

Appendix 3 – Extract from EXAM 19

Policy NEH3 Historically and Visually Important Local Green Spaces

28. Thank you for your response (EXAM 18c) to the matters raised in relation to my letter dated 6 November (EXAM 17) and the associated summary table (EXAM 18d).
29. As set out previously, I appreciate that there is a considerable background and long history to the concept of Historically and Visually Important Open Space (HVIs) in Kettering and a great deal of work and assessment as well as consultation has taken place over a number of years. I am also aware of the protection previously afforded to Environmentally Important Open Spaces (EIOS) in the towns and villages by unsaved Policy 94 of the 1995 Local Plan. I will not repeat the concerns set out in my previous letter (EXAM 17) at length, but confirm that even having regard to the further information provided, I remain of the view that the Council has sought to roll forward sites previously assessed and identified to be suitable as HVIs, as Local Green Space (LGS) and to elevate their status without sufficient justification.
30. HVIs are not the same as LGS. The purpose of HVIs is set out in the 2012 Site Specific Proposals Local Development Document Background Paper: Open Space and Allotments. This seeks to protect historically and visually important open spaces where they make a significant positive contribution to any settlement within the Borough, Conservation Area or setting of a Listed Building. The site assessment criteria at section 4 relate exclusively to whether the site is important to the settlement (not to the community). In contrast, the purpose of LGS is to allow communities to identify and protect green areas of particular importance to them (not necessarily to the settlement). It seeks to provide special protection to only those sites which are demonstrably special and means that such areas are subject to the same stringent planning policy safeguards as land designated as Green Belt. In my view, this is quite a high bar to reach, and this most highly restrictive designation is not appropriate for most green areas or open spaces. Rather, it affords a level of protection that is in my experience applied sparingly.
31. Whilst I note the Council's view to the contrary and reference to the Wellingborough Plan, it is my firm view that it is fundamental to the LGS designation that the spaces are identified by the local community. The Council accepts in the summary table that a number of the proposed LGS spaces were not put forward by the local community. Whilst I note that the designation of some of these spaces were subsequently supported by local residents, Parish/Town Councils and elected members, that is not the same as them having been identified by communities. General support/no objections to the continued/reinstated protection of sites formerly identified as EIOS and/or HVI sites identified by the Council or their consultants as important to the settlement, is insufficient to meet the specific terms of LGS as set out in the Framework.

32. Unless there is any further evidence that I have not seen relating to their identification, I consider that those spaces not put forward by the local community in EXAM 18d (as described in footnote 1), do not meet the requirements of the Framework for designation as LGS and should not be allocated as such. They are not consistent with national policy and are unjustified.
33. I have considered the other spaces in EXAM 18d which the Council indicates to have been put forward by the community. My comments on these are set out in the table in Appendix 1 to this letter. This includes an indication as to whether I consider the sites to meet the requirements of the Framework for designation as LGS or not. It finds that on the basis of the evidence before me, a number of those sites are also unjustified for the reasons set out. As indicated in the table, they should also be removed from the Plan as LGS.
34. I appreciate that my findings in relation to this matter will be disappointing for the Council. Whilst I note the wish to gather further evidence from Town and Parish Council's to give them the opportunity to comment on whether they consider the proposed spaces to be special or not, this would not address my in principle concerns with regard to the sites that were not identified by the local community as intended by the Framework.
35. In terms of the implications of the removal of the LGS designation from these sites, the Council indicates in EXAM 18c that the LGS designation is intended to apply to spaces not covered by the other open space typologies. I note that HVI067 in Rushton and parts of HVI057 in Burton Latimer and The Damms in Desborough are also included as open spaces under Policy NEH4. It may be that these are anomalies, but if they are not, this approach should be clarified. Despite the removal of the LGS designation in the instances that I recommend, I am content that the spaces in question would nevertheless be protected by other policies in the Plan and the JCS, including, but not limited to, those relating to open countryside, heritage assets, green infrastructure, and the development principles for both the rural area and individual settlements. The Guidance is clear that if land is already protected by designations (such as Conservation Areas) consideration should be given to whether any additional local benefit would be gained by designation as a LGS.
36. Turning to the wording of the Policy itself, we discussed at the hearings the need for it to reflect the approach to the Green Belt set out in the Framework. Whilst I note the proposed changes to the supporting text at page 40 of EXAM 18a, these do not go far enough. Both the Policy itself and the supporting text need to reflect paragraphs 143 and 144 of the Framework. As such, paragraph 2 of Policy NEH3 should add 'inappropriate' before development. Paragraph 3 should be replaced by the following text. Inappropriate development in the Local Green Spaces will be not be permitted except in very special circumstances. Very special circumstances will not exist, unless the potential harm to the Local Green Space is clearly outweighed by other considerations. The proposed changes to the

supporting text at page 40 of EXAM 18a which refers in error to exceptional circumstances should be deleted.

