15 November 2018

Planning Policy
South Northamptonshire Council
The Forum
Moat Lane
Towcester
Northamptonshire
NN12 6AD

Correspondence by email:
localplanconsultation@southnorthants.gov.uk

Dear Sirs

Representations to the South Northamptonshire Council Local Plan Part 2
On behalf of Boddington Parish Council

Savills is instructed by Boddington Parish Council to submit written representations to the proposed allocation of Jubilee Field as a Local Green Space as part of the proposed South Northamptonshire Local Plan Part 2. Consultation on Local Green Space designations took place in May 2018. A technical consultation on the methodologies used for Local Green Space, among other topics, has been undertaken by the Council to inform the evidence base underpinning the Plan.

This correspondence is accompanied by a separate letter from Boddington Parish Council, which should be reviewed in detail as part of these representations. This correspondence is furthermore accompanied by a letter from Boddington Parish Council to South Northamptonshire Council, dated 12 June 2018. This, too, should be reviewed in detail.

On behalf of Boddington Parish Council, we raise our strongest objection to the proposed designation of Jubilee Field as a Local Green Space. We set out below consideration of this proposed Local Green Space designation, and invite further comment from officers in due course.

Site characteristics

The site is identified in the Submission Plan as LGS 1 Boddington (Upper): Jubilee Field, as its extent is clearly shown in supporting plans. The site comprises circa 1.4ha between London Road/Townsend Lane and Frog Lane. The site is undeveloped and contains no built form. As is also articulated in the supporting evidence base to the plan, there are no existing allocations or designations across the site. It is also noted that, given its location within the confines of Upper Boddington, the principle of residential development across the site may be appropriate under the current policy context.

It should be noted that, as per the accompanying material prepared by Boddington Parish Council, there are a number of inconsistencies in the description of the site as stated in the proposed Submission Local Plan Part 2. As a matter of factual correctness, any such inconsistencies must be addressed. This is key, given the various value judgements made of the site by officers in assessing the site’s credentials.

Emerging Planning Policy context

The NPPF treats the policies for managing Local Green Space akin to those for managing development in the Green Belt. That is to say that policies are restrictive, and will generally regard most development as inappropriate except where very special circumstances apply.
Policy GS2 deals with Local Green Spaces and outlines two policy strands. The first states simply that development proposals which would result in the loss of a local green space or would have a harmful impact on the features which make it locally significant will not be permitted unless very special circumstances can be demonstrated. The second strand notes that the only form of development considered appropriate within a local green space is that which is:

a) is ancillary to the use of the space or to any buildings on that land; and
b) will enhance its beneficial use; and
c) is appropriate in scale; and
d) will contribute positively to the character and quality of the space

We set out below consideration of the above proposed policy as it relates to Jubilee Field.

The proposed policy does not allow for sufficient flexibility over the plan period for the delivery of housing in the village. This is a short-sighted approach to housing delivery, and risks undermining the plan's longevity, particularly as it may relate to the longer term sustainability and capacity of Boddington to adapt to changing housing need in future.

The site assessment for Jubilee Field (May 2018) acknowledges the Parish Council’s intent to develop the site (or parts thereof) for residential development. This intention seeks to align development potential with the core principles of sustainable development which run central to the provisions of the National Planning Policy Framework. The existing policy context recognises the acceptability in principle of the site to yield a level of residential development, against the provisions of the adopted 1997 Local Plan. Whilst the Plan is somewhat time-expired, the acceptability of delivering residential development within the village confines remains. This is in fact reiterated in the emerging Local Plan Part 2 at Policy SS1, notwithstanding any cross reference to the proposed designation at Policy GS2. Policy SS1 allows for development in accordance with the scale, role and function of Boddington, which we strongly consider would include for modest residential development within the settlement boundaries (small villages category). The site at Jubilee Field falls clearly within this boundary, and remains the only substantially undeveloped part of the village upon which appropriate development could take place over the plan period. This need not relate to the development of the whole site, but could simply refer to sensitive modest development on part of the site. In this regard, there appears a level of inconsistency with the provisions of Policy SS1 which seek to allow appropriate development within the settlement boundary for Boddington, and the specific designation of the site as Local Green Space which conversely seeks to restrict such development. For the reasons set out below, we consider further why any such designation is inappropriate in the case of Jubilee Field.

