on earlier versions of the NP and these submissions are referred to later. Objections are raised to the submission version of the NP regarding the designation of the land within his ownership to the west of Church House as Local Green Space (LGS) under LGS19 and also to the absence of a settlement boundary for the existing development situated on the western side of Caldecott Lane.
- 1.4 Insofar as the LGS19 designation is concerned, this land should not be designated as LGS because it is not of particular importance to the local community, does not require special protection, and does not meet the criteria set out in the Framework for designation as LGS. Furthermore the designation of this land is arbitrary and irrational.
- 1.5 Two parts of the existing settlement at Caldecott are defined by settlement boundaries in the emerging Neighbourhood Plan and figure 5.3 at page 33 refers. The Duchy Farm Barns redevelopment is included within a settlement boundary together with a pair of semi-detached houses to the west and a 20th century farm building and

*Objection to policy LGS19**Chelveston-cum-Caldecott Neighbourhood Plan*

agricultural land on either side to the north. Manor Farm and Poplar Farm comprise extensive ranges of buildings but are not included in the settlement boundary, nor is the development on the western side of Caldecott Road including Church House and the buildings to the north. Whilst there may be an argument not to include farmsteads within settlement boundaries there is no justification for excluding the development on the western side of Caldecott Road. In view of the extent of development on the western side of Caldecott Road this should be included within a settlement boundary.

- 1.5 These objections have been prepared following a walkover of the site and its surroundings, an assessment of the immediate and wider landscape context as viewed from both within the site, adjacent land, and public rights of way. Consideration has been given to policies in the North Northamptonshire Core Strategy (2009), the East Northamptonshire Local Plan 1996 as well as national and other guidance.
- 1.6 During the consultation on the second version of the NP an objection was made to the designation of Mr Mommersteeg's land as LGS19 but a compromise suggestion was also put forward, namely that the northern part of the land only be designated as LGS. A copy of the submission appears at pages 1 to 4 of the Appendices. The suggested compromise involved designating only that land north of the red line on page 4 as LGS.
- 1.7 In the succeeding sections the evolution of the LGS designations in the Neighbourhood Plan is considered (section 2); the evolution of the housing/settlement boundaries is considered (section 3); national and local guidance relating to the designation of LGS and settlement boundaries is considered (section 4); the detailed objections to the LGS designation are set out (section 5); and the objection in respect of the absence of a settlement boundary to the west of Caldecott Road is dealt with at section 6.

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

2. EVOLUTION OF THE LGS DESIGNATIONS IN THE NEIGHBOURHOOD PLAN

2.1 The Submission Version of the NP is the fourth version of the plan. Version 1 was published in August 2014; Version 2 in January 2015; Version 3 in January 2016 and Version 4 in March 2016.

2.2 At page 5 of the Appendices is figure 5.3 from Version 1 of the NP. It shows the LGSs in green which includes :

- LGS5, land to the west of the Old Vicarage and west of the western boundary of the churchyard;
- LGS8, an L shaped parcel of land located to the west and south of Church House and its garden;
- LGS9 the southern end of the paddock of which LGS8 forms a part together with the highway verge to the east and south of that land; and
- LGS11, land between Manor Farm and Popular Farm.

2.3 Pages 67 to 72 of Version 1 of the NP deals with the LGS designations and sets out the policy objective :

"To protect those Local Green Spaces of the parish which are most important to the street scene or have amenity value in the parish".

2.4 The objective simply refers to spaces which have "amenity value in the Parish". This does not accord with the advice in the Framework that such green areas have to be "demonstrably special to a local community". The Framework pre-dated Version 1 of the NP by over two years.

2.5 The overall policy justification for LGS policy is set out at page 67 of Version 1 of the plan which states :

"The NPPF (paragraph 73 to 77) provides for the designation of small tracts of land as Local Green Space to support the overall health and well-being of communities. The parish of Chelveston-cum-Caldecott has historically been poorly served by amenities with few opportunities for residents to enjoy an outdoor life within the parish. Parish Appraisals since 1994 have all identified the importance of circular walking routes for residents. However until 2008, only one route was realistically available and this was based mainly on roads or footways.

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

Parish Appraisals have also identified the need for a play area and a playing field in the parish, and more generally for facilities to engage and support young people. The decommissioning of the Chelveston Airfield transformed the outdoor life of the village by bringing a number of historical footpaths and bridleways back into use. An extensive rights of way network has now been created. This has encouraged many residents to walk regularly throughout the parish, and to explore further on foot into Stanwick Lakes, Irthlingborough Lakes, and into Bedfordshire. This in turn has promoted stronger connections and integration between residents in the three settlements as they meet on their walks. This has had a knock-on effect in other areas of community involvement, with residents meeting in the pub and through shared use of the allotments. In the consultation with residents, many comments related to the rural character of the village and the need to protect key views, routes and amenities. A designation of Local Green Spaces achieves this”.

- 2.6 Insofar as LGS5 (and also LGS6 and LGS7) are concerned, the justification for including these sites is set out at page 69 as follows :

“The paddock behind the Old Vicarage (LGS5 and LGS6) is subject to a restrictive covenant from the Church Commissioners which prevents residential development, given that the paddock is adjacent to the ancient churchyard (LGS7). The designation of the paddock as Local Green Spaces LGS5 and LGS6 strengthens the protection of this site and recognises its importance in situating the listed church building and churchyard in a rural landscape. This paddock is clearly visible when approaching the church from the road. The western end of the site (LGS5) is allocated for the future expansion of the churchyard if required (policy CEM)”.

- 2.7 The rationale behind the designation appears to be to prevent any development rather than for any ‘demonstrably special’ nature the land might have to the local community.

- 2.8 Turning to LGS8, the justification for this was stated to be:

“The paddock behind Church House is immediately adjacent to the churchyard facing the main church door. The paddock is crossed by a right of way historically used to access the church from Caldecott. Like LGS5 and LGS6, the paddock situates the church in a rural landscape.

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

The view, shown right, is taken from the churchyard towards the paddock”.

2.9 The justification for policy LGS9 was stated to be :

“The paddock on the corner of Bidwell Lane, opposite the listed Manor Farm, provides excellent views of the church from Bidwell Lane across the paddock LGS8, and provides a gradual transition from open countryside to the Duchy Farm settlement at the other end of Bidwell Lane. Parts of field behind and adjacent to Church House were originally proposed as ‘aspirational development sites’ during the consultation process. These proposals were rejected outright by Caldecott residents, and failed to achieve widespread support from the parish as a whole. The comments received during the consultation demonstrated the important visual amenity value of these fields. This has now been reflected in the designation of LGS8 and LGS9”

2.10 In fact due to the mature hedgerows along the eastern boundary of LGS9 the only views over this land towards the church are from the footpath which crosses the land.

2.11 The justification for policy LGS11 (between Manor Farm and Poplar Farm) was stated to be :

“The paddock behind the restored Old Smithy at Bidwell Lane Corner is an important green area separating the Poplar Farm and Manor Farm sites. This Green Space contributes strongly to the street scene as the most visible feature when driving down Caldecott Road, towards the Caldecott settlement. The site has been used for the grazing of horses for many years and is well suited to this use”.

2.12 Representations were made in September 2014 objecting in respect of the LGS 8 and 9 policies in Version 1 by Wilbraham Associates Ltd. The basis for those objections were set out in the submission and a copy appears at pages 6-20 of the Appendices.

2.13 The Basic Conditions Statement for Version 1 of the NP (published in August 2014) advises (at page 17) that LGS had been *“designated on open land which contributes to the retention of the existing form of settlements. Land surrounding the church has been designated to conserve the setting of the Grade II* listed building in LGS 5/6/7/8”.*

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

2.14 An extract from Version 2 of the NP appears at page 21 of the Appendices. Insofar as the changes to the LGS designations in this part of Caldecott are concerned, these comprised :

- a) *the deletion of LGS5;*
- b) *the deletion of LGS8 and 9 and their replacement with LGS19 which excluded the western most parts of LGS8 and LGS9 together with the highway verge to the east and south; and*
- c) *the deletion of LGS11.*

2.15 The policy objective for policy LGS in Version 2 was amended to include the words (in bold) below :

*"To protect those Local Green Spaces of the parish which are most important to the street scene, **the setting of listed buildings**, or have amenity value in the parish".*

2.17 Meeting notes indicate that the LGS5 designation was removed as a cemetery extension was not required during the plan period. LGS 11 was removed as this was too extensive a parcel of land to meet the requirements for inclusion.

2.18 The justification for the new designation LGS19 (replacing parts of LGS8 and 9 in Version 1) was stated to be :

"The paddock behind Church House is immediately adjacent to the churchyard facing the main church door. The paddock is crossed by a right of way historically used to access the church from Caldecott. Like LGS6, this paddock situates the church in a rural landscape with no modern dwellings or modern gardens visible from its precincts. The view shown top right is taken from the churchyard into the paddock in question towards Bidwell Lane.

The paddock extends down to Bidwell Lane, opposite the listed Manor Farm and provides excellent views of the church from Bidwell Lane. The view shown bottom left is taken of the church from Bidwell Lane. Part of the field adjacent to Church House were originally proposed as aspirational development sites during the consultation process. These proposals were rejected outright by 63% of Caldecott residents, and failed to achieve widespread support from the parish as a whole. The comments received during the consultation demonstrated the important

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

visual amenity value of this paddock, particularly as seen from Bidwell Lane.

Policy 2C of the Draft North Northamptonshire Strategy [Reference 45] states :

Proposals should protect and, where possible, enhance key views and vistas of heritage assets.....

Development in this paddock would certainly not protect or enhance the views of, or from, the church.

Policy 11 (2B) of the Draft North Northamptonshire Strategy states :

Neighbourhood Plans may identify sites within or adjoining villages to help meet locally identified needs or may designate sensitive areas where infill development will be resisted or subject to special control. Two other sites have been identified in Caldecott for an additional 7 dwellings to be developed over the next five years. These proposed sites enjoyed wide support within Caldecott and from the parish as a whole. Together with the four permissions recently granted, this represents a 55% increase in housing stock. There is no evidence of any need for additional housing in excess of this allocation.

There is however support for strengthening the protection of the paddock adjacent to the church to assure its long term rural setting. It is a sensitive setting and infill development will be resisted as provided for by Policy 11 (2B) of the Emerging North Northamptonshire Strategy. This has now been reflected in the designation of the paddock as LGS19 affording long term protection to these views of a 13th century church in a unique pastoral setting”.

- 2.19 The record of voting on the Call for Sites housing sites did not reveal widespread support for the other site allocations at Caldecott. This is dealt with at section 2 of the objection of September 2014. The Caldecott Road site received 46.8% support and conditional support whilst Bidwell Lane received 49.4% support. Also, with reference to these sites, there were few comments which related to ‘views of the Church from Bidwell Lane’.
- 2.20 The changes incorporated into Consultation Version 4.0 following consultation on Versions 1.0, 2.0 and 3.0 states at page 3 that :

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

“Policy LGS5 has been removed reflecting the removal of Policy CEM.

Policy LGS8/9 have been removed following representations from the landowner and changes to the field boundary configuration. Policy LGS19 has been added to provide protection for the views of the church from Bidwell Lane and the church door. The landowner has offered to provide a 25 m ‘visibility’ zone along Bidwell Lane to offer long term protection for views of the church. However, there is no formal mechanism in law for enacting this and indeed the LGS provisions in the Neighbourhood Planning regulations provide the only means for achieving this”.

- 2.21 The current submission Version of the NP retains the same LGS designations as in Version 2 of the NP.

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

3. THE HOUSING POLICIES IN THE NP

3.1 Paragraph 5.1 of Version 1 of the NDP deals with housing development policies and states :

“During the consultation process, residents raised a range of issues relating to housing development. The policies proposed in the plan take these into account. Key issues raised were :

- *Three separate settlements should be maintained and growth should be infill where possible rather than expanding the settlement boundaries;*
- *Development should be phased to allow new residents to be integrated effectively into the community;*
- *Provision should be made for smaller houses for younger people and for elderly residents wishing to downsize;*
- *Developments should not detract from the street scenes which define the form and character of the settlements in the parish;*
- *Developments should not make the problem of street parking worse.*

The policies and sub-policies shown in Table 5.1 deliver these objectives.

3.2 Table 5.1 then sets out six policies, policy H1 being restricted infill development within clearly defined settlement boundaries. Three settlement boundaries being identified, Chelston Rise (policy H1A); Caldecott (policy H1B) and Chelveston (policy H1C)”.

3.3 The policy justification for policy H1 states that :

“From the comments made during the consultation on aspirational development sites, it is clear that residents value the fact that Chelveston-cum-Caldecott comprises three distinct settlements. Each has a different history, character and lifestyle, but they are linked by shared amenities (the church, the pub and the village hall) and a common Parish Council. Residents were clear that the settlements should not merged and that their individual, distinct characters should be maintained as they develop. Distinct areas of separation will therefore be maintained between the settlements and other designated areas of the parish. The defined settlement boundaries reflect some of

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

the natural landscape features, and are an evolution of the boundaries used in all Local Plans since 1980”.

- 3.4 Although reference is made in the justification to the boundaries used in all Local Plans since 1980, the East Northamptonshire District Local Plan of 1996 (which covered the period to 2006) did not define settlement boundaries on the Proposals Maps.
- 3.5 The North Northamptonshire Core Strategy adopted in June 2008 set out the spatial strategy for North Northamptonshire but did not include any settlement boundaries for any of the settlements in North Northamptonshire.
- 3.6 Section 4 of the NP, Portrait of the Parish, states that : -
- “the Parish is a semi-rural setting with three distinct characters. Chelveston (altitude 61m) has 154 properties (January 2014 baseline) positioned at the low point of the surrounding landscape. Caldecott (altitude 71m) has 21 properties 0.5 km from Chelveston. Chelston Rise (altitude 88m) has 50 properties 1.0 km from Caldecott. The highest point in the Parish is the plateau on which an old airfield, RAF Chelveston, was situated at an altitude of 90m. This area is now partially occupied by a series of renewable energy installations”.*
- 3.7 Settlement boundaries have been defined in the NP for Chelveston, Chelston Rise and two parts of Caldecott, one at the western end of Bidwell Lane and the other south-east of Poplar Farm. The existing development west of Caldecott Road centred on the Old Vicarage and the church has been excluded but no explanation is given in the NP for this. The area is as large as, or larger than, the other two areas of Caldecott which are included within settlement boundaries.