37. The supporting text to this policy should be expanded to explain the background to, and justification for, Local Green Spaces with reference to paragraphs 99, 100 and 101 of the Framework. It needs to be made clear that once designated Local Green Spaces will be subject to the same planning policy safeguards as land designated as Green Belt and that as such the designation will provide a special protection and only allow new development in very special circumstances. It would also be helpful to set out here that the development of new buildings in a LGS is unlikely to be appropriate, but to acknowledge that other forms of development may not be inappropriate provided, for example if they preserve the attributes which led to the designation of the site as LGS (I think this is what the new text proposed to paragraph 8.41 is concerned with). The policy should also be amended to include a list/table of the spaces that are to be designated and shown on the policies maps.

EXAM 19 Appendix 1 - Local Green Space (LGS) Inspector's Comments Table

LGS	Identification (Council's text)	Inspector's Comments	Recommendation
Kettering & Barton Seagrave			
HVI068	No	See letter	Remove as LGS
HVI053/071	No	See letter	Remove as LGS
Burton Latimer			
HVI056 c & e	Identified broadly as an area for protection of open space through the Options Paper consultation by the Town Council (Rep No 2125 – Page 40 of Appendix 3)	<p>In response to consultation on the Options Paper 2012 Rep 2125 from the Town Council seeks the 'preservation of green open space' in three areas (around Burton Latimer Hall in Kettering Road, in the Ise Valley, and for views to the Parish Church from the A6 bypass on the Kettering side of the Higham Road junction).</p> <p>From the summary provided, this is a generalised comment that does not indicate how any such preservation should be sought and was made prior to the concept of LGS being identified in the Framework.</p> <p>The comment appears to be the basis for the designation of the resultant three areas of LGS (56 c and e, 58b and 57). However, no indication of the extent of the geographical area affected and no reasons as to why the land should be considered for designation are given. Nor, are any details provided as to why the land is of particular importance or special to the local community.</p> <p>Moreover, consultation with Parish Councils and Landowners took place in 2015 on the Historically and Visually Important Open Space Background Paper (which introduced the reference to LGS from the Framework) (Planning Policy Committee (PPC) on 8 June 2016). At this time, Rep 35 from the Town Council comments that 'there is no reason for the proposal to introduce this new level of control'.</p>	Remove as LGS

		<p>As such, I am not convinced that these three resultant LGS sites are demonstrably special to the local community.</p> <p>Having regard to all these matters, I am not persuaded that this space is justified as a LGS.</p>	
HVI058b	Identified broadly as an area for protection of open space through the Options Paper consultation by the Town Council (Rep No 2125 – Page 40 of Appendix 3)	As above	Remove as LGS
HVI057	Identified broadly as an area for protection of open space through the Options Paper consultation by the Town Council (Rep No 2125 – Page 40 of Appendix 3)	As above	Remove as LGS
HVI057a	Yes (Rep No 54 – Page 46 of Appendix 3)	<p>Representation 54 to the Draft Plan (respondent 7695290) seeks the extension of the boundary of adjacent HVI057 ‘to include the area from the town boundary to the river Ise as there is no rational boundary as drawn’.</p> <p>Part of that suggested land had been previously considered by the Council under HVI072 and discounted, but the land to the west (HVI057a) had not been previously assessed.</p> <p>The summary of the representation as provided, is limited to mapping issues associated with nearby HVI057 and the creation of a rational boundary. No indication is given as to the particular value or importance of a wider site (incorporating HVI057a) to the representor or the local community.</p> <p>I can find no further reference to why the site is demonstrably special to the local community in the subsequent technical assessments of this site. The HVI Background Paper Update Oct 2019 indicates only that the site is visible from surrounding open space and surrounding residential properties, with views out across the site to the Ise Valley and countryside beyond.</p>	Remove as LGS