Whilst officers seek to demonstrate that the site is inappropriate for the future development of residential dwellings, the designation of the site as a Local Green Space should not simply be used as a tool in preventing the possibility of such. Against a backdrop of increasing housing need, any mechanism that could disproportionately restrict development in otherwise acceptable locations within the village confines should be avoided. This is particularly salient given the highly restrictive nature of any Local Green Space designation, which would place an unduly forceful requirement on any future applicant to demonstrate very special circumstances in favour of development. Whilst the NPPF does encourage the designation of land as Local Green Spaces where specific criteria apply, it clearly recognises this should be consistent with the local planning of sustainable development and should complement investment in sufficient homes, jobs, and other essential services (as at paragraph 99 of the NPPF). Chapter 2 of the NPPF is robust in its definition of achieving sustainable development, and acknowledges the need to balance economic, social and environmental objectives. Whilst this does include for the protecting of the natural environment, it also includes for the efficient use of land, and the need to support strong, vibrant communities and ensuring that a sufficient number and range of homes can be provided to support the needs of present and future generations. It is both this emphasis on present and future need that requires closer consideration. Put simply, the Parish Council’s willingness and intention to develop the site (or parts thereof) should be more roundly considered in this context.
The technical assessment of the site refers to the need for further information to be provided through the pre-application process or the planning application process to “overcome these [planning] issues”. Yet, in so doing officers explicitly acknowledge that there may be scope to overcome any specific planning issues. The technical assessment seems on this basis somewhat weak, insofar as it fails to provide its own sufficient evidence to support the designation beyond what appears a high level judgement of visual landscape value, and comment on its use among local populations. Prior to the designation of the site as a Local Green Space, we would expect a more detailed assessment be made available that properly and wholly quantifies the value(s) of the site, in line with meeting the criteria of Paragraph 100 of the NPPF. This includes that the site is:

a) in reasonably close proximity to the community it serves;
b) 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

c) local in character and is not an extensive tract of land.

Whilst comment on the above has been provided by officers, the level of detailed assessment seems lacking at this stage of the process. It is difficult to fully assess the site against the above national criteria when a detailed technical assessment has not been made, particularly in respect of landscape matters. The designation of the site is therefore, in many respects, premature and based on insufficient technical assessment.

Moreover, we consider that the development management process itself can be, and should be, more than sufficient in controlling development and/or preventing any level of inappropriate development at the site. The policies of the Local Plan Part 2, alongside those of the NPPF, should also provide officers with the necessary confidence to consider any future development that may not, in its own right, be of harm. One such example is Policy INF2 which itself affords a high level of protection to key community facilities including village greens, parks, etc. Such a policy itself should provide a level of reassurance to officers that the site could not be unreasonably developed for inappropriate uses, whilst maintaining the necessary level of flexibility should further dwellings be required during the plan period. Therefore, we ask that officers reconsider the designation of Jubilee Fields as a Local Green Space, and instead defer any management of the site’s development potential back to the officers or consideration through the application process, as is the most appropriate mechanism in this case.

As is noted in the technical assessment, the site is very well related to the village. Whilst there is repeated reference to the contribution of the site to local landscape, character and setting, there is no reason why future development of appropriate scale could not be delivered in a manner sympathetic to such matters. The site is of an appropriate size to allow for modest scale development, retaining local landscape features and any perceived landscape or community value. The site’s location within the village is, as noted elsewhere, also a reason in favour of its suitability of residential development in due course.

As an aside, we note that national planning policies furthermore allow for the allocation of Local Green Space through neighbourhood plans. Given the level of local opposition to this particular designation, it is not unreasonable to suggest that any consideration of the allocation of the site as a designated Local Green Space may be more appropriately considered through a more localised plan-making process, rather than the decidedly more ‘top-down’ approach proposed by the emerging Local Plan Part 2. This is particularly relevant in the context of an insufficient level of site assessment provided to date. Officers are encouraged therefore to consider this approach as an alternative to the currently proposed designation of Jubilee Fields as part of the Local Plan Part 2.

Summary

These representations raise a number of fundamental concerns regarding the proposed allocation of Jubilee Field, Upper Boddington as Local Green Space. There is a lack of sufficient and appropriate evidence provided by officers to inform this proposed designation, which is itself deemed unnecessary in managing development in the village. The site represents a logical complement to future housing delivery in the settlement, and remains the only available site within the village boundary capable of responding to future housing need. The
designation of the site as Local Green Space is wholly inappropriate given its inconsistency with the need for housing delivery and sustainable development, the lack of appropriate evidence base, and the measures present elsewhere in the Local Plan Part 2 which would in their own right effectively protect the character and value of the site (where demonstrated by technical evidence) whilst still allowing the flexibility to deliver residential dwellings to meet need.

We look forward to engaging further on this matter.

Should you have any immediate questions on the above, please do not hesitate to contact me.

Yours sincerely

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Planner