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

4. NATIONAL AND LOCAL GUIDANCE RE LGS DESIGNATIONS

- 4.1 The Framework advises that local communities, through Local and Neighbourhood Plans, should be able to identify for special protection green areas of particular importance to them. By designating land as LGS local communities will be able to rule out new development other than in very special circumstances. Identifying land as LGS should therefore be consistent with the local planning of sustainable development and compliment investment in sufficient homes, jobs and other essential services. LGS should only be designated when a plan is prepared or reviewed and be capable of enduring beyond the end of the plan period (paragraph 76).
- 4.2 The Framework goes on to advise (at paragraph 77) that LGS designation will not be appropriate for most green areas or open space. The designation should only be used :
- *where the green space is in reasonably close proximity to the community it serves;*
 - *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
 - *where the green area concerned is local in character and is not an extensive tract of land.*
- 4.3 The Framework is supported by Planning Practice Guidance and ID: 37-013-20140306 asks "*What types of green area can be identified as local green space?*" It advises that the green area will need to meet the criteria set out in paragraph 77 of the Framework and whether to designate land is a matter for local discretion. For example green areas could include land where sports pavilions, boating lakes or structures such as War Memorials are located, allotments, or urban spaces that provide a tranquil oasis.
- 4.4 The Open Spaces Society have published guidance on LGS designations and their information sheet no. C20 refers. A copy appears at pages 22 to 24 of the Appendices. The information sheet refers to guidance in the Framework and then provides guidance in terms of the LGS criteria contained in the bullet points at paragraph 77

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

(and stated above). Insofar as the second and third of these bullet points are concerned, it states :

2. Demonstrably special to a local community.

Evidence must be provided of the land's value to and use by the local community to show the land holds a particular local significance. The land must fulfil one or more of the following criteria :

- a) *Beauty. This relates to the visual attractiveness of the site, and its contribution to landscape, character and/or setting of the settlement. LGS would need to contribute to local identity, character of the area and a sense of place, and make an important contribution to the physical form and layout of the settlement. It may link up with other open spaces and allow views through or beyond the settlement which are valued locally.*
- b) *Historic Significance. The land should provide a setting for, and allow views of, heritage assets or other local valued landmarks. It may be necessary to search historic records from the County Archaeologist or National or Local Records Office.*
- c) *Recreational Value. It must have local significance for recreation, perhaps through the variety of activities it supports, and be of value to the community.*
- d) *Tranquillity. Some authorities have an existing 'tranquillity map' showing areas that provide an oasis of calm and space for quiet reflection.*
- e) *Richness of Wildlife. This might include the value of its habitat, and priority areas may have been identified by the Council. It may require some objective evidence, such as a designation, like a wildlife site or local nature reserve.*

3. Local in character, not an extensive tract of land.

The criteria may differ between settlements depending on their physical size and population. The areas would normally be fairly self-contained with clearly defined edges. Blanket designation of open countryside adjacent to settlements will not be appropriate. There is no minimum size limit for LGS.

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

4. Land already designated.

If land is already protected by Green Belt policy or, in London, policy on Metropolitan Open Land, consideration should be given to whether any additional benefit would be gained. This may be in a case where LGS designation could help to identify areas that are of particular importance to the local community.

- 4.5 In the East Northamptonshire District Local Plan of 1996 policy EN20 dealt with important open land within towns and villages. It remains a 'saved' policy and states :

"Planning permission will not be granted for development which adversely affects open land of particular significance to the form and character of a town or village, as identified by one or more of the following criteria :

- 1) The land contributes to the retention of the existing form and character of a particular settlement;*
- 2) The land provides an important open area within a settlement which separates distinct groups of buildings or parts of the settlement;*
- 3) The land contributes to the setting of a listed building, a building of townscape quality, Ancient Monument or landscape feature, or contributes to the character of a Conservation Area;*
- 4) The land allows views into the settlement from approach roads or open countryside, views into the countryside from within the settlement, and/or views across different parts of the settlement.*

- 4.6 Paragraph 3.73 of the plan states :

"The Proposals Map illustrates the sites which are considered to be important open land and to which the above policy will apply".

- 4.7 Insofar as Caldecott and Chelveston are concerned, the only land subject to policy EN20 comprised a small piece of land to the east of Poplar Farmhouse at Caldecott and a triangular parcel of land located on the north-western side of the junction of Water Lane and High Street

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

at Chelveston. Extracts of the plan appear at pages 25-30 of the Appendices.

- 4.7 Consideration has been given to Examiner's reports following the examination of other NPs. In respect of the Backwell NP (near Bristol) the plan sought to identify two areas of LGS, Farleigh Fields and Moor Lane Fields. Objections were raised to the designation of this land as LGS and an extract from the Examiner's report appears at pages 31-33 of the Appendices.
- 4.8 The Examiner made a number of conclusions which apply equally to other areas proposed as LGS as follows :

"LGS is a restrictive and significant policy designation. The Framework requires the managing of development within LGS to be consistent with policy for Green Belts. Effectively, LGSs once designated, provide protection that is comparable to that for Green Belt land.

The Framework is explicit in stating that the LGS designation will not be appropriate for most Green Areas for open space. (para. 77).

Taking all of the above into account, it is essential that, when allocating LGS, plan makers can clearly demonstrate that the requirements for its allocation are met in full. These requirements are that the Green Space is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance; and it is local in character and is not an extensive tract of land".

- 4.9 He then went on to consider the extent of the two parcels of land proposed as LGS which extended to 19 and 32 ha respectively. He concluded that both of these were extensive tracts of land and therefore did not accord with the advice re LGS in the Framework.

- 4.10 He then continued :

"Given that the Framework is not ambiguous in stating that a LGS designation is not appropriate for most green areas or open space, it is entirely reasonable to expect compelling evidence to demonstrate that any such allocation meets national policy requirements. Specific to demonstrating that Farleigh Fields and Moor Lane Fields are not

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

extensive tracts of land, no substantive or compelling evidence has been presented.

A wide variety of arguments were put forward, both in favour of and in objection to the LGS allocation. Whilst I acknowledge these, I find that the direct conflict with national policy, above, means that the LGS policy does not meet the basic condition. Furthermore in this regard, I am mindful that nowhere does national policy suggest that a failure to meet policy requirements should be balanced against other considerations when designating LGS. Plainly the fact that there may be other benefits arising from a LGS designation does not mitigate against, or overcome a failure to meet, a policy requirement.

Notwithstanding the above and my decision below, I do recognise that an enormous amount of work has gone into considering Farleigh Fields and Moor Lane Fields. It is clear from the evidence provided that both areas include attractive, sensitive and well loved areas of land and there is no doubt in my mind that there are parts of both areas that have been demonstrated to be special to a local community, for a variety of reasons. In seeking to designate LGS, the NP was responding to local support – evidenced through a robust consultation process – for the protection of Green Areas and open space, regarded as special. Whilst individually, or together, these factors do not overcome the failure to meet a specific policy requirement, they are nevertheless important local considerations that have emerged through the NP process.

My recommendation below does not mean that the areas for which LGS designations were sought will automatically become available for development. National and local planning policy protects the countryside from inappropriate development. As pointed out by North Somerset Council, this Examination only considers the merits of Farleigh Fields and Moor Lane Fields as LGSs – not as potential housing sites”.

He then recommended the deletion of these two LGSs.

*Objection to policy LGS19**Chelveston-cum-Caldecott Neighbourhood Plan*

5. THE OBJECTION IN RESPECT OF LGS19

- 5.1 As the Examiner's report into the Backwell NP makes clear, LGS is a restrictive and significant policy designation. Effectively LGSs, once designated, provide protection that is comparable to that for Green Belt land. Accordingly it is entirely reasonable to expect compelling evidence to demonstrate that any such allocation meets national policy requirements (my emphasis).
- 5.2 Insofar as the evolution of the LGS policy in the Chelveston-cum-Caldecott NP is concerned, the designation of land north and south of the church was included in Version 1 following a 'Call for Sites' for future residential development in the village. Land to the south of Church House and on the north side of Bidwell Lane opposite Manor Farm was put forward as being suitable for residential development. These sites did not obtain a clear majority of full support in the subsequent voting within the Parish (46.8% of voters expressed support or conditional support with 48.9% against compared with the Bidwell Lane site which had 49.4% in support or conditional support and 46.3% against that development). As such the sites were not included for housing in Version 1 of the NP.
- 5.3 The subsequent designation of the land south of the church extending out to Bidwell Lane (as LGS8 and 9) was an attempt to prevent residential development on this land as proposed under the 'Call for Sites'. The designation of land to the north-west of the church under LGS5 was purely intended to support the allocation of that land as an extension to the cemetery as and when this was required.
- 5.4 In the Second Version of the NP the land to the south of the garden to Church House and forming the eastern extent of the earlier designations LGS8 and 9 was deleted, as was LGS5 and LGS11. The justification for inclusion of LGS8 and 9 is the same as the justification for inclusion of LGS19 in the current plan. This is despite the fact that a considerable part of that land has been removed from the designation.
- 5.5 At the various stages of consultation on the NP the local community has never been asked what areas of open land are considered to be of 'special value'. The LGS designations have been made by the working party and Parish Council without seeking the views of parishioners.

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

- 5.6 The only evidence provided with the submission NP to explain the basis for inclusion of land under LGS19 is that the paddock forms part of the rural setting of the church and that there are views towards the church door from Bidwell Lane (detailed at para 2.18 above). This is not sufficient to meet the test in the Framework that this is '*demonstrably special*' to the local community.
- 5.7 Given that the Examiner in the Backwell NP stated "*that it is entirely reasonable to expect compelling evidence to demonstrate that any such allocation meets national policy requirements*" the failure to provide such evidence is a significant and fundamental failing in this NP.
- 5.8 Insofar as the advice in the Framework is concerned, paragraph 77 sets out three bullet points which all proposed LGS designations need to comply with. I consider these below.
- *Where the Green Space is in reasonably close proximity to the community it serves.*

The community for the purposes of the NP comprises Chelveston and Caldecott including Chelston Rise. The LGS19 land is a minimum of 0.5 m from Chelveston (and on the opposite side of the busy B645 road) whilst Chelston Rise is 1 km away. Whilst the land is close to the three areas of residential development at Caldecott it is not in '*reasonably*' close proximity to Chelveston or Chelston Rise.

The Open Spaces Society Information Sheet no. C20 advises that some Councils have policies related to LGS and have introduced a maximum distance between the space and community. Leicester for example has stated it must be within 400 m, Central Bedfordshire within 600 m. Chelston Rise is outside both those distances, all of Chelveston is outside the 400 m distance and much of it is beyond the 600 m distance.

- 5.9 The second bullet point requires :
- *Where the Green Area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.*

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

Insofar as the 'beauty' of the site is concerned, the report prepared by My Iain Reid assesses the value of the site in landscape terms, both in a very localised context and also in a wider context. He concludes that the LGS19 land is no different in terms of its attractiveness to a number of other areas nearby which are not designated LGS.

Turning to historic significance, the NP suggests that the LGS19 land situates the church in a rural landscape with no modern dwellings or modern gardens visible from its precincts and that it provides excellent views of the church from Bidwell Lane. Views from Bidwell Lane are interrupted due to the trees on the northern side of the lane. A hedge which was reinstated along the southern edge of the field boundary in 2015 and as this matures views towards the church from Bidwell Lane will be significantly reduced. Hedge and tree planting has also taken place across the central part of the land last year and this will also, in due course, reduce any views from Bidwell Lane as the planting matures. The Examiner will observe these features at the site inspection.

If the purpose of the designation is to '*safeguard the setting of the church in a pastoral landscape*' then one would have expected the whole of the paddock to the west and south-west of the church, including the former LGS5 land, would have been included as part of the LGS designation. All of this land has a similar character to the land designated as LGS19 and there are a further two footpaths across the paddock to the west and south-west of the church. If views of the church from Bidwell Lane are important it is inconceivable that views from the two footpaths to the west and south-west of the church are not of equal significance particularly given that they are closer to the church than Bidwell Lane. The fact that this other land has not been included demonstrates that the LGS19 designation is to prevent development rather than because of its special value to the community.

The church is a Grade II* listed building and the Listed Buildings and Conservation Areas Act requires special attention to be given to the setting of listed buildings when considering any development proposals. As such there is already a mechanism in place to ensure that any proposed development would not adversely affect the setting of the church. Historic England would be a consultee due to the grading of the church. Accordingly we consider that not only is the designation inappropriate in terms of consideration under historic significance but it is unnecessary given the provision of the Buildings

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

and Conservation Areas Act. Furthermore the NP prevents development outside settlement boundaries. Even if our other objection to inclusion of the land west of Caldecott Road within the settlement boundary is upheld this would not allow residential development on any of the LGS19 land.

The LGS19 land has no value for recreational purposes. There is a public footpath which crosses the land but there is no public access to the remainder of the land. It has never been used for any community based events.

The LGS19 land is no more tranquil than much of the other land nearby and does not provide an oasis of calm in an otherwise bustling area.

The land has been used as a paddock for many years and is not of particular importance to wildlife. It is not designated as a Conservation Area, Local Wildlife Site etc.

- 5.10 Turning to the third bullet point at paragraph 77 of the Framework, this required the LGS to be local in character, not an extensive tract of land. The advice in the Open Spaces Information Sheet advises that this would normally be fairly self-contained with clearly defined edges.