		<p>The site was discussed at PCC on 5 November 2019, where it was felt the site is important to local residents who make regular recreational use of the area. PCC resolved that the site should be included for 'its amazing views and contribution it makes to the neighbouring designation and access to the river Ise'.</p> <p>In practical terms, it seems to me that these reasons (raised only by PCC and not by the community itself) relate primarily to the site's contribution to the neighbouring space. I am also mindful that HVI057a was put forward as an extension to neighbouring HV1057, which itself was not specifically identified as a LGS by the local community or supported by the Parish Council (see comments above).</p> <p>Having regard to all these matters, I am not persuaded that this space is justified as a LGS.</p>	
Desborough			
The Damms	Yes (Representations included from page 54 of Appendix 3)	<p>This site was put forward through the Landowner and Town/Parish Council consultation in 2015. The summary of the comments made to that consultation indicate that the Damms was where the Anglo Saxons attempted to defend the settlement against the Danes, has been left undisturbed for over 1,000 years and is a place of recreation and beauty and natural asset to the town. The representor regards it to be both historically and visually important (Rep 55).</p> <p>The June 2016 Background Paper indicates that the designation is sought because the land is highly visible, is important to the setting of listed buildings, and makes a high contribution to the setting from outside the settlement boundary. The assessment by River Nene Regional Park Inspired Places (RNRP) in June 2016 indicates that the site borders the most historic area of Desborough around the church, key to the setting of the town, and to have a heavy footfall from walkers.</p>	Retain as LGS

		Taking these factors into account, I am satisfied that the proposed designation of the space as LGS is justified. The full reasoning for this will be provided in my final report.	
HVI069	Yes (Representations included from page 52 of Appendix 3) <i>Matters Statement submitted by Black Box Planning (in relation to previous objections to the draft Plan)</i>	<p>Respondent 173073 Town Council (rep 1932) to the 2012 Options Paper recommends the site as an HVI due to the ancient and rare ridge and furrows which are remains of Anglo Saxon cultivation.</p> <p>The September 2015 Background Paper indicates that the ridge and furrow are an important landscape feature. The site contains well preserved ridge and furrow remains which Northamptonshire County Council Archaeology advises is best appreciated and understood in the context of the landscape.</p> <p>There is generally unspecific support from the Town Council and residents in the responses to the Landowner and Parish Council consultation in 2015 (as well as an objection to the designation at this stage and in relation to the Draft Plan of which I am aware). Nevertheless, I am satisfied that the proposed designation has been identified by the local community and reasons for its particular local and historic significance have been set out by them.</p> <p>Taking all these factors into account, I am generally satisfied that the proposed designation of the space as LGS is justified. The full reasoning for this will be provided in my final report.</p>	Retain as LGS
Rothwell			
HVI054	No but designation supported by the Town Council (Rep No 1370 – Page 78 of Appendix 3)	See letter	Remove as LGS
Ashley			
HVI001	Yes (Initial Parish Council consultation – Page 81 of Appendix 3)	This proposed site arises from an initial consultation which informed the Open Space and Allotments Background Paper 2012. The Parish Council indicated that it ‘would like to see the open space between Green Lane and Main Street protected as before’. I note that much of the site was previously identified as EIOS in the 1995 Local Plan.	Retain as LGS

		<p>Responses to the 2012 Options Paper refer to the space between Green Lane and Main Street as an essential space which delineates one of the loops of the archaeologically important double loop layout of the village and indicates that the retention of this loop is crucial to the historic character of the village.</p> <p>The RNRP Assessment Feb 2014 finds that the site is integral to the village and provides an open space between Main Street and the properties on Green Lane. It has been an open space in the village since the earliest available maps, provides important views to the church, listed buildings and the Conservation Area.</p> <p>Whilst the comments as to the site's value and importance originate from consultation that pre-dates the introduction of the concept of LGS in Kettering, on balance I am content that the proposed designation has been nevertheless been identified by the local community and reasons for its particular local and historic significance have been set out by them.</p> <p>Taking these factors into account, I am generally satisfied that the proposed designation of the space as LGS is justified. The full reasoning for this will be provided in my final report.</p>	
HVI002	No but designation supported by the Parish Council and residents through consultations (Representations included from page 85 of Appendix 3)	See letter	Remove as LGS
HVI081	Yes (Representation 1164 – Page 86 of Appendix 3)	This proposed site was put forward through the Options Paper consultation in 2012. Representation 1164 supports the other two spaces in the village (see above), but indicates that 'other areas could be considered too, eg. behind the church yard?'	Remove as LGS

		<p>This appears to be the basis for its designation, but no indication of the extent of that area, why it should be considered for designation, or how it is special to the local community is given by the respondent.</p> <p>There was some general support when the site appeared in the Draft Plan in 2018 but no reasons for this support are given. Although Rep 1170069 supports the HVI status of the land, this states only that this is because of its 'important location behind the historic St Mary's church' and 'any development of any kind on this land should never be allowed'. Rep 1173937 refers to historic settlements beneath the ground in the area surrounding the church which should not be developed, along with the need to stop developers both on the site and on other land surrounding the village.</p> <p>In my view, these points relate primarily to protecting the land from development (which may well be achieved by other designations/policies) and are insufficient to indicate that the site is demonstrably special to the local community.</p> <p>Furthermore, the site as identified in the Plan includes two fields. One behind the churchyard (as raised in representation 1164) and another behind No 7 Main Street. As such, the extent of the space proposed as LGS appears to go beyond that originally referred to by the community</p> <p>Objections were also received through the Draft Plan in 2018. Rep 1174168 suggests the allocation of the site was proposed without consultation with the village. Rep 1170568 finds the site to be little different to any of the other green spaces that surround the village and thinks that the reasons for this designation do not seem coherent or logical.</p> <p>Having regard to all these matters, I am not persuaded that this space is justified as a LGS.</p>	
Braybrooke			

HVI006	No but designation supported by the Parish Council and residents through consultations (Representations included from page 108 of Appendix 3)	See letter	Remove as LGS
HVI007	No but designation supported by the Parish Council and residents through consultations (Representations included from page 108 of Appendix 3)	See letter	Remove as LGS
Cranford			
HVI013	No but the designation has been supported by the Parish Council (Representation 73 on page 121 of Appendix 3 and Representation 23 on page 125)	See letter	Remove as LGS
HVI014	No but the designation has been supported by the Parish Council (Representation 73 on page 121 of Appendix 3 and Representation 23 on page 125)	See letter	Remove as LGS
HVI015	No but the designation has been supported by the Parish Council (Representation 73 on page 121 of Appendix 3 and Representation 23 on page 125)	See letter	Remove as LGS
HVI080	Yes (Rep 1381 – Page 119 of Appendix 3)	The Council indicates that this site was put forward through the Options Paper consultation in 2012. Cranford Parish Council's representation at that time states 'there are historical and visual open spaces such as, Cranford from Barton Seagrove, from the Cranford Road east to the Allege valley, and St Andrews Church and Hall' No geographic area is specified and it is not clear to me how this	Remove as LGS

		<p>representation led to the identification of HVI080 specifically. Nor is any indication given by the PC as to what is special about the site.</p> <p>The Council's response to representations to the Draft Plan (page 121 of EXAM 18c) indicates that the area was originally identified through work undertaken by a third party. Whilst no further explanation is given, I am aware that the site is considered in the RNRP Feb 2014 Assessment. As such, it may have been the Council's consultants who identified the site.</p> <p>Although the site is subsequently supported by the PC, I can find no indication of what the site's particular local significant or importance is in subsequent consultations. The PC's comments to the Publication Plan indicate that the HVI designations in the village (generally) are crucially important in maintaining the designation of a conservation village. However, the Guidance indicates that if land is already protected by designation (such as a Conservation Area) consideration should be given as to whether any additional local benefit would be gained by designation as LGS.</p> <p>In my view, these points are insufficient to indicate that the site is demonstrably special to the local community.</p> <p>There are objections to the site when PCs and Landowners consulted in 2015 (PC 8 June 2016) and objections to the Draft Plan and the Publication Plan.</p> <p>Having regard to all these matters, I am not persuaded that this space is justified as a LGS.</p>	
Geddington			
HVI016	Yes (Initial Parish Council consultation – page 128 of Appendix 3)	In the initial consultation to inform the Open Space and Allotments Background Paper 2012 the PC stated that the 'retention and protection of the EIOS in the centre of the village to be very important'. However, no mention is made of why the land is special to the local community.	Remove as LGS