The land designated as LGS19 forms part of a larger paddock extending to the east to Caldecott Road (south of the Church House garden) and to the west and south-west of the church. There is no fence, hedge or other boundary between the land designated as LGS19 and the western part of the paddock of which the site forms a part. The LGS19 area is not self-contained and does not have clearly defined edges on all sides.

- 5.11 LGS designations are required to endure beyond of the plan period. As the planting in the central part, and along the southern boundary, of the LGS 19 land matures there will be no views from the church of Bidwell Lane and vice versa. The designation does not therefore meet the requirement that such designations endure beyond the plan period.

- 5.12 For the above reasons the proposed designation does not accord with the advice in the Framework, the guidance in the Open Spaces Society Information Sheet C20, nor with the conclusions of the Examiner in respect of the Backwell NP.

Objection to policy LGS19

Chelveston-cum-Caldecott Neighbourhood Plan

- 5.13 The NP has to conform to strategic policies in the in local development plans. Under 'saved' Local Plan policy EN20 no part of LGS19 is designated as important open land which is of particular significance to the form and character of the village. As such it does not meet with the four criteria set out in policy EN20, namely :
- it does not contribute to the retention of the existing form and character of Caldecott;
 - does not provide an important open area within a settlement which separates distinct groups of buildings or parts of the settlement;
 - does not contribute to the setting of a listed building, a building of townscape quality, Ancient Monument or landscape feature, not does it contribute to the Character of the Conservation Area; and
 - the land does not allow views into the settlement from approach roads or open countryside, views into the countryside from within the settlement and/or views across different parts of the settlement.
- 5.14 As indicated above the deletion of the policy LGS19 designation will not automatically bring part or all of the land forward for development. Policy H1 precludes housing development on land outside or adjacent to the defined settlement boundaries. Once the NP has been made it will become part of the development plan and have full development plan status. The real intention behind the designation, to prevent any development of the land, will be provided for under policy H1 without the need to designate the land as LGS.
- 5.15 Notwithstanding the above objections Mr Mommersteeg would be prepared to accept the designation of the northern part of the land as LGS as a compromise. This is supported by Mr G Harwood the Parish Councillor in his email of 6 February 2016 to the Parish Council which appears at appendix 1 of the appendices.

*Objection to policy LGS19**Chelveston-cum-Caldecott Neighbourhood Plan*

6. THE OBJECTION IN RESPECT OF THE SETTLEMENT BOUNDARY WEST OF CALDECOTT ROAD

- 6.1 The development to the west of Caldecott Road is long standing and relatively extensive. It provides an urban character to this part of the street by virtue of the number and size of buildings as well as the extent of frontage development and is an important part of the character of the settlement of Caldecott.
- 6.2 All of the built up parts of the three settlements, save for the objection land, has been defined with a settlement boundary. No explanation has been given as to why this area has not been defined by a settlement boundary. It is illogical not to include it within a settlement boundary when it contains all the requisites for inclusion.
- 6.3 Simply because a settlement boundary is defined on a plan does not mean that unrestricted development can take place there. Any proposals would also be subject to the requirements of policy H4h. Drawing the boundary around the buildings and excluding long rear gardens (as has been done at Chelveston) would preclude backland development.

L Wilbraham

May 2016

**CHELVESTON-CUM-CALDECOTT
NEIGHBOURHOOD DEVELOPMENT PLAN 2016-2031**

**APPENDICES TO
OBJECTION TO POLICY LGS19
& FAILURE TO INCLUDE A SETTLEMENT
BOUNDARY AT CALDECOTT ROAD
ON BEHALF OF MR P MOMMERSTEEG**

LAURENCE WILBRAHAM Dip TP MRTPI

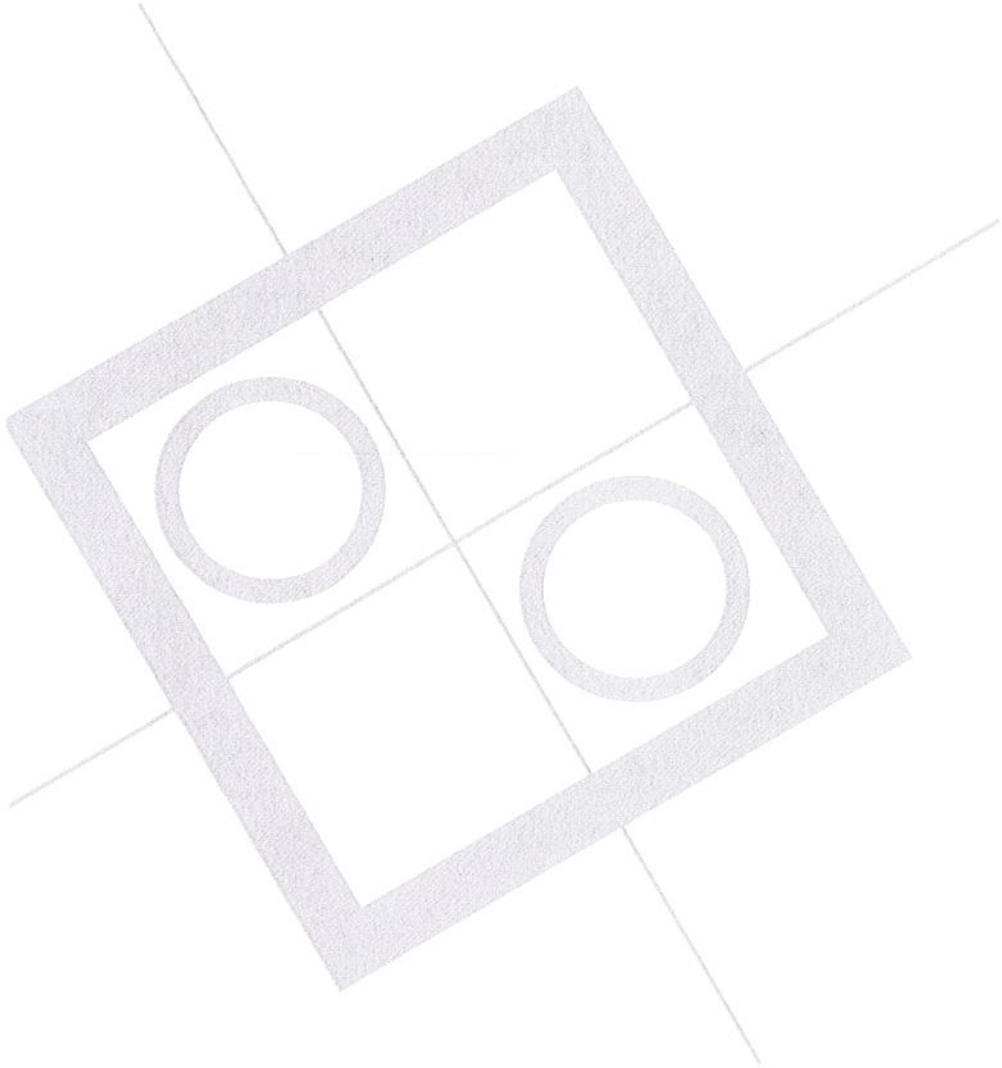
MAY 2016

LW/N5036P

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APPENDIX 1



Wilbraham Associates Limited

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on website



Ref Parish Council meeting 8th February

I am writing to you now because I am unable to attend this important meeting;

At that meeting, the final consultation document for the NDP is being submitted and with reference to that, I wish make a proposal which concerns **LGS19**. In brief, I propose the area covered in this designation is divided into two as shown in the diagram attached together with the rationale behind it.

I believe this 'compromise' proposal is both sensible and practical and provides a way forward which will satisfy both parties.


Pieter Mommersteeg

NDP-0242

Neighbourhood Development Plan LGS 19

The working party is proposing in the Plan that the whole area, LGS 19, as shown in the attached diagram, is designated Local Green Space. Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities.¹ The last consultation document (2.0) submitted states 'There is however support for strengthening the protection of the paddock adjacent to the Church to assure its long term setting. This has now been reflected in the designation of the paddock as **LGS 19** affording long term protection to these views of a 13th century Church in a unique pastoral setting'²

LGS proposed designation states a site should not be an 'extensive tract of land'. In my opinion LGS 19 is large, c1.6Ha, and extensive in respect to the overall conurbation of Caldecott/ Chelveston. It comprises an 80m stretch along Bidwell Lane and 190m between Bidwell Lane and the Church.

The proposed designation states the views are very special and by implication LGS 19 Bidwell lane is the only way of securing such views. There are however other sites which provide such opportunities. The most obvious are the 3 public footpaths readily available, well used and all leading directly to the Church. All the footpaths provide excellent uninterrupted views of the Church.

With this in mind I am proposing that LGS19 is divided into two parts. LGS19a which is that part of the field closest to the Church and would remain designated Green Space, LGS19a. This preserves the views and pastoral setting and protects it from any form of development. That part of LGS19 which covers the area from Bidwell lane to LGSa is essentially agricultural land and remains 'open countryside'. This would not be designated LGS.

¹ National Planning Guidelines

² NDP-Our-Plan/v2.0 p68

The proposed NDP is concerned about uncontrolled in-fill development using the LGS to re-enforce that. However there are in place strict national and local planning policies available to prevent such development and these will be re-enforced with an approved NDP. In my opinion, these policies are strong enough and the LGS designation is inappropriate. In effect, it prevents development in perpetuity and that is unjust to present and future owners.

I believe this proposal, a compromise, provides a sensible and practical way forward which I hope will satisfy both parties.

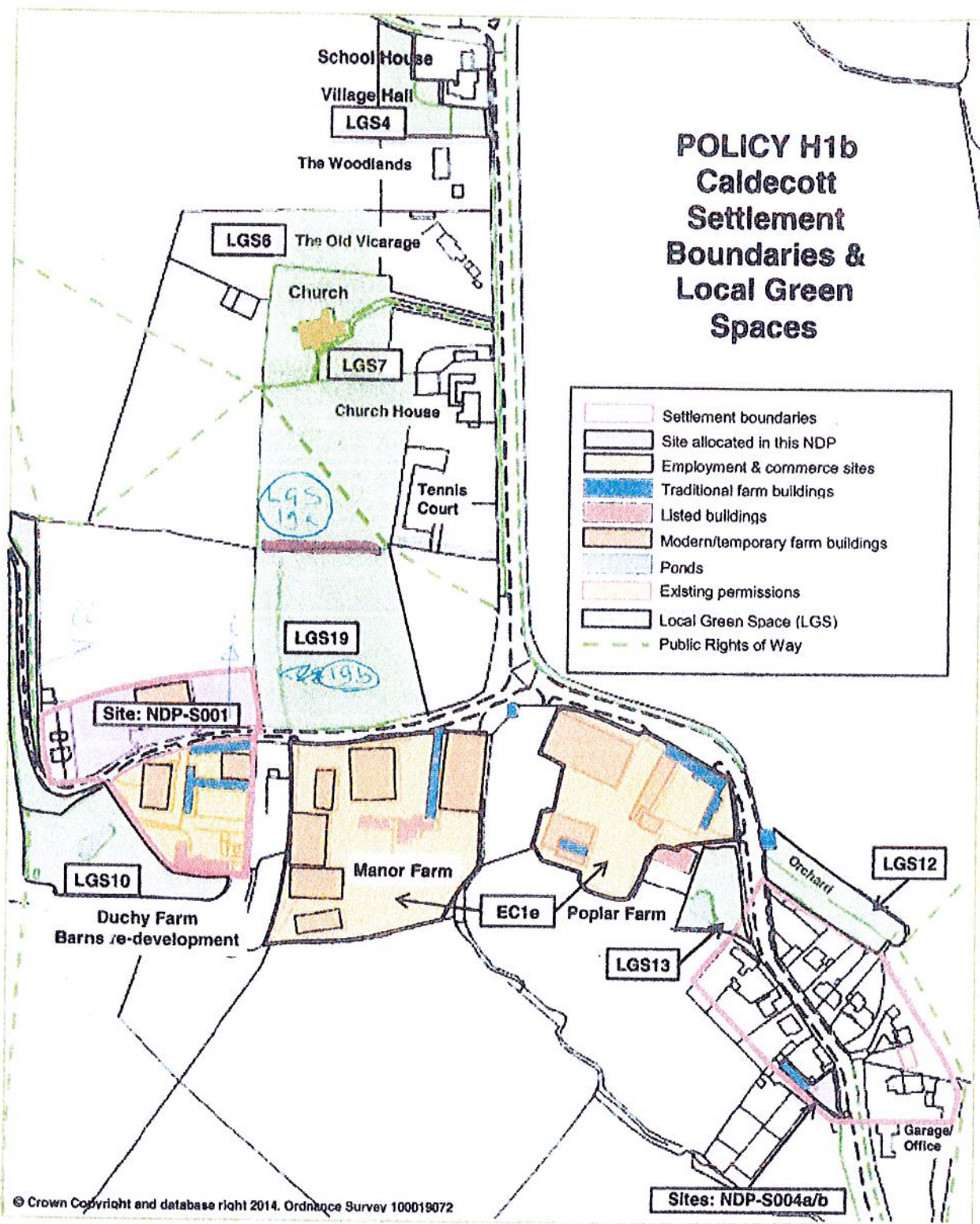


Figure 5.3 – Policy H1b – Caldecott Settlement Boundaries

The subsequent voting on the compromise proposal, PC meeting 8th February, was 3 for and 3 against and the Chair of the meeting then voted (a second time) against the proposal. Cllr Harwood was unable to attend and so could not vote.

Mommersteeg

From: Glenn Harwood [gharwood@east-northamptonshire.gov.uk]
Sent: 06 February 2016 14:21
To: Pieter Mommersteeg [REDACTED]
Subject: FW: PARISH COUCIL MEETING MON 08 FEB 2016 - AGENDA ITEM 12

Pieter,

For your info.....