		<p>Additionally, HVI016 is more extensive than the area of EIOS in the 1995 Local Plan (it extends further westwards).</p> <p>Although there is a representation of general support for the designation in the Landowner and PC consultation 2015, I can find no indication of what the site's particular importance or local significance is in subsequent consultations.</p> <p>In my view, this is insufficient to indicate that the site is demonstrably special to the local community.</p> <p>Having regard to all these matters, I am not persuaded that this space is justified as a LGS.</p>	
HVI079	Yes (Representation 1356 on page 130 of Appendix 3)	<p>The site is identified through the Options Paper consultation in 2012. Rep 1356 indicates that the area to the north of the river Ise bordering Mill Farm (and the properties of Nos 33, 35 and 37 Newton Road) is part of the historical and visual aspect either side of the river and should be greened over. Effectively, this Rep seeks the inclusion of this land as part of HVI016.</p> <p>Other than this, I can find no indication of what the site's particular importance or local significance is, in this, or any subsequent consultation.</p> <p>The February 2014 RNRP Assessment finds that whilst the site provides views to Mill Farm and the setting for it, it makes a low contribution to the setting of the village when viewed from outside the village boundary and does not meet the criteria as HVI. Despite this, in the 2015 Background Paper the site is found to provide a positive contribution to the setting of the village and the Newton Mill Farmhouse listed building and relates to the adjacent area of open space at HVI016 which provides an important space running through the centre of the village.</p>	Remove as LGS

		<p>This is insufficient to indicate that the site is demonstrably special to the local community, particularly given my conclusions in relation to neighbouring HVI016 above.</p> <p>Having regard to all these matters, I am not persuaded that this space is justified as a LGS.</p>	
Grafton Underwood			
HVI017	No but through the Initial Parish Council consultation the open space in front of the Church was identified as an area for protection.	See letter	Remove as LGS
HVI018	No	See letter	Remove as LGS
Harrington			
HVI021	No but the designation has been supported by the Parish Council (Representations included from page 145 of Appendix 3)	See letter	Remove as LGS
Little Oakley			
HVI022	No but the designation was supported by the Parish Council through the Options Paper consultation (Representation 2129 – Page 154 of Appendix 3)	See letter	Remove as LGS
HVI023 & HVI026	No but the designation was supported by the Parish Council through the Options Paper consultation (Representation 2129 – Page 154 of Appendix 3)	See letter	Remove as LGS
HVI024	No but the designation was supported by the Parish Council through the Options Paper	See letter	Remove as LGS

	consultation (Representation 2129 – Page 154 of Appendix 3)		
HVI025	No but the designation was supported by the Parish Council through the Options Paper consultation (Representation 2129 – Page 154 of Appendix 3)	See letter	Remove as LGS
Loddington			
HVI027	Yes (Initial Parish Council consultation – page 157 of Appendix 3)	<p>The initial consultation with the PC to inform the Open Space and Allotments Background Paper 2012 stated ‘two areas of EIOS should be retained’. These cover the three areas of LGS now proposed in the Plan.</p> <p>However, whilst I am aware of the findings of the Council’s/consultant’s assessments of the sites in Loddington, I can find no indication of why the site is considered to be of particular importance/demonstrably special to the community, in this, or any other subsequent consultation on the proposed LGS designation.</p> <p>From the summaries provided in EXAM 18c there was no support for the proposed LGS designation when Landowners and PCs were consulted in 2015 or when comments were sought on the Draft Plan (PCC Jan 2019). There is a single comment of support to the Publication Plan that indicates the three HVI are important to maintain the rural character of the village. However, this is likely to be protected by other designations/policies.</p> <p>I am aware of the views of representor 17 who opposes a change to the proposed LGS status of HVI028. These comments relate overwhelmingly to concerns about the development of the site. Whilst I appreciate these concerns and the strength of local feeling referred to, the LGS designation is not simply a means to block development. I have seen nothing in the information provided to demonstrate why the site is demonstrably special to the local community (so as to warrant its allocation as LGS).</p>	Remove as LGS