Regards

Glenn

G Harwood

Cllr Glenn Harwood MBE
Deputy Leader East Northamptonshire Council
District Councillor Higham Ferrers Lancaster Ward

From: Glenn Harwood
Sent: 06 February 2016 14:19

CC: Clerk@chelveston.org.uk
Subject: PARISH COUCIL MEETING MON 08 FEB 2016 - AGENDA ITEM 12

Parish Councillors,

Unfortunately, I'm at a series of meetings at ENC this coming Monday which conflict with our Parish Council meeting, so I have sent my apologies to both Chair and Clerk.

You may recall that I had announced at the previous Parish Council meeting that I would speak on behalf of Pieter Mommersteeg, who cannot attend on Monday next, in respect of his objections to a section of the NDP, specifically, the recommendation for Local Green Space 19.

As I cannot now attend the meeting myself, but still wishing to support Pieter Mommersteeg's representations and objections on the matter, I sought the guidance of our Clerk on how I can achieve that. Our Clerk has advised me to make the following declaration to avoid any risk of pre-determination; ...'I state that, had I been able to attend the meeting, I would have spoken in support of the Landowners proposal at Agenda Item 12, subject to, of course, any new or compelling argument that might arise at the meeting'....

In essence; Parish Councillors are asked at Agenda Item 13 to review and agree whether or not the NDP should proceed to the next stage, i.e. Regulation 16 Consultation. Overall, I think the document is very good indeed, albeit still a draft document and so can be amended. That aside for a moment, I think those who have put so

11/02/2016

much time and effort into producing the NDP, which ultimately will shape the very future of our village, should be congratulated on their work, and their efforts recognised by way of a formally recording the thanks of the Parish Council.

However; within the NDP, there is one recommendation I have not agreed with from the start, specifically that which proposes Local Green Space (LGS) 19 which is found at page 33 of the NDP document. I have spoken on the matter before and in my role as the Landowner's District Councillor, have continued to advise the Landowner of procedure and process and in particular, how to object and make representation against this proposal.

I have always felt the amount of land involved in the NDP proposal for LGS 19 was rather large, and whilst I understood the issues about protecting the views and heritage of the Church, could not understand why LGS 19 ran all the way down to Bidwell Lane. The NPPF says (para 77) Local Green Space designation will not be appropriate for most green areas or open space – and currently, the LGS 19 area is already covered by the 'open countryside' designation in planning terms, so already has protection from unwelcome development.

Very recently, the Landowner, of his own accord, put forward an alternative proposal for LGS 19 which in my view, is a most sensible, pragmatic and satisfactory proposal effectively splitting in half the original amount of land proposed. The northern half would receive LGS status, the southern half not.

The benefits are that all the issues of protecting the views and vistas of the important heritage asset, the Church, are still achieved, whilst the longer term aspirations of the Landowner would still be possible in the future and beyond the life of the NDP; a compromise in the true sense and one that effectively and efficiently satisfies those issues both parties had concerns about.

In sum, I seek your support of the 'alternative proposal' on Monday evening next. I genuinely believe the offered 'compromise' is the most sensible way ahead and is one which might assist to prevent 'awkward' local situations arising.

I commend this alternative proposal to you.

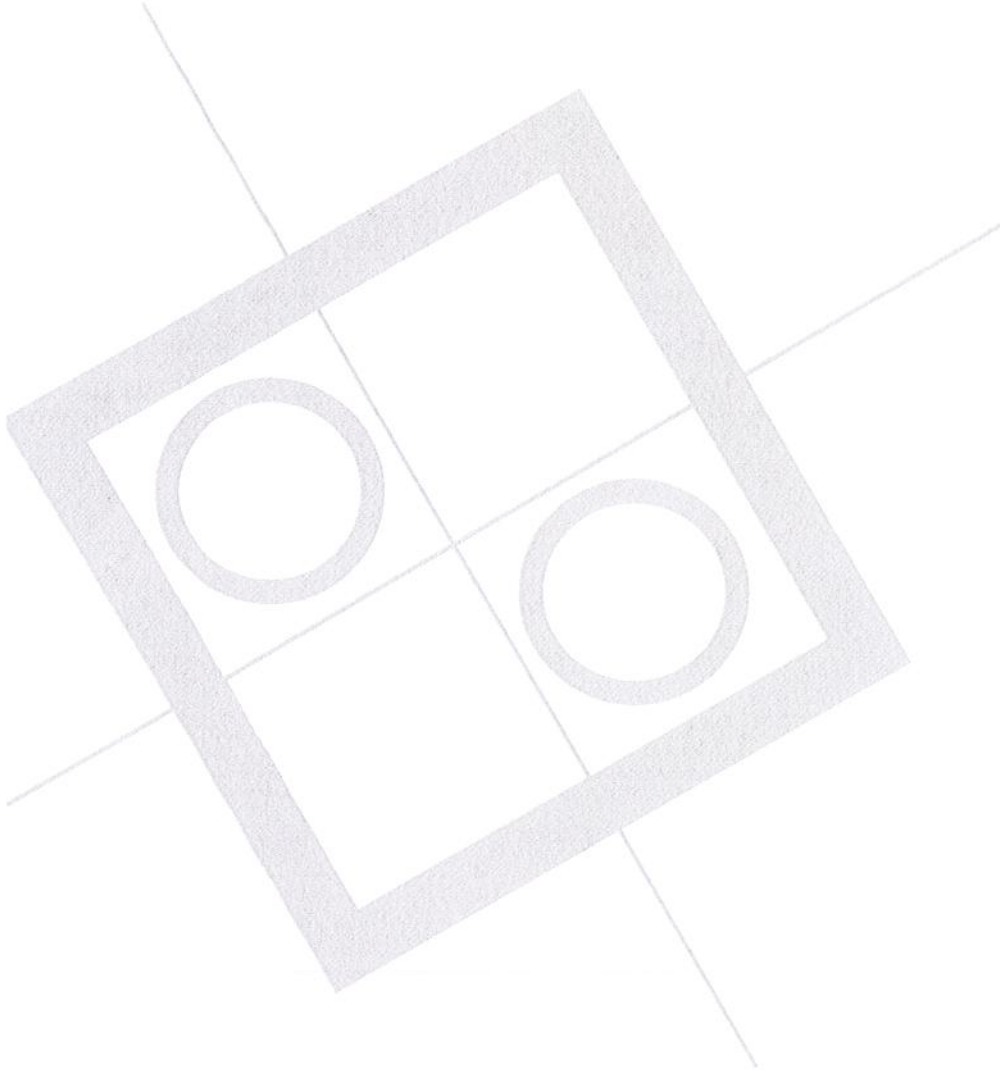
G Harwood

Cllr Glenn Harwood MBE

Deputy Leader East Northamptonshire Council

District Councillor Higham Ferrers Lancaster Ward

APPENDIX 2



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Neighbourhood Development Plan – Policies

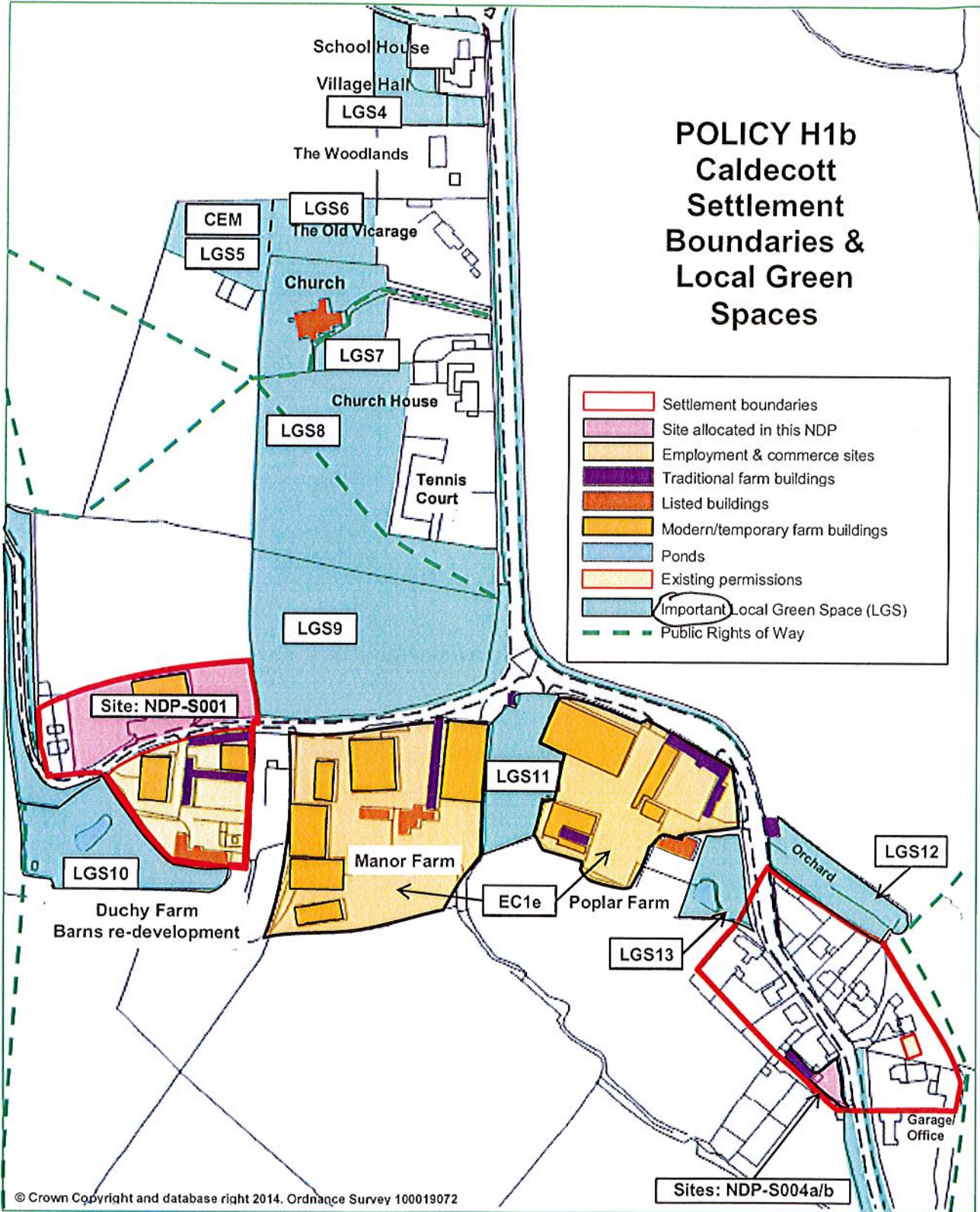
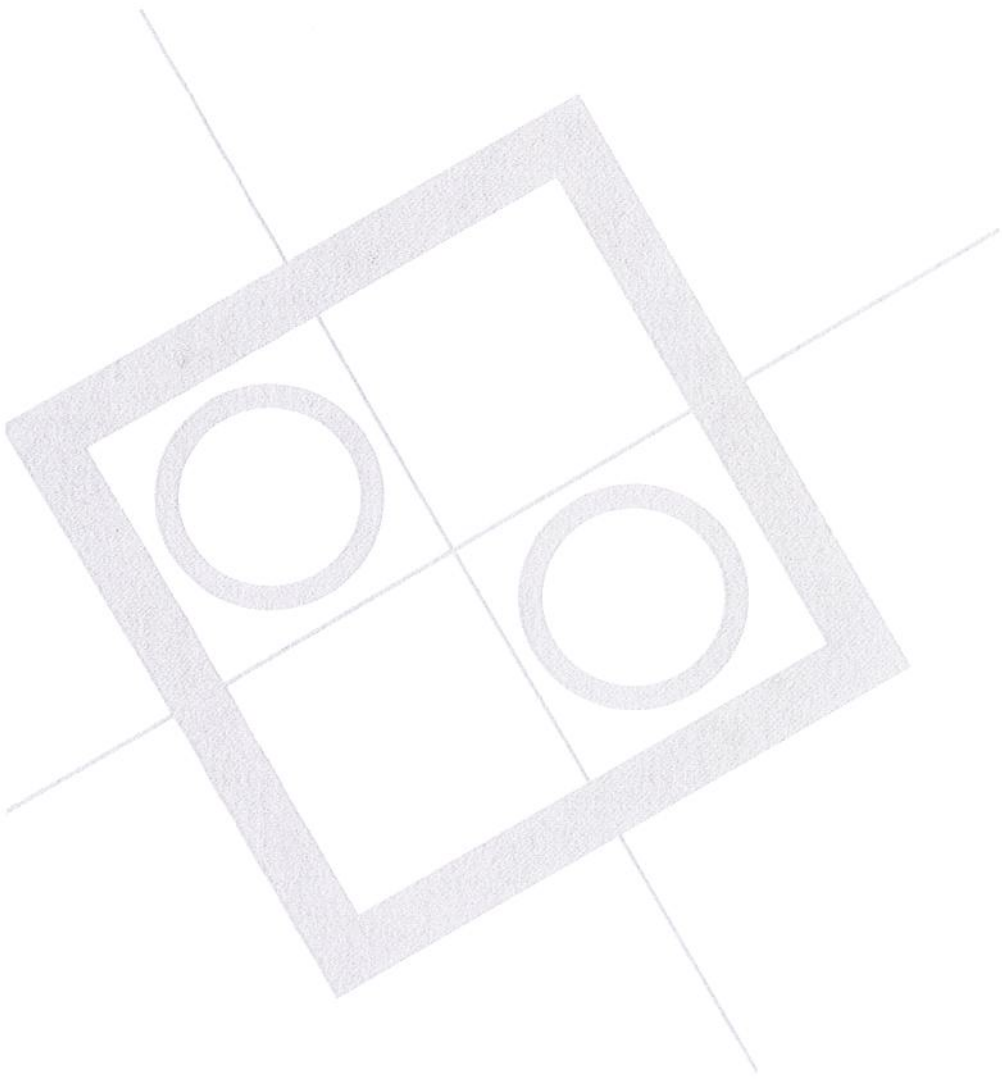


Figure 5.3 – Policy H1b – Caldecott Settlement Boundaries

APPENDIX 3



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**REPRESENTATIONS TO
CHELVESTON-CUM-CALDECOTT
NEIGHBOURHOOD PLAN 2015-2035
CONSULTATION VERSION 1.0
AUGUST 2014**

**SUBMITTED ON BEHALF OF
MR PIETER MOMMERSTEEG**

WILBRAHAM ASSOCIATES LTD

SEPTEMBER 2014

Wilbraham Associates Ltd
Chartered Town Planning Consultants

1. Introduction

- 1.1 Further to your recent consultation exercise on the above document, we set out below representations made on behalf of our client, Mr Pieter Mommersteeg.
- 1.2 In accordance with the Neighbourhood Planning (General) Regulations 2012, a Neighbourhood Development Plan must have due regard to national planning policy and must be in general conformity with strategic policies in the development for the local area. Relevant strategic planning policy is the North Northamptonshire Core Spatial Strategy (Adopted, June 2008) and the saved policies of the East Northamptonshire District Local Plan (Adopted, 1996).
- 1.3 In relation to that point, the National Planning Policy Framework (NPPF) (paragraph 184) states that:

“Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect those policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies”.

- 1.4 We are raising objection to the emerging Neighbourhood Development Plan (NDP) principally on the basis that it fails to comply adequately with national guidance.

2. Background

- 2.1 These representations are submitted on behalf of Mr Peter Mommersteeg, who owns land immediately behind Church House, adjacent to the Churchyard (**NDP Reference: LGS8**) and the paddock on the corner of Bidwell Lane opposite Manor Farm (**NDP Reference: LGS9**). The land owned by our client comprises undeveloped agricultural land (grazing) and extends to approximately 4 hectares. A right of way (Footpath MM11) extends across from Caldecott Road towards the northern boundary of the land.
- 2.2 Both parcels of land are identified in the NDP Consultation Version 1.0 as potential Local Green Space under **Policy LGS** and as shown on Figure 5.6 as:

LGS8 - land immediately behind Church House, adjacent to the Churchyard; and

LGS9 - the paddock on the corner of Bidwell Lane opposite Manor Farm.

We **object** to these potential designations.

- 2.3 We consider that both sites are not of particular importance to the local community requiring special protection and furthermore, do not meet the criteria outlined in the NPPF for designation as Local Green Space.
- 2.4 Both sites were promoted by our client through the Parish Council's 'Call for Aspirational Sites' consultation period which closed on 30 November 2013. The two parcels of land were identified by the Parish Council as Caldecott Road (NDP-S018a) and Bidwell Lane (NDP-S018b). The representations provided by our client highlighted the suitability of each site for residential development and how the attributes of each of the sites were suitable to accommodate small scale residential development.
- 2.5 Following from this consultation exercise, the Parish Council sought views from Parish households on the individual submissions made by landowners. The Parish Council's NDP Working Party analysed the results and discussed each promoted site to assess which of the proposals should go forward as 'preferred options' into the development plan. The full recommendation was discussed and approved by the Parish Council on 14 April 2014.
- 2.6 In regard to the outcome of the assessment of each of the sites, the Parish Council decision resolved the following:-

NDP- S018a – Caldecott Road

Parish Council Decision: On the basis that (a) the site NDP-S018a received insufficient popular support (b) this would be a development in open countryside contrary to Policy 1 of the CSS (c) development would

substantially change a sensitive approach to Caldecott and (d) the proposition would exceed the numbers of new properties that would be accepted in Caldecott during the period of the plan, this proposition is rejected for adoption.

NDP – S108b – Bidwell Lane

Parish Council Decision: On the basis that (a) the site NDP-S018b received insufficient popular support (b) this would be a development in open countryside contrary to Policy 1 of the CSS (c) development would substantially change a sensitive approach to Caldecott and (d) the proposition would exceed the numbers of new properties that would be accepted in Caldecott during the period of the plan, this proposition is rejected for adoption.

- 2.7 Finally, in regard to the assessment of each of the sites, we are concerned with how the Parish Council have interpreted the results of the poll on our client's land proposition and furthermore, how this is reflected in the emerging NDP.
- 2.8 The Parish Council published criteria for evaluating the results of the poll (Reference: NDP-0177). The document states that the Parish Council has developed a series of objective criteria against which each site can be evaluated for inclusion in the NPD. This is summarised as follows:
1. Propositions with a clear majority of Full Support (i.e. more than 50% of the voters supporting them) would go forward as preferred development sites into the NDP unless :

- a) External policy constraints mean that adoption of a particular site as a preferred option would be considered 'unsound' by an Inspector.
2. Propositions with a clear majority of Full Rejection (i.e. more than 50% of voters rejecting them) would be excluded from the Plan unless :
 - a) There are external policy constraints which would favour the development and make a non-sense of trying to reject it.
 3. Propositions which have more than 50% when combining the votes in Full Support and Conditional Support would be considered for adoption under the following circumstances:
 - a) Where external policy constraints mean that the rejection of a particular site as a preferred option would be considered 'unsound' by an Inspector.
 - b) And provided that the Land Owner is prepared to address enough of the modifications suggested in the comments made by voters, such that majority support could be achieved.

2.9 In regard to each of the sites, the following votes were recorded:-

(i) NDP- S018a – Caldecott Road

Vote	% of voters
Support	41.1%
Conditional Support	5.7%
Reject	48.9%
No Opinion	4.3%

(ii) NDP – S018b – Bidwell Lane

Vote	% of voters
Support	41.4%
Conditional Support	8.0%
Reject	46.3%
No Opinion	4.3%

2.10 As detailed above, whilst a clear majority of full support (ie more than 50% of voters support) was not achieved in each of sites put forward by our client, the votes in favour (both support and conditional support) were marginally close to 50% in particular the Bidwell Lane site achieving 49.4%. We consider that this matter is not at all reflected in the emerging NDP in particular in regard to the description of LGS9 (Bidwell Lane) as provided on page 70. Within the text, the NDP states the following:

“Parts of fields behind and adjacent to Church House were originally proposed as Aspirational Development Sites during the consultation

process. These proposals were rejected outright (our emphasis) by Caldecott residents, and failed to achieve widespread support from the Parish as a whole."

- 2.11 We consider that the above description provided within the emerging NDP is misleading and does not reflect the actual circumstances of the vote taken in regard to this site. We do not consider that a small proportion of votes, although coming from those closest to the proposed site, should heavily influence the future inspirations of the Parish as a whole.
- 2.12 Furthermore, we consider that the potential designation of the two sites owned by our client to 'Local Green Space' results from my client bringing the sites to the attention of the Parish through the 'call for aspirational sites'. Both sites are located outside the built up area of Caldecott which means that there are already existing strict controls on development in this location. We do not agree with the Parish Council's approach in designating these two pieces of land as 'Local Green Space and why an additional control is necessary as we set out in the next section of this representation.

3. Representations

- 3.1 The opportunity to designate Local Green Space is provided in Paragraph 76 of the NPPF which states:

"Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be

able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.”

3.2 We note the requirement that green areas to be designated as Local Green Space should be of ‘*particular importance*’ to the local community as described within Section 30 of the Planning Practice Guidance. The land within our client’s ownership is currently an area of undeveloped agricultural land which is and has been extensively used for the grazing of livestock. It is private land and whilst there is a public right of access extending through the site, the land as a whole is not available for public or community use. We consider that the emerging NDP does not make it clear how the land is particularly important to the local community.

3.3 Paragraph 77 of the NPPF identifies the criteria for designating Local Green Space and states:

“The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular significance, for example because of its

beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

- where the green area concerned is local in character and is not an exhaustive tract of land.”

3.4 It is clear from the guidance provided above that for a green area to be designated as a Local Green Space it needs to satisfy all the above criteria and not just one. We now assess each of the sites against each of the criteria below.

LGS8 - land immediately behind Church House, adjacent to the Churchyard;

3.5 Firstly, the site is currently located within the open countryside which means that there are already strict controls on development in this location. It is not clear why an additional control is necessary. Whilst the site is close to the properties along Caldecott Road, it is not within close proximity of the main settlement and other built up areas. The site is private land and we would conclude that the site does not comply with the first criteria for Local Green Space designation.

3.6 The emerging NDP provides no suggestion why this site should be designated as Local Green Space nor does it state how the site is “demonstrably special” to the local community or how it has a “particular local significance”. If the site is of the form and character of this part of the Parish, it would have been identified as such within the East Northamptonshire District Local Plan as ‘Important Open Land’. The site comprises a grass field which has been historically used for agricultural

purposes and therefore it cannot be of special significance to the community. Given the extent of the mature hedgerow along Caldecott Lane, that part of LGS8 and part of LGS9, some 40 m from the road, does not afford opportunities for views across this field or the Church. In our opinion, the site is part of a typical field surrounded by a hedge and post and rail fence enclosing a grassfield and not particularly notable for its beauty. We conclude that the site has no historic or significance for the Parish. Furthermore, the site has no recreational value and has never been used as a playing field.

- 3.7 The site is currently used for agricultural purposes which makes it highly unlikely that the site has any nature conservation interest. There are hedges at the site boundary which may provide habitat for some species. An assessment of the ecological interest of the site would need to be undertaken, although we are not aware that it has any interest worthy of protection. We note that the specific nature conservation related to criteria for designating a Local Green Space is that the site must contain a "richness of its wildlife". We would anticipate that if the site was "rich in wildlife" it would have been identified before now.
- 3.8 We therefore conclude that the site meets none of the criteria identified in the second bullet point of paragraph 77 of the NPPF.
- 3.9 The final criteria of Paragraph 77 of the NPPF relates to the size of the proposed Local Green Space which should be a relatively small rather than large area. Given the advice provided within the NPPF and further reinforced within the National Planning Practice Guidance (NPPG), we

refers to maintaining a '*rural aspect and function whilst preserving views of the 13th Century Grade II* listed church and the surroundings of the Grade II listed buildings at Manor Farm and Duchy Farm.*'. It is our view that the Parish Council's aspirations are to maintain views of the Church across the field and we therefore consider the designation of the site as 'Local Green Space' is not the appropriate manner in which to achieve this aspiration. We would go on to comment that the attraction of the view towards the listed Church from Bidwell Lane was made more apparent as result of my client clearing and maintaining the site boundary, in addition to the heavy pruning of a large chestnut tree situated in front of the south side of the church.

- 3.13 In our opinion, the site is a typical field surrounded by a hedge and post and rail fence enclosing a grass field which in itself is not particularly notable for its beauty. We conclude that the site has no historic or significance for the Parish. Furthermore, the site has no recreational value.
- 3.14 The site is currently used for agricultural purposes which make it highly unlikely that the site has any nature conservation interest. There are hedges at the site boundary which may provide habitat for some species. An assessment of the ecological interest of the site would need to be undertaken, although we are not aware that it has any interest worthy of protection. We note that the specific nature conservation relating to criteria required for designating a Local Green Space is that the site must contain a "richness of its wildlife". We would anticipate that if the site was "rich in wildlife" it would have been identified before now. It has not.

- 3.15 We therefore conclude that the site meets none of the criteria identified in the second bullet point of paragraph 77 of the NPPF.
- 3.16 The final criteria of paragraph 77 relates to the size of the proposed Local Green Space which should be a relatively small rather than large area. Given the advice provided within the NPPF and further reinforced within the National Planning Practice Guidance (NPPG), we consider that the site is relatively large and as such does not fulfil the definition of Local Green Space.
- 3.17 It is clear from the wording of the NPPF that Local Green Space designation is not intended for use on all open space but it is a tool to be used for particular special circumstances. This site does not meet the criteria for Local Green Space and therefore should be designated as such.
- 3.18 Turning to a separate matter, we wish to comment upon Policy H4f (Preserving the street scene around Caldecott Road) and in particular the description provided within the policy's justification. The policy and justification refer to the 'open rural approach to the Caldecott settlements'. The description provided relating to Caldecott Road as being 'open and rural', we consider is subjective. Existing dwellings comprise approximately 75% of the length of that part of Caldecott Road. The 'large open verge' near the Caldecott Road and Bidwell Lane junction resulted from the rerouting of the road. Beyond the Caldecott Road and Bidwell Lane junction there is a haulage and maintenance business which we consider does not contribute to the 'rural' approach. In summary, we

consider that the description provided within the policy justification does not reflect the character of this part of the Parish.