		<p>I am also mindful that the site is within the Conservation Area. The Guidance indicates that if land is already protected by designation (such as a Conservation Area) consideration should be given as to whether any additional local benefit would be gained by designation as LGS.</p> <p>Having regard to all these matters, I am not persuaded that the three spaces in Loddington are justified as LGS.</p>	
HVI028	Yes (Initial Parish Council consultation – page 157 of Appendix 3)	See above	Remove as LGS
HVI054	Yes (Initial Parish Council consultation – page 157 of Appendix 3)	See above	Remove as LGS
Pytchley			
HVI033	No but the designation was supported by the Parish Council (Representation 4 on page 179 of Appendix 3)	See letter	Remove as LGS
Rushton			
HVI070 (Incorporating HVI036, 037 and 038)	Parts of the site were put forward by the local community (Representation 482 on page 187 of Appendix 3 and Representation numbers 1 and 11 on page 188 of Appendix 3)	<p>As part of the initial consultation to inform the Open Space and Allotments Background Paper 2012, the Parish Council indicated it ‘would like policy to protect views from/of the church. Would like policy to protect views from Glendon into the village’.</p> <p>This request appears to have been translated into the four HVIs in the Open Space and Allotments Background Paper Feb 2012 - 36, 37, 38 and 67.</p> <p>No reasons are given as to why these spaces are demonstrably special to the community. It is presumed that the Council identified and included them in order to protect the views highlighted by the PC.</p> <p>Representation 482 to the Options Paper consultation 2012 indicates only</p>	Remove as LGS

		<p>that the three proposed HVIs (36,37 and 38 should be joined up in to a continuous belt). No reasons for this are given.</p> <p>Reps 1 and 11 to the Landowner and Town and Parish Council consultation in 2015 seek further additions to the subsequently combined sites, to add in the area alongside/south of the brook. Rep 1 does provide some reasoning for this and indicates that ‘the land has been pasture land for over 30 years and is very much an open space enjoyed by the village and through which a public footpath runs up to Glendon Road’.</p> <p>However, these reasons are given only in relation to that land which makes up the extension to HVI070 (land alongside the brook, assessed as 70a in the RNRP Assessment June 2016). They do not relate to the wider site (which has been identified only to protect views) and are in any event insufficient to indicate that the additional land in question is in itself demonstrably special.</p> <p>I do not accept that comments requesting the extension of HVI070 automatically demonstrate that the space is demonstrably special to the local community as suggested by the Council (page 190 of EXAM 18c). This is particularly so when reasons as to why the originally identified space is special to the local community are absent.</p> <p>As I identified in my previous letter (EXAM 17) I am also concerned that HVI070 is extensive tract of land. The Council indicates that it covers some 11.5 hectares. I note the Council’s wish set out at paragraph 2.23 of EXAM 18c to consider the inclusion of the smaller sites originally identified in the 2012 Background Paper. However, since I have seen no evidence to show that these were identified by the community to protect areas of particular importance to them, and nothing to indicate that they are demonstrably special to the local community, I am not convinced that these smaller sites meet the tests for LGS in the Framework.</p>	
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		Having regard to all these matters, I am not persuaded that the spaces proposed in Rushton are justified as LGS.	
HVI067	No	See letter	Remove as LGS
Stoke Albany			
HVI040	No but the designation was supported by the Parish Council (Representation 30 on page 194 of Appendix 3)	See letter	Remove as LGS
Sutton Bassett			
HVI042	No but one representation was received supporting the designation (Representation 1659 on page 205 of Appendix 3)	See letter	Remove as LGS
Warkton			
HVI043	No	See letter	Remove as LGS
HVI044	No	See letter	Remove as LGS
Weekley			
HVI045	No	See letter	Remove as LGS
HVI046	No	See letter	Remove as LGS
HVI047	No	See letter	Remove as LGS
Weston by Welland			
HVI048	No but one representation was received supporting the designation (Representation 1392 on page 222 of Appendix 3)	See letter	Remove as LGS
Wilbarston			
HVI085	Yes (Put forward by the Parish Council, representation 70 on page 226 of Appendix 3)	Comments from the Parish Council to the consultation with Landowners and Parish Councils in 2015 indicate that a new site is promoted west of the church because it offers views from the church yard across the Welland Valley and towards the church across fields which give a true sense of Wilbarston in its setting above the valley as it was when the church was built.	Retain as LGS

		<p>RNRP assessed the stie and found it sets the character of the listed church and war memorial and sets further context for the Scheduled Ancient Monument, is visually important, publicly accessible and provides important views to Stoke Albany, the church and to the open countryside.</p> <p>In this instance the space was identified for inclusion as an LGS specifically, rather than as a rolled forward EIOS or simply an HVI. An explanation and justification for its identification has been provided by the local community, rather than by the Council or their consultants (although these subsequent technical assessments back up the views of the community). The Parish Council refers to the space's historic significance and gives reasons why it holds a particular local significance. As such, I am content that it is demonstrably special to the local community.</p> <p>Taking these factors into account, I am generally satisfied that the proposed designation of the space as LGS is justified. The full reasoning for this will be provided in my final report.</p>	
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