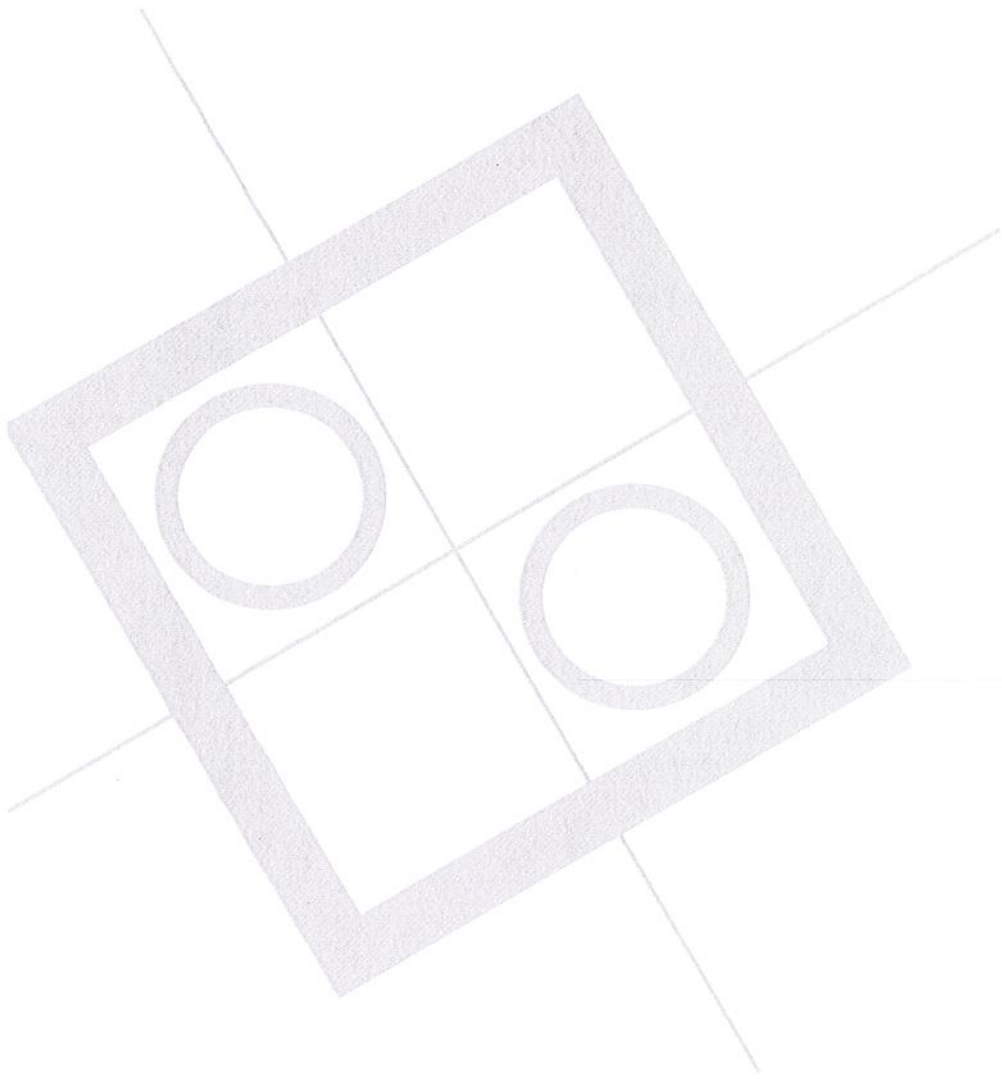
- 3.19 Finally, we would draw your attention to Figures 5.3 and 5.6 of the emerging NDP which refers to Policies H1b and CEM. The key provided with each of the Figures refers to 'Important Local Green Space' this should be amended to read as 'Local Green Space'.

4. Conclusions

- 4.1 Paragraph 182 of the NPPF explains that a sound plan must positively be prepared, be justified, affective and consistent with national policy. To be justified a DPD needs to be founded on a robust and credible evidence base. We consider that no evidence has been provided by the Parish Council to support the designation of the site as Local Green Space.
- 4.2 We object to the designation of these two sites as Local Green Space. The sites do not meet the criteria for Local Green Space as set out within paragraph 77 of the NPPF, it is private land; it is not noted for its beauty; it has no historic significance; it is not tranquil; it is not used for recreational purposes; and it is not rich in wildlife.

Wilbraham Associates Limited
September 2014

APPENDIX 4



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Neighbourhood Development Plan – Policies

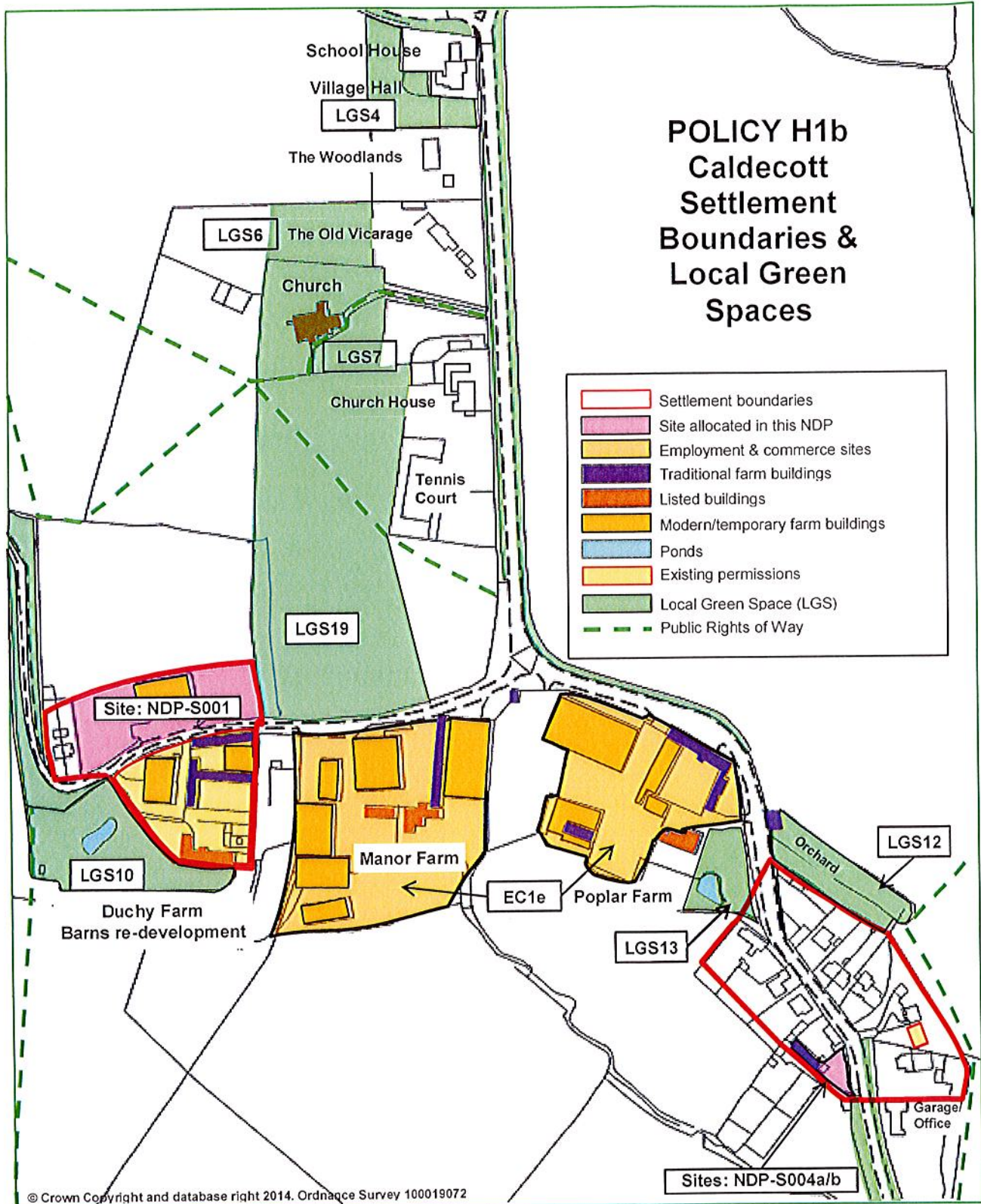
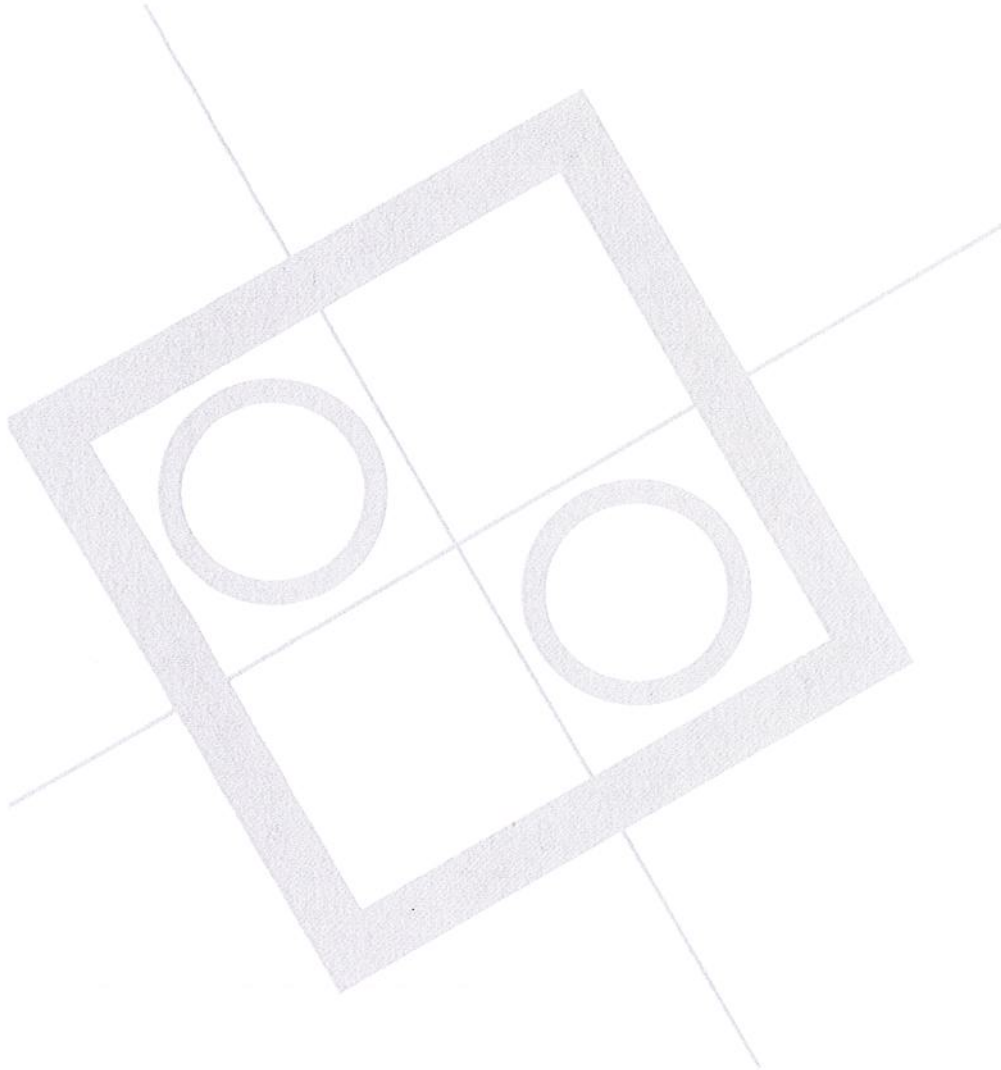


Figure 5.3 – Policy H1b – Caldecott Settlement Boundaries

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INFORMATION SHEET NO: C20

Local Green Space Designation

Local Green Space Designation

What is it?

The National Planning Framework (NPPF), published by the Department for Communities and Local Government in March 2012, sets out the government's planning policies for England. Paragraphs 76 to 78 introduce a new Local Green Space designation (LGS) to protect local green areas of particular importance to local communities. This will enable communities, in certain circumstances, to identify and protect areas that are of value to them through local and neighbourhood plans.

Once designated, the LGS is subject to the same strong development restrictions as Green Belt, and new development here is ruled out other than in special circumstances.

The LGS is designated by the planning authority (borough, district, metropolitan or other unitary authority). Local people need to lobby the authority to designate LGS, based on the criteria. We explain below what we know of the LGS: whether to designate land is a matter for local discretion.

Some areas may already be available for public access, other land could be considered for designation even if there is no public access. Designation does not confer any rights of access over what currently exists.

Local Green Space criteria

1. Reasonably close proximity to the community it serves

There is no definition of this in the NPPF and it will be up to individual planning authorities to define. This may vary depending on the size of the community to which the green space relates, the size of the green space or the value placed on it by the community. The land must not be isolated from the community and would normally be within easy walking distance of the community served. Some councils have policies relating to LGS and have introduced a maximum distance between the space and the community. For instance, Leicester has stated it must be within 400 metres, Central Bedfordshire 600 metres.

2. Demonstrably special to a local community

Evidence must be provided of the land's value to and use by the local community to show the land holds a particular local significance. The land must fulfil one or more of the following criteria:

- (a) **Beauty**
This relates to the visual attractiveness of the site, and its contribution to landscape, character and or setting of the settlement. LGS would need to contribute to local identity, character of the area and a sense of place, and make an important contribution to the physical form and layout of the settlement. It may link up with other open spaces and allow views through or beyond the settlement which are valued locally.
- (b) **Historic significance**
The land should provide a setting for, and allow views of, heritage assets or other locally-valued landmarks. It may be necessary to research historic records from the County Archaeologist or National or Local Records Office.
- (c) **Recreational value**
It must have local significance for recreation, perhaps through the variety of activities it supports, and be of value to the community.
- (d) **Tranquillity**
Some authorities have an existing 'tranquillity map' showing areas that provide an oasis of calm and a space for quiet reflection.
- (e) **Richness of wildlife**
This might include the value of its habitat, and priority areas may have been identified by the council. It may require some objective evidence, such as a designation, like a wildlife site or Local Nature Reserve.
3. **Local in character, not an extensive tract of land**
The criteria may differ between settlements depending on their physical size and population. The areas would normally be fairly self-contained with clearly-defined edges. Blanket designation of open countryside adjacent to settlements will not be appropriate. There is a no minimum size limit for LGS.
4. **Land already designated**
If land is already protected by Green Belt policy or, in London, policy on Metropolitan Open Land, consideration should be given to whether any additional local benefit would be gained. This may be in a case

where LGS designation could help to identify areas that are of particular importance to the local community.

Process

LGS can only be designated when the local plan is being reviewed or a neighbourhood plan is being produced. Designating any LGS will need to be consistent with local planning for sustainable development in the area. LGS will rarely be appropriate where land has planning permission for development. Exceptions can be made where the development will be compatible with the reasons for designation. However, even if neither of these processes is occurring in your area now, you should identify the areas you would like to see designated as LGS.

Check if your council has policies for the designation of LGS and frame your application accordingly. Collect the evidence for designation, and submit this to the council when the local plan is reviewed or neighbourhood plan is being produced. Lobby your councillor too.

Some planning authorities have identified a list of areas that they consider would be appropriate for LGS designation. This may be part of a consultation on Draft Site and Policies Plan, or Allocations Plan.

Examples of land designated as LGS include:

Aspley Guise, Central Bedfordshire
http://www.centralbedfordshire.gov.uk/Images/Local%20Green%20Space%20Paper%20with%20Cover%20V2_tcm6-37615.pdf
 and Queen's Crescent, Exeter, Devon
<http://www.exeter.gov.uk/CHttpHandler.ashx?id=180777&p=0>

Useful websites

Department for Communities and Local Government:

'Get the green space you want: how the government can help'

<http://tinyurl.com/p3417b>

<http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/>

Leicestershire County Council, Green Spaces in Leicester and Leicestershire: local green spaces toolkit:
<http://www.leics.gov.uk/greenspaces>

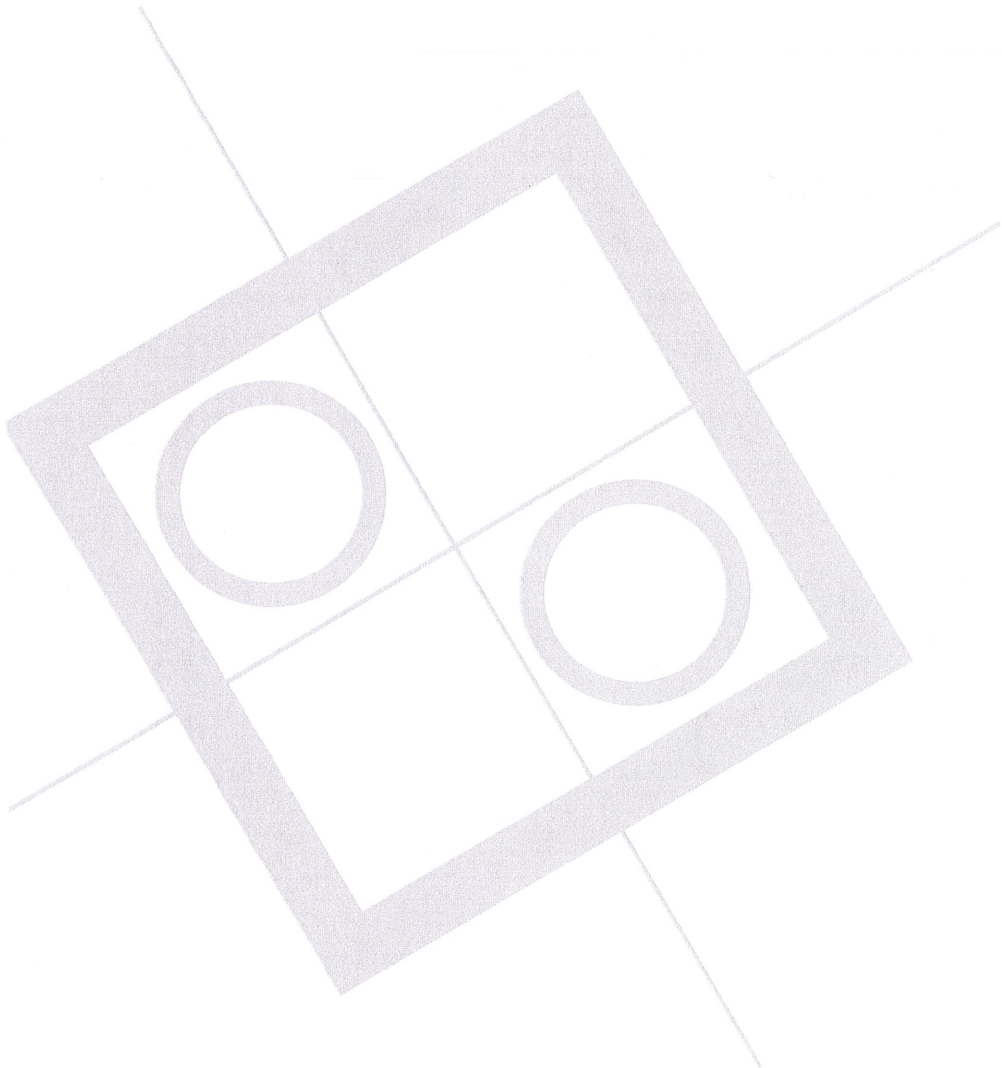
Extract from National Planning Policy Framework (DGLG 2012, paragraphs 76-78)

76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space, local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.
77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:
- Where the green space is in reasonably close proximity to the community it serves;
 - Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - Where the green area concerned is local in character and is not an extensive tract of land.
78. Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.

While the Open Spaces Society has made every effort to ensure the information obtained in this factsheet is an accurate summary of the subject as at the date of publication, it is unable to accept liability for any misinterpretation of the law or any other error or omission in the advice in this paper.

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- 3.66 To prevent the physical deterioration of historic buildings proposals for their restoration, conversion, or new use, will be considered sympathetically. Although the original use of a building is preferred it is sometimes not practicable or viable to achieve this. In these circumstances, a suitable alternative use which ensures the retention and future life of the building may be allowed. All proposals will be considered with regard to their impact on the historic and architectural features of the building.
- 3.67 *Action will be taken to protect unlisted buildings of architectural, historic or townscape importance which come under threat.* There may be instances where a building although not included on the statutory list, is of sufficient architectural, historic or townscape importance to merit protection and retention. The above policy will therefore apply to any buildings which are considered to be of special character and townscape value.
- 3.68 Where there are proposals to demolish, alter or extend unlisted buildings which are worthy of retention, the District Council will take formal action to secure their protection.

Financial Assistance and Environmental Enhancement Schemes

- 3.69 *Financial assistance will continue to be given towards existing Historic Town Schemes, the establishment and financing of further Town Schemes will be considered.* In recognition of the special quality of the Conservation Areas in Higham Ferrers and Oundle, Historic Town Schemes have been introduced. Through these schemes grants are available to the owners of specified buildings within the Conservation Area, for the cost of necessary repairs. The District Council, the County Council and The Historic Building and Monuments Commission for England (English Heritage), all contribute towards the schemes.
- 3.70 *Financial assistance will normally be offered for repairs necessary to maintain those historic buildings whose character renders them worthy of retention.* Buildings of architectural or historic interest may be eligible for financial assistance towards structural repairs or the reinstatement of historic details. Priority will generally be given, within available resources, to those schemes where the greatest benefits can be secured.
- 3.71 *The implementation of environmental improvement schemes will continue to be supported.* The District Council intends to promote area improvement schemes. These could relate to the enhancement of Conservation Areas and improvements to town centres and older housing areas. It is likely that large scale schemes will be implemented in association with other public and private organisations.

Important Open Land Within Towns and Villages

POLICY EN20

PLANNING PERMISSION WILL NOT BE GRANTED FOR DEVELOPMENT WHICH ADVERSELY AFFECTS OPEN LAND OF PARTICULAR SIGNIFICANCE TO THE FORM AND CHARACTER OF A TOWN OR VILLAGE, AS IDENTIFIED BY ONE OR MORE OF THE FOLLOWING CRITERIA:-

- (I) **THE LAND CONTRIBUTES TO THE RETENTION OF THE EXISTING FORM AND CHARACTER OF A PARTICULAR SETTLEMENT;**
- (II) **THE LAND PROVIDES AN IMPORTANT OPEN AREA WITHIN A SETTLEMENT WHICH SEPARATES DISTINCT GROUPS OF BUILDINGS OR PARTS OF THE SETTLEMENT;**
- (III) **THE LAND CONTRIBUTES TO THE SETTING OF A LISTED BUILDING, A BUILDING OF TOWNSCAPE QUALITY, ANCIENT MONUMENT OR LANDSCAPE FEATURE, OR CONTRIBUTES TO THE CHARACTER OF A CONSERVATION AREA;**
- (IV) **THE LAND ALLOWS VIEWS INTO THE SETTLEMENT FROM APPROACH ROADS OR OPEN COUNTRYSIDE, VIEWS INTO THE COUNTRYSIDE FROM WITHIN THE SETTLEMENT, AND/OR VIEWS ACROSS TO DIFFERENT PARTS OF THE SETTLEMENT**

- 3.72 The character of the District's towns and villages depends not only on their buildings, but also on the open spaces and their relationship to buildings and features. The particular character of a settlement may be determined largely by the arrangement of buildings around these open areas and the views they give of the surrounding countryside. Apart from their attractiveness, such areas may also have historic or nature conservation significance, or may be part of an important network of green space, which it is desirable to maintain and enhance.
- 3.73 The Proposals Map illustrates the sites which are considered to be important open land and to which the above policy will apply.

The Display of Advertisements

POLICY EN21

ADVERTISEMENTS NEEDING CONSENT WILL NOT BE PERMITTED WHERE THE POSITION, SIZE AND COLOUR OF THE DISPLAY AND THE CUMULATIVE EFFECT OF SUCH DISPLAYS, AFFECTS ADVERSELY THE TOWNSCAPE OR LANDSCAPE QUALITY OF THE AREA

- 3.74 The proliferation of advertisement displays will not be allowed. Advertisements have a significant influence on the street scene in settlements and on the landscape in the rural area. In the case of existing advertisements or those displayed without consent, consideration will be given to the desirability of action to secure the removal of signs that have an adverse impact on the surrounding area.

POLICY EN22

ADVERTISEMENTS NEEDING CONSENT WILL NOT BE PERMITTED IN THE OPEN COUNTRYSIDE

- 3.75 The aim of this policy is to prevent the display of advertisements in the countryside. In particular, free standing advance warning signs will not be permitted
- 3.76 The impact of advertisement displays is of particular concern in Conservation Areas and has been dealt with separately by policies EN16, EN17 and paragraph 3.58. Exceptions to this policy are considered in relation to tourism, in policy T07 and paragraph 9.31.

Sites of Archaeological Interest

POLICY EN23

PLANNING PERMISSION WILL BE GRANTED FOR DEVELOPMENT WHERE THERE WOULD BE NO ADVERSE EFFECT ON THE CHARACTER AND SETTING OF SCHEDULED ANCIENT MONUMENTS OR OTHER IMPORTANT ARCHAEOLOGICAL SITES

- 3.77 Apart from the protection afforded to listed buildings and to buildings in Conservation Areas, many structures and sites of archaeological or historic importance are "Scheduled Ancient Monuments" and these and other important archaeological sites are protected from damaging developments. These sites are all part of the District's rich historic heritage and help form a picture of what life would have been like for the inhabitants of the area through the ages. Scheduled ancient monuments are shown on the Proposals Map and listed in Appendix 3.

POLICY EN24

WHERE DEVELOPMENT PROPOSALS AFFECT IMPORTANT ARCHAEOLOGICAL SITES WHERE PHYSICAL CONSTRAINTS PERMIT, AN ARCHAEOLOGICAL EVALUATION SHOULD BE SUBMITTED PRIOR TO ANY PLANNING APPLICATION BEING DETERMINED. IN THE FEW CASES WHERE DEVELOPMENT IS PERMITTED, AND IT IS NOT POSSIBLE TO PRESERVE REMAINS IN SITU, PLANNING CONDITIONS WILL BE IMPOSED REQUIRING PROVISION TO BE MADE FOR EXCAVATION AND RECORDING, BEFORE OR DURING DEVELOPMENT

21 - CALDECOTT

1. INTRODUCTION AND HISTORY

- 1.1 This Strategy Statement considers the history and issues of particular relevance to Caldecott and must be read in conjunction with the general policies and proposals.
- 1.2 Caldecott is located close to the A45 and shares a Parish with Chelveston, ½ mile to the north. The main framework of the village consists of four farms, including Duchy Farm to the west and Top Farm to the south-east. Caldecott was recorded in the Domesday Book as Caldecote. The Church of St John the Baptist, located between the two villages, dates from the mid 13th Century with main building work taking place in the 14th Century and the 17th Century. RAF Chelveston is located to the east of the village. Today, the base is a communications centre and also contains a housing estate occupied by American servicemen.
- 1.3 In the Parish of Chelveston cum Caldecott there are seven entries on the statutory list of buildings of special architectural or historic interest, four are within Caldecott. Trees near the church are the subject of a Preservation Order.
- 1.4 In 1991 the population of Chelveston-cum-Caldecott Parish was 547 (this figure includes servicemen living at RAF Chelveston). The dwelling stock was 203, which includes 22 dwellings owned by the District Council, all of them within Chelveston village. The mid 1995 estimates are a population of 554 and a dwelling stock of 206.
- 1.5 The village is served by mains drainage and gas, and is visited by a variety of mobile services. A bus service operates to Rushden and Raunds.

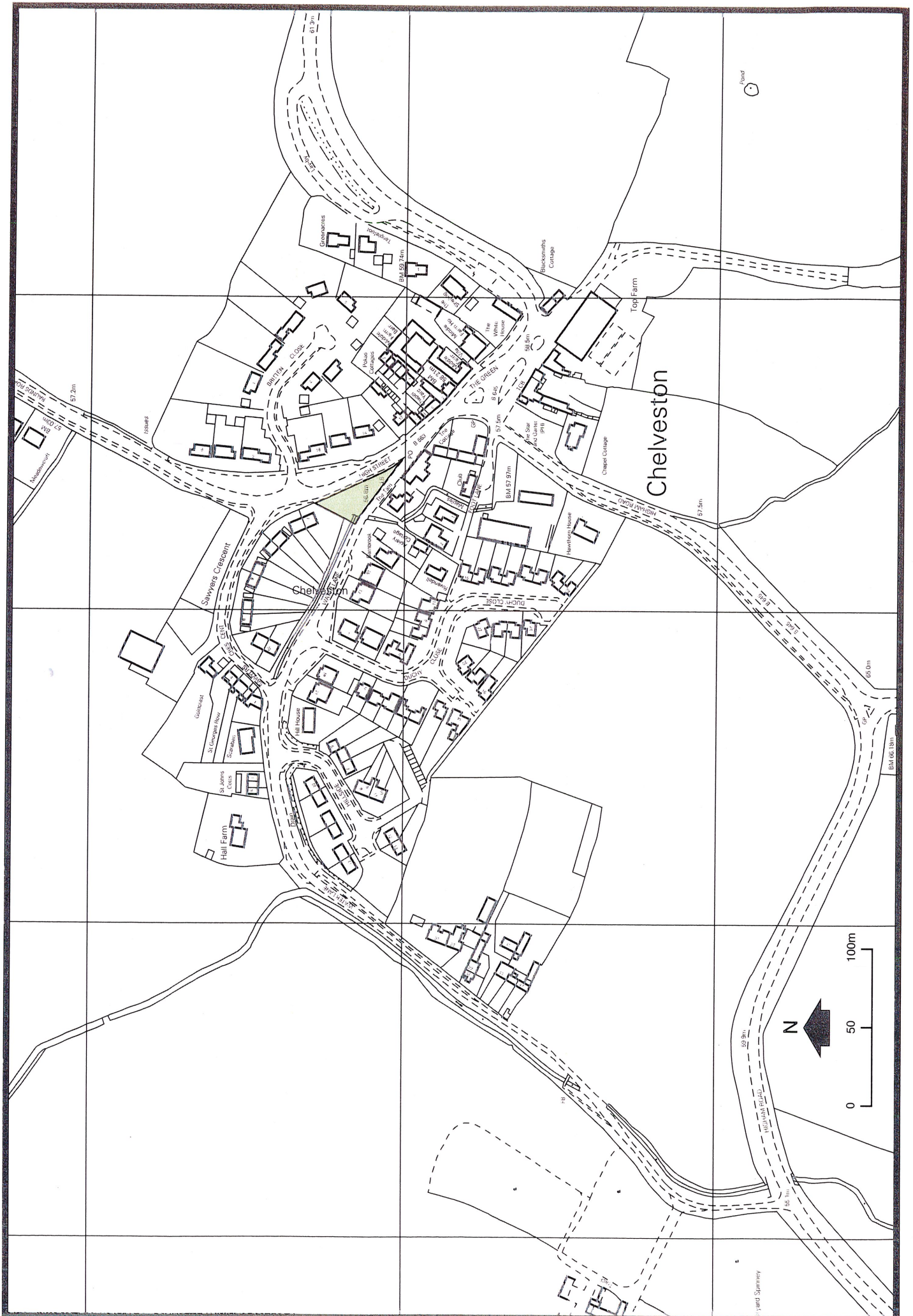
2. DEVELOPMENT STRATEGY

- 2.1 The general form and character of the village is such that it is considered unable to accommodate significant development without affecting that character, or the village setting. Caldecott is therefore categorised as a Restricted Infill settlement in policy H10.
- 2.2 Land is not allocated for housing or employment on the Inset Proposals Map and development will not be permitted on the area designated as Important Open Land. During the Plan period some new housing may be permitted. This will need to be within the confines of the village and must satisfy the criteria set out in policy H12. Schemes for affordable housing may be allowed beyond the confines of the village, provided the criteria set out in policy H16 are satisfied.
- 2.3 Small scale business, general industrial and tourism developments located within the confines of the village may be permitted, provided the criteria set out in policy EMP11 are satisfied. There are existing Business and Storage and Distribution uses at Poplars's Farm. The size and nature of Caldecott means that little scope now remains for further commercial development within the terms of policy EMP11. The provision of recreation and community facilities will be supported by the District Council, within the terms of policy RL1.

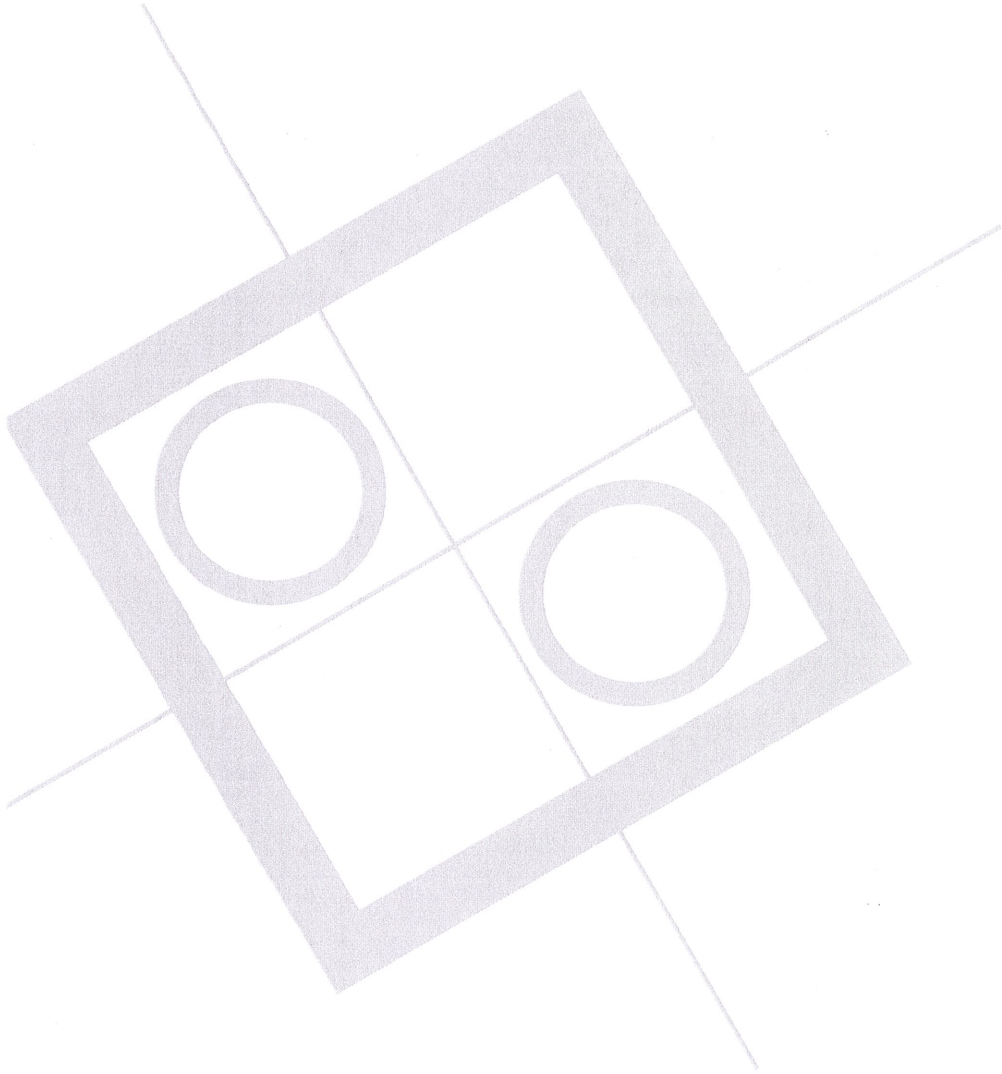
KEY TO PROPOSALS MAP AND INSETS

	Special Landscape Area EN2		Defined Shopping Frontages S5
	Site of Special Scientific Interest EN8		Recreation & Leisure Proposals RL2, IR3, RU4, TH2, IS1
	National Nature Reserve EN8		Highway Proposals TR1
	Local Nature Reserve EN8		Car Park Proposals TR4, IR6, OU2, RA2, TH6
	Nature Conservation Zones EN9		Protected Access Points TR7
	County Wildlife Sites EN9		Schools CF1, HF3, IR5, RU6, TH3
	Important River Reaches EN9		Mixed Use Proposals TH4
	Ancient Woodland EN11		Residential Commitments Para. 4.29
	Conservation Areas EN12-EN14, EN16, EN17, EN19 Para. 3.45		Industrial & Commercial Commitments Para. 5.21
	Important Open Land EN20		Recreation & Leisure Commitments Para. 8.14, S.S.S. 5 Para. 4.22
	Ancient Monuments EN23		Tourism Commitments S.S.S. 45 Para. 2.4
	Historic Parks & Gardens EN25		Local Plan/Inset Boundary
	Residential Proposals H1, H2, IR1, OU1, RU1, TH1, BR1, KC1, RI1, WA1, WO1, CY1, HE1, WN1		S.S.S. refers to Settlement Strategy Statements
	Wharf Road, Higham Ferrers HF1		The following policies/proposals are of general application and should be read with those indicated on the plan:
	Industrial & Commercial Proposals EMP1, EMP2, HF2, IR2, RA1, RU3, BR2		GEN1, GEN2, GEN3, EN1, EN3-EN7, EN10, EN15, EN18, EN21, EN22, EN24, EN26, EN27, H3-H25, EMP3-EMP16, AG1-AG12, S3, S4, S6-S10, RL1, RL3-RL14, TO1-TO7, TR2, TR3, TR5, TR6, TR8, TR9, MIN1, PU1-PU10, CF2-CF8
	Brigstock Camp Proposal BR3		The following policies should be read in association with the relevant Settlement Strategy Statement:
	Defined Shopping Area S1		IR4, RU2, RU5
	Shopping Proposals S2, RU7, TH5		





APPENDIX 7



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Local Green Spaces

The Framework enables local communities to identify, for special protection, green areas of particular importance to them. It goes on to state that

“By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.” (Para 76)

The Neighbourhood Plan identifies two areas of Local Green Space – Farleigh Fields and Moor Lane Fields.

Local Green Space is a restrictive and significant policy designation. The Framework requires the managing of development within Local Green Space to be consistent with policy for Green Belts. Effectively, Local Green Spaces, once designated, provide protection that is comparable to that for Green Belt land.

The Framework is explicit in stating that

“The Local Green Space designation will not be appropriate for most green areas or open space.” (Para 77)

Taking all of the above into account, it is essential that, when allocating Local Green Space, plan-makers can clearly demonstrate that the requirements for its allocation are met in full. These requirements are that the green space is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance; and it is local in character and is not an extensive tract of land.

I observed the two sites allocated as Local Green Space and the topic was considered in some detail at the Neighbourhood Plan Hearing. Moor Lane Fields extends away from the western side of Backwell and Farleigh Fields is located on the eastern side of the settlement. Farleigh Fields is relatively unusual in that, whilst outside the settlement boundary of Backwell, it is surrounded by, largely ribbon, development on all sides.

Whilst both included attractive countryside and contained public footpaths, I observed that the most striking thing about Farleigh Fields and Moor Lane Fields was their substantial size. In this regard, it was established at the Hearing that Farleigh Fields comprises at least 19 hectares and Moor Lane Fields, at least 32 hectares. Taking the latter of these first, there is no doubt in my mind that an area covering some 32 hectares is “an extensive tract of land.”

Consequently, the proposed allocation of Moor Lane Fields does not have regard to national policy, which states that the Local Green Space designation should only be used where the area concerned *“is not an extensive tract of land.”*

I note that, in support of both of the Local Green Space designations, Backwell Parish Council considers that the sites are not extensive “relative to the rural or semi-rural area in which they are located.” However, the Framework does not make any such distinction – it does not state, for example, that Local Green Spaces should not be extensive, except in rural or semi-rural areas.

In the case of Farleigh Fields, it is my view that 19 hectares also comprises an extensive tract of land. To provide some perspective, at least twenty three full size football pitches would easily fit into an area of this size⁶.

Given that the Framework is not ambiguous in stating that a Local Green Space designation is not appropriate for most green areas or open space, it is entirely reasonable to expect compelling evidence to demonstrate that any such allocation meets national policy requirements. Specific to demonstrating that Farleigh Fields, and Moor Lane Fields are not extensive tracts of land, no substantive or compelling evidence has been presented.

A wide variety of arguments were put forward, both in favour of and in objection to the Local Green Space allocations. Whilst I acknowledge these, I find that the direct conflict with national policy, above, means that the Local Green Space Policy does not meet the basic conditions. Furthermore in this regard, I am mindful that nowhere does national policy suggest that a failure to meet policy requirements should be balanced against other considerations when designating Local Green Space. Plainly, the fact that there may be other benefits arising from a Local Green Space designation does not mitigate against, or overcome a failure to meet, a policy requirement.

Notwithstanding the above and my decision below, I do recognise that an enormous amount of work has gone into considering Farleigh Fields and Moor Lane Fields. It is clear from the evidence provided that both areas include attractive, sensitive and well-loved areas of land and there is no doubt in my mind that there are parts of both areas that have been demonstrated to be special to a local community, for a variety of reasons. In seeking to designate Local Green Space, the Neighbourhood Plan was responding to local support – evidenced through a robust consultation process - for the protection of green areas and open space, regarded as special. Whilst individually, or together, these factors do not overcome the failure to meet a specific policy requirement, they are nevertheless important local considerations that have emerged through the Neighbourhood Plan process.

My recommendation below does not mean that the areas for which Local Green Space designations were sought will automatically become available for development. National and local planning policy protects the countryside from inappropriate development. As pointed out by North Somerset Council, this examination only considers the merits of Farleigh Fields and Moor Lane Fields as Local Green Spaces – not as potential housing sites.

⁶ Based around FIFA standards, at 0.62 ha (30 pitches would fit into 19 ha) at 0.82 ha (23 pitches would fit into 19 ha).

I recognise that plan-makers and members of the local community will be disappointed with the recommendation below. However, with regards the significant work that has been undertaken in relation to Local Green Spaces, it is worth emphasising that neighbourhood plans are not the only mechanism through which local communities can seek to make such designations. This can also be achieved through local plans. It may be that the work already undertaken provides a basis for the future promotion of Local Green Spaces that do not conflict with policy criteria.

I recommend the following modifications:

- **Delete section 12 Local Green Spaces. For the avoidance of doubt, I recommend that the Neighbourhood Plan does not contain a Local Green Space policy**
- **Delete Local Green Space Map**
- **Rather than lose sight of the aspiration, I recommend that an addition is made to paragraph 6.15 of the Neighbourhood Plan. This should state that:**
- ***“The community consultation undertaken during the preparation of the Neighbourhood Plan highlighted that two areas of land at Moor Lane Fields and Farleigh Fields are valued by the local community for reasons including their character, recreational value and the richness of wildlife. Backwell Parish Council will work with North Somerset Council to establish how recognition of their valuable features may, in future, be incorporated into the development plan.”***
- **Add, below revised para 6.15, *“Community Action: Backwell Parish Council will seek to promote the allocation of appropriate areas of Local Green Space at Moor Lane and Farleigh Fields in the development plan.